

BEFORE THE ENVIRONMENT COURT

ENV-2025-CHC 000121

AT CHRISTCHURCH

I MUA I TE KOOTI TAIAO

IN THE MATTER

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

BETWEEN

**Bathurst Resources
Limited and BT Mining
Limited**

Appellant

AND

**Te Tai o Poutini Plan
Committee**

Respondent

**NOTICE OF WISH TO BE A PARTY TO PROCEEDINGS BY THE
DIRECTOR-GENERAL OF CONSERVATION**

Dated: 27 January 2026

Department of Conservation

Counsel acting: M Pemberton

Email: mpemberton@doc.govt.nz

Telephone: 027 259 9183

Notice of person's wish to be a party to proceedings

Section 274 Resource Management Act 1991

To: The Registrar
Environment Court
CHRISTCHURCH

1. The Director-General of Conservation ("Director General") wishes to be a party to the following proceedings:
 - 1.1. Bathurst Resources Limited and BT Mining Limited v
Te Tai o Poutini Plan Committee (TTPP Committee)
2. The Director General made submissions and appeared at the hearing on the proposed Te Tai o Poutini Plan (the Plan).
3. The Director General is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (RMA).
4. The Director General has an interest greater than the interest the general public has, specifically regarding conservation values and the implementation of the New Zealand Coastal Policy Statement (NZCPS).
5. The Director General is interested in all of the proceedings, but has a particular interest in parts of the appeal relating to:
 - 5.1. Changes to provisions in the Buller Coal Zone and the Mineral Extraction Zone which promote mining to a greater extent than already provided for in the TTPP Committee's decision, and/or would reduce environmental protection compared to the TTPP Committee's decision (including BCZ-P1, BCZ-P4, BCZ-R1, BCZ-R4, new rules proposing permitted and controlled activity rules, BCZ-R5, MINZ-R1, MINZ-R2, MINZ-R5);
 - 5.2. Changes to provisions in the Ecosystems and Indigenous Biodiversity Chapter which promote mining to a greater extent than already provided for in the TTPP Committee's decision, and/or would reduce environmental protection compared to the TTPP Committee's

decision (including ECO-O2, ECO-O3, ECO-P3, new permitted and restricted discretionary activity rules proposed); and

5.3. Changes to provisions in the Coastal Environment chapter which promote mining to a greater extent than already provided for in the TTPP Committee's decision, and/or would reduce environmental protection compared to the TTPP Committee's decision.

6. The Director General **opposes** the relief sought.

Relief opposed

7. The Director General opposes the relief sought in relation to the matters listed because the changes sought by the Appellant will reduce environmental protections compared to the TTPP Committee's decision and are not consistent with the provisions of the NZCPS.

8. The Director General agrees to participate in mediation or other alternative dispute resolution of the proceedings.



Matt Pemberton

Counsel for the Director General of Conservation

27 January 2026

Address for service of person wishing to be a party:

Director General of Conservation
Planning Shared Services
Department of Conservation
Private Bag 5, Nelson 7042

Contact persons

Matt Pemberton, Senior Solicitor – Legal Services
Telephone: 027 359 9183

Email: mpemberton@doc.govt.nz

AND

Murray Brass, Senior RMA Planner

Telephone: 027213 3592

Email: mbrass@doc.govt.nz

Advice

If you have any questions about this notice, please contact the Environment Court in Auckland, Wellington, or Christchurch