

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 Proposed Southland Water and Land Plan (pSWLP) between Meridian Energy Limited (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 all of the proceedings.

The Waiau Rivercare Group is interested in the following issues:

- The content of Objectives that relate to the Manapouri Power Scheme (MPS), including the matters that must be recognised and provided for in Objective 10.
- 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 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 for the MPS 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, and 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 by the Appellant. The Waiau Rivercare Group believes the relief would prevent the Regional Council from reconsidering the

appropriateness of the water take for the MPS or altering the water take in the future as appropriate. The relief sought would prevent the Regional Council from fully considering and managing 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 relief sought would not enable the Regional Council to give effect to the National Policy Statement for Freshwater Management.

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

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