

In the Environment Court of New Zealand
Christchurch Registry

I Mua I Te Kōti Taiao O Aotearoa
Ōtautahi Rohe

ENV-2025-CHC-000125

Under	the Resource Management Act 1991 (the Act)
In the matter of	an appeal under clause 14(1) of the First Schedule of the Act on a decision on the proposed Te Tai o Poutini Plan
Between	Buller Conservation Group Appellant Te Tai o Poutini Plan Committee Respondent

Notice of wish to be party to proceedings pursuant to section 274 of the Act

13 January 2026

Section 274 party's solicitors:

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Notice of WMS Group (HQ) Limited's wish to be party to proceedings

Section 274, Resource Management Act 1991

To: The Registrar
Environment Court
Christchurch

- 1 WMS Group (HQ) Limited (**WMS Group**) wish to be a party to the appeal by the Buller Conservation Group on the proposed Te Tai o Poutini Plan (ENV-2025-CHC-000125) (**Appeal**) pursuant to section 274 of the Resource Management Act 1991 (**Act**).
- 2 WMS Group made a submission (S599) and further submission (FS231) about the subject matter of the proceedings.
- 3 WMS Group has an interest in the proceedings that is greater than the interest that the general public has because it's business of critical minerals mining, port and bulk logistics operations will be affected by the relief sought in the Appeal.
- 4 WMS Group is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 5 WMS Group is interested in part of the proceedings. WMS Group is interested in the following particular issues:
 - (a) the definition of *Riparian Margin*;
 - (b) relief related to the Ecosystems and Indigenous Biodiversity chapter;
 - (c) Natural Character and the Margins of Waterbodies Rule 1 (NC-R1);
 - (d) Coastal Environment rules relating to Buildings and Structures (CE-R4, CE-R5);
 - (e) relief related to mineral prospecting, exploration, extraction and ancillary activities in the General Rural Zone and Mineral Extraction Zone.
- 6 WMS Group oppose the relief sought above, to the extent it is inconsistent with what WMS is seeking in its appeal, including because it—
 - (a) places greater emphasis on preserving and protecting the environment generally, including in insignificant areas, at the expense of community economic development;
 - (b) unreasonably restricts environmentally responsible mineral extraction activities on the West Coast;

- (c) does not assist the councils in carrying out their statutory functions under the Act;
- (d) fails to meet the requirements of section 32 of the Act (in that the amendments sought to the proposed objectives, policies and rules are not the most appropriate method for achieving the Act's purpose); and
- (e) does not promote the sustainable management purpose or accord with Part 2 of the Act.

7 WMS Group agree to participate in mediation or other alternative dispute resolution of the proceedings.

Dated 13 January 2026



Alex Booker / Kelsey Barry
Counsel for WMS Group (HQ) Limited

Address for service of person wishing to be a party

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Advice

If you have any questions about this notice, contact the Environment Court in Christchurch.