BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH

I TE KŌTI TAIAO O AOTEAROA
ŌTAUTAHI ROHE **ENV-2023-CHC-028**

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	**WENDY CAMPBELL** 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
SOLICITORS
DUNEDIN

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

To the Registrar
Environment Court
Christchurch

1. The **OTAGO REGIONAL COUNCIL** wishes to be a party to the following proceedings:

   1.1. the appeal by Wendy Campbell dated 21 March 2023 being ENV-2023-CHC-028 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. infrastructure issues including stormwater and wastewater;

   5.2. natural hazards including dam break, ground instability, historic mining hazards and flooding on and off site;

   5.3. impacts on landscape and amenity; and

   5.4. loss of highly productive land.

6. The **OTAGO REGIONAL COUNCIL** opposes the relief sought because:

6.1. this is not a strategic and coordinated form of urban growth and development;

6.2. the relief is not well-designed urban growth and development;

6.3. the relief will result in adverse effects on landscape and amenities;

6.4. the relief will result in the loss of highly productive land and diminished rural productivity;

6.5. the site is unsuitable because of its location within a dam break zone;

6.6. the land is susceptible to flooding and development has the potential to cause flooding offsite;

6.7. the land is unstable and is subject to historic mining hazards;

6.8. infrastructural issues, in particular stormwater and wastewater collection and disposal have not and cannot be satisfactorily addressed;

6.9. the relief does not have regard to the effects of climate change;

6.10. the development permitted by rezoning has potential to have adverse effects on water quantity and quality;

6.11. the relief does not give effect to and is not needed to give effect the National Policy Statement on Urban Development;

6.12. the relief does not give effect to the National Policy Statement for Freshwater Management;

6.13. the relief is contrary to and does not give effect to the National Policy Statement for Highly Productive Land;

6.14. the relief does not give to the partially operative Regional Policy Statement 2019 and does not have regard to the proposed Otago Regional Policy Statement 2021;

6.15. the relief does not give to the strategic objectives and strategic policies of 2GP;

6.16. the relief sought will result is unacceptable effects on the environment; and

6.17. 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.

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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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