

**IN THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

**I MUA I TE KŌTI TAIAO O AOTEAROA
KI ŌTAUTAHI**

ENV-2025-CHC-000111

**IN THE MATTER
OF**

an appeal under clause 14 of Schedule 1 and section
274 of the RMA

BETWEEN

DIRECTOR-GENERAL OF CONSERVATION

Appellant

AND

TE TAI O POUTINI PLAN COMMITTEE

Respondent

NOTICE BY GREY DISTRICT COUNCIL OF WISH TO BE A PARTY TO PROCEEDINGS

Dated: 2 February 2026

Presented for filing by:

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NOTICE BY GREY DISTRICT COUNCIL OF WISH TO BE A PARTY TO PROCEEDINGS

To: The registrar at the Environment Court, Christchurch

And to: The Appellant

And to: The Respondent

Grey District Council (**GDC**) wishes to be a party to an appeal by the Director-General of Conservation against the decision of the Te Tai o Poutini Committee on the proposed Te Tai o Poutini Plan (**TTPP**).

Nature of interest

1. GDC is a local authority under the Resource Management Act 1991 (**RMA**).
2. GDC is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
3. GDC is interested in all the proceedings.
4. GDC is interested in the following particular issues:
 - (a) ensuring that the TTPP is workable for GDC as a local authority and that it assists GDC in carrying out its functions under the RMA; and
 - (b) ensuring the TTPP recognises that:
 - (i) The West Coast has a unique environment, that is characterised by about 85% of land in the region managed by the Department of Conservation. This unique context means that development in the remaining areas needs to be enabled to provide for the region's social, economic and cultural wellbeing.
 - (ii) The Grey District needs sustainable infrastructure and services that enable communities to be thriving, resilient and connected.
 - (iii) The TTPP should enable the use and development of natural and physical resources while ensuring protections are appropriate for the West Coast.
 - (iv) The TTPP should not create pressures on affordability of housing, farming, industry and infrastructure, as well as other developments through disproportionate or unworkable standards for development and use in the region.

- (v) The West Coast region is highly susceptible to the impacts of climate change and natural hazards, which require ensuring the protection of infrastructure and development

Relief sought

- 5. GDC opposes each relief as set out in the table in Appendix 1 (attached).
- 6. The reasons for GDC's position are:
 - (a) the relief will not promote the sustainable management of natural and physical resources within the Grey District, and is therefore inconsistent with Part 2 and other provisions of the RMA;
 - (b) the relief will not meet the reasonably foreseeable needs of future generations;
 - (c) the relief will not enable the social, economic and cultural wellbeing of the people of the Grey District;
 - (d) the relief will not facilitate the efficient use and development of natural and physical resources;
 - (e) the relief will not avoid, remedy or mitigate actual or potential adverse effects on the environment;
 - (f) the relief is not the most appropriate way to achieve the purpose of the RMA and/or objectives of the TTPP in terms of section 32 of the RMA;
 - (g) the relief will not ensure the TTPP is workable for GDC as a local authority and that it assists GDC in carrying out its functions under the RMA; and
 - (h) the further specific reasons where set out in Appendix 1 (without limiting the general reasons above).

Alternative dispute resolution

7. GDC agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 2 February 2026



G A Biggs / J C Sylvester
Counsel for Grey District Council

This document is filed by Jonathon Cameron Sylvester, solicitor for Grey District Council of the firm Corcoran French, Lawyers. The address for service is at 74 Armagh Street, PO Box 13-001, Christchurch, Phone: (03) 379 4660. Documents for service on Grey District Council may be left at the address for service or may be:

- (a) Posted to the solicitor at PO Box 13001, Christchurch 8141; or
- (b) Emailed to jonathon@cflaw.co.nz as long as they are contemporaneously emailed to geraldine@cflaw.co.nz.

Advice

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

Appendix 1: Grey District Council's interest in the appeal of the Director-General of Conservation

#	TTPP Provision	Relief sought by the appellant	Grey District Council's position	Further Reasons for Grey District Council's Position
1.	Objective ECO-O3	Delete objective ECO-O3.	Oppose	
2.	Rule ECO-R1 Permitted Activity General Standards	Amend ECO-R1 to make it certain that these standards also apply to all permitted activity rules outside SNAs.	Oppose	
3.	Rule ECO-R6 Indigenous vegetation clearance outside SNAs	Amend to make it certain that this rule is subject to the standards in ECO-R1 (or if not, add area limits directly within this rule).	Oppose	GDC considers the rule is clear and specifically drafted for low effect activities.
4.	Policy NH-P7 Hazard sensitive activities within Severe Natural Hazard Overlays	Either delete this exemption, or in the alternative broaden it to recognise all protection measures, not just hard protection structures.	Oppose	
5.	NH-P12 Hard protection structures	Clarify that only clauses a) and b) are "either/or", and that all of clause c) to f) must always be met.	Oppose	GDC considers the policy as drafted is appropriate and gives effect to the NZCPS.