

In the Environment Court of New Zealand
Christchurch Registry

I Mua I Te Kōti Taiao O Aotearoa
Ōtautahi Rohe

ENV-2024-CHC-054

Under the Resource Management Act 1991 (**Act**)

In the matter of an appeal under clause 14(1) of Schedule 1 of the Act in relation to the variation to introduce Landscape Schedules 21.22 and 21.23 into Chapter 21 (Rural Zone) of the Queenstown Lakes District Proposed District Plan (**PDP**)

Between **Jeremy Burdon**

Appellant

And **Queenstown Lakes District Council**

Respondent

Notice of wish to be a party to proceedings pursuant to section 274 of the Act

26 August 2024

Diane Kenton's solicitors:

Maree Baker-Galloway | Laura McLaughlan
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348

p + 64 3 450 0700
maree.baker-galloway@al.nz | laura.mclaughlan@al.nz

**anderson
lloyd.**

To: The Registrar

Environment Court

Christchurch

- 1 Diane Kenton (**s 274 party**) wishes to be a party to the following proceedings, pursuant to section 274 of the Act:

Jeremy Burdon v Queenstown Lakes District Council
under clause 14 of schedule 1 of the Act in relation
to the Priority Area Landscape Schedules Variation
to the Queenstown Lakes PDP (**Variation**) (ENV-
2024-CHC-054) (**Appeal**).

- 2 The s 274 party is a person who made submission #139 and further submission #225 regarding the subject matter of the proceedings.
- 3 The s 274 party is a person who has an interest in the proceedings that is greater than that interest the general public has, because it has an interest in land located within the Hāwea South and North Grandview PA ONL Schedule, which is affected by the subject of the Appeal.
- 4 The s 274 party is not a trade competitor for the purposes of section 308C or s308CA of the RMA.
- 5 The s 274 party is interested in the Appeal in its entirety.
- 6 Without derogating from the generality of the above, the s 274 party is interested in the following particular issues, including that the Decision:
 - (a) Contains insufficient analysis and detail regarding the content of the Hāwea South and North Grandview PA ONL Schedule;
 - (b) Relies on the respective joint witness statements as having mostly resolved the content of each specific schedule. The Decision only recommends specific changes to four specific schedules, being 21.23.4, 21.22.15, 21.22.17 and 21.22.22, which is problematic as a number of the schedules were not tested at expert conferencing despite being the subject of submissions;¹and
 - (c) Fails to meaningfully engage with submissions regarding the content of the Hāwea Schedule and the Decision version content is incorrect.

¹ As stated at paragraph [12(b)] of *Jeremy Burdon v Queenstown Lakes District Council* (ENV-2024-CHC-054).

Relief sought

- 7 The s 274 party is interested in the relief sought in the Appeal, including that the Variation be amended to be consistent with the changes in the s 274 party's original submission #139 and further submission #225.
- 8 The s 274 party agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated this 26th day of August 2024

Maree Baker-Galloway

Maree Baker-Galloway/Laura McLaughlan
Counsel for Diane Kenton