

BEFORE THE ENVIRONMENT COURT

ENV-2018-CHC-000047

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

Te Runanga O Ngai Tahu and others

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 Te Runanga o Ngai Tahu and others (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 regarding Objective 9B and appeal point 22 regarding Policy 26A;
 - Appeal point 10 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 interest in these matter are as follows:
 - 6.1 Bulk fuel storage facilities are critical infrastructure and the Oil Companies seek to ensure that amendments to Objective 9B and Policy 26A provide appropriately for the ongoing operation, maintenance and upgrading of these assets.
 - 6.2 The Oil Companies are not opposed to the principle of amendments to consolidate Objectives 13, 13A and 13B but are unclear as to the extent of relief sought by the appellant.
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:

Simpson Grierson – Wellington
PO Box 2402, DX SX 11174
Wellington 6140
Attn: James Winchester
James.winchester@simpsongrierson.com

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@wynwilliams.co.nz

