

# Survey Responses

28 March 2019 - 28 February 2022

## Trading and event sites on Wellington Town Belt and reserves

### Kōrero mai | Wellington City Council

Project: Trading and event sites on Wellington Town Belt and reserves



VISITORS					
125					
CONTRIBUTORS			RESPONSES		
35			43		
35	0	0	43	0	0
Registered	Unverified	Anonymous	Registered	Unverified	Anonymous

No.	First name	Surname	Organisation
1	Kristian	Bubendorfer	
2	Fred	Albert	
3	Jo	Lester	Wellington International Airport Limited
4	Steven	Mahon	
5	Raewyn	Hailes	CCS Disability Action
6	Cameron	Battley	
7	Drew	Kohing	
8	Lisa	Kelly	
9	Phillip	Wong	
10	Clare	Bennett	Mr Whippy Wellington
11	Paul	Van Houutte	
12	Thomas	Cappleman	WORD
13	Robert	Murray	
14	Viv	Chapple	
15	Midori	Willoughby	Wooden Spoon Freezery
16	Beverley	Abbott	Otari Wilton's Bush Trust
17	Catherine	Skinner	
18	Derek	Neale	Karori Residents Association
19	Wellington's	Character	Wellington's Character Charitable Trust
20	Lorraine	Griffin	
21	Luke	Forsdyke	The Hound Way
22	Isobella	Baarspul	The Happy Dog NZ
23	Bryn	Dickerson	
24	Penny	Krieg	Loose Leash Dog Walking Newlands Johnsonville Wellington
25	Phil	Krieg	Loose Leash Dog Walking Newlands Johnsonville Wellington
26	Cathi	Napp	

27	Dominic	FitzPatrick	
28	Angela	Rothwell	
29	Russel	Garlick	Joyride Mountain Bike Skills
30	Ashley	Peters	WORD (World Off-road Riding Department)
31	Cathi	Napp	Central Allbreeds Dog Training School
32	Jan	Voss	A.C.E. Dog Training Ltd
33	Daniel	Spector	
34	Angela	Rothwell	Mount Vic Residents Assoc
35	Ellen	Blake	Living Streets Aotearoa
36	Rebecca	Royal	
37	Gaye	Bergquist	
38	Gaye	Brandeth-Wills	
39	Robin	Buxton	Friends of the Wellington Town Belt
40	Helene	Ritchie	



[Redacted]  
[Redacted]  
[Redacted]

Q1. Are you making this submission as an individual or on behalf of an organisation?	Individual
Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:	not answered
Q3. I would like to make an oral submission to Councillors:	No
Q4. If yes, please give your phone number so that a submission time can be arranged:	not answered
Q5. Do you have a file you would like to upload to support your submission? Upload it here.	[Redacted] [Redacted] [Redacted] [Redacted]
Q6. How much do you agree or disagree with the proposed sites?	Strongly agree
Q7. How much do you agree or disagree with the proposed activities?	Strongly agree
Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?	Strongly agree
Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	<p>I have attached a document, as there is not enough space in this box. In summary, I would like clarification to be made on scale and duration. Please see submitted document.</p>

I have read both the draft plan and the additional supporting material, and there are some parts that are unclear in your documentation. It seems that for low impact mobile activities such as mountain bike coaching, permission is required from a council officer. I have questions around this - as activities such as this, are activities that you acknowledge are fundamentally in local character and ultimately a public good.

I would like to clarify that I am not a coach or guide - rather I am someone who has used coaching services from Joyride, Fluid lines, and Wellington MTB adventures, and my children have attended term classes with Word. I would like to limit any restrictions or additional costs they would incur.

I specifically want to address scale and duration - I worry about the impact of additional compliance and paperwork on small or sole traders who might be coaching individuals or small numbers (less than 5 for example).


Firstly I would like to address scale. For a low impact mobile activity, it seems permission needs to be obtained without consideration of scale. Permission appears to be required regardless of if you are coaching 1 person or a large outdoor fitness class - from my personal experience the former is very much a different impact on the general public than the latter. This seems unfair for the smaller scale activities, and I would like to suggest a threshold model be adopted - otherwise compliance costs will fall unfairly on the small groups - as any costs are amortised over fewer people. I suggest that individual coaching or small group coaching with 5 or fewer in attendance be made entirely exempt, or at least without fee.

Secondly, must permission be obtained each individual session, or can a blanket approval be given, say, annually? I worry about the impact of additional compliance and paperwork on small or sole traders - especially those who operate at an ad-hoc or on demand level rather than a regularly scheduled activity.

I would like to see additional clarity on these points in the documentations.

Kris Bubendorfer





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Individual

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not answered

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

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not answered

Q6. How much do you agree or disagree with the proposed sites?

Strongly disagree

Q7. How much do you agree or disagree with the proposed activities?

Strongly disagree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly disagree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

You should particularly leave any of the town belt out of these proposals. There should be no commercial activities on this land. I have less issue with sites such as the Fryberg Pool carpark but really, why can't the city just leave some areas alone for people to walk in (or have options for those with accessibility issues). These places will become even more important as the city grows in population and density.



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Q1. Are you making this submission as an individual or on behalf of an organisation?	Organisation
Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:	Wellington International Airport Limited
Q3. I would like to make an oral submission to Councillors:	No
Q4. If yes, please give your phone number so that a submission time can be arranged:	not answered
Q5. Do you have a file you would like to upload to support your submission? Upload it here.	[Redacted] [Redacted] [Redacted] [Redacted] [Redacted]
Q6. How much do you agree or disagree with the proposed sites?	not answered
Q7. How much do you agree or disagree with the proposed activities?	not answered
Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?	not answered
Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	not answered



6 December 2021

Trading and Event Sites – Wellington Town Belt and Reserves  
Wellington City Council  
Sent via email: policy.submission@wcc.govt.nz

**SUBMISSION ON WELLINGTON CITY COUNCIL TRADING AND EVENT SITES – WELLINGTON TOWN BELT AND RESERVES**

Name of Submitter	Wellington International Airport Limited
Contact:	Jo Lester [REDACTED]

Wellington International Airport Limited (the Airport) is the owner and operator of Wellington International Airport - a key link in New Zealand's domestic and international aviation network.

Wellington Airport supports Wellington City Council in changing its policies to enable, support and promote opportunities to trade and hold events in our city's public places in the City.

However, first and foremost, the Airport's key role is to ensure that aircraft can operate safely.

The Airport is not opposed to the use of sites within the vicinity of the airport for trading and event activities, however some activities on some of these sites could impact the safe operation of aircraft landing and taking off from the airport, such as

- Use of lighting/lasers etc or anything shiny or glary that could affect a pilot's ability to safely control a plane or helicopter
- Use of fireworks (although we note that these are prohibited under other bylaws).

Thank you for taking this into consideration for Site No. 2 (Lyall Bay Beach and Carpark), however I note that the same restriction would need to apply to Site No. 3 (Evans Bay Marina, Hataitai), Site No. 4 (Worser Bay beach and carpark), Site No. 5 (Cog Park) and Site No. 6 (Kilbirnie Park).

Wellington Airport seeks that as a part of the approval process for any events/activities that include any lighting that the applicants first obtain written approval from Wellington Airport.

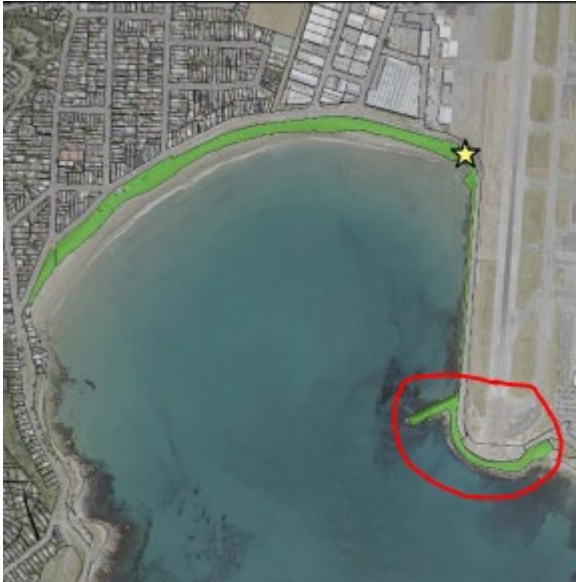
In relation to the site closest to the Airport - Site No. 2 (Lyall Bay Beach and Carpark), we would also like to make the following comments:

- The Airport are not opposed to food activities her per se, however any waste needs to be carefully managed/removed from site, so as to not attract birds.





- Even though this site is titled “Lyall Bay Beach and Carpark”. the map of this area extends along the seawalls and breakwater:



Wellington Airport seeks that the area circled in red above be removed from this map to avoid any confusion - this area should not be accessible for the general public for safety reasons.

Wellington Airport also seeks that as a part of the approval process for any events/activities at Site No. 2, that applicants first obtain written approval from Wellington Airport.

We do not wish to make oral submissions to the Councillors.

Kind regards,

Jo Lester  
Airport Planner  
Wellington International Airport Limited



[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Strongly agree

Q7. How much do you agree or disagree with the proposed activities?

Strongly agree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly agree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered



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[Redacted] [Redacted]

- Q1. Are you making this submission as an individual or on behalf of an organisation? Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name: CCS Disability Action
- Q3. I would like to make an oral submission to Councillors: Yes
- Q4. If yes, please give your phone number so that a submission time can be arranged: [Redacted]
- Q5. Do you have a file you would like to upload to support your submission? Upload it here. not answered
- Q6. How much do you agree or disagree with the proposed sites? Agree
- Q7. How much do you agree or disagree with the proposed activities? Agree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)? Agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

We would like to thank Council for the strong inclusion of access features in this Policy. It has been a long process of consultation and we look forward to seeing the changes improve accessibility for all in the City. We support the smoke and vape free component of all approvals. Recommendation. That the definition of public places in section 11 is moved to a more predominant place, and suggest in section 1 Introduction. It is not immediately obvious what is included in the scope of the policy with the naming of specific places and reserves in the forefront of the document. Recommendation. That the definition of Micro-mobility devices is reworded to ensure that disabled people are not adversely impacted by the definition. The rapid development of micro-mobility devices is continually producing new aids for people with impairments that open up many more opportunities for disabled people as pedestrians. Recommend that the review of Council's Signage in Public Places Policy be progressed as quickly as possible, to provide clarity and reduce the number of barriers throughout the city. Recommend. That Council Officers be resourced to ensure timely appropriate response to offenses and complaints.. Monitoring and enforcement of the policy is a key to the success of providing a vibrant, diverse, safe and accessible city for all people to enjoy.



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[Redacted] [Redacted]

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Q3. I would like to make an oral submission to Councillors:	Yes
Q4. If yes, please give your phone number so that a submission time can be arranged:	[Redacted]
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Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	not answered

Hello Councillors!

I hope this finds you well and that you had a relaxing xmas and new years. You may remember me from the consultation process for Dog Walkers on the subject of the "trading and events in public places" proposal.

Written submission:

[https://drive.google.com/file/d/1CI\\_hQSekGSFysx\\_DFyXDz7\\_y64hh32oE/view?usp=sharing](https://drive.google.com/file/d/1CI_hQSekGSFysx_DFyXDz7_y64hh32oE/view?usp=sharing)

Oral submission:

<https://drive.google.com/file/d/1BklIHvcjZmAr5evFycgKg1XwrCvifLEL/view?usp=sharing>

I'm writing to you today regarding the amendments to the Proposal made after the consultation, written and oral submissions to council.

<https://www.letstalk.wellington.govt.nz/70027/widgets/343633/documents/221086>

#### "4. Commercial/professional dog walking, handling, and trainers

Professional dog walkers, handlers, and trainers (Note, in this policy professional dog trainers only refers to those trainers operating in public places, and does not include those operating in licensed areas for dog training purposes) require approval under this policy to operate in public places. The rules for professional dog walkers and trainers operating in public places include minimising the:

- a. negative impact or conflict with other public space users
- b damage to public spaces amenity and assets.

Under this policy, professional dog walkers, handlers, and trainers must complete the Council's annual registration course before they can obtain approval to operate in public places. The course sets out the rules and conditions for operating in our public places. All professional dog walkers, handlers, and trainers must comply with the Dog Control Act 1996 and the Council's Dog Policy 2016 which set out that dogs must be kept under control at all times."

Let me start off by saying I fully support the amendments made. I feel this is a huge step towards legitimising safe and proactive handling of dogs in a city.

By proactive communication via a registered course and handler licensing, creating more informed professional handlers, resulting in better trained dogs, flowing on to well behaved dogs with owners in public. This process cant help but result in fewer call outs for animal services and an improved public image of dogs in public spaces. Opening up for use, areas for the professional handling of dogs, in conjunction with the course and licensing reduces congestion and promotes safety in areas frequently used by professional dog handlers. Which in turn reduces impact to the public, the spaces themselves as well as supporting infrastructure and amenities.

This would seem to be the intent of the subject at hand.

I would heartily endorse further lines of communication between WCC Animal Services, WCC Parks, WCC legislation and representatives of Wellington's Professional Dog Handlers (walkers, trainers, daycare) on what shape the licensing and course modules should represent. It is important to note that in order for the course and licensing structure to be adopted positively by the professional dog handlers, they must feel they have some say in the direction this course takes, that there are clear advantages for them to take part in and register for the licensing process.

I submit that by allowing Professional Dog Handlers to take part in the creation of the course, or at the very least, an opportunity to comment on the draft. Will put forward a sense of "ownership" of the proposed licensing, course and any changes they entail within the framework set out by council departments, while promoting a sense of "transparency" over the process. Like the creation of a tool, it is important that the intent of the legislation is forged by WCC legislation, shaped by WCC Animal Control and Parks, and tempered with input from Professional Dog Handlers.

In addition on the subject specifically of professional dog walking, I admit to being in favour of a staggered incremental annual increase of the number of dogs in a handlers pack. There is no way that someone with no experience in walking dogs should be walking more than 6 client dogs in their first year, 8 in the second and 10 in the third. A first year walker can comfortably manage 6 client dogs, whereas someone who has been walking for 10 years may be comfortable with over 15 client dogs. Its an obvious "carrot and stick" lever for controlling structured pack walks on council property by incentivising good practice while

weeding out poor practitioners. It gives council more control over the industry at large and promotes positive two way discourse at the annual licensing, keeping all parties up to date with what is working and what is not in an effort to proactively manage potential future issues. I have been personally lucky enough to have been mentored by some of Wellington's industry legends who guided me over the pitfall of overconfidence in this matter. I have seen people walking who did not have this guidance. The difference in pack control is profound

You'll notice I said client dogs, many of us use our own dogs as "surrogate handlers" or translators if you will. Dogs are notorious for their collective peer pressure. A handler's dog will perform the required tasks immediately giving client dogs an example to follow when learning or demonstrating a desired behaviour. Such as remaining calm around traffic, ignoring skateboards and bikes, or remaining seated and calm at a cafe. For this reason I believe that a handler's dog/s should be exempt from the licence number restriction, if adopted, and instead be attached to the handlers licence as handler animals. In many ways my own dogs make handling my pack easier. When leashed in areas such as the city or on trail they stay on the front outside opposing sides of the pack, essentially taking guard positions, keeping the pack in formation at heel behind me through example and body pressure. When off leash they guide the pack in play, including regular check-ins with myself demonstrating appropriate behaviour.

On to the licences themselves. Every handler I have spoken to does not have a problem with carrying a licence visibly or on their vehicles, especially if it helps WCC Parks know who is in a given area at a given time.

However, there is a darker, more sinister issue that is repeatedly referred to. Many, if not all, of the female Professional Dog Walkers I have spoken to, unlike their male counterparts, have been accosted at some time by unwanted male attention while walking their charges. Often verbal abuse is directed at them, they have been followed, spat on and there is at times real fear of physical harm. I, like many of my male counterparts, are enraged by this treatment of our peers. There are incidents where these young women are approached in locations where the cell phone coverage is spotty, in rough terrain, with very few people around. They are in these locations like many of us, as the current restrictions on dog handling in public places has pushed suitable areas to more and more remote locations. Infuriatingly, these incidents also have been known to happen on the city's waterfront in full view of the public with no intervention from bystanders , which in some ways is even more


horrific. It speaks to much deeper seated and troubling social issues with our city than this submission will enter into. Because of this, many small operator professional Dog walkers travel in vans unmarked by company information in order to avoid identifying attention. As disturbing as this is, I mention it for context. Any displayed licence we are issued MUST NOT contain anything that can be used to track a walker to their place of residence, such as individual name, company name or place of business (as this is often their place of residence). A simple number that WCC Animal Control can access for non-public dissemination of information pertaining to that walker is infinitely more desirable.

Thankyou for your time once again

Cameron







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Individual

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Strongly agree

Q7. How much do you agree or disagree with the proposed activities?


Strongly agree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly agree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered



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Individual

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not answered

Q3. I would like to make an oral submission to Councillors:

Yes

Q4. If yes, please give your phone number so that a submission time can be arranged:

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Disagree

Q7. How much do you agree or disagree with the proposed activities?

Strongly disagree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Neutral

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

I feel the areas that already have a strong community shopping area should not lose business in their area, places like cemeteries to me personally are not appropriate and quite disrespectful. It is a very careful balance of the area, the community, and the type of business wanting to set up. I am currently trading at Te Kopohau Reserve, Red Rocks, Owhiro Bay. It is quite ironic I write this today as it is 1 year since I personally delt with a suicide in this area along side one of the local neighbours. It is about the area, the neighbours and what you end up providing for that area. In my time at Te Kopohau Reserve, I have not only gotten to know the community, the batch owners and more, but it has come with providing support, from everything to calling ambulance, police, lost children, knowledge of the area, blocked toilets, you name it I have done it!! I have become a watchdog for the area as well as a beckon to come to when things go wrong. I am also VERY aware of this amazing reserve and did not feel that serving more than what I do was appropriate. This is something that has to be taken into consideration when making the decision as to where and what type of trading can go into the specific area! It is a very special and delicate balance. Happy to talk to you more about this. Kind Regards Lisa Kelly



[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

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Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	<p>Fabulous for Wellington with the policy changes. It would be great for a sole trader business like mine to survive after 2 year of uncertainties for allowing me to trade occasionally on public spaces and reserves outside the CBD. See my write up on the document attached. Lynn Wong, Owner and Operator of "The Hungry Monkey Wellington food truck [REDACTED]"</p>

### Trading and Events in Public Places Policy

I've owned and operated my food truck call "The Hungry Monkey Wellington" for close to 7 years now. My food truck was voted by Wellington public the second-best food truck for Wellington Region in 2018.



Over that time, I attended mostly public events organized by private promoters or by various city councils event teams. I also attend the weekly Harbourside Market. I traded at Frank Kitts Park and on the Council managed Wharf spaces. There are occasions where I've done well and other times it would be better to stay home. Nonetheless it is always rewarding serving my delicious and well-priced meals to Wellingtonians and visitors to our great city.

The past 2 years have been challenging with various lockdowns, the lack of visitors to our great city and numerous event cancellations. When I heard the City council was reviewing the use of public spaces and reserves for events, activities and commercial trading opportunities, I felt it is right I like to share some thoughts and experiences encountered over that time.

Updating the policy in my view help to increase the cultural values, diversity and vibrant of our unique city. We are often referred to the coolest capital city in the world. Our city is not large by any means. However, it is compact, vibrant, contains huge diversity, culture, great cafes, restaurants, best craft beer and cool people.

Fee charged by the Council is very reasonable for using the space at Frank Kitts Park and the Wharf area. Privately promoted events fees can be exorbitant. Food truck cannot trade 7 days a week due to capacity constraints and it can be very taxing having to pay excess fees at times. Wellington Council by letting some commercial activities around public spaces and reserves outside the CBD would be a great opportunity for small business like mine. Some of the places mentioned in the updated policy documents are exactly the locations where I would like to be able to trade.

Living in the Kilbirnie often I go for long walk. I see beaches like Seatoun, Island Bay and Lyall Bay are usually full of people on a fine day. As the saying goes you can't beat Wellington on a good. This summer it has been particularly warm and sunny. Over the holiday periods it was full of people. I wonder at times it would be good to have a food truck or ice cream cart providing some food and refreshment. I can see some businesses at those locations impacted but not significant. I don't want or expected to trade there every day. I am only looking to trade a fine day and once or twice a week. This will mainly be over the summer months. This opportunity to trade would be great. Since the Country has gone into the RED setting, I have written off all the summer events due to cancellation and not even sure when the new normal will return. At least I can try to go out there and generate some income and serve our delicious food the public.

I know the policy change does not come into effect until 01 July 2022. I won't be out there chasing it over these winter months. It would be to make it easier to apply and be granted permission to do so in future. I wrote to the Street Activities team at WCC in the past week to see if there are opportunities to at least get at least some trading days and spots in the next couple of months. There is no guarantee tis will happen in the near date.

Sample of places suggested in my email

Location 1 is the car park at Dorrie Leslie Park Lyall Bay

Location 2 is Island Bay Surf Club, space next to the disable car park (possible private property, I emailed the club as well)

Location 3 is space next to the car park at Worser Bay Surf Club public space or surf club land?

Thank you.

Regards

\*\*\*


#### 3 Attachments



Author:

Lynn Wong, Owner and Operator of The Hungry Monkey Wellington

[Redacted signature block]



Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

Mr Whippy Wellington

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

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Strongly agree

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Strongly agree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

We have in previous years been locked out of trading due to lengthy licenses in place, so it would be good to know what the time frames are, if certain areas are awarded licenses were to be approved. I.e. Railway station, Fryeburg Pool. Would areas such as Worser Bay just be temporary sites. I.e. Mr Whippy would stop by on a hot summers day, but not necessarily be there in the Winter. Thank you for the opportunity to partake in the survey and to be able to convey our thoughts on the trading process. Kind regards



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Individual

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Strongly disagree

Q7. How much do you agree or disagree with the proposed activities?

Strongly disagree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly disagree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

The Wellington Town Belt is unsuitable for any commercial activity, as it undermines its purpose as a nature reserve area. It should not be exploited for profit in any form, and this is disrespectful to the natural and cultural significance of the area, particularly Matairangi maunga/Mount Victoria, foreshore areas, the Botanical gardens, Centennial reserve and Truby King park. The council should prioritise the preservation and indigenous restoration of nature in these areas as part of fostering a love and respect for the natural world through local regeneration.



[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

WORD

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Agree

Q7. How much do you agree or disagree with the proposed activities?

Agree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly agree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

Great changes, awesome! It is fantastic that we are able to deal with officers/rangers in the approval process, these people understand the areas, community and recreation and will see the value we add as outdoor operators. Thanks heaps!





[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

Q1. Are you making this submission as an individual or on behalf of an organisation?	Individual
Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:	not answered
Q3. I would like to make an oral submission to Councillors:	No
Q4. If yes, please give your phone number so that a submission time can be arranged:	not answered
Q5. Do you have a file you would like to upload to support your submission? Upload it here.	not answered
Q6. How much do you agree or disagree with the proposed sites?	Strongly disagree
Q7. How much do you agree or disagree with the proposed activities?	Strongly disagree
Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?	Strongly disagree
Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	

To have an event on public land, especially the Town Belt, requires exclusion (or constraint) of the public, which is contrary to the intent of the Town Belt. You cannot, and must not do this. I will not comply with any constraints on my use of the Town Belt. I might excuse totally not profit uses.



[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

Q1. Are you making this submission as an individual or on behalf of an organisation?	Individual
<hr/>	
Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:	not answered
<hr/>	
Q3. I would like to make an oral submission to Councillors:	No
<hr/>	
Q4. If yes, please give your phone number so that a submission time can be arranged:	not answered
<hr/>	
Q5. Do you have a file you would like to upload to support your submission? Upload it here.	not answered
<hr/>	
Q6. How much do you agree or disagree with the proposed sites?	Strongly disagree
<hr/>	
Q7. How much do you agree or disagree with the proposed activities?	Strongly disagree
<hr/>	
Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?	Neutral
<hr/>	
Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	
<p>I have deep reservations about this commercialisation of public areas. I accept that Council Officers are specialists in their fields but they do not run commercial businesses. I worry that a plethora of coffee carts will impact on bricks and mortar businesses cumulatively across the city. Further I foresee the opportunity for corruption a la the bakers of New York. Also as each space use stands on its own merits the combined effect across the city can be ignored. But as this is already a done deal I can only comment on specifics. At the Karori Cemetery I find the idea of a coffee cart mixing with the dead repugnant. Even if the cart is nearby there is an implied invitation to share food and beverages with dead strangers. I am surprised tangata whenua are ok with this but I suppose it's not their urupa. In the matter of Alex Moore Park it seems to me that club fundraising opportunities will be lost if in competition with commercial food and beverage providers. I would really like to see some robust research done in say 3 years to review the impact of this policy. It seems that the underpinning value is how to maximise usage of the reserves et al rather than protecting them from every generations exploitation.</p>	
<hr/>	



[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

Wooden Spoon Freezery

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Disagree

Q7. How much do you agree or disagree with the proposed activities?

Neutral

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Neutral

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

Would love to see more seasonal options (sites, monthly rates) available for mobile cart vendors who would like to set up for a period of 3 months. The Eastern ward plan, along Lyall Bay through Island Bay does not allow for mobile cart activity. In the summers these areas would be well served by coffee / ice cream / snacks.




[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

- Q1. Are you making this submission as an individual or on behalf of an organisation? Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name: Otari Wilton's Bush Trust
- Q3. I would like to make an oral submission to Councillors: Yes
- Q4. If yes, please give your phone number so that a submission time can be arranged: [REDACTED]
- Q5. Do you have a file you would like to upload to support your submission? Upload it here. not answered
- Q6. How much do you agree or disagree with the proposed sites? not answered
- Q7. How much do you agree or disagree with the proposed activities? not answered
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)? not answered
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

The Ōtari-Wilton's Bush Trust was established as an independent charitable trust in 2001. The Trust agrees that Ōtari-Wilton's Bush should be on the list of proposed sites. The following comments relate only to Otari-Wilton's Bush, no other sites. The Trust strongly agrees with a mobile coffee cart at Ōtari that may also sell small home-baked items from local providers, e.g., muffins. The Trust agrees with a limited number of commercial tour operators providing guided tours at Ōtari provided that the first right to conduct such tours remains with the Trust in recognition of its contributions to Ōtari over many years of funding and voluntary labour. The Trust would also support some tracks being closed to commercial operators so that locals continue to have free, uncongested access to popular tracks. The Trust disagrees with the hire of recreation equipment at Otari other than walking poles, umbrellas and magnifying glasses/binoculars. The Trust disagrees with • recreation services provision • commercial group fitness • one-off events organised by providers other than WCC. The Trust strongly disagrees with commercial dog walking. The Trust strongly supports the ban on mountain bikes in the WBG Management Plan and related activities such as scooters and commuter cycling.



Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Disagree

Q7. How much do you agree or disagree with the proposed activities?


Strongly disagree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly disagree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

Local ecosystems need to be taken into account when looking at putting in mobile businesses i.e. would this take business off an existing supplier that may be struggling. I also note that consideration is being given to putting commercial activity near a cemetery - appallingly insensitive idea. The council needs to be careful/very mindful of the balance of an area, the community, and the type of business wanting to set up. Recommend there should be a consultation process prior to a business being granted any permissions. With specific regard to trading at Te Kopohau Reserve, Red Rocks, Owhiro Bay, this area is a marine reserve and recovering nature area (subsequent to the closing of the quarry). It is a difficult area from a weather/exposure perspective. It is widely used by many types of people. Placement of any type of commercial activity must be done in a manner that insures respect of the area and community. The current caravan business has been an exceptional addition to the community in many ways eg. providing first aid when required, information to authorities, calling ambulances as appropriate and looking out for the local people. Putting just any old supplier here could turn this delicate balance upside down. The operator, Lisa, lives in the area and cares about it. I would like to request that the wording is changed, for this area, to say applications for a mobile business will be done in consultation with the community (i.e. Owhiro Bay Residents Assoc) and the Park Ranger, at a minimum. Thanks, regards, Catherine



Q1. Are you making this submission as an individual or on behalf of an organisation?	Organisation
Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:	Karori Residents Association
Q3. I would like to make an oral submission to Councillors:	No
Q4. If yes, please give your phone number so that a submission time can be arranged:	not answered
Q5. Do you have a file you would like to upload to support your submission? Upload it here.	not answered
Q6. How much do you agree or disagree with the proposed sites?	Agree
Q7. How much do you agree or disagree with the proposed activities?	Agree
Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?	Agree
Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	No further comments



Q1. Are you making this submission as an individual or on behalf of an organisation?	Organisation
Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:	Wellington's Character Charitable Trust
Q3. I would like to make an oral submission to Councillors:	No
Q4. If yes, please give your phone number so that a submission time can be arranged:	not answered
Q5. Do you have a file you would like to upload to support your submission? Upload it here.	not answered
Q6. How much do you agree or disagree with the proposed sites?	Strongly disagree
Q7. How much do you agree or disagree with the proposed activities?	Strongly disagree
Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?	Strongly disagree
Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	<p>The Town Belt is a unique legacy in which commercial activities are not appropriate. The policy is insufficiently compliant with the Town Belt Act.</p>



[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

- Q1. Are you making this submission as an individual or on behalf of an organisation? Individual
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name: not answered
- Q3. I would like to make an oral submission to Councillors: Yes
- Q4. If yes, please give your phone number so that a submission time can be arranged: [REDACTED]
- Q5. Do you have a file you would like to upload to support your submission? Upload it here. not answered
- Q6. How much do you agree or disagree with the proposed sites? Strongly disagree
- Q7. How much do you agree or disagree with the proposed activities? Strongly disagree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)? Strongly disagree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

Through out the history of the Wellington Town Belt there have been many alienations of land and many many attempts from commercial operators to profit from the Town Belt. The Town Belt Deed, largely protected the TB from further alienation in more recent years. The Town Belt Bill, sponsored by Grant Robertson, was promoted as providing more protection for the inner Town Belt, not less. Allowing any commercial activity on the inner Town Belt sets a clear precedent, and is clearly against the intent of The Town Belt deed. As population density dramatically increases in Wellington, open space, unencumbered by commercial activities will become ever more important. Fitness training of groups of people, will inevitably alienate the general public and there are very many reserves and parks that are not on the Town Belt that could be used for that type of activity. Open space should encourage people to take their own refreshments and not be seen as another opportunity for commercial activity. Predictably there will be ever increasing pressure for more commercial activities as the desire for profit is inherent. Cleaning of animals and bikes are not suitable activities and will result in considerable use of water and detergent and bacterial run off . A very sad day for Wellington and public consultation has been nil. As a submitter on the proposed activity in 2021 I was not contacted or given the opportunity to speak to my submission. Many that have gone before have fought to retain the Town Belt and prevent alienations and encroachments and to have alienated land returned. This proposal may well undo all their hard work.






[Redacted]  
[Redacted]  
[Redacted]


[Redacted] [Redacted]  
[Redacted] [Redacted]  
[Redacted] [Redacted]

- Q1. Are you making this submission as an individual or on behalf of an organisation? Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name: The Hound Way
- Q3. I would like to make an oral submission to Councillors: No
- Q4. If yes, please give your phone number so that a submission time can be arranged: not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here. not answered
- Q6. How much do you agree or disagree with the proposed sites? Neutral
- Q7. How much do you agree or disagree with the proposed activities? Strongly agree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)? Strongly agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

It would be nice if the application process for using town belt and reserves could be rolled into the same application/registration that professional dog walkers need to do to operate. It would be even better if "professional dog walkers" as an industry could apply for the blanket approval to operate in these areas without needing to all complete individual applications. If we all have to complete individual applications to use reserves and town belt, it would be nice if this approval could have an open end date, rather than needing to reapply every year. (We are all small businesses, generally sole-traders who turn over enough money to pay one average salary. I service under 40 clients a week usually, so it's hard to spread large, regular admin cost to my customers - this is my problem as a biz owner obviously, but is something that keeps me awake at night).




Q1. Are you making this submission as an individual or on behalf of an organisation?	Organisation
Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:	The Happy Dog NZ
Q3. I would like to make an oral submission to Councillors:	No
Q4. If yes, please give your phone number so that a submission time can be arranged:	not answered
Q5. Do you have a file you would like to upload to support your submission? Upload it here.	not answered
Q6. How much do you agree or disagree with the proposed sites?	Neutral
Q7. How much do you agree or disagree with the proposed activities?	Neutral
Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?	Strongly agree
Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	I strongly agree with preapproved mobile activity on track networks as it pertains to professional dog walkers/handlers.



Q1. Are you making this submission as an individual or on behalf of an organisation?	Individual
Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:	not answered
Q3. I would like to make an oral submission to Councillors:	No
Q4. If yes, please give your phone number so that a submission time can be arranged:	not answered
Q5. Do you have a file you would like to upload to support your submission? Upload it here.	not answered
Q6. How much do you agree or disagree with the proposed sites?	Strongly agree
Q7. How much do you agree or disagree with the proposed activities?	Strongly agree
Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?	Strongly agree
Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)	

This is a fantastic initiative.



Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

Kris Bubendorfer  
Loose Leash Dog Walking Newlands Johnsonville Wellington

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Strongly agree

Q7. How much do you agree or disagree with the proposed activities?

Strongly agree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly agree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered



[Redacted]  
[Redacted]  
[Redacted]

[Redacted] [Redacted]  
[Redacted] [Redacted]  
[Redacted] [Redacted]

- Q1. Are you making this submission as an individual or on behalf of an organisation? Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name: Loose Leash Dog Walking Newlands Johnsonville Wellington
- Q3. I would like to make an oral submission to Councillors: No
- Q4. If yes, please give your phone number so that a submission time can be arranged: not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here. not answered
- Q6. How much do you agree or disagree with the proposed sites? Strongly agree
- Q7. How much do you agree or disagree with the proposed activities? Strongly agree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)? Strongly agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

Concerns have been raised about keeping areas clear of dog poop & rubbish... Can I draw your attention to the wee list of litter ect... we have picked up, removed, cleared or reported - previously submitted to by Penny to Sean Johnson 2/11/21  
Our policy is to leave an area in a better state than we find it ! Respect !



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered

Q3. I would like to make an oral submission to Councillors:

Yes

Q4. If yes, please give your phone number so that a submission time can be arranged:

[REDACTED]

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered

Q6. How much do you agree or disagree with the proposed sites?

Agree

Q7. How much do you agree or disagree with the proposed activities?


Agree

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Agree

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

I strongly support the six dog limit per dog walker that was originally included in the Policy, as it aligns with international best practice. I hope that this will form part of the council registration/approval scheme. Having time limits for some public places for dog training and dog walking seems a sensible compromise to me.



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered
- Q3. I would like to make an oral submission to Councillors:

No
- Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.


not answered
- Q6. How much do you agree or disagree with the proposed sites?

Strongly agree
- Q7. How much do you agree or disagree with the proposed activities?

Strongly agree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered
- Q3. I would like to make an oral submission to Councillors:

No
- Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered
- Q6. How much do you agree or disagree with the proposed sites?


Agree
- Q7. How much do you agree or disagree with the proposed activities?

Neutral
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered





- Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

Joyride Mountain Bike Skills
- Q3. I would like to make an oral submission to Councillors:

No
- Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.


not answered
- Q6. How much do you agree or disagree with the proposed sites?

Strongly agree
- Q7. How much do you agree or disagree with the proposed activities?

Strongly agree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Strongly agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

The approvals process is well thought out and appropriate. Great to see decisions can be made at the officer level and in accordance with management plans. We look forward to applying for a concession.



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

WORD (World Off-road Riding Department)
- Q3. I would like to make an oral submission to Councillors:

Yes
- Q4. If yes, please give your phone number so that a submission time can be arranged:
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.

not answered
- Q6. How much do you agree or disagree with the proposed sites?

Strongly agree
- Q7. How much do you agree or disagree with the proposed activities?

Strongly agree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

Thanks heaps for considering our comments from previous submissions. We love that council officers will be able to continue working closely with our organisation to make it easy and clear for us to run our activities :)




[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

- Q1. Are you making this submission as an individual or on behalf of an organisation? Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name: Central Allbreeds Dog Training School
- Q3. I would like to make an oral submission to Councillors: Yes
- Q4. If yes, please give your phone number so that a submission time can be arranged: [REDACTED]
- Q5. Do you have a file you would like to upload to support your submission? Upload it here. not answered
- Q6. How much do you agree or disagree with the proposed sites? Agree
- Q7. How much do you agree or disagree with the proposed activities? Agree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)? Agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

Central Allbreeds Dog Training School is an not-for-profit, incorporated society, who has been operating in Wellington City since 1962. While our focus has changed over that time from competitive dog obedience training to providing high quality pet dog training, our passion and commitment to the dogs of Wellington City have remained. We are a Council approved service provider, with our "Grade 2 - Practical Canines" course being an approved Responsible Dog Owner Education and Obedience course. We use public spaces for the more advanced parts of our group training classes, meaning dog/handler partnerships can prove they have skills required to meet our standard. We wholeheartedly support the proposed policy, particularly the limit of six dogs per person/handler, and requiring approval to operate in public places. While we cannot see any reference to this in the November 2021 consultation document, we hope that it remains as in the original policy. We are pleased to see the registration requirements extend to those, like us, offering dog training classes on public land. We hope the annual registration has an option for not-for-profit clubs (we are not the only club in Wellington city, and we are aware of another club operating similar classes in public) that recognises the more limited financial resources, but quality training, that is provided by such entities. Clubs/not-for-profit entities are supporting the Council's aims in having responsible dog owners, and offer a valuable service to the wider community, particularly those on lower incomes, as we charge less than commercial operators with staff to pay. Therefore, the impact of annual registration fees is far more significant to the financial viability of not-for-profit providers. We welcome the opportunity for our President and/or Vice-President to make an oral submission.



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

A.C.E. Dog Training Ltd
- Q3. I would like to make an oral submission to Councillors:

Yes
- Q4. If yes, please give your phone number so that a submission time can be arranged:
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.


not answered
- Q6. How much do you agree or disagree with the proposed sites?

Agree
- Q7. How much do you agree or disagree with the proposed activities?

Agree
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered
- Q3. I would like to make an oral submission to Councillors:

No
- Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.


not answered
- Q6. How much do you agree or disagree with the proposed sites?

Neutral
- Q7. How much do you agree or disagree with the proposed activities?

Neutral
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

Agree
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered



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Individual
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- Q3. I would like to make an oral submission to Councillors:

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- Q5. Do you have a file you would like to upload to support your submission? Upload it here.
- Q6. How much do you agree or disagree with the proposed sites?

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- Q7. How much do you agree or disagree with the proposed activities?

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not answered
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered

Kia ora-

Wellington is frequently in the top three in rankings of "Most Liveable City on Earth".

Have you ever considered why?

I'm an immigrant. I've been here for 14 years this month. I can tell you why, because I mention it in conversation nearly every day.

Green.

The amount of accessible greenery and trails and walking and hiking that literally NO OTHER capital city in the world offers.

It is unique in the world. I know, I have travelled. Sure, some cities have interesting greenery in places, but all of those places are also despoiled by coffee shops, curio vendors, bird food vendors, t-shirt shops, food carts, ice cream trucks, recreation equipment hire, giant commercial sporting events, dog washing, mountain bike servicing, movie tours, and a thousand other possible ways this amazing feature can be ruined for a quick cash injection that can be better achieved by taxing ME.

Do our green spaces require more noise and visual clutter and litter and hucksterism?

Commercialisation would be the first step in ruining our global status and our way of life.

Especially despicable in an era of needed climate remediation.

The draft policy claims all the commercial activities will be of "low impact", using the dirty dialectical trick of failing to define what "low impact" even means, and goes on to say large scale events will be allowed (by this delegated authority to officers, without public input).

Willful vagueness like this is chilling. It smells.... underhanded.

Then there is the matter of- while nominating specific large areas of the Town Belt ('sites')- it then vastly and non-specifically broadens the commercial activities' sites by saying the activities listed "can take place on any formal and legitimate track network in any reserve or Wellington Town belt..." and attaches maps of the current track networks, adding,. "In future, the Council website will provide detail of any new or additional tracks."

This could literally ruin our appeal as a place to live.

This Council is proposing commercial activities on vst areas of the Town Belt to be allowed by delegated authority to officers, quite contrary to the spirit and intent of The Wellington Town Belt Act 2016.

By lumping the sites together in the current consultation, it effectively eliminates any thought of further public consultation, and is thus quite contrary to both public interest and the intent of the Act, and instead, proposes delegated authority be given to anonymous officers to make decisions in secrecy, behind closed doors.

Is this how we run a "democracy"?

The Council and Councillors are Trustees under the Act. They, not the staff, *are entrusted to protect and enhance the Town belt's accessible natural environment, and free public recreation.*

The Wellington Town Belt Act 2016 and the subsequent management plan is the Council's guide.

The Town Belt is of unique heritage, environmental and cultural significance to Wellington and Wellingtonians.

Section 9. of the Act explains the legal status.

(1) The Council holds the Wellington Town Belt on behalf of the inhabitants of the city of Wellington as trustee of the trust created by the Town Belt Deed.

(2) The Town Belt Deed is to be read as if the only term of the trust is to forever hereafter use and appropriate the Wellington Town Belt as a public recreation ground for the inhabitants of the city of Wellington.

(3) For the purposes of subsection (2), public recreation ground means an area provided for—

(a) recreation, sporting activities, and the enjoyment of the public, with an emphasis on the retention of public access, open spaces, and outdoor activities; and

(b) the protection of the natural environment and historic heritage.

It is utterly damning that the draft proposes to get rid of the public consultation requirements, and arguably as well most of the specifics of the Act which clarify the parameters of transparent administration and management and use of the Town Belt with significant limitation on business activities.

In the words of the Queens Counsel who provided a legal opinion to the committee when they were developing the Act:

*"The Bill expresses in a complete way the basis on which the Town belt is to be made available and managed, better defines Council's powers and provides for improved transparency in its decision-making."*

But this draft policy proposes to abrogate elected Councillors as Trustees' responsibility. It is contrary to eg. sections: 9, 10, 14, 15c., 16, 17,18,19 of the Act.

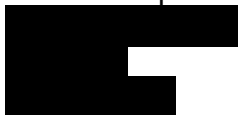
I am asking that the Town Belt (and the 30 named reserves) be excluded from the Trading and Events Policy. It is misplaced. It is diabolical. It can be the ruination of the best capital city in the world.

Please call me- I will talk to anybody about the importance of this. I literally looked at the pros-and-cons of **dozens** of global destinations before settling here 14 years ago.


Please don't ruin the best thing that Wellington has going for it.

Nga mihi nui,

Daniel M Spector







- Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

Mount Vic Residents Assoc

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

Q6. How much do you agree or disagree with the proposed sites?

not answered

Q7. How much do you agree or disagree with the proposed activities?

not answered

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

not answered

Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered



## Mt Victoria Residents Association

### Submission to Wellington City Council on the Trading and Events in Public Places Policy Statement of Proposal

From Angela Rothwell  
President, Mt Victoria Residents Association

Thanks for the opportunity to comment on this policy.

People who live in Mt Victoria appreciate the green space that is available to them, and the MVRA has a commitment to ensuring that all people have free and unobstructed access to as much of it as possible at all times.

Most people in Mt Victoria walk as their main way of getting about, so the need for good quality, accessible footpaths and outdoor spaces is vital.

#### **Town Belt**

While the Mt Victoria/Matairangi town belt is a popular destination for visitors, it also serves as our community's major source of green space. With the adoption of the Spatial Plan, and with the upcoming District Plan, we look forward to many more people being able to live in Mt Victoria. This urgently necessitates ensuring that it's available, for free, to as many people as possible for as much time as possible.

We love its trails, its grassed areas, its beautiful forest (the work of local and Wellington-wide volunteer organisations as well as WCC) and would like to retain as much natural green as possible. The nature trail is a wonderful amenity that gets loads of use from people of all ages.

We wonder at how much more activity the Council anticipates in this area. Over lockdown, we saw the paths heaving with people and dogs, and it continues to be a heavily used area. As in other areas with great mountain biking opportunities, we see that the trails are often left unfit for the multitude of walkers and runners.

There are already many commercial groups using the area – some more successfully than others – as well as numerous one-off events. It's fantastic to see Mt Victoria/Matairangi bustling and alive, and people encouraged to enjoy this beautiful area in so many ways.

We'd like to see WCC use its oversight to provide high-value, community-minded synergies – for instance, if the Bowling Club was to allow access to its toilet facilities for people using the town belt, and visitors to Pirie St park, the effect would be monumental. Despite a large number of people within the community asking for toilet

facilities to be provided, the Council have advised there are none in the plan to revamp the park. We point out that the Council is in a perfect position to reach out to a facility close by and give them a nudge to help the community out.

We'd like to see better communication from the Council to the community about these events – for instance, the party that was approved by WCC to go ahead in the Ellice St Quarry site, or mountain bike events on the hillside – so that we know when we cannot access our local green space. Will this policy provide that to us?

We've never understood why the public are regularly prohibited from accessing public space, in order to host one-off events that come as a surprise to neighbours and visitors.

These areas are public space, and should be available to the public all the time. There should be no reliance on generating revenue out of these spaces. Why can't we have free public access to these events?

We'd like to see better communication from the Council to the community about development of the park that steps out of line with the Matakairangi Master Plan – the new mtb trails, for instance. These are not being built with the Mt Victoria community in mind.


If not, we don't understand what operators of these events are being charged for.

In our previous submission, we wondered why the policy focused on Mt Victoria/Matakairangi's town belt, and now we see that other areas – Makara and Miramar, for instance – are now up for coffee carts and events and the like. We think this is good, there's a lot of bike park infrastructure there already.

What is the Council's vision for the hillside of Mt Victoria/Matakairangi?? Illustrations would be helpful.

We wonder why Mt Victoria/Matakairangi has been moved out of the Lambton Ward?

Nga mihi  
Angela (on behalf of MVRA)



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation

Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

Living Streets Aotearoa

Q3. I would like to make an oral submission to Councillors:

No

Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered

Q5. Do you have a file you would like to upload to support your submission? Upload it here.

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Q7. How much do you agree or disagree with the proposed activities?

not answered

Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

not answered

**Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)**

Centennial reserve MTB park – used to have walk-only tracks so will the MTB status limit walkers access? Lyall bay beach – how much of the beach will not be available for use at any one time? Worsley bay beach – how much of the beach will not be available for use at any one time? Cog park – how much of the park will not be available for use at any one time? Churchill park is only one section of Seatoun beach – this is the kind of limit that is required at all sites Railway Station reserve [the front of the railway station] Should include an identified clear unobstructed accessible path at all times to both signalled pedestrian crossings, with no exceptions. Wellington Botanic Gardens - Equipment hire should be limited to permitted activities, ie no bikes Glover park activity - only supports what is there now, how about mobile food carts? - recreation hire equipment should be available like kids play stuff Te Aro park - only supports existing use - include kids play equipment hire Waitangi park waterfront - the map shows the footpath included and this should remain outside commercial use, there is plenty of other space - in this case the existing café at the kids play area is not protected and mobile carts are allowed Freyberg carpark and Oriental bay beach – how much of the beach will not be available for use at any one time? - please exclude the beach and kids park from mobile foodcarts which should only locate in the car park - recreation service provision should be limited, this is a very busy beach and space is already very limited. Frank Kitts park - this is the children's playground area and more control on junk food carts is required. Parents should not have to walk a gauntlet of food carts to access the play equipment [same comment for every children's play area] Is it intentional that equipment hire is not included at all parks and different terms used? Karori cemetery - Why are food carts permitted Owiri bay quarry - Has the idea of a wild south coast disappeared? If not why would this area include mobile food carts - This area is not accessible by public transport. Te Rakaihau point - Please exclude some of the beach from any activity Makara beach foreshore - Appear to be allowing activity on a delicate native ecosystem that has been under active restoration management for many years – please ensure this is excluded - Use the car park area for all commercial activity Town Belt Mt Victoria Lookout - The map includes parts of actively managed restoration areas that should be excluded from all commercial activity - The areas for commercial activities should be limited to car park areas Mt Victoria all the rest of the park - Clearly some parts indicated on the map should not have food carts or other mobile sales points on them - Equipment hire should be consistent with the uses of each reserve. For instance mountainbike equipment only at MTB parks and there appears to be two of these in Wellington now. This is important to maintain some parks that are more pleasant for people on foot Hataitai park - The map includes a lot of the Mt Victoria Town Belt. This is all the same park and should be managed in the same way, it is not two separate parks - The velodrome is more suited to food carts etc.

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**Submission to Wellington City Council  
on Trading and Events in Public Places – Town Belt and reserves**

Contact person: **Ellen Blake**  
Email: [REDACTED]  
Date: **14 February 2022**

Overall the vision for our public places presented in the TEPP is still unclear. The policy states at the end of the first paragraph that “public spaces are primarily for public use and enjoyment.” The rest of the policy does not show how this public use will be achieved (compared to the commercial use of public places).

The proposals for use of reserves and the Town Belt allow a number of commercial uses in all of the named reserves and Town Belt, there are no places that have been excluded for only public use and enjoyment in the various parks. Only a few parks have limitations on the nature of the commercial uses and these seem to only serve to protect existing users such as at Glover or Te Aro Park. This gives the impression that the total area of these parks can now have commercial use, and that has not occurred previously. Our experience shows that this will lead to more pressure on council staff to allow these uses.

Our concern is that as walking is freely available to all people in Wellington and is a very popular activity, and there is little commercial activity providing services for walking, that people out on foot will not benefit from many of the services provided but will be impacted by these uses. For example, Waitangi Park on the waterfront is frequently closed to people on foot for various commercial events and activities. This particular park is one of the few in central Wellington, and is one of the largest green spaces available popular for people to freely spend time in.

Parks and reserves are generally intended as places to ‘get away’ from more urban environments so the expected uses in them will be different from more urban public space. The Town Belt Act supports this recreational and outside use, for instance, a quiet and green space for a stroll or a picnic. This policy needs to support people to be in public parks without hindrance, or being enticed or required to purchase services.

Our strong recommendation is that for all reserves, a certain proportion of them is allocated or reserved at all times for public use. So, for instance, it is always possible to take your kids for a walk without having to pass commercial services. Seatoun beach has only a small part allocated to commercial use and is a good model for other places.

#### TEPP pedestrians

We note that the policy objectives still refer to pedestrian use in the negative as activities need to minimise disruption to them, rather than enhance the pedestrian experience to be more enjoyable. This positive view is more important in park environments where many

people specifically go to get away from vehicles, noise and general urban busy-ness (LSA submission on the TEPP refers).

#### Preapproved activities

It is unclear what the preapproved activities are, they are not defined. If the preapproved activity is the list of identified activities, it is exhaustive and covers many activities imaginable. Some limits on this are required to ensure compatibility with parks and reserves. We would support all activities being child-friendly.

The Town Belt Act precludes some activities that are not for recreation or outdoor activity but this isn't reflected in the above list of activities, eg commercial tour or one-off event could be anything. The Town Belt status for reserves is that activities must be low impact and temporary in nature but what 'low impact' is is unclear. Is that low impact on the environment, on other users of the park or reserve?

It would be useful to include with each reserve what is consistent with the reserve status and if there is a relevant management plan for that site.

It is important to be clear on this because preapproved activities do not require public input only staff assessment.

#### Foraging

The status of foraging is still unclear. Removing any material from reserves is not usually a permitted activity and has impacts on the ecosystem.

#### Public transport

Permitted commercial activity should be located near and accessible by public transport as well as on foot or by bike.

#### Low scale / low impact activities

Mountainbike use is not low impact, and potentially not low scale. There are high numbers of riders on tracks occasionally and these have significant impacts on other users. Pre-Covid it was not unusual to see 20 + men on a bike tour hurtling downhill on all sorts of tracks on Mt Victoria. The policy needs to be clear what low scale/ low impact means.

There are many reserves where people on foot are the main users of the area and these reserves should have limited commercial opportunity for MTBs. We note it is often difficult to identify the formal tracks as there is constant churn from illegal track builders!

#### Note Trading and Events in Public Places Policy 2021

##### Footpath definition

The TEPP should use the Land Transport (Road User) Rule definition for footpath – this is a place primarily intended for pedestrian “use” not just movement. This is a much broader definition and encompasses what it means to be a pedestrian more fully (eg page 11 TEPP).

##### Pedestrians place in the policy

Pedestrians and footpaths are treated as a footnote to accessibility (ie 8.2.1), and this really limits how events or trading can enhance the pedestrian experience. The pedestrian experience is reduced to a minimum to be met not an experience to be enhanced.

##### Minimum footpath widths

It is not clear what the minimum widths are for footpaths in the TEPP. Can this be included in the policy or a link to those widths.

## **Specific reserve comments**

Centennial reserve MTB park

- used to have walk-only tracks so will the MTB status limit walkers access?

Lyll bay beach

- how much of the beach will not be available for use at any one time?

Worser bay beach

- how much of the beach will not be available for use at any one time?

Cog park

- how much of the park will not be available for use at any one time?

Churchill park is only one section of Seatoun beach

- this is the kind of limit that is required at all sites

Railway Station reserve [the front of the railway station]

Should include an identified clear unobstructed accessible path at all times to both signalled pedestrian crossings, with no exceptions.

Wellington Botanic Gardens

- Equipment hire should be limited to permitted activities, ie no bikes

Glover park activity

- only supports what is there now, how about mobile food carts?
- recreation hire equipment should be available like kids play stuff

Te Aro park

- only supports existing use
- include kids play equipment hire

Waitangi park waterfront

- the map shows the footpath included and this should remain outside commercial use, there is plenty of other space
- in this case the existing café at the kids play area is not protected and mobile carts are allowed

Freyberg carpark and Oriental bay beach

- how much of the beach will not be available for use at any one time?
- please exclude the beach and kids park from mobile foodcarts which should only locate in the car park
- recreation service provision should be limited, this is a very busy beach and space is already very limited.

Frank Kitts park

- this is the children's playground area and more control on junk food carts is required. Parents should not have to walk a gauntlet of food carts to access the play equipment [same comment for every children's play area]

Is it intentional that equipment hire is not included at all parks and different terms used?

Karori cemetery

- Why are food carts permitted



#### Owhiro bay quarry

- Has the idea of a wild south coast disappeared? If not why would this area include mobile food carts
- This area is not accessible by public transport.

#### Te Raekaihau point

- Please exclude some of the beach from any activity

#### Makara beach foreshore

- Appear to be allowing activity on a delicate native ecosystem that has been under active restoration management for many years – please ensure this is excluded
- Use the car park area for all commercial activity

### **Town Belt**

#### Mt Victoria Lookout

- The map includes parts of actively managed restoration areas that should be excluded from all commercial activity
- The areas for commercial activities should be limited to car park areas

#### Mt Victoria all the rest of the park

- Clearly some parts indicated on the map should not have food carts or other mobile sales points on them
- Equipment hire should be consistent with the uses of each reserve. For instance mountainbike equipment only at MTB parks and there appears to be two of these in Wellington now. This is important to maintain some parks that are more pleasant for people on foot

#### Hataitai park

- The map includes a lot of the Mt Victoria Town Belt. This is all the same park and should be managed in the same way, it is not two separate parks
- The velodrome is more suited to food carts etc.


### **About Living Streets Aotearoa**

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking-friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners, including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see [www.livingstreets.org.nz](http://www.livingstreets.org.nz).



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Individual
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered
- Q3. I would like to make an oral submission to Councillors:

No
- Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.
- Q6. How much do you agree or disagree with the proposed sites?

not answered
- Q7. How much do you agree or disagree with the proposed activities?

not answered
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

not answered
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered

Kia ora,

I echo the following concerns of Helene Ritchie:

Who would have thought that the Wellington Town Belt could be a place for shops, large events and businesses? Who thinks the Town Belt should be commercialised? A place for commercial opportunity? A place for the City Council to make money?

The Council first proposed this in a draft policy with the title: Trading and Events in Public Places. Wellingtonians could be excused for not realising that this might refer to trading and events on the Town Belt (and 30 reserves), and not being aware of the likely far-reaching negative impact.

This Council is proposing commercial activities on large tranches of the Town Belt to be allowed by delegated authority to officers, quite contrary to the spirit and intent of The Wellington Town Belt Act 2016.

By lumping the sites together in the current consultation, it proposes no further public consultation, quite contrary to the intent of the Act, and instead, proposes delegated authority be given to anonymous officers to make decisions in secrecy, behind closed doors.

The Council and Councillors are Trustees under the Act. They, not the staff, are entrusted to protect and enhance the Town belt's accessible natural environment, and free public recreation.

The Wellington Town Belt Act 2016 and the subsequent management plan is the Council's guide.

The Town Belt is of unique heritage, environmental and cultural significance to Wellington and Wellingtonians.

On 16 October 1841, the Governor of New Zealand notified that the reserves (the Town Belt), provided for in the New Zealand Company's plans were "reserved by the Crown for public purposes". During the early nineteenth century, social reformers called for green and open space as a means of improving the health and well-being of Citizens.

This need for green open space then called the 'lungs' of the city,' equally applies today and even more so in the future with plans to further densify Wellington City. Wellingtonians value the Town Belt as one of the three key pillars and points of difference of our city – the harbour with the hills and the proximity of the compact CBD to nature.

Fundamentally, the Town Belt is 'not for sale'. That means it is not to be commercialised. It is a prized natural environment in close proximity to the inhabitants of Wellington City.

Section 9. of the Act explains the legal status.

(1)

The Council holds the Wellington Town Belt on behalf of the inhabitants of the city of Wellington as trustee of the trust created by the Town Belt Deed.

(2)

The Town Belt Deed is to be read as if the only term of the trust is to forever hereafter use and appropriate the Wellington Town Belt as a public recreation ground for the inhabitants of the city of Wellington.

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For the purposes of subsection (2), public recreation ground means an area provided for—

(a)

recreation, sporting activities, and the enjoyment of the public, with an emphasis on the retention of public access, open spaces, and outdoor activities; and

(b)

the protection of the natural environment and historic heritage.

It is of major concern that the draft proposes to negate the public consultation requirements, and arguably as well most of the specifics of the Act which clarify the parameters of transparent administration and management and use of the Town Belt with significant limitation on business activities.

In the words of the Queens Counsel who provided a legal opinion to my committee when we were developing the Act:

“The Bill expresses in a complete way the basis on which the Town belt is to be made available and managed, better defines Council’s powers and provides for improved transparency in its decision-making.”

But this draft policy proposes to abrogate elected Councillors as Trustees’ responsibility. It is contrary to eg. sections: 9, 10, 14, 15c., 16, 17,18,19 of the Act.

The draft policy claims all the commercial activities will be of low impact, without definition, and goes on to say large scale events will be allowed (by this delegated authority to officers, without public input).

In addition, while nominating specific large tranches of the Town Belt (‘sites’) it then broadens the commercial activities’ sites by saying the activities listed “can take place on any formal and legitimate track network in any reserve or Wellington Town belt...” and attaches maps of the current track networks, adding, “In future, the Council website will provide detail of any new or additional tracks.”

This is highly concerning.

In addition to all the tracks, the sites mentioned are:

Kelburn Park and Play area

Hataitai Park

Wakefield park

Matairangi/Mt Victoria lookout

Matairangi/Mt Victoria Nature trail area

Berhampore Golf Course

Multiple commercial activities are proposed to be allowed by delegated authority. The shops, businesses, events, commercial activities mentioned are:

- Recreation equipment hire
- Recreation services provision eg. dog washing, mountain bike servicing
- Mobile food trucks and coffee carts
- Commercial tour guiding
- Commercial tours
- Commercial events that are large scale


- Regular multisport events
- Mountain bike races
- Commercial lessons and group fitness
- Professional dog walking
- Bike tours
- Bike schools
- Major events
- Umbrellas, walking sticks hire
- Bike hire
- Movie tours
- Mountain bike tours
- Commercial gardening lessons
- Educational and interpretation instruction
- Large scale, regular and multisport events

Some of the significant unintended (or some intended?) consequences and costs are:

- Financial and bureaucratic costs for the ratepayer – increased Council cost and staff for administration of these profit making commercial proposals, permissions and the licences associated with them
- Costs associated with the probable building of more carparks and consequent loss of Town Belt land for public recreation
- The possibility of large events such as Homegrown and similar loud and crowded concerts (especially on Mt Victoria)
- The possible introduction of paid carparking
- Possible freedom camping in carparks
- Rubbish
- Toileting
- Booze
- Lights
- Increased vehicles' and associated noise and pollution especially on Alexander Road and behind and on Mt Victoria
- Alienation of land by commercial businesses
- Legal costs to ratepayers of Court challenges to these proposals
- Significant damage to the natural and peaceful environment and the work of many people actively protecting and enhancing and planting in the Town belt
- Unfair competition for cafes and businesses in the CBD and suburbs paying rates and leases.

I am asking that the Town Belt (and the 30 named reserves) be excluded from the Trading and Events Policy. It is misplaced. I urge you to do the same by February 11.

Ngā mihi  
Rebecca Royal



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered
- Q3. I would like to make an oral submission to Councillors:

No
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- Q7. How much do you agree or disagree with the proposed activities?

not answered
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

not answered
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered

Gaye Bergquist

Dear Sir/Madam,


I would like to submit that the town belt land should be kept as town belt for the use of all Wellingtonians and visitors to our city.

If commercialisation of this land is allowed it would be to the detriment of the people. This land was always to be green belt NOT a place for building on in any form. Enough of it has already been taken by the WCC in past years and this should not be allowed to continue. For the good of our health, mental and physical and the beauty of our city please leave the town belt as it was always promised to be.

With Regards

Gaye Bergquist

Sent from my iPad



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered
- Q3. I would like to make an oral submission to Councillors:

No
- Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.
- Q6. How much do you agree or disagree with the proposed sites?

not answered
- Q7. How much do you agree or disagree with the proposed activities?

not answered
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

not answered
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered




The Wellington Town Belt is not for sale, not to be re-zoned in any form, shape or manner.

These areas of green were bequeathed by the forbears of Wellington for the enjoyment, recreation, and pleasure of the people of Wellington as open spaces “without hindrance.”

The Wellington City Council must not interfere with these open spaces in any manner other than to maintain them to the highest standards for the enjoyment of the peoples of Wellington and visitors to the City.

G Brandreth-Wills





- Q1. Are you making this submission as an individual or on behalf of an organisation?

Organisation
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

Friends of the Wellington Town Belt
- Q3. I would like to make an oral submission to Councillors:

No
- Q4. If yes, please give your phone number so that a submission time can be arranged:

not answered
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.
- Q6. How much do you agree or disagree with the proposed sites?

not answered
- Q7. How much do you agree or disagree with the proposed activities?

not answered
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

not answered
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered


The Chief Executive  
WCC  
Wellington


I have only just heard that WCC has put out a proposal to presumably simplify the granting of consent to minor / short term events to be held on, inter alia, Town Belt land. I have not received the original document apparently circulated to some interested parties so do not know the details of this proposal. But from my experience based on almost 30 years of being part of the Friends of the Wellington Town Belt it concerns me greatly. The difficulty of getting meaningful responses from WCC staff when matters have arisen means that I must get further involved. By way of example the original Town Belt legislation empowered almost any officer of WCC to consent to almost any proposal for commercial activity to be permitted without restrictions or public notification. This was and still is unacceptable to the Friends.

The Friends have from time to time pushed for WCC to at least have a workshop for all new Councillors after each election to bring them up to date on their responsibilities under the Act.

It may be that whenever any such proposal is lodged with Council a copy should always be forwarded to the Friends to enable them to monitor what is going on.

Please treat this letter as an objection to the proposal in so far as it could deal with Town Belt land.

Robin Buxton  
Co-chair  
Friends of the Wellington Town Belt  
10/2/2022  
Robin Buxton 



- Q1. Are you making this submission as an individual or on behalf of an organisation?

Individual
- Q2. If you are making this submission on behalf of an organisation, please state the organisation's name:

not answered
- Q3. I would like to make an oral submission to Councillors:

Yes
- Q4. If yes, please give your phone number so that a submission time can be arranged:
- Q5. Do you have a file you would like to upload to support your submission? Upload it here.
- Q6. How much do you agree or disagree with the proposed sites?

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not answered
- Q8. How much do you agree with the proposal to allow mobile activities to use the track networks (provided they comply with the rules for each area and have officer approval)?

not answered
- Q9. Is there anything else you would like to tell us about these proposed sites and activities? (please provide details if you are commenting on specific sites or activities)

not answered

## **SUBMISSION TO WELLINGTON CITY COUNCIL**

**From: Helene Ritchie**

### **Trading and Events in the Town Belt and Reserves**

**11 February 2022**

#### **Introduction**

##### **Commercialisation. The thin edge of the wedge.**

*The Council proposed policy could and will change large tranches of the Town Belt from being a free, natural environment and public recreation places into a Trading and events in public places and without any further public consultation related to the sites proposed.*

*It would appear to be contrary to the purpose, principles and many sections of Act.*

*The Town Belt (and 30 reserves) should be deleted from the Trading and Events in Public Places policy. They are misplaced there.*

#### **BACKGROUND**

The Town Belt is of unique heritage, environmental and cultural significance to Wellington and Wellingtonians.

On 16 October 1841, the Governor of New Zealand notified that the reserves (the Town Belt), provided for in the New Zealand Company's plans were "reserved by the Crown for public purposes". During the early nineteenth century, social reformers called for green and open space as a means of improving the health and well-being of Citizens.

This need for green open space then called the 'lungs' of the City, equally applies today and even more so in the future with plans to further densify Wellington City. Wellingtonians value the Town Belt as one of the three key pillars and points of difference of our City - the harbour with the hills and the proximity of the compact CBD to nature. Fundamentally, the

Town Belt is 'not for sale'. That means it is not to be commercialised. It is a prized natural environment in close proximity to the inhabitants of Wellington City.

Section 9. of the Act explains the **legal status**

“(1)

The Council holds the Wellington Town Belt on behalf of the inhabitants of the city of Wellington as trustee of the trust created by the Town Belt Deed.

(2)

The Town Belt Deed is to be read as if the only term of the trust is to forever hereafter use and appropriate the Wellington Town Belt as a public recreation ground for the inhabitants of the city of Wellington.

(3)

For the purposes of subsection (2), **public recreation ground** means an area provided for—

(a)

recreation, sporting activities, and the enjoyment of the public, with an emphasis on the retention of public access, open spaces, and outdoor activities; and

(b)

the protection of the natural environment and historic heritage.”

It is of major concern that the draft proposes to circumvent the public consultation requirements, especially but not only (S.16 (2),(4),(5), and arguably as well many of the specifics of the Act which clarify the parameters of transparent administration and management and use of the Town Belt (eg. S.3a) and with significant limitation on business activities.

In the words of the Queens Counsel who provided a legal opinion to my committee during our developing of the Act, “The Bill expresses in a complete way the basis on which the Town belt is to be made available and managed, better defines Council’s powers and provides for improved transparency in its decisionmaking.”

But this draft policy proposes to abrogate elected Councillors as Trustees’ responsibility.

As the draft is contrary to the introductory purpose, principles and legal status of the Act, it follows that it is then generally contrary to aspects of eg. sections: 9, 10, 14, 15c., 16, 17,18,19 of the Act.

The Wellington Town Belt Act 2016 comprehensively exists to serve the inhabitants of Wellington, the purpose and principles are very clear. It “imposes **responsibilities** on the Council.....” Wellington City Council has no authority whatsoever to create policy which differs from or negates the Act, (or even allows it “provided it complies with the Act”). There is no point to do that and it is morally and legally wrong.

The treatment by Wellington City Council of the Town Belt and reserves as part of the Trading and events in public places policy primarily proposes to treat the Town belt (and reserves) as commercial opportunities rather than as in law, free and accessible natural environment to be protected and enhanced as such.

The Council by doing this subverts the fundamental purpose and principles of the Town Belt and of Reserves.

Fundamentally, the Town Belt is ‘not for sale’. That means it is not to be commercialised. It is a prized natural environment in close proximity to the inhabitants of Wellington City.

**No rationale** for doing this has been given by the Council in the draft proposal. Presumably, the reasons are twofold:

- i. The Council presumes it can make some financial return from these large and crucial areas of natural environment.
- ii. In the case of the Town Belt, the Council endeavours by **lumping together** the nominated sites together, to circumvent the management of the Town Belt in cooperation with and for the inhabitants of Wellington, and circumvents additional public notification of any proposed ‘temporary’ business activities.

By waiving their **special Trustee status**, the mayor and councillors would be allowing a carte blanche blank cheque delegated authority to be passed to anonymous and often short term officers, who might have no particular commitment to this Wellington taonga to then decide the commercial use proposed, in secrecy. This is contrary to eg. S.9 and S. 16. Of the Act.

Wellingtonians value the Town Belt as one of the three key pillars and points of difference of our City - the harbour and the hills and the proximity of the compact CBD to nature. But as the Council has proposed this significant current and future altering and commercialising of the Town Belt within a report headed Trading and Events in Public Places, most Wellingtonians are not even aware of these proposals or their far reaching impact.

The Act comprehensively serves the inhabitants of Wellington.

The purpose and principles are very clear.

It specifically “**imposes responsibilities** on the Council.....”

Wellington City Council has no authority whatsoever to create policy which differs from the Act, or differs so markedly so as to abrogate its legal responsibilities neither actually nor in the spirit of the Act. T

To do that or propose to do that, is **morally and legally wrong**.

## **TWO RELATED POINTS OF FURTHER CONCERN**

It is of concern that the proposed Trading and Events in public places policy attempts to treat **both the Town Belt and classified reserves** in the same policy despite the fact that they are under different legislation.

In addition, it treats all **urban CBD** trading and events and **Town Belt and reserves, all together** in the same as policy despite quite different legal dictates.



It is further noted that while it is stated in this draft policy that the **Waterfront** is not included, it does include to the two large green open space areas of the Waterfront, Frank Kitts Park and Waitangi Park.

## **PREVIOUS AND REPEATING CONSULTATION**

I note with significant concern that in the last six months, officers and Council decision have sought consultation on their same and associated proposal, now three times:

- i. The original; Events and trading in public places policy (July; decision November 2021)
- ii. Again February 2022
- iii. The draft District Plan which proposes a Town Belt zone. December 2021 (There is no need for a specific zone as the Act and associated maps define it clearly. The 'zone' undermines it and negates the Act, which does not allow parcels of land to be taken out of the Town belt, as in a zone, only to be added.)

In addition,

- i. the six year project, which I chaired 2010-2016, involved very extensive public consultation and negotiation legal advice and ultimately resulted in The Wellington Town Belt Act 2016 being passed by the Parliament.
- ii. Town Belt management plans with consultation, are revised at least every 10 years.)

## **RECOMMENDATION**

**The Town Belt should be removed from the Events and trading in public places policy.  
The Wellington Town Belt Act 2016 stands.**

**The same applies to proposals re classified reserves. They should also be removed from the Events and Trading in public places policy.**

## KEY POINTS

I list the following key points:

### 1.0 Purpose and Principles

The Council Trading and Events in Public places Policy proposal undermines the fundamental principles and intent of the Town Belt Act 2016, and the Reserves Act 1977, and if enacted would be the thin end of the wedge.

“The Wellington Town Belt Act 2016

*Preliminary provisions*

*Purpose and principles*

#### **S. 3 Purpose**

The purpose of this Act is to—

(a)

provide a transparent statutory basis for the Council’s trusteeship and management of the Wellington Town Belt on behalf of the inhabitants of the city of Wellington; and

(b)

impose on the Council responsibilities, and provide the Council with powers, to protect, manage, and enhance the Wellington Town Belt; and

(c)

recognise the history of the original Town Belt and its significance to mana whenua and the inhabitants of Wellington

#### **Principles**

(1)

In performing its role as trustee of the Wellington Town Belt, the Council must—

(a)

recognise and provide for the protection and enhancement of the Wellington Town Belt for future generations; and

(b)

have particular regard to the following principles:

(i)

the Wellington Town Belt should be managed in partnership with mana whenua:

(ii)

the landscape character of the Wellington Town Belt should be protected and enhanced, including by recognising that it was the New Zealand Company's intention that the original Town Belt not be built on:

(iii)

the Wellington Town Belt should support healthy indigenous ecosystems:

(iv)

the Wellington Town Belt should be accessible to all and for all to enjoy:

(v)

the Wellington Town Belt should be available for a wide range of recreational activities:

(vi)

community participation in the management of the Wellington Town Belt should be encouraged and supported:

(vii)

the historic and cultural heritage of the Wellington Town Belt should be recognised and protected.

The principles in subsection (1)(b) **must be considered together** and the order in which the principles are set out is not to be taken as specifying any order of importance or priority.

## **2.0 S. 10 Public access**

Members of the public are entitled to freedom of entry and access to the Wellington Town Belt

**3.0** WCC intends to negate the public consultation requirements, and arguably most of the specifics of the Act which clarify the parameters of transparent administration and management and use of the Town Belt with significant limitation on business activities.

In particular by proposing delegation to officers, it is contrary to S. 16 and gives carte blanche to officers for commercial activities, shops and businesses, large events and charging for so-called educational activities on the Town Belt.

In the words of the Queens Counsel who provided a legal opinion to my committee, “The Bill expresses in a complete way the basis on which the Town belt is to be made available and managed, better defines Council’s powers and provides for improved transparency in its decisionmaking.”

The Council’s trading and pre-approving policies here undermine this by proposing broad ill defined and undefined pre-approved ‘one-off bundled up’ pre-approval herein, and delegation to anonymous officers and in secrecy, behind closed doors.

It is contrary (and in addition proposes to abrogate elected Councillors as Trustees’ responsibility) in **eg. sections: 9, 10, 14, 15c., 16, 17,18,19 of the Act**

#### **4.0 Not temporary activities**

The activities, shops and businesses, events are not of a temporary nature, (“less than four weeks’ duration”; or “non repetitive” as in the Act..

#### **5.0 No clarity on meaning of low impact and low scale**

The activities are described as ‘low impact’ ‘low scale’ but without definition this will be open to officer of the day, interpretation.

#### **6.0 Multiple commercial activities proposed to be allowed by delegated authority**

These commercial for profit, not free, activities, not public, but in on purpose closed off, alienated land, are given as:

- Recreation equipment hire
- Recreation services provision eg. dog washing, mountain bike servicing
- Mobile food trucks and coffee carts
- Commercial tour guiding

- Commercial tours
- Commercial events that are large scale
- Regular multisport events
- Mountain bike races
- Commercial lessons and group fitness
- Professional dog walking
- Bike tours
- Bike schools
- Major events
- Umbrellas, walking sticks hire
- Bike hire
- Movie tours
- Mountain bike tours
- Commercial gardening lessons
- Educational and interpretation instruction

**5. Large scale, regular and multisport events to be allowed by delegated authority**

The proposal is inconsistent and contradictory in itself to 'low impact, low scale' and says P. 9. "commercial events which are large scale or regular for example multisport events" will be allowed.

**6. No recognition of the Town Belt as a supreme SNA**

There is listing of SASM ("areas of significance to Maori") and SNA ("Significant Natural Areas and historic sites"), but no recognition that the Town Belt as a supreme SNA – the supreme historic and natural area of the capital City.

**7. Commercial activity to be allowed by delegated authority on all Town Belt tracks identified and attached to the policy and on new and additional ones not yet identified.**

The proposal, contrary to the Act will allow commercial activity on all identified Town belt tracks completely negating the purpose, principles and free access public recreation aspects (S.9. (and S.17 of the legislation.:

The Council proposal allows, that the activities listed “can take place on any formal and legitimate track network in any reserve or Wellington Town Belt...” Attached to that statement six maps showing the current track networks, and goes on to say, “In the future, the Council website will provide detail of new and additional tracks.” P. 6 draft policy

This is highly problematic and concerning.

#### **8. More carparks lots**

More carparks lots will be needed on Town Belt land, “A vehicle associated with the activity would be parked on the listed land parcels.” P.6

#### **9. Free access denied to parts of the Town Belt**

Parts of the Town Belt will be closed off, no longer available to all the inhabitants and alienated for the commercial activity for a period or periods.

#### **10. Significant negative impact on the natural environment**

There will be significant negative impact on the natural environment, tree planting and weed clearing and extensive voluntary work by many Wellingtonians determined to protect and enhance the natural environment as intended.

#### **11. Significant unintended consequences**

Some of the significant unintended (or some intended?) consequences and costs are:

- Financial and bureaucratic costs for the ratepayer - increased Council cost and staff for administration of these profit making commercial proposals, permissions and the licences associated with them

- Costs associated with the probable building of more carparks and consequent loss of Town Belt land for public recreation
- The possibility of large events such as Homegrown and similar loud and crowded concerts (especially on Mt Victoria)
- The possible introduction of paid carparking
- Possible freedom camping in carparks
- Rubbish
- Toileting
- Booze
- Lights
- Increased vehicles' and associated noise and pollution especially on Alexander Road and behind and on Mt Victoria
- Pollution/climate change
- Alienation of land by commercial businesses
- Legal costs to ratepayers of Court challenges to these proposals
- Significant damage to the natural and peaceful environment and the work of many people actively protecting and enhancing and planting in the Town belt
- Unfair competition for cafes and businesses in the CBD and suburbs paying rates and leases.

### **IN CONCLUSION**

I am asking Councillors as trustees of the Town Belt, **to delete** the Town Belt from the Trading and Events in Public places policy.

It is totally misplaced there, and is contrary to many sections of the Act.

I am asking that Councillors as Trustees instead and in the "inhabitants" interest, to insist that the Council and officers use the carefully crafted Wellington Town Belt Act 2016 and the subsequent Town Belt management Plan to guide the administration, management and use of the Town Belt.

*Helene*

Helene Ritchie

M.A., B.A., B.A. Hons, Dip. Ed. B.Ed. Studies, Dip. Business Studies (dispute resolution),

Former deputy mayor; former Chair of the Wellington Town Belt committee leading the development of protective legislation 2010-2016 and the creation of The Wellington Town Belt Act 2016,

Chair The Wellington Civic Trust

#### NOTE

- i. I have focussed on the Town Belt. Because of time constraints, I have not addressed the concerns related individually to the 30 reserves and the commercial activities proposed to be allowed there also by delegated authority.

I would seek the same exclusion of classified reserves from the Trading and Events in Public Places Policy for the same reasons – in general, contrary to the intent of their protective legislation. All sites mentioned are extensive and lack specificity.

- ii. I do however, express particular concerns relating to:

Makara foreshore,

Karori Cemetery (a culturally insensitive proposal, for all cultures, and especially mana whenua and tangata whenua to have food/coffee carts etc. there).

Otari a cart could take up a carpark on the roadside, not on Otari land (including carpark)

Brooklyn Turbine (which would encourage shuttle mountain biking)

Owhiro Bay/Te Kopahau-Red Rocks

- iii. I am now Chair of the Wellington Civic Trust. Both The Trust, and I personally have repeatedly made submissions to all of this. Due to time constraints I am presenting this as a personal submission. However, the previous Wellington Civic trust submission of August 2016, is attached in the email sent. It still stands.