BEFORE THE ENVIRONMENT COURT AT CHRISTCHURCH

I TE KŌTI TAIAO O AOTEAROA ŌTAUTAHI ROHE

ENV-2023-CHC-020

UNDER the Resource Management Act 1991

IN THE MATTER of an appeal under Clause 14(1) of Schedule 1 of the

Resource Management Act 1991

BETWEEN MEATS OF NEW ZEALAND LIMITED

Appellant

AND DUNEDIN CITY COUNCIL

Respondent

NOTICE BY THE OTAGO REGIONAL COUNCIL OF ITS WISH TO BE A PARTY TO PROCEEDING

Section 274 Resource Management Act 1991

Dated 13 April 2023

ROSS DOWLING MARQUET GRIFFIN Telephone: (03) 477 8046
SOLICITORS Facsimile: (03) 477 6998
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Solicitor: S J Anderson

NOTICE BY THE OTAGO REGIONAL COUNCIL OF ITS WISH TO BE A PARTY TO PROCEEDING

- To the Registrar
 Environment Court
 Christchurch
- The OTAGO REGIONAL COUNCIL wishes to be a party to the following proceedings:
 - 1.1. the appeal by Meats of New Zealand Limited dated 21 March 2023 being ENV-2023-CHC-020 from the Dunedin City Council's ("DCC") decisions on Variation 2 to its proposed Dunedin City District Plan ("2GP").
- 2. The OTAGO REGIONAL COUNCIL is:
 - 2.1. a local authority; and
 - 2.2. a person who made a submission about the subject matter of this proceeding.
- 3. The OTAGO REGIONAL COUNCIL is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 ("the Act").
- 4. The **OTAGO REGIONAL COUNCIL** is interested in all of the proceedings.
- 5. Without derogating from Paragraph 4, the **OTAGO REGIONAL COUNCIL** is interested in the following particular issues:
 - 5.1. landscape and rural amenity;
 - 5.2. expansion of the Allanton township into the rural zone;
 - 5.3. protection of high-class soils;
 - 5.4. stormwater management;
 - 5.5. wastewater management;
 - 5.6. potential effects on infrastructure, including Otago Regional Council drains and flood protection schemes.

- 6. The **OTAGO REGIONAL COUNCIL** opposes the relief sought because:
 - 6.1. the relief is not a strategic and coordinated form of urban growth and development;
 - 6.2. the relief will result in adverse effects on rural landscape and amenities;
 - 6.3. the relief does not constitute well designed urban growth and development;
 - 6.4. the relief will result in undesirable urban style sprawl and sporadic development of residential and associated activities;
 - 6.5. the relief will diminish real productivity;
 - 6.6. the relief will have adverse effects on the receiving environment;
 - 6.7. there is potential for adverse effects from stormwater and wastewater discharges on the receiving environment;
 - 6.8. the adverse effects on the receiving environment include adverse effects on ORC drainage and flood protection assets and their effective management;
 - 6.9. the relief does not give effect to and is not needed to give effect to the National Policy Statement on Urban Development;
 - 6.10. the relief does is contrary to and does not give effect to the National Policy Statement for Highly Productive Land;
 - 6.11. the relief does not give effect to the National Policy Statement for Freshwater Management;
 - 6.12. the relief does not give effect to the partially operative Regional Policy Statement 2019 and does not have regard to the proposed Otago Regional Policy Statement 2021:
 - 6.13. the relief does not give effect to the strategic objectives and strategic policies of 2GP;
 - 6.14. the relief sought could result in unacceptable effects on the environment;

- 6.15. the relief does not promote sustainable management and is contrary to Part 2 of the Act.
- 7. The **OTAGO REGIONAL COUNCIL** agrees to participate in mediation or any other alternative dispute resolution of the proceedings.

S J Anderson

(for Otago Regional Council)

Date: 13 April 2023

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List of Parties to be Served

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Meats of New Zealand Limited	Phil.Page@gallawaycookallan.co.nz