

BEFORE A HEARINGS PANEL APPOINTED BY THE HUTT CITY COUNCIL

IN THE MATTER OF the Resource Management Act 1991 (“the Act” or “the RMA”)

AND

IN THE MATTER OF the Hazardous Substances submissions of the Fuel Companies (bp Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited) on the Proposed Hutt City District Plan (“the PDP”)

STATEMENT OF EVIDENCE OF JENNIFER POLICH

REBUTTAL

FOR

**BP OIL NEW ZEALAND LIMITED, MOBIL OIL NEW ZEALAND LIMITED AND Z
ENERGY LIMITED (“THE FUEL COMPANIES”)**

9 May 2026

1. INTRODUCTION

- 1.1 My name is Jennifer (Jenny) Polich. I am a Principal Engineer at Sherpa Consulting Pty Ltd (Sherpa) based in Sydney, Australia.
- 1.2 I have been retained by the Fuel Companies (via SLR Consulting) to provide expert evidence in relation to risk issues and land use safety planning matters, specifically use of risk management overlays in the hazardous substances provisions of the proposed Hutt City District Plan (PDP).
- 1.3 I provided evidence in relation to this matter 8 May 2026.

2. SCOPE OF REBUTTAL EVIDENCE

- 2.1 The scope of my rebuttal evidence covers response to the evidence of STATEMENT OF EVIDENCE OF ROBERT ALAN VAN DE MUNCKHOF TONKIN & TAYLOR LTD 8 May 2026 for Seaview Marina which were not addressed in my initial evidence:
 - (a) Commentary on populations already accounted for in existing societal risk modelling of Seaview Marina area
 - (b) Commentary of the suitability of markets as a land use in the Seaview Marina area

3. REBUTTAL COMMENTS

- 3.1 Paragraphs 51d) and 52 of the Tonkin and Taylor evidence are reproduced below, and states that the existing QRA has already considered a change in land use:
 - d The population density used within the QRA assumes that the Seaview Marina site is a special recreational zone, with potential rezoning to mixed use, with a population density the same as suburban commercial and much higher than low density residential. I note that the references are to land use types generally and not to the specific zones within the PLHDP.
 - 52 In terms of the earlier discussion on the consideration of societal risk, it is clear that the existing QRA has already considered a change in land use to commercial/mixed use, which in my opinion supports this not being a key factor in setting the PLHDP provisions.

3.2 As per the QRA report an overall population density (36 people / hectare) is applied to the whole Seaview Marina area highlighted in green below for the current case based on low density residential . The area is around 68,000m², which corresponds to 246 people in the whole area. A future case has been considered with 40 / hectare over the whole area which is 272 people in total. There is no allowance for night time population in base case, with a 20% allowance in future case (~54 people over the whole area). This may not adequately account for population intensification (regardless of sensitivity) specifically in the areas to the south of the Mobil terminal within the risk footprint (contours reproduced in Appendix A) which would have the most effect on societal risk as per image below. Population / development in the western area would have minimal effect on societal risk.



3.3 Paragraphs 43 and 44 of the Tonkin and Taylor evidence are reproduced below, and suggest that timing of ship imports can be used to reduce risk during temporary population increases. In my view, small scale markets (i.e. tens of people only) are within the type of land use already considered. Large scale markets with many stalls would introduce populations that are outside the scope of the risk assessment as per point above. If these are considered they should be limited to the western areas outside the risk contours

3.4 In my experience with similar terminals it is not practical (from a logistics or cost perspective) to schedule ships to avoid coincidence with frequent events which temporarily but significantly increase populations (eg weekly or monthly markets,

sporting events etc). Ships will typically have a 3 day arrival window and unloading will typically occur over a 16 – 36 hour period so to try to avoid a ship every Sunday for example is not operationally practical. It is possible to plan this for an event with a significant planning window (eg an annual marathon, large annual regatta, annual music festival).

43 I also consider that the provisions may unnecessarily restrict occasional or irregular activities. This could include sporting events (such as a sailing contest), **one-off or monthly markets**, or annual community events.

44 As the key risk relates to the overfilling of bulk tanks, a key method to manage risk during these types of events would be to ensure they occur when fuel delivery activities are not occurring.



Jenny Polich

Principal Engineer Sherpa Consulting Pty Ltd

18 May 2026

