

IN THE ENVIRONMENT COURT OF NEW ZEALAND

ENV-2021-CHC-027

CHRISTCHURCH REGISTRY

I MUA I TE KŌTI TAI AO O AOTEAROA

ŌTAUTAHI ROHE

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

In the matter of an appeal pursuant to Clause 14(1) of the First Schedule of the RMA

Between **KEN MUIR**
Appellant

And **QUEENSTOWN LAKES DISTRICT COUNCIL**
Respondent

SECTION 274 NOTICE BY TE RŪNAKA O MOERAKI, KĀTI HUIRAPA RŪNAKA KI PUKETERAKI, TE RŪNANGA O ŌTĀKOU AND HOKONU I RŪNANGA ("KĀ RŪNAKA") JOINING KEN MUIR APPEAL

DATED

14 JUNE 2021

Filed by:
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Notice of wish to be party to proceedings

Under section 274 of the Resource Management Act 1991

To **The Registrar
Environment Court
Christchurch**

1. Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (Kā Rūnaka) wish to be a party to the following proceedings concerning the Proposed Queenstown Lakes District Plan – Stage 3 (**PDP**):

ENV-2021-CHC-027 Ken Muir v Queenstown Lakes District Council (**the Appeal**)

2. Kā Rūnaka made a submission about the subject matter of the proceedings and have also lodged their own appeal (ENV-2021-CHC-055).
3. Kā Rūnaka represent the relevant Otago hapū that exercise rakatirataka and kāitiakitaka within their respective takiwā, which includes the Queenstown Lakes district. Kā Rūnaka therefore also have an interest in the proceedings that is greater than the general public.
4. Kā Rūnaka are not a trade competitor for the purposes of s308C of the RMA.
5. Kā Rūnaka are interested in all aspects of the Appeal that relate to Topic 34: Wāhi Tūpuna.
6. Kā Rūnaka oppose the relief sought by the Appellant on the grounds that it:
 - a. will not promote sustainable management of resources, and will not achieve the purpose of the RMA;
 - b. is contrary to Part 2 RMA, including sections 6(e), 7(a) and 8;
 - c. does not meet the relevant statutory considerations in Schedule 1 and Part 5 RMA;
 - d. does not give effect to, or address, the relevant statutory instruments including the partly operative Otago Regional Policy Statement (RPS); strategic provisions in Chapter 3 of the proposed District Plan; specific provisions in Chapter 5 (that relate to the relationship between Kāi Tahu and their ancestral lands, waters, sites, wāhi tupuna, wāhi tapu, and taonga within the District); relevant provisions in the Kāi Tahu ki Otago Natural Resource Management Plan 2005 and Te Tangi a Taurira 2008;
 - e. does not represent the most appropriate way of exercising the Council's functions, having regard to the efficiency and effectiveness of other reasonably practicable options, and is not appropriate in terms of section 32 and other provisions of the RMA.
7. Kā Rūnaka seek that the relief sought is not granted.
8. Kā Rūnaka agree to participate in mediation or other alternative dispute resolution of the proceedings.

9. A copy of this notice has been served on the Respondent and Appellant.



Authorised Signatory for Kā Rūnaka

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Marked for attention of: Michael Bathgate

With copy to Counsel:

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