

**IN THE HIGH COURT OF NEW ZEALAND  
DUNEDIN REGISTRY**

**I TE KŌTI MATUA O AOTEAROA  
ŌTEPOTI ROHE**

**CIV-2024-**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of an appeal under s 299 and clause 56 of schedule 1  
to the Act

**BETWEEN** **TE RŪNANGA O MOERAKI, KĀTI HUIRAPA  
RŪNAKA KI PUKETERAKI, TE RŪNANGA O  
ŌTĀKOU AND HOKONUI RŪNANGA**

First Appellant

**AND** **TE AO MARAMA INCORPORATED ON BEHALF OF  
WAIHOPAI RŪNAKA, TE RŪNANGA O ŌRAKA  
APARIMA, AND TE RŪNANGA O AWARUA**

Second Appellant

(continued overleaf)

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**NOTICE OF INTENTION FOR BEEF + LAMB NEW ZEALAND LIMITED TO  
APPEAR AND BE HEARD ON APPEAL**

**8 MAY 2024**

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**AND**

**TE RŪNANGA O NGĀI TAHU**

Third Appellant

**AND**

**OTAGO REGIONAL COUNCIL**

Respondent

**TO:** The Registrar of the High Court at Dunedin

**AND:** Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga

**AND:** Te Ao Marama Incorporated on behalf of Waihopai Rūnaka, Te Rūnanga o Ōraka Aparima and Te Rūnanga o Awarua

**AND:** Te Rūnanga O Ngāi Tahu

**AND:** Otago Regional Council

**This document notifies you that –**

1. Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga; Te Ao Marama Incorporated on behalf of Waihopai Rūnaka, Te Rūnanga o Ōraka Aparima and Te Rūnanga o Awarua; and Te Rūnanga O Ngāi Tahu (**the Appellants**) have filed a notice of appeal to the High Court against the decisions of the Otago Regional Council (**the Respondent**) on the Freshwater Planning Instrument parts of the Proposed Otago Regional Policy Statement (**pORPS**), upon the grounds that the Respondent made errors of law.
2. Beef + Lamb New Zealand Limited (**B+LNZ**) lodged a submission to the Freshwater Hearings Panel which made recommendations on the pORPS to the Respondent.<sup>1</sup> The Respondent accepted those recommendations.
3. B+LNZ was served with the Appellants' notice of appeal on 24 April 2024.
4. Pursuant to cl 56(4) of schedule 1, and to s 301 Resource Management Act 1991, B+LNZ intends to appear and be heard on this matter.
5. B+LNZ wish to be heard on all questions of law pleaded by the Appellants in the notice of appeal dated 22 April 2024.

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<sup>1</sup> Resource Management Act 1991, sch 1 cl 56(1).



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CP Thomsen/KJ Simonsen  
Counsel for s 301 party  
Beef + Lamb New Zealand Ltd  
8 May 2024

This notice was filed by **CHRISTOPHER PAUL THOMSEN**, solicitor for the party of the firm Fletcher Vautier Moore. The address for service of the above-named party is at the offices of Fletcher Vautier Moore, Solicitors, 265A Queen Street, Richmond, Nelson.

Documents for service on the party may be:

- (a) Sent by email to [cthomsen@fvm.co.nz](mailto:cthomsen@fvm.co.nz) and [ksimonsen@fvm.co.nz](mailto:ksimonsen@fvm.co.nz) provided original documents are then posted to the solicitor; or
- (b) Posted to the solicitor at Fletcher Vautier Moore, Solicitors, P O Box 3029, Richmond, Nelson.