

**In the Environment Court of New Zealand
Christchurch Registry**

**I Te Kōti Taiao O Aotearoa
Ōtautahi Rohe**

ENV-2024-CHC-26

Under of the Resource Management Act 1991 (**RMA**)
In the matter of an appeal under cl 14 of the RMA

Between **Royal Forest and Bird Protection Society of New
Zealand Incorporated**
Appellant

And **Otago Regional Council**
Respondent

**Notice of wish to be a party to an appeal on
behalf of Queenstown Lakes District Council**

MC.

Counsel acting:
Janette Campbell
Barrister
Bankside Chambers
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Instructing solicitor:
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Notice of person's wish to be party to proceedings

To: The Registrar of the Environment Court at Christchurch

And to: The Respondent

Name of Person who wishes to be a Party

1 Queenstown Lakes District Council (**Council**) wishes to be a party to the following proceeding:

(a) An appeal by Royal Forest and Bird Protection Society Incorporated (**Appellant**) (ENV-2024-CHC-26) against the decision of Otago Regional Council on the Proposed Otago Regional Policy Statement (**pORPS**).

2 The Council is a local authority.

Trade Competition

3 The Council is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (RMA).

The Proceeding

4 The Council is interested in the parts of the proceeding that relate to:

(a) Natural features and landscapes (including highly valued natural features and landscapes);

(b) Regionally significant infrastructure;

(c) Land and Freshwater; and

(d) Ecosystems and indigenous biodiversity.

Particular issues and reasons

5 Without derogating from paragraph 4, the Council generally supports the Appellant's relief sought in relation to:

(a) Natural features and landscapes; and

(b) Regionally significant infrastructure.

6 Without derogating from paragraph 4, the Council opposes the Appellant's relief sought in relation to:

(a) Land and Freshwater; and

(b) Ecosystems and indigenous biodiversity.

- 7 The Council opposes the above relief sought on the basis that it creates uncertainty (including with respect to administration and monitoring and enforcement) when managing land and freshwater, ecosystems, and biodiversity.
- 8 More broadly, the Council is responsible for the preparation of a District Plan for the Queenstown Lakes District that gives effect to the pORPS. The Council has recently reviewed its District Plan and this process is ongoing.
- 9 Accordingly, the Council remains interested in the final form of the appealed provisions to ensure that there are no inappropriate outcomes that will limit the Council's ability to properly manage the use, development, or protection of natural and physical resources in its district through the District Plan.

Dispute Resolution

- 10 The Council agrees to participate in mediation or other alternative dispute resolution of the proceeding.

Date: 7 June 2024



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J C Campbell / B A Watts
Counsel for Queenstown Lakes District Council

This document is filed by Brandon Andrew Watts of Meredith Connell, solicitor for the Appellant. The address for service on the Appellant is Level 7, MC Centre, 8 Hardinge St, Auckland, New Zealand.

Documents for service on the Appellant may be left at that address for service or may be:

- (a) posted to the solicitor at PO Box 90750, Victoria Street West, Auckland 1142, New Zealand;
- (b) left for the solicitor at a document exchange for direction to DX CP24063;
- (c) emailed to janette@campbell.legal, with a copy sent to brandon.watts@mc.co.nz