

**IN THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

**I MUA I TE KŌTI TAI AO O AOTEAROA
KI ŌTAUTAHI**

ENV-2025-CHC-000108

IN THE MATTER OF an appeal under clause 14 of Schedule 1 and section
274 of the RMA

BETWEEN **TĀIKO CRITICAL MINERALS LIMITED**

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 Tāiko Critical Minerals Limited 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 sections 308C or 308CA of the RMA.
3. GDC is interested in part of the proceedings. The parts of the proceedings that GDC is interested in are those that apply within the Grey District and relate to the following chapters of the TTPP, as particularised in Appendix 1:
 - (a) Strategic Directions, Overview, LBPP – Land Based Primary Production and MIN – Mineral Extraction, and NENV – Natural Environment.
 - (b) NH - Natural Hazards;
 - (c) ECO – Ecosystems and Indigenous Biodiversity;
 - (d) CE - Coastal Environment;
 - (e) EW – Earthworks;
 - (f) LIGHT – Light;
 - (g) RURZ – Rural Zones;
 - (h) GRUZ – General Rural Zone;
 - (i) MINZ – Mineral Extraction Zone;
 - (j) Any other parts of the appeal that are affected by or related to the above.
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 appropriate use and development, particularly 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 and uses 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's position as to whether it supports, opposes or conditionally opposes a specified relief is set out in Appendix 1.
- 6. GDC's reasons for supporting a relief where specified in Appendix 1 are because the relief:
 - (a) will promote the sustainable management of natural and physical resources within the Grey District, and is therefore consistent with Part 2 and other provisions of the RMA;
 - (b) will meet the reasonably foreseeable needs of future generations;
 - (c) will enable the social, economic and cultural wellbeing of the people of the Grey District;

- (d) will facilitate the efficient use and development of natural and physical resources;
 - (e) will avoid, remedy or mitigate actual or potential adverse effects on the environment;
 - (f) is 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 further specific reasons where set out in Appendix 1 (without limiting the general reasons above).
7. GDC further notes that similar relief is sought by other appellants and consistency between the other similar appeals is supported.
8. GDC's reasons for opposing a relief where specified in Appendix 1 are because the relief:
- (a) 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) will not meet the reasonably foreseeable needs of future generations;
 - (c) will not enable the social, economic and cultural wellbeing of the people of the Grey District;
 - (d) will not facilitate the efficient use and development of natural and physical resources;
 - (e) will not avoid, remedy or mitigate actual or potential adverse effects on the environment;
 - (f) 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 further specific reasons where set out in Appendix 1 (without limiting the general reasons above).
9. GDC's reasons for conditionally opposing a relief are set out in Appendix 1. Where GDC has conditionally opposed a relief, GDC may revisit its position and support the relief if the matters signalled in Appendix 1 are addressed by the appellant (to GDC's satisfaction). GDC, however, reserves the right to oppose the relief for the general reasons set out at paragraph 8.

Alternative dispute resolution

10. 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 Tāiko Critical Minerals Limited

#	TTPP Provisions	Relief sought by the appellant	Grey District Council's position	Further Reasons for Grey District Council's Position
1.	Strategic Directions Overview Paragraph 3, subpoint 2	Retain wording as notified in the TTPP to ensure the objectives and policies of other chapters in the TTPP are consistent with the Strategic Directions.	Support	
2.	LBPP-O2 and LBPP-O3	Amend to refer to Primary Production and not "land based primary production" to ensure mining is not excluded (as per the definition section).	Conditionally oppose	GDC generally supports taking an enabling approach to mineral extraction. However, the relief sought needs to be consistent with higher order instruments, in particular, the National Policy Statement for Highly Productive Land and appropriate for ensuring a balance between farming activities and mineral extraction. GDC may revisit its position if further particulars are provided (satisfactory to GDC) to address these matters.
3.	MIN-P1 – MIN-P5	Delete and retain MIN-O2 – MIN-O6 as notified in the TTPP as objectives, incorporating changes requested by Tāiko in original submission 493 (page 12 of S493). Further express recognition required that offsetting and compensation are appropriate ways to manage effects.	Support	
4.	NENV-O1 NENV-P1 – P2	Delete and retain NENV-O1, NENV O3 and O4 as notified in the TTPP, incorporating changes requested by Tāiko in original	Support	

		submission 493 (page 12 of S493) which requested recognition of the functional and operational need and a consenting pathway for mineral activities.		
5.	INF - R11	Delete.	GDC is not interested in this part of the proceeding.	
6.	HH-P6	Retain wording as notified in the TTPP and insert reference to mineral extraction activities.	GDC is not interested in this part of the proceeding.	
7.	Entire Chapter ECO-O1 – ECO-O4 ECO-P1 – P10 ECO-R1 – R11	Retain wording as notified in the TTPP, incorporating changes requested Tāiko in original submission 493 (pages 15-16 of S493), including particularly to include specific recognition of operational and functional need of activities to be located in an area, and removal of restrictive wording such as "minimise", "restrict" and "preserve" and replace with "management" of significant effects.	Conditionally oppose all reliefs except the relief to add the following wording to ECO-O1 which is supported <i>“when considering resource consent applications which have effects on ecosystems and indigenous biodiversity, have</i>	GDC considers the bundled reliefs under this chapter require further particularisation and should be set out separately with specific wording so that they can be considered. GDC may revisit its position if such particulars and wording (satisfactory to GDC) are provided.

			<p><i>regard to the protection afforded to other similar ecosystems and indigenous biodiversity within public conservation land.”</i></p> <p>GDC further notes its own appeal in respect of ECO-R4 and prefers its own appeal point in the event of inconsistency</p>	
8.	NFL-P2, NFL-P3, NFL-P4 NFL-R11	Retain NFL-P2-3 (now NFL-P3-P4) as notified in the TTPP, as requested by Tāiko in original submission 493 (page 16 of S493). Amend NFL-R11 to provide for mineral extraction outside of MINZ as a restricted discretionary activity	GDC is not interested in this part of the proceeding.	
9.	NC-O3 NC-P2-P3	Amend provisions to ensure activities (such as mining) operational and functional needs are expressly provided for, as requested by Tāiko in original submission 493 (page 17 of S493).	GDC is not interested in this part of the proceeding.	

10.	CE-O1 and CE-O4 CE-P2 – P7 CE-R4 CE-R11, R16, R18	Retain wording as notified in the TTPP, incorporating changes requested by Tāiko in original submission 493 (pages 17-18 of S493). Amend CE-R11, R16 and R18 to include mineral extraction.	Support. GDC notes its own appeal in respect of CE-R4 and prefers its own appeal point in the event of inconsistency.	
11.	Entire chapter EW-R1 – R4	Amend provisions in chapter to ensure it is clear that the earthworks chapter does not apply to mineral extraction, exploration, prospecting and ancillary activities in any zone. Delete subpoint (g) within EW-R1. Delete subpoint (a) within EW-R2. Delete subpoint 5 within EW-R3. Delete subpoint (a) within EW-R4.	Conditionally Oppose GDC notes its own appeal in respect of EW-R4 and prefers its own appeal point in the event of inconsistency	GDC is supportive in principle of an enabling approach to earthworks associated with mineral activities however further particulars about the proposed structure and its consequences for the TPP are required along with specific wording for amended provisions. The subpoint lettering/numbering does not appear to be accurate. GDC may revisit its position if these matters are addressed (to its satisfaction) in the proceedings.
12.	LIGHT-O2 LIGHT-P1, P3 LIGHT-R4, R5	Retain wording as notified in the TTPP, incorporating changes requested by Tāiko in original submission 493 (page 18 of S493).	Support in relation to LIGHT – R5. GDC is not interested in the remainder of the	

			<p>relief (LIGHT O2, LIGHT P1 and P3, LIGHT – R4 AND R5) save to the extent that they affect LIGHT R5.</p> <p>GDC notes its own appeal in relation to Light – R5 and prefers its own appeal point in the event of inconsistency</p>	
13.	NOISE-R2(10), NOISE-R5 – R9, R11	Retain wording as notified in the TTPP (R5, R6 and R11), incorporating changes requested by Tāiko in original submission 493 (page 18 of S493).	<p>GDC is not interested in this part of the proceedings.</p> <p>GDC notes its own appeal in respect of Noise R3 and prefers its own appeal point in the event of inconsistency with</p>	

			the reliefs sought by the appellant.	
14.	RURZ-O1, RURZ-O5 RURZ-P6, RURZ-P22 – P26	Retain wording as notified in the TTPP, incorporating changes requested by Tāiko in original submission 493 (page 22 of S493). The reference to primary production (as defined to include mining activities) and not land based primary production (which excludes mining activities) should be retained or an exception made for P6 given mining is a temporary activity.	Conditionally Oppose	GDC supports an enabling approach to mining activities in principle, however, it is unable to support this relief in general and unspecified terms. GDC may revisit its position if specific wording (satisfactory to GDC) is provided during the appeal process.
15.	GRUZ R10 – R11, GRUZ-R17, R24 (now deleted) R25	Retain wording as notified in the TTPP, incorporating changes requested by Tāiko in original submission 493 (pages 22-23 of S493).	Support GDC notes its own appeal in respect of GRUZ-R11 and prefers its own appeal point in the event of inconsistency	
16.	Entire Chapter MINZ-O1, MINZ-O2 MINZ-P1, MINZ-P2, MINZ-P3, MINZ-P4, MINZ-P5, MINZ-P6, MINZ-P7, MINZ-P8 MINZ-R2, MINZ-R3, MINZ-R6, MINZ-R7	Retain wording as notified in the TTPP, incorporating changes requested by Tāiko in original submission 493 (pages 23-34 of S493).	Support	

17.	Appendix Thirteen: Principles and Process for Significant Natural Area Identification	Delete	GDC is not interested in this part of the proceedings.	
18.	Appendix Fourteen: Principles for Biodiversity Offsetting	Delete	GDC is not interested in this part of the proceedings.	
19.	Appendix Fifteen: Principles for Biodiversity Compensation	Delete	GDC is not interested in this part of the proceedings.	
20.	Various	Additional generalised relief (relevant to the parts of the proceeding that GDC is interested in) where amended wording for the provisions is not specified.	Conditionally oppose	GDC is unable to support relief in general and unspecified terms but may revisit its position if specific wording (satisfactory to GDC) is provided during the appeal process.