

In the Environment Court  
At Christchurch

ENV-2025-CHC-128

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** **LYN MCINTOSH**

Appellant

**And** **TE TAI O POUTINI PLAN COMMITTEE**

Respondent

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**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 Lyn McIntosh (**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 (Submission 620). 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.** Poutini Ngāi Tahu and TRoNT are interested in parts of the proceedings, being the aspects that relate to SASM 120.
- 6.** Poutini Ngāi Tahu and TRoNT oppose the relief sought by the Appellant because:
  - (a)** SASM 120 (Totara Lagoon) recognises an important mahinga kai, and it also encompasses old occupation sites, including middens. Reducing the SASM to just the water in order to alleviate an individual's concerns would be incompatible with the protection provided for the SASM;

- (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.

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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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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