

**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

Wellington International Airport Limited
Appellant

AND

Wellington City Council
Respondent

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

11 June 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 *Wellington International Airport Limited 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 did not lodge submissions on the PDP on the strategic objectives (Strategic City Assets and Infrastructure chapter) but made submissions on infrastructure provisions throughout the PDP, which overlap with 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 Strategic objectives SCA-O1, SCA-O4 and SCA-O6 and supports the relief sought by appellant as it will appropriately provide for regionally significant infrastructure in the city.

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 11th day of June 2024

Address for Service:

SLR Consulting Limited
Level 2, 214 Collingwood St
Hamilton Lake
HAMILTON 3204
Attention: Miles Rowe

Ph: +6427 276 2532

E-Mail: miles.rowe@slrconsulting.com

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

Wellington City Council

David Randal david.randal@buddlefindlay.com

Mark Mulholland mark.mulholland@buddlefindlay.com

Karyn Basher karyn.basher@wcc.govt.nz

Wellington International Airport Limited

Amanda Dewar amanda@amandadewar.com