

I MUA I TE KŌTI TAI AO O AOTEAROA

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an appeal under Clause 14 of Schedule 1 of the Act

BETWEEN LAKE HAYES LIMITED

Appellant

AND QUEENSTOWN LAKES DISTRICT COUNCIL

Respondent

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NOTICE OF PARTIES' WISH TO BE PARTY TO PROCEEDINGS

TE RŪNANGA O MOERAKI, KĀTI HUIRAPA RŪNAKA KI PUKETERAKI, TE RŪNANGA O ŌTĀKOU,  
HOKONUI RŪNANGA, TE RŪNANGA O WAIHŌPAI, TE RŪNANGA O AWARUA AND  
TE RŪNANGA O ŌRAKA-APARIMA (collectively KĀI TAHU)

Dated 29 May 2019

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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, Hokonui Rūnanga, Te Rūnanga o Waihōpai, Te Rūnanga o Awarua And Te Rūnanga o Ōraka-Aparima (Kāi Tahu) wish to be a party to the following proceedings concerning the Proposed Queenstown Lakes District Plan – Stage 2

ENV-2019-CHC-089 Lake Hayes Limited v Queenstown Lakes District Council

2. Kāi Tahu made a submission about the subject matter of the proceedings.
3. The Kāi Tahu rūnanga are Manawhenua within the Queenstown Lakes district and therefore also have an interest in the proceedings that is greater than the general public.
4. Kāi Tahu are not trade competitors.
5. Kāi Tahu are interested in part of the appeal.
6. Kāi Tahu is particularly interested in the parts of the appeal related to Chapter 25 - Earthworks
7. The ability of Kāi Tahu to provide for their cultural wellbeing is dependent on the protection of valued places, resources and landscapes, including wāhi tūpuna, and therefore Kāi Tahu are particularly interested in the following issues:
  - a. Any changes to the district plan that involve removing or amending the earthworks provisions.
  - b. Any changes to the earthworks provisions proposed in this appeal that have the potential to impact on how the proposed plan provides for and protects Kāi Tahu values in the district.
8. Kāi Tahu oppose the relief sought by the appellant for the following reasons:
  - a. Kāi Tahu wish to provide for their cultural wellbeing and protect valued places and landscapes, including wāhi tūpuna.
  - b. It is important that Manawhenua values are fully considered in consenting decisions about earthworks activities both through appropriate provisions in the policies and rules of the proposed plan and through Kāi Tahu involvement in consent processes.

- c. The earthworks provisions have been developed to appropriately manage the adverse effects of earthworks activities, particularly those that impact on waterbodies, valued places, landscapes and wāhi tūpuna.
  - d. The proposed plan's earthworks provisions opposed by the appellant are appropriate, promote sustainable management, and properly reflect and take account of the important matters in Part II of the Resource Management Act 1991, including those in sections 6(b), 6(e), 6(g), 7(a), 7(aa) and 8.
9. Kāi Tahu agree to participate in mediation or other alternative dispute resolution.



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P W Pannett

For - Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou,  
Hokonui Rūnanga, Te Rūnanga o Waihōpai, Te Rūnanga o Awarua And Te Rūnanga o Ōraka-Aparima  
(Kāi Tahu)

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