

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

ENV-2018-CHC-237

**I MUA I TE KOOTI TAIAO
I ŌTAUTAHU ROHE**

IN THE MATTER of an appeal pursuant to clause 14 of the First Schedule of
the Resource Management Act 1991 (**RMA**)

AND

IN THE MATTER of the Proposed Second Generation Dunedin City District
Plan

BETWEEN **RAVENSDOWN LIMITED**

APPELLANT

AND **DUNEDIN CITY COUNCIL**

RESPONDENT

NOTICE OF LIQUIGAS LIMITED'S WISH TO BE PARTY TO PROCEEDINGS

31 JANUARY 2019

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NOTICE OF WISH TO BE PARTY TO PROCEEDINGS

TO: The Registrar
Environment Court
Christchurch

Proceeding and standing

1. Liquigas Limited (**Liquigas**) wishes to be a party to these proceedings.
2. Liquigas made a submission and further submission on the Proposed Second Generation Dunedin City District Plan (**Proposed Plan**).
3. Liquigas is not a trade competitor for the purposes of section 308C of the RMA.

Interest in proceeding

4. Liquigas is interested in all of the proceedings.

Liquigas opposes the appeal in part

5. Liquigas opposes the relief sought by the Appellant in relation to Policy 2.2.6.2 for the following reasons:
 - (a) it is inconsistent with the relevant objectives and policies of the Proposed Plan;
 - (b) it does not adequately avoid, remedy or mitigate the adverse effects on the environment;
 - (c) it is inconsistent with the sustainable management of natural and physical resources and is inconsistent with the purpose and principles of the RMA;
 - (d) it will not meet the reasonably foreseeable needs of future generations;
 - (e) it does not enable people and communities to provide for their social, economic and cultural well-being;
 - (f) it is inconsistent with sound resource management practice; and

(g) for the reasons given in Liquigas' appeal, unless it is modified to address those matters.

6. In addition to the general reasons above, Liquigas considers that Policy 2.2.6.2 should be retained because it seeks to restrict sensitive activities from locating within a hazard facility mapped area, which applies to Liquigas' LPG storage terminal and distribution facility at 254 Fryatt Street, Dunedin.

Liquigas supports the appeal in part

7. Provided the relief sought by the Appellant is adequately modified to address the matters raised in Liquigas' appeal, then Liquigas conditionally supports the remaining relief sought by the Appellant for the following reasons:
- (a) it is consistent with the relevant objectives and policies of the Proposed Plan;
 - (b) it adequately avoids, remedies and mitigates the adverse effects on the environment.
 - (c) it is consistent with the sustainable management of natural and physical resources and is otherwise consistent with the purpose and principles of the RMA;
 - (d) it will meet the reasonably foreseeable needs of future generations;
 - (e) it will enable people and communities to provide for their social, economic and cultural well-being; and
 - (f) it is consistent with sound resource management practice.

Mediation/alternative dispute resolution

8. Liquigas agrees to participate in mediation or other alternative dispute resolution of the proceedings.

DATED this 31st day of January 2019

Liquigas Limited by its solicitors
and duly authorised agents
MinterEllisonRuddWatts



R M Devine

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