IN THE ENVIRONMENT COURT AT CHRISTCHURCH

I TE KŌTI TAIAO O AOTEAROA KI ŌTAUTAHI

ENV-2024-CHC-39

UNDER The Resource Management Act 1991

(the Act)

IN THE MATTER of an appeal pursuant to clause 14 of

Schedule 1 of the Act

BETWEEN ENVIRONMENTAL DEFENCE

SOCIETY INCORPORATED

Appellant

AND OTAGO REGIONAL COUNCIL

Respondent

AND OTAGO WATER RESOURCE USER

GROUP INCORPORATED

Section 274 Party

NOTICE OF WISH TO BE PARTY TO PROCEEDING PURSUANT TO SECTION 274 OF THE ACT

5 JUNE 2024



GALLAWAY COOK ALLAN LAWYERS

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NOTICE OF WISH TO BE PARTY TO PROCEEDING PURSUANT TO SECTION 274 OF THE ACT

To: Registrar

Environment Court

Christchurch

- 1. Otago Water Resource User Group Incorporated (**OWRUG**) wish to be a party to the following proceeding: *Environmental Defence Society Incorporated v Otago Regional Council*, ENV-2024-CHC-39.
- OWRUG made submissions and further submissions in relation to the non-freshwater part of the PORPS, which is the subject of this proceeding (OS00235 and FS00235).
- 3. OWRUG is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
- 4. OWRUG is interested in part of the proceedings.
- 5. OWRUG has a particular interest in the following issues:
 - (a) Definitions: Significant Natural Areas.
 - (b) Integrated Management: IM-04 Climate Change; IM-P10 climate change adaptation and mitigation; IM-P12 contravening limits.
 - (c) Energy, infrastructure and transport
- 6. OWRUG oppose the relief sought because:
 - (a) The changes sought to the definition of SNA are inconsistent with higher order direction. There is no justification for expanding the definition as sought
 - (b) Amendments to the IM provisions will undermine their intent and limit the options available for climate change adaption and mitigation.
 - (c) Changes sought to he EIT-INF provisions may affect the process for reconsenting existing community-scale irrigation and

stockwater infrastructure that is owned and operated by OWRUG members.

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

Date: 6 June 2024

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Bridget Irving

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