

**Draft Point Dorset reserve management plan – submission form**

We welcome your comments on the draft reserve management plan for Point Dorset Recreation Reserve.

You can have your say:

- by filling out this form and freeposting it back to us
- by making a submission in writing and sending it to us by
  - Post: Freepost, Point Dorset (REPL01), Parks and Gardens, Wellington City Council, PO Box 2199, Wellington 6140
  - Fax: 801 3155
- by completing the submission form online at Wellington.govt.nz
- by emailing openspace@wcc.govt.nz

Please phone Wellington City Council on 499 4444 for more information.

Submissions close 5pm on Monday 15 August 2011.

**Submitter details**

\* Mandatory fields

Mr /  Mrs /  Ms /  Miss /  Dr (circle one)

First name/last name\* Curtis Nixon

Street address\* 19-493 Adelaide Rd Wellington

Phone/mobile 0A 3800167 0273529284

Email curtisantonynixon@gmail.com

I am making a submission

As an individual       On behalf on an organisation      Name of organisation \_\_\_\_\_

I would like to make an oral submission to the City Councillors.       Yes       No

If yes, provide a phone number above so that a submission time can be arranged.

**Privacy statement**

All submissions (including name and contact details) are published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public as part of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

**Overall, do you support the general direction and objectives of the draft plan?**

Yes       No  
 Why? Point Dorset has been underutilized and under-developed for years so I fully support the plan.

**Overall, do you support the policies and changes proposed?**

Yes       No  
 Why? Yes. Although I don't support over vigorous clearing pines, pohutukawa, kare and gorse. Interplanted with desirable natives. Next clearing hillside leaving it exposed and erosion-prone. And the dog access should be worked out in a compromise (contd)

Is there anything you feel has not been adequately covered by this plan?

(cont'd...) was - obs off-leash on Breaker Bay side - on lease from the point back to the Steeple Rocks and Seafoam beach.

Do you have any additional comments? Please attach any additional pages.

- pines, karo, pohutukawa: Imby pines, plant rot, rabbit damage to taupea on Breaker Bay - urgent pest control needed

- see additional page

Fold here


Thank you for your submission.

Please return this submission form by 5pm Monday 15 August 2011

Fold here 2<sup>nd</sup>

Freepost Authority Number 2199

Absolutely  
POSITIVELY  
ME HEKE KI PŌNEKE  
WELLINGTON CITY COUNCIL Wellington

Free   
NEW ZEALAND POST  
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Point Dorset Reserve Management Plan (REPL01)  
Parks and Gardens  
Wellington City Council  
PO Box 2199  
Wellington 6140

Mike Oates  
CAB 5

Tape or staple here

# Additional comments on Point Hisset Reserve Management Plan - Curtis Nixon (14)

I want to clarify some points.

- Regarding dog exercising, it seems that there is some pressure from dog owners to change the access to off-lead. I propose a compromise where the current status remains up to the point but ~~the~~ a change be made allowing off-leash dog exercising on Breaker Bay beach from the point back to the carpark access point. This would encompass current practice by many dog owners. The penguin nesting sites are mainly up steep banks meaning less desirable places for dogs to go and the open space of the beach would allow good exercise area and owner supervision.

- Rabbit damage to the bark on the trunks of tupaia around the point is serious and getting worse. Pest control needs to be a high priority.

- I suggest that strategies to buy the private land adjacent to the reserve are looked into as this land would add a significant extra area to the reserve allowing full weed and pest control from one thing - if this is not done there will always be a reservoir of pest plants and animals ready to re-colonise cleared areas; plus the continuity of the reserve will be enhanced.

- I suggest managing out large, old, pines - leave them until they fall naturally. Any dangerous ones should be removed. I am suspicious of attacking gorse, broom and bone seed. Too much clearing of them will leave the hillsides bare and prone to wind damage and erosion. Pohutukawa and karo need to be accepted as acclimatized natives which it would be pointless to remove ~~and~~ as this is a fight that never can be won.

Thanks Curtis Nixon

Submission – Point Dorset: Reserve Management Plan due 15<sup>th</sup> August 2011

Rosamund Averton  
12/17 Brougham Street,  
Mount Victoria,  
Wellington 6011

Mike Oates: Manager of Open Spaces and Recreation Planning,  
Wellington City Council,  
P.O Box 2199,  
Wellington 6011.

[Mike.Oates@wcc.govt.nz]

I make this submission as an individual and acknowledge that many of the issues I raised in my submission on the "Discussion Document" have been resolved consequently this submission will be brief.

I substantially support this proposal and do not wish to be heard but ask that I am kept informed of hearing dates. Thank you.

The remedies I seek are listed at the end of this submission.

Submission:

Again I have completed a thorough site survey using the new map provided in the Draft Management Plan (DMP). I am delighted that an Archaeological Authority has been obtained and that some of the boundaries have been defined.

Coastal Environment:

I remain supportive of the restoration of the site but am concerned that there will be little to indicate the mixed vegetation that grew on this exposed site. A proliferation of sedges, grasses will protect the sand dunes and provide havens for ground mammals but the result will be monochrome.

I reiterate that the area should be beautified with a mix of plants both "exotic" and local that will survive happily, provide nurture and shelter for fauna and prevent erosion. (eg:Kapuka, Karamu, Red Matipo, creeping Fuschia, Horokaka etc)

Maori cleared the forests on the site [ ' Castles in the Sand' -Raewyn Peat (Craig Potton 2009)] At the time of Maori occupation the area was covered with: "Ferns mixed with flaxes, small shrubs (unidentified), koromiko, tutu and light bush (unidentified) ....karaka on the coastline pre 1850" [ 'Early Wellington' Louis Ward (Capper Press facsimile 1975)]. Archaeological and

Moa hunting sites have been identified on Point Dorset [‘Hostile Shores’ – Bruce McFadgen (Auckland University Press 2007)].

As it would be impossible to “restore” the site to its pre-occupation status much better to preserve what is and make it more attractive.

Pohutukawa and Karaka can survive on this promontory those that are there should be left to continue staving off erosion, providing for fauna and adding to the attractiveness of the site whilst providing shelter, shade and sentinels for walkers.

I support the proposal to deter by waymarking the more fragile routes.

#### Coastal views and landscape:

The grassed lookout area should be enhanced by the erection of a replica stone crescent shaped viewing area like that at Churchill Park should be built. It is important that any seating fits into the space and is not obtrusive, hence my suggestion that it be made of stone. Interpretation panels commemorating the pā should be discreet and set into the stone framework. I note that there is already an oxide red Pou on site just above the first junction. It is important that any installations be discreet but I acknowledge that some wind protection for the unwary would be useful.

O-Rua-Iti seems to be the first name used for the ridgeline of this site. It is likely that Rua potatoes originated on this site [‘Miramar Peninsula’ – John Struthers [Self published 1975] story repeated in WCC Eastern Walkway guide.

It is noted by Bob O’Brien [‘Waka, Ferry, Tram’ – self published 2001] that according to Major Crawford there was “no significant Maori presence when Pakeha began arriving in the mid 19<sup>th</sup> Century” It is also noted that Major Crawford was a “keen enthusiast in arboriculture” planting “Pohutukawa, Karaka, Pine, Cabbage tree pines supplemented by numbers of native shrubs”.

Alexander Turnbull Library holds the S.C Smith Collection of photographs of this area there are some photographs from this collection shown in the ‘Miramar Peninsula’ – Kenneally (Colonial Association 1984).

#### 4. Recreation:

I agree that the site needs both locational and directional signage. This is one site (Queens Park would be another candidate) that would benefit from giving each track a number for easy reference on a map.

I do not support a shared path around the site as part of the Great Harbour Way. But would support a coastline route being marked to Owhiro Bay going south and to Cobham Drive going north.

I support the proposal to prevent cyclists using all or any of the routes at Fort Dorset. Sand dunes should be protected and not treated as roadways.

I remain equivocal about the erection of another Pou about 50 metres from the present one. Such an installation would diminish the significance of the one by the junction close by. Perhaps the existing Pou could be moved. The concrete blocks close by should be identified as the remnants of the military use of the site. (eg: an interpretation panel like that on the lookout above Orangi Kaupapa - Te Ahu Mairangi Ridgeline – Tinakori Hill).

The literature shows that waka approached the area from the South through the heads so a logical place for another Pou might well be just past the carpark site on Breaker Bay where a stand of healthy Karaka were felled by Council a few years ago to create an exposed car-park.

Plaques should be placed on each of the various gun emplacements including that hidden in a stand of trees along the ridgeline towards Breaker Bay Road – Brandas Pass.

Waymarkers should be placed by each intersection of tracks. The numbering should be sequential and logical anticipating that most people will arrive at the site from Churchill Park which is close to the Bus terminus and various car parks.

I imagine that the seat referred to at Ludlum Street is not the backed seat by the lavatories but the attractive stone crescent seat referred to above. It is a model of the stone workers art whilst offering respite and shelter.

**All** of the tracks need upgrading!

I support the proposal to upgrade the formal steep, rocky and skittery access route from the Pass of Branda by constructing steps with the addition of a handrail. This would be ideal spot for a locational directional sign showing the link from peninsula to Fort Dorset.

I understand that some of the old paths are on private, school land; they do however provide useful links and are relatively protected from southerlies. Consideration should be given to the retention, with owners consent, to the undertrack that leads to the beach track access route.

I have obtained maps from City Archives showing the subdivisions that have taken place on the whole site since the 1920's and also some early survey maps going back to pre-1900. It appears that there may be an access route

(paper road) between houses leading from Mantell Street to the Ridgeline; if so it should be given a directional sign. There are many trails that lead down and around the site generally they offer pleasant alternatives to the very rough "formal" trails.

The coastline track could easily and discreetly be upgraded with the installation of a boardwalk around the "Pinnacle" rocks. A discreet plaque that explains the geological story could be installed on the gun-emplacement!

Rubbish bins should be placed so that dog walkers have somewhere to place "dog poo".

A bin is also needed near the popular beach site just below the main dune "climb" from the beach to the ridgeline. Incidentally there are at least three access points from the beach from this recreation area plus a steep cliff for human mountain goats to climb.

The first "informal" access point is the steepest and leads to a narrow, hair-raising, rocky escarpment, the second is steep<sup>4</sup> and leads to a junction on what may be the main trail, the third is a sand dune -steep<sup>3</sup> and unstable, it turns right before reaching the ridgeline. It is unlikely that people will heed waymarkers that try and deter them from this "exciting" area. It would be better to formalise and indicate which route is the least harmful to the sand dunes.

A standard water tap, for topping up drink bottles, should be installed by the lavatory in Churchill Park and each of its "installations" should be described as such things now are around Parliament Buildings.

WCC should ask NZTA for:

A directional sign showing the route to the Seatoun Tunnel from Churchill Park along the Parade and then left, the present signage is visible only when one is driving from the Parade to Ferry Street.

A directional sign showing the route from Ferry – Forres - Inglis Streets to Brandas Pass, this useful route is not signposted and nor is there any indication that there is a coastal road going back to Owhiro Bay etc.

Please do not hesitate to contact me [3851 495] for any clarification of the points raised.

Thank you for this opportunity,

Rosamund.

Rosamund Averton.

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**Fiona Johnson**

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**From:** Michael Oates  
**Sent:** Friday, 12 August 2011 2:35 p.m.  
**To:** Fiona Johnson  
**Subject:** FW: Draft Point Dorset Reserve Management Plan

Mike Oates  
Manager Open Space and Recreation Planning City Services Wellington City  
Council Box 2199 Wellington New Zealand  
04 803 8289  
021 227 8289  
michael.oates@wcc.govt.nz

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-----Original Message-----

**From:** deb.hurdle@sparc.org.nz [mailto:deb.hurdle@sparc.org.nz]  
**Sent:** Friday, 12 August 2011 12:10 p.m.  
**To:** Michael Oates  
**Subject:** Draft Point Dorset Reserve Management Plan

The following details have been submitted from the Draft Point Dorset Reserve Management Plan form on the [www.Wellington.govt.nz](http://www.Wellington.govt.nz) website:

**First Name:** Deb  
**Last Name:** Hurdle  
**Street Address:** 68 Falkirk Ave  
**Suburb:** Seatoun  
**City:** Wellington  
**Phone:** 021 871199  
**Email:** deb.hurdle@sparc.org.nz

I would like to make an oral submission: Yes



~~I am making this submission: as an individual~~

Do you support the general direction and objectives of the draft plan: Yes

Why do you support the general direction and objectives of the draft plan: I feel you have taken on board the public's concern to keep the look and feel of the area as rugged and natural as it already is, but with some improvements in access and native plants

Do you support the policies and changes proposed: Yes

Why do you support the policies and changes proposed: with the exception of the decision around dog access

Is there anything you feel has not been adequately covered by this plan: I do not believe you have fully considered the arguments raised around off lead dog walking. Dog walkers are heavy users of the tracks and tend to use the tracks before business hours and before other users are out and about. On this basis there is no reason why you couldn't impose time restrictions like you do for dog accessible beaches, i.e. dogs can only be off lead before 9am and after 7pm in day light saving months.

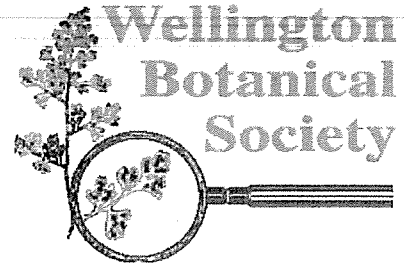
While I agree that there should be protections in place for penguins and other shore birds this can be done without a blanket on lead policy.

The area could be on lead only during penguin breeding season. Signage could be erected at access points and the area policed during this time. I do not believe that would cost more from a policing perspective as the animal management people are constantly policing the area already.

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PO Box 10-412  
Wellington 6143  
New Zealand



Charities Commission Registration CC10518

15 August 2011

Point Dorset Reserve Management Plan  
Parks and Gardens  
Wellington City Council  
PO Box 2199  
WELLINGTON 6140

Openspace@wcc.govt.nz

### **SUBMISSION: POINT DORSET RESERVE MANAGEMENT PLAN (REPL01)**

**Submitter: Wellington Botanical Society**

**Contact details:** Bev Abbott, 40 Pembroke Rd, Northland, Wellington 6012 (submissions coordinator)

[bevabbott@xtra.co.nz](mailto:bevabbott@xtra.co.nz)

Phone 475 8468 (H).

The objectives of the Wellington Botanical Society include:

- to encourage the study of botany, the New Zealand flora in particular
- to create an interest in, and foster an appreciation of, the native plants in the field
- to collect and disseminate knowledge of, and encourage the cultivation of native plants
- to advocate the preservation of lands and waters under protected area statutes in their natural state
- to make, or to join or to cooperate with any other group in making representations on any existing, draft or proposed legislation, regulation or planning document having any repercussions on the preservation or protection of the flora of New Zealand.

### **INTRODUCTION**

Thank you for the opportunity to present this submission. If hearings are held, we would like to speak in support of this submission, and make additional comments.

### **OUR RESPONSES TO THE FOUR QUESTIONS ON THE SUBMISSIONS FORM**

Overall, we support the general direction and objectives of the draft plan.

Overall we support the policies and changes proposed.

We have made recommendations relating to sections 2.4.2, 3.4.1, and 4.4.1) where we consider management issues have not been adequately covered in the plan.

Our main additional comment is that we would like Council and the Trust to start taking steps to acquire the adjacent private land in order to protect its values. This is consistent with policy 6.2.3 Reserve Acquisitions. Our reasons are in the next section.

### **Acquiring additional land for the reserve**

The excellent aerial cadastral photograph (Map A), depicting the reserve and its setting south and east of Seatoun, also serves to show the potential for increasing the size of the reserve if Council and the Trust were to be able to acquire the private land, indicated by the hatched area, contiguous with it. We believe that this substantial area of land, with significant landscape values, and its mix of indigenous, exotic, and mixed indigenous/exotic plant communities, used for decades by visitors as if it were part of the reserve, should become part of the reserve.

#### **Oruaiti Pā (in 2.1.1)**

The fact that this historic site, which also has landscape and botanical values, “ ... was mainly on the adjacent privately owned land”, gives rise to our recommendation for purchase of the site.

#### **Fort Dorset (in 2.1.2)**

The fact that this historic site, which also has landscape and botanical values, is partly on private land (see Map C), gives rise to our recommendation for purchase of the site.

**Recommendation:** that Council and the Trust enter negotiations with the owner of the land contiguous with the reserve, with the aim of acquiring the land for addition to the reserve.

**Recommendation:** that Council and the Trust, having acquired the land, seek to have it gazetted as Scenic Reserve and Historic Reserve, under the Reserves Act 1977.

We believe that this acquisition, gazettal, and protection under the District Plan, would be consistent with that part of 1.4 Vision stating “... and where appropriate restore the cultural, historic, landscape, ecological, and recreation features ...”

We also believe that this acquisition would be consistent with 1.5.1 Environment Strategy.

## **Comments on the draft management plan**

### **Section 2: Culture and History**

#### **2.3 Objectives**

We support the objectives.

#### **2.4 Policies**

We support the policies.

##### **2.4.2 Protecting heritage**

**Recommendation:** we recommend adding a further bullet point—that Council and the Trust enter negotiations with the owner of the land contiguous with the reserve, with the aim of acquiring the land for addition to the reserve.

### **Section 3: Landscape (page 12)**

We note that “The private land links the reserve to houses south of the school site, and provides an undeveloped green buffer, any extension of the built environment will impact on the views of the Point for Seatoun residents”. This reinforces our recommendation that the private land be purchased.

#### **3.3 Objectives**

We support the objectives.

#### **3.4 Policies**

We support the policies, subject to 3.4.1, second bullet point being amended to “Only *locally sourced*, low-growing *native* coastal plants will be planted near the lookout area”.

### **Section 4: Ecology (page 14)**

#### **4.2.1 Pests and weeds**

We compliment Council on the coverage given to the serious weediness of the site, including the contiguous private block. These infestations, coupled with the presence of rabbits and other pest animals, indicate the level of effort required by Council, the Trust, and the local community, to restore the site to a functioning indigenous ecosystem.

#### **4.3 Objectives**

We support the objectives.

#### **4.4 Policies**

We support the policies, except that in 4.4.1 Pests and weeds, we recommend that bullet points 3 and 4 be amended so that pōhutukawa and conifers *will* be removed.

**Reason:** We believe that their removal is essential “to enable restoration”.

### **Section 5: Recreation and access (page 20)**

#### **5.3 Objectives**

We support the objectives.

#### **5.4 Policies**

We support the policies.

### **Section 6 Administration (page 24)**

#### **6.1 Objectives**

We support the objectives.

#### **6.2 Policies**

We support the policies.

We consider the full implementation of policy 6.2.3 Reserve acquisitions, i.e. the purchase of the private block, referred to earlier, to be critical to the protection of the landform and ecosystems of the existing reserve.

We welcome the stance indicated in 6.2.6 Encroachments.

**In 6.2.7 Utilities/infrastructure.**

*Recommendation:* that any new above-ground facilities be co-located on existing structures, thus avoiding the construction of new towers.

**Section 7: Implementation plan (page 26)**

We welcome the decision by Council to spend up to \$400, 000 from the Plimmer Bequest on the Point Dorset/Breaker Bay restoration project.

**Appendix One: Species recommended for planting on Point Dorset (page 27)**

Species listed by John Buchanan (1872), or by James Crawford (1872), would be appropriate.

Bev Abbott  
Submissions Co-ordinator  
for Wellington Botanical Society

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## **Submission on the Draft Point Dorset Reserve Management Plan**

**Submission on behalf of:** Royal Forest and Bird Protection Society of New Zealand Inc. – Wellington Branch

**Contact:** Jenny Lynch  
PO Box 631  
Wellington 6014  
[j.lynch@forestandbird.org.nz](mailto:j.lynch@forestandbird.org.nz)  
021 476 343 or 04 801 2766

I would like to make an oral submission in regards to the draft plan.

### **General Comments**

The Wellington branch of Forest & Bird support the general directions of the draft plan and the proposed policies and changes. Natural Wellington, a document produced by Wellington Forest & Bird, identified Point Dorset as one being regionally representative of coastal vegetation and at the time had no protection. We are therefore pleased that it now has reserve status and also that the Council has a plan and funds for its restoration.

The Wellington Branch of Forest & Bird would welcome the opportunity to be actively involved in the restoration of Point Dorset in partnership with WCC.

### **Specific Comments**

#### **4.2.1 Pests and Weeds**

The site assessment has shown the extent of weed contamination of the site and reinforces our view that greater emphasis and resources need to be applied by WCC to weed reduction across the whole of Wellington.

The removal of pohutukawa may prove controversial amongst the community due to its high visibility and association with coastal New Zealand. However, we support its removal due to it being beyond its natural range in Wellington, its potential to hybridise with northern rata and its propensity to become a coastal weed. Forest & Bird suggests that northern rata be planted in place of pohutukawa that are to be removed from Point Dorset.

In regards to mammalian pests, Forest & Bird's Places for Penguins project is willing to provide volunteers to help control mammalian pests through trapping as an extension of the current trapping programme at Tarakena bay.

### **4.2.3 Ecological Restoration**

Forest & Bird supports the objectives and proposed direction of the ecological restoration of Point Dorset. We, along with our Places for Penguin project, are willing to support the restoration of the area through consultation of planting priorities and outcomes, as well as potentially providing volunteers.

We would expect the ecological measures for assessing the effectiveness of the programme to be published and the results easily accessible by the public.

### **4.2.4 Human Impacts**

Forest & Bird support better signage in regards to marking tracks and limits on catch or harvests from the rocks of the point.

Dog control is of obvious importance to our Places for Penguins project that currently has nesting boxes in the area. We recognize the importance of the area for dog walking, however the area should remain an on leash area to ensure dogs are under control at all times to reduce the risk to little blue penguins and other wildlife. Dogs are known to have killed penguins in nearby Shelly Bay and other coastal areas in Wellington.

Anecdotal and observational evidence suggest that the current on leash designation for dogs at Point Dorset is frequently not adhered to by dog walkers. Signage for the area should also include a reminder for dog walkers to keep their dogs on a leash at all times and the reasoning behind it.



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email: [openspace@wcc.govt.nz](mailto:openspace@wcc.govt.nz)

10 Laurent Place  
Kingston  
Wellington  
14th August 2011  
tel 043898071  
email: [mgtaylor@kol.co.nz](mailto:mgtaylor@kol.co.nz)

Draft Point Dorset Reserve management plan

Dear Councillors,

Below is my submission on this draft plan. I have lived and worked in Wellington since 1980. My interests include outdoor recreation, conservation and the environment. Over the last two years or so I have visited some part of the Reserve every few months and have cycled and walked the length of the Reserve or coast three or four times. My feedback is based on the online document, 2011-08-pointdorset-plan.pdf, to which in my submission I refer as "the Plan". I also refer to the Point Dorset Recreation Reserve as "the Reserve". I would like to be heard in support of my submission and ask to be contacted that that may be arranged.

Yours faithfully,

Michael Taylor

.....



(A) 1.1 Purpose of this plan (page 1):

This needs strengthening. To say the objectives and policies only “give guidance” leaves too much room for actual actions to deviate from the Plan after it has been finalised and so is beyond the normal public consultation process. I appreciate that timing of actions may depend on the timing of the necessary funding and also that erosion, pest invasion etc cannot be precisely predicted. However, the objectives and policies generally are worded broadly (e.g. “where appropriate”) and avoid too much detail, so that they provide enough flexibility without being downgraded to guidance. I agree that the Plan provides a clear framework, with a lot of background research having been well documented. I ask that “give guidance for the” be replaced by “explain the intended”.

(B) 1.4 Vision (page 3):

I support the Vision.

(C) 1.8 Co-management (page 4):

This co-management seems to be a sensible approach. However, I do ask that the Plan explicitly require WCC make the annual report available to the public. It would be unreasonable if it were available to only “Wellington City Council and Taranaki Whānui”. I know the Local Government Official Information and Meetings Act might be able to be used to gain access but, like other reports, it should automatically be made public (e.g. via the WCC website).

(D) 2.3 & 2.4 Objectives and Policies (for culture and heritage) (page 10 onwards):

I note from my own observation, and statements in the plan (e.g. “Most of the remaining military structures from Fort Dorset are in poor condition; they have become overgrown with vegetation and also have graffiti. Some are unsafe.”), that much of the physical heritage value has been destroyed or significantly damaged. As a result I believe the Plan should put less emphasis on “keep, maintain, repair and strengthen” these and more on interpretation and recognition. There are other, better examples of “european fortifications” in Wellington. Physical work in the Plan would generally be better used to protect, enhance and restore landscape, ecological, and recreation features, with interpretation including any necessary further research and recording, being the main emphasis for such heritage values.

(E) 3.x Landscape (page 12 onwards):

I strongly support this section. Protecting the natural character and views (3.2.1 and 3.2.2) is essential for the Reserve's value. My own visits to the area are to enjoy those views and the “wild rugged”, comparatively natural coast. I strongly oppose structures in the lookout area. I ask the Plan explicitly state as an additional policy that a consent application, or proposal to change the District Plan, to allow any additional structure or extension of the built environment that would impact on the Reserve's views or landscape character would be incompatible with the Plan's vision and objectives and would be opposed. The Plan should not appear neutral as the wording here does. Although outside the scope of this Plan I note that the location of the telecommunications tower suggests the District Plan itself needs strengthening

(F) 4.x Ecology (page 14 onwards):

I strongly support this section, including its objectives and policies. I trust that the sort of monitoring specified in 4.4.3 will also be applied to monitor the results of all actions taken within section 4.4.x

I note that WCC here recognises that Pohutukawa is an introduced species, effectively a pest, and urge that it make no new plantings of Pohutukawa anywhere in the city.

(G) 4.2.4 Human Impact (page 18); 5.2.3 Dogs (page 22); 5.4.1 Policies (page 23):

I strongly support requiring any dog in the Reserve to be on-lead and under control. I note a recent trend to circumvent the on-lead requirement through the use of "dog reels", which allow dogs to roam ten metres and more from their nominal controller. I ask that the Plan, and, when reviewed, more generally the Dog (Control) Policy, ensure that use of such reels, or any other type of "lead" longer than two metres, be classified as "off-lead". Any change to the Dog (Control) Policy should not be allowed to weaken this Plan and so not override any restriction placed on the Reserve by the Plan.

(H) 5. Recreation and Access (page 20 onwards):

I agree that access and track conditions have serious problems which detract from the enjoyment of the Reserve. I support the closure of informal or short-cut tracks that go through areas of high ecological value.

(I) Map F (page 21):

It appears that the Ludlam and Hector Street entrances have been transposed in this map.

(J) 5.4.1 Policies (page 23):

I ask that the Plan include provision of tide timetable and guidance displayed near the Breaker Bay and Ludlam Street entrances. This will assist those walking (or cycling see (K)) the "coastal route" (i.e. round the coast at beach level) as use of that route depends on the tide.

(K) 5.4.1 Policies - The reserve is closed to the following activities: (page 23):

I agree that the current tracks on the hill and high ground are unsuitable for mountain biking. However, it is possible at the right state of the tide to cycle round, with the some "portages", on the "coastal route". While the beach is mainly outside the Reserve and so presumably not affected by the Plan, at the northern end it appears to be within the Reserve and the use of the track south of Ludlam Street entrance (for around 250m) also provides good access, without, I believe, compromising natural values or creating conflict between users. I therefore ask that allowing mountain biking from Hector to Ludlam Street entrances be extended south to the beach at that point just north of where the "dunelands" are on the slopes and on the beach where that is in the Reserve. Note that the beach on the seaward side of the "dunelands" provides safe (with no damage to the dunes) and easier (for the traveller than on the slopes) passage. There it also appears to be outside the Reserve.

(L) 6.1 Administration (page 24):

I ask that "and public consultation" be added after "appropriate recreational activities".

(M) 6.2 Policies (page 24):

I am concerned that this section seems to introduce into the Plan a whole set of new, many permissive, conditions (allowing closure, exclusive use, utilities, approving legal access for utility companies etc) which may limit the appropriate management of the reserve. It seems to do so without any specific justification. Indeed no evidence is offered as to whether some of the policies can actually apply. As examples: there is no list of the existing encroachments "all of which" are to be removed; there is no list of the existing legal motor vehicle accesses by utility companies which the Plan here allows.

I ask that "are likely to" be replaced by "may" in 6.2.10. This is public land, set aside for the people and nature, not for profit, and if there is any chance that a commercial activity might affect the public's enjoyment of the reserve that activity must not be allowed.