

**BEFORE THE ENVIRONMENT COURT**

**ENV-2018-CHC-000041**

**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** Heritage New Zealand

**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 Heritage New Zealand Pouhere Taonga (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 point 8.1 in relation to Objectives 9 and 13 and Policy 20.
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 interest in these matters are as follows:
  - 6.1 The Oil Companies are not generally opposed to the Appellant's position regarding recognition of historic heritage but are opposed to the extent of the relief sought. In seeking that Objectives 9 and 13 and Policy 20 be reinstated as notified the relief sought will potentially have significantly wider implications than in relation to historic heritage.
7. The Oil Companies agree to participate in mediation or other alternative dispute resolution of the proceedings.

Dated at TAKAPUNA this 15<sup>th</sup> day of June 2018

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



Mark Laurensen  
Senior Planner

**Address for service:**

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Attention: Mark Laurensen

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

Heritage New Zealand Pouhere Taonga  
64 Gloucester Street, Christchurch 8013  
PO Box 4403 Christchurch 8140  
mrussell@heritage.org.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

