

In the Environment Court of New Zealand  
Christchurch Registry

I Mua I Te Kōti Taiao O Aotearoa  
Ōtautahi Rohe

**ENV-2025-CHC-000117**

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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	<b>The Royal Forest and Bird Protection Society of New Zealand Incorporated</b>
	Appellant
	<b>Te Tai o Poutini Plan Committee</b>
	Respondent

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

13 January 2026

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**Section 274 party's solicitors:**

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**anderson  
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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 Royal Forest and Bird Protection Society of New Zealand Incorporated on the proposed Te Tai o Poutini Plan (ENV-2025-CHC-000117) (**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) Appeal points 4. and 8. relating to the definitions of *Area of Significant Indigenous Biodiversity* and *Riparian Margin* respectively;
  - (b) Appeal points 9., 11. – 14. relating to Strategic Directions;
  - (c) Appeal points 44. – 45. relating to Transport;
  - (d) Appeal points 46. – 74. relating to Ecosystems and Indigenous Biodiversity;
  - (e) Appeal points 76. – 81. relating to Natural Character and Margins of Waterbodies;
  - (f) Appeal points 93. – 103. relating to Coastal Environment;
  - (g) Appeal points 104. – 106. relating to Earthworks;
  - (h) Appeal points 107. – 108. relating to Light;
  - (i) Appeal points 116. – 121. relating to Rural Zones and the General Rural Zone; and
  - (j) Appeal point 123. relating to the Mineral Extraction Zone.

- 6 WMS oppose the relief sought above, to the extent it is inconsistent with what WMS is seeking in its appeal, 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 agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated 13 January 2026



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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.