

**BEFORE THE ENVIRONMENT COURT  
WELLINGTON REGISTRY**

**ENV-2024-WLG-**

**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**

**Kāinga Ora – Homes and Communities**  
*Appellant*

**AND**

**Wellington City Council**  
*Respondent*

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

11 June 2024

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**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 *Kāinga Ora – Homes and Communities v Wellington City Council* (ENV-2024-WLG-) being an appeal under clause 14 of Schedule 1 of the Resource Management Act 1991 (**RMA**), against the decisions of the Wellington City Council (**WCC**) on the Wellington City Proposed District Plan (**PDP**).

2. The Fuel Companies lodged submissions on the PDP 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. Within Wellington City, 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 two bulk fuel storage facilities (**terminals**) operated by the Fuel Companies in Wellington City; one at Miramar and one at Kaiwharawhara, with the Miramar terminal being a Major Hazard Facility. The terminals are infrastructure of regional and strategic importance and are critical to the functioning of the city and 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 The definition of 'reverse sensitivity' within the Definitions Chapter of the PDP and opposes the relief sought by appellant as it will lead inconsistent application and interpretation of the PDP provisions.

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 11<sup>th</sup> day of June 2024

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

**Wellington City Council**

David Randal [david.randal@buddlefindlay.com](mailto:david.randal@buddlefindlay.com)  
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**Kāinga Ora – Homes and Communities**

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