

**BEFORE THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

ENV-2019-WLG-000118

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an appeal pursuant to Clause 14(1) of
the First Schedule to the Act

BETWEEN CentrePort Limited
Appellant

AND Greater Wellington Regional Council
Respondent

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

To: The Environment Court Registrar
PO Box 5027
Wellington

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 following proceedings:
 - 1.1 ENV-2019-WLG-000118 between CentrePort Limited (“Appellant”) and Greater Wellington Regional Council (“Respondent”) in relation to the respondent’s decisions on submissions to the Proposed Wellington Regional Plan (“the Proposed Regional Plan”).
2. The Oil Companies lodged submissions on the Proposed Regional Plan on the subject matter of the proceedings.
3. The Oil Companies receive, store and distribute refined petroleum products. Within the Wellington Region, the Oil Companies own, operate and/or supply service stations, truck stops and various commercial activities, including Wellington International Airport. These facilities provide an essential service to the residents and businesses of Wellington Region.
4. The Oil Companies also own and operate bulk storage facilities and associated pipelines, located at Seaview and adjacent to Wellington Airport, from which petroleum products are distributed throughout the region and beyond. These facilities are recognised in the Proposed Regional Plan as regionally significant infrastructure and are critical to the functioning of the region as a whole.
5. The Oil Companies are not trade competitors for the purposes of section 308C or 308CA of the Resource Management Act 1991.
6. The Oil Companies are interested in the following matters raised by the Appellant:
 - 6.1 Policy 27: Natural Hazards (paragraphs 12-13)
 - 6.2 Policy 28: Natural Hazards (paragraphs 14-17)
 - 6.3 Policy 46: Sites with significant historic heritage value (paragraphs 20-22)
7. The reasons for the Oil Companies’ interest in these matters are as follows:
 - 7.1 The Oil Companies seek to ensure that the provisions of the Proposed Regional Plan continue to provide appropriate recognition and provision for the Oil Companies’ assets, in particular those comprising regionally significant

infrastructure; and do not unreasonably and/or unnecessarily restrict the Oil Companies' development and maintenance activities and oil industry standardised procedures. The Oil Companies also seek to ensure that the Appellant's appeal does not prevent the outcomes sought in the Oil Companies' own appeal from being achieved.

7.2 The Oil Companies are not opposed to the intent of the relief sought by the Appellant in regard to Policy P27. However, the Oil Companies do not support the specific wording proposed by the Appellant as the wording would suggest that residual risk should be further remedied or mitigated after hazard mitigation measures have been implemented. The concept of further managing residual risk is opposed as this is what remains after hazard mitigation measures have been implemented.

7.3 The Oil Companies have an interest in the relief sought in relation to Policy P28, and Policy P46. The Oil Companies support the intent to provide for regionally significant infrastructure and wish to be privy to any further amendments in this regard.

8. The Oil Companies agree to participate in mediation or other alternative dispute resolution of the proceedings.



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David le Marquand
Principal Planning and Policy Consultant
4Sight Consulting Limited

Dated this 9th day of October 2019

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and Kahlia Thomas

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

Greater Wellington Regional Council

Via email: RegionalPlanAppeals@gw.govt.nz

CentrePort Limited and CentrePort Properties Limited

C/- Bell Gully

171 Featherston Street

PO Box 1291

Wellington 6140

Attention: Laura Lincoln

Telephone: (04) 915 6800

Facsimile: (04) 915 6810

Email: andrew.beatson@bellgully.com / laura.lincoln@bellgully.com

Minister of Conservation

Via Email: kanton@doc.govt.nz