

IN THE ENVIRONMENT COURT
AT CHRISTCHURCH

ENV-2024-CHC-36

I TE KŌTI TAIAO O AOTEAROA
KI ŌTAUTAHI

IN THE MATTER

of an appeal under clause 14(1) of the First
Schedule of the Resource Management Act
1991

BETWEEN

**Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka
Ki Puketeraki, Te Rūnanga o Ōtākou and
Hokonui Rūnanga**
First Appellants

**Te Ao Marama Incorporated on behalf of
Waihopai Rūnaka, Te Rūnanga o Ōraka
Aparima and Te Rūnanga o Aparima**
Second Appellants

Te Rūnanga o Ngāi Tahu
Third Appellant
(Collectively, Kāi Tahu)

AND

Otago Regional Council
Respondent

**NOTICE OF WISH OF DIRECTOR-GENERAL OF CONSERVATION TUMUAKI AHUREI
TO BE A PARTY TO APPEAL
7 June 2024**

Director-General of Conservation Tumuaki Ahurei
Solicitor Rōia: Pene Williams
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NOTICE OF WISH TO BE A PARTY TO PROCEEDINGS**To:**

The Registrar
Environment Court
Christchurch

1. The Director-General of Conservation Tumuaki Ahurei (D-G) wishes to be a party to the following proceedings:
Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka Ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga, First Appellants
Te Ao Marama Incorporated on behalf of Waihopai Rūnaka, Te Rūnanga o Ōraka Aparima and Te Rūnanga o Aparima, Second Appellants and Te Rūnanga o Ngāi Tahu, Third Appellant (collectively, Kāi Tahu)
v Otago Regional Council
ENV-2024-CHC-36
2. The D-G received notice of this appeal on 16 May 2023.
3. The D-G made a submission on the matters included in the proposed Otago Regional Policy Statement (RPS). The D-G has an interest in this proceeding that is greater than that of the general public.
4. The D-G is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
5. The D-G is interested in parts of the appeal, as follows:
 - a. Integrated management – safeguarding and prioritisation: IM-O3, IM-P1, and IM-P14
 - b. Integrated management – adaptive management: IM-P6
 - c. Climate change: IM-P10, IM-P12, EIT-INF-P12 and EIT-INF-P14
 - d. Coastal water quality: CE-P3
 - e. Coastal environment – customary fisheries activities: CE-O5
 - f. Coastal environment – aquaculture: CE-P11

- g. Coastal environment – reclamation: CE-P12
 - h. Coastal discharges: new policy sought
 - i. Infrastructure – effects management hierarchy: EIT-INF-P13A, EIT-EN-P6 and EIT-EN-P9A and definition of “regionally significant infrastructure”
6. The D-G **generally supports** the relief sought in relation to the matters listed because the changes sought by the Appellant will increase protection of the coastal and wider natural environment, and provide better recognition of mana whenua and mana moana interests and kaitiakitaka when compared to the Council’s decision, and will give effect to:
- a. the New Zealand Coastal Policy Statement 2010
 - b. the National Policy Statement for Freshwater Management 2020
 - c. the National Policy Statement for Indigenous Biodiversity 2023
7. Further, the relief sought would:
- a. be consistent with Part 2 of the Resource Management Act 1991 (RMA)
 - b. implement the Regional Council’s functions under s 30 of the RMA
 - c. be the most appropriate way to achieve the objectives in the pORPS, in accordance with s 32 of the RMA
8. The D-G agrees to participate in mediation or other alternative dispute resolution of the proceedings.



Pene Williams

Counsel for the Director-General of Conservation Tumuaki Ahurei

Dated 7 June 2024

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