

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

ENV-2018-CHC-000038

IN THE MATTER the Resource Management Act 1991 ("**RMA**")

A N D

IN THE MATTER of an appeal under clause 14(1) of the First Schedule of
the RMA in relation to the Proposed Southland Water and
Land Plan

BETWEEN **Meridian Energy Limited**

Appellant

A N D **Southland Regional Council**

Respondent

**NOTICE OF WISH TO BE PARTY TO PROCEEDINGS UNDER
SECTION 274 OF RMA**

ARATIATIA LIVESTOCK LIMITED

Dated this 15th day of June 2018

**ELLIS GOULD
LAWYERS
AUCKLAND**

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AUCKLAND**

REF: Douglas Allan

**Notice of wish to be party to proceedings under section 274 RMA by Aratiatia
Livestock Limited**

1. Aratiatia Livestock Limited ("**Aratiatia**") wishes to be a party to Notice of Appeal ENV-2018-CHC-000038 dated 17 May 2018 by Meridian Energy Limited ("**Meridian**") c/- SW Christensen, barrister (stephen@projectbarrister.nz) to the Environment Court ("**the Appeal**") against the decision of the Southland Regional Council on the Proposed Southland Water and Land Plan ("**the Plan**").
2. Aratiatia is entitled to be a party to the Appeal for the following reasons:
 - (a) Aratiatia has an interest in the proceedings that is greater than that of the general public in that:
 - (i) It owns and farms land on the right (western) bank of the Waiau River at Lilburn that is directly and adversely affected by the alterations to the River flow caused by Meridian's Manapouri hydroelectric power generation scheme.
 - (ii) Aratiatia's ongoing management of its landholdings will be directly and adversely affected by the relief sought in the Appeal.
 - (b) Aratiatia made a further submission in opposition to Meridian's original submission on the Plan, being the submission which gave rise to the Appeal.
 - (c) Aratiatia lodged Notice of Appeal ENV-2018-CHC-000029 dated 16 May 2018 which seeks relief on matters addressed in the Appeal ("**Aratiatia Appeal**").
3. Aratiatia is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
4. Aratiatia is interested in and opposes all aspects of the Appeal relief.
5. The reasons for Aratiatia's opposition to the Appeal are:
 - (a) The relief sought in the Appeal is inappropriate in terms of section 32 of the RMA and contrary to the purpose, principles and other provisions of the RMA.
 - (b) The relief sought in the Appeal will generate significant adverse effects on the environment and in particular on the Waiau River and land management practices within the Waiau River catchment.

- (c) The grounds set out in the Aratiatia Appeal.
6. Aratiatia agrees to participate in mediation or other alternative dispute resolution of the proceedings.

**Signed for and on behalf of Aratiatia Livestock Limited by
its solicitors and duly authorised agents Ellis Gould:**



D A Allan

Dated this 15th day of June 2018

Address for Service of Section 274 Party: The offices of Ellis Gould, Solicitors, Level 17, The Vero Centre, 48 Shortland Street, Auckland (PO Box 1509, Auckland, 1140), DX CP22003, Phone: 09 307-2172, Facsimile, 09 358-5215. Attention: D A Allan, Email: dallan@ellisgould.co.nz