

**In the Environment Court
Wellington Registry
I Mua I Te Kōti Taiao O Aotearoa
Te Whanganui-ā-Tara Rohe**

ENV-2019-WLG-000116

Under the Resource Management Act 1991
And in the matter of an application under Section 274 of the Act

Between

Porirua City Council

Appellant

and

Greater Wellington Regional Council

Respondent

**Notice of Tītahi Bay Residents Association Incorporated's
wish to be party to proceedings**

9 October 2019

BELL GULLY

BARRISTERS AND SOLICITORS

A J L BEATSON L M LINCOLN

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To: The Registrar
Environment Court
Wellington

1. Titahi Bay Residents Association Incorporated (**TBRA**) wishes to be a party to an appeal by Porirua City Council (**PCC**) (*ENV-2019-WLG-000116*) in respect of decisions of the Greater Wellington Regional Council (**GWRC**) on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**).
2. TBRA made a submission about the subject matter of the proceedings.
3. TBRA is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991.
4. TBRA is interested in part of the proceedings relating to amending Map 35 to accurately follow the mean high water springs (**MHWS**) line.
5. TBRA is interested in the following particular issue:
 - (a) That Map 35 is misleading as it shows the extent of MHWS to be over the MHWS line.
6. TBRA opposes the relief sought because:
 - (a) Amending Map 35 to show the line of MHWS beyond an indicative line is not appropriate given MHWS is subject to change;
 - (b) The approach under the Operative Wellington Regional Coastal Plan should be reinstated whereby MHWS is shown only as an indicative line on Map 35, and a definition for MHWS is included in the Interpretation section of the PNRP as follows:
 - (i) Mean high water springs means the average of each pair of successive high waters during that period of about 24 hours in each semi-lunation (approximately every 14 days), when the range of tides is the greatest.

7. TBRA agrees to participate in mediation or other alternative dispute resolution of the proceedings.



A J L Beatson / L M Lincoln
Counsel for Titahi Bay Residents Association Incorporated

Dated 9 October 2019

Address for service:

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Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.