

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

ENV-2019-CHC-095

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

BETWEEN **HENLEY DOWNS FARM HOLDINGS LIMITED AND HENLEY
DOWNS LAND HOLDINGS LIMITED**

Appellant

AND **QUEENSTOWN LAKES DISTRICT COUNCIL**

Respondent

**NOTICE BY THE OTAGO REGIONAL COUNCIL OF PERSON'S WISH TO BE
PARTY TO APPEAL BY HENLEY DOWNS FARM HOLDINGS LIMITED AND
HENLEY DOWNS LAND HOLDINGS LIMITED
Section 274, Resource Management Act 1991
Dated 4 June 2019**

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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 7 May 2019 by Henley downs Farm Holdings Limited and Henley Downs Land Holdings 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 and Chapter 6 Landscape and Rural Character and Chapter 25 Earthworks of the PDP.

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 the Appellant's appeal on Chapters 6 and 25.

6 The **OTAGO REGIONAL COUNCIL**—

6.1 Oppose the changes sought to Chapter 6 which:

(1) Relitigate matters which are the subject of Topic 1 and Topic 2 of the Stage 1 appeals;

(2) Fail to give effect to:

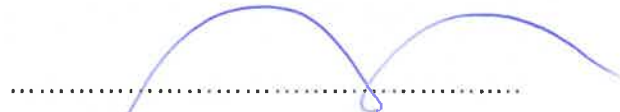
(i) Section 6(b) and Section 7(c) and (f) of the Act;

- (ii) The Operative and Proposed Regional Policy Statements;
- (iii) The settled objectives and policies of the PDP.

6.2 Opposes the relief sought to Chapter 25 because:

- (1) It does not promote sustainable management and is contrary to Part 2 of the Act;
- (2) It fails to give effect to Partially Operative Regional Policy Statement 2019 and the relevant provisions of the Operative Regional Policy Statement 1998;
- (3) It fails to give effect to the Proposed Regional Policy Statement;
- (4) It fails to give effect to the objectives and policies of the PDP;
- (5) It is inconsistent with the Regional Plan: Water for Otago;
- (6) It is inconsistent with the Regional Plan: Air for Otago;
- (7) If granted, the relief would fail to adequately manage earthworks.

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: 4 June 2019

Address for service of person wishing to be a party:

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