

BEFORE THE ENVIRONMENT COURT

ENV-2018-CHC-000031

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

Gore District Council
Southland District Council
Invercargill City Council

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 Gore District Council, Southland District Council and Invercargill City Council (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 9 and 10 regarding Rule 15;
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 consider that stormwater encompasses contaminants entrained in that stormwater but are not opposed to amendments to provide certainty for plan users in this regard. The Oil Companies consider that care is necessary to ensure that the rule is not inadvertently broadened to provide for discharges of stormwater, water and contaminants but rather that amendments provide for stormwater, including water and contaminants.
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:

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Attention: Mark Laurensen

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

The Territorial Authorities
C/- Anderson Lloyd
DX YX10107 or Private Bay 1959
Dunedin 9054
Attn: Michael Garbett and Rachel Brooking
michael.garbett@al.nz; rachel.brooking@al.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

