## BEFORE THE ENVIRONMENT COURT AT CHRISTCHURCH I TE KŌTI TAIAO O AOTEAROA ŌTAUTAHI ROHE

ENV-2018-CHC-53

IN THE MATTER

of an appeal under section 120 of the Resource Management

Act 1991

BETWEEN

FEDERATED FARMERS OF NEW ZEALAND

**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 Sange 2018

ROSS DOWLING MARQUET GRIFFIN SOLICITORS DUNEDIN

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## NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS Section 274, Resource Management Act 1991

- To The Registrar
  Environment Court
  Christchurch
- 1 The **OTAGO REGIONAL COUNCIL**, wishes to be a party to the following proceedings:
  - 1.1 The appeal dated 28 May 2018 by Federated Farmers of New Zealand from the Queenstown Lakes District Council's ("QLDC") 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 6 Landscapes, Chapter 21 Rural Zone, Chapter 33 Indigenous Vegetation and Biodiversity provisions of the PDP.
- 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.
- Without derogating from paragraph 4, the **OTAGO REGIONAL COUNCIL** is particularly interested in the following provisions:
  - 5.1 Policy 3.3.27;
  - 5.2 Policy 6.3.12; and
  - 5.3 Policy 6.3.26.
- The OTAGO REGIONAL COUNCIL opposes the relief sought because—

Policy 3.3.27

6.1 The relief sought is contrary to Part 2 of the Act.

6.2 The relief sought is contrary to QLDC's obligations under Section 30 of

the Act.

6.3 The relief fails to give effect to the Operative Regional Policy Statement.

6.4 The relief is inconsistent with and fails to give effect to the settled

provisions of the Proposed Otago Regional Policy Statement.

6.5 The relief, if granted, will threaten indigenous vegetation and indigenous

biological diversity.

6.6 The relief, if granted, will facilitate the spread of pest species.

6.7 The relief, if granted, will be inconsistent with the Regional Pest

Management Plan.

Policies 6.3.12 and 6.3.26

6.8 The relief sought is contrary to Part 2 of the Act.

6.9 The relief sought fails to give effect to the Operative Regional Policy

Statement.

6.10 The relief sought is not consistent with and fails to give effect to the

settled provisions of the Proposed Otago Regional Policy Statement.

6.11 The relief, if granted, would fail to protect the values of outstanding

natural features, outstanding natural landscapes and rural landscapes.

6.12 The relief, if granted, would allow inappropriate use and development of

outstanding natural features, outstanding natural landscapes and rural

landscapes.

7 The OTAGO REGIONAL COUNCIL agrees to participate in mediation or other

alternative dispute resolution of the proceedings.

A J Logan

Solicitor for the Otago Regional Council

Date: 5 July 2018

## Address for service of person wishing to be a party:

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