

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-000079

Under	the Resource Management Act 1991
In the matter of	an appeal under Clause 14(1) of Schedule 1 of the RMA in relation to the proposed Queenstown Lakes District Plan
Between	Otago Regional Council
	Appellant
And	Queenstown Lakes District Council
	Respondent

Notice of Te Anau Developments Limited wish to be party to proceedings pursuant to section 274 RMA

10 July 2018

Section 274 party's solicitors:
Maree Baker-Galloway | Rosie Hill
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700 | f + 64 3 450 0799
maree.baker-galloway@al.nz | rosie.hill@al.nz

**anderson
lloyd.**

To: The Registrar
Environment Court
Christchurch

- 1 Te Anau Developments Limited (**TAD**) wish to be a party pursuant to section 274 of the RMA to the following proceedings:

Otago Regional Council v Queenstown Lakes District Council (ENV-2018-CHC-000079) being an appeal against decisions of Queenstown Lakes District Council on the proposed Queenstown Lakes District Plan (**PDP**).

- 2 TAD is a person who made a submission about the subject matter of the proceedings.
- 3 TAD is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 4 TAD is interested in all of the proceedings.
- 5 Without derogating from the generality of the above, TAD is interested in the following particular issues:
 - (a) Rule 6.1 27.10 (formerly 27.9.2 of the notified Proposed District Plan).
 - (b) Chapter 28, Natural Hazards, of the Proposed District Plan.
 - (c) The relief sought for more rigorous Objectives, Policies and other provisions for the avoidance and reduction of natural hazard risks.
 - (d) Relief sought to include Objectives, Policies and other provisions applying a precautionary approach to natural hazard risk.
- 6 TAD opposes the relief sought because:
 - (a) The relief sought for more rigorous avoidance of risks from natural hazards should be more clearly particularised to specific areas or where concerns of natural hazard risk are limited to 'significant risks'.
 - (b) The relief will not achieve the higher order provisions of the PDP; the Otago Regional Policy Statement, and Part 2 of the Act.
 - (c) The relief is inconsistent with that set out in the TAD appeal.

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

Dated this 10th day of July 2018

Maree Baker-Galloway

Maree Baker-Galloway/Rosie Hill
Counsel for the section 274 party

Address for service of person wishing to be a party

Anderson Lloyd

Level 2, 13 Camp Street

PO Box 201

Queenstown 9300

Phone: 03 450 0700 Fax: 03 450 0799

Email: maree.baker-galloway@al.nz | rosie.hill@al.nz

Contact persons: Maree Baker-Galloway | Rosie Hill

Advice

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