

**BEFORE THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

ENV-2018-CHC-133

IN THE MATTER

of an appeal under to the
Environment Court against
decisions on the proposed
Queenstown Lakes District Council
District Plan (stage 1)

BETWEEN

**ROYAL FOREST AND BIRD
SOCEITY OF NEW ZEALAND
INC**

Appellant

AND

**QUEENSTOWN LAKES
DISTRICT COUNCIL**

Respondent

SECTION 274 NOTICE: THE ALPINE GROUP LIMITED

**GALLAWAY COOK ALLAN
LAWYERS
DUNEDIN**

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To: The Registrar
Environment Court
Christchurch

1. The Alpine Group Limited (“the Applicant”) wishes to be a party to the following proceedings:
 - (a) *Royal Forest and Bird Society of New Zealand Inc v Queenstown Lakes District Council* [ENV-2018-CHC-133]
2. The Applicant is a person who made a submission about the subject matter of the proceeding (OS 315) and has an interest in the proceedings greater than the public generally. The Applicant has a range of business interests including Minaret Station, Minaret Lodge and Alpine Helicopters, it therefore has an interest in the proceeding to the extent that it may affect these operations.
3. The Applicant is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
4. The Applicant is interested in the whole of the appeal which is subject to this proceeding.
5. The Applicant opposes the relief sought:
 - (a) Where it undermines the importance of rural land uses in retaining landscape character.
 - (b) Where it undermines the protection of agricultural land uses and for them to continue without undue constraints. It is not necessary for this to be removed from the plan in order to provide for management of land that is not being used for agricultural purposes, such as conservation and recreation purposes.
 - (c) Because some of the standards that the Appellant seeks to include relates to management of water quality which is addressed through the Otago Regional Plan and create unnecessary duplication.

- (d) The Applicant owns and operates Minaret Station and the proposed relief seeks to reduce the importance of farming within the District. The Applicant considers that the proposed relief will result in the inefficient use of its land.
 - (e) The relief seeks to restrict the provisions on clearing indigenous biodiversity at all costs which is not realistic for farming operations.
 - (f) The Proposed District Plan Stage 1 decisions version provides an appropriate framework for managing indigenous vegetation in a manner that is practical. Relief sought by the Applicant simply reintroduces the practical difficulties identified by the panel in the Decision.
 - (g) It does not recognise that development could occur within areas identified as Outstanding Natural Landscapes, particularly where environmental benefits are achieved.
6. The Applicant agrees to participate in mediation or alternative dispute resolution.



B Irving

Counsel for the Applicant
9 July 2018

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