

In the Environment Court
At Christchurch

ENV-2025-CHC-122

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 **GROUNDSWELL NZ**

Appellant

And **TE TAI O POUTINI PLAN COMMITTEE**

Respondent

**NOTICE OF TE RŪNANGA O NGĀTI WAEWAE, TE RŪNANGA O MAKAAWHIO AND
TĒ 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 Groundswell NZ (**Appellant**) against parts of the 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, not the planning standards.

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

DATED 2 February 2026



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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 BLACK FONT</u>)	POUTINI NGĀI TAHU AND TRONT POSITION ON RELIEF AND REASONS
Sites & Areas of Significance to Maori (SASM) Entire Chapter	Remove all policies, rules and consequential planning mechanisms that arise from Section 6 of the RMA	Oppose This is a requirement of the RMA and national planning standards. This also conflicts with the submission that Poutini Ngāi Tahu and TRoNT made on the TTPP.
Natural Character & Margins of Waterbodies (NC) Entire chapter	Remove all policies, rules and consequential planning mechanisms that arise from Section 6 of the RMA	Oppose This is a requirement of the RMA and national planning standards.
Activities on the Surface Water (ASW) Entire chapter	Remove all policies, rules and consequential planning mechanisms that arise from Section 6 of the RMA	Oppose This is a requirement of the RMA and national planning standards.
Historic Heritage (HH) Entire chapter	Remove all policies, rules and consequential planning mechanisms that arise from Section 6 of the RMA	Oppose This is a requirement of the RMA and national planning standards.
Coastal Environment (CE) Entire chapter	Remove all policies, rules and consequential planning mechanisms that arise from Section 6 of the RMA	Oppose This is a requirement of the RMA and national planning standards, and gives effect to the NZCPS
Ecosystems and Indigioius Biodiversity (ECO) Entire Chapter	Remove all policies, rules and consequential planning mechanisms that arise from Section 6 of the RMA	Oppose This is a requirement of the RMA and national planning standards, and gives effect to the NPL-IB. Also do not support reverting to the notified verison of the ECO provisions – particularly ECO-O4, ECO-O5, ECO-P2, ECO-P4, ECO-P6, ECO-P8, ECO-P9 and ECO-R5 as they have content that reflect more of the Ngāi Tahu Deed of Settlement 1997, the NPS-IB in relation to Tangata Whenua, and Part 2 of the RMA compared to the notified version.