

**BEFORE THE ENVIRONMENT COURT  
I MUA I TE KOOTI TAIAO O AOTEAROA  
IN CHRISTCHURCH**

**ENV-2018-CHC-000038**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of appeals pursuant to  
clause 14 of Schedule 1 to  
the Act in relation to the  
Decision on the Proposed  
Southland Water and Land  
Plan

**BETWEEN** **MERIDIAN ENERGY  
LIMITED**

**Appellant**

**AND** **SOUTHLAND REGIONAL  
COUNCIL**

**Respondent**

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**NOTICE OF PERSON'S INTENTION TO BECOME A PARTY TO PROCEEDINGS  
PURSUANT TO SECTION 274 OF THE RESOURCE MANAGEMENT ACT 1991**

**DATED 22 JUNE 2018**

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## NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS

*Section 274, Resource Management Act 1991*

**To:** The Registrar  
Environment Court  
Christchurch

1. Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Oraka Aparima (collectively Ngā Rūnanga), and Te Rūnanga o Ngāi Tahu (collectively Ngāi Tahu) (collectively, **Ngā Rūnanga**), wish to be a party to the above proceeding.
2. Ngā Rūnanga made a submission about the subject matter of the proceedings.
3. In addition, Te Rūnanga is the iwi authority over the takiwā of Ngāi Tahu which includes all of the area covered by the Southland Regional Council. Te Rūnanga is comprised of 18 Papatipu Rūnanga including Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua, and Te Rūnanga o Oraka Aparima within whose takiwā the Southland region lies. In that respect, Te Rūnanga has an interest in the proceedings greater than the general public.
4. Ngā Rūnanga are not trade competitors for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**RMA**).
5. Ngā Rūnanga is interested in all of the proceedings.
6. Ngā Rūnanga is interested in the following particular issues:
  - (a) **Objective 10** – Redrafting to consider operation of the scheme as a part of the existing environment and providing for enhancement of the scheme.
  - (b) **New Objective renewable energy** – Amending the objective so it recognises and provides for the national significance of renewable electricity generation sources.
  - (c) **Policy 26 Renewable energy** – Amending the policy to recognise the effects of land use and the use of the beds of lakes and rivers and the

discharge of contaminants or water to water which may impact on renewable electricity generation.

- (d) **New rule 49(ab)** – Extending rule to include damming and diversion as well as take and use of water (making these a permitted activity) and making Manapouri an exception to take restrictions of 1 September to 31 March.
- (e) **Rule 52, Rule 52A** - Including Monowai in new rule and removing requirement for conditions to be applied where the renewal meets the relevant flow and levels regimes in the Plan and making it discretionary rather than non-complying where controlled activity status cannot be met.

7. Ngā Rūnanga opposes in part the relief sought by the Meridian Energy because:

- (a) Lake Manapouri and the Waiau River are Statutory Acknowledgement Areas. The amendments sought could result in development and use of both Manapouri and Waiau in ways that adversely affect the relationship of Ngā Rūnanga with these rivers.
- (b) They are concerned that the proposed amendments could lead to the placement of new hydro-schemes in water bodies of importance to Ngāi Tahu.
- (c) They consider the objectives and policies as notified provide sufficient guidance for processing a resource consent for renewable energy.
- (d) They oppose the amendment to water abstraction rules is opposed in so far as it removes the ability for Ngā Rūnanga to consider possible use of the water that has been held under a long term consent, in particular whether or not there is the ability to allocate some of that water for mahinga kai enhancement.

8. Ngā Rūnanga agrees to participate in mediation or other alternative dispute resolution of the proceedings.

**DATED** at Wellington this 22 day of June 2018



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J G A Winchester  
Counsel for Ngā Rūnanga

**Address for service of person wishing to be a party:**

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