

In the Environment Court
At Christchurch

ENV-2025-CHC-138

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 **RIDGELINE 3 INVESTMENTS LIMITED**

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 Ridgeline 3 Investments Limited (ENV-2025-CHC-138) 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.

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
<p>Sites & Areas of Significance to Maori (SASM)</p> <p>Entire Chapter</p>	<p>The Appellant seeks either deletion of the SASM provisions in the TTPP or a full and comprehensive review and amendment of these provisions to:</p> <p>22.1 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;</p> <p>22.2 Removal of all certification, written approval or similar sign-off by any third party as a precondition to exercising permitted activity rights or obtaining consent;</p> <p>22.3 Reclassification of 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.</p>	<p>Oppose</p> <p>Poutini Ngāi Tahu and TRoNT considers this request to be out of scope of their submission. It is also opposed on the merits given the relief does not give effect to Part 2 of the RMA and for the reasons expressed in the Poutini Ngāi Tahu and TRoNT submission and evidence supporting SASM.</p>
<p>Mapping</p> <p>Sites & Areas of Significance to Maori (SASM)</p>	<p>In respect of the Appellant's land in particular, the relief sought additional to the above general relief is as follows:</p> <p>23.1 Removal or substantial amendment of 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;</p> <p>23.2 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.</p> <p>23.3 Provide for subdivision of the land as a controlled activity.</p> <p>23.4 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</p> <p>23.5 Provide for primary production (as defined) as a permitted activity on the land.</p> <p>The land being identified as affected by the following SASM's:</p> <ul style="list-style-type: none"> - SASM 107 – Island Hill/Raparapahoi - SASM 109 – Pyramid Hill/ Tumuaki Hill - SASM 112 – Arahura River at Tūhua - SASM 116 – Mt Tūhua 	<p>Oppose</p> <p>The four SASMs identified are important and provisions are needed for the protection of these areas. The relief does not give effect to Part 2 of the RMA and is also opposed for the reasons expressed in the Poutini Ngāi Tahu and TRoNT submission and evidence supporting SASM</p>