

To
the Registrar
Environment Court
Christchurch

The Waiau Rivercare Group, wishes to be a party to the following proceedings:
In the matter of the Resource Management Act 1991 and in the matter of an appeal under clause 14(1) of Schedule 1 to the Act and of the pSWLP between the Federated Farmers of New Zealand (Southland Province) (appellant) and Southland Regional Council (respondent).

The Waiau Rivercare Group has an interest in the proceedings that is greater than that of the general public as it is the catchment group for the Lower Waiau River. The Rivercare Group comprises a cross-section of our community (urban and rural). The Waiau Rivercare Group has received letters of support for this s274 notice from Val and Helen McKay, and Glenys and Kerry Steele, members of our community.

The Waiau Rivercare Group is not a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource Management Act 1991.

Description of interest in the proceedings

The Waiau Rivercare Group is interested in part of the proceedings. The part of the proceedings the Waiau Rivercare Group is interested in is the provisions relating to the Waiau River, specifically, Objective 10, Policy 26, and Rule 52A.

The Waiau Rivercare Group is interested in the following issues:

- The content of Objective 10, including the matters that must be recognised and provided for.
- The content of Policy 26, including the requirement to recognise and provide for the location of the generation activity, and the practical constraints of development, operation, maintenance and upgrading of the Manapouri Power Scheme (MPS).
- The content of Rules which apply to the MPS, including Rule 52A, which affords a controlled activity status to the renewal of the water take for the MPS.
- The extent to which the above provisions reduce the Regional Council's ability to reconsider, manage and alter the water take and its effects on the environment in the future.
- The impact of the above provisions on:
 - The Waiau River
 - Te Wae Wae Lagoon and the surrounding coastal marine area
 - Deep Cove
 - The ability for the community to realise their aspirations for freshwater, both in terms of quality and quantity, including, but not exclusively, through the National Policy Statement for Freshwater Management.

Position on relief sought by Appellant

The Waiau Rivercare Group opposes the relief sought to Objective 10, as it incorporates the MPS, including its structures, discharges, and water take, into the existing environment, and provides for the enhancement of the MPS. This would reduce the Regional Council's ability to fully consider and manage the impacts of the MPS on the Waiau River, Te Wae Wae Lagoon and the surrounding coastal marine area, Deep Cove, and the aspirations of the community for freshwater, both in terms of quality and quantity. The relief sought would not enable the Regional Council to give effect to the National Policy Statement for Freshwater Management.

The Waiau Rivercare Group supports the relief sought to Policy 26 and the relief sought to Rule 52A in so far as it would result in the water take for the MPS being classified as a discretionary activity. In isolation from the relief sought to Objective 10, the Waiau Rivercare Group believes the relief sought to Policy 26 and Rule 52A would enhance the Regional Council's ability to reconsider the appropriateness of the water take for the MPS and alter the water take in the future as appropriate. It would also increase the Regional Council's ability to fully consider and manage the impacts of the MPS on:

- The Waiau River
- Te Wae Wae Lagoon and the surrounding coastal marine area
- Deep Cove
- The ability for the community to realise their aspirations for freshwater, both in terms of quality and quantity.

The Waiau Rivercare Group agrees to participate in mediation or other alternative dispute resolution of the proceedings.



Paul Marshall
Co-Chairperson, Waiau Rivercare Group
21/06/18

Address for service: 983 Lillburn-Monowai Road, RD1, Tuatapere, 9691/
waiiau.rivercare.group@gmail.com
Telephone: 027 306 7737
Fax/email: waiiau.rivercare.group@gmail.com
Contact person: Paul Marshall, Co-Chair, Waiau Rivercare Group