

In the Environment Court
At Christchurch

ENV-2025-CHC-000134

I te Kōti Taiao o Aotearoa
Ki Ōtautahi

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

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

Between **TE RŪNANGA O NGĀTI WAEWAE, TE RŪNANGA O MAKAAWHIO
AND TE RŪNANGA O NGĀI TAHU**

Appellant

And **TE TAI O POUTINI PLAN COMMITTEE**

Respondent

**MEMORANDUM OF COUNSEL ON BEHALF OF TE RŪNANGA O NGĀTI WAEWAE,
TE RŪNANGA O MAKAAWHIO AND TE RŪNANGA O NGĀI TAHU**

17 June 2026

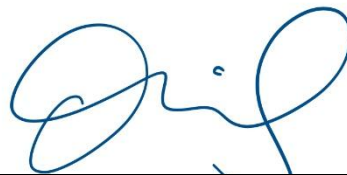
**SIMPSON
GRIERSON**

Sarah Scott / Oscar Wilson
T: +64 3 365 9914
sarah.scott@simpsongrierson.com
oscar.wilson@simpsongrierson.com
PO Box 874 Christchurch

MAY IT PLEASE THE COURT

1. This memorandum is filed on behalf of Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāi Tahu (together, **Poutini Ngāi Tahu**).
2. On December 8 2025, Poutini Ngāi Tahu filed a Notice of Appeal against parts of the decision of Te Tai o Poutini Plan Committee on the Proposed Te Tai o Poutini Plan.
3. The Appeal included relief relating to ASW-R4 (Installation of Structures on the Surface of Natural Waterbodies), identified as Appeal Point 10 in the Poutini Ngāi Tahu Appeal. The West Coast Whitebaiters Association (**WCWA**), Westpower, and Buller District Council (**BDC**) are section 274 parties in relation to this appeal point.
4. Following discussions with the WCWA, Poutini Ngāi Tahu has agreed to withdraw the part of its appeal that seeks changes to ASW-R4 (Installation of Structures on the Surface of Natural Waterbodies). This memorandum advises the Court that Appeal Point 10 is withdrawn.
5. The WCWA, Westpower, BDC, and the Te Tai o Poutini Plan Committee (as Respondent) have confirmed that they have no issues with the withdrawal of Appeal Point 10 and have no issues as to costs.

Dated: 17 June 2026



Sarah Scott / Oscar Wilson
Counsel for Poutini Ngāi Tahu