

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

**ENV-2019-CHC-062**

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

**BETWEEN** **WELL SMART INVESTMENT GROUP**

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 APPEAL BY WELL SMART INVESTMENT GROUP  
*Section 274, Resource Management Act 1991*  
Dated 4 June 2019**

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ROSS DOWLING MARQUET GRIFFIN  
SOLICITORS  
DUNEDIN

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Solicitor: A J Logan

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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 Well Smart Investment Group 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 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 Chapter 25 Earthworks.

6 The **OTAGO REGIONAL COUNCIL**—

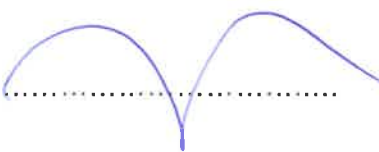
6.1 Opposes the relief sought because:

(1) It does not promote sustainable management and is contrary to Part 2 of the Act;

(2) It fails to give effect to the 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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