

Form 33 Notice of person's wish to be party to proceedings

[Section 274](#), Resource Management Act 1991

To
the Registrar
Environment Court
Auckland, Wellington, and Christchurch

I, John Caygill, wish to be a party to the following proceedings:

- Bathurst Resources Limited ('Bathurst') and BT Mining Limited ('BT') appeal against part of the decision of the Buller District Council, Grey District Council, and Westland District Council on the proposed Te Tai o Poutini Plan ('TTPP').

I am a person who made a submission about the subject matter of the proceedings.

I am not a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource Management Act 1991.

I am interested in all of the above appeal proceedings.

I am interested in the following particular issues:

- Bathurst and BT Mining's evident desire that the Buller Coalfields Zone and Minerals Extraction Zone chapters in the TTPP should be interpreted or rewritten to allow mining to proceed even where this conflicts with environmental protection considerations elsewhere instated in the TTPP. Thus they seem to have interpreted the purpose of the Buller Coalfields Zone and Minerals Extraction Zones as a 'blank cheque' or 'trump card' to allow mining to proceed in every case, albeit with some conditions, but without major constraints from significant environmental considerations that are elsewhere outlined in the TTPP (e.g. in the chapters on Ecosystems and Indigenous Biodiversity, Natural Features and Landscapes).
- I submit that the TTPP should not be modified to further enable mining as an activity that outweighs or overrides all other land use or land status considerations.
- I oppose Bathurst's request that current coal mining licences and ancillary coal mining licences be permitted to continue past their expiry date, on the grounds that this denies the opportunity for review of activities and conditions that should be modified or no longer permitted in view of new or changed environmental considerations. Similarly I oppose Bathurst's request 'to amend MINZ-P1 --- to make it clear that mining activities authorised at the date of the notification of the TTPP are to be provided for in an enduring way.' (Bathurst Appeal, para' 42).
- In regard to mineral extraction activities, Bathurst seeks to 'be able to utilise all types of environmental effects management methods, including the use of environmental offsets, compensation and/or take into account other ecological benefits.' (para' 18). I submit that environmental offsets, compensation, and taking account of other ecological benefits should not be considered as an adequate response to adverse effects unless the management hierarchy of avoidance, remediation, and mitigation has already been applied where practicable and the

significant adverse effects have persisted. If an appropriate and commensurate offset is not possible, then the activity itself should be avoided.

I agree to participate in mediation or other alternative dispute resolution of the proceedings.

Signature of person wishing to be a party:
John Caygill.

Date 13/1/2026

Address for service of person wishing to be a party: 17 Palmerston Street, Greymouth
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Contact person: John Caygill.

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