

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 WAIHOPAI RŪNAKA, HOKONUI RŪNAKA, TE RŪNANGA O AWARUA, TE RŪNANGA O ORAKA APARIMA, and TE RŪNANGA O NGĀI TAHU (collectively NGĀI TAHU) (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, Rule 52A, and Appendix E.

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 content of Appendix E, including the exemption in the instance where a water quality standard is breached as a result of 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
 - 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 supports the relief sought to Objective 10, Policy 26, and Appendix E. The Waiau Rivercare Group also supports the relief sought to Rule 52A in so far as it removes the controlled activity status for the water take for the MPS. The Waiau Rivercare Group believes the relief would provide the Regional Council with the ability to reconsider the appropriateness of the water take for the MPS and alter the water take in the future as appropriate. The relief sought would enhance the Regional Council's ability to 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 relief sought would 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.



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