

BEFORE THE ENVIRONMENT COURT

ENV-2018-CHC-000030

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 Wilkins Farming Co

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 Wilkins Farming Co (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 2 regarding Policy 42.
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 this matter are as follows:
 - 6.1 The Oil Companies are neutral with regard to preference for existing users of water but seek to ensure that the relief sought to Policy 42 does not inadvertently affect the framework for non-consumptive takes. As drafted, the relief sought by the appellant in the context of the wider rule is unclear and may inappropriately restrict the ability of the Oil Companies to dewater excavations for tank installations.
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

Address for service:

Burton Planning Consultants Limited
PO Box 33-817
Takapuna
AUCKLAND 0740

Attention: Mark Laurensen

Telephone: (09) 917-4302
Fax: (09) 917-4311
Email: mlaurensen@burtonconsultants.co.nz

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

Wilkins Farming Co
1018 Waipounamu Road, RD 6, Gore
sonofray@wilkinsfarming.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

