

**BEFORE THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

ENV-2024-WLG-000044

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 **Royal Forest and Bird Protection Society
of New Zealand Incorporated**
Appellant

AND **Wellington Regional Council**
Respondent

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

12 December 2024

**To: The Registrar
Environment Court
Wellington**

1. Z Energy Limited, BP Oil New Zealand Limited, and Mobil Oil New Zealand Limited (the **Fuel Companies**) wish to be a party to the following proceedings:

- 1.1 *Royal Forest and Bird Protection Society of New Zealand Incorporated v Wellington Regional Council* (ENV-2024-WLG-000044) being an appeal under clause 14 of Schedule 1 of the Resource Management Act 1991 (**RMA**), against the decisions of the Wellington Regional Council (**WRC**) on Proposed Change 1 to the Wellington Regional Policy Statement (**PC1**).

2. The Fuel Companies lodged submissions and further submissions on PC1 on the subject matter of the proceedings.

3. The Fuel Companies have an interest in the Appeal that is greater than the interest the general public has because:

- 3.1 The Fuel Companies receive, store and distribute refined petroleum products throughout the Wellington region. The Fuel Companies core business relates to the retail fuel outlets, including service stations and truck stops, and supply to commercial facilities.

- 3.2 There are a number of bulk fuel storage facilities (**terminals**) operated by the Fuel Companies in Wellington City and Lower Hutt, some of which are deemed to be Major Hazard Facilities. The terminals are infrastructure of regional and strategic importance and are critical to the functioning of the region as a whole.

4. The Fuel Companies are not trade competitors for the purposes of section 308C or 308CA of the RMA.

5. The Fuel Companies are interested in the parts of the Appeal that relate to the following:

- 5.1 Policy 29 relating to managing subdivision, use and development in areas at risk from natural hazards. The relief sought is opposed as it does not provide for regionally

significant infrastructure and other activities that are resilient to the effects of natural hazards.

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



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Miles Rowe
Principal Planning Consultant

Dated this 12th day of December 2024

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A copy of this notice has been served on the appellants and the parties in the list appended with this notice.