

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

**ENV-2018-CHC-127**

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**IN THE MATTER** of an appeal under Clause 14 of the First Schedule of the  
Resource Management Act 1991

**BETWEEN** **QUEENSTOWN PARK LIMITED**

Appellant

**AND** **QUEENSTOWN LAKES DISTRICT COUNCIL**

Respondent

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

***Section 274, Resource Management Act 1991***

**Dated 10 July 2018**

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ROSS DOWLING MARQUET GRIFFIN  
SOLICITORS  
DUNEDIN

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

Solicitor: A J Logan

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

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**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 19 June 2018 by Queenstown Park Limited 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, Chapter 6 Landscapes and Rural Character, Chapter 21 Rural Zone, Chapter 27 Subdivision and Chapter 33 Indigenous Vegetation and Biodiversity.

**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 is Part A Queenstown Park Special Zone and the amendments sought to Chapter 3, Chapter 4, Chapter 6, Chapter 21, Chapter 27, Chapter 30, and Chapter 33.

**6** The **OTAGO REGIONAL COUNCIL**—

6.1 Opposes the relief sought in Part A because:

(1) it does not promote sustainable management of natural and physical resources and is therefore contrary to Part 2 of the Act;

(2) it does not give effect to the Regional Policy Statement;

- (3) it does not give effect to the Proposed Otago Regional Policy Statement;
- (4) it is inappropriate zoning and use of the land having regard in particular to:
  - the identified significant natural areas;
  - the outstanding natural landscape;
  - the recreational values of land and the Remarkables.

6.2 Opposes the amendments sought to Chapter 3 Strategic Direction because:

- (1) they do not promote sustainable management and therefore contrary to Part 2 of the Act;
- (2) they do not give effect to the Regional Policy Statement;
- (3) they do not give effect to the Proposed Otago Regional Policy Statement;
- (4) they fail to protect outstanding natural landscapes, outstanding natural features and rural landscapes and their values;
- (5) they enable residential and other activities in rural areas which will result in adverse effects on the environment, including reverse sensitivity and rural fragmentation;
- (6) they derogate from a strategic and coordinated approach to Urban Growth and Development;
- (7) they will enable an inappropriate level of non-rural activities in rural areas.

6.3 Opposes the relevant amendments proposed in the appeal to Chapter 4 Urban Development because:

- (1) they do not promote sustainable management and therefore are contrary to Part 2 of the Act;
- (2) they do not give effect to the Regional Policy Statement;

- (3) they do not give effect to the Proposed Otago Regional Policy Statement;
- (4) they do not ensure Urban Growth and Development is achieved in a strategic and coordinated manner;
- (5) they do not ensure that Urban Growth and Development integrates effectively with adjoining urban and rural environments;
- (6) they undermine the nature and purpose of urban growth boundaries;

6.4 Opposes the relevant amendments proposed in the appeal to Chapters 6, 21 and 27 because:

- (1) they do not promote sustainable management and therefore contrary to Part 2 of the Act;
- (2) they do not give effect to the Regional Policy Statement;
- (3) they do not give effect to the Proposed Otago Regional Policy Statement;
- (4) they fail to protect outstanding natural landscape, outstanding natural features and rural landscapes and their values;
- (5) they enable residential and other activities in rural areas which will result in adverse effects on the environment, including reverse sensitivity and rural fragmentation;
- (6) they derogate from a strategic and coordinated approach to Urban Growth and Development;
- (7) they will enable an inappropriate level of non-rural activities in rural areas.

6.5 Opposes the relevant amendments proposed in the appeal to Chapter 33 because:

- (1) they do not promote sustainable management and therefore are contrary to the obligations of the respondent in accordance with Section 6 and Section 30 of the Act;

- (2) they do not give effect to the Regional Policy Statement;
- (3) they do not give effect to the Proposed Otago Regional Policy Statement;
- (4) they are inconsistent with the overarching provisions in Chapter 3 Strategic Direction;
- (5) they fail to protect indigenous vegetation and maintain indigenous biological diversity.

7 The **OTAGO REGIONAL COUNCIL** agrees to participate in mediation or other alternative dispute resolution of the proceedings.

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A J Logan

Solicitor for the Otago Regional Council

Date: 10 July 2018

**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 2363  
Fax: (03) 477 6998  
Contact person: A J Logan  
Email: [alastair.logan@rossdowling.co.nz](mailto:alastair.logan@rossdowling.co.nz)