

BEFORE THE ENVIRONMENT COURT

ENV-2018-CHC-000039

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an appeal pursuant to Clause 14 of the
First Schedule to the Act in relation to the
proposed Southland Water and Land Plan

BETWEEN Alliance Group Limited

Appellant

AND Southland Regional Council

Respondent

**NOTICE OF REPRESENTATION AT PROCEEDINGS UNDER SECTION 274 OF THE RESOURCE
MANAGEMENT ACT 1991**

**To: The Environment Court
WX 11113 or PO Box 2069
Christchurch 8013, New Zealand
Attn: Case Manager - Christine McKee**

1. Z Energy Limited, BP Oil New Zealand Limited and Mobil Oil New Zealand Limited (the Oil Companies) wish to be a party to the proceedings between Alliance Group Limited (Appellant) and the Southland Regional Council (Respondent) in relation to the Respondent's decisions on submissions to the Proposed Southland Water and Land Plan (the pSWLP).
2. The Oil Companies are interested in the following parts of the proceedings:
 - Appeal points 10(a), 10(b) and 10(c) regarding Objectives 13, 13A, and 13B.
3. The Oil Companies lodged submissions on the pSWLP on the subject matter of the proceedings.
4. The Oil Companies are not trade competitors for the purposes of section 308D of the Resource Management Act 1991.
5. Within the Southland Region, the core activities of the Oil Companies relate to the operation and management of bulk storage facilities, aviation facilities and the operation and supply of retail and commercial outlets.
6. The reasons for the Oil Companies interests in these matters are as follows:
 - 6.1 The Oil Companies are not generally opposed to the Appellant's position regarding Objectives 13, 13A and 13B. In particular evidence was presented by the Oil Companies in relation to the avoid threshold in Objective 13 and the zero effects threshold for cumulative effects on human health. The Oil Companies seek to ensure that any amendments to the objectives provide appropriately for the use of hazardous substances and discharges from contaminated land.
7. The Oil Companies agree to participate in mediation or other alternative dispute resolution of the proceedings.

Dated at TAKAPUNA this 15th day of June 2018

Signature of person authorised to sign on behalf of The Oil Companies.



Mark Laurensen
Senior Planner

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Attention: Mark Laurensen

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A copy of this notice has been served on the following parties:

Alliance Group Limited
C/- Mitchell Daysh
PO Box 489, Dunedin
Attn: Adrian Low
Adrian.low@mitchelldaysh.co.nz

Southland Regional Council
C/- Wynn Williams and Co
PO Box 4341 or DX WX11179
Christchurch
Attn: Kirstie Wyss and Philip Maw
Kirstie.wyss@wynnwilliams.co.nz; Philip.maw@wynnwilliams.co.nz

