

**IN THE HIGH COURT OF NEW ZEALAND
DUNEDIN REGISTRY**

**I TE KŌTI MATUA O AOTEAROA
ŌTEPOTI ROHE**

CIV-2021-412-000089

UNDER the Declaratory Judgments Act 1908 (the Act)
IN THE MATTER of an application under the Act
BETWEEN **OTAGO REGIONAL COUNCIL**
Plaintiff
AND **ROYAL FOREST AND BIRD PROTECTION SOCIETY
OF NEW ZEALAND INCORPORATED**
Defendant
AND **QUEENSTOWN LAKES DISTRICT COUNCIL**
Third Party

STATEMENT OF DEFENCE OF QUEENSTOWN LAKES DISTRICT COUNCIL

DATED: 26 OCTOBER 2021

DOH: 8-9 FEBRUARY 2022

 **Simpson Grierson**
Barristers & Solicitors

S J Scott
Telephone: +64-3-968-4018
Email: sarah.scott@simpsongrierson.com
DX CX10092
Private Bag 92518
Christchurch

The Third Party (Queenstown Lakes District Council) by its solicitor says:

1. The Plaintiff notified the Proposed Otago Regional Policy Statement (**PORPS**) on 26 June 2021. The Third Party made a submission on the PORPS.
2. The Plaintiff lodged a statement of claim seeking declarations on the PORPS on 3 September 2021
3. The Third Party admits paragraph 3(a), and admits paragraph 3(b) as far as the Plaintiff's responsibilities relating to the preparation of the PORPS are under ss 59 – 62 of the RMA. The Third Party denies s 63 is relevant.
4. The Third Party admits paragraphs 4 to 23 of the statement of claim.
5. In relation to the declarations sought in paragraph 24, the Third Party:
 - (a) denies sub-paragraph 24(1);
 - (b) denies sub-paragraph 24(2); and
 - (c) admits sub-paragraph 24(3).

Dated this 26th day of October 2021



Sarah Scott
Counsel for the Third Party

This statement of defence is filed by SARAH JANE SCOTT solicitor for Queenstown Lakes District Council and of the firm of Simpson Grierson.

The address for service of Queenstown Lakes District Council is at the offices of Simpson Grierson, Level 1, 151 Cambridge Terrace, Christchurch.

Documents for service on Queenstown Lakes District Council may be left at that address for service or may be -

- (a) posted to the solicitor at PO Box 874, Christchurch; or
- (b) left for the solicitor at a document exchange for direction to DX CX10092;
or
- (c) emailed to the solicitor at sarah.scott@simpsongrierson.com.