

In the Environment Court
At Christchurch

ENV-2025-CHC-125

I te Kōti Taiao o Aotearoa
Ki Ōtautahi

Under the Resource Management Act 1991 (**RMA**)

In the matter of an appeal under clause 14(1) of Schedule 1 and section 274 of the RMA

Between **BULLER CONSERVATION GROUP**

Appellant

And **TE TAI O POUTINI PLAN COMMITTEE**

Respondent

**NOTICE OF TE RŪNANGA O NGĀTI WAEWAE, TE RŪNANGA O MAKAAWHIO AND
TE RŪNANGA O NGĀI TAHU WHO WISH TO BECOME A PARTY TO PROCEEDINGS**

Dated: 2 February 2026

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To: The Registrar
Environment Court
Christchurch

Introduction

- 1.** Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (collectively referred to as **Poutini Ngāi Tahu**) and Te Rūnanga o Ngāi Tahu (**TRoNT**) wish to be a party to an appeal made by Buller Conservation Group (**Appellant**) against parts of Te Tai o Poutini Plan Committee (**TTPP Committee**) decision on the Proposed Te Tai o Poutini Plan (**TTPP**).
- 2.** Poutini Ngāi Tahu and TRoNT made a submission about the subject matter of the proceeding. Poutini Ngāi Tahu and TRoNT either made a submission on the relevant provisions appealed, or the appeal points concern the same subject matter and issues that are prevalent throughout its submissions.
- 3.** Poutini Ngāi Tahu and TRoNT also have an interest that is greater than the interest of the general public, as mana whenua of the land that is subject to the TTPP and for the reasons set out in its Notice of Appeal, ENV-2025-CHC-134, at [6] to [12].
- 4.** Poutini Ngāi Tahu and TRoNT are not trade competitors for the purposes of 308C or 308CA of the RMA.

Interest in proceedings

- 5.** The parts of the proceedings that Poutini Ngāi Tahu and TRoNT seek to join, its position on those appeals, and the reasons for that position are set out in **Appendix A**.
- 6.** More generally where the relief is opposed, the relief:
 - (a)** Will not promote the sustainable management of natural and physical resources, and will not achieve the purpose of the RMA, in that it:

- (i) fails to sustain the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations;
 - (ii) does not safeguard the life-supporting capacity of air, water, soil, and ecosystems; and
 - (iii) fails to appropriately avoid, remedy, or mitigate adverse effects of activities on the environment;
- (b) Is contrary to Part 2 of the RMA, including sections 6(e), 7 and 8;
 - (c) Is not the most appropriate way to achieve the purpose of the RMA, as required under section 32 of the RMA; and
 - (d) Does not properly give effect to direction in relevant national instruments.

7. Poutini Ngāi Tahu and TRoNT agrees to participate in mediation or other alternative dispute resolution of the proceedings.

DATED 2 February 2026



Sarah Scott / Oscar Wilson
Counsel for Te Rūnanga o Ngāti
Waewae, Te Rūnanga o Makaawhio
and Te Rūnanga o Ngāi Tahu

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Appendix A – Poutini Ngāi Tahu and Te Rūnanga o Ngāi Tahu appeal position

PROVISION	APPELLANT RELIEF (SHOWN IN <u>UNDERLINED AND STRUCK THROUGH</u> BLACK FONT)	POUTINI NGĀI TAHU AND TRONT POSITION ON RELIEF AND REASONS
Ecosystems and Biodiversity	Indigenous vegetation clearance outside of Significant Natural Areas not provided for in another Permitted Activity Rule	Oppose
ECO-R6	There needs to be more restrictions around fencing. The retrieval of windblown timber should not be a permitted activity.	The retention of windthrown timber is part of the requirements to operate.
Subdivision SUB-R6	<p>SUB - R6 Subdivision to create allotment(s) in any RURZ - Rural Zone or MPZ - Māori Purpose Zone Activity Status Controlled ...</p> <p>3. This is not within an area of:</p> <ul style="list-style-type: none"> i. Outstanding Natural Landscape as identified in Schedule Five; ii. Outstanding Natural Feature as identified in Schedule Six; iii. Sites of Historic Heritage as identified in Schedule One; iv. <u>unmodified areas</u> <p>...</p>	<p>Oppose</p> <p>Due to historical reasons, much Māori Land has not been able to be developed. This addition would prevent the development of Māori Land which is the opposite purpose of the Māori Purpose Zone. There is a seperate provision relating to indigious biodiviersty and the national direction provides guidance on how to balance the protection of biodiversity while allowing the development of Māori land. Therefore an additional restriction is not necessary.</p> <p>There is also no definition for unmodified areas.</p>
Coastal Environment CE-R4	<p>CE - R4 Buildings and Structures in the Coastal Environment that are outside of the Outstanding Coastal Environment Area</p> <p><u>1, These are not located within: The Outstanding Coastal Environment Area ii unmodified areas</u></p> <p><u>And</u></p> <p>A. These are: Buildings and structures (etc)</p>	<p>Oppose</p> <p>There is no definition for unmodified areas. There is no reason for this rule that is not already covered by other District Wide chapters (i.e ECO, ONL, Earthworks)</p>