

**IN THE ENVIRONMENT COURT OF NEW ZEALAND
CHRISTCHURCH REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA
ŌTAUTAHI ROHE**

ENV-2025-CHC-000100
and all other file numbers as listed
in Appendix A attached to this
memorandum

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER of appeals under clause 14 of Schedule 1 of the RMA
against decisions of the Te Tai o Poutini Plan Committee
on the Te Tai o Poutini Plan

BETWEEN **JOHN CURRIE** and all other appellants as listed in
Appendix A attached to this memorandum

Appellants

**MEMORANDUM OF COUNSEL FOR TE TAI O POUTINI PLAN COMMITTEE
REGARDING MEDIATION CASE MANAGEMENT
14 April 2026**

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AND

TE TAI O POUTINI PLAN COMMITTEE

Respondent

MAY IT PLEASE THE COURT

- 1 This memorandum seeks directions on behalf of Te Tai o Poutini Plan Committee (**TTPP Committee**) in relation to mediations on the Te Tai o Poutini Plan (**TTPP**).
- 2 The TTPP Committee indicated in its case management memorandum dated 3 March 2026 that mediations on the TTPP would start from May 2026. The Court directed in its Minute dated 10 March 2026 that mediation be scheduled for dates after Monday 4 May 2026. Leave was granted in that minute for any party to seek other (or amended) directions.

Proposed mediation timetable

- 3 Counsel for the TTPP Committee has prepared a proposed mediation timetable as set out in **Appendix B** to this memorandum in consultation with the Environment Court's mediation manager. This timetable has mediations starting from 12 May 2026.
- 4 Unless otherwise indicated, the location for the mediations will be a venue on the West Coast to be determined later.
- 5 While care has been taken to avoid scheduling mediation for dates when parties are known to be unavailable, counsel acknowledges that it has not been possible to meet all availability constraints in setting this timetable.
- 6 The timetable also differs from the schedule indicated in the 3 March Case management memorandum. This has largely been to accommodate availability of parties.

Position papers, mediation agendas, reporting memorandum

- 7 The Court's Minute dated 10 March 2026 makes provision for position papers, mediation agendas and reporting memoranda.¹ These directions are repeated as directions sought in this memorandum so that all directions relevant to mediation can be found in one place.

¹ Minute dated 10 March 2026 at [8].

- 8 For simplicity, the proposed mediation timetable includes the dates for serving position papers but does not include the dates for mediation agendas or reporting memorandum.
- 9 Counsel notes that for practical and administrative reasons, it is likely that position papers will be provided to parties electronically by way of an editable SharePoint link. This will allow all parties to update the relevant field of the position paper and avoid the need to combine separate documents with separate party positions.

Preliminary notice of attendance

- 10 Early indication from parties regarding mediation attendance is necessary due to the nature and scale of the mediations. Counsel for the TTPP Committee seek directions that each party, on the basis of the proposed mediation timetable, confirm:
- (a) Whether they will attend each mediation, to which they are a party, in person or remotely²; and
 - (b) If attending in person, the number of persons attending each mediation on behalf of that party.
- 11 Counsel notes that the Court's directions on 10 March require parties to seek leave to attend mediation remotely.
- 12 Notwithstanding the above, Counsel seeks directions that the parties confirm their proposed attendance by email to counsel for the TTPP Committee, copying in the Court's mediation manager, Jennifer Gerritsen.
- 13 The preliminary indication of attendance for mediation topics will allow for venues for each mediation to be confirmed.
- 14 Counsel understand that formal notice of each mediation will subsequently be provided by the Court. This will confirm the venue for the relevant mediation topic.

² Note that if remote attendance is sought by a party, that party must apply to Commissioner Wilkinson for leave to attend remotely.

Venue

- 15 A number of venues on the West Coast are being considered for mediations, depending on how many people are attending the mediation in person.
- 16 For large mediations, it may be appropriate for mediation to be held in the West Coast Events Centre located in Shantytown Heritage Park. Please note that the Events Centre is located approximately 20 minutes from Greymouth and that there are restraints on the availability of food at this location. Parties are advised that they will need make arrangements for food for mediation days held at the Events Centre.
- 17 For smaller mediations, appropriate locations for mediation may include the Ashley Hotel and the St Johns building, both in Greymouth.
- 18 While the intention is for mediations to be held primarily in Greymouth or Hokitika, counsel considers that mediation of the Topic 19: Buller Coalfield Zone Subtopic should occur in Westport, due to the confined nature of this topic.

Length of mediation days

- 19 Counsel for the TTPP Committee acknowledge that many parties and counsel will be required to travel to attend mediation on the West Coast. Counsel propose that mediations beginning on Mondays start at 12:00 pm to allow parties to travel to Greymouth via the 8:45 am flights from Christchurch to Hokitika (landing at approximately 9:30 am).
- 20 Similarly, it is proposed that the final mediation day for each week be scheduled to finish no later than 4:00 pm, to allow parties to travel via the Hokitika to Christchurch flight departing at 5:40 pm.

Provision for electronic signing

- 21 Counsel for the TTPP Committee consider that provision for electronic signing of mediation documents (including mediation agreements) will be beneficial. Counsel seek directions that each party is to provide a digital copy of the electronic signature of a person authorised to sign such documents on behalf of that party to counsel for the TTPP Committee to allow for electronic signing.
- 22 For the avoidance of doubt, these electronic signatures will only be used by counsel for the TTPP Committee to sign documents relating to TTPP

mediations on parties' behalf where they have expressly stated their agreement. Electronic signatures will not be used for any other purpose.

Directions sought

- 23 The TTPP Committee respectfully seeks the following directions:
- (a) a direction confirming the proposed mediation timetable set out in Appendix B of this memorandum;
 - (b) a direction that the following existing directions be confirmed:
 - (i) parties may seek leave from the Commissioner to appear at mediation remotely;³
 - (ii) position papers prepared by the TTPP Committee are to be served on all parties in each topic 20 working days prior to commencement of each mediation topic;⁴
 - (iii) all other parties are to populate the position paper with their position for mediation and serve it on all parties 10 working days prior to mediation for each topic;⁵
 - (iv) mediation agendas are to be provided to the Commissioner by the Committee (after consulting with the other parties) five working days prior to the mediation for each topic;⁶
 - (v) any party may seek directions that "will say" statements be provided for a particular mediation topic;⁷
 - (vi) a reporting memorandum (preferably joint) is to be filed by the parties to each mediation topic within 10 working days of the conclusion of the mediation for that topic;⁸ and
 - (vii) leave is granted to any party to seek other (or amended) directions.⁹

³ Minute dated 10 March 2026 at [8d].

⁴ Minute dated 10 March 2026 at [8f] and Memorandum of counsel for Te Tai o Poutini Plan Committee regarding case management dated 3 March 2026 at [35].

⁵ Minute dated 10 March 2026 at [8f] and Memorandum of counsel for Te Tai o Poutini Plan Committee regarding case management dated 3 March 2026 at [35].

⁶ Minute dated 10 March 2026 at [8e].

⁷ Minute dated 10 March 2026 at [8f] and Memorandum of counsel for Te Tai o Poutini Plan Committee regarding case management dated 3 March 2026 at [37].

⁸ Minute dated 10 March 2026 at [8g].

⁹ Minute dated 10 March 2026 at [8h].

- (c) a direction that service of position papers may be completed electronically by SharePoint link;
- (d) a direction that each party provide preliminary notice of attendance by confirming the matters set out at paragraph 10 of this memorandum with counsel for the TTPP Committee and the Court's mediation manager within 5 Working Days of the Direction;
- (e) a direction that the approach to mediation venues and length of mediation days is suitable; and
- (f) a direction requiring parties to provide a digital copy of the electronic signature of a person authorised to sign such documents on behalf of that party to counsel for the TTPP Committee for electronic signing of TTPP mediation documents.

Dated this 14th day of April 2026



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A H Balme / T M Ellis
Solicitor for Respondent

Appendix A – List of Appellants

- (ENV-2025-CHC-000100) Currie
- (ENV-2025-CHC-000101) Chorus New Zealand Limited & others
- (ENV-2025-CHC-000102) Scenic Hotel Group Limited
- (ENV-2025-CHC-000103) Birchfield Coal Mines Limited
- (ENV-2025-CHC-000104) New Zealand Coal and Carbon Limited
- (ENV-2025-CHC-000105) Young
- (ENV-2025-CHC-000107) CMP Kokiri Limited
- (ENV-2025-CHC-000108) Tāiko Critical Minerals Limited
- (ENV-2025-CHC-000110) Federated Farmers of New Zealand
- (ENV-2025-CHC-000111) Director-General of Conservation
- (ENV-2025-CHC-000112) Westland District Council
- (ENV-2025-CHC-000113) Robinson
- (ENV-2025-CHC-000114) Haddock Group Properties Limited
- (ENV-2025-CHC-000115) Tauranga Bay Holdings Limited
- (ENV-2025-CHC-000116) Te Kinga Estates Limited
- (ENV-2025-CHC-000117) Forest and Bird Protection Society
- (ENV-2025-CHC-000118) WMS Group (HQ) Limited
- (ENV-2025-CHC-000119) Robinson
- (ENV-2025-CHC-000120) Tranter & others
- (ENV-2025-CHC-000121) Bathurst Resources Limited
- (ENV-2025-CHC-000122) Groundswell New Zealand
- (ENV-2025-CHC-000123) Manawa Energy Limited
- (ENV-2025-CHC-000124) KiwiRail Holdings Limited
- (ENV-2025-CHC-000125) Buller Conservation Group
- (ENV-2025-CHC-000126) Bradley
- (ENV-2025-CHC-000127) Stewart

(ENV-2025-CHC-000128) McIntosh

(ENV-2025-CHC-000129) Boyd & others

(ENV-2025-CHC-000130) Grey District Council

(ENV-2025-CHC-000131) Buller District Council

(ENV-2025-CHC-000133) Westpower Limited

(ENV-2025-CHC-000134) Te Runanga o Makaawhio & others

(ENV-2025-CHC-000135) Johnston

(ENV-2025-CHC-000136) Coates & others

(ENV-2025-CHC-000138) Ridgeline 3 Investments Limited

(ENV-2025-CHC-000139) Transpower New Zealand Limited

Appendix B – Proposed mediation timetable

Key:

- Mediation days are shown in **blue**
- Dates for the TTPP Committee to serve position papers on other parties (for their population) are shown in **green**
- Dates for parties to serve the populated position paper on all other parties shown in **orange**

April 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
		1	2	3 Good Friday	4	5
6 Easter Monday	7	8	9	10 Topic 15: Committee position paper due	11	12
13	14	15	16	17	18	19
20	21	22	23 Topic 14: Committee position paper due	24 Topic 15: Party position paper due	25 Anzac Day	26
27 Anzac Day Observed	28	29	30			

May 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
				1	2	3
4	5	6	7	8 Topic 14: Party position paper due	9	10
11	12 Topic 15: Strategic Directions	13 Topic 15: Strategic Directions	14 Topic 15: Strategic Directions	15 Topic 20: Committee position paper due	16	17
18	19	20	21	22	23	24
25 Topic 14: Cross Plan and Topic 15: SD - Strategic Directions	26 Topic 14: Cross Plan and Topic 15: SD - Strategic Directions (Forest and Bird not available)	27 Topic 14: Cross Plan and Topic 15: SD - Strategic Directions	28 Topic 14: Cross Plan and Topic 15: SD - Strategic Directions (Forest and Bird not available)	29 Topic 14: Cross Plan and Topic 15: SD - Strategic Directions Topic 22: Committee position paper due Topic 20: Party position paper due	30	31

June 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
1 Kings Birthday	2	3 Topic 14: Cross Plan (KiwiRail relief only) REMOTE Topics 29 and 10: Committee position paper due	4 Topics 23 and 11: Committee position paper due	5	6	7
8	9	10	11	12 Topic 18: Committee position paper due	13	14
15 Topic 22: Party position paper due	16 Topic 20: Mineral Extraction: Mineral Extraction Zone Subtopic	17 Topic 20: Mineral Extraction: Mineral Extraction Zone Subtopic Topics 29 and 10: Party position paper due	18 Topic 20: Mineral Extraction: Mineral Extraction Zone Subtopic Topics 23 and 11: Party position paper due	19 Topic 20: Mineral Extraction: Mineral Extraction Zone Subtopic Topic 19: Committee position paper due	20	21
22	23	24	25	26 Topic 18: Party position paper due	27	28

29	30 Topic 22: INF - Infrastructure					
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July 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
		1 Topic 22: INF - Infrastructure	2 Topic 29: ASW Topic 10: Temporary activities Topic 17: Committee position paper due	3 Topic 23: Transport Topic 11: Historic heritage Topic 19: Party position paper due	4	5
6	7	8	9	10 Matariki	11	12
13	14 Topic 18: Mineral Extraction	15 Topic 18: Mineral Extraction	16 Topic 18: Mineral Extraction	17 Topic 18: Mineral Extraction Topics 16 and 21: Committee position paper due Topic 17: Party position paper due	18	19

20	21 Topic 19: Mineral Extraction: Buller Coalfield Zone Subtopic	22 Topic 19: Mineral Extraction: Buller Coalfield Zone Subtopic	23 Topic 19: Mineral Extraction: Buller Coalfield Zone Subtopic	24 Placeholder topics: Committee position paper due	25	26
27	28	29	30	31 Topics 16 and 21: Party position paper due		

August 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
					1	2
3 Topic 17: Energy Topic 25: Committee position paper due	4 Topic 17: Energy	5 Topic 17: Energy	6 Topic 17: Energy	7 Topic 17: Energy Placeholder topics: Party position paper due	8	9
10	11	12	13	14 Topic 27: Committee position paper due	15	16
17 Topic 16: Light and Topic 21: Noise Topic 25: Party position paper due	18 Topic 16: Light and Topic 21: Noise	19 Topic 16: Light and Topic 21: Noise	20 Topic 16: Light and Topic 21: Noise	21	22	23

<p>24</p> <p>Placeholder for topics not resolved through direct discussions</p> <p>REMOTE</p>	<p>25</p> <p>Placeholder for topics not resolved through direct discussions</p> <p>REMOTE</p>	<p>26</p> <p>Placeholder for topics not resolved through direct discussions</p> <p>REMOTE</p>	<p>27</p> <p>Placeholder for topics not resolved through direct discussions</p> <p>REMOTE</p>	<p>28</p> <p>Placeholder for topics not resolved through direct discussions</p> <p>REMOTE</p> <p>Topic 27: Party position paper due</p>	<p>29</p>	<p>30</p>
<p>31</p> <p>Topic 30: Committee position paper due</p>						

September 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
	1 Topic 25: OSRZ - Open Space and Recreation Zones	2 Topic 25: OSRZ - Open Space and Recreation Zones	3 Topic 25: OSRZ - Open Space and Recreation Zones	4	5	6
7 Topic 24: Committee position paper due	8 Topic 26: Committee position paper due	9 Topic 28: Committee position paper due	10	11	12	13
14 Topic 27: SASM - Sites and Areas of Significance to Māori Topic 30: Party position paper due	15 Topic 27: SASM - Sites and Areas of Significance to Māori	16 Topic 27: SASM - Sites and Areas of Significance to Māori	17 Topic 27: SASM - Sites and Areas of Significance to Māori (1-5pm only)	18 Topic 27: SASM - Sites and Areas of Significance to Māori	19	20
21 Topic 31: Committee position paper due Topic 24: Party position paper due	22 Topic 26: Party position paper due	23 Topic 28: Party position paper due	24	25	26	27

28	29 Topic 30: CE - Coastal Environment	30 Topic 30: CE - Coastal Environment				
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October 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
			1 Topic 30: CE - Coastal Environment	2 Topic 30: CE - Coastal Environment Topic 32: Committee position paper due	3	4
5 Topic 31: Party position paper due	6 Topic 24: Natural Hazards	7 Topic 24: Natural Hazards Topic 26: Rural	8 Topic 28: SUB - Subdivision	9 Topic 28: SUB - Subdivision	10	11
12	13	14	15	16 Topic 33: Committee position paper due Topic 32: Party position paper due	17	18
19	20 Topic 31: Natural Character and the Margins of Waterbodies	21 Topic 31: Natural Character and the Margins of Waterbodies	22 Topic 31: Natural Character and the Margins of Waterbodies	23 Topic 31: Natural Character and the Margins of Waterbodies	24	25

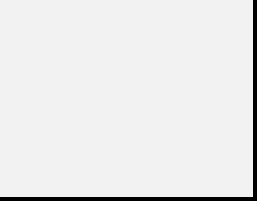
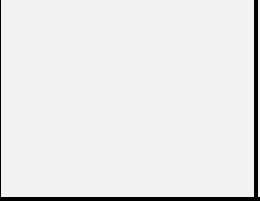
26 Labour Day	27	28	29	30 Topic 34: Committee position paper due	31	
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November 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
						1
2 Topic 33: Party position paper due	3 Topic 32: NFL - Natural Features and Landscapes	4 Topic 32: NFL - Natural Features and Landscapes	5 Topic 32: NFL - Natural Features and Landscapes	6 Topic 32: NFL - Natural Features and Landscapes	7	8
9	10	11	12	13 Topic 34: Party position paper due	14	15
16	17 Topic 33: Ecosystems and Indigenous Biodiversity	18 Topic 33: Ecosystems and Indigenous Biodiversity	19 Topic 33: Ecosystems and Indigenous Biodiversity	20 Topic 33: Ecosystems and Indigenous Biodiversity	21	22
23	24	25	26	27	28	29

30

Topic 34: Zones -
Maps and Specific
Site Zone



December 2026

Mon	Tue	Wed	Thu	Fri	Sat	Sun
	1 Topic 34: Zones - Maps and Specific Site Zone	2 Topic 34: Zones - Maps and Specific Site Zone	3 Topic 34: Zones - Maps and Specific Site Zone	4 Topic 34: Zones - Maps and Specific Site Zone	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25 Christmas Day	26 Boxing Day	27
28	29	30	31			

January 2027

Mon	Tue	Wed	Thu	Fri	Sat	Sun
				1 New Year's Day	2 Day after New Year's Day	3
4 Day after New Year's Day observed	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

February 2027

Mon	Tue	Wed	Thu	Fri	Sat	Sun
1	2	3	4	5	6 Waitangi Day	7
8 Waitangi Day observed	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28