

**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**

**Wellington Water Limited**

*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 *Wellington Water Limited v Wellington Regional Council* (ENV-2024-WLG-000049) 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 all aspects of the appeal that relate to the following:

- 5.1 The management of stormwater from existing, greenfields and brownfields development, including both hydraulic neutrality and hydrological control requirements;

- 5.2 Hydrological control requirements that may have implications on Proposed Plan Change 1 to the Regional Plan; and
- 5.3 Aspects of the management of stormwater runoff that conflict with the Regional Standard for Water Services.
6. The outcome of these appeal is uncertain as the scope of relief sought is unclear or the specific relief is not stated.
7. The Fuel Companies agree to participate in mediation or other alternative dispute resolution of the proceedings.



.....  
Miles Rowe  
Principal Planning Consultant

Dated this 12<sup>th</sup> day of December 2024

**Address for Service:**

SLR Consulting Limited  
Level 2, 214 Collingwood St  
Hamilton Lake  
HAMILTON 3204

Attention: Miles Rowe / Georgina McPherson

E-Mail: [miles.rowe@slrconsulting.com](mailto:miles.rowe@slrconsulting.com) / [georgina.mcpherson@slrconsulting.com](mailto:georgina.mcpherson@slrconsulting.com)

Ph: +6427 276 2532

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