

In the Environment Court of New Zealand
at Christchurch

ENV 2025-CHC-000138

I te Kōti Taiao o Aotearoa
ki Ōtautahi

Under the Resource Management Act 1991

In the matter of an appeal under clause 14 of Schedule 1 of the
Resource Management Act 1991 against the decision
of the Te Tai O Poutini Plan Committee on the
proposed Te Tai O Poutini Plan: A Combined District
Plan for the West Coast

Between **Ridgeline 3 Investments Limited**
Appellant

And **Te Tai O Poutini Plan Committee**
Respondent

Notice of wish to be a party to an appeal on behalf of Westland District Council

2 February 2026



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Notice of wish to be a party to an appeal on behalf of Westland District Council

To: **The Registrar of the Environment Court at Christchurch**

1. Name of person who wishes to be a Party

1.1 Westland District Council (**Council**) wishes to be a party to the following proceeding:

a. An appeal by Ridgeline 3 Investments Limited (**Appellant**) against parts of a decision of the Te Tai O Poutini Plan Committee on the proposed Te Tai o Poutini Plan (**ENV-2025-CHC-000138**).

1.2 Pursuant to s 274(1)(b) of the Resource Management Act 1991 (**RMA**) the Council is a local authority and may be a party to the proceedings.

2. Trade competition

2.1 The Council is not a trade competitor for the purposes of sections 308C or 308CA of the RMA.

3. The proceeding

3.1 The Council is interested in the appeal in its entirety.

3.2 The Council opposes the relief sought by the Appellants as it relates to all provisions regarding Sites and Areas of Significance to Māori (**SASM**), including all related objectives, policies, rules, methods, overlays, schedules, maps/overlays, definitions and consequential provisions in the proposed Te Tai o Poutini Plan (**TTPP**).

3.3 In particular, the Council opposes the following relief sought by the Appellant:

- a. The deletion of the SASM provisions in the TTPP or a full and comprehensive review and amendment of these provisions to:
- i. Provide for accurately defined SASM overlays which are supported by verifiable evidence and which include an explicit schedule of values, attributes and management responses or methods.
 - ii. Remove all certification, written approval or similar sign-off by any third party as a precondition to exercising permitted activity rights or obtaining consent.

- iii. Reclassify activities to be the least restrictive status necessary to achieve appropriate objectives, with clear, measurable permitted standards where effects are minor or can be appropriately managed, including for earthworks, buildings/structures, vegetation clearance, maintenance and repair and temporary activities.
- b. In respect of the Appellant's land in particular:
- i. remove or substantially amend the boundaries of the SASM on the land and the provision of explicit justification for the level of future management proposed in the TTPP for the land;
 - ii. amend, to the extent required, the policies and rules in the TTPP in order to provide for the continuation of the Appellant's sustainable forestry harvesting operation on the land as either a permitted or controlled activity, including appropriate standards and/or matters of control;
 - iii. provide for subdivision of the land as a controlled activity;
 - iv. amend the TTPP to ensure that its provisions enable the harvesting and removal of the privately owned pounamu resource by the Appellant and/or any future owner of the land as a permitted activity; and
 - v. provide for primary production (as defined) as a permitted activity on the land.

3.4 The Council does not accept the reasons set out in the Appellants' appeal that these provisions could be interpreted or applied as potentially preventing any use or development of the land.

3.5 The identification and protection of SASM are required under s 6(e) of the RMA, which requires councils to recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga. The TTPP must give effect to the West Coast Regional Policy Statement, which specifically directs councils to identify and protect these culturally significant areas.

4. Dispute Resolution

4.1 The Council agrees to participate in mediation or other alternative dispute resolution of the proceeding.

Date: 2 February 2026



Katia Fraser | Felicity Wach

Counsel for Westland District Council

This document is filed by Katia Fraser and Felicity Wach of Rice Speir, solicitors for Westland District Council. The address for service on Westland District Council is Level 14, 23 Customs Street East, Auckland 1010.

Documents for service on Westland District Council may be left at the address for service or may be:

- a. Posted to the solicitor at PO Box 105147, Auckland 1143
- b. Emailed to katia.fraser@ricespeir.co.nz; felicity.wach@ricespeir.co.nz and rosie.argyle@ricespeir.co.nz