

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH
I TE KŌTI TAIAO O AOTEAROA
ŌTAUTAHU ROHE**

ENV-2018-CHC-071

UNDER the Resource Management Act 1991

IN THE MATTER of an appeal under Clause 14(1) of Schedule 1 of the
Resource Management Act 1991 in relation to the
proposed Queenstown Lakes District Plan

BETWEEN **FRED VAN BRANDENBURG**

Appellant

AND **QUEENSTOWN LAKES DISTRICT COUNCIL**

Respondent

**NOTICE BY THE OTAGO REGIONAL COUNCIL OF PERSON'S WISH TO BE
PARTY TO PROCEEDINGS**

Section 274, Resource Management Act 1991

Dated 6 August 2019

ROSS DOWLING MARQUET GRIFFIN
SOLICITORS
DUNEDIN

Telephone: (03) 477 8046
Facsimile: (03) 477 6998
PO Box 1144, DX YP80015

Solicitor: N M Laws

**NOTICE BY THE OTAGO REGIONAL COUNCIL OF PERSON'S WISH TO BE
PARTY TO PROCEEDINGS**

To The Registrar
 Environment Court
 Christchurch

1 The **OTAGO REGIONAL COUNCIL**, wishes to be a party to the following proceeding:

1.1 The appeal brought by Fred van Brandenburg from the Queenstown Lakes District Council's decisions on the proposed Queenstown Lakes District Plan ("PDP").

2 The **OTAGO REGIONAL COUNCIL** is:

2.1 A local authority.

2.2 A person who made a submission on Chapter 3 Strategic Direction, Chapter 4 Urban Development and Chapter 27 Subdivision and Development.

3 The **OTAGO REGIONAL COUNCIL** is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991.

4 The **OTAGO REGIONAL COUNCIL** is interested in all of the proceedings.

5 Without derogating from paragraph 4, the **OTAGO REGIONAL COUNCIL** is particularly interested in the appeal so far as it relates to Chapter 27 and the default activity status for subdivisions.

6 The **OTAGO REGIONAL COUNCIL** opposes the relief sought because:

6.1 it does not promote sustainable management and therefore is contrary to Part 2 of the Act;

6.2 it does not give effect to the National Policy Statement on Urban Development Capacity;

6.3 it does not give effect to the Regional Policy Statement;

- 6.4 it does not give effect to the settled provisions of the Proposed Otago Regional Policy Statement;
 - 6.5 in particular it will not achieve urban growth and development in a well-designed, strategic and coordinated way;
 - 6.6 it will not ensure that urban growth and development is integrated effectively with adjoining urban and rural environments;
 - 6.7 it encourages undesirable urban sprawl and sporadic urban development;
 - 6.8 it will give rise to adverse effects through urban style development and residential activities occurring in rural areas; and
 - 6.9 it will lead to rural fragmentation.
- 7 The **OTAGO REGIONAL COUNCIL** agrees to participate in mediation or other alternative dispute resolution of the proceedings.



.....
N M Laws

Counsel for the Otago Regional Council

Date: 6 August 2019

Address for service of person wishing to be a party:

Ross Dowling Marquet Griffin
Solicitors
50 Princes Street (PO Box 1144 or DX YP80015)
Dunedin
Telephone: (03) 951 2360
Fax: (03) 477 6998
Contact person: N M Laws
Email: nathan.laws@rossdowling.co.nz