
ORDINARY MEETING

OF

**OUTER GREEN BELT MANAGEMENT PLAN HEARING
SUBCOMMITTEE**

AGENDA

Time: 1:30pm
Date: Wednesday, 17 April 2019
Venue: Ngake (16.09)
Level 16, Tahiwi
113 The Terrace
Wellington

MEMBERSHIP

Councillor Calvert
Councillor Fitzsimons
Councillor Foster
Councillor Gilberd (Chair)
Councillor Lester
Councillor Sparrow
Councillor Woolf

Have your say!

You can make a short presentation to the Councillors at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 04-803-8334, emailing public.participation@wcc.govt.nz or writing to Democracy Services, Wellington City Council, PO Box 2199, Wellington, giving your name, phone number, and the issue you would like to talk about.

AREA OF FOCUS

The Outer Green Belt Management Plan Hearing Subcommittee is responsible for accepting and hearing submissions on the review of the proposed Outer Green Belt Management Plan and make recommendations for changes to the Plan to the City Strategy Committee.

Quorum: 4 members

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1. Meeting Conduct

1.1 Apologies

The Chairperson invites notice from members of apologies, including apologies for lateness and early departure from the meeting, where leave of absence has not previously been granted.

1.2 Conflict of Interest Declarations

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

1.3 Confirmation of Minutes

The minutes of the meeting held on 16 April 2019 will be put to the Outer Green Belt Management Plan Hearing Subcommittee for confirmation.

1.4 Items not on the Agenda

The Chairperson will give notice of items not on the agenda as follows.

Matters Requiring Urgent Attention as Determined by Resolution of the Outer Green Belt Management Plan Hearing Subcommittee.

The Chairperson shall state to the meeting:

1. The reason why the item is not on the agenda; and
2. The reason why discussion of the item cannot be delayed until a subsequent meeting.

The item may be allowed onto the agenda by resolution of the Outer Green Belt Management Plan Hearing Subcommittee.

Minor Matters relating to the General Business of the Outer Green Belt Management Plan Hearing Subcommittee.

The Chairperson shall state to the meeting that the item will be discussed, but no resolution, decision, or recommendation may be made in respect of the item except to refer it to a subsequent meeting of the Outer Green Belt Management Plan Hearing Subcommittee for further discussion.

1.5 Public Participation

A maximum of 60 minutes is set aside for public participation at the commencement of any meeting of the Council or committee that is open to the public. Under Standing Order 3.23.3 a written, oral or electronic application to address the meeting setting forth the subject, is required to be lodged with the Chief Executive by 12.00 noon of the working day prior to the meeting concerned, and subsequently approved by the Chairperson.

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Requests for public participation can be sent by email to public.participation@wcc.govt.nz, by post to Democracy Services, Wellington City Council, PO Box 2199, Wellington, or by phone at 04 803 8334, giving the requester's name, phone number and the issue to be raised.

2. General Business

OUTER GREEN BELT MANAGEMENT PLAN ORAL HEARINGS 17 APRIL 2019

Purpose

1. The purpose of this report is to provide a list of submitters who will be attending and speaking at oral hearings on 17 April and their submissions.

Recommendation

That the Outer Green Belt Management Plan Hearing Subcommittee:

1. Receive the information.
2. Hear the oral submitters and thank all submitters.

Background

2. Wellington City Council consulted on their Draft Outer Green Belt Management Plan between 23 January 2019 and 25 March 2019.
3. After consultation, every submitter was provided the option to speak to their submission either in the oral forum or oral hearing format.
4. Those who indicated that they wished to speak at oral hearings will be scheduled on 17 April. A separate agenda will be produced for submitters who wish to speak at oral forums on 16 April.

Discussion

5. Attachment 1 is a list of the confirmed submitters who have indicated they wish to speak to the subcommittee in the oral hearing format on the draft Outer Green Belt Management Plan.

Options

6. Not applicable.

Next Actions

7. Following oral forums and oral hearings, the Subcommittee will consider information received on the Outer Green Belt Management Plan and make recommendations to the plan.

Attachments

Attachment 1. List of Oral Hearing Submitters [!\[\]\(179f167ede0522ebb4ea025b3ad78ca7_img.jpg\)](#) 

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Author	Esther Hoskin, Democracy Advisor
Authoriser	Hayley Evans, Director, Strategy and Governance (Acting)

SUPPORTING INFORMATION

Engagement and Consultation

This report provides for a key stage of the consultation process – oral forums.

Treaty of Waitangi considerations

N/A

Financial implications

There are no financial implications arising from this report. Submitters may raise matters that have financial implications.

Policy and legislative implications

There are no policy implications arising from this report. Submitters may raise matters that have policy implications.

Risks / legal

NA

Climate Change impact and considerations

NA

Communications Plan

NA

Health and Safety Impact considered

NA

OUTER GREEN BELT MANAGEMENT PLAN

Oral hearing submissions

Outer Green Belt Management Plan

Oral hearing submissions

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Submission	Name	On behalf of	Suburb	Page
66	Alastair Smith	Individual	Aro Valley	13
186	Andi Cockroft	Akatarawa Recreational Access Committee		20
53	Ant Bradshaw	Individual	Highbury	24
193	Barry Blackett	The Glenside Progressive Association		31
145	Barry Insull	Individual		37
187	Bev Abbott	Ōtari-Wilton's Bush Trust		52
167	Chris Horne	Wellington Botanical Society		61
47	Craig Starnes	Brooklyn Trail Builders	Brooklyn	73
81	Dave Nendick	Welly Tracks Mountain Bike Group		89
183	Doug Calhoun	Individual		96
115	Gary Beecroft	Individual		105
188	Gary Beecroft	Friend of Tawa Bush	Tawa	134
222	Gary Beecroft	Tawa Rugby Football Club	Tawa	168
191	Georgia Vaughan	Individual		180
189	Grant Purdie	The New Zealand Four Wheel Drive Association		182
196	Guy Holmes	Individual		185
194	Iain Fesit	Makara Peak Supporters		189

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128	James Wallace			203
96	John Baddiley	Wellington Mountain Bike Club		211
197	Katy Everett	Individual		224
151	Lynn Cadenhead	Environmental Reference Group		227
61	Martin McCrudden	Mana Cycle Group	Tawa	235
185	Mike Britton	Forest and Bird		247
163	Neil Blackie	Cross Country Vehicle Club		275
170	Pamela Olver	Individual		285
159	Paul Ward	Capital Kiwi		291
121	Russell Pierce	Ōtari Farm Partnership	Karori	295
184	Sally Mann	Individual		302
175	Sasha Calhoun	Versailles Street Residents Group	Karori	305
178	Simon Johnson	Individual		344
153	Stephen Watson	Long Gully Station Trust		348
171	Tim and Katie Christie	Individuals		351
90	Tom Adams	Western Suburbs Trail Alliance	Northland	372
173	Viv Chapple	Individual		391
172	Wayne Pincott	Individual	Tawa	395

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First Name:	Last Name: *
<input type="text" value="Alastair"/>	<input type="text" value="Smith"/>
Organisation: <input type="text"/>	
On behalf of: <input type="text"/>	
Postal Address: <input type="text" value="Type in your address: Eg. 100 Queen St, 1 Willis St"/>	
Suburb: <input type="text" value="Aro Valley"/>	
City: <input type="text" value="Wellington"/>	
Country: <input type="text" value="New Zealand"/>	
PostCode: <input type="text" value="6021"/>	
eMail: * <input type="text" value="REDACTED"/>	
Preferred method of contact	
<input checked="" type="radio"/> Email	<input type="radio"/> Postal
Daytime Phone: <input type="text" value="REDACTED"/>	
Mobile: <input type="text" value="REDACTED"/>	
Would you like to present your submission in person at a hearing?	
<input checked="" type="radio"/> Yes	
<input type="radio"/> I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.	
Additional requirements for hearing: <div><div></div></div>	

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1. Do you agree that the Vision statement on the front of the [Summary Document](#) or in [Part 2 of the draft plan \(starts page 12\)](#) captures what is special about the Outer Green Belt Reserves?

- ☒ Yes
☐ No
☐ Don't know

If not, why not?

2. Looking at the [Summary Document](#) section 'What is the Outer Green Belt?' or at [Part 2.3 \(starts page 13\)](#) and [Part 3 \(starts page 16\)](#) of the draft plan, do you agree with:

	Yes	No	Don't know
The Guiding Principles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Key Values	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Looking at the plan highlights in the [Summary Document](#), do you think these will help achieve the Vision that *the Outer Green Belt...*

	Yes	No	Don't know
is Wellington's wild green connector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
visibly defines the edge of the city	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects and connects nature	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
invites people to escape and explore	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Why/why not?

New entry points with information/interpretation will help raise the profile

4. Looking at [Parts 3.6 \(starts page 30\)](#), [3.7 \(starts page 31\)](#) and [4.6 \(starts page 65\)](#) of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

- ☐ Yes
☒ No
☐ Don't know

What do you think could be added?

Electric assist bikes (e-bikes) have become a popular way for people, particularly those older and less able, to experience biking in the outdoors. Currently e-bikes are permitted on most of the tracks in the Outer Green Belt that are open to non-powered bikes. This seems to have created little if any conflict, and now it would be appropriate to allow e-bikes on all trails that are open to non-powered bikes, including those in new sections of the Skyline such as between Old Coach Road and Spicers. Lightweight mobility scooters (an example is the TravelScoot) which can be carried to

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track entrances by car or public transport, are a way for less able users to explore the Outer Green Belt. While these do not require tracks that meet full wheelchair access standards, in building and maintaining tracks consideration could be given to making them more accessible to mobility scooters. These include: minimising camber and gradients, avoiding steps, avoiding deep loose gravel, and keeping track width to a minimum of 1m. Doing this will benefit other track users as well.

5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years (refer to part 4.5 of the draft plan - starts page 52). Do you agree that this should be the main priority?

- ☒ Yes
- ☐ No
- ☐ Don't know

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again (refer to Part 4.5.2.3 - starts page 54). Click here for maps showing the proposed track networks.

6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

	Yes	No	Don't know
Sector 1	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 2	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 3	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 4	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 5	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 6	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 7	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan that would allow for greater accessibility to the Outer Green Belt by a wide range of people.

Is there anything missing that would help?

Zig-zags!

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The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less
- Areas of regenerating native bush won't get damaged

Cons

- Areas won't look as rural
- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other means to maintain the existing character and views
- People won't be able to see farm animals

8. Do you support the draft plan proposal to phase out grazing animals?

- ☒ Yes
☐ No
☐ Don't know

Why/why not? What ideas do you have to balance out the pros and cons?

This seems to have been very successful on Auckland's Maungawhau/Mt Eden. The summit is more pleasant without cattle, and the grass that has been planted seems to be self managing.

9. The draft plan proposes that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones ([refer to the map of the entrances on page 60 of the draft plan](#)). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

	Yes	No	Don't know
Do you support this proposal?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you think it will encourage more people to use the Outer Green Belt reserves?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please rank the proposed new entrances in order you think we should complete them. The new entrances are planned for the Brooklyn wind turbine; Wrights Hill; Chartwell Bush/woolshed; 268 Ohariu Valley Road or McLintock Street; and Ohariu Valley Road or Upper Stebbings Valley.

McLintock Street could be a good start, being relatively accessible by public transport and close to the skyline track Chartwell Bush/woolshed looks like a good place for an information centre, but is a bit of a hike to skyline track itself. Don't have a firm view on the other potential entrances

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

- ☒ Yes

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- ☐ No
☐ Don't know

Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also considering the management of all of the areas as a connected whole.

The Summary Document lists the key actions for each sector (shown on the Map Page), sector descriptions.

11. **Sector 1 (Te Ngahere-o-Tawa/Redwood)** is the northernmost part of the Outer Green Belt, extending from the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

12. **Sector 2 (Ohariu Ridge)** runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

13. **Sector 3 (Kaukau)** extends from Old Coach Road above Johnsonville to the Chartwell Spur above Crofton Downs. It is also the backdrop to Broadmeadows, Khandallah and Ngaio.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

14. **Sector 4 (Chartwell/Karori Park)** extends from Chartwell Spur above Crofton Downs through to the Makara Road along Te Wharangi ridge via the Kilmister Tops and Johnston Hill above Karori.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

15. **Sector 5 is Makara Peak.** This sector includes the mountain bike park.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

16. **Sector 6 (Wrights Hill/Zealandia)** extends from South Karori Road, across Wrights Hill and the valley of Zealandia.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

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Please add here anything relevant to this sector that you think is not covered in the plan.

17. [Sector 7 \(Te Kopahou\)](#) extends from Zealandia along the main ridgeline, taking in the Brooklyn wind turbine, Hawkins Hill and Te Kopahou before descending all the way down to the South Coast.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

18. Do you have any comments on the [proposed reserve classifications in the draft plan](#)? Please provide the name and/or legal description of the reserve and your comments.

19. Please add here any other comments or suggestions you have in regard to the Outer Green Belt Management Plan.

Look forward to seeing a joined up Skyline Track from Porirua to the south coast

Attached Documents

File
Outer Green Belt Management Plan 2019

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ARAC Executive

The Executive Committee of Akatarawa Recreational Access Committee Inc.



Council of Outdoor Recreation Associations of New Zealand Inc
 [REDACTED] Wellington



Public Access New
 Zealand Inc.
 [REDACTED]
 Dunedin 9054
 New Zealand

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Submission to the Draft Outer Green Belt Management Plan 2019

To help simplify Council's review of submissions, this submission is made on behalf of three organisations all holding similar views:-

- Akatarawa Recreational Access Committee (ARAC)
- Council of Outdoor Recreational Associations of New Zealand (CORANZ)
- Public Access New Zealand (PANZ)

ARAC is a Wellington-based Registered Charity representing some 3,500 recreational users from many disparate sporting codes. Membership includes walkers, horse riders, mountain bikers, Trail Bike riders and 4WD drivers. ARAC has had a long interest in the Wellington South Coast.

CORANZ is a national body composed of National Organisations to form a body representative of the whole. Membership includes fisher folk (both fresh water and sea), hunters, deer stalkers and motorised recreation. Affiliated and Membership of representative users exceeds 100,000 persons

PANZ is a non-registered charitable trust. Management is vested in a board of trustees from throughout New Zealand, all with strong commitments to furthering the interests of outdoor recreationists.

- PANZ bases its advocacy on research, clear objectives, and a determination that comes from first-hand knowledge and love of the outdoors. We collaborate with kindred organisations who share our concerns.
- PANZ advocates rights of access for all forms of public recreation.
- PANZ is tackling issues central to the concerns of recreationists throughout New Zealand.

This submission is concerned solely with the legal road running from Owhiro Bay through to Oteranga Bay which appears upon cursory inspection to bear the name Owhiro Bay Parade. Whether a road be formed or unformed, nonetheless it has the same legal status with the public's right to pass and repass unhindered.

For well over 40 years, we are aware of the closure of the gate at Owhiro Bay on Sundays. Different periods have been tried over the years, but currently this is from around 9am to 6pm. None of our Member Organisations have opposed this which although technically illegal, appears to be a pragmatic solution and has worked well for a very long time.

However, the consultation document contains several options for consideration that go way beyond this simple one day closure. These are likely to see opposition and we would draw your attention to the Decision of the Environment Court of 9th April 2003, Decision No. W21/2003 between Upper Hutt City Council and one of our submitters

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ARAC (available at <http://arac.org.nz/index.php/assets/Downloads/decision.pdf>).

Here the need for Public Access to the unformed road was recognised as paramount and is now enshrined in New Zealand Common Law.

We would go further and argue that the proposal to extend the Outer Green Belt to the high water mark would place the road within the Outer Green Belt and the possibility of future more zealous Council Officers attempting to somehow treat the road as part of a reserve. The road belongs under the purview of the Roding Manager and nowhere else. Its legal classification will remain Road Reserve until (or when) it is changed by public consultation – currently in terms of Section 342 of the Local Government Act 1974.

Therefore we must oppose the extension of the Green Belt to include the road.

We are aware of occasional conflicts along the start of the road as far as Devils Gate, and also illicit activities of a minor element involving usually unregistered and unwarranted dirt bikes and quads ploughing up vegetation.

However, that is a matter for the constabulary to deal with, not Council. Poaching is an additional matter for MPI to deal with.

Similar motorised problems abounded in Horowhenua along Foxton Beach. Strict policing and enforcement of both vehicle registrations and a Council imposed 30kph speed limit has made the area far more enjoyable for all concerned. Perhaps WCC could look for closer liaison with Police and perhaps creating a similar speed limit along the road.

It would also be prudent for Council to engage in meaningful dialogue with all users (including commercial operators and bach owners) in a round table to discuss possible mutually beneficial solutions rather than a broad-brush approach through this plan which already has many complex issues to be resolved.

It should be noted that even walkers create problems at times, staying in the centre of the road and refusing to move as a vehicle approaches. This has been observed many times, and those with loud music blaring in their ears are totally oblivious of traffic.

Separating pedestrians, cyclists and motor vehicles by distance would be good, however we understand the discussion document dismissing this as impractical. Nonetheless, there may be part of the road where this could work and it should be reviewed if possible.

Some of our Member Organisation have a long voluntary working relationship with WCC. Notably Cross Country Vehicle Club have been involved in beach clean-ups and planting programmes. CCVC have always invited other organisation to participate and support has been enthusiastic. Such arrangements are to be encouraged and could even be expanded to the many other recreational groups using the area.

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Should the option be available, we wish to make further oral submissions. We would only require one speaking slot for all three organisations represented here.

For and on behalf of:
ARAC, CORANZ, PANZ



Andi Cockcroft

████████████████████
Brooklyn
Wellington 6021

██████████

andic@andic.co.nz

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First Name:	Last Name: *
<input type="text" value="Ant"/>	<input type="text" value="Bradshaw"/>
Organisation:	
<input type="text" value="none"/>	
On behalf of:	
<input type="text"/>	
Postal Address:	
<input type="text" value=""/>	
Suburb:	
<input type="text" value="Highbury"/>	
City:	
<input type="text" value="Wellington"/>	
Country:	
<input type="text" value="New Zealand"/>	
PostCode:	
<input type="text" value="6012"/>	
eMail: *	
<input type="text" value=""/>	
Preferred method of contact	
<input checked="" type="radio"/> Email	<input type="radio"/> Postal
Daytime Phone:	
<input type="text" value=""/>	
Mobile:	
<input type="text" value=""/>	
Would you like to present your submission in person at a hearing?	
<input checked="" type="radio"/> Yes	
<input type="radio"/> I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.	
Additional requirements for hearing:	
<input type="text"/>	

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1. Do you agree that the Vision statement on the front of the [Summary Document](#) or in [Part 2 of the draft plan \(starts page 12\)](#) captures what is special about the Outer Green Belt Reserves?

- ☐ Yes
☒ No
☐ Don't know

If not, why not?

The Outer Green Belt is Wellington's wild green connector: - it visibly defines the urban edge, protects and connects nature, and invites people to escape the city and explore. It should be saying 'allows' people rather than 'invites' in my view. So that the planning focuses on people actually using the area.

2. Looking at the [Summary Document](#) section 'What is the Outer Green Belt?' or at [Part 2.3 \(starts page 13\)](#) and [Part 3 \(starts page 16\)](#) of the draft plan, do you agree with:

	Yes	No	Don't know
The Guiding Principles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Key Values	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

3. Looking at the plan highlights in the [Summary Document](#), do you think these will help achieve the Vision that *the Outer Green Belt*...

	Yes	No	Don't know
is Wellington's wild green connector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
visibly defines the edge of the city	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects and connects nature	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
invites people to escape and explore	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Why/why not?

More focus needs to be given to enabling people to access the Outer Green Belt. As I say above the word invite needs to be changed to enable. For the vast majority of Wellington City residents access to Sector 7 is extremely limited and there needs to be more focus on this. Sector 7 is the sector that comes closest to the city yet has the most limited access.

4. Looking at [Parts 3.6 \(starts page 30\)](#), [3.7 \(starts page 31\)](#) and [4.6 \(starts page 65\)](#) of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

- ☒ Yes
☐ No
☐ Don't know

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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What do you think could be added?

Recreational and economic benefit provided from an accessible track network.

5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years (refer to part 4.5 of the draft plan - starts page 52). Do you agree that this should be the main priority?

- ☐ Yes
☒ No
☐ Don't know

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again (refer to Part 4.5.2.3 - starts page 54). [Click here for maps showing the proposed track networks.](#)

6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

	Yes	No	Don't know
Sector 1	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 2	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 3	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 4	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 5	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 6	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 7	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

Sector 7 has no well graded trails that are car free. Ability to access hill tops is up very steep tracks Tip Track for example. A better graded network would encourage people to use the outdoors more.

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan that would allow for greater accessibility to the Outer Green Belt by a wide range of people.

Is there anything missing that would help?

A Trail from the Windmill to the bottom of the TNT landfill entrance off Ohiro Road A trail in the Spooky Gully catchment A trail to the Submarine lookout above Red Rocks

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The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less
- Areas of regenerating native bush won't get damaged

Cons

- Areas won't look as rural
- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other means to maintain the existing character and views
- People won't be able to see farm animals

8. Do you support the draft plan proposal to phase out grazing animals?

- ☒ Yes
☐ No
☐ Don't know

Why/why not? What ideas do you have to balance out the pros and cons?

Farming looks so marginal and the animals ruin the tracks.

9. The draft plan proposes that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones ([refer to the map of the entrances on page 60 of the draft plan](#)). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

	Yes	No	Don't know
Do you support this proposal?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you think it will encourage more people to use the Outer Green Belt reserves?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please rank the proposed new entrances in order you think we should complete them. The new entrances are planned for the Brooklyn wind turbine; Wrights Hill; Chartwell Bush/woolshed; 268 Ohariu Valley Road or McLintock Street; and Ohariu Valley Road or Upper Stebbings Valley.

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

- ☒ Yes
☐ No
☐ Don't know

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also considering the management of all of the areas as a connected whole.

The Summary Document lists the key actions for each sector (shown on the Map Page), sector descriptions.

11. **Sector 1 (Te Ngahere-o-Tawa/Redwood)** is the northernmost part of the Outer Green Belt, extending from the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

12. **Sector 2 (Ohariu Ridge)** runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

13. **Sector 3 (Kaukau)** extends from Old Coach Road above Johnsonville to the Chartwell Spur above Crofton Downs. It is also the backdrop to Broadmeadows, Khandallah and Ngaio.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Please add here anything relevant to this sector that you think is not covered in the plan.

14. **Sector 4 (Chartwell/Karori Park)** extends from Chartwell Spur above Crofton Downs through to the Makara Road along Te Wharangi ridge via the Kilmister Tops and Johnston Hill above Karori.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

15. **Sector 5 is Makara Peak.** This sector includes the mountain bike park.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

16. **Sector 6 (Wrights Hill/Zealandia)** extends from South Karori Road, across Wrights Hill and the valley of Zealandia.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

Consult34 Page 6 of 7

17. [Sector 7 \(Te Kopahou\)](#) extends from Zealandia along the main ridgeline, taking in the Brooklyn wind turbine, Hawkins Hill and Te Kopahou before descending all the way down to the South Coast.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

Please refer to Brooklyn Trail Builders submission on this sector I fully support it.

18. Do you have any comments on the [proposed reserve classifications in the draft plan](#)? Please provide the name and/or legal description of the reserve and your comments.

19. Please add here any other comments or suggestions you have in regard to the Outer Green Belt Management Plan.

Attached Documents

File
Outer Green Belt Management Plan 2019

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Draft Outer Green Belt - Management Plan 2019

Submission by the Glenside Progressive Association

Name: Barry Blackett

email: [REDACTED]

Phone: [REDACTED]

Submission: On behalf of The Glenside Progressive Association.

Summary

The Outer Green Belt (OGB) is a great asset to the City. We support the proposed Management Plan and the protection, opportunities and facilities that it offers but see development of the OGB as a continuous long term venture and do not wish to see Council's full resources put into this project alone for the foreseeable future.

More work is needed in Sector 2 which is the weakest link in the OGB at the moment and this is where Council's focus needs to be. We suggest some alternatives should this not be possible.

We want Council to continue to provide and develop reserves, planting projects and walking tracks in reserves close to where most people live.

We would like to make an oral submission to the Council:

Yes

1. Do you agree that the Vision statement on the front of the Summary Document or in Part 2 of the draft plan captures what is special about the Outer Green Belt Reserves?

Yes

2. Looking at the Summary Document section 'What is the Outer Green Belt?' or at Part 2.3 and Part 3 of the draft plan, do you agree with:

- the Guiding Principles: **Yes**
- the Key Values: **Yes**

3. Looking at the plan highlights in the Summary Document, do you think these will help achieve the Vision that the Outer Green Belt:

1. is Wellington's wild green connector : **Yes**
2. visibly defines the edge of the city :

The OGB defines the Western edge of the City but other reserves: Belmont and Horikiwi are also important in that they contribute to defining the Eastern edge.

3. protects and connects nature : **Yes**
4. invites people to escape and explore : **Yes**

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4. Looking at Parts 3.6, 3.7 and 4.6 of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

No but see comments on Sector 2 at end of our submission.

5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years (refer to part 4.5 of the draft plan). Do you agree that this should be the main priority?

No

Council rightly places some emphasis on completing track linkages. Local communities may place less emphasis on this and more on using available resources to build the best tracks possible in their locality, ie from where people live to accessible lookout points.

The linkage from the Old Coach Road saddle point to Ohariu Valley Road is not especially attractive due to the amount of housing and Transpower pylons close by but is readily accessible. On balance, we support this linkage.

However, we don't agree that completing such linkages should be the main priority for the next 10 years. We would like to see progress on other linkages as well (eg see Footnote on p3).

If Council now regard sections such as this as a vital linkages, adjacent development (eg along McLintock Road) should have been discouraged. To prevent this happening in future, Council must plan well ahead to discourage or prevent inappropriate development close to potential link tracks.

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again (refer to Part 4.5.2.3). Click here for maps showing the proposed track networks. 6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

Sector 1: **Yes**

Sector 2: **No**

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

There is a lack of loop tracks proposed for Sector 2 that link with the OGB.

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan

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that would allow for greater accessibility to the Outer Green Belt by a wide range of people. Is there anything missing that would help?

The steepness of access to the OGB is its main difficulty. It is a wonderful asset for fit people with some spare time but most of it is inaccessible to people with a disability or who are less fit.

Possible Solutions:

- **More secondary access points from high level roads.**
- **More information about ease of access from each access point, eg heights and walking times to vantage points.**
- **Better access to Reserves in local communities to compensate for lack of accessibility to Outer Green Belt (See Footnote)**
- **We don't have an opinion about possible gondola access to the OGB tops at this point but would consult widely with our community if this type of access was to be proposed.**

8. The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less
- Areas of regenerating native bush won't get damaged

Cons

- Areas won't look as rural
- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other means to maintain the existing character and views
- People won't be able to see farm animals

Do you support the draft plan proposal to phase out grazing animals?

Don't know

Footnote

A project that the GPA would like to see acted upon in the near future is a link between Glenside Reserve and Seton Nossiter Park via a pedestrian tunnel beneath the motorway. This would provide easy walking access through to Stebbings Valley via Stebbings Walkway as an east-west link. Stronger east west linkages such as this would make the OGB or reserves on route more accessible to suburbs such as Newlands and Paparangi, and Seton Nossiter Reserves more accessible to north western suburbs such as Churton Park and Glenside.

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What ideas do you have to balance out the pros and cons?

Would it be possible to allow animals eg sheep onto grassed areas for a limited time each year for weed control and the reduction of fire risk?

Accessibility for horse riders needs to be more visible in the Northern Suburbs. Will Council be consulting with horse riders separately? It's unclear in this document.

9. The draft plan proposes that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones (refer to the map of the entrances on page 60 of the draft plan). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

Do you support this proposal?

Don't know

Do you think it will encourage more people to use the Outer Green Belt reserves?

Yes. They would be a great asset but the cost is quite high. Council would need to be assured of sufficient usage before embarking on these entrances.

We note that most existing entrances are at low altitude and sometimes some distance away from the Green Belt. Some serve special or multiple uses.

Our preferred options for the northern sectors are as follows (bold):

- **268 Ohariu Valley Road (Totara Ridge) or McLintock Street**
- **944 Ohariu Valley Road (Airstrip Block) or Upper Stebbings Valley.**

However, these locations may not warrant the expense of main entrances. Instead, we suggest that secondary entrances are signposted more clearly and potential secondary entrances such as the above are identified and protected from being blocked by residential development.

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

We see the development of the OGB as being a steady continuous process over time and a lot has been achieved already. This Plan helps define and shape the direction it should take in the future but needs more work to get it right in the Northern Suburbs.

Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also

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considering the management of all of the areas as a connected whole. The Summary Document lists the key actions and descriptions for each sector (shown on the Map Page).

11. Sector 1 (Te Ngahere-o-Tawa/Redwood) is the northernmost part of the Outer Green Belt, extending from the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

Yes

Does the draft plan support community partnership in this sector?

Yes

Does the draft plan support use of this sector by a wide range of people?

Don't know

Will the plan ensure the natural environment continues to be protected and improved in this sector?

Yes

Do you agree with the actions for this sector?

Yes

Please add here anything relevant to this sector that you think is not covered in the plan.

We would like Council to keep open the possibility of direct back road access from Upper Stebbings Valley to Porirua. This could make some use of existing forest roads in the Spicer Forest area.

12. Sector 2 (Ohariu Ridge) runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

No

Does the draft plan support community partnership in this sector?

Don't know

Does the draft plan support use of this sector by a wide range of people?

No

Will the plan ensure the natural environment continues to be protected and improved in this sector?

No

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Do you agree with the actions for this sector?

Don't know

Please add here anything relevant to this sector that you think is not covered in the plan.

The *Sector Overview* indicates that Council has limited ability to make this sector accessible and to develop it adequately. The *6.2 Sector 2 Management Plan* is a thoughtful document that describes in more detail the difficulties, the possibilities and what has already been achieved. We can only encourage Council to keep trying and make a few comments and suggestions as follows:

- Would the landowner be amenable to track access through a narrow fenced corridor along the ridgeline on a lease type basis?
- We see Marshall Ridge as providing the opportunities that the 2km part of Ohariu Ridge not owned by Council cannot offer at present and also see it as lower in altitude and closer to housing, and therefore more accessible. It is also more diverse in character. We strongly recommend that resources and effort be put into Marshall Ridge in the meantime.
- We have reservations about planting these areas with natives based on the survivability of native seedlings except in very moist, sheltered environments. There have been four serious droughts since we began planting under the *Glenside Road / Glenside Restoration Group* umbrella in 2011. We have kept our plants alive by watering weekly during these droughts and taking other measures such as the use of retainers. We recommend Council undertake surveys of recent planting by their own teams and contractors used by developers, and work out a robust survivability protocol before proceeding down this road.

For example, we understand that 17 000 plants were planted in lower Stebbings Valley in 2017 but only a fraction of these have survived. It would be useful for Council to assess actual survivability rates by percentages and species type in this and like situations.

Another potential example is the southern end of Marshall Ridge that was cut to make way for the Westchester Link Road. Initially, Council offered to plant the earthworks cut in natives but later withdrew the offer based on the opinion of an expert environmental consultant who advised that a nurse crop (gorse) would be necessary to ensure survivability of the plants.

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Submission on Draft Outer Green Belt Management Plan
January 2019

Perhaps one of the easier tasks in society is to criticise the written works or comments of another. The converse is that for most it's damned hard to create starting dialogue in whatever form.

While the following notes may appear harsh at times the intent is to highlight what I perceive as errors or omissions in the Draft Outer Green Belt Management Plan.

No comments should be taken as a personal criticism.

These observations are varied in nature, pose questions and in some cases lecture. Hopefully they will assist in the preparation of a final document.

I wish you well with your task.

Here we go:

Page 6
Map of the Outer Green Belt Reserves

One-time retailer Alan Martin coined the phrase "it's the little things that count"
Just a few pages into the plan officers let themselves down. The base map, appears to show the boundary of what was the old Sinclair Head Recreation Reserve and Red Rocks Recreational Reserve. Those two were amalgamated almost nine years ago. Yes I know it's trivial but as a statutory plan there is an expectation that it will be accurate in all facets.

If on the other hand the lines represent individual parcels of land each under separate title one is left to question why this overlay has been used? The primary purpose of this map is to show broad boundaries or the shape of the Outer Green Belt.

Page 13
Guiding Principles

While it is nice, to talk about natural skylines, connectivity, landscape character etc. I suggest there is something lacking - that being the "statutory requirements". Not one of the five headings addresses the legislative provisions of the Reserves Act. Surely guiding principles should be taken from the legislation.

Page 23
3.4.1 Maori settlement

Paragraph two in part reads "Identified sites of significance to mana whenua within the Outer Green Belt include karaka grove settlements" Could I suggest this should be karaka groves associated with settlements.
Perhaps you could identify the primary species identified as "animals" that were utilized as a food resource.

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Page 27

3.5.1 What People do.....

Given that the plan should extend south to the high tide mark why was 4WD/diving not included among the 15 forms of recreation? As a matter of interest where in the Town Belt is the rock climbing undertaken?

Page 33

Map of Wellington's Carbon Forests

The legend at the foot of the page includes "OGB Reserve". The outer green belt is not a "reserve", but rather a management zone comprising a number of reserves of different classifications along with land Council choose to manage as if it were a reserve.

Page 34

4.1.1 Land Administration – Objectives

The first bullet point reads **"To administer and manage the Outer Green Belt reserves in a manner that reflects their reserve status or proposed purpose....."**

On paper such a goal is commendable. Equally importantly it is in keeping with Council's own Wellington Heritage Policy 2010- Objective 4 "To ensure the best practice in heritage conservation is followed by Council staff, heritage practitioners, owners and occupiers of heritage buildings and archaeological sites, and to minimise the loss of heritage values".

Now let's look at reality. It has been nine years since Council sought (and received) the approval of the Minister of Conservation to re-classify the then Sinclair Head Recreation Reserve and the adjoining Red Rocks Recreation Reserve to Historic Reserve. As a key player and lobbyist along with Ngati Toa, Wellington Tenants, then New Zealand Historic Places Trust and others, we were expecting improved or more specific management with the Historic designation. With hindsight what a silly thought. Try searching Council's web site, nothing. signage promoting the Historic Reserve-nothing, printed material-nothing, development/implementation of conservation plans-nothing.

Using the Red Rocks/ Pariwhero Historic Reserve as an example Council have in my opinion not been a good statutory manager of lands designated Historic Reserve under the Reserves Act 1977 the very act being used to advance the Outer Green Belt vision.

Page 34

4.1.2.1 (2)

Submitters are potentially being asked to endorse a classification as scenic reserve without understanding the range of statutory possibilities. The discussion document should have included appropriate extracts from the Reserves Act. While I have no objection to the proposed status it is the process I wonder about. If public debate has already occurred clarity could have been provided by making reference to it.

Page 38

Explanation

Comment here includes "Restoring indigenous vegetation cover to the headwater land will improve water quality and habitat for freshwater species" The statement begs the question would exotic

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vegetation in the headwaters achieve an equivalent or similar result down- stream. Clarity would seem necessary.

Page 40
Map

If the Outer Green Belt extends to the coast (as mentioned in Preface) why is the area between Hape stream (Spooky Creek) and just beyond Sinclair Head not shown as OGB?

Page 43
4.2.2.6

My recollection is that the South Coast Management Plan made it clear fires were NOT PERMITTED. If one was to be consistent then this plan should also include a precise statement. As it stands this section offers no clear direction.

Under the Explanation it is claimed the frequency of fires has decreased in recent years, largely because of regenerating indigenous vegetation supplanting flammable gorse. Can you please confirm data is available to substantiate the claim? What method was used to rule out a decline in firebug activity?

Page 47
4.3.2.3

Here, there is a belief staged harvest of selected blocks will maximise timber value. What blocks are involved and what harvest strategies are contemplated to achieve the stated goal? A further point of consideration is would "staged harvest" increase, decrease or have no impact on roading and other fixed costs. Recent media items attribute improved prices exceeding \$12 /JASm3 to rising prices in China and India, and falling ocean freight costs. The domestic market for logs had a very stable start to 2019 with no significant changes in log prices. Are you absolutely sure a staged harvest of relatively small forests will really maximise timber value?

Page 50
Objectives 1 & 2

I suggest Council has fallen short on these goals with respect to the Red Rocks/ Pariwhero Historic Reserve. See comments under 4.1.1 – Land Administration-Objectives.

A further personal observation demonstrating lack of commitment/ recognition stems back to the early 2000's if not earlier. Council were to list the historic baches in the District Plan. Despite the passage of nearly two decades nothing has eventuated. Explanations over the years have ranged from "appears the listing was overlooked" to comments such as "the matter was outside of the current review". Does Council intend to honour the inclusion of the baches in the District plan and if not why so?

Action point (a) is to develop and maintain an inventory of all sites and features of cultural and heritage interest or value within the Outer Green Belt. Given much of the land has been under Council administration for decades why has this not previously been done? Perhaps the plan should include reason why this is only now being picked up.

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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Page 53

4.5.2.2

Motorised Vehicles

As a general premise I support the vision for “Managed” use of motorised vehicles within Council reserves. That said existing wording appears extremely heavy handed. My plea is to reword making allowances for a range of requests subject to reasonable constraints.

The following wording raises a number of issues “A significant change in this Plan is the proposal to extend the Outer Green Belt to the South Coast, which means the unpaved road around the coast from Te Kopahou Visitor Centre is now part of the Outer Green Belt”.

The obvious question is – Would the unpaved road (an unformed part of Owhiro Bay Parade) indeed be part of the Outer Green Belt as you would have the public believe or is the unformed road “bounded” by the Outer Green Belt. The answer to this question is I believe quite significant. I agree with the statement that careful management of access along the road is required.

I suggest if you were to look at your permitting documentation carefully you will find only one 4wd club has been granted access permits. It is incorrect to say clubs. To provide a little background, the use of Te Kopahou by the Cross Country Vehicle Club is in part recognition of the “public good” the club provides to Council and the wider community. Dare I say it most recreational users are just out for themselves and generally put little if anything back into this area.

It concerns me that the Draft Plan includes “Commercial motorised vehicle tours on the Outer Green Belt will not be permitted.” Such wording could impede future tourism opportunities. As an example a quality operator wishes to drive visitors to a distant point within Te Kopahou to view Kiwi at night. No attempt has been made to explain the reasoning. More importantly given Owhiro Bay Parade between the Te Kopahou Visitor Centre and a few hundred metres past Sinclair Head would be part of the Outer Green Belt (and Commercial motorised vehicle tours are not permitted) what then of operators like Seal Coast Tours who have operated for a number of years?

Page 58

Map

Legend refers to OGB Reserve

See earlier comments.

Page 61

4.5.2.4

Item 6

Why limit time/distance info to just major tracks?

Reference is made to “codes of behaviour” elsewhere I though the term was “rules” What are they and can I please be provided copies of those published to date?

Page 62

4.5.2.5

Dog Walking

Like several areas in this plan there is a void around breach of conditions.

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Seeing dogs running off leash in the vicinity of Red Rock/ Sinclair Head is very common. Given it is classified as an on leash area there would seem a requirement to educate dog owners and undertake enforcement action should there be repeat offenders.

As silly as it may be, I am highlighting the fact that if you impose conditions (which in most cases are justified) then you have an obligation to enforce them.

Both ground nesting birds (e.g. penguin/ banded dotterel) and invertebrates are potentially at risk from unrestrained dogs.

Page 72
4.4.3.1

It is hard to believe a long established local authority with statutory responsibilities still needs to develop an inventory of sites and features of cultural and heritage interest or value within what is effectively reserve land.

Page 77
5.3.1

Text of concern here reads “freedom camping of only self-contained campervans in the designated area at Te Kopahou coastal entrance up to a maximum of four nights in any calendar month”
For clarity of this policy I suggest you need to set out the reasons why it is only available to self - contained campers. Clearly the presence of town water supply and public toilets is insufficient through the eyes of Council to permit non self -contained campers. The NZ Government web site addressing freedom camping includes “use public toilets if you don’t have a self -contained vehicle”

Page 78
5.3.1.1

The introductory paragraph reads “In order to protect the **park**” (emphasis added).
The use of the word “park” is assumed to be a genuine error.

Page 84
5.3.3.1

(3) The following activities are specifically prohibited:

“Open fires other than permitted under the Wellington Consolidated Bylaw”

As I read the Bylaw it seems to focus on nuisance and safety. There appears, NO provisions to uplift permits to light fires or light a type /class of fire in the absence of formal authority (e.g. hangi/umu)

Turning now to the Fire and Emergency Act and the agency’s policies it appears that in the case of Red Rocks you need:

- A FENZ permit (required during both an open and restricted fire season), and
- You need to have obtained permission from the landowner or occupier-WCC.

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When I phoned Council's Call Centre to make enquiries about fires at Red Rocks it was suggested I contact FENZ. Internal guidelines may need to be checked.

Given rainfall data suggests February is Wellington's driest month and we are currently in a "restricted fire season" it is surprising there has been no signage prohibiting or warning of fire dangers at or near the Te Kopahou Visitor Centre.

Page 158

Sector 5 Makara Peak

As an observation I note much of the text focuses on the mountain bike park and perhaps that is appropriate when discussing biking activities. Why is there no discussion about management of the area in respect to its primary land designation –Scenic Reserve? Without being picky what could be lack of internal policy to call things what they are appears to have created confusion. The high point (412 mtrs) has been named by the NZ Geographic Board (Nga Pou Taunaha O Aotearoa) as **Makara Hill** which is also the name used in the draft plan under 6.5.2, Thus one would have expected the Scenic Reserve to be named Makara Hill SR. The NZ Gazette shows Makara Hill. Confusion occurs when reference is made to an entry in the NZ Gazette by Kevin Lavery, Councils Chief Executive. In relation to at least one parcel of land the reserve name has been shown as Makara **Peak**. Perhaps text here needs to clearly set out the correct name of the reserve and purpose of its designation. Frankly as it stands it appears to be a lump of land with a primary use of mountain biking. Would a designation of Recreation Reserve have been more appropriate for this area? Should Council be working towards re-designation?

Given the public have "freedom of entry and access" to Scenic Reserves I suggest it is appropriate the plan includes expanded text to explain why it is intended to close the reserve for an activity which is not the primary purpose for which the land has been so designated. Page164, item 8, states amongst other things "**6 days full park closure** per year.....(emphasis added).

Page 185

Key features/values

It is inaccurate to make reference to a Red Rocks Seal colony. The haul-out site is at Sinclair Head the next headland approximately 1 kilometre further around the coast. Although folk talk about Red Rocks and seals this is not to suggest they are one.

Local community volunteer activities

This year's Cross Country Vehicle Clubs beach clean –up (scheduled for November) will be its 19th consecutive year, far exceeding restoration planting, track building and predator control. Bias, or lack of knowledge?

Page 186

Paragraph 1

You are reminded that the Red Rocks Historic Reserve, is not part of **Te Kopahou Reserve** which Council propose to designate Scenic Reserve.

As for the argument "....so that all the ecologically significant Te Kopahou reserve land will be covered by this management plan" I would comment that the portion within the Historic Reserve is

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already protected, and has been subject to the provisions of the Reserves Act for many years. Refer to section 18(2) of the Act.

Page 186

6.7.1.1

Land status

I wish to voice my strong objection to the statement “.....together with several classified scenic, historic and local purpose reserves adjacent to the coast, is known as Te Kopahou Reserve”. This is a Council promoted descriptive that lacks statutory recognition. The Red Rocks Historic Reserve has a unique status (even if poorly managed) that deserves to be recognised in its own right, something Council have failed to do to date. While it may be part of a “landscape zone” it is NOT through the eyes of many or in a legislative context part of the Te Kopahou Reserve – a yet to be gazetted area that is primarily to recognise scenic values. The intent of Council, to call it what it is not makes a mockery of Section 16 of the Reserves Act 1977. Management of the Historic Reserve to date has been nothing to crow about, then again, nothing has been done in nine years. Had Parliament contemplated grouping lands of different status or themes together then calling it some form of “reserve” over and above other classifications then the statute would have been structured in such a way as to openly accommodate the vision. As currently worded there is NO provision.

Given this draft is essentially a discussion document it is disappointing to read “The Reserve area comes within the scope of the South Coast Management Plan 2002 (SCMP). A minor review of that plan will be required to remove the reserve from its scope”. I suggest that Council have formed an opinion or outcome in the absence of fair and reasonable consultation. Again my concern is process not necessarily end result.

6.7.1.1

2nd to last paragraph

What is a “suburban reserve”? I note the classification has neither been used nor interpretation advanced in the Reserves Act.

Page 187

Shore platform

What are you trying to say here, two recent earthquakes added to the uplift or the earth quakes of 1848 and 1851 formed the coastal platform that did not exist prior to 1848?

Page 188

Speargrass weevil

A point of clarity, has the threat to the weevil caused by pigs and goats diminished to any degree as a consequence of pest control measures? The document records that “goat and pig numbers have been suppressed”.

Under “Issues” negativity is directed towards adjacent private land owners. This is perhaps in poor taste. I am aware of at least one landowner who for some considerable time has been commenting on Darwin’s Barberry coming from “over the fence” making reference to Council administered lands.

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Allegations have been made of trampling and browsing by feral pigs, goats and deer in recent years. My understanding is that numbers are limited. Can the “trampling” be quantified and put in perspective against other threats?

Page 188
Tracks

While new tracks can, in some circumstance aid management this is not to say they are essential. Routes created for pest control are often generally of crude nature and without significant (if any) ground disturbance.

Page 189
First paragraph

“Much of the area has come under possum control in the last 12 months”. Elsewhere comment has been “In 2017 possum control was expanded to the open tops of Te Kopahou” (emphasis added). Which one is correct?

Further down the page readers are told “weed control is targeted to protect species (e.g. dracophyllum) or high value sites”. What is the the average annual expenditure to protect dracophyllum?

Page 189
Owhiro Bay Quarry

To add balance it needs to be recorded there are also other unstable and disturbed sites. Is reference to climate change really necessary? If it must stay what is anticipated over the life of this plan?

I suggest the term “revegetate or revegetation” is more appropriate than “restoration” You can mimic or replace but you cannot restore in the true sense of the word

Page 190
2nd paragraph

The correct spelling of the range on the far side of the harbour is Remutaka.

Part of the 3rd paragraph needs expansion if the public are to understand what is intended. Please explain why the planting outcomes need to be reviewed?

Recent plantings beyond Red Rocks, have got nothing to do with the quarry operations.

Page 190
6.7.1.4
Places of historic value

Consideration should be given in this document to clearly define the status of Karaka. At one point we are told its presence has historic/cultural value yet elsewhere it is described as weed and by inference should be removed.

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If the Hape stream dam is indeed of **historic** value as you suggest, did Council consult with NZ Historic Places Trust (now Heritage NZ) prior to its partial destruction some years back? Council is reminded of its obligation to **manage and protect** historic features within Scenic Reserves. The vision of allowing the dam to deteriorate over time could be in conflict with the legislation.

It is disappointing the plan suggests little is known of the origins of Te Hape dam. Gary Tonks provided a brief history in his 2008 publication. Seems a 1934 letter from WCC also refers to its existence. My recollection is that Tonks addressed Council as part of the South Coast Management Plan consultative process. This is just one of two "historic" dams that I am aware of on the South Coast.

Without being disrespectful I suggest it is rubbish to claim "Excellent interpretation about mainly the coastal area is presented in displays at the visitors centre" The place is becoming shabby and many aspects of the presented material shows bias and contains inaccuracies. One panel addressing roads reads "They take over the narrow strip where life adapted for salt, shingle, seepages and sand once thrived. There is nowhere else for those specially adapted plants and insects to live." Although such emotive statement may be correct it is hard to believe this is balanced text endorsed by Council. I guess such comments could apply to the tens of kilometres of road around the Wellington coastline. Farming and extractive use (quarrying) were legitimate activities in their day yet reference is found under the panel "Demolition Gangs" or words to that effect. The inaccuracies were drawn to Councils attention soon after the centre opened. Not one of the many errors has been corrected over the years.

Page 191
Issues and opportunities
Owhiro Bay Quarry

While I agree with you instability issues exist at the former quarry, there are other sites also. **It is a blatant mistruth to say risk is in part managed by "barriers to contain rock fall". Silly statements like this deserve sharp criticism- they also undermine the good work elsewhere in the document.**

The risk from falling rocks, exist over much of the coastline from Owhiro Bay through to Makara. While some increased risk can be attributed to Quarry operations both the landscape and nature plays a significant part.

Page 191
Coastal road

I agree there are issues associated with the road. Resolution is not simple and a change of attitude by many seems required. Looking at the text within the draft I make the following points;

Contrary to the writers suggestion the coastal road does not stop at Karori Stream. It continues to a point just east of Oteranga Bay some kilometres distant. The error suggests a lack of knowledge by officers.

I whole heartedly agree users (all recreationalists) have an obligation to act responsibly – and that needs to include walkers being more conscious of vehicles when they choose to walk on what I call the driveable surface (road). You do not walk down Willis Street in the middle of the road. The various users are not necessarily incompatible. It is manners/ respect that seems to be missing. I would welcome the opportunity to work with officers to enhance the experience of the various users.

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Vehicle damage to vulnerable coastal ecology has likely diminished over the years. Where within the scope of this plan i.e. the Outer Green Belt do you believe it (damage) is still occurring? If practical I will ask colleagues within the Cross Country Vehicle Club to give consideration as to how this (damage) could be mitigated. For balance you need to recognise that it is not only vehicles (defined as motorised and non-motorised i.e. mountain bikers) that have the potential to disturb wildlife. Walkers getting too close to seals or dogs running at large have the same effect.

Part of this section includes "The user conflicts were reduced some years ago by closing the road to vehicles on Sundays but still remain". Closure in one form or another commenced before most, if not all current Parks, Gardens and Recreation staff started with Council. Papers that I have seen suggest motorised restrictions have existed since the mid 1970's.

Efforts to separate foot and motorised activity is worthy of close examination. There are several points where this could be achieved one example would be the "rehabilitated" zone between Fly Rock and the first lot of baches. Opportunities exist for both raised scenic viewing and picnicking. Native plantings are occurring thanks to a partnership between WCC and the Cross Country Vehicle Club. Although limited in length it would never the less be a useful start. The suggestion additional tracking could damage natural character and vulnerable shore ecology might be a little over the top, don't forget much of the platform has been heavily modified in the past.

I am interested in the concept being promoted that vehicle closure times to public holidays and night time will be explored. While I personally have no problems with the later it is the public holiday bit that I would question. To have reached such a position one would assume user data is available. My suspicion is that walkers reach their highest numbers during the winter period when the seals are at Sinclair Head and that has nothing to do with public holidays. Could I please have a copy of any usage data that has been collected to support public holiday closure?

The plan tells readers that there will be increased enforcement of the shared use rules. The obvious questions are what are shared use rules? I could not find them on the Council web site. A second question is how many hours were allocated to enforcement of the rules in the past 12 months? My third question is what powers do the enforcers (whoever they may be) have in respect to legal roads?

The risks of rock fall, remains irrespective of user group or paper status of the land. The way it has been used here could show a little bias.

The final sentence of the 2nd to last paragraph introduces doubt over maintenance of the road due to "climate change" What aspects of climate change- sea level rise of greater than say 150 mm, would such changes occur during the life of this plan?

Page 191
Tracks and access

Reference to "discover a hidden valley" is in my view a little dramatic for this type of document. It is after all a statutory planning document and not a kid's adventure story.

Page 192
Community

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Here we are told Public education days, organised jointly by the Department of Conservation, Ministry of Primary Industries and Council have set a constructive precedent, which could be further developed to promote understanding and appreciation of the areas heritage and highly significant land-based biodiversity values. My questions are how many of these education days have occurred and what date was the last? Ranger Thomas supported by myself and at one point police have attempted to educate motorised vehicle users over a number of years, yet this has not been recorded, why so?

Page 193

Indigenous flora and planting.

It puzzles me why item (7) is even in this document. Surely those within Council with appropriate responsibilities will be closely monitoring compliance of any consenting conditions. In respect to the T & T landfill we were told on page 186 that it was NOT proposed to include this land in the Outer Green Belt reserves so why include it here?

Page 194

Item 12

Any reason why deer and other wild animals have been omitted?

Page 194

Item 14

As worded the intent is to exclude “feral” animals. What about domestic stock?

Page 194

Item 18

The obvious question here is why should ratepayer’s money be used?

I note the initial survey was conducted by DOC an agency with appropriate statutory responsibilities.

Page 194

Item 20

Where can one find the policy that limits 4wd vehicles to the formed coastal road? You are reminded that any new photographic shots should be limited to only those points within the OGB.

Page 195

6.7.2.4

A serious question that I would appreciate a written answer to.

The Red Rocks/Pariwhero Historic Reserve was established approximately 9 years ago (October 2010).

Section 18 of the Reserves Act states that in relation to reserves classified as historic reserves they shall be for the purpose of **protecting and preserving in perpetuity** (emphasis added to this quote) such places, objects, and natural features, and such things thereon or therein contained as are historic, archaeological, cultural, educational, and other special interest. There is a requirement that lands declared historic reserve shall be so administered and maintained that-

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(a) the structures, objects and sites illustrate with integrity the history of New Zealand

Can Council put hand on heart and say it has been a good statutory manager given my previous comments: signage-nothing, printed material-nothing, development of conservation plans-nothing, hell even a search of Councils own web site turns up nothing. The criteria for being a good manager must surely include how it communicates with the public.

Page 196

6.7.2.5

Item 1

The concept of encouraging visitors by way of onsite, brochure and digital information, to keep to tracks to avoid damaging the fragile ecology in Te Kopahou is being promoted as a NEW initiative. I for one am aware of Council handouts printed in past years that promote this very message.

Key words of the period included:

- Protect plants and animals
- Keep to the track
- Toitu te whenua – (leave the land undisturbed)

Brochures conveying a similar message have also been handed out to drivers of 4wd vehicles as part of the driver education days over a number of years.

Is this really a NEW initiative or enthusiasm to bring the past into the modern era?

Page 196

6.7.2.5

Item 4

In respect to the Hawkins Hill access road it would seem some clarity over rights of administration are required. Over its length the land tenure on the sides differ. Nothing has been sighted in this document to define the "owner"

If there were some shared ownership can the views of one (Council) over-ride the opinion of another should there be disagreement. It is possible that Council's promotion of this area has had, or could have, an adverse effect on others who rely on the access road. Should the plan describe Councils vision of long term use/ visitor numbers, how many is too many?

Page 196

6.7.2.5

Item 5

There is reference here to an increase in park ranger and volunteer warden patrols.....and enforce speed limits. Questions arise around delegations of the ranger for one and the other point is who are the wardens and what statutory powers do they hold. Just what is the speed limit, is it enforceable under bylaw and enforced by whom? When and how was it set?

Page 196

6.7.2.5

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Item 6

As an observation I suspect Council currently lack key data, and when or if challenged would have to admit they have not seriously dealt with the conflict issue well to date. Driver education days have been few and far between (I should know I have been at every one), little to no attempt to separate users and no willingness to discourage walking on the drivable surface. There is a high probability that if poorly handled resolution will be through Court judgement.

Page 196

6.7.2.5

Item 7

Given verbal undertakings have been made in the past that summer/winter hours of closure would form part of the SCMP review why was it not included here? Its absence undermines trust.

Page 197

Item 9

The statement requires clarity. If you are trying to say construct alternate tracks to enhance the experience of walkers say so. Folk who use motorised transport either for management or emergency purposes generally have appropriate driver expertise and a suitable vehicle for off road activities. Are you able to list any current examples?

Page 197

Item 10

Clarity as to why culverts will not be used should have been set out in the document. While I am sure well intended it could have adverse impacts on future management.

Page 197

Item 12

This should not be too difficult. Council already own land, with a gravelled car park and toilets just a few hundred metres away.

Page 197

Item 13

A long distance track is shown as a NEW initiative. Is this really the case, both officers and Councillors have spoken of this vision for quite some time.

Page 197

6.7.2.6

Surely a long established tourism operator would have been a better example e.g. Seal Tours. Zip Line could be 12 months away or more before their first paying customer.

Page 198

Map

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What are each of the Maori sites of significance, can they be identified by either the WCC site coding system or better still that used by Heritage NZ? Depending on the interpretation of "significant" I suggest there is a higher number.

Pages 203 -205

Land unit 7.1.9 (map) is shown as Scenic Reserve on page 205. That is incorrect. Nine years ago part was gazetted Red Rocks Historic Reserve: the one Council appears to have forgotten about. Why has land unit 7.1.11 not been shown on the map?

And that ends this submission.

In summary, I thought the document was a little too long, and contained excessive errors / omissions. Lack of knowledge by writers showed up at several points and there were hints of bias. While containing fancy wording enabling opportunities it was shallow in fact setting out items I would have liked to have seen in respect to the general management and protection of features within the Red Rocks/Pariwhero Historic Reserve. I also make the observation that the draft plan also fails to reasonably signal or explore intended or desirable actions, an example being the proposal to install a walk bridge over Waipapa stream in the coming months. It is possible its presence will lessen the semi remote experience of this area. I certainly do not recall any request for submissions. It would not have been my highest priority for expenditure.

Might I suggest that should it be found significant changes to this draft are warranted as a consequence of submissions you give consideration to the release of a further document upon which fresh comment could be sought.

Before I forget, unless I overlooked something there was no discussion around "Capital Kiwi" either as a vision or the increased predator control required to achieve their goal.

I look forward to assisting officers should they seek my input to matters associated with the South Coast and its individual reserves.

Barry Insull

[Redacted]
[Redacted]

Whitby

Email- [Redacted]

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25 March 2019

TO: outergreenbelt@wcc.govt.nz

FROM: Otari-Wilton's Bush Trust, 160 Wilton Rd, Wilton

SUBMISSION ON DRAFT OUTER GREEN BELT MANAGEMENT PLAN

INTRODUCTION

1. The Otari-Wilton's Bush Trust (OWBT) is a public charitable trust made up of people who care deeply about Ōtari's forests, the development of its significant botanical collections, and the innovative conservation research now underway at the Lions Ōtari Plant Conservation Laboratory. About 100 of our 400 members contribute as volunteers to maintenance and visitor services at Ōtari through predator control, weeding, restoration planting, weekend hosting in WCC's visitor centre, and providing guided tours to locals and international visitors.
2. The Otari-Wilton's Bush Trust welcomes this opportunity to comment on the Draft Outer Green Belt Management Plan (the Draft Plan).

ADDITION OF MACRON TO ŌTARI

3. We were surprised to find a macron had been added to the "O" in Ōtari as we did not know this was under consideration. We have no objection to the change but would like to understand the relationship between Council's Open Space Naming Policy, Whakaingao Whenua Mahorahora, (4.4.2.3) and any statutory or regulatory processes associated with formal name changes, e.g. approval by the NZ Geographic Board, approval by the Minister of Conservation.
4. The Trust will need to consider the implications of the macron for its own name, its Trust Deed and for its publications, website etc. We would like some assurance that Council will make the necessary arrangements with search engines such as Google so that international users will still be able to find Ōtari websites even if they are not aware of the need for a macron.
5. Given that the Trust has not yet made a decision about changing its name, this submission uses the macron when referring to Ōtari-Wilton's Bush as a place, but uses the spelling in the Trust Deed for the name of the Trust.

VISION

6. We like the vision, i.e.: *The Outer Green Belt is Wellington's wild green connector – it visibly defines the urban edge, protects and connects nature, and invites people to escape the city and explore.*
7. We recommend Council reinforce the role of the Outer Green Belt in defining the city's urban edge in the District Plan.

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LEGISLATIVE MANDATE AND PURPOSE

8. The Draft Plan acknowledges, (p.7), that it has been prepared under the provisions of the Reserves Act 1977, but the diagram on page 10 shows the starting point as *Wellington towards 2040 – Smart Capital*. (Its date is 2011). Please revise this diagram with the Reserves Act as the starting point to show that the management plan is a statutory document, and not a strategic/non-statutory document.
9. We would expect the final Plan to be more closely aligned with the general purposes of the Reserves Act (s.3) as in the following box.

Reserves Act Section 3

General purpose of this Act

- 1) It is hereby declared that, subject to the control of the Minister, this Act shall be administered in the Department of Conservation for the purpose of:
 - a) providing, for the preservation and management for the benefit and enjoyment of the public, areas of New Zealand possessing:
 - i. recreational use or potential, whether active or passive; or
 - ii. wildlife; or
 - iii. indigenous flora or fauna; or
 - iv. environmental and landscape amenity or interest; or
 - v. natural, scenic, historic, cultural, archaeological, biological, geological, scientific, educational, community, or other special features or value:
 - b) ensuring, as far as possible, the survival of all indigenous species of flora and fauna, both rare and commonplace, in their natural communities and habitats, and the preservation of representative samples of all classes of natural ecosystems and landscape which in the aggregate originally gave New Zealand its own recognisable character:
 - c) ensuring, as far as possible, the preservation of access for the public to and along the sea coast, its bays and inlets and offshore islands, lakeshores, and riverbanks, and fostering and promoting the preservation of the natural character of the coastal environment and of the margins of lakes and rivers and the protection of them from unnecessary subdivision and development.

10. We were puzzled by the second Purpose of the Draft Plan, i.e. “to promote shared recognition of the Outer Green Belt’s importance to Wellington”. This promotion could be undertaken without delivering any benefits to the OGB or its flora, fauna, natural communities, habitats, landscapes or visitors.
11. We were puzzled by the third Purpose, i.e. “to promote co-operation between the Council, neighbours, stakeholders and the community in regard to managing the Outer Green Belt”. There are many different communities in Wellington with differing interests in, and aspirations for the Outer Green Belt. We question whether producing a management plan of over 220 pages will promote co-operation between these different communities. How does Council intend to “promote co-operation?”
12. We recommend re-writing these two purposes as objectives and including them in Part 4.6 (Community and Identity). They are not appropriate as purposes of a statutory management plan under the Reserves Act.

NATURE

13. This Draft Plan is the first management plan to be prepared since the release in 2015 of the *Our Natural Capital*, Council's biodiversity strategy and action plan. We had expected the Draft Plan to be aligned more closely with *Our Natural Capital*. We found it difficult to get a sense of how Council intends to implement its biodiversity strategy and action plan on the Outer Green Belt. How do the many sections in the draft nature section of the Draft Plan fit together to "protect and connect nature"? What are the priorities? How will you know if you have been successful?
14. We liked the way that Section 4.2. (Nature) started by defining and constraining the purpose of this section. It says: "The focus in this section is on nature for nature's sake – its intrinsic value, protection and enhancement, and the opportunity for connectivity due to the long shape and large scale of the OGB. Other sections cover what this means for user experience, landscape values, wellbeing etc."
15. But almost immediately, the three objectives in 4.2.1 introduce wider purposes including enhancing mauri, exercising kaitiakitanga, retaining open grassland for recreation and landscape purposes, and contributing to the city's resilience through ecosystem services. We think Objective 4.2.1 (1) and the first part of 4.2.2(2) may provide sufficient coverage for a section on nature for nature's sake.
16. Officers have crafted forty-two policies and actions to provide a "consistent policy, management and decision-making framework for WCC's OGB reserves"¹). These are set out under 8 themes, (caring for nature, streams, wildlife, indigenous flora and planting, weeds and pest animals, fire, ecological values on private land, and resilience-ecosystem services). Given the intent to focus on nature for nature's sake, a structure drawn from *Our Natural Capital* may provide more clarity about what Council intends to implement its biodiversity strategy on the Outer Green Belt. We suggest basing the structure on "protect", "restore" and "research", i.e. three of the four strategic themes in *Our Natural Capital*.
17. The seven management sectors introduce more nature-related actions. Descriptive text also refers to a restoration planting strategy and programme on p.39, and city-wide biosecurity management on p.41. When will these documents be available on Council's website?

WEEDS 4.2.2.5

18. Council appears to have pre-determined its investment in weed control for the 10-year term of OGB Management Plan, saying on p.42. "Since 2005, weed and pest animal control in the OGB has been prioritised in areas of high ecological management. However, available resources limit the extent of weed control that can be carried out". There does not appear to be any limit on the funding that can be allocated to controlling carnivores, herbivores and omnivores.
19. The Draft Plan (4.2.2.1) signals that Council will review weed management programmes on the OGB and identify gaps in habitat type or species protection. We strongly support this proposed review as the latest weed management plan was released in June 2005. Please ensure that the results of the review will be available so funding for implementation can be considered as part

¹ From 1.1.2, the purpose of the Management Plan.

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of public consultation in the next review of the LTP. Weed control is fundamental to protecting and connecting nature (indigenous ecosystems) on the OGB.

20. We expect Council to ensure sufficient operational funding is available to achieve observable improvements in the health of “nature” (indigenous ecosystems) on the Outer Green Belt over the next 10 years.
21. Text in 1.1.7, p.11 suggests the public has the opportunity every three years as part of the LTP consultation to provide submissions on the proposed programmes of work. The structure of the LTP consultation in 2018 linked Resilience and the Environment, and sought public reaction to specified proposals, including waste water, storm water, and security of water supply. Projects for enhancing predator control through trapping and funding for Predator Free Wellington were proposed, but there was no suggestion of even small increases in funding for the control of weeds, herbivores and other predators. How does Council intend to modify its LTP consultation processes to make it possible for Wellingtonians to express their support for increased funding for weed control?
22. Appendix 6 in *Our Natural Capital* lists 83 pest plants in the city. On the Outer Green Belt, some weeds will be more problematic than others (environmental weeds). More complete data are available about weeds at Ōtari. The Ōtari Bioblitz in March 2007 identified 153 adventive vascular plants (weeds) in the natural areas. It’s likely there are now more as increasing bird numbers since 2007 will have been bringing in more weed seeds.
23. The Trust is concerned about the threat posed to the Ōtari ecosystems by the lack of weed control in the Karori Cemetery. Weeds such as Darwin’s barberry, tradescantia, old man’s beard, ivy, blackberry and convolvulus continue to proliferate with no apparent attempts being made to control their spread.
24. We were reassured by the description of the prioritisation process for weed control on p.42, e.g., prioritising control of Darwin’s barberry in Te Kopahau where its distribution is still limited. It was, however, disheartening to read that Darwin’s barberry is now so widespread on the ridgetops of Wrights Hill and Te Wharangi ridge, that “control is not possible at this time”. How does Council propose to limit the spread of Darwin’s barberry by birds from these areas into other parts of the OGB and city, including private land?
25. We were pleased to see that WCC and GWRC will investigate increased boneseed control on the coastal escarpment in Te Kopahau. GW has produced impressive statistics about the effectiveness of its aerial boneseed control programme.

MYRTLE RUST

26. Myrtle rust has reached Wellington, and the OGB’s position in the path of westerly winds from Australia means further invasions from across the Tasman are likely. The Draft Plan does not explain Council’s role in managing the myrtle rust threat.

THE RELATIONSHIP BETWEEN THE DRAFT PLAN AND THE MANAGEMENT PLAN FOR OTARI-WILTON’S BUSH

27. We are very concerned about policy 4.1.2.3 (1) on page 36 which says:

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“When any policy in this Plan is in conflict with a policy in another overlapping management, conservation or master plan, then the most recent policy will take precedence and provide guidance for the next review of the older plan(s).”

28. We have always regarded the Wellington Botanic Gardens Management Plan 2014 (WBGMP) as the overarching planning document for Ōtari. We don't think the OGB Plan should be able to trump the WBGMP in decision-making about Ōtari.
29. Policy 4.3.2.1 (6) in the Draft Plan illustrates our concern. It says “provide for exotic tree species to be planted where appropriate for amenity, recreation and wildlife habitat purposes”. BGWMP (page 57) says “*OWB is the only botanic garden in New Zealand dedicated solely to native plants...*”. We cannot anticipate any situations where it would be appropriate to plant exotic trees in Ōtari-Wilton's Bush. We ask that the policy for planting exotic trees includes a specific exemption for Ōtari-Wilton's Bush.
30. There is no information about the types of exotic trees that officers may regard as appropriate to add to Outer Green Belt land for amenity, recreation and wildlife habitat purposes. And if exotic trees, why not exotic shrubs and ground covers?
31. The words “where appropriate” are not sufficiently reassuring when we recall that *Banksia integrifolia* (a potentially weedy Australian native) was planted in Zealandia to provide food for its expanding bird populations. (Fortunately the banksias were removed before banksia seeds started invading new sites).
32. We wonder why Council has not signaled its intent to investigate and pursue opportunities to obtain funding from central Government's *One Billion Trees Programme* to plant more indigenous trees and shrubs throughout the OGB. Many of the benefits associated with this programme are compatible with Council's vision for the OGB.
33. We also noted an apparent conflict between Policy 4.3.2.1 and the assessment criteria on page 2 of the undated Wellington City Council's *Guidelines for Community Gardens* which states that “*Community gardens are not appropriate in Coastal Management Areas, or in Wellington's Outer Green Belt.*” This indicates that neither fruit trees nor nut trees, not even a lemon tree, could be grown in a community garden on the OGB, but that trees with colourful autumn foliage, or trees that flower in spring may be appropriate for their amenity values.

TRACKS

34. Another reason for concern about policy 4.1.2.3 is the series of policy shifts made by Council in recent years to allow mountain-bikes on more of Wellington's walking tracks. Special provisions in the *Open Spaces Access Plan* 2016 retain Ōtari walker-only status, but we fear under policies 4.1.2.3 and 4.5.2.3 (3), shared foot and bike-based use could soon become the standard policy.
35. The closer that authorised mountain-bike use gets to Ōtari, the more tempting it must be for mountain-bikers to make exploratory side-tours into Ōtari. New downhill tracks and easier gradients come with high risks of destruction of vegetation and erosion, often followed by calls for more infrastructure and services to make it easier for cyclists to reach the starting points for one-way, downhill tracks.

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36. We had hoped that Council's commitment to the 10-year Master Plan for Makara Peak Mountain Bike Park (2017) would satisfy the wants of mountain-bikers for a decade or two, but the Draft Plan includes at least two proposals that may result in increased mountain-bike activity near Ōtari. We oppose both of these proposals:

- three new Grade 5 downhill mountain bike tracks in the pine plantation above Karori Cemetery (6.4.3.5. p. 143)
- (continue to) develop well-graded side tracks to bypass very steep sections of existing tracks, especially the 4WD sections of the Skyline Track (4.5.3.3).

37. We are also concerned about recent reports that some tracks within Ōtari have already been opened to mountain bikes as a result of decisions made after consultation on the Open Spaces Action Plan (2016). We urge Council to produce clearer maps for Sector 4, that show the boundaries of Ōtari in relation to the Skyline Track, Johnston Hill and Karori Cemetery.

38. We ask Council to take a more determined approach to enforcing compliance with the "no mountain-bike" provisions of the WBGMP, for example:

- early implementation of additional signage as in bullet points 8 and 9 of 6.4.3.5
- introducing occasional enforcement checks – sufficient time has lapsed to allow for education/voluntary compliance to work if it were going to.
- observations using hidden cameras or drones to identify people involved in unauthorised track construction activity.

39. We recommend deleting the words "being steep and narrow" from bullet point 9, as these qualities are not the only reason for the closure of Ōtari tracks to mountain bikes. The tracks in Ōtari are among the few tracks in Wellington where walkers can, in theory, walk without having to be ever-ready to get out of the ways of mountain-bikers. "Steep and narrow" could tempt more mountain-bikers to explore tracks in Ōtari.

40. We offer provisional support for a walking-only track to connect the Chartwell Bush area to Ōtari-Wilton's Bush (6.4.3.5.2b). Our reservation comes from a rule in 5.3.1, p.77 which identifies "the movement of horses through management sectors 1 and 2 and at Chartwell." We don't want horses venturing into Ōtari, introducing more weed seeds in their droppings.

DOGS

41. Most dog-walkers in the gardens at Ōtari keep their dogs on leashes, or can pull out a leash if reminded of the rule, but on Ōtari forest tracks, non-compliance by some dog-walkers with the "dogs must be on leashes" provisions of the WBGMP is an on-going issue.

42. More fenced dog-exercise areas are needed. Different messaging may also be effective, e.g.:

- dogs can be poisoned by eating karaka fruit and possum bait
- dogs can be injured in collisions with mountain-bikes

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- Wellington's chances of gaining permission to release kiwi into the wild near the city may be reduced if the numbers of unleashed dogs seen on the OGB and in parts of Ōtari is not reduced to zero.

FIRES

43. Section 4.2.2.6 lists four ways of managing fire risk followed by just five lines of explanation that note that there will always be risk of fires from lightning strikes and people causing inadvertent or deliberate fires. The frequency and severity of fires caused by lightning is likely to increase with climate change.
44. We would like the final Plan to record more details of Council's preparedness to manage large wild fires in different parts of the OGB, especially if fires are threatening residential and farming properties at the same time. For example:
- Are maps of the OGB readily available at fire stations showing the most practical routes for getting fire trucks into the more isolated areas with limited road access and difficult terrain? Perhaps the big trucks can't get there.
 - Does Wellington have adequate aerial capacity and capability to assist on-the-ground fire-fighters?
 - Are aircraft able to refill tanks from the reservoirs in Zealandia or will they have to go to the harbour or south coast?
 - Have plans been developed for different scenarios, e.g., a large passenger plane crashes into a high ridge, or vandals set fire to abandoned cars, or a gas burner explodes in a freedom camping area?
45. The Plan says that Council proposes to plant fire-resistant species in areas of high fire risk, but gives few details of areas with high fire risk, or the fire-resistant species that will be planted in different habitats. Perhaps this information is in the city-wide restoration planting strategy and programme? We would also like to understand the relationship between this proposal and Policy 4.3.2.1 (6) in the Draft Plan which makes provision for the planting of exotic tree species such as eucalypts.
46. We agree the taller rank grass which is likely to emerge in areas where Council's intention is to stop grazing is likely to be a higher fire risk than shorter grazed pasture grasses.

OUTCOMES FOR OPEN TOPS

47. The objectives in 4.3.1 on Landscape include "to achieve a sustainable balance between maintaining open hill landscapes and restoring indigenous vegetation on the OGB". Maintaining open hill tops is apparently important for recreational and landscape purposes, but we did not find any plans to restore indigenous vegetation on the open tops. Please explain the meaning of a "sustainable balance" in this context. Associated text asked the question "If there is a desire to preserve at least some open ridge tops, how can it best be maintained and at what cost"?

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48. Section 4.3.2.2 (2) anticipates that open tops can be maintained with “mechanical methods and herbicide spraying” There is no information about the range of weeds and weedy native species to be controlled. Are the weeds mainly gorse and Darwin’s barberry, or are low-growing herbs, native shrubs, and grasses also likely to be removed. The planning, fencing and research/monitoring actions in 4.3.2.2 sound expensive, and that’s before the associated labour costs are included (for line-trimmers, back-pack sprays, or larger mechanical mowers and sprayers). We suggest that Council investigate grazing by sheep as an alternative method for maintaining open grassland vegetation on the tops in the longer term. Grazing by sheep may be a more cost-effective method of maintaining relatively natural vegetation and supporting natural regeneration than mechanical or chemical treatments. Grazing doesn’t have to be economically viable; it can be treated as an operational cost. The species that will regenerate naturally will vary with local climatic conditions, the density of the grass, and the proximity of suitable seed sources.

CHARTWELL DRIVE/CHARTWELL BUSH ENTRANCE AREA (p.140) 6.4.2.5.

49. The Draft Plan refers to the potential to provide a pleasant picnic area and entry area with track links to both the Skyline Track on the ridge and OWB. It also notes that more parking than the limited capacity currently at the road end would enable this area to be a main entrance from which people could choose varied activities.

50. From the Trust’s perspective, an additional picnic area may help ease the daytime pressure at Ōtari’s Troup Lawn which is becoming increasingly popular (crowded) at weekends when there are no staff on duty. Additional parking may also help manage any increase in overcrowding in the carparks at Ōtari which may result from new opportunities for longer and multi-day walks and rides through to Makara and beyond. Security of parking will need to be considered as that may be the basis of the appeal of parking at Ōtari.

51. The potential activities identified for Chartwell include basic overnight camping, but there was no description of the level of servicing envisaged. The Department of Conservation has a category called Basic Campsites which provides for basic toilets and water which may be from a tank, stream or lake. Initially this may meet the needs of some of the freedom campers now visiting the city, but demand/use is likely to grow. What are the implications of providing a higher level of service, e.g. flush toilets, cold showers, BBQs, rubbish collection, supervision, or of trying to constrain the type of camping permitted to little tents or self-contained vans?

CONTRIBUTION OF STAFF AT ŌTARI-WILTON’S BUSH TO PLANNING FOR CONSERVATION AND RESTORATION

52. We strongly support the three action statements listed in 6.4.3 about work to be undertaken at Ōtari-Wilton’s Bush:

- Continue to implement and support the Ōtari-Wilton’s Bush section of the Wellington Botanic Gardens Management Plan 2014 (no.2)
- Continue with the research being carried out at Ōtari-Wilton’s Bush Native Botanic Garden to support native plant conservation both in the living collections and in the Lions Ōtari

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Plant Conservation Laboratory. The lab's focus is on long-term seed storage behaviours, seed viability assessment, and seed germination protocols. (no.8)

- Continue to work with OWB to improve the restoration planting programme and the restoration of threatened and rare plants. (no.9)

53. We also support the second part of 6.6.3.2 (5), a research project in Sector 6, (Wright's Hill/Zealandia) which supports the reintroduction of either uncommon or locally extinct plants into the catchment. The fence around Zealandia means palatable plants within the fence are less vulnerable to browsing by herbivores such as possums and rabbits which can re-invade lower sections of the catchment after control programmes.

TE KOPAHAU RESERVE (Management Sector 7)

54. We have some reservations about the intention to include Te Kopahau Reserve (TKR) in the OGBMP. The Draft Plan is already long and contains unfunded projects. TKR is large area (1,124.3 ha) of which 789.7 ha still requires classification under the Reserves Act. TKR contains some of the most significant ecological sites in the Draft Plan, and the protection and enhancement of these values may not get the attention they deserve as part of an omnibus plan.

55. Losing any of the threatened plants in Te Kopahau to weeds, herbivores, omnivores, fire, trampling or unauthorized track work would be a tragedy.

56. We were surprised there was no mention of freedom camping, freedom campers, wildfires or tsunamis on the coastline of Te Kopahau. It's been suggested this may be because the land at the camping site is Road Reserve. Does this make Council its own neighbour? Perhaps Council should be working with itself to deliver Outer Green Belt Management Plan purposes at and near the freedom camping area.

CLASSIFICATIONS AND RECLASSIFICATIONS OF LAND (APPENDIX III)

57. The existing zonings of some parts of the OGB under the Wellington District Plan as residential and outer-residential may mean they are particularly vulnerable to residential developments until the District Plan is reviewed. We would expect Council to apply very rapid timelines to do whatever work is necessary to achieve the classifications and reclassification of the areas listed in Appendix III. The biggest threat to some extensions to Wellington's OGB may be central government which seems intent on taking more reserve land for housing as has been happening recently in Auckland.

SPEAKING AT HEARINGS

58. We would like to speak to our submission at the Hearings.

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25 March 2019

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To whom it may concern

Submission: Draft Outer Green Belt Management Plan 2018

We acknowledge the detailed work which went into the plan. We thank you for the opportunity to comment on it. When hearings are held, we wish to speak in support of our submission.

Rules of the Wellington Botanical Society Incorporated

The objects of the society particularly relevant to the draft management plan are:

- “2(a): To encourage the study of botany, the New Zealand flora in particular;
- 2(b): To create an interest in, and foster an appreciation of, the native plants in the field;
- 2 (c): To collect and disseminate knowledge of, and encourage the cultivation of, native plants;
- 2(d): To advocate the preservation of lands and waters under protected area statutes in their natural state.”

Submission: page 2 onwards.

Submission

The document includes numerous excellent maps and photographs. It covers 234 pages which makes comprehension and comment a massive undertaking.

Recommendation: Ways be found to reduce the length of the document, to make it easier for staff and members of the public to understand and use.

We use the titles and page numbering in the document.

Preface, p 4

We support, in general the changes from the 2004 document, except the reference to selective harvesting forestry plantations.

1. Introduction p 5 - p 11

We welcome the high-lighting of the main gaps in the Outer Green Belt, as shown on the map on p 6.

We support these statements.

Note re p 11: in the box re legislation and regulation, the Reserves Act was passed in 1977, not 1997. The Resource Management Act was passed in 1991. The Biosecurity Act was passed in 1993.

2. Vision, p 12 – p 15

We support the vision, and 2.1 and 2.2.

Recommendation: In 2.3 GUIDING PRINCIPLES, in the penultimate line, replace ‘should’ with ‘will’, otherwise the guiding principles will be ignored when it suits.

3. Description / Key values, p 16 – p 20

3.2.1 PAST ECOSYSTEMS AND LAND USE p 17

Recommendation:

- in line 2, after the words ‘covered in forest’ the words ‘after the end of the last Ice Age’ be added.
- in line 5, after the word ‘wind-sculpted’ the word ‘grey-scrub’ be added. This will familiarise readers with the name of this ecologically significant component of the flora of the city’s south-western hills.

Caption to photographs on p 17: We support the statement that Darwin’s barberry has a role to play in succession towards native plant communities. Please see article in Wellington Botanical Society’s December 2018 newsletter, p 10-11.

Forest remnant map. p 18

We recommend that Dr Geoff Park’s 1999 paper prepared for WCC *An inventory of the surviving traces of the primary forest of Wellington city* be mentioned.

3.2.2 NATURE TODAY p 19 – p 20

On p 19, para 3, line 1, replace the word ‘below’ with ‘on previous page’.

We recommend the addition of a sixth bullet point:

Waipapa Stream and valley, Te Kopahou Reserve (refer management sector 7).

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3.3.3 CONTINUITY AND URBAN EDGE p 21 – p 23

p 23: We support “Further additions to the Outer Green Belt in the northern suburbs”.

3.5.1 WHAT DO PEOPLE DO ON THE OUTER GREEN BELT?

We do not support over-night camping on the Outer Green Belt because of the risk posed by camp fires.

3.5.3 ACCESS AND AMENITIES p 29 – p 30

We believe that the existing network of tracks – former farm roads – in Te Kopahou Reserve, provide excellent access to the reserve. Thus we oppose the construction of new tracks in the reserve.

We support the use of the Northern Walkway by walkers and runners, but oppose its use by cyclists, except where it coincides with the Skyline Walkway.

4.2 Nature p 37 – p 44

4.2.2.3 Indigenous flora and planting p 38 – p 39

1, 2, 3, 4. We support the intention to “Protect threatened or locally significant plant species through weed and pest-animal control”.

We consider **all** native plant species to be significant, unless they do not occur naturally in Wellington Ecological District 39.01, e.g., weedy species such as karo, karaka, lacebark (*Hoheria populnea*).

Sustained weed control and pest-animal control will in time enable the seeds of locally occurring native plant species to be delivered naturally to the Outer Green Belt (OGB) by birds, or the wind, then germinate, thus restoring native species to the OGB with minimal human intervention. Strict control of pest organisms will foster natural regeneration.

We consider that the planting of indigenous species which eventually create a canopy ten or more metres above ground, or which become emergent above such a forest canopy, runs the risk of genetic contamination, because species may vary in genetic composition throughout their range. In addition, bringing plants in planter bags may introduce soil micro-organisms which do not occur naturally at the site of proposed plantings. The resulting elimination of expenditure involved in raising plants can be invested in intense and sustained control of pest animals, pest plants and other ecological weeds.

The *Explanation* at the foot of page 40 is repeated at the top of page 41.

4.2.2.5 Weeds and pest animals p 41 – p 42

Second paragraph, p 42: “However, available resources limit the extent of weed control that can be carried out.” This problem is city-wide, not just on the OGB. WCC’s councillors have failed over decades to fund adequately, the control of invasive introduced plant species.

Illustration p 42: Insert ‘seed weevils’ after the second mention of Darwin’s barberry, and change ‘is’ to ‘are’.

We support intensive and sustained control of all pest animals. We recommend the addition of magpies to the list of pest animals.

4.2.2.6 Fire

We recommend that freedom camping anywhere on the OGB be forbidden. Apparently desirable sites include the former Sky Farm’s paddock off the top of Chartwell Drive, and the South Coast from the end of Owhiro Bay Pde to Rimurapa/Sinclair Head. Out-of-control fires at either of these sites would be ecological disasters, and difficult to fight, especially at the latter site.

4.3 LANDSCAPE AND LAND USE p 45 – p 49

4.3.1 OBJECTIVES. We support.

4.3.2 POLICIES & ACTIONS p 45

4.3.2.1 Landscape character

Points 1-5 – We support.

Point 6 - We oppose. Reasons: Such plantings would be out of character, and pose the threat of the exotic species self-sowing on the OGB. The result of planting *Eucalyptus* species could lead to a reduction in stream flows, because large eucalypts presumably take up large volumes of water per tree.

4.3.2.2 Grazing

1. We support a), b), c), d).

2. We accept mechanical methods of grass control, We accept the use of foliar herbicides, provided the necessary care is taken. Reason: health of people and ecosystem.

Actions: We support actions 1-4.

4.3.2.3 Plantation forestry p 47

First bullet point: We oppose ‘staged harvest of selected blocks’.

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Reason: Understorey native plant species, and their supporting soils and natural landforms would be damaged.

Second bullet point: If a significant understorey of native species is present, we would prefer WCC to let the fallen trees rot.

Reason: this would allow the minerals in them to return over time to the soil in the area, while the fallen trees would provide shelter to the developing native plant community.

Third bullet point: We prefer ‘allowing the exotic trees to age and fall over naturally’.

Reason: Less damage to native understorey and soil structures.

Fourth bullet point: We support.

Final para on p 47: The forest is Te Ngāhere-o-Tawa.

4.4 CULTURE AND HERITAGE p 50 – p 51

We support the objectives and policies.

4.5 RECREATION AND ACCESS p 52 – p 64

4.5.1 Objectives

We support the objectives.

4.5.2 POLICIES

4.5.2.1 Recreation p.52 – p 53

We support the policies.

We would not support allowing camping anywhere on the OGB, whether near the wool shed above Chartwell, in any hut which might be built in any sector, or on the South Coast beach from the Te Kopahou Visitor Centre to Rimurapa/Sinclair Head. The risk of fire, accidental or intentional, is too great.

4.5.2.2 Motorised vehicles p 53 - p 54

We support policies 1, 2, 3, provided that such activities are restricted solely to 4WD vehicles on the existing network of formed roads in Te Kopahou Reserve, including the unformed legal road to Rimurapa/Sinclair Head from the end of Owhiro Bay Parade. Permits for organised outings should be sought from WCC, and the key to the gate at the bottom of the Tip Track should be sought for WCC’s ranger. Motorised trail bikes and quads should not be permitted in Te Kopahou reserve, because of the noise they produce, and the risk they pose to walkers and runners.

4.5.2.3 Track network p 54 – p 57

Points 1, 2 we support.

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Point 3 we do not support. People studying plant communities along the track network are at times at risk from mountain-bike users when they speed past us, and/or pass too close to us.

Points 4 – 9 we accept.

Point 10 we support, in the hope that this will halt the efforts of ‘guerilla track builders’. Their earth-moving efforts, and native plant felling, in the pine block between Ōtari-Wilton’s Bush and Johnston Hill Scenic Reserve are deplorable, as is the DH98/K-Hole track built in Karori Park’s pine forest. (In Wellington’s Town Belt, similar devastation has been caused in Prince of Wales Park, below Truby King Park, and on Te Ahumairangi and on Mt Victoria.)

Point 11 (c): correct typos in two place names.

Action: We consider the bypass of the Northern Walkway built north of Mt Kaukau uncalled for, and destructive of part of the native plant community becoming emergent above the surrounding Darwin’s barberry and gorse.

Planning. p 56

First paragraph: This should include mention of natural values and environmental sustainability as the primary constraints on track building, in addition to reflecting ‘landscape character’ referred to in the last line.

Third paragraph: We agree with the statement “... there has been community concern about the apparent focus on developing mountain-bike tracks.” Our concern is about the widespread development of unauthorised track by mountain bikers, as stated in our comments on Point 10 above. We urge WCC to move swiftly to stop this activity, by whatever means it has under the Reserves Act 1977, and this management plan when it is finalised.

Fourth paragraph: We support this intention, and recommend that it be implemented this year.

Fifth paragraph: We support this intention, and recommend that it be implemented this year. We deplore the ‘building of unplanned and unsanctioned tracks’ because of the damage they cause to natural landforms and native plant communities and their supporting soils.

Impacts of track construction

We note that construction of a track 1-metre-wide and 1 kilometre long requires the clearance of 1,000 m² of vegetation. Tracks are often up to 2 m wide, thus requiring the clearance of 2,000 m² of vegetation on a 1-km-long track. In the case of native plant communities, track construction disturbs the soil profile, surface

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water flows, sub-soil water flows, soil micro-organisms, and damages the roots and associated mycorrhizae of nearby native plants. Track construction facilitates:

- movement of weeds and pest animals into the adjoining indigenous ecosystem;
- ingress by the sun and wind into the ecosystem which may dry out the leaf litter, humus layer and subsoil, potentially disturbing its stability. The wider the track the greater the canopy gap created in the ecosystem;
- reduction in the carbon-sink / carbon-sequestration capacity of the vegetation.

Compatibility of activities. p 56
We support these two paragraphs.

Design and maintenance. p 57
First paragraph. We support this statement.
Second paragraph. We expressed our concern about the construction of bypasses in our response to **4.5.2.3 Track network p 54 – p 57**

Regional trails framework p 57
We consider that the framework poses the risk of making our track network over-run with users, with the possible result that there will be demands for more tracks to be built. This could lead to the loss of more native vegetation, and damage to more natural landforms. We expressed our concern about the construction of bypasses in our response to **4.5.2.3 Track network p 54 – p 57**.

Existing Track Network p. 58
We consider that all the tracks in Johnston Hill Scenic Reserve, and those leading up through Johnsonville Park from the end of Truscott Avenue should be 'Walking Only Tracks'.

Future Track Network Proposals p 59
5, We support this idea because of its botanical interest..
7. We support the idea of a track from Kilmister Tops down to the junction of Makarā Rd and Takarau Gorge Rd. This would follow the line of the historic Māori track which linked Pipitea Pā, Thorndon and Owhariu Bay at Makarā Beach. Reference: *The Great Harbour of Tara*. G Leslie Adkin. Whitcombe and Tombs Ltd. 1959. Map VI (second part) p 124).

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9. We oppose this idea. One of our members has seen the serious damage to natural landforms and some native plant communities caused by unauthorised track construction in the mixed pine/native forest.

10. We oppose this idea, because there are several tracks already linking Karori Park and Makarā Peak Mountain Bike Park. The proposal could result in the clearance of native vegetation.

12. We consider that Te Kopahou Reserve has an excellent network of tracks, so the construction of more tracks, resulting in the inevitable loss of indigenous plant communities, and disturbance of soils on the steep slopes in the reserve, cannot be justified.

4.6 COMMUNITY AND IDENTITY p 65 – p 71
 We support this section.

4.7 IMPLEMENTATION AND MONITORING p 72 – p 75
 We support this section, with the exception of 4.5.3.3 Track network. We expressed our concern earlier in this submission about the construction of bypass tracks. If the section of track to be bypassed is very steep is to be closed, we ask that the closed track be blocked off at both ends so that in time it will be colonised by native or exotic species, the latter to be over-topped by native species.

5 RULES FOR USE AND DEVELOPMENT p 76 – p 88
 We support this section.

WILL DRAFT FOLLOWING SECTION FRIDAY/SATURDAY:

6 MANAGEMENT SECTORS

6.1 SECTOR 1: TE NGAHERE O TAWA / REDWOOD p 89 – p 104

6.1.1 Overview.

6.1.1.1, 6.1.1.2, 6.1.1.3. We support.

6.1.1.4 We are concerned that the felling of pines in Te Ngahere-o-Tawa, regardless of the number to be felled at any one time, would pose risks of damage to the sub-canopy regeneration of native species, to their supporting soils and landforms, and waterways in the forest. We note that the gullies are steep-sided and carry waterways which flow into Te Awa o Porirua Harbour which already contains large volumes of silt from earth-works in its catchment.

Airstrip block forest plantation. We support.

6.1.1.5 We support. We note that high on the true right of Stebbings Valley there may be a gold-pro prospector's adit. (It may be in the Owariu Ridge sector).

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, 6.1.1.6, 6.1.1.7. We support in general.

6.1.2 ACTIONS

6.1.2.1 We support.

6.1.2.2, We support, .subject to WCC obtaining permanent protection of the remnant native forest at the head of Stebbings Valley, - it contains *Syzygium maire*/swamp maire which is rare in the city. Nearby is a rimu, and further down the valley, on the true left were several young tōtara.

6.1.2.3 We may support, subject to recognition of our concerns mentioned in 6.1.1.4 above.

6.1.2.5 We support, subject to WCC noting our concerns about track impacts recorded in bold text on page 7 of this submission..

6.1.2.6 We support,

6.1.2 ACTIONS

6.1.2.1 – 6.1.2.6 We support.

6.2 SECTOR 2: ŌWHARIU RIDGE p 105 – p 116

6.2.1.1 - 6.2.1.6 inclusive. We support.

6.2.2 ACTIONS

6.2.2.1 – 6.2.2.7. We support.

6.3 SECTOR 3: KAUKAU p 117 – p 136

6.3.2.1 – 6.3.2.7. We support.

6.3.3 ACTIONS

6.3.3.1 We support.

6.3.3.2 We support, except paras 5 & 8:

We question the planting of emergent canopy species in any reserve, and in Huntleigh Park, the trial planting of epiphytes. Greater Wellington Regional Council's Western Forests Key Native Ecosystem (KNE) programme maintains an intensive possum and rodent-poisoning regime, supplemented by community pest-control efforts, which ensures that pest-animal populations are kept at low densities. In addition, by-kill of mustelids and hedgehops results from secondary poisoning when these animals eat poisoned dead possums and rodents. Thus species of native plants in these forests have a good chance of having seeds of emergent canopy species, and seeds of epiphytes, spreading in a particular reserve from seed sources within it. Also, birds and the wind may deliver seeds of emergent canopy species and epiphytes from nearby reserves.

6.3.3.3 – 6.3.3.6 We support.

6.4 SECTOR 4: CHARTWELL / KARORI PARK p 137 – p 158

6.4.2.1 – 6.4.2.2 We support.

6.4.2.3 We oppose the statement in the final paragraph “ ... the spurs ... may be suitable for mountain-bike tracks.” Widespread damage to natural

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landforms, and some felling of native plant communities on this land, has been caused by unauthorised construction of mountain-bike tracks. We urge WCC to restore the natural landforms as much as possible, and endeavour to apprehend and prosecute the offenders.

6.4.2.5 We welcome the statement in para 2 that “Tracks in Ōtari-Wilton’s Bush and on Johnston Hill were designated as walking-only under the *Open Space Access Plan 2016*.”

6.4.3.5 – 2 a) We oppose the construction of more tracks in Karori Park’s ‘wild side’, because of the adverse impacts on native vegetation communities, their supporting soils and natural landforms.

6.4.3.5 – 3 a) We oppose the construction of any more mountain-bike tracks in the pine plantation above Karori Cemetery, for the reasons given in our comments on 6.4.2.3 above.

6.4.3.5 4 - 6.4.3.5.4 – 6.4.3.5.13 We support.

6.4.3.6 We support.

6.5 SECTOR 5 MAKARĀ PEAK p 158 – p 170

We note that the construction of ‘More than 35 km of tracks’ will have resulted in the clearance of a strip of vegetation at least 1 m wide. The result was the clearance of at least 3.5 hectares of vegetation, predominantly native. We question whether any more loss of vegetative cover can be justified. We also question whether the substantial expenditure by WCC on the park over many years has been at the expense of adequate maintenance of reserve lands, including the Town Belt, and walkways in other parts of the city.

We note that tracks:

- cause fragmentation of reserves;
- create canopy gaps which facilitate the entry of sun and wind into the interior of the native plant community on either side of the track, thus drying out the soil and affecting the growth of native plants;
- disturb the root structures of native plants along the margins of the track;
- facilitate the entry of pest plants and pest animals into the bush either side of the track;
- provide channels for rain-water, increasing the rate of loss of top soil into waterways.

6.5.2.1 – 6.5.2.6 We support, subject to the comments we made in 6.4 Sector 4 with respect to possible new tracks in Karori Park to link with Makarā Road saddle.

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6.5.3 ACTIONS

6.5.3.1 We support.

6.5.3.2 We support, except for 6.5.3.2.4. We expressed our concerns about the planting of emergent tree species in 6.3.3.2 above.

6.5.3.3 – 6.5.3.6 We support.

6.6 SECTOR 6 WRIGHT HILL / ZEALANDIA

6.6.2.1 – 6.6.2.6 We support.

6.6.3 ACTIONS

6.6.3.1 – 6.6.3.6 We support.

6.7 SECTOR 7 TE KOPAHOU

6.7.1 Master Plan. We accept.

6.7.1.1 Land status.

We welcome the proposal to gazette the entire 'Te Kopahou Reserve', except for the landfill designations, as Scenic Reserve under the provisions of the Reserves Act 1977, down to sea level. This will ensure the permanent protection of the high landscape values and the largely indigenous plant communities and related native wildlife.

6.7.1.2 Nature

We support.

Issues

Fire. We recommend that the coastal platform from the Te Kopahou Visitor Centre to Rimurapa/Sinclair Head be closed to freedom camping. This will help to lower the risk of fire sweeping up the vegetation on the coastal faces resulting from the lighting of camp fires.

Tracks. We consider that Te Kopahou Reserve has a good range of tracks, so that we oppose the construction of more track. As we stated earlier:

Tracks:

- cause fragmentation of reserves;
- create canopy gaps which facilitate the entry of sun and wind into the interior of the native plant community on either side of the track, thus drying out the soil and affecting the growth of native plants;
- disturb the root structures of native plants along the margins of the track;
- facilitate the entry of pest plants and pest animals into the bush either side of the track;
- provide channels for rain-water, increasing the rate of loss of top soil into waterways.

6.7.1.3 – 6.7.1.6 We support.

Recommendation
We urge WCC to seek to obtain all that land on the east side of Hāpe Stream/Spooky Gully which is not in WCC ownership. If in addition WCC could obtain the land on the east side of the ridge between Hāpe Stream/Spooky Gully and lower Happy Valley Road, this would be a valuable addition to the reserve, adding landscape values, and potential ecosystem values to Te Kopahou Reserve.

- 6.7.2 ACTIONS
6.7.2.1 – 6.7.2.5 We support.
6.7.2.5.1 We support.
6.7.2.5.2 and .3 Track network. We oppose the development of new tracks, because we consider that the present network is adequate. Please refer to our comments on the adverse impacts of tracks on the previous page.
6.7.2.5.4 We recommend that for the safety of pedestrians on Hawkins Hill Road south of the wind turbine car park, the gate at the car park be reinstated. The combination on the lock should be known only to WCC staff, Airways Corporation staff, DOC staff, police, first responders’ staff and residents along the road and in Long Gully.
6.7.2.5.5, 6, 7, 8. We support.
6.7.2.5, 9. Note our concerns about the adverse impacts of tracks listed in bullet-point form above.
6.7.2.5, 10 – 15. We support.
6.7.2.6, 1, 2, 3, 4. We support.

.....END.....”

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First Name:

Craig

Last Name: *

Starnes

Organisation:

Brooklyn Trail Builders

On behalf of:

Postal Address:

Type in your address: Eg. 100 Queen St, 1 Willis St

Suburb:

City:

Country:

New Zealand

PostCode:

eMail: *

Preferred method of contact

☒ Email

☐ Postal

Daytime Phone:

Mobile:

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

Consult34 Page 1 of 2

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File
BTB submission on the Outer Green Belt Management Plan - FINAL 7 March 2019
Outer Green Belt Management Plan 2019

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**BTB submission on the Draft Outer Green Belt Management Plan
– 7 March 2019**

Introduction

Thank you for the opportunity to submit on the Draft Outer Green Belt Management Plan.

Brooklyn Trail Builders commend WCC for producing the plan and what it intends to enable for at least the next two decades.

We do note however, that the draft OGBM Plan is a vast document - too big to fully digest and make a meaningful submission beyond the sectors that are of immediate interest to us. The document and its content may be a victim of its own design in terms of some people being put off by its magnitude and not bother with a submission at all.

We fully support the concept of linked and shared trails (continuity and connectivity) between and through all 7 Sectors of the Outer Green Belt – especially the Skyline north to Porirua.

This will create numerous opportunities for a growing Wellington population and changing recreational needs – perhaps even unimagined recreational needs.

Equally, it will enable ecological, cultural and economic (including tourism) benefits.

All this will accrue through an open-minded, aspirational vision for the future development and management of the Outer Green Belt and considered (but not burdensome) consultation.

We are somewhat troubled by the apparent imbalance between the vision of the Council's Open Spaces Access Plan (OSAP) and the Outer Green Belt Management Plan.

The Vision contained in the OSAP is – “Wellington City Council wants to strengthen and improve the open space access network through a plan that will:

- provide outstanding opportunities for recreation and tourism within the open spaces of Wellington
- ensure that tracks provide for a wide range of user interests, skills, abilities and fitness levels within each area

- achieve a quality primary network accessing major destination points in Wellington and adjoining districts, and linking with an equitable distribution of secondary and local track networks and recreational facilities
- provide a network of tracks that enables more residents to enjoy using the city's open space safely, while enhancing the natural environment."

Conversely, the Draft OGBM Plan appears to favour conservation/ecology, at the expense of recreation – despite the Outer Green Belt being defined as...

"Wellington's wild green connector: - it visibly defines the urban edge, protects and connects nature, **and invites people to escape the city and explore.**"

Our concern with the imbalance should not be interpreted as 'anti-conservation/ecology'. Far from it, we endorse the majority of those initiatives. It's just that recreation seems to play a secondary role when, in our view, the two aren't mutually exclusive. They can, and should, co-exist. We point to what's been achieved in Polhill Reserve as a shining example of balanced conservation and recreation.

Recreation and ecological values need to be in equal balance, and our experience in Polhill shows this is very workable.

A practical example of this relates to the new trail currently being built in Polhill Reserve. With this trail under construction, the Polhill Protectors (a volunteer group with whom BTB have a close relationship) have recently built 50+ A200 traps - half of which will be laid out along this new trail. The point here is that new trails enable much better access for people to extend, lay and check the trap network for predator control.

The language of the Draft OGMP paints the establishment of trails in a bad light e.g. producing weed corridors and negatively impacting on the environment/ecology. The few weeds that do grow alongside our trails are easily managed because the trails provide easy access. We have no evidence of trails becoming 'weed corridors'. Also, planting trees with fast growing canopies quickly reduces weeds, while improving the local ecology.

Furthermore, in terms of land area, a new trail network in Sector 7 would account for about 1% of the total land area – but allows significant access to nature.

With our mantra of "Trails, Trees and Traps", and a solid track record in Polhill Reserve, BTB is all about helping the WCC achieve its OSAP vision, and believe what we want to see reflected in the Outer Green Belt Management Plan – and Te Kopahou (Sector 7) in particular - can only enhance this.

There is a certain irony that a dominant and growing feature of Sector 7 are the public and private landfills that assail the senses and detract from what would otherwise be a positive experience in the Te Kopahou Reserve. We address this more fully later in our submission.

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It should also be noted that Brooklyn Trail Builders has already (2017) made a submission on the Te Kopahou Reserves Master Plan - which provides a first-cut for future shared trail development in the area. [Attached as Appendix 1 – see page 8]. This 2017 BTB document has yet to be fully developed into a complete range of trail opportunities, including a rationale for each trail (e.g. grade, linkages, points of interest, etc).

Brooklyn Trail Builders supports the submission made by the Western Trails Alliance (Tom Adams) regarding Sector 4 (Chartwell/Karori Park), particularly the proposed trail development on Johnston Hill.

Brooklyn Trail Builders supports the submission made by the Wellington Mountain Bike Club.

In Sector 6, we support the track network as described in 6.6.3.5 (1) – page 175. BTB is in discussion with private landowners to provide an alternative route into Polhill.

It is pleasing to note that in the document *Wellington Regional Trails For the Future (A Strategic Framework for Trails in the Wellington Region 2017)* that Polhill/Te Kopahou is identified as a Regional Trail. Furthermore, The Skyline Track (Spicer Forest to South Coast) is identified as a Signature Track. (See page 29 of the Draft OGMP).

Regarding the Recreation and Access section of the draft OGMP, Brooklyn Trail Builders notes the points relating to running a community consultation process on any proposed new tracks in Polhill Reserve/Brooklyn Turbine/Te Kopahou Reserve - see 4.5.2.3 (7) on page 54 and 4.5.2.3 (8c) on page 55. We implore that the community consultation process be streamlined as much as possible to avoid the unnecessary over-consultation and time delays that occurred around the process for the new descending trail in Polhill Reserve (currently under construction - after 4 years of initial discussion, consultation and Council finally agreeing to it).

We query whether a mediated meeting with all interested parties might be a faster, more effective way to reach common ground – but are open to other suggestions.

For the purposes of this submission, BTB will focus on Sector 7 – Te Kopahou, as that is the Sector of most interest to us, and where we next want to apply our “Trails, Trees and Traps” approach.

Our submission largely takes the form of commenting on the Actions as outlined from pages 193 to 197 of the Draft Outer Green Belt Management Plan. Where we have no comment, we have jumped past that Action point. Where we believe there should be additional Actions, these are identified as ‘NEW’. Our comments are as follows:

6.7.2.1 Land administration

Land status

1. BTB agrees with this. However, we want it expanded to include the blocks east of Maori Gulley (part of blocks 7.1.3, 7.1.4 and 7.1.5 should also be re-surveyed to scenic reserve).
2. Agree. Confirm there should be a 200m lineal buffer zone beneath Hawkins Hill Road.

NEW = there are two blocks of Council-owned land currently ground leased to T&T. Once the lease expires in 2026 they should be reclassified to scenic reserve. Access rights over these two blocks can be granted to T&T, provided reciprocal access rights are granted over the T&T owned blocks for future trails – see later reference.

Licenses and rights of way

3. Agree, however vehicle speed limits should be reduced to 30kph and/or could be managed with speed humps.

6.7.2.2 Nature

Caring for Nature

1. Agree. Along with continued public access. We believe our trails grant access to experts to help maintain and enhance ecosystems.
2. BTB believes there will be a considerable challenge fencing some parts of the boundary north of the Te Kopahou trig. However, a solution would be to fence near the trail BTB proposes to build or purchase the land below the road.
3. Trails provide access to help ensure habitats are healthy and can be restored – including access ways for new plantings.

Streams

4. Streams provide high visual appeal for people. Any new trails near streams would run at a safe distance from the streams or bridges would traverse them.

Indigenous flora and planting

7. There is too much material being blown over from C&D into Spooky Gully. This is unacceptable. Once the lease expires (for both C&D and T&T) the land should be cleared of rubbish and revert to scenic reserve.
8. Agree. This is already being done by WCC with BTB on the new trail in Polhill. There is therefore precedent for this approach.
9. Totally agree. In the past 7 years, BTB has planted 14,000+ native trees and undertaken invasive weed control in Polhill. This work will continue where required.

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Weeds and pest animals

11. Trails enable better access for this work to be carried out.
12. Pigs and goats continue to cause significant damage and the control of these animals has been far from sufficient. Pigs cause significant, widespread random damage to the landscape.
13. Agree
14. BTB believes there will be a considerable challenge fencing some parts of the boundary north of the Te Kopahou trig. However, a solution would be to fence near the trail BTB proposes to build or purchase the land below the road.
15. Agree, support and can assist. It is something BTB does already in Polhill.
16. + 17. Agree.
- NEW** = We query whether there are funds to purchase all the T&T landfill (or at least the western and northern aspects of the T&T landfill).

Research

18. Agree.
19. We are interested in this, particularly the prospect of trail access to the top of the quarry and down what's known as 'Elevator Shaft'.
20. Agree.
21. Agree
22. Agree. Trail networks enable better access for pest/predator control and wildlife monitoring. Polhill is living proof of the success of this approach.
23. Agree. The more you can access the landscape (via trails) the more you can research it.

6.7.2.3 Landscape and land use

Landscape management

2. The control of dumped products into the C&D landfill has been woefully inadequate. Their lease expires in 2026. We believe their lease should not be renewed. The wind-blown rubbish from this landfill onto the Tip Track and beyond is disgraceful. They do not deserve to have their lease extended.
NEW: Assuming the T&T landfill reaches capacity in the next five years, we seek confirmation that there will be no new lease granted beyond 2026.

6.7.2.4 Culture and Heritage

Protection and restoration of sites and features

1. Agree. These sites are of cultural significance and therefore of interest to people, including tourists. Trails should be encouraged to provide access to these historic sites and features. Currently, it is very challenging to get to these sites due to the rough terrain and poor-quality tracks (i.e. the sites high above the coast).
2. Agree.
3. Agree. But not at the expense of enabling human access.

4. Agree. Trails will enable better access for people and their tools/machinery to carry out these earthworks.
7. No issue with letting the Hape Stream dam naturally deteriorate – but it could be a site of interest for a new trail (in close proximity).

Interpretation

8. Agree. However, the ability to get to all these sites will be severely limited given the limited existing track network and the poor state of the existing network. Improved existing tracks and new trails will enable better access to cultural and heritage features.

6.7.2.5 Recreation and access

Recreational activities

1. Agree.

Track network

2. Agree. Brooklyn Trail Builders has proposed a trail network for Te Kopahou (see Appendix 1 – page 8). We believe this can be achieved and meet the requirements of this action point. However, we would welcome an efficient and effective consultation process that does not unduly delay this process. Points of interest should also be considered in this mix. We also query whether “professional” track builders are required for any assessment and believe ecological considerations should not outweigh recreational opportunities.
3. Point 3 isn’t required as the process associated with Point 2 above has to be worked through first. Note that we believe our low-density (i.e. less than Polhill) trail network will complement the existing tracks and enhance the user experience. For example, our proposed 42km loop trail track (utilising existing and new trails) from Aro Street to the south coast and back will become an iconic walking/running/riding destination for local and international visitors alike. For a ‘fly-through’ of this proposed loop see - <https://www.youtube.com/watch?v=L9YlddIJDOU&t=27s>
NEW = The establishment of a new trail network should exclude the costs of that establishment. BTB are primarily interested in the approval of that network with funding as a secondary consideration. Furthermore, private funding of iconic trails is a viable (and realistic) alternative to Council funding, alongside volunteer effort.

Track maintenance & development

9. Trails for recreational enjoyment should, as a rule, be separated from 4WD tracks (vehicles don’t mix with non-vehicular users. A 4WD track is not designed for broad recreational use).
10. Agree. This would also apply to any new trails that traverse streams.

Entrances, facilities and way finding

11. Agree. The area could also have a bike tool station.
12. Agree.
13. Agree.

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Way finding

14. Agree. A member of Brooklyn Trail Builders designed the windmill icon that appears on signage throughout Polhill to guide people to the Brooklyn wind turbine.
15. Agree. Users appreciate and expect this type of detail.

6.7.2.6 Community

4. Agree. Brooklyn Trail Builders support the proposed activities of the zip-line operators and have confidence they will fully contribute to long-term ecosystem protection and enhancement.

Summary:

Overall, Brooklyn Trail Builders supports the intent of the Draft OGBM Plan. We believe a vital part of the plan's success hinges on a greater focus on recreational opportunities for all user types.

Polhill is a classic example. BTB trails were initially built for recreation. Once people are exposed to nature (by using these trails), they embrace it and take greater interest and ownership of it and consequently care more about it – i.e. becoming involved in predator control, native tree-planting, policing domestic animals (as well as seeing/hearing the flourishing birdlife).

BTB shares WCC's Open Spaces Access Plan vision statement. The best way to roll this out is through a purpose-built; well-designed and thought-through trail network.

As BTB holds an MoU with WCC over all of Sector 7, we look forward to having a lead role in the consultation for this new trail network – and we hope for the most efficient consultation process as possible.

Appendix 1: Note this was submitted in March 2017.

7 March 2017



**Brooklyn Trail Builders (BTB) Response to the Review of
Te Kopahou Reserve and Careys Gully
as part of the Outer Green Belt Management Plan (OGBMP)
between Polhill Reserve and the South Coast**

General:

- BTB thank the Council for the opportunity to have input into the OGBMP.
- The BTB model and approach is based on the mantra of '**Trails, Trees and Traps**'. BTB want to extend the very successful Polhill Reserve model to the south coast. For us, this is conservation in action and supports the environmental, social and recreational benefits of Wellington's track network and Outcome 1: 'Getting everyone active and healthy' (as outlined on pages 3+4 of the Open Space Access Plan – September 2016). BTB has hand-built 15km of track to date and, anecdotally, users overwhelmingly agree with these benefits.
- BTB has a MoU with WCC and looks forward to continuing that relationship. We hope, in part as a result of this consultation process, the hurdles to building more tracks will be reduced. It is hoped voluntary groups with a proven record of building quality tracks will be actively encouraged to build more tracks that demonstrate benefits, e.g. linkages between tracks; tracks that go to useful places; tracks that provide access to previously inaccessible areas.

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- BTB acknowledge the strengths, weaknesses, opportunities and threats associated with the network and tracks and have an active and ongoing interest in addressing these.
- BTB agrees with the network principles specifically relating to track maintenance and signage (more fully detailed from page 11 in the Open Space Access Plan – September 2016). BTB also supports the principles relating to (Recreation Uses); (Track Design); (Track networks); (Track Assessment); and (Walking, running and mountain biking/cycling). BTB notes the Plan states that “further track work in this area will be considered as part of a future master plan”. This is reiterated on page 68 of the plan where it states: “Sector 7 – Investigate new track proposal that will extend purpose built walking/running/cycling tracks from Aro valley to the south coast – Brooklyn Trail Builders initiative. Should be investigated as part of the Te Kopahou Master Plan”.
- BTB sees the ongoing success of track development as a partnership approach with the Council and with like-minded volunteer groups involved in tree planting, pest eradication and other initiatives aimed at enhancing environmental, social, recreational and economic (e.g. tourism) benefits.
- Public art is proposed in featured locations to further encourage users into the environment.
- BTB also supports the shared-use of tracks by all users where it is appropriate and safe to do so.

Context

- BTB sees Te Kopahou as a wild, regenerating area, and is keen to maintain its raw, ecological richness.
- Access to many areas is nonexistent or by way of very steep 4wd tracks. While there has been goat and pig control, only recently has possum control begun. There is no control for rats or stoats/weasels.
- BTBs mantra of ‘trails, trees and traps’ has been successfully applied during the past nine years of our voluntary work. Explained further below, we strongly believe this approach is appropriate and relevant to develop Te Kopahou while maintaining, and indeed enhancing, its ecological values.

- BTB believes the proposed tracks can work in harmony with the area, and not conflict with ongoing ecological aims and values.
- In doing so, BTB want to work closely with the Council and other key stakeholders to identify any areas of ecological importance so these can remain untouched.

New tracks

[See map on page 14 of this document for indicative view of new tracks].

There is proven demand among users for a wider network of tracks and BTB has plans for a further 30km (approx) of additional track development in Te Kopahou (TK) and Carey's Gully (CG). Much of this track network could also be enhanced with features such as the installation of seats and sculptures at logical lookout and/or focal points.

TK New Track 1:

BTB has recently made a submission on a new 6km downhill track starting at the Hawkins Hill summit in Te Kopahou. This is an advanced (Grade 4+), narrow hand built, downhill track that links at the bottom with another track and finishes at the sea (Red Rocks). Much of the valley that this track uses has no access and, once constructed, can be used to plant trees and place traps.

This track will reduce fast downhill traffic from the current 4WD ridgetop track, allowing better separation for other users. It is possible to drive to the top of the track (e.g. for shuttle riding) for a 480m vertical descent, so it is ideal for MTB events.

TK New Track 2:

New Track 1 (above) will be complemented by a new 9km (approx) uphill track to the east, traversing Spooky Gully. This track will be an intermediate (Grade 3), two-way track for runners, walkers and mountain bikers. Likely to be digger built and will require funding in excess of \$200k. It will finish on a ridge adjacent to the south end of Barking Emu and will complete a 42km (marathon distance) Grade 3 loop that extends from the city to the sea and back to Aro Valley which would appeal to many users - note that 24km of this loop has already been built. Again, the valley that this track will climb through has very poor or no access and the track can be used to plant trees and place traps, enhancing the regeneration of Te Kopahau.

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BTB believe the above two new tracks are more logical Key Initiatives than some of those contained in the Open Space Access Plan. The tracks would feed into the proposed Rural Coastal Connection (pg 20 of plan) and add complementary dimensions to the "epic" route for mountain bike enthusiasts, runners and walkers.

Further options for Track 2 include:

- loop tracks (nature trails) at the bottom of Spooky Gully to provide more choice/shorter options that leverage off the investment WCC has made in Owhiro Bay/Red Rocks area.
- A link track to the existing 4WD tracks at the top of the old Quarry with interpretive signs and lookouts

TK other new tracks:

- A grade 3 track to the submarine lookout from the south coast.
- A duplicate track to Carparts Extension (between Windmill and Tip Track) that's lower down the slope (it could use part of the 4WD at the top of dump Stage 5).
- Investigate linkages to Bata Place.
- Investigate access through C&D landfill when the current lease expires.

CG New Tracks 3 to 7:

The end objective is to link the North-South BTB track network with the East-West WCC track network that starts with Wharangi on Happy Valley Rd. This link will go via the valley that contains the T&T clean landfill. This network has potentially 3-stages. Stage 1 would be on WCC land and would, initially, be intermediate/advanced uphill riding (track 3) accessed by an intermediate (track 4) and an advanced (track 5) downhill riding from Carparts track. Uphill riding would be made easier if stages 2 and 3 are enabled. Stages 2 and 3 are reliant on access through private land (and WCC owned but leased to T&T land). BTB has had discussions with WCC re land ownership and considers access is achievable. Stage 2 to Happy Valley Rd is an extension of track 3. Stage 3 is a spur track to Elliot Park – providing great linkages between different parts of Brooklyn.

A downhill track (track 7) from the Turbine to Happy Valley Rd (opposite Wharangi) generally following the Maori Gully ridge. This could be built independent of Stage 2 provided access across the WCC leased land can be negotiated*. This track is an easy private car shuttle route with a vertical drop of 320m.

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* The T&T lease expires in 2026 and BTB wish to be actively involved in any new lease. Our view is that only access rights (to the T&T private land) over the existing sealed road should be granted for a limited term, rather than a lease over the whole WCC owned block. This will allow FOOS access to a significant Owhiro Stream tributary and BTB the ability to build track 7. It will also provide more land for building track 3 extension (noting that an easement or boundary adjustment of T&T land will be needed to complete track 3 – this can logically be done as part of the WCC lease negotiations) and possibly track 6 (depending on adjoining owners off Ashton Fitchett Drive).

Background info

Trails meet our goal for people to have access to and contact with nature. They also allow access for tree planting, weed removal and pest control.

Trees help restore native vegetation, and by being planted by volunteers, allows locals and school groups to form a bond with the area.

Traps meet our goal of helping restore the ecology of the area. It is our long-term aim to help get kiwi back to Te Kopahou.

Hawkins Hill is one area where BTB has built tracks and planted trees.

It's bordered to the north west by the Zealandia Sanctuary, and many rare birds have spilt over from the Sanctuary into this area, including Saddleback, North Island Robin, Kaka, Hihi and Karariki.

While there is ongoing possum control in the area, there is no designated pest control for rats, stoats or weasels. BTB has raised \$20,000 dollars and signed an MOU with WCC to set up a trapping network across 100 hectares so these bird populations may better survive and breed outside the Sanctuary. BTB has also worked closely with the two landfill operators to ensure good communication and safety of volunteers.

The trapping network will consist of two 3km trap lines of DOC 200 traps interspersed with Victor traps. This will cover 30 hectares.

The remaining 70 hectares will be covered by Good Nature self-setting A24s.

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Monitoring tunnels are in place and the network is currently being set out.

The long-term goal is to extend this network over 200 hectares and encompass Happy Valley and Carlucciland.

The trapping network will border an existing trapping network to the north, run by another volunteer group.

The local community realise they are in a special place, a Capital city with rare bird life spilling over from the Sanctuary and literally into their backyards.

Through the years, BTB has built up a strong relationship with the community, including schools and businesses. Many individuals and businesses have already volunteered for this project and it's our aim to encourage more people to be part of this worthy cause and enjoy the wild places bordering our city.

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Sector 7 - Te Kopahou / Carey's Gully

Property boundaries, site contours, and roads, all the address & site points, sourced from Land Information NZ. Course boundaries sourced from Property Information Authority, up to 1:10,000 scale, or 1:25,000 scale. Contour data sourced from Easysite NZ. Proposed course from 1:25,000 scale. Assets, contours, water and drainage information shown in appropriate and used as the latest engineering data. Other data has been compiled from a variety of sources and its accuracy may vary, but is generally of the

ORIGINAL MAP SIZE: A4
AUTHOR: [redacted]
DATE: 01/09/2018
REFERENCE: [redacted]
Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

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First Name:

Dave

Last Name: *

Nendick

Organisation:

Welly Tracks Mountain Bike Group

On behalf of:

Postal Address:

Suburb:

Newtown

City:

Wellington

Country:

New Zealand

PostCode:

6021

eMail: *

Preferred method of contact

☒ Email

☐ Postal

Daytime Phone:

Mobile:

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

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OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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1. Do you agree that the Vision statement on the front of the [Summary Document](#) or in [Part 2 of the draft plan \(starts page 12\)](#) captures what is special about the Outer Green Belt Reserves?

- ☒ Yes
☐ No
☐ Don't know

If not, why not?

2. Looking at the [Summary Document](#) section 'What is the Outer Green Belt?' or at [Part 2.3 \(starts page 13\)](#) and [Part 3 \(starts page 16\)](#) of the draft plan, do you agree with:

	Yes	No	Don't know
The Guiding Principles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Key Values	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Looking at the plan highlights in the [Summary Document](#), do you think these will help achieve the Vision that *the Outer Green Belt...*

	Yes	No	Don't know
is Wellington's wild green connector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
visibly defines the edge of the city	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects and connects nature	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
invites people to escape and explore	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Why/why not?

4. Looking at [Parts 3.6 \(starts page 30\)](#), [3.7 \(starts page 31\)](#) and [4.6 \(starts page 65\)](#) of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

- ☐ Yes
☒ No
☐ Don't know

What do you think could be added?

5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years ([refer to part 4.5 of the draft plan - starts page 52](#)). Do you agree that this should be the main priority?

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- ☒ Yes
☐ No
☐ Don't know

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again ([refer to Part 4.5.2.3](#) - starts page 54). [Click here for maps showing the proposed track networks.](#)

6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

	Yes	No	Don't know
Sector 1	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 2	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 3	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 4	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 5	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 6	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 7	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan that would allow for greater accessibility to the Outer Green Belt by a wide range of people.

Is there anything missing that would help?

The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less
- Areas of regenerating native bush won't get damaged

Cons

- Areas won't look as rural
- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other

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OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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- means to maintain the existing character and views
- People won't be able to see farm animals

8. Do you support the draft plan proposal to phase out grazing animals?

- ☒ Yes
☐ No
☐ Don't know

Why/why not? What ideas do you have to balance out the pros and cons?

9. The draft plan proposes that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones (refer to the map of the entrances on page 60 of the draft plan). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

	Yes	No	Don't know
Do you support this proposal?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you think it will encourage more people to use the Outer Green Belt reserves?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please rank the proposed new entrances in order you think we should complete them. The new entrances are planned for the Brooklyn wind turbine; Wrights Hill; Chartwell Bush/woolshed; 268 Ohariu Valley Road or McLintock Street; and Ohariu Valley Road or Upper Stebbings Valley.

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

- ☒ Yes
☐ No
☐ Don't know

Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also considering the management of all of the areas as a connected whole.

The Summary Document lists the key actions for each sector (shown on the Map Page), sector descriptions.

11. **Sector 1 (Te Ngahere-o-Tawa/Redwood)** is the northernmost part of the Outer Green Belt, extending from the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

Do you agree with the actions for this sector?

☒ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

12. **Sector 2 (Ohariu Ridge)** runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☒ ☐ ☐

Does the draft plan support community partnership in this sector?

☒ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☒ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

Do you agree with the actions for this sector?

☒ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

13. **Sector 3 (Kaukau)** extends from Old Coach Road above Johnsonville to the Chartwell Spur above Crofton Downs. It is also the backdrop to Broadmeadows, Khandallah and Ngaio.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☒ ☐ ☐

Does the draft plan support community partnership in this sector?

☒ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☒ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

Do you agree with the actions for this sector?

☒ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

14. **Sector 4 (Chartwell/Karori Park)** extends from Chartwell Spur above Crofton Downs through to the Makara Road along Te Wharangi ridge via the Kilmister Tops and Johnston Hill above Karori.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☒ ☐ ☐

Does the draft plan support community partnership in this sector?

☒ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☒ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

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OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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Do you agree with the actions for this sector?

Please add here anything relevant to this sector that you think is not covered in the plan.

See the Western Trail Alliance Submission and Wellington Mountain Bike Club's submission on these points.

15. **Sector 5 is Makara Peak.** This sector includes the mountain bike park.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

16. **Sector 6 (Wrights Hill/Zealandia)** extends from South Karori Road, across Wrights Hill and the valley of Zealandia.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

17. **Sector 7 (Te Kopahou)** extends from Zealandia along the main ridgeline, taking in the Brooklyn wind turbine, Hawkins Hill and Te Kopahou before descending all the way down to the South Coast.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Please add here anything relevant to this sector that you think is not covered in the plan.

See The Brooklyn Trail Builders and Wellington Mountain Bike Club's submission

18. Do you have any comments on the [proposed reserve classifications in the draft plan](#)? Please provide the name and/or legal description of the reserve and your comments.

See the Wellington Mountain Bikes Club's submission

19. Please add here any other comments or suggestions you have in regard to the Outer Green Belt Management Plan.

The Welly Track Mountain Bike Group (approximately 4200 members) supports the submission made by the Wellington Mounatin Bike Club, Western Trail Alliance and Brooklyn Trail Builders. We are mountain bikers and walkers and runners who are volunteers who build tracks, plant trees and shrubs (one new plant for every metre of track built) and we also conserve nature by managing introduced pests and weeds in cooperation with Wellington City Council and in accordance with WCC bylaws. Note: It is essential to ensure dogs are kept on leads in all WCC reserves to protect the public and endure native fauna is protected, given we work so hard to eradicate introduced pests. Cats should also be managed as much as possible in and around reserves for the same reasons.

Attached Documents

File
Outer Green Belt Management Plan 2019

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Submission to the
Wellington City Council

Draft Outer Greenbelt
Management Plan

January 2019

Doug Calhoun

22 March 2019

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Summary

1. I have lived on Versailles Street next to the Strip for the last 45 years – from 1974 to 1991 at no. 37 and, since 1991, at no. 23. Over that time I have mown the grass and gorse next to my property to maintain the Strip as a firebreak.
2. From 1994 to 1999 I was involved in negotiations with the Wellington Regional Council, the Wellington City Council and the Karori Sanctuary Trust as a member of the Versailles Street Residents Group. The result was that the predator proof fence was sited down the hill from and next to a buffer of native trees above the track between the Strip and the fence to meet the security and privacy concerns of the Group.
3. Because the Strip was considered surplus to the needs of the Trust, the City Council offered to sell a 5-metre wide portion extending outwardly from our boundaries with a six-month option date. The valley land transfer from the Regional Council to the City Council took five years to be completed, so the option lapsed. Since 1999 I have heard nothing from the Council.
4. During the 45 years that I have lived next to the Strip the only time either the Regional Council or the City Council have shown any interest in it was while the Sanctuary was being established. So you can image my surprise and chagrin when I learned that the City Council had suddenly decided that the status and nature of the Strip were to be completely changed and none of the prior commitments of the Council were to be honoured.
5. The City Council has a very risk averse attitude to its buildings – one need only visit Civic Square to see this. But it has a very cavalier attitude to the risk of rural fires at the rural/urban interface. The proposal to revegetate the Strip would compromise the existing firebreak. This ignores not only the evidence-based advice of Fire and Emergency New Zealand, but also its own advice to homeowners.
6. I found the interactions with the Council 20 years ago very stressful. The current ones are even more so. The Council should not treat its neighbours in the way we have been treated. This time I wish to have the matter settled once and for all.
7. The concept of “botanical enhancement” in the plan describes what I have been doing for the last 45 years. I would like to negotiate that or some similar final settlement.
8. I wish to be heard when the Council takes oral submissions.

The Strip

9. The land I refer to as the Strip is shown in green in Figure 1¹ below:



Figure 1. The strip

No. 23 is the second section from the top of the Strip. The track and predator proof fence and the existing buffer of trees are to the right of the Strip. The heavy forestation up from the lower lake in the valley is very clear. The steepness of the slope down to the lake is less clear in two dimensions, but very real.

10. The future development proposed for the strip is “Removal of private encroachments and restoration of native vegetation as a buffer to Zealandia. Potential for a walking track.” I have two questions for the council: Why are the existing buffer and walking track not perfectly adequate? What has changed since their siting was agreed to in recognition of the concerns of the residents 20 years ago?

¹ Reproduced from page 14 of *Proposed Reserves Classification: Outer Green Belt Management Plan 2019*. The legal description is Lot 3 DP 313319 CT 52415

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Consultation

11. In the Officers' report (to the City Strategy Committee on 13 December 2018) that sought approval for the 2019 Draft Plan to be circulated, one of the objectives was said to be, "Engage with adjacent landowners to identify their concerns around use and development of the Outer Green Belt." I am an adjacent landowner. I was not engaged with.
12. The engagement principles were:
 - open and honest communication with stake holders and the wider community
 - provision of regular and relevant information on the plan review
 - sufficient time for consultation
 - views received in the feedback must be taken into account
 - aim to resolve issues in a proactive, timely and appropriate manner
 - the approach should be flexible, and able to be adapted.
13. These principles were tempered by the observation, "The project has a 'Medium' Rating, therefore our approach was to at least 'Involve' the public in the process." The inference I take from that is that my neighbours and I did not meet the 'Medium' rating and therefore did not need to be consulted.
14. I, together with some of my neighbours, did invite a council officer to visit the Strip on 17 January 2019. We were told:
 - the Council intends that all plans adhere strictly to the Rules section of the reserves policy;
 - there are no exceptions to the Rules and they will be fully applied. There is no reason for the strip to be different from other areas;
 - history makes 'no difference' under any circumstances;
 - encroachments are any private use of reserve land, including mowing the lawn;
 - the Council does not issue permits to encroach and, over a period of time, the Council intends to remove all encroachments. Private management of public space is not permitted (mowing, clothes lines, structures);
 - there should be no private gains from reserve grassy areas (eg capital asset value increase);
 - the Council does not police encroachments but they can instruct the removal of encroachments at any time;
 - the Strip is reserve land and will be part of a greater network of reserve land going from Porirua to the South Coast; and
 - evidence shows natives bush and trees are a better firebreak than grass.
15. I was stunned by this lecture. About the only engagement principle it complied with was "open" communication, albeit the openness was all one way. The officer did state that we could "convey the values" we would like

to maintain, but only as the Council implements changes to the land. As for “taking into account views received in feedback”, my views about the history, firebreak and legal status of the Strip were flatly rejected as irrelevant.

16. The ultimate insult was the officer’s dismissal of a neighbour’s concern about the potential loss of the value of their property, “You ought to have realised that when you bought the property”. Blaming the victim has no place in any consultation.
17. One of my neighbours made a request for official information from the Council. Some of that information contradicts the assertions made:
 - the Strip is not a reserve. It is zoned conservation.
 - council owned fee simple land can be dealt with as the Council sees fit. Reserve land is not “owned” by the Council but is administered consistently with the relevant management plan in accordance with the Reserves Act.
 - cutting grass is not an encroachment. The council encourages residents to maintain their adjoining road reserve (by mowing it).
 - buried in the hundreds of pages of agreements and District Plan change information supplied are the various commitments made as a part of both the lease to the Sanctuary Trust and the sale from the Regional Council to the City Council. These include the arrangement made on the siting of the fence to meet the security and privacy concerns of the adjacent residents. Also recorded is the arrangement (acknowledged by the Regional Council) that the residents’ maintenance of the Strip had been in place since 1961 (when the first house was built) for the mutual benefit of the residents and the Regional Council.
 - there are around 400 encroachments on reserves and town belt land. Since 1993, only about 30 have been resolved by licences or letters of understanding.
18. The insinuation that we have made a “private gain” by our use of the strip is misconceived. The Strip has always been treated as a community space where neighbours can walk from house to house, have street barbecues, play, watch fireworks, enjoy the harbour views and even (one time) have a wedding. When I moved from 37 to 23 I transported most of my worldly goods along the Strip by wheelbarrow. The “gain” that we have enjoyed is no more a “private gain” than is the use of the Ben Burn Park playground, cricket pitch, running track or football goalposts by its neighbouring residents. And the neighbours of Ben Burn Park do not have to cut its grass to enjoy it.

Firebreak

19. The assertion that evidence shows that native plants make a better firebreak than grass has to be qualified. Some native plants are less flammable than long dry grass. But the strip is not covered in long dry grass; it is covered in short mown grass. The one thing common in the

spreading of wildfires is the amount of fuel in their path. And mown grass does not provide even a small fraction of the amount of fuel that complete revegetation with native plants would.

20. There are at least three relevant scientific papers that provide evidence about wild fires in New Zealand. A 1996 paper² describes two fires in 1994 on the western rim of Karori that threatened to burn houses on Montgomery Avenue. (The site of those fires is a now part of the Outer Green Belt.) The paper describes and quantifies how intense wildfires can be in extreme conditions. And the wild fires described occurred on a ridge top on the other side of Karori similar to the situation of the Strip.
21. The second paper³ sets out a flammability table of selected New Zealand native species derived from surveys of fire managers. On page 7 of that paper the author concludes that none of the species was classified as Not-flammable or Low/Not flammable. The paper also graphically illustrates defensible space requirements to protect houses from wildfires. There needs to be a defensible space of 20 to 40 metres away from a steep forested slope. The illustration is reproduced as figure 2. The Strip is adjacent a very steep heavily forested slope in a high wind area. The maximum width of the Strip is about 26 metres.

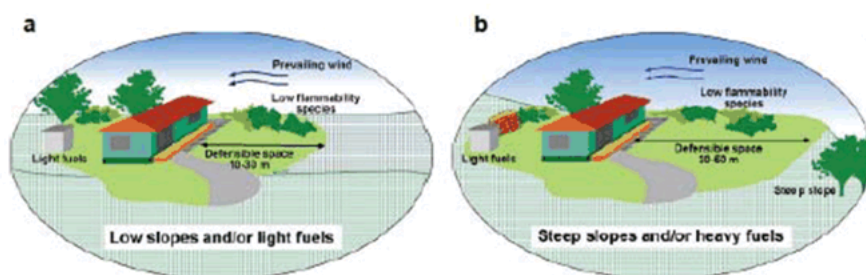


Figure 2. Defensible space requirements around a house in (a) low slopes and/or light fuels, and (b) steep slopes and/or heavy fuels.

² L.G. Fogarty, *Two Rural/Urban Interface fires in the Wellington suburb of Karori: assessment of associated burning conditions and fire control strategies*: <https://scion.contentdm.oclc.org/digital/collection/p20044coll13/id/18/>

³ L.G. Fogarty *A Flammability Guide for Some Common New Zealand Native Trees and Shrub Species*: <https://fireandemergency.nz/assets/Documents/Research-and-reports/Report-20-A-Flammability-Guide-for-Some-Common-New-Zealand-Native-Tree-and-Shrub-Species.PDF>

22. The third paper⁴ ranked 60 trees or shrubs for comparable flammability. The rankings were made by burning shoots of each one under the same conditions on a device resembling a barbecue. The authors measured each species for four properties of flammability. Their rankings largely agreed with the rankings in the second paper - derived 14 years earlier based on survey evidence of forest managers.
23. Shortly after the Port Hills fire in Christchurch two of the authors of the third paper did a PowerPoint presentation of their results for a local audience. The take home message of that presentation is shown in figure 3.



So green firebreaks offer potential to help manage fire and, if natives used, improve biodiversity, but...there is no such thing as a fire-proof plant. Given the right conditions (e.g. extreme fire weather), any plant will burn.

Figure 3. No such thing as a fire-proof plant

⁴ Wyse et al., *A quantitative assessment of shoot flammability for 60 tree and shrub species supports rankings based on expert opinion*:
<https://researcharchive.lincoln.ac.nz/bitstream/handle/10182/6884/WF15047.pdf;sequence=1>

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24. New Zealand Fire and Emergency's advice to homeowners living next to slopes⁵ mirrors the advice given in the second paper. The illustration Fire and Emergency use to demonstrate defensible zones is shown in figure 4.



Figure 4. Defensible Zones

25. The Council's own advice to homeowners about how to defend your home against scrub fires⁶ acknowledges the risk of fires at the rural/urban boundary. The warning is, "Residents around the town belt are equally at risk from vegetation fires as people living in rural areas. Take precautions to protect your homes." That message has been ignored in the 2019 Draft Management Plan.

The Way Forward

26. I am not sure that I will still be around for another battle with the Council in 20 years' time. So I would really like to see the matter settled once and for all this time. The 17 January Council officer visit was not a promising start, but my neighbours and I are more than willing to talk to anyone willing to listen to our concerns with an open mind. The suggestion below for dealing with my "encroachment" should not be taken as a formal offer and is not intended to pre-empt any suggestions of a way forward by my neighbours. But it is intended as a start.
27. When I finally got down to pages 86 and 87 of the 2019 Draft Plan I discovered "Botanical Enhancements". The relevant paragraph⁷ reads:

"Botanical enhancements" are small areas of land that are maintained and/or enhanced by a neighbour through planting or vegetation

⁵ The link to the advice is: <https://fireandemergency.nz/at-home/rural-home-fire-safety-checklist/>

⁶ The link to the advice is: <https://wellington.govt.nz/~media/about-wellington/emergency-management/files/scrubfires.pdf?la=en>

⁷ Draft Outer Green Belt Management Plan January 2019, page 86

management in keeping with the open space values and character. These are managed by way of a “letter of understanding”, which must be obtained by anyone who has or promises to undertake “botanical enhancement”. For the purposes of managing encroachments, botanical enhancements are not considered encroachments and therefore are not by default prohibited.”

Of course, terms and conditions apply. Terms I would insist on would be the maintenance of the existing firebreak and that the existing track next to the predator proof fence would not be duplicated by any other track on the Strip.

28. I point out that for the first 30 years that I was mowing “my” bit of the Strip I did have an informal arrangement - acknowledged as being mutually beneficial – with the Regional Council (and its predecessor Strip owners) to carry out what amounted to “botanical enhancements”. The only difference I can see between what I have been doing for the last 15 years and “botanical enhancements” described in the 2019 Plan is that I haven’t have a “letter of understanding”.

29. I wish to be heard when the Council takes oral submissions.

My Details

1. **Name:** Doug Calhoun
2. **Email addresses:** [REDACTED]
3. **Postal address:** [REDACTED]
Karori, Wellington 6012
4. **Capacity:** I am making this submission as an individual.
5. **Oral Submission:** I would like to make an oral submission to the Councillors.
6. **Telephone Numbers:** [REDACTED]

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First Name:

Gary

Last Name: *

Beecroft

Organisation:

Personal

On behalf of:

Postal Address:

Suburb:

Tawa

City:

Wellington

Country:

New Zealand

PostCode:

5028

eMail: *

Preferred method of contact

☒ Email

☐ Postal

Daytime Phone:

Mobile:

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

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OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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1. Do you agree that the Vision statement on the front of the [Summary Document](#) or in [Part 2 of the draft plan \(starts page 12\)](#) captures what is special about the Outer Green Belt Reserves?

- ☐ Yes
☒ No
☐ Don't know

If not, why not?

I have made a written submission

2. Looking at the [Summary Document](#) section 'What is the Outer Green Belt?' or at [Part 2.3 \(starts page 13\)](#) and [Part 3 \(starts page 16\)](#) of the draft plan, do you agree with:

	Yes	No	Don't know
The Guiding Principles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Key Values	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Looking at the plan highlights in the [Summary Document](#), do you think these will help achieve the Vision that *the Outer Green Belt...*

	Yes	No	Don't know
is Wellington's wild green connector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
visibly defines the edge of the city	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects and connects nature	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
invites people to escape and explore	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Why/why not?

I have made a written submission

4. Looking at [Parts 3.6 \(starts page 30\)](#), [3.7 \(starts page 31\)](#) and [4.6 \(starts page 65\)](#) of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

- ☐ Yes
☐ No
☐ Don't know

What do you think could be added?

I have made a written submission

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5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years (refer to part 4.5 of the draft plan - starts page 52). Do you agree that this should be the main priority?

- ☐ Yes
☐ No
☐ Don't know

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again (refer to Part 4.5.2.3 - starts page 54). [Click here for maps showing the proposed track networks.](#)

6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

	Yes	No	Don't know
Sector 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 3	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 4	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 5	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 6	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 7	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

I have made a written submission

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan that would allow for greater accessibility to the Outer Green Belt by a wide range of people.

Is there anything missing that would help?

I have made a written submission

The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less

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OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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- Areas of regenerating native bush won't get damaged

Cons

- Areas won't look as rural
- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other means to maintain the existing character and views
- People won't be able to see farm animals

8. Do you support the draft plan proposal to phase out grazing animals?

- ☐ Yes
☐ No
☐ Don't know

Why/why not? What ideas do you have to balance out the pros and cons?

I have made a written submission

9. The draft plan proposes that that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones (refer to the map of the entrances on page 60 of the draft plan). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

	Yes	No	Don't know
Do you support this proposal?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you think it will encourage more people to use the Outer Green Belt reserves?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please rank the proposed new entrances in order you think we should complete them. The new entrances are planned for the Brooklyn wind turbine; Wrights Hill; Chartwell Bush/woolshed; 268 Ohariu Valley Road or McIntock Street; and Ohariu Valley Road or Upper Stebbings Valley.

I have made a written submission

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

- ☐ Yes
☐ No
☐ Don't know

Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also considering the management of all of the areas as a connected whole.

The Summary Document lists the key actions for each sector (shown on the Map Page), sector descriptions.

11. **Sector 1 (Te Ngahere-o-Tawa/Redwood)** is the northernmost part of the Outer Green Belt, extending from

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the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

I have made a written submission

12. **Sector 2 (Ohariu Ridge)** runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

I have made a written submission

13. **Sector 3 (Kaukau)** extends from Old Coach Road above Johnsonville to the Chartwell Spur above Crofton Downs. It is also the backdrop to Broadmeadows, Khandallah and Ngaio.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

I have made a written submission

14. **Sector 4 (Chartwell/Karori Park)** extends from Chartwell Spur above Crofton Downs through to the Makara Road along Te Wharangi ridge via the Kilmister Tops and Johnston Hill above Karori.

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Yes No Don't
know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

I have made a written submission

15. **Sector 5 is Makara Peak.** This sector includes the mountain bike park.

Yes No Don't
know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

I have made a written submission

16. **Sector 6 (Wrights Hill/Zealandia)** extends from South Karori Road, across Wrights Hill and the valley of Zealandia.

Yes No Don't
know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

I have made a written submission

17. **Sector 7 (Te Kopahou)** extends from Zealandia along the main ridgeline, taking in the Brooklyn wind turbine, Hawkins Hill and Te Kopahou before descending all the way down to the South Coast.

Yes No Don't
know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

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this particular area?

Does the draft plan support community partnership in this sector?

Does the draft plan support use of this sector by a wide range of people?

Will the plan ensure the natural environment continues to be protected and improved in this sector?

Do you agree with the actions for this sector?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

I have made a written submission

18. Do you have any comments on the [proposed reserve classifications in the draft plan](#)? Please provide the name and/or legal description of the reserve and your comments.

I have made a written submission

19. Please add here any other comments or suggestions you have in regard to the Outer Green Belt Management Plan.

I have made a written submission

Attached Documents

File
001 Submission to OGBMP Beecroft gbv2
Outer Green Belt Management Plan 2019

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Tawa Park										
		visiter	Survey	Dec.	2018 to	February	2019			
Date		CHK	Time all pm	Larsen Crescent Park	Notes	Brasenose Park	Notes	Lyndhurst Park	Notes	Willow-bank Reserve
Dec. 18										
22				0		0		0		0
23				0		0				
24				0		0				
25		chk	3-3.30	0		0		3	1 parent 2 child U 10	3
26		chk	3.10 - 3.45	0		0		0		2
27		chk	3.51 - 4.08	0		0		3	1 parent 2 child U 10	0
28		chk	1.08 - 1.33	0	9-9.30	0		0		1
29		chk	1. - 1.43	0		0		2	parent child U 10	
30		chk	2.44 - 3.17	0		2	Ad runners	0		0
31		chk	2 - 2.4	0		0		0		0
Jan 19										
1	tues	chk	3-3.40	0		2	1 p 1 ch under 10	0		7
2	wed	chk	3-3.40	0		0		0		3
3	thurs	chk		0		0		0		1
4	fri	chk	4.19- 4.34	0		0		0		3
5	sat			0		0		0		0
6	sun		1.08 - 1.33	0		0		0		2
7	mon		1.08 - 1.33	0		0		0		3
8	tues		1.08 - 1.33	0		0		0		1
9	wed		1.08 - 1.33	0		0		0		3
10	thurs		1.08 - 1.33	0		0		0		0
11	fri		2.30- 3.30	0		6	1ad 2 ch U 10; 3 teens	0		2
12	sat		1.08 - 1.33	0		4	children over 12	3	1 ad 2 ch	3
13	sun		1.08 - 1.33	0		3	1ad+2 ch walkers	2		3
14	mon		1.08 - 1.33	0		4	teens	4	ad 3 ch	0
15	tues		1.08 - 1.33	0		0		0		0
16	wed		1.08 - 1.33	0		0		0		0
17	thurs		1.08 - 1.33	0		0		0		0
18	fri		1.0 - 2.0	0		0		0		0
19	sat		2pm+4 pm.	0		4	teens	5		6

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20			1.08 - 1.33	0		2		2		See other table for 20 Jan- 28 Feb.
21			1.08 - 1.33	0		2		0		
22			1.08 - 1.33	0		0		2		
23			1.08 - 1.33	0		0		0		
24			1.08 - 1.33	0		0		0		
25			1.08 - 1.33	0		2		0		
26			1.08 - 1.33	0		4		0		
27			1.08 - 1.33	0				0		
28	mon	ck	12-1 p.m	0		0		0		
29	tues	ck	1-2 p.m.	0		0		0		
30			2 - 2.4			2		2		
31			2 - 2.4			0		5		
February 2019			2 - 2.4					0		
1	Fri	chk	2-3 pm.	0		0		0		
2	Sat	chk	5-6 p.m	0		0		7	3 adults 4 ch U 10	
3	sun	chk	2.30- 3.30			0		3		
4			2.30- 3.30	0		2		0		
5			2.30- 3.30	0		3		0		
6			2.30- 3.30	0		0		0		
7			2.30- 3.30	0		0		0		
8			2.30- 3.30	0		0		2		
9	F sat		2.30- 3.30	0		4	1 ad 3 ch	3		
10			2.30- 3.30	0		2	adults	5		
11			3.10 - 3.45	0		0		0		
12			3.10 - 3.45	0		0		0		
13			3.10 - 3.45	0		0		0		
14			3.10 - 3.45	0		0		2		
15			3.10 - 3.45	0		0		2		
sat 16			3.10 - 3.45	0		2	1 ad 1 ch	3		
17			3.10 - 3.45	0		3	1 ad 2 ch	2		

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18	3.10 - 3.45	0	0	0
19	3.10 - 3.45	0	0	0
20	3.10 - 3.45	0	0	0
21	3.10 - 3.45	0	0	0
22	3.10 - 3.45	0	0	0
Sat. 23	3.10 - 3.45	0	5	2 ad 3 ch
24	3.10 - 3.45	0	2	adults
25	3.10 - 3.45	0	0	0
26	3.10 - 3.45	0	0	0
27	3.10 - 3.45	0	0	0
28	3.10 - 3.45	0	0	0
Mar-01	3.10 - 3.45	0	0	0
sat 2	3.10 - 3.45	0	1	adults
3	3.10 - 3.45	0	0	2
4	3.10 - 3.45	0	2	0
5	3.10 - 3.45	0	0	0
6	3.10 - 3.45	0	0	0
7	3.10 - 3.45	0	1	adults
8	3.10 - 3.45	0	0	0
sat. 9	3.10 - 3.45	0	0	5
10	2 - 2.4	0	3	1 ad
11	2 - 2.4	0	0	0
12	2 - 2.4	0	1	adults
13	2 - 2.4	0	0	0
14	2 - 2.4	0	0	0
15	2 - 2.4	0	0	0
sat. 16	1.0 - 2.0	0	3	f and ch
17	1.0 - 2.0	0	1	adult
18	1.0 - 2.0	0	0	0
19	1.0 - 2.0	0	0	0
20	1.0 - 2.0	0	0	0
21	1.0 - 2.0	0	0	2

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See other
table for
jan and
Feb.

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22	1.0 - 2.0	0	0	3	
sat. 23	1.0 - 2.0	0	2	6	
People Totals		0	74	95	181
days of Survey		97	97	95	72
Average		0.00	0.76	1.00	2.51
Car parks					
Upper Larsen Cr	200	220	240	2	900
Lower Larsen					4.30
Kiwi crescent					209
total of this St. area					
average car length in M used in calc.					
Rugby Club area					

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Notes	Victory Park	Notes	Grassless Park Play	Notes	Grassless Park Picnic	Notes	Total	weather
	0		0					
	0							
	0							
1 parent 2 child U 10	0		6	2 Ad 4 ch U 10	4	4 ad		
ad + dog	0		5	1 parent 4 child U 10	0			
	0		10	6 ad M 4 ch under 10				
to train	0		7	3 ad 4 ch under 10	0			
	0		4	2 ad 2 ch under 10	0	No Pictures Cam at home		
2 Dog walker 2D on dog track 1 runner	0		15	4 ad 3 ch U10 - 8 bskbl	0			
	0		12	6 ad M 6 ch under 10	2	no camera		
4 ad 3 ch U 10	0		70	most child U 10	30	most adults		
2 ad 1 ch u 10	0		12	6 ad 6 ch u 10	0	No Camera		
adult	0		28	12 ad 15 ch 2 teens	8	ad picnicg		
2 ad 1 ch u 10	0				0			
	0				10			
	9	7 basketball 3 children			6			
	0				0			
	0				0			
	0				0			
	0				0			
	0				0			warm sunny
	3				3			warm sunny
	2				2			warm sunny
	0				0			warm sunny
	0				0			wet drizzle
	0				0			
	0				0			
	0				0			
	7				3			

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See other table for 20 Jan- 28 Feb.	2				6			
	0				0			
	0				0			
	0				0			
	0				0			
	0				0			
	0				0			
	0				4			
	0				3			
	0		34	10 ad + 24 ch U 10	0			hot sunny
	0		39	12 ad + 27 ch U 10	0			hot sunny
	2				NR			
	1				NR			
	2				NR			
	0		18	8 ad + 10 ch U 10	0			Hot sun + cloud
	9	2 ad+2ch U 5 - 3 BaskBl 2 sitters	19	7ad+7u10- 4 bskbl - 1 wker	5			sunny warm evening
	0		28	12ad+9chU10- 5 ad bikers-5ad- resting	7			
	0		No further Records	No further Records		No further Records		
	2							
	1							
	0							
	0							
	3							
	2							
	0							
	0							

0

0

No further
Records

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See other table
for jan and
Feb.
No Futher
records

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45	307	93	400
58	46	46	46
0.78	6.67	2.02	8.70

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Date		Time	Adults	Children	Total
20/01/2019	Sunday	1220	1	2	3
		1540	0	0	0
		1755	4	9	13
21/01/2019	Monday	1105	0	0	0
		1335	0	0	0
		1745	0	0	0
22/01/2019	Tuesday	1035	0	0	0
		1515	0	0	0
		1820	2	2	4
23/01/2019	Wednesday	1425	0	0	0
		1715	1	1	2
24/01/2019	Thursday	1210	1	2	3
		1415	0	0	0
		1655	0	0	0
25/01/2019	Friday	1015	0	0	0
		1310	0	0	0
		1455	0	0	0
		1735	0	0	0
26/01/2019	Saturday	1425	0	0	0
		1640	2	2	4
27/01/2019	Sunday	1220	0	0	0
		1520	1	1	2
		1635	3	5	8
28/01/2019	Monday	1335	0	2	2
		1435	1	2	3
		1855	0	0	0
29/01/2019	Tuesday	1130	0	0	0
		1305	0	0	0
		1535	0	8	8
30/01/2019	Wednesday	1410	0	0	0
		1735	0	0	0
31/01/2019	Thursday	1215	0	0	0
		1355	0	0	0
1/02/2019	Friday	1105	0	0	0
		1420	0	0	0
		1715	0	0	0
2/02/2019	Saturday	1150	1	2	3
		1505	1	1	2
		1840	2	2	4
		1745	0	0	0
3/02/2019	Sunday	1225	0	0	0
		1550	1	1	2
		1725	2	2	4
4/02/2019	Monday	1100	0	0	0
		1425	0	0	0
5/02/2019	Tuesday	1300	0	0	0
		1625	0	0	0

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6/02/2019	Wednesday	1510	0	3	3
		1715	0	0	0
7/02/2019	Thursday	1250	0	0	0
		1420	0	0	0
		1545	0	5	5
8/02/2019	Friday	1150	0	0	0
		1420	0	0	0
		1655	0	2	2
9/02/2019	Saturday	1205	1	2	3
		1410	0	0	0
		1715	2	4	6
10/02/2019	Sunday	1230	0	0	0
		1440	2	3	5
		1650	0	0	0
11/02/2019	Monday	1415	0	0	0
		1700	0	0	0
12/02/2019	Tuesday	1235	0	0	0
		1450	0	0	0
		1705	0	2	2
13/02/2019	Wednesday	1155	0	0	0
		1315	1	3	4
		1645	0	0	0
14/02/2019	Thursday	1245	0	0	0
		1425	0	0	0
		1640	0	0	0
15/02/2019	Friday	1225	0	0	0
		1450	0	0	0
		1725	0	0	0
16/02/2019	Saturday	1325	2	2	4
		1655	0	0	0
		1750	0	0	0
17/02/2019	Sunday	1130	1	1	2
		1520	1	1	2
		1725	0	0	0
18/02/2019	Monday	1235	0	0	0
		1515	0	0	0
19/02/2019	Tuesday	1350	0	0	0
		1735	1	2	3
20/02/2019	Wednesday	1225	0	0	0
		1610	0	4	4
		1745	0	0	0
21/02/2019	Thursday	1405	0	0	0
		1625	2	3	5
22/02/2019	Friday	1240	0	0	0
		1445	0	0	0
		1755	0	0	0
23/02/2019	Saturday	1155	1	1	2
		1455	2	3	5
		1740	0	0	0
24/02/2019	Sunday	1215	1	2	3

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

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		1425	2	2	4		
		1555	1	2	3		
		1715	0	0	0		
25/02/2019	Monday	1400	0	0	0		
		1605	0	0	0		
26/02/2019	Tuesday	1245	0	0	0		
		1515	0	0	0		
27/02/2019	Wednesday	1310	0	0	0		
		1535	0	0	0		
28/02/2019	Thursday	1210	0	0	0		
		1555	0	4	4		
		1650	0	0	0		
			43	95	138	0	0
					106		
					1.301887	people per time	
Notes	Days	visits	times		138		
		40	106	2,3, & 4.	40		
					3.45	people per day	

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0

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Appendix 3 Photos of the May 2015 flooding

Debris around Kiwi Crescent Grill



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Over flow water flowing into Kiwi Crescent



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Neighbours down stream of Kiwi Crescent grill



Lyndhurst Road Below the Rugby Club



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Lyndhurst Road Housing



The rugby club

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The Lyndhurst park grill blocked and stream overflowing



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Flood Level



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Please click on the link below to view the document

https://submissions.wellington.govt.nz:443/Consult24Office/Docs/PID_95/95_11603_JS7EWU_001 Submission to OGBMP Beecroft gbv2.docx

Consult24 Page 1 of 1

Friends of Tawa Bush Reserves Submission
Wellington City Council Outer Greenbelt Management Plan
2019 Review Closing 25 March 2019

INTRODUCTION

The Friends of Tawa Bush Reserves (FOTBR) is an Incorporated Society and charity, established to promote and enhance the conservation of public bush reserves situated between Porirua, Churton Park and Belmont Regional Park, but also to promote the care of bushland in private ownership.

The FOTBR represent a wide range of individual, groups, and corporates that share our goals and objectives.

Our Vision, Goals, and Strategy

The vision of the Friends of Tawa Bush Reserves states “that the FOTBR want to engage the communities help to improve the native bush and wildlife of the Tawa area and that preserving and maintaining this environment is critical”.

The FOTBR strategy is to successfully protect and restore indigenous biodiversity in Tawa where ever possible.

The Group’s goals are to:

- restore the native biodiversity of Tawa’s bush reserves from Porirua to Churton Park and Belmont Regional Park;
- improve ecosystem connectivity between Tawa bush reserves;
- have their endeavours understood and supported by the community;
- improve access to bush reserves in Tawa;
- increase the area of native bush in Tawa that is legally protected;
- and protect the landscape values of the hills that surround Tawa.

The Society also aims to;

- expand the network of tracks and create circuits where possible;
- improve the usability of the connection from Redwood Bush to the Te Araroa walkway/Colonial Knob;
- partner with private landowners to improve pest control, bush restoration and connectivity and;
- contribute to improve water quality.

Background:

The Tawa community have a long history of commitment to the preservation of biodiversity in this region. The community support for the purchase of the Forest of Tawa - Te Ngahere-o-Tawa for the people of Wellington is the most recent example. This OGBMP Review creates the opportunity to see the Forest of Tawa - Te Ngahere-o-Tawa and other adjacent

WCC Outer Greenbelt Management Plan Review 2019, from Friends of Tawa Bush Reserves Inc

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areas of land revegetated to create a diverse ecosystem to include a five tier podocarp forest and the related native fauna; all on the doorstep of Tawa and Wellington.

The Tawa community sees itself as strongly connected in social resilience and main transport and public transport routes, clearly defined geographically by the reoccurring ridge and valley landforms of the area. The Tawa community enjoys the rural outlook and associated walking and cycling activities, all within close proximity to Wellington and Porirua cities.

This proposed revision of the OGBMP provides a key milestone to allow the previous Forest of Tane - now Forest of Tawa - Te Ngahere-o-Tawa, block to be incorporated as part of the OGB and the objectives of the community's desire for its protection to be fulfilled.

GENERAL COMMENT RELATED TO THE OGBMP REVIEW

The following sections are our general comments and also summarise the most significant aspects of our submission.

ABBREVIATIONS

The following abbreviations and Naming conventions referred to in our submission have the following interpretation:

- **OGB** - The Wellington Outer Green Belt
- **OGBMP** - Outer Green Belt Management Plan
- the **Plan** - The proposed Outer Green Belt Management Plan under review
- **FOTBR** - Friends of Tawa Bush Reserves
- **PAP** - The Porirua Adventure Park
- the **Airstrip Block** - the area also known as 944 Ohariu Valley Road
- **Stebbing's Bush** - the bush remnant at the head of the Stebbings Valley adjacent to the Airstrip Block and which is currently fenced from stock.
- **Redwood Bush extension** - The remaining parts of regenerating bush remnants, currently in private ownership, that lie along the western escarpment of Tawa above Redwood Bush, and between the Arohata Block and Spicer Forest.
- **Forest of Tawa** - "Te Ngahere-o-Tawa / Forest of Tawa" being the newly approved name for the recently purchased Forest of Tane block.
- **GWRC** – Greater Wellington Regional Council
- **PCC** – Porirua City Council
- **WCC** – Wellington City Council
- **OSAP** – WCC Open Space Access Plan

WCC Outer Greenbelt Management Plan Review 2019, from Friends of Tawa Bush Reserves Inc

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Continuity of access between OGB areas
<p>FOTBR strongly support that WCC continues to push for continuity of access between OGB areas, and complete the Skyline pathway along the OGB ridgeline to the northern boundary.</p> <p>For the Management Sector 1 this also means that WCC should acquire or otherwise protect, and enable public access to, the privately-owned bush land between Redwood Bush and the Airstrip Block.</p> <p>Further details are proposed in our submission under Section 6.1.1.1</p>
Plantation Forest Harvesting Strategy
<p>The Plan argues for a more proactive management of the plantation forest within the Te Ngahere-o-Tawa / Forest of Tawa block and eastern parts of Spicer Forest (facing Tawa), and a staged methodology for harvesting the plantation trees.</p> <p>FOTBR disagrees with this methodology, and proposes that WCC should not harvest or fell the pines trees on the land between Tawa and the western ridgeline, i.e. the Forest of Tawa and that part of Spicer Forest on the Tawa side of Spicer Forest Road. It should instead allow the well-developed understorey of natives to naturally succeed them.</p> <p>Further details and reasoning behind this strategy are proposed in our submission under Section 6.1.1.4.</p>
58C Kiwi Crescent Entrance
<p>FOTBR supports the Plans proposal for 58C Kiwi Crescent Entrance to become a Secondary category entrance for the OGB, and that new access track links be formed between Kiwi Crescent and the ridgeline. However, the Plan also needs to recognise that this is also a shared ROW entrance with local residents and thus;</p> <ul style="list-style-type: none"> • for safety there ought to be segregated paths for vehicles, walkers and cyclists. • FOTBR opposes any roadway, car park or playground in the Forest of Tawa at the Kiwi Crescent Entrance, rather • FOTBR proposes both a meandering walkway for the less-able and a small arboretum be used for the lower flatter areas of the Forest of Tawa, and • given the impact of public access to the landowners adjacent to the Forest of Tawa Kiwi Crescent track entrance, the Council should consult with them to ensure their access, and agree measures to improve their privacy and security. <p>Further details of our proposed track access network can be found in our submission under Section 6.1.1.6</p>
Cycling and Mana Cycle Group
<p>During 2018 the Friends of Tawa Bush Reserves has had a number of meetings with members</p>

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of the Mana Cycle Group to understand their interests in the cycle track network. We have considered their interest for access from Tawa to the Porirua Adventure Park track network while also preserving the aims of FOTBR for preservation of the indigenous ecology and the tranquil ambience of the bush on the hills above Tawa and where shared access routes may cause conflicts with other users, primarily walkers.

We will continue to work with this organisation to arrive at a mutually agreeable access route for cyclists. However, FOTBR strongly support the stance being taken in the Plan for the focus of cycling in the northern sectors to be on the cycle networks at the neighbouring Porirua Outdoor Recreation Park and the planned PAP, and that therefore the focus of cycling in the northern management sectors of the OGB should be on allowing local access to these neighbouring PCC cycling networks.

Further details are proposed in our submission under Section 6.1.1.6

Upper Stebbings Valley Development Plan

The Outer Green Belt Management Plan review is in parallel with the Upper Stebbings Valley structure plan consultation.

FOTBR THEREFORE SUBMIT that since the Upper Stebbings Valley development neighbours on to the existing OGB area that this Plan also be taken into account for the proposed Upper Stebbings Valley structure plan.

In particular that the following considerations be applied to the Stebbings Valley planning

- a) That a Main Entrance to the OGB track network be planned for at the head of Stebbings Valley, along with the facilities of an OGB Main Entrance; i.e. toilet, drinking water, map board, OGB overview, rubbish bins.
- b) There is a need to make allowance for a "Secondary entrance" to the OGB at a future road crossing of the Marshall Ridge near the top of the Arohata Block, along with the facilities of an OGB Secondary Entrance; i.e. map board and basic OGB information.
- c) That the areas of native bush that are already proposed to be set aside from development as per all of the present Upper Stebbings Valley Scenarios, and that are located between the Airstrip Block and Redwood Bush areas that are already designated part of the OGB, be planned to become part of the OGB in a future review of the OGBMP. This would include the bush areas; (a) Stebbings Bush, and (b) the Redwood Bush extension.
- d) And that as a consequence of (c) that a principle of the OGBMP be held up at least for this section of the Marshall Ridgeline; namely

1. Natural Skylines, undeveloped ridges and hills, and healthy native forests and streams are the foundation of the Outer Green Belt.

The natural values and the relatively natural character of the Outer Green Belt are its essence. The desire to preserve that character and rugged backdrop promoted the Outer Green Belt to be established in the first place. The rugged setting and contact with nature underpin the outdoor recreation and visitor experience now popular throughout the Outer Green Belt. The first consideration

when considering change, use or development will be "how will this affect the natural foundation of the Outer Green Belt".

- e) With this viewpoint in mind therefore **FOTBR also submit** that the road currently shown in Scenarios 2 and 3, running just below and parallel to the ridgeline adjacent to Tawa, be shifted further below the ridgeline on the Stebbings Valley side and with an increased setback from the ridge for any development such that the **Natural Skylines** principle of a future OGB area and the current Ridgelines and Hilltops principle can be preserved. For once it is developed upon it is very unlikely ever to be able to be returned to the Outer Green Belt.
- f) Note that the OGBMP proposes that the Airstrip Block pines are intended to be harvested by WCC before 2025; i.e. ahead of the Upper Stebbings Belt development construction, and this area (partially) replanted in indigenous vegetation, and natural regeneration fostered, with connecting track network between Upper Stebbings Valley and the OGB track network.
- g) There ought to be provision for space for a community garden and/or community orchard area within the Upper Stebbings Belt structure plan area. Preferably not adjacent to native bush remnants – could be within a proposed suburban park or riparian setback area.
- h) There is a need to plan for provision of dog exercise areas when planning for the future reserve network in this management sector.

COMMENTS ON SPECIFIC SECTIONS OF THE OGBMP REVIEW

The following sections are our comments related to specific sections of the Plan.

PART 1 INTRODUCTION

1.1.3 SCOPE

FOTBR notes with disappointment the change of Scope of the OGBMP to represent WCC-owned reserves rather than applying to a Concept Area, as formerly, which covered private as well as public land.

A concept area provided a longer term vision and aspiration for what the Outer Green Belt could become.

A wider area also provided additional motivation for pest control, ecological corridors and ecological protection by the adjacent private landowners as well as WCC.

There is still the need to fill some land ownership gaps and the Plan talks about seeking to acquire or otherwise protect private land where connectivity gaps exist particularly in the northern sectors. If the scope is reduced to exclude consideration of such land, the plan will no

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longer provide an integrated and forward-looking view of land which functions as outer green belt, irrespective of whether it is currently designated as reserve.
1.1.6 WHERE DOES THE PLAN FIT IN
<p>This Section highlights where the OGBMP fits in with the Council's work and the wider Strategic Framework.</p> <p>FOTBR recommends that it may also be worthwhile including mention of other external influences on the OGB Framework, and that this also include the :</p> <ul style="list-style-type: none"> ● Predator Free Wellington ● Te Araroa Trail ● Porirua Adventure Park ● Stebbings Valley Structure Plan (potential future reserves) ● Wellington Town Belt Bill (historic background context for the original Town Green Belt)
PART 2: VISION: WELLINGTON'S WILD GREEN CONNECTOR
2.2 WHY IS THE OUTER GREENBELT IMPORTANT
<p>The proximity of the OGB to the city cannot be overstated as mentioned in this Section. The value of the Open space being so close to urban areas, right at the city's doorstep so to speak, creates an ease of access to extensive green space for recreation or just to enjoy nature without the need for extensive travel. This in itself also benefits the environment and improves the opportunities for wellness without the inconvenience and cost of travel or additional time lost.</p> <p>It also provides habitat close to the city that allows the support of nature, primarily in the form of native birds and other animals, to overflow into the urban backyards and become ingrained as part of the benefits of living in and visiting Wellington.</p> <p>The plan describes the value of, 'the increasing continuity of the reserve land from north to south'. In this context, FOTBR strongly advocate for WCC to acquire or otherwise protect the privately owned bush land at the head of Stebbings Valley, and between the Airstrip Block and Redwood Bush.</p>
2.3 GUIDING PRINCIPLES
<p>FOTBR supports that the Plan contains guiding principles and generally supports those proposed with the following comments.</p> <p>1. Natural Skylines, undeveloped ridges and hills, and healthy native forests and streams are the foundation of the OGB.</p> <p>FOTBR strongly support maintaining the natural development environment of the OGB and</p>

WCC hilltop and ridgelines development minimisation policy.

2. Continuity and Connectivity is fundamental to the OGB concept.

FOTBR strongly support maintaining continuity between OGB areas and enable connectivity between Redwood Bush and Forest of Tawa/Colonial Knob, and the extension of the Skyline Walkway to the north, by either acquiring the land between the areas or by obtaining an easement and protective covenant.

3. The OGB's diversity, of landscape character and outdoor experience, is a strength to be reinforced.

Although FOTBR has made a significant contribution to restoration of native bush in Tawa's reserves, we recognise the enjoyment that many users of the Forest of Tawa have expressed at walking through pine forest with a well-developed native bush understorey. The forest has a more open, spacious feel to it than typical regenerating native bush. The open nature of the pines on the eastern edge above Westhaven allows for panoramic views across the Tawa Basin. We think in the interests of both of diversity, and of maintaining a stable and healthy ecology, that this environment should be left undisturbed as much as possible, rather than removing pines simply on the basis of them being 'exotics'.

FOTBR strongly support the Plan's strategy of having focus activities in different areas of the OGB, and note that we consider horse riding in Spicer Forest, and bikes in the PAP, to be appropriate focal points for these activities. The Forest of Tawa has high ecological value and is mostly on steep terrain, therefore the focus should be primarily on preserving and enhancing ecological and water management value, with recreational activity being confined to key connector tracks. Note that horses and bikes don't mix well.

FOTBR submits that care is needed to ensure that in expanding the range of outdoor experiences possible that this is not at the expense of natural and ecological values.

4. People's enjoyment of the OGB is grounded in being able to escape to wild places with a strong 'Wellington' sense of place.

FOTBR notes that people also don't actually have to visit the OGB to receive or understand its benefit. The contribution provided by the OGB to the green landscape outlook viewpoints and also the spill-over of bird life into the urban areas is a huge value recognised by visitors and residents.

5. Community participation in managing the OGB is enabled and supported.

p16 states that 35 community groups help manage the OGB. FOTBR wonders whether it would be desirable that a lead community restoration organisation be appointed for each Sector as the key stakeholder with WCC; e.g. Makara Peak Mountain bike group for the Makara Peak Sector; and FOTBR for Management Sector 1. This would seem to have the benefit of better coordination and a reduction of conflicting activities being undertaken within Sectors.

2.3.1 HOW WILL THE VISION BE APPLIED

FOTBR supports the principle for indigenous vegetation restoration of the flanks and valleys and maintaining an open character of the ridgelines for recreation.

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PART 3. DESCRIPTION / KEY VALUES
3.2.1 PAST ECOSYSTEMS AND LAND USE
<p>As the Plan points out there are few remaining remnants of the original indigenous forest and therefore “Protecting remnants, with their seed sources, was a critical starting point from which to begin restoring Wellington’s ecosystems.”</p> <p>FOTBR therefore submit that protection of the remaining remnant and key seed source trees, and their surrounding regenerating buffer zones, should receive the highest priority within the OGBMP.</p>
3.2.2 NATURE TODAY
<p>The Plan notes the values and role that the OGB plays in being a continuous ecological corridor.</p> <p>FOTBR submit that OGB should be considered</p> <ul style="list-style-type: none"> a. as part of an even more extensive corridor that also continues north through Colonial Knob / Porirua Scenic Reserves, to Titahi bay and Whitireia Park and on to Mana and Kapiti Islands. b. that the WCC consider extending the current plan to include an ecological corridor that run east of the Stebbings Valley and the Tawa Reserves, through Grenada North Park to link with the Belmont regional Park. c. that the OGB could also be considered as a buffer for pest control between Wellington’s rural hinterland and the urban backyard predator free areas.
3.3 LANDSCAPE
3.3.1 TODAY’S LANDSCAPE
<p>FOTBR agrees that “The relative absence of built development on the OGB is important to its character and urban containment role”.</p>
3.3.2 LANDSCAPE EXPERIENCE
<p>FOTBR agrees that the feeling of a remote natural experience and quiet tranquillity surprisingly close to the city is an important feature of the OGB.</p>
3.3.3 CONTINUITY AND URBAN EDGE
<p>FOTBR reiterate that locally to Tawa the OGB is a highly visible part of the suburbs distinctive character. It defines the western edge of the suburb and provides a green landscape outlook that residents value highly as a reason for living in the suburb. This should also apply to the eastern hills ranging to the Belmont Regional Park.</p>

3.4 CULTURE AND HERITAGE
3.4.2 PUBLIC UTILITIES / INFRASTRUCTURE
<p>In respect to <i>Water services</i> ...</p> <p>FOTBR wish to also have noted that just beyond the OGB area to the north the catchment to the east of Colonial Knob has also been used as water catchment areas for parts of Porirua. And that the emerging springs and streams from the western slopes of Tawa have in the past been recognised as a potential emergency water supply.</p>
3.4.3 PEOPLE AND COMMUNITIES
<p>FOTBR SUBMIT that the Tawa Historical Society should be consulted as a stakeholder for information with regards to local place names and identities for the northern Management Sectors 1 and 2; e.g. the locality name for Lindenvale area not only came from the name of the local farm of Charles Duncan of "Linden Vale", but this in turn was named after the Linden tree copse in Kew Gardens (aka <i>Tilia</i> species (lime trees)), where Charles once worked as a gardener. Consultation with local Maori Iwi on local place names is also important so that representation of our joint ethnicities is considered.</p>
3.5 RECREATION AND ACCESS
3.5.1 WHAT DO PEOPLE DO ON THE OGB
<p>FOTBR recognise the vision of the OGBMP to allow diversity of recreational activities on the OGB. And we support the concept that certain specialist activities may be restricted to or be the focus of specific Management Sector areas.</p> <p>FOTBR agree with the view of the survey that walking is the most common activity in the OGB.</p> <p>FOTBR SUBMIT that camping and drone flying in the OGB are not appropriate to the more tranquil areas of the northern Management Sectors and other areas that may have a high volume of users or be close to residential areas.</p>
3.5.2 WHERE DO PEOPLE GO
<p>FOTBR SUBMIT that Te Araroa Trail and Colonial Knob (and in future the Skyline Walkway and PAP) are regionally significant destinations. With the acquisition of the Forest of Tawa, people are now easily able to access these destinations via the track from Kiwi Crescent, and via any future connection from Brasenose Park.</p>

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<p>PART 4 GENERAL OBJECTIVES AND POLICIES</p> <p>4.1 LAND ADMINISTRATION</p> <p><i>4.1.2.1 - Reserves classifications, land acquisitions and management mechanisms</i></p> <p>Consistent with the proposed policy, FOTBR advocate for the purchase of the area of bush between Redwood Bush and the Airstrip Block (which we've called the Redwood Bush extension), and the area of bush at the head of Stebbings Valley adjacent to the Airstrip Block (which we've called Stebbings Bush).</p> <p>FOTBR support the position of the OGBMP that all WCC land areas within the OGB be classified as Scenic Reserve.</p> <p>FOTBR advocate that for the OGBMP to succeed with its vision then Councillors' will also need to support the Plan through funding allocations in the WCC Long Term Plan to support the ACTIONS of the OGBMP.</p> <p><i>4.1.2.3 - Relationship with overlapping plans</i></p> <p>FOTBR notes that the Plan states that "where any policy in this Plan is in conflict with a policy in overlapping management conservation or master plan, then the most recent policy will take precedence and provide guidance for the next review of the older plan".</p> <p>FOTBR believes that this will cause some confusion and a lot of work trying to maintain tracking of management policies across a wide range of plans, and risks unintended consequences when updating plans when the effects it may have in superseding a range of other plans are not adequately considered. Surely there should be a hierarchy of Plans and this hierarchy defined in the OGBMP; e.g. the District Plan takes precedence; the OGBMP defines policies for Specific Management Plan Sectors, with reference to other more specialist plans for specific aspects (e.g. Dog Policy for defining dog recreation areas and dog handling when in reserves, and Play Ground Policy for the allocation of playgrounds, and the Open Access Plan defines design of tracks and general principles in selecting track routes).</p> <p>4.2 NATURE</p> <p><i>4.2.1 Objectives</i></p> <p>FOTBR strongly support the objective that "Being close to nature is a point of difference for Wellingtonians."</p> <p>And the objective "To restore and protect a continuous ecological corridor along the OGB, ... taking into account opportunities to enhance ecological connections beyond the OGB".</p> <p><i>4.2.2.1 Caring for Nature</i></p> <p>FOTBR supports the priority being given to protect the areas of high ecological value, and buffers around them, and to manage the intervening areas to optimise conditions for natural</p>

regeneration.

4.2.2.2 *Streams*

FOTBR supports the focus of protecting and restoring the freshwater ecology in the stream catchments of the OGB and the buffer zones proposed, although **FOTBR believes** that the harvesting of logs in the Forest of Tawa as proposed by the Plan will significantly impact the freshwater ecology of the streams that run through this area and no amount of best practice is going to prevent this impact.

4.2.2.3 *Indigenous flora and planting*

There is a substantial under-storey of regenerating native bush beneath the pine forest in the Forest of Tawa. Left to itself, **FOTBR believe** this will naturally succeed the pine trees as they die and fall, and avoid the need for costly large-scale re-planting. We have seen evidence of this where storm damaged trees have fallen and have been overgrown by native bush.

4.2.2.4 *Wildlife*

FOTBR submit that there should also be proactive monitoring and suitable habitat creation for native bats to enable this mammal to be reintroduced into the Wellington area via the OGB.

FOTBR supports that there should be periodic monitoring of wildlife including birds, lizards, freshwater fish and also insects in the OGB through surveys and monitoring so that a baseline knowledge of what's there can be used to confirm trends over time of the effects of further restoration or increased usage.

FOTBR supports the preservation of old tall exotic pine trees to create wildlife habitat. It is known that many native bird species enjoy the viewpoints from tall trees and in the Forest of Tawa area tui and kereru are frequently found in the Forest of Tawa for this reason, as do NZ Falcon. And in the future it is hoped that the Forest of Tawa pines may also become habitat for kaka and native bats.

4.2.2.5 *Weeds and pest animals*

FOTBR SUBMIT that this section should be extended to also include pest birds; e.g. magpie and rooks.

FOTBR SUBMIT that the requirement to "Work with GWRC to implement statutory and strategic weed and pest animal management on the OGB" is a very weak requirement that in reality has not teeth or funding. WCC are better off coming up with their own management strategy and seeking assistance from GW where this aligns with their strategy.

FOTBR support the requirement for collaboration with Predator Free Wellington, recognising that in future the OGB would become a buffer zone for pest management between the rural and urban areas of Wellington, and prevent the re-infestation of pests into the Urban areas where there are currently Predator free groups operating in every suburb of Wellington.

FOTBR SUBMITS that *Tradescantia* should be added to the list of priority ground covers as it is

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so hard and discouraging for volunteer groups to attempt to control.

4.2.2.6 Fire

FOTBR object to the wording and actions outlined in this section and the related clause 5.3.3.1 Activities that are specifically prohibited: Bullet point 2 “open fires”.

The reasons are because:

- 4.2.2.6 is unclear to ratepayers,
- there is no stated fire management plan for the large vegetated areas of the OGB,
- the area should include identified and published fire breaks to meet the requirements identified by Fire and Emergency New Zealand, (for example, the Spicer Forest Road could be intentionally seen and managed as a fire break, and, the ridgeline areas where the vegetation is pasture, and which can become rank grass in summer, may also need to have managed fire breaks).
- the close proximity of houses to the OGB put these house at risk and these high risk areas should be identified and either, the area, or each household, have a fire management plan as recommended by Fire and Emergency New Zealand.
- The character and impact of planting fire resistant species in areas of high fire risk should be specified especially in the existing high risk areas of pine plantations, and this practice ratified by Fire and Emergency New Zealand.

4.2.2.8 Resilience – ecosystem services

FOTBR suggests investigating registration of Redwood Bush and Forest of Tawa as carbon storage forests.

4.3 LANDSCAPE AND LAND USE

4.3.2 POLICIES AND ACTIONS

4.3.2.3 Plantation Forestry

FOTBR OBJECT to the proposal for staged harvest for selected blocks of Forest of Tawa and eastern Spicer Forest areas in Management Sector 1, as further explained under Section 6.1.1.4.

4.5 RECREATION AND ACCESS

4.5.2 POLICIES

4.5.2.3 Track Network

FOTBR strongly supports policy 2 a. completion of the Skyline Track as a continuous shared track following the Ohariu ridgeline.

FOTBR SUBMITS in support of policy 2 b, that formalising and upgrading the existing lateral

Redwood Bush to Forest of Tawa track, will provide a connection to the Skyline Track from Redwood, and a large loop walk in the western hills of Tawa (none currently exist). Further details of our track proposals for Management Sector 1 can be found under section 6.1.1.6.

FOTBR OBJECTS to policy 3, to “Manage all tracks in the OGB as shared foot and bike-based use unless otherwise specified in the OSAP or this Plan” as it is unclear to the OGBMP reader what is included in the OSAP; e.g. Tawa bush tracks are already currently managed for walkers only. And where in the Forest of Tane a cycle track is required FOTBR has proposed segregated track use, largely for safety and enjoyment of experience of the user.

Shared use tracks need to have specific stricter design guidelines attached to them that include specifications for gradient, sight-lines and width.

Further details of our track proposals for Management Sector 1 can be found under section 6.1.1.6

FOTBR strongly supports the explanation that while “the OGB is large and can accommodate a lot of tracks, but is not possible to cater for all the specific user needs everywhere without compromising natural values and/or the expectations of other user groups”. Presumably this also implies that compromising natural values is not a viable alternative.

Future Track Proposals Map p 90. 1. Kiwi Crescent to ridgetop, separate walking track and mountain biking connector route to the PAP.

FOTBR submits that the Future Track Proposals Map should include a link from Redwood Bush to the Forest of Tawa, even if this requires an easement across private land.

4.5.2.4 Entrances, amenities and way-finding

FOTBR submits that the following entrance points be considered for the northern Management Sectors 1 and 2.

- A Main Entrance at the head of Upper Stebbings Valley.
- A Secondary entrance at 58C Kiwi Crescent.
- A Secondary entrance at Brasenose Park.
- A Track node at the head of the landfill (junction of Spicer Forest Road, Forest of Tawa access and Colonial Knob destination track),
- A Track node on the Airstrip Block (junction with Te Araroa/Skyline Track, Upper Stebbings access and 944 Ohariu Valley Road access)
- Tertiary entrances from Chastudon Place, Peterhouse Street, Achilles Close, and a future Marshall Ridge access road.

4.5.2.5 Dog Walking

FOTBR supports policy 2, to “Inform dog-owners prominently of the need to keep dogs on leash at all times in the OGB unless in a designated dog exercise area”.

However, the experience of FOTBR indicates that this requirement to keep dogs on leash doesn't work as there is very little awareness and no perceived enforcement. It is unclear from

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the OGBMP how enforcement proposed to be managed?

FOTBR SUBMITS that it has received feedback from users of some parents having stopped taking their children on tracks in Redwood Bush, due to sudden encounters with large, unleashed dogs.

There are currently no dog exercise areas adjacent to the OGB in the northern management sectors 1 and 2.

Until these issues are resolved a temporary ban on dog walking in the OGB might be considered.

4.5.2.6 *Organised outdoor events and programmes*

FOTBR supports outdoors recreations events where these encourage use of the established facilities and tracks; e.g. near Tawa there are the Tawa Hash Harriers trailing through the area.

However, activities that tend to encourage off-track use; e.g. orienteering events and geocaching could become a problem and negate some restoration and riparian protection measures and become a safety risk for users in hazardously steep terrain areas.

PART 5 RULES FOR USE AND DEVELOPMENT

5.3 RULES – POLICES

FOTBR submits that the OGBMP needs a policy to enforce prohibitions. At present, there is a problem in Tawa with dogs off leashes on bush tracks, and dangerous use of bikes and motorbikes, and even off-road motorbikes on bush tracks where they're prohibited. The prohibitions are ineffective because they're not enforced, and because there are no conditions (such as styles, barriers and connecting step-ways) to discouraged non-compliance.

5.3.1 ALLOWED ACTIVITIES

FOTBR suggests that alongside orienteering, probably should also include geocaching which is already happening at a low level.

5.3.1.1 Some restrictions may also be placed on allowed activities

FOTBR SUBMIT that it is unclear how people are expected to know about these restrictions or how to seek exemption.

5.3.2 MANAGED ACTIVITIES

5.3.2.5 Public Notification

FOTBR notes that Managed activities will generally not be notified, and suggests that perhaps there could be a system of notifying the local Management Sector key stakeholder care group so they may be aware as the local 'eyes and ears' of Council of a pending activity.

5.3.2.6 Information required with an Application

FOTBR suggest that this section be included within section 5.3.3.2 dealing with applications.

5.3.2.7 Decision-making guidelines

FOTBR notes that the decision-making guidelines appear not to include anything that takes into consideration the use strategy for specific management sectors and suggest that this be included.

5.3.2.9 Utilities

5.3.2.10 Public Utilities

5.3.2.11 All public and private utilities

FOTBR suggest that sections 5.3.2.9, 5.3.2.10 and 5.3.2.11 be combined under the one section 5.3.2.9.

5.3.3 PROHIBITED ACTIVITIES ON THE OGB

FOTBR SUBMIT that the use of drones be added to the list of prohibited activities in rule 3. Drones should not be used in Management Sectors where the primary enjoyment is quiet tranquillity of walking with nature and relatively close to built-up residential areas. Drones also have the potential to disturb nesting bird life.

PART 6 MANAGEMENT SECTORS

6.1 SECTOR 1: TE NGAHERE-O-TAWA / REDWOOD

The title of this sector was previously known as the SPICER SECTOR. This was an unambiguous and well understood name for this sector albeit that the sector also included parcels outside of the Spicer Forest; notably the Airstrip Block, Redwood Bush and the Tawa Bush Reserves (above Chastudon and Fyvie Ave) - as shown on the map on page 98.

The proposed Title for Management Sector 1, and along with other usage in the Draft Plan, implies that the name of the entire area of "Spicer Forest" is planned to be supplanted by name of "Te Ngahere-o-Tawa / Redwood" which also conveys the implication that Redwood is the English equivalent for the te reo Ngahere-o-Tawa. This, in our view, creates confusion and makes it unclear what area is being referred to by this name (the sector, Spicer Forest, or the original Forest of Tane) and makes it unclear how the original Forest of Tane block should henceforth be referred to.

When FOTBR originally put forward the name of "Te Ngahere-o-Tawa / Forest of Tawa" to Council it was intended as an alternative to the archaic name of "Forest of Tane" and to apply

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to this parcel only and not the entire area of Spicer Forest.

The reason for this was:

- to provide recognition to the Tawa community who provided overwhelming support to the campaign for the Forest of Tane block to be purchased by WCC for the local community enjoyment.
- to provide recognition of the important reasons behind the purchase of the block to prevent its development and to retain the forest vegetation cover; to protect the catchment headwaters and minimise downstream flooding for a significant tributary that has caused flooding in the past, to minimise further sedimentation of the downstream catchment and the Porirua Harbour, to improve the water quality of the catchment headwaters as an ecology for freshwater aquatic life, and to provide an additional recreational access point for the local community to the Outer Green Belt and the Porirua Outdoor Recreation Park beyond.
- to provide recognition of the important indigenous bush remnant in this block that also includes a stand of tawa trees.

FOTBR therefore SUBMIT

1. that the Title for the Outer Green Belt management sector 1, revert to its previously known name of SPICER,
2. that the name of "Te Ngahere-o-Tawa / Forest of Tawa" be retained for the parcels of land previously known as the "Forest of Tane" and used throughout the Plan for this purpose. However, we will concede that for ease of management this name could also apply to that portion of the Spicer Forest that lies to the east of ridgeline and within the catchment of the Porirua Stream, rather than the catchment of the Ohariu Stream or Mitchell Stream. The reasons for this are:
 - The forest on the Tawa side is contiguous, will be managed as a single block, and will be included in the Friends of Tawa Bush Reserves MoU with the Council,
 - The forest on the Tawa side is visible from and identified with Tawa (The Forest of Tawa) - the forest on the west side is not; and Spicer Road forms a clear physical boundary between the two areas,
 - The forest on the Tawa side is identified by Tawa residents as the block of land they were united in seeking Council protection for.
3. That where the te reo name Te Ngahere-o-Tawa is used that it is also used in conjunction with its English equivalent as in "Te Ngahere-o-Tawa / Forest of Tawa"; e.g. where reference is made to Colonial Knob the Plan uses both te reo and English names together; i.e. Rangituhi / Colonial Knob.

It should be noted that the title of the image needs correcting – the referred Airstrip block is centre left, not centre right.

Under "Key feature / Values" - FOTBR suggests the following be added

- Quiet solitude of walking only bush areas
- Conservation of important indigenous remnants
- Northern sector seed source and corridor linkage further north.

Under Local Communities of interest :

- add Churton Park and Upper Stebbings Valley,
- delete duplication of Ohariu valley

Under Current volunteer / community group activities :

FOTBR SUBMITS

1. that consideration be given to naming the local community groups that are currently involved in each Management Sector, and perhaps nominating a lead care group. Not only does this identify those groups that might have a vested interest as a stakeholder for future discussions concerning management of the sector, but also provides a linkage for members of the local community who may be interested in becoming more involved in some way.
2. that track maintenance and seed collection be added as activities undertaken by community volunteer groups.

6.1.1 OVERVIEW

The Overview describes the area of this Management Section and notes that “the southern boundary has been adjusted so that all of the area likely to be directly affected by the forthcoming Upper Stebbings Valley structure plan is included in sector 2”.

It is inherently likely that the outcome of the Upper Stebbings Valley Structure Plan planning process will be that the existing remnant bush areas at the head of the Stebbings catchment that border on the Airstrip Block (944 Ohariu Valley Road), and those on the eastern Tawa escarpment above Redwood Bush (between the Arohata Block and Spicer Forest), will be designated as open space reserves and that in time at the next OGB review should expect to be added to the Outer Green Belt. FOTBR have also had an historical interest in these areas and have undertaken pest management for the wider Redwood Bush KNE area since about 2005.

FOTBR THEREFORE SUBMITS

1. that the boundary between Management Sector 1 and Management Sector 2 revert to its previous definition and as schematically illustrated in the Management Sector 1 map on page 98; i.e. that the sector 2 boundary is south of the airstrip block and south of the Arohata Block on the Marshall ridge.
2. that the bush remnant areas of the Redwood Bush extension and Stebbings Bush, that are contiguous with the existing OGB Management Sector 1 bush and plantation areas, should also be included in Management Sector 1, and not in Management Sector 2

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3. that the proposed boundary would then also conveniently divide landscape management into Management Sector 1 being primarily regenerating bush and plantation areas and Management Sector 2 primarily being areas of open pasture.

6.1.1.1 Land Administration

The Plan notes that there is a distinct lack of connectivity between Management Sectors 1 and 2, and that future access might be achieved through reserve allocations in the Upper Stebbings Valley structure planning process but in the meantime seeking right-of-way access across intervening private land is an option, even if on a temporary basis.

FOTBR strongly support and urge WCC to seek right-of-way access across intervening private land as an interim measure to allow authorised public access which is already informally occurring. This would provide the final piece of the puzzle to enable a 2.5 hour loop track through the reserves on Tawa's western hills, between Brasenose Park and Kiwi Crescent, as well as enabling access from Redwood to Colonial Knob and Te Araroa. The prospect of a loop track was presented to the community and to Councillors as a key benefit of buying the Forest of Tane.

FOTBR also strongly support completion of the Skyline walkway between Management Sectors 3 and the northern boundary with PCC. This would enable a larger catchment of both walkers and cyclists to access the future PAP development directly from other Wellington suburbs.

6.1.1.2 Nature

The Plan notes that little remains of original tall canopy trees. And thus the few remaining scattered island remnants of Redwood Bush, Forest of Tawa, Westwood and Chastudon / Tawa Bush Reserves have an even more heightened importance in providing valuable seed sources for future ecological restoration in the northern suburbs, and provide an important part of the OGB ecological corridor, and stepping stones for dispersal of birds to other green areas across the Porirua Stream valley.

FOTBR THEREFORE SUBMITS that it is vitally important that protection of these remnants is given the highest priority and not put at risk from potential overuse by more aggressive activities.

FOTBR also wishes to highlight the importance of a few single rimu trees within the headwaters of the Upper Stebbings Valley and their being the sole seed source of this species in the northern suburbs.

The Plan notes that - *"Limited contracted weed control has been undertaken in this sector."*

FOTBR wishes to also have acknowledged the significant volunteer hours have also provided weed control in this Sector over the past 15 years in Redwood Bush and more recently in Forest of Tawa.

The Plan notes - *"Of particular concern is the spread of wild cherries"*. This is of particular

concern along the western Tawa escarpment including in the Tawa Bush Reserves, Westwood and Forest of Tawa. The scale of this infestation is beyond the control of volunteers as chainsaw use is required.

FOTBR therefore recommends that a specific ACTION be added for this Sector (Under Weeds and animal pests) to "Develop and execute a plan to control wilding cherry trees to protect native regeneration."

The Plan notes that - "Pest animal control is carried out by community volunteers supported by the GWRC."

GWRC has also supported FOTBR in undertaking pest animal control in the wider privately owned regenerating bush areas originally known as the Redwood Bush NE area, over the past 15 years.

The Plan notes that - "WCC have planted some 13,000 native plants in this sector since 2004, and volunteers have also done restoration planting over many years.

FOTBR notes that it has planted an estimated 15,000 trees in Tawa over the past 15 years and a number of these have been on the fringes of Redwood Bush.

FOTBR strongly supports the commentary that - "*Catchment management is important here, particularly in relating to managing the exotic forest plantations. Several small streams on the east side drain into the Porirua Stream and, ultimately, Porirua Harbour, where sedimentation and water quality are big issues. ... Maintaining long-term vegetation cover in the stream catchments will help to improve water quality and assist with flood control by reducing and slowing runoff.*"

FOTBR SUBMITS that these are important reasons behind the community support for the purchase of the Forest of Tane block, and support our response elsewhere to minimising the logging of the plantation forest.

FOTBR SUBMITS that there is little acknowledgement given of the value of the tall plantation pine trees as a habitat for wildlife. It is known that many native bird species enjoy the viewpoints from tall trees and in the Forest of Tawa area tui and kereru are frequently found in the Forest of Tawa for this reason, as are NZ Falcon and Kakariki. And in the future it is hoped that the Forest of Tawa pines may also become habitat for kaka and native bats.

6.1.1.3 Landscape and land use

The Plan notes that - "The ridge ... is an important visual backdrop to the nearby suburbs."

FOTBR SUBMITS that the green western escarpment outlook is a valued landscape value for Tawa residents, it contributes to the identity for Tawa as a suburb, and provides the reason behind many Tawa residents choosing to live in this suburb. It conveys the sense of living in a rural outlook while also being quite close to the amenities of the central city.

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The Plan notes that - "The dominant land cover is mixed forest, comprising some important remnant native forest, pine plantations and the regenerating native bush in Spicer Forest, Te Ngahere-o-Tawa and Redwood Bush.

FOTBR SUBMITS that mention should also include the "Westhaven Reserve" and "Tawa Bush Reserves" as well as the regenerating native bush remnants on adjoining private lands which are potential future additions to the OGB (i.e. Stebbings Bush and the remainder of the Tawa western escarpment above Redwood Bush).

The Plan notes that - "Structure planning of the area is currently underway and is likely to include a future road connecting Redwood and Churton Park."

FOTBR SUBMITS that that this sentence should be deleted from the plan as it is contentious and road options have still to be fully considered by the Structure Plan process. It is later mentioned "That new road networks could increase and improve access to the OGB reserves", and this should suffice for the intended purpose for this Plan.

Strictly, under the proposed Management Sector boundary descriptions, the last paragraph of this section belongs under Management Sector 2. However, **FOTBR submits**, as per the earlier comment on the Sector boundary at this point, that these Stebbings Structure Plan aspects rightly belong under Management Sector 1 as per the current Draft Plan.

6.1.1.4 Forest Plantations

Spicer Forest and Forest of Tawa

The Plan argues for a more proactive management of the plantation forest within the Te Ngahere-o-Tawa / Forest of Tawa block and eastern parts of Spicer Forest (facing Tawa), and a staged methodology for harvesting the plantation trees. The argument rests heavily on the cost of clearance of windfall pines and commercial weed control amongst windfall pines.

However, FOTBR disagrees with this plan approach and wishes to propose an alternative plantation management plan for this area - for the plantation pines on the slopes facing Tawa.

FOTBR submits that the plantation pine forest land between Tawa and the western ridgeline be left intact, to allow the existing well-developed understorey of native species to naturally succeed the pines.

Reasons:

1. The original rationale presented to the Council by FOTBR for the purchase of the Forest of Tawa was to protect its ecological, recreational and water management value. Felling the pines is unnecessary, and will compromise each of these values. The Forest of Tawa and the contiguous area of Spicer Forest to the east of the ridgeline (and unlike the areas west of the ridgeline), have the advantage of a significantly advanced understorey of regenerating natives. FOTBR's experience is that away from the forest

- edge, land where trees have fallen over has been revegetated by this understorey of native species rather than by weeds.
2. In addition, FOTBR experience with the Airstrip block thinning is that slash is completely rotted away inside 10 years and there have been minimal serious weed infestations, despite the relative lack of a native understorey compared with the Forest of Tawa. This reinforces our view that natural tree fall will not result in a significant weed issue in the Forest of Tawa/Spicer Forest.
 3. Harvesting or staged mass felling of the pines on land above Tawa will significantly increase the erosion of the hilly lands, which will increase sedimentation into streams, and cause a loss of stream ecology and water quality, conditions identified by Landcare Research for these types of land.
 4. Staged mass felling the pine trees will also significantly increase rainfall runoff rates and put Tawa at risk of flooding like, or worse than, the Tawa flood of May 2015.
 5. Furthermore, natural succession avoids the disruption to access and enjoyment of the forest that would occur over the period the trees were to be harvested.
 6. The current character of this forest - exotic pines with a well-developed native understorey at eye-level - is a point of difference, enjoyed by residents, and consistent with the OGB's guiding principle of diversity of landscapes.
 7. Natural succession avoids the significant risk of major erosion if trees are felled and harvested in large numbers on these unstable hilly and steep slopes. (Landcare)

We accept that over time it is estimated that on average 10% of the plantation pines may become damaged due to storms and become windfall. However, this has already been occurring in this forest over the past 20 years with little evidence of serious weed infestation within the area of pine plantation. The vast majority of pest weed infestation has been along the single track and adjacent to residential properties due to garden escapes.

We have also been through the experience of reopening the Forest of Tawa track following the purchase of the block after earlier storm damage. There were half a dozen trees affecting the track and these were relatively easily either cut and removed to the side of the track or the track re-routed around obstacles. An advantage of Forest of Tawa also is that there is not a proliferation of tracks - so that most tree fall would not affect the track network and is away from public accessible areas.

Furthermore, rather than having to wait for a subsequent generation of colonising species to become established and create shade and shelter **FOTBR submits** that podocarp species could be planted directly within the existing light wells amongst regenerating areas where pines have not been planted or previously fallen. This would perhaps save a decade of time in the native forest restoration.

The experience of the clearance of the pine trees below Countdown on Takapu Road (Willowbank Reserve), and also along the Spicer Road, gives us great examples of what happens when an opening is made into pine forest. It just causes the next level of adjacent weaker pines to also collapse and become windfall.

FOTBR submits that clearing any trees from the forest edge will simply shift the problem of windfall further and further into the forest. A better solution is to plant a buffer zone of

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natives beyond the edge of the forest. When and if more trees fall on the forest edge, there will already be established natives growing beside where the tree has fallen, and these will spread over the top of the fallen tree and restore a canopy. Margin planting can use low cost, quick growing pioneering bush like *Coprosma robusta* which can successfully compete with gorse, and attracts birds which will disperse the seed of other native species.

The same will also apply to the proposed riparian vegetation that is proposed to be left along the streams to minimise runoff and sediment from cleared areas, negating this important aspect of sediment runoff and flooding mitigation.

Furthermore the land structure in the centre of Forest of Tawa is so steep that any activity will put the whole landscape at risk. FOTBR believe that much of the steeper slopes and valleys of Forest of Tawa contain solifluxion debris and other forms of mass movement eroded from the higher slopes. This geological phenomenon is also common in the Belmont Regional Park area. It acts like a scree and as such it will be extremely unstable and should be disturbed as little as possible.

[The reference at http://rsnz.natlib.govt.nz/volume/rsnz_82/rsnz_82_05_011240.html goes some way to describe the solifluxion phenomenon in Wellington area, this should also be considered and linked to general mass movement erosion in the area.]

It is claimed that the revenue from the pine harvesting will help offset the cost of revegetation of the cleared areas. However, WCCs own arborist team admit that any past pine harvesting has not proven to be cash positive. The Forest of Tawa and Spicer Forest trees have not received adequate thinning or pruning and are largely firewood grade and thus only a limited number of trees would yield any length of millable timber. This then also raises the question of "what happens to the remaining slash"? Whether removed or left to rot, either option presents a huge potential environmental risk. This business case has yet to be tested and proven and requires more work to prove viability. If this funding model is not proven prior to proceeding with this strategy it puts the revegetation programme at risk and further undermines the values of the area, while destroying a generation of regenerating understory.

The proposed staged clearance strategy also hasn't taken into account the effect of a local dedicated volunteer army. The FOTBR have a proven record over 15 years of being able to take on the challenge of maintaining pest animal and pest weed control as well as infill restoration planting. The Forest of Tawa also provides an opportunity to engage with the local community at a new level and get community buy-in on an even larger scale to support the project that they gave their support to in the purchase of the block.

FOTBR therefore SUBMIT that, in the forest to the east of Spicer Road, the plantation pines are left intact, as the natives will succeed them. Furthermore, natural succession avoids the disruption to access and enjoyment of the forest that would occur over a period of years if the trees were to be harvested. The character of this forest - exotic pines with a well-developed native understorey at eye-level - is a point of difference, enjoyed by residents, and consistent

with the OGB's guiding principle of diversity of landscapes.

Finally, natural succession also avoids a significant risk to the major values and reasons for retention of the block in the first place namely :

- erosion and downstream increased sedimentation if trees are felled and harvested in large numbers on these steep slopes of doubtful stability.
- reduced water quality due to riparian disturbances, loss of vegetation to slow the runoff.
- increased risk of downstream flooding events.
- loss of public access during forest harvesting operations.

6.1.1.5 Culture and Heritage

It is noted that the OGBMP makes mention of stories for this sector including: Duncan family farm at 'Lindenvale', conservation history, the 'military tracks', plantation forestry, and local community's advocacy for purchasing Forest of Tawa to protect its natural and potential recreational value.

FOTBR Submit that there also should be added;

- the local farming history associated with the naming of Spicer Forest; and
- as also included in Management Sector 2 the "Need to work with mana whenua and local history groups to find out about places or values of interest in this sector."

FOTBR recommend that the Tawa Historical Society and mana whenua be included among the local history groups when time comes for consultation about places or values of interest in this sector, and associated information panels or online references.

6.1.1.6 Recreation and Access

FOTBR suggests that, with regards to the existing tracks confined to Redwood Bush and the Army track from Brasenose Park to the Ridgeline, that acknowledgement be given to the work of volunteers in opening and maintaining these routes from the early 2000s.

It is noted in the OGBMP the important context of the wider 550-acre grouping of contingent reserves in the north of the OGB area, which with the adjoining PCC reserves including Colonial Knob which, in 2016, led to the Porirua Outdoor Recreation Park Development Plan.

There has also been the subsequent announcement of the \$21m Porirua Adventure Park proposal including a gondola development and zip-line, and an extensive walking and cycling track network. This development proposal is forecast within four years to see 350,000 visitors per annum to this area. And if even only a small percentage of these overspill into the OGB areas - this is going to bring about a huge increase in visitor numbers to the OGB.

With the purchase of Forest of Tawa **FOTBR agrees** that there is a community need for a formalised access from Kiwi Crescent to the ridgeline to link with the Te Araroa walkway and to the PAP recreation areas beyond the ridgeline.

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FOTBR agrees with the Plan's view the focus of the biking community should be on the neighbouring PAP area and it's therefore not necessary to have an extensive network of cycle trails within the OGB Management Sector 1, rather a bike connector route from the adventure park to Tawa should be proposed.

Walking and Cycling Tracks through the Forest of Tawa

FOTBR wishes to submit the following proposal for walking and cycling tracks through the Forest of Tawa between Kiwi Crescent and Spicer Road.

The current track through the Forest of Tawa from Kiwi Crescent to Spicer Road is a popular walking track. It is a beautiful walk, with ridgeline panoramic views up and down the Tawa valley. This track also provides a valuable direct connection to Te Araroa (the national walkway) and Colonial Knob. The track has been described as a 'family track'. However, it is steep enough to deter the elderly, the less abled, and the very young from walking the current track, and uphill cyclists.

General Proposal for Tracks

FOTBR proposes that within the Forest of Tawa between the end of the Kiwi Crescent Right of Way and Spicer Forest Road, tracks should be limited to just three, to be used as follows:

1. A track for fit able walkers.
2. A track for the less able people such as those with disabilities, older people, or those with little children.
3. A downhill only track for cyclists.

Reasons and Track Use Description

1. The current track is used by fit able walkers to both ascend and descend the walkway.
2. Mountain bikers only use the track as a very fast-downhill descent into Kiwi Crescent, because in substantial parts it is too steep and narrow for uphill cycling.
3. Unless cyclists are separated from walkers, it's only a matter of time before a serious injury occurs. Older people who have encountered cyclists coming downhill towards them report feeling uncomfortably and vulnerable. FOTBR is receiving increasing reports of near misses.
4. Residents also have vehicle right of way over the ROW entrance from Kiwi Crescent and there are already many incidents of passageway conflict between residents' vehicles, cyclists and walkers.
5. The FOTBR reiterates, it is only a matter of time before the confluence of activities in the current Right of Way results in an accident.

Note: FOTBR submits that walkers of all ages should be able to walk public tracks without fear of cyclists or resident's cars running them down.

Track Proposal One - Access down the Right of Way

FOTBR strongly requests that there be at least two separate access ways down the Right of

Way from Kiwi Crescent to the entrance of the Forest of Tawa. This would require the widening of the existing road and:

1. A paved driveway for use by cyclists and residents' vehicles, south side of the entrance.
2. A paved separate walkers' path, on the north side of the right of way entrance.
3. Physical separation of the two access ways.

Track Proposal Two – Beyond the Right of Way Entrance

Beyond the Right of Way entrance, FOTBR proposes two separate tracks to connect to Spicer Forest Road, one for cyclists and one for walkers:

1. The existing forest track becomes part of two new tracks – the lower section incorporated into a downhill only track for cyclists, the upper section into a path for walkers.
2. Cyclists are catered for by a downhill only track comprised of a new track from Spicer Forest Road, eventually connecting to the existing forest track approximately 420m below the farm gate. The track is downhill only, because the steep parts of the existing forest track are too steep, narrow and long for uphill cycling, and where the grade lessens the track is preferred for walkers due to the panoramic views.
3. The new section of the downhill cycle track would be below the ridge and to the northwest of the existing forest track.
4. Walkers are catered for by a new separate meandering path, beginning at the stream culvert a short way in from the entrance off the Kiwi Crescent right-of-way. This track will have low grades that allow easy uphill walking along and up the ridge to the east of the existing forest track, eventually connecting to the existing forest track approximately 420m below the farm gate, and thereby bypassing the current steep climb from the bottom.
5. Measures should be implemented on the tracks to ensure that walker and cyclist users are confined to their own track and separated for safety reasons, e.g. the inclusion of steps and biking barriers on the walking track.
6. Powerful signage be erected to help understand compliance.
7. Communication with cycle groups (such as the Mana Cycle Group) to encourage understanding and compliance.

Track Proposal Three - A track for the less able people such as those with disabilities, older people, or those with little children.

FOTBR proposes the establishment of a loop meandering walking track (called Puratoke Track (glow-worm track) close to Kiwi Crescent. Land where tracks can be constructed with very gently slopes (1-3 degrees) or gentle slopes (3-5 degrees) are constrained here to a narrow corridor beside the stream. Suggestions from people surveyed are that they would like this track to be a loop walk.

Measurements and observations show a track would be possible as follows:

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1. The Puratoke Track would start at the Kiwi Crescent entrance and follow the walkers track ascending for approximately 280 meters into the Forest of Tawa.
2. It would then turn north and east and gently descend, meander downward towards the stream at a lower level nearer to the stream, creating a second trackway back to the entrance. Thereby not directly repeating the inward walk but undertaking a "new" view and creating a 600 m (approx.) round trip over grades of from 1 to 5 degrees ascending and 1 to 9 degrees descending
3. The descending Puratoke Track must remain on the true right bank of the stream due to the lands steepness and to retain biological protection of the south facing terrain for the Puratoke.

Track Proposal Four - an arboretum and information signs

FOTBR proposes the establishment of a modest arboretum with appropriate signage and education information be established on the flattish land that occurs at approximately 260 to 280 metres up the track from the Kiwi Crescent entrance. This would be an informative and educational centre for all who visit this trackway.

Due to the botanical value of the undisturbed area on the northern side of the stream below the existing culvert crossing, any future tracks should remain on the south side until that culvert crossing is reached.

FOTBR is willing to advise and contribute as a community stakeholder to the development of these track proposals.

Walking and Cycling Track from Chastudon Place

FOTBR recommends that improvements be made to the short, but steep and rough access route, which currently exists between Chastudon Place and the ridgeline so that this also becomes another ridgeline access point that becomes more acceptable for use by a wider range of users. This access point is also located quite close to the proposed bottom stations of the PAP zip-line.

Entrances

The OGBMP asks for suggestions for access points.

FOTBR submits that it supports that the entrance from Kiwi Crescent to Forest of Tawa being designated a Secondary OGB entrance.

FOTBR submits that it recommends that a new designated Main OGB entrance be created as part of the Upper Stebbings Valley Structure Plan and be located at the head of Stebbings Valley, which would have links to the OGB through both the airstrip block and the Marshall ridge connectors.

The draft OGBMP suggests that there is potential for a roadway, car park or playground in the Forest of Tawa at the Kiwi Crescent Entrance.

FOTBR strongly opposes this suggestion for a roadway, car park or playground in the Forest of Tawa at the Kiwi Crescent Entrance because:

1. There is insufficient room to accommodate a roadway and tracks for walkers and cyclists.
2. Combining drivers, walkers, the less abled, and cyclists on a single road would create significant and unacceptable safety hazards.
3. There is already an under-utilised public playground and park, the Larsen Park, only 220m from the Kiwi Crescent entrance. Data collected daily, at random times each day, from December 2018 till March 2019 shows that over this period Larsen Park has never had any visitors at the times the observer was collecting data at the park.
4. The WCC Northern Reserves Management Plan March 2008 recommends decommissioning Larsen Park (220 meters from the entrance to the Forest of Tawa) hence it is difficult to understand the WCC recommendation for another cold, damp, uninviting, isolated children's park in an adjacent ecological area, just 220 meters away.
5. A roadway, car park, and playground are inconsistent with the rationale for the purchase of the land, 'to preserve its ecological, recreational and water management value'.

FOTBR also suggest that given the impact of public access to the landowners adjacent to the Forest of Tawa Kiwi Crescent track entrance, the Council should consult with them to agree measures to improve their privacy and security.

6.1.1.7 Community awareness

It is noted that the PGBMP mentions that the 2017 purchase of Forest of Tawa was strongly advocated by the local community, reflecting the value it places on the open space along this ridge.

FOTBR submit that the other reasons for the community interest in purchase of this block should also be noted;

- protection of the indigenous remnant and regenerating landscape as part of a western Tawa hills corridor, and
- protection of the steam catchment to maintain water quality and management of downstream flood mitigation and sediment runoff.
- and enhanced recreational access potential with ability to access the ridgeline and recreation areas beyond, and in particular the ability this provided to connect the Redwood Bush and Forest of Tawa tracks to form a 2-3 hour loop walk, using existing

tracks, including some on private land. A number of WCC Councillors walked this route prior to deciding on the purchase.

6.1.2 ACTIONS

FOTBR generally support the proposed ACTIONS for Management Sector 1 with the following comments.

6.1.2.1 - Land Administration

Land Status

With regards to this ACTION

“4. Advocate for Open Space provisions in the Upper Stebbings Valley Structure Plan process to extend and help connect reserves along the Ohariu Ridge in Management Sectors 1 and 2.”

It is noted that Ohariu Ridge is not actually included in the Upper Stebbings Valley Structure Plan area so FOTBR recommends that this ACTION should be focused on “Advocate for Open Space provisions in the Upper Stebbings Valley Structure Plan”, and a separate ACTION be added to “Explore options to negotiate access across private land to bridge the gaps in the existing track network along Ohariu Ridge between the airstrip block and Old Coach Road”.

6.1.2.2 - Nature

Weeds And Animal Pests

FOTBR recommend that a specific ACTION be included here to

“Develop and execute a plan to control wilding cherry trees through Management Sector 1.”

Research

With regards to the ACTION

“14. Monitor water quality, aligned and timed with forestry and restoration activities, so that the earlier stages of work inform how the later stages will be carried out, with particular attention to mitigating potential downstream effects in Porirua Stream and the harbour.”

FOTBR submits that this ACTION for water quality and fresh water fauna monitoring should be undertaken as a research activity regardless of the forestry and restoration activities, to provide a baseline to monitor the water quality of the area and early warning of any deteriorating activity.

6.1.2.3 - Landscape and Land Use

Open space management and structure planning

FOTBR notes that the Ohariu ridgetop Skyline Track potential route is not part of the Upper Stebbings Valley structure plan area.

Forest management

As mentioned earlier in Management Sector 1 FOTBR OPPOSES the ACTION

"4. Progressively remove the exotic plantations in the Spicer / Forest of Tawa area and restore the area to indigenous vegetation, as per plan shown in the Management Sector 1 maps."

6.1.2.4 - Culture and Heritage

Interpretation

1. **FOTBR recommends** that Tawa Historical Society be included as a stakeholder for consultation on the consideration of interpretation material for the local history of Management Sectors 1 and 2.

6.1.2.5 - Recreation & Access

Track Network

FOTBR submits that the ACTION

"2. Explore the potential benefits and feasibility of better connecting Spicer Forest and the Council property at 944 Ohariu Valley (with its road-to-ridgetop access) along Ohariu Valley Road, for walkers, horse riders and cyclists."

be modified to read

"2. Explore the feasibility of better connecting Spicer Forest and the Airstrip Block gap, for walkers, horse riders and cyclists, via easement or purchase."

FOTBR also submits that Redwood Bush, the Airstrip Block and Spicer Forest / Forest of Tawa should be connected. A route already exists, dating back to at least World War II. An additional ACTION should be inserted to focus on negotiating with the land owner to formally allow maintenance and public use of the track.

Entrances, facilities and wayfinding

With respect to the ACTION ...

4. Investigate where to develop a new main entrance in this sector ...

FOTBR submit that a "Main entrance" to be provided at the head of Stebbings valley as part of the Upper Stebbings Valley Structure Plan with connector tracks through the Airstrip block to meet with the Te Araroa Walkway, and to the Marshall ridgeline to meet with a future bridle walking track from Brasenose Park to Spicer Forest.

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<p>FOTBR supports the development of a Secondary category OGB entrance at Kiwi Crescent, and that further Secondary entrances be provided at the end of Ohariu Valley Road, and near the Marshall ridge above the Arohata Block.</p>
<p>Sector 1 MAPS</p>
<p>Sector 1: Te Ngahere-o-Tawa / Redwood – Current map</p> <p>FOTBR recommend that the legend title “OGB Reserve and WCC Land” be changed to “OGB Reserve” as it is on the Future initiatives map.</p> <p>While outside of the OGB area - FOTBR recommend that the tracks of Charles Duncan Reserve and Woodburn Reserve probably should not be indicated as Shared Use Tracks.</p>
<p>6.2 SECTOR 2: OHARIU RIDGE</p>
<p>Under Local Communities of interest :</p> <ul style="list-style-type: none"> • add Ohariu valley
<p>6.2.1 OVERVIEW</p>
<p>As explained under sector 1, FOTBR SUBMIT that the northern boundary of Management Sector 2 be retained as indicated in the Sector 1 or Sector 2 maps; i.e. the bush areas of Stebbings Bush and the Redwood Bush extension which are part of the Upper Stebbings Valley structure plan and that are contiguous with the existing Sector 1 OGB bush and plantation areas and are likely to in future become part of the OGB, should also be included in Sector 1 and not Sector 2.</p>
<p>6.2.1.1 Land Status</p> <p>FOTBR recommend that the heading for this section become “Land Administration” to be consistent with other Management area sections.</p> <p><i>Upper Stebbings Valley Structure Plan.</i></p> <p>FOTBR applaud the benefits of the holistic forward planning that a structure plan provides for the greenfields residential housing development proposed for the Upper Stebbings Valley area, and the allowances that this will provide for riparian and waterway protection, using a water sensitive design model, provision for green space areas for neighbourhood parks and protection of the remaining native bush remnants and regenerative bush areas and particularly those contiguous with the OGB.</p> <p>While this structure plan area is outside of the scope of the OGBMP review, there are important consequences that the Upper Stebbings Valley Structure Plan should consider by virtue of it being a neighbouring area to the OGB and some of the goals and visions of the OGBMP.</p>

FOTBR therefore SUBMIT that the OGBMP become a input to the Upper Stebbings Structure Plan design process and relevant submissions related to this area be provided by the OGBMP Team to the Upper Stebbings Valley Structure Planning Team.

For this purpose FOTBR has summarised our recommendations for the Upper Stebbings Valley Structure Plan design in the opening General Comments Section of this submission.

The OGBMP makes mention that “A local road could be built in future over Marshall Ridge, connecting Churton Park and Redwood.”

FOTBR SUBMIT, that due to the current controversial nature of any road between Stebbings Valley and Tawa that mention of such a road be deleted, and rather that the Upper Stebbings Valley development will in future facilitate additional access routes between Stebbings Valley and Tawa.

FOTBR further SUBMITS, that any local road should avoid the bush land above Redwood Bush, including that which is privately owned. This means that the road will need to follow a route to the south of the bush.

6.2.1.4 Recreation and access

FOTBR SUBMITS that, on the question of the need for a new entrance to the OGB in the vicinity of Management Sector 2, that preference be given for a new Main category OGB entrance being created at the head of Stebbings Valley and that provision be made for this within the Upper Stebbings Valley Structure Plan, with secondary entrances at Marshall ridge above Arohata Block (depending on new roadway routes), and at the Old Coach Road entrance.

6.2.1.5 Culture and Heritage

FOTBR recommend that the Tawa Historical Society and local Maori Iwi be included among the local history groups when time comes for consultation about places or values of interest in this sector, and associated information panels or online references.

6.2.1.6 Community

FOTBR wishes to have noted that it is actively involved in the northern part of this Management Sector and wishes to be consulted as a stakeholder, particularly with regards to the Redwood Bush Extension and Stebbings Bush areas and the Airstrip Block.

6.2.2 ACTIONS

FOTBR generally support the proposed ACTIONS for Management Sector 2 with the following comments.

6.2.2.1 - Land Administration

Land acquisition

1. "Continue to look for opportunities to improve the connectivity of the OGB along the Ohariu Ridge."

FOTBR STRONGLY SUBMIT that WCC give proactive priority to this action by way of easement over private land if necessary, to allow pedestrian access along an extended Skyline walkway.

2. "Advocate for Open Space provisions in the Upper Stebbings Valley Structure Plan process to extend and help connect reserves along the Ohariu Ridge in Management Sectors 1 and 2."

FOTBR note that as per Sector 1 ACTION - Ohariu Ridge is not actually included in the Upper Stebbings Valley Structure Plan area so that this ACTION should be focused on "Advocate for Open Space provisions in the Upper Stebbings Valley Structure Plan", and a separate ACTION be added to "Explore options to negotiate access across private land to bridge the gaps in the existing track network along Ohariu Ridge between the Airstrip Block and Old Coach Road".

6.2.2.2 - Nature

Caring for Nature

2. **FOTBR recommend** that "Work with neighbouring landowners to identify and protect prime bush remnants through future subdivision proposals", not be just through further subdivision proposals – also by being 'good neighbour'.

Streams

FOTBR recommend that an additional generic ACTION be added to "Protect and enhance the vegetation cover in stream catchment areas".

6.2.2.3 - Landscape and Land Use

Open space management and planning

1. "In the Upper Stebbings Valley structure planning process, advocate opportunities to reinforce the OGB important role in urban form and open space provision, including:"

FOTBR suggest the addition of the following points be added to this Action;

- e) Protecting the continuity of open space along the northern sector of the Marshall Ridge as both the visual backdrop for the suburb of Tawa and protection of the Redwood Bush extension bush areas.
- f) Maintaining some areas of open grassland on the ridges to preserve viewpoints.

6.2.2.5 - Culture and heritage

Naming

1. **FOTBR OPPOSES** the inclusion of the entire forest area of Spicer Forest under the name of

“Te Ngahere-o-Tawa / Forest of Tawa” as explained under Management Sector 1 above.

This Action is also related to Management Sector 1 and not Management Sector 2.

Interpretation

2. **FOTBR recommends** that Tawa Historical Society be included as a stakeholder for consultation on the consideration of interpretation material for the local history of Management Sectors 1 and 2.

Track Network

4. “Explore opportunities to connect the 2km gap in the Skyline Walkway between 944 Ohariu Valley Road and 268 Ohariu Valley Road properties.”

FOTBR recommend that the ACTION be added here transferred from Management Sector 1 “Re-route the Skyline Track to the ridgetop in the event of securing public access across the top of the ridgetop to the north along the ridge.”

Entrances and facilities and Wayfinding

FOTBR recommend that a Main category OGB entrance be provided at the head of Upper Stebbings Valley and further secondary entrances be provided at the end of Ohariu Valley Road, near the Marshall ridge above the Arohata Block, and at the existing Old Coach Road entrance.

6.2.2.6 - Community

FOTBR recommends that the following ACTION included in Management Sector 1 also be repeated for Management Sector 2.

Work with neighbours

2. “Continue to support and encourage neighbouring landowners to participate in local pest animal management / weed control / restoration planting on their land, especially if it contains important native bush remnants and or adjoins OGB reserves of high natural value, such as Redwood Bush, or the seed sources important for enhancing the OGB ecological corridor.”

PART 7 – APPENDICES

APPENDIX 3 - SUMMARY OF SITES REQUIRING CLASSIFICATION UNDER THE RESERVES ACT

FOTBR supports the principle that land areas designated as part of OGB be classified as Scenic B Reserve under either Section 14 or Section 16 of the Reserves Act, as applicable.

Specifically for Management Sector 1 - Spicer Forest (1.2.1 and 1.2.2) and Forest of Tawa

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(1.3.1 and 1.3.2).

FOTBR SUBMITS that these parcels also be rezoned to Open Space B in the District Plan in keeping with other similar OGB parcels.

It is noted that the Spicer Forest parcel 1.2.3 owned by PCC is not proposed to be classified.

FOTBR recommends that WCC raise this with PCC to suggest that this parcel be also classified as Scenic B Reserve.

It is noted that that the Airstrip Block is not proposed to be classified under the reserves act at this time – it remains rural. **FOTBR recommends** that this parcel also be classified as Scenic Reserve B once the house situation is resolved and this plantation harvested.

FOTBR wish to make an oral submission.

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OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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Tawa Rugby Football Club (TRFC) Submission on the Wellington City Council Outer Greenbelt Management Plan 2019 Review Closing 25 March 2019

TRFC

Tawa
Wellington 5028

INTRODUCTION

Submission address: outergreenbelt@wcc.govt.nz.

Reason for the submission

1. Although the Tawa Rugby Football Club (TRFC) is managed as part of the Northern Reserves Management Plan, several of the conditions suggested in the Outer Green Belt Management Plan (OGBMP) will impact on the TRFC and therefore the TRFC wishes to submit regarding the OGBMP.
2. Although the TRFC is not adjacent to the OGBMP, any planned activities in the OGBMP that affect the stream running past the TRFC and any activity that is likely to affect stream flow, and flooding has had, and will continue to have, a seriously affected on the TRFC.
3. Any OGBMP flow on affect down into Tawa will affect the TRFC.
4. The TRFC also submits in support of some aspects of the Friends of the Tawa Bush Reserves submission, and local neighbours in the area.
5. If tracks and parking are issues in the development of green spaces and native forests then the TRFC proposes linking parking around the club to the Forest of Tawa via a trackway that passes up the reserve area at the southern end of Lyndhurst Park to Larsen Reserve and on to the Forest Of Tawa.

The Submission Presenter

The presenter for the TRFC will be Gary Beecroft. His postgraduate qualifications are in Natural Resource Management (Lincoln University) and he was previously employed by the DSIR Soil Bureau as a soil scientist and land use management. In his specialty area of Land Use Management, he worked in afforestation schemes in the West Coast and King Country, in irrigation and drainage in Otago, Egypt and Israel, and with the Department of Conservation on ecological environments under threat in Otago.

Proposed:

The OGBMP proposal is for a roadway, car park or playground in the Forest of Tawa at the Kiwi Crescent Entrance.

Tawa Rugby Football Club wishes to submit the following proposal for a walking track that starts at the available parking beside and around the TRFC, and would passes around the football grounds and then up the reserve land beside the creek that runs around Lyndhurst Park through to Larsen Park and then on to the Forest of Tawa beginning in Kiwi Crescent.

This would enhance to walking possibilities of residents and would be convenient regarding parking. This linkage to the current track through the Forest of Tawa from Kiwi Crescent to Spicer Road would further increase this popular walking track. It is a beautiful walk, with ridgeline panoramic views up and down the Tawa valley. This track also provides a

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valuable direct connection to Te Araroa (the national walkway) and Colonial Knob. The track has been described as a 'family track'.

General Proposal for Tracks

Tawa Rugby Football Club proposes that from Lyndhurst Park to the Forest of Tawa the tracks should be limited to just three, to be used as follows:

1. A track for fit able walkers.
2. A track for the less able people such as those with disabilities, older people, or those with little children.
3. A downhill only track for cyclists.

Reasons and Track Use Description

1. The current track is used by fit able walkers to both ascend and descend the walkway.
2. Mountain bikers only use the track as a very fast-downhill descent into Kiwi Crescent, because in substantial parts it is too steep and narrow for uphill cycling.
3. Unless cyclists are separated from walkers, it's only a matter of time before a serious injury occurs. Older people who have encountered cyclists coming downhill towards them report feeling uncomfortably and vulnerable. Tawa Rugby Football Club is receiving increasing reports of near misses.
4. Residents also have vehicle right of way over the ROW entrance from Kiwi Crescent and there are already many incidents of passageway conflict between residents' vehicles, cyclists and walkers.
5. Tawa Rugby Football Club reiterates, it is only a matter of time before the confluence of activities in the current Right of Way results in an accident.

Note: Tawa Rugby Football Club submits that walkers of all ages should be able to walk public tracks without fear of cyclists or resident's cars running them down.

Track Proposal One - Access down the Right of Way

Tawa Rugby Football Club strongly requests that there be at least two separate access ways down the Right of Way from Kiwi Crescent to the entrance of the Forest of Tawa. This would require the widening of the existing road and:

1. A paved driveway for use by cyclists and residents' vehicles, south side of the entrance.
2. A paved separate walkers' path, on the north side of the right of way entrance.
3. Physical separation of the two access ways.

Track Proposal Two – Beyond the Right of Way Entrance

Beyond the Right of Way entrance, Tawa Rugby Football Club supports the proposal for two separate tracks to connect to Spicer Forest Road, one for cyclists and one for walkers:

1. The existing forest track becomes part of two new tracks – the lower section incorporated into a downhill only track for cyclists, the upper section into a path for walkers.
2. Cyclists are catered for by a downhill only track comprised of a new track from Spicer Forest Road, eventually connecting to the existing forest track approximately 420m below the farm gate. The track is downhill only, because the steep parts of the existing forest track are too steep, narrow and long for uphill cycling, and where the grade lessens the track is preferred for walkers due to the panoramic views.
3. The new section of the downhill cycle track would be below the ridge and to the northwest of the existing forest track.
4. Walkers are catered for by a new separate meandering path, beginning at the stream culvert a short way in from the entrance off the Kiwi Crescent right-of-way. This track will have low grades that allow easy uphill walking along and up the ridge to the east of the existing forest track, eventually connecting to the existing forest track

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approximately 420m below the farm gate, and thereby bypassing the current steep climb from the bottom.

5. Measures should be implemented on the tracks to ensure that walker and cyclist users are confined to their own track and separated for safety reasons, e.g. the inclusion of steps and biking barriers on the walking track.
6. Powerful signage be erected to help understand compliance.
7. Communication with cycle groups (such as the Mana Cycle Group) to encourage understanding and compliance.

Track Proposal Three - A track for the less able people such as those with disabilities, older people, or those with little children.

Tawa Rugby Football Club supports the proposal to establishment of a loop meandering walking track (called Puratoke Track (glow-worm track) close to Kiwi Crescent. Land where tracks can be constructed with very gently slopes (1-3 degrees) or gentle slopes (3-5 degrees) are constrained here to a narrow corridor beside the stream. Suggestions from people surveyed are that they would like this track to be a loop walk.

Measurements and observations show a track would be possible as follows:

1. The Puratoke Track would start at the Kiwi Crescent entrance and follow the walkers track ascending for approximately 280 meters into the Forest of Tawa.
2. It would then turn north and east and gently descend, meander downward towards the stream at a lower level nearer to the stream, creating a second trackway back to the entrance. Thereby not directly repeating the inward walk but undertaking a "new" view and creating a 600 m (approx.) round trip over grades of from 1 to 5 degrees ascending and 1 to 9 degrees descending.
3. The descending Puratoke Track must remain on the true right bank of the stream due to the lands steepness and to retain biological protection of the south facing terrain for the Puratoke.

Track Proposal Four - an arboretum and information signs

Tawa Rugby Football Club supports the establishment of a modest arboretum with appropriate signage and education information be established on the flattish land that occurs at approximately 260 to 280 metres up the track from the Kiwi Crescent entrance. This would be an informative and educational centre for all who visit this trackway.

Due to the botanical value of the undisturbed area on the northern side of the stream below the existing culvert crossing, any future tracks should remain on the south side until that culvert crossing is reached.

Tawa Rugby Football Club is willing to advise and contribute as a community stakeholder and a downstream neighbour to the development of these track proposals and any effect they may have on stream flow, and rainfall run-off.

Tawa Rugby Football Club submits that it supports that the entrance from Kiwi Crescent to Forest of Tawa being designated a Secondary OGB entrance.

Tawa Rugby Football Club submits that it recommends that a new designated Main OGB entrance be created as part of the Upper Stebbings Valley Structure Plan and be located at the head of Stebbings Valley, which would have links to the OGB through both the airstrip block and the Marshall ridge connectors as this would also take pressure off the Kiwi Crescent entrance and reduce negative affect on the stream flowing there.

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The draft OGBMP suggests that there is potential for a roadway, car park or playground in the Forest of Tawa at the Kiwi Crescent Entrance.

The TRFC strongly opposes the suggestion for a roadway, car park or playground in the Forest of Tawa at the Kiwi Crescent Entrance because:

1. There is insufficient room to safely accommodate a roadway and tracks for walkers and cyclists.
2. Combining drivers, walkers, the less abled, and cyclists on a single road would create significant and unacceptable safety hazards.
3. There is already an under-utilised public playground and parks, in Lyndhurst park. Data collected daily, at random times each day, from 18th December 2018 till 23rd of March 2019 shows that Lyndhurst Park has a very low attendance rates at the times and days surveyed). Lyndhurst Park; 95 people in 95 days average one per day.

Anecdotal analysis

1. Low occupancy of Lyndhurst Park is a little hard to understand, given the proximity of the football field but is an indication that play grounds for young children are losing popularity.
2. Furthermore, such playground no long hold an interest for children because every Kindergarten, play Centre and schools also has that equipment installed.

Submission

The number visitors playing at the children's playground at Lyndhurst Park indicate there is no need for another children's park, and the expense of such a park could be better used in developing a walkway from Lyndhurst Park to Larsen Reserve and on to the Forest of Tawa.

If such a track was developed, then there is already considerable parking around the TRFC with 76 available car parks at Lyndhurst Park.

Further points

1. A roadway, car park, and playground are inconsistent with the rationale for the purchase of the land, 'to preserve its ecological, recreational and water management value.
2. As neighbours to the proposed reserve we want to ensure that management of the Forest of Tawa stays true to the original reasons the community supported its purchase - to return the land to its lowland forest origin, with high quality water and available recreational opportunities for the community.
3. **Furthermore**, the TRFC believes the WCC should not harvest or fell the pines trees on the land called the Forest of Tawa and Spicer Forest below Spicer Road, and instead manage the pines to allow the natural understory succession of native forest to succeed the pine trees.
4. Felling the pines trees will further exasperate rapid runoff and peak stream flows.

Proposal

The TRFC propose that the pine forest land between Tawa and the western ridgeline is left intact; and that the management of the area include enhanced (active replanting planting) native species succession of the pine trees.

Reasons

1. A very important reason is to allow these lands to return to their original ecology of a lowland native forest with high quality water management and recreational opportunities for the community. The pine forest land between the ridgeline and

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Tawa already has the advantage of a significantly advanced understorey of regenerating natives.

2. **Erosion** Harvesting or mass felling of the pines on land above Tawa will significantly increase the erosion of the hilly lands, which will increase sedimentation into streams, and cause a loss of stream ecology and water quality, conditions identified by Landcare Research for these types of land.
3. **Rainfall runoff and Flooding** Harvesting or mass felling the pine trees will also significantly increase rainfall run-off rates and put Tawa at risk of flooding like, or worse than, the Tawa flood on the 15th of May 2015. There is significant research by Landcare, the Ministry of Works, and the New Zealand Forest Research Institute Limited that shows that pine forest harvesting, and deforestation plays increases erosion, subsequent sedimentation, and increasingly rapid runoff and related flooding because trees prevent the erosion, contain sediments and delay runoff rates because forests roots hold the land in place and the canopy absorption rainfall and slow overall runoff.

4. **Stream Grills**

The stream that runs past 58A Kiwi Crescent is piped at 56 Kiwi Crescent and the pipe has a grill at the pipe entrance. This type of drainage structure is repeated at the Tawa Rugby Football club – 23 Lyndhurst Road, and again at 182 main Road Tawa.

Evidence collected on the 15th of May 2015 shows the effect of rapid runoff, debris collection at the grills and eventually flooding due to stream overflow at the grills and into many parts of Tawa in the Kiwi Crescent, Lyndhurst Road, Larson Crescent and the Tawa Main Road. A repeat of the situation experienced in May 2015 will only be put at greater risk if the pine trees are removed, slash and debris can enter the stream way, and the stream is treated as a natural drain without debris retaining structures before the pipe way grills.

What happened in 2015 was that the removeable grills were not removed allowing a heavy build-up of debris on the grill and acting like a dam. Once the grill was dammed by forest debris the water simply ran outside the stream channel and the pipe and down the roads of Tawa. Since then, the removable grills have been replaced with fixed grills which cannot be removed, making the concept and need for debris wall upstream even more important. The current structure will eventually cause a repeat of the 2015 flooding of Tawa and the TRFC.

In all the pipe ways in the stream that drains the Forest of Tawa, and other parts of the OGBMP flooding risk will remain high if the streams are treated like a free available drain.

5. Furthermore, natural succession avoids the disruption to access and enjoyment of the forest that would occur over the period the trees were to be harvested.
6. The current character of this forest - exotic pines with a well-developed native understorey at eye-level - is a point of difference, enjoyed by residents, and consistent with the OGB's guiding principle of diversity of landscapes.
7. Natural succession avoids the significant risk of major erosion if trees are felled and harvested in large numbers on these unstable hilly and steep slopes. (Landcare)

The TRFC would like a representative to make a formal 10-minute submission to council members.

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Appendix One; Photos of the flooding up and down Lyndhurst Road, and around the rugby club.

Debris around Kiwi Crescent Grill



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Over flow water flowing into Kiwi Crescent



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Neighbours down stream of Kiwi Crescent grill



Lyndhurst Road Below the Rugby Club



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Lyndhurst Road Housing



The rugby club

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The Lyndhurst park grill blocked and stream overflowing



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Flood Level



OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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Submission - Draft Outer Green Belt Management Plan 2019
Georgia Vaughan

Thank you for the opportunity to submit on the Draft Outer Green Belt Management Plan 2019. This is my written submission. I'd like to present an oral submission too. I'm a member of the group Wellington the Walking Capital.

According to the Draft OGB 2019 more than 70% of Wellington track uses are pedestrians and only 20% are mountain bikers yet many of the Key Actions reflect the needs of mountain bikers. While the plan claims to want to protect the environment many of these Key Actions will have the exact opposite affect, causing unnecessary environmental damage. I believe the Wellington Regional Trails for the Future – a strategic framework for trails in the Wellington Regions, 2017, and the mistaken belief of many Councilors and Council Officers, believing mountain biking will bring economic growth to Wellington, is the real driving force behind many of the Key Actions.

After talking with a large number of walkers and runners, I believe that the OGB needs to reflect 3 overarching principles in this order – environmental protection, safety for people and a pedestrian-centric approach.

- Firstly, protection of the environment trumps everything in all decision making. And changes, big and small, be it management plans, track maintenance, track building or tree felling must be based on best environmental practice. Protecting our forests usually means leaving them alone (exotic and native) unless there's a compelling environmental reason for development or change (it goes without saying that pest management is essential).
- Secondly, WCC needs to keep track users safe. Activities such as mountain biking and dirt biking, for example, must be restricted to designated focus areas which give priority to a particular activity. Mountain biking and walking/running on shared tracks in hilly bushy terrain isn't safe. However, some tracks may be suitable for bikes and pedestrians to share but these 'shared tracks' must meet a strict criteria.
- Thirdly, since 70% of track-users are pedestrians the OGB needs to reflect their needs.

As a long standing resident in Karori and a member of Wellington the Walking Capital I'm going to focus my submission on 2 areas: Karori Park and Johnston Hill.

WCC has spent time and money consulting with mountain bike groups. They have not consulted extensively or adequately with the biggest user group: walkers and runners. If they had the Draft OGB Management Plan 2019 would look completely different.

Karori Park's Forest

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I object to WCC's plan to build 2 connector tracks in the forest behind Karori Park. WCC misled the community about this proposal in The Wild Side of Karori Park Consultation in December 2015. The Draft Makara Peak Mountain Bike Park Master Plan in November 2016 made it clear that Karori Park would become a secondary entrance into Makara Peak, thus changing a suburban family forest into an extension of Makara Mountain Bike Park – something Council Officers and representatives of Makara Peak strongly denied in all of the many 'Save Karori Park Forest Group' meetings in early 2016. In fairness to the people of Karori and all the people that use this forest a fair and transparent public consultation needs to take place. Their needs to be full and frank disclosure about WCC's true intentions in transforming a quiet forest used in the main by walkers and runners into an extension of Makara Mountain Bike Park. I will be referring this breach of process and inadequate consultation to the Ombudsman.

Johnston Hill Scenic Reserve

Johnston Hill was changed from a 'pedestrian-only area', because of a slyly placed ambiguity in the OSAP 2016, into a predominantly 'shared-tracks' area. To date the Council has been unable to explain how this happened. There wasn't any community consultation on this change of track status in an area of huge environmental significance. This is a complete breach of process.

Because of the status of much of Johnston Hill becoming, albeit sneakily, shared, WCC have accepted a proposal from Wellington Mountain Bike Club to build: 5 grade 5/5+ downhill mountain bike tracks through areas of regenerating native bush in pine forests; and to change an existing walking track, which follows a stream through pristine native forest, into a grade 5 downhill mountain bike track. This proposal should never have been considered by WCC and wouldn't have been if Johnston Hill Scenic Reserve was 'pedestrian-only'.

I demand that Johnston Hill in its entirety from David Crescent to Otari-Wilton's Bush return to its 'pedestrian-only' status. It's a Key Native Ecosystem and has important forest remnants. It's one of the very few places in the Outer Green Belt that people can walk and run and not have to worry about meeting a bike. The nasty accident on Mount Victoria several weeks ago, where a walker was seriously hurt after being knocked down by a cyclist, should be proof that pedestrians need bike-free forests to walk and run in.

I intend to get to the bottom of this.

Kind regards

Georgia Vaughan

[REDACTED]

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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25 March 2019

Outer Green Belt Management Plan (1781014)
Wellington City Council
PO Box 2199
Wellington 6140



outergreenbelt@wcc.govt.nz

Re: Outer Green Belt Management Plan Review

The letter is the submission of the New Zealand Four Wheel Drive Association (NZFWDA) in respect of Wellington City Council's Draft Outer Green Belt Management Plan 2019 (OGBMP).

The NZFWDA is the national 4wd body in New Zealand. It is a volunteer association which exists to encourage and promote the responsible use of 4WD vehicles and to advocate for their access to public lands.

A large number of 4wd Clubs in New Zealand are affiliated to the NZFWDA, which is an Incorporated Society established in 1974. It is managed by its National Executive through a structure of three regional zones, Northern, Central and Southern, and the Competition Committee.

Collectively the Association comprises 62 affiliated Clubs, with some 2,000 members in total. The Cross Country Vehicle Club Wellington Incorporated (CCVC) is one such club and is one of the largest and most well respected 4wd clubs in New Zealand.

Our submission is made on behalf of all our affiliated clubs and their members. We understand that CCVC has made its own independent submission.

What our submission covers

Our submission is directed at those elements of the OGBMP that have relevance to the interests of the NZ 4wd community.

While we recognise that changes to reserves classification in places throughout the OGB will be necessary, we have not attempted to analyse those nor to make recommendations in that respect, although we would be happy to look more closely at this once the draft OGBMP is updated as a result of this initial round of consultation.

We have also not commented on other aspects of the OGBMP that are outside our scope.

Recreational access to tracks throughout the Outer Green Belt

The focus on allowing and encouraging recreational use of the OGB is admirable and we support this fully.

We recognise that there are many forms of outdoor recreation and that these must take place on a shared basis with each form of recreation respecting the others.

Section 4.5.2.2 on page 53 of the OGBMP allows for motorised vehicle access under certain conditions:

- We suggest the wording of the first numbered paragraph "Prohibit, or manage through specific approvals..." could be interpreted ambiguously and recommend it be reworded with more clarity. Even a simple change such as "Prohibit, except as managed through specific approvals..." would be preferred.
- It is rewarding to see the recognition of community services by our members, such as enabling some people access to the OGB who would otherwise be physically unable to do so. The wording could be expanded to state this as a fact, which it is historically, perhaps along the lines of "There have been occasions where infrequent one-off events have enabled

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some people to access the Outer Green Belt who would otherwise be physically unable to do so e.g. a 4WD club providing transport to enable a community group to carry out a botanical survey, or simply facilitating people with impaired mobility to enjoy the experience of the OGB. And this type of event should be allowed for in the future."

- All other aspects of 4.5.2.2 are entirely appropriate to the 4wd access that our members enjoy, and we strongly support the wording employed.

Section 4.5.2.3 on page 54, numbered item 4:

- This describes maintaining a primary network of vehicle tracks for adequate off-road vehicle access for Council management, utility servicing and emergency/civil defence vehicle access purposes while also serving as shared-use recreational tracks.
- In keeping with the intent expressed in section 4.5.2.2 we recommend adding reference to approved and permitted recreational 4wd vehicles.
- There may be other similar references in other parts of the OGBMP that would need a similar adjustment.

Section 4.5.2.6 describes organised outdoor events and programmes and discusses the concept of "signature" events.

- We support the approach of "managed activities" to handle such events.
- We suggest inclusion of an annual 4wd signature event where a local 4wd club could take members of the public as passengers on an excursion through the OGB, say along the ridge-tops, such as is already undertaken elsewhere as part of the Greater Wellington Regional Council's summer programme and its 4wd "sunset tour" events. Another example is the annual rubbish clean-up along the South Coast unpaved road.

Section 5.3.1 on page 77 includes a list of activities.

- We recommend that permitted recreational 4wd events be added to this list.
- Alternately this could be achieved by adding a general category of managed activities and a reference to 5.3.2
- We support the restrictions set out in 5.3.1.1

Section 5.3.3 describes prohibited activities.

- We support the inclusion in 5.3.3.1 item 3 the bullet "off-road use of motorised trail bikes or 4 wheel drive vehicles (unless approved for one-off recreational event access)" and in particular the meaning that the permitting of one-off events will be considered.

Community Contribution

- Although the OGBMP mentions community contribution in places, we did not find recognition of community contributions made by many volunteer organisations, and in particular for example the contribution made by CCVC over some 20 years.
- We recommend a specific allowance in the OGBMP (if it is not there already) to allow and encourage such activities.

Vehicle access along the South Coast unpaved road west of the Te Kopahou Visitor Centre

The existence of this well-established unpaved road is well known to Council and it has been the subject of much public and Council attention from time to time over the years, culminating in the inaugural South Coast Management Plan in 2001 and its successive updates.

While there are some exceptions, the road is generally used responsibly by people undertaking many forms of recreational use. Council considers improvements to the management and maintenance of this road from time to time. Section 6.7.1.5 describes this on page 191 of the OGBMP.

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Our comments:

- The predominant local 4wd club CCVC has worked in collaboration with Council over many years in the monitoring and maintenance of this road and its environs and this community contribution is well recognised by Councillors and Council Officers.
- We recommend that Council considers introducing a by-law to reduce the speed limit on this road. The by-law and associated sign-posting of that speed limit will provide a basis for enforcement.
- We support the action in 6.7.2.5 item 5 on page 196 to "increase park ranger and volunteer warden patrols throughout the week to enforce speed limits and promote respectful shared use behaviour."
- We support the intent expressed in 6.7.2.5 items 6 and 7 on page 196 to consult with the community on options of additional periods of road closure, in particular the specific inclusion of off-road vehicle users in that consultation.

Specifically regarding the apparent proposed inclusion of the South Coast unpaved road in the OGBMP:

- It is unclear whether the Draft OGBMP proposes to move the South Coast unpaved road into the OGBMP or not.
- Section 6.7.1.1 on page 186 refers to a need for a minor review of the South Coast Management Plan to remove the reserve from its scope. It is unclear what this means and while the detail might be explained elsewhere in the document, this wasn't readily apparent.
- If the meaning is that the road is moved out of the South Coast Management Plan and into the OGBMP, there are implications that don't appear to be addressed in this draft of the OGBMP.
- We support retaining this road as a legal unpaved road open to the public, accepting that various forms of restrictions may be appropriate to ensure appropriate use and behaviours.
- We recommend more focus to clarify the intent regarding the unpaved road and we expect that additional consultation with a focus on this will be appropriate.

In conclusion

Thank you for the opportunity to participate in the consultation on the draft OGBMP.

I confirm that we do wish to have the opportunity to speak in support of our submission at the hearing.

Yours faithfully,



Grant Purdie
National Public Relations Officer, on behalf of
The New Zealand Four Wheel Drive Association Incorporated

[Redacted contact information]

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Shona McCahon

Subject: FW: Submission on the Draft Outer Green Belt Management Plan 2019

From: guy holmes [REDACTED]
Sent: Monday, 25 March 2019 5:21 PM
To: Esther Hoskin
Subject: Submission on the Draft Outer Green Belt Management Plan 2019

Dear Esther,
I would be very grateful if you could put the contents of this mail forward as my written submission in relation to the Draft Plan change. I would still like to present to the Council though.
Best wishes,
Guy Holmes

Thank you for inviting submissions on the above mentioned proposed plan changes.

My family are particularly relieved that the Council appears to have dropped the idea put forward in the earlier (2004) Outer Green Belt Vision which sought to appropriate the use of our entire farm without any form of compensation. This was to be the same for at least 9 of my neighbours.

I hope that 2004 OGB vision is not still slithering around somewhere however it forms the background and basis for the present changes so I feel that consideration of some of its aims are relevant to consideration of the present draft plan.

Many people might feel that New Zealand has suffered too much from land thefts - not just in terms of the Treaty of Waitangi or the appropriations made at the time of WW1 and not returned, but also in terms of taking away the free and responsible use of land that a person 'owns'. The latter is very much the same thing in effect as 'taking' land though in a legal sense it is generally taking rights or legal interests over land. The effect however remains taking from the property owner.

As those land appropriations from both Maori & Pakeha demonstrate, the taking of land might have been 'legal' at the time, or even for 'the greater good of the community' but we do not now see it as 'right' or 'fair'. This is relevant to the OGB View and many citizens are not aware that taking the use of someone's property does not make the taking authority liable for compensation as it does under Statutes such as the Public Works Act.

1. Our farm

I would ask the Council to be vigilant and fair in relation to private property rights when exercising their powers as I do not believe that this has always been the case. I believe that it is relevant to mention just some of the limitations on the free and proper use on our land that are on top of what most farmers have to accept under the RMA and many, many other laws.

a) The previous owners were forbidden by Council to build on our 200 acre farm in the past on the basis that it was not a viable 'stand alone economic unit'. The former owners won the right in court to build but were never able to do this because they spent all their money on defending that right.

b) The right to drive the half of the city's power through our land in the form of the Wilton B pylon line was taken by a private Act of parliament. We now effectively maintain the access roads for Transpower's 4 pylons

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without compensation. We have to allow access to Transpower and all of their contractors on an almost daily basis. This is of great benefit to Wellingtonians which makes the imposition OK.

The Council seem to have created a 'corridor' under those powers lines which I believe exceeds the Statutory limitations on land use near such high voltage lines. This takes away much of the freedom of use of about 11 hectares of our farm.

c) The Hilltop and Ridgeline Overlay in the District Plan (DP) greatly limits the rights and uses of a further quarter of our farm. It renders one of our land titles virtually worthless. This tasted bitter when a Council officer expressed an interest in buying that devalued title for the City shortly after that plan change came into effect. This Hilltop restriction on our land feels excessive considering that it does not protect much of a view. We are not on the City side of the ridgeline at all, our farm is bisected by massive powers lines for it's entire length and when we look out from under or over those lines, we look at a windfarm.

The Rural rules under the DP are generally workable and appropriate enough for a farmer or forest owner, however the Overlay imposes much greater limitations and burdens on the carrying out of normal rural activities than do the Rural rules.

d) We were not informed of the 'consultation' in Makara last year concerning the extreme and now I hope outdated OGB proposal which included the appropriation of the use of our farm into it. None of the effected land owners that I have spoken to received such a notice either. I heard about it from a friend who lives on the other side of Wellington. We have been living in fear for the last year in relation to what the Council were seeking to take until these updated proposals were announced a few weeks ago. We did receive notice of those proposed changes however. It is not fair to seek to take away by stealth what we own by keeping us in the dark and asking someone who lives on the other side of Wellington a vague question about whether the city should have an OGB to save native plants etc. If they were properly asked whether they were happy to take it off families for no compensation, they might have expressed views that the Council did not want to hear.

e) All of our funds, our pensions, borrowings and revenues have been put into trying to make the most out of the farm that the Council long ago defined as non economic. We recently harvested some 50,000 pine tress and all of the funds have been turned back into the land by way of replanting in native and exotic hardwoods to make a non commercial arboretum. We chose to do this in the hope of being good keepers of the land and to one day be able to give our two children a piece of the land to hold as their own and build a home on as the Rural rules fairly contemplate. Had we been forced into being part of the OGB, all of this extra investment would have been wasted and the future gift to our children taken away by the state.

I ask that the Council please be sympathetic to the effort and investment that many of us landowners make. Our own hard work and investment is already wholly in line with both the Council and the Governments aims for a carbon sequestered, forested and beautiful piece of land on the edge of Wellington so please do not seek to take our children's inheritance away from them in the future - as the former OGB vision did - and confirm that this present proposal is the extent of the OGB vision now.

2. Urban expansion

The original 2004 document states that it's aim is to address the future needs of housing for an ever expanding City however it's provisions sought only to lock land up from development. The current OGB proposal is presented now as a land protection plan which is misleading. It necessarily dovetails into other plans and in particular the Councils Urban growth plan which extends out to 2043. It should not have been presented as a landscape protection plan it should have been presented for what it is - which is as a singularly large piece of the long term Urban expansion plan.

I found the proposal documentation to be full of 'green' and 'amenity' type superlatives giving it the feel of a 'spin' or 'PR' type of document to get the answer from the public that the Council wanted. I also found it unbalanced in that it includes no 'cons' to the proposal whatsoever - and there are many. Proposals having the

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effect of depriving Council's successors of their freedom to plan for the future do not appear to be in the interest of Wellingtonians. Whether true or not, the irreversible steps proposed make the Council appear to have motives other than the motives and aims expressed in the consultation documentation.

3. Why take choice from future generations?

There will be no going back from locking up an OGB in the manner proposed without an Act of Parliament. Wellingtonians can vote local politicians in or out in order to change their DP, but will lose the ability to reshape or rethink their city's future if these measures are adopted as they put any change of use or relevant land beyond the reach of our locally elected representatives. Why then take this irreversible step? I think the answers are not good:-

- a) I ran out of time to put in an OIA request to the Council to ask them what open space/reserve/park land they have sold off for development and what they might have on the books for the future. I have however been told of various such sales and if those stories were correct, I would feel very uncomfortable about the bona fides of the Council effectively locking out the competition from a Westward expansion.
- b) The Council have arrangements in place for a considerable degree of expansion North of Wellington. This has involved the creating of opportunities and contracts for developers and required investment in infrastructure. This proposal seems to me to have the intention of securing those interests by stealth because I cannot see another reason to put OGB land beyond the control of Wellingtonians of the future. The aims and uses that the Council claims to seek to achieve for the OGB area are largely already in place or within its control.
- c) Whilst the current and planned Northern expansion of Wellington will provide extra housing it does not provide for enough housing to cater for the Council's own projections of demand. All the more reason to keep our options open for a westward expansion. Further, the current plans involve a much greater investment in infrastructure than simply 'going over the hill' would do. The 'green' solution would arguably be to expand West of the city.
- d) I believe that Wellington has more recreational and reserve land than it knows what to do with. The Council spent years trying to ascertain what it actually owned in and around Wellington as there was so much. We probably already have more recreational land per capita than any Capital in the world. Why would we need more? What the Council and the Government say we are short of is not just housing, but affordable housing in Wellington. This proposal does not appear to me to form part of a rational scheme to solve those problems.
- e) Restricting land availability has the effect of forcing land prices up which puts affordable housing out of reach of those on low incomes. From the articles I read in the papers the poorer sections of our communities in and around Wellington tend to be Maori and Pacific Islander. A plan that will have the effect of making life harder for these specific members of our community is not a happy thought - even if this effect was not intended.

4. Summary

In the Court of Appeal case **Auckland Regional Council V North Shore City Council**, The Court's view was that 'S.5 (2)(a) of the RMA speaks of the reasonably foreseeable needs of future generations and that this should not be approached in a narrow way or with an eye to the protection of supposedly vested administrative interests'. I feel that this OGB proposal falls foul of the Courts interpretation of this Statutory provision.

Instead of encouraging a proper debate on the City's future expansion, this proposal seeks, in my view, to effectively 'lock in' and consolidate a range of proposals, visions, plans, policy's, investments and contracts for one direction only for Wellington's urban expansion. This may make those interests work together from an administrative point of view however this does not protect the interests of future generations which should be

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the Councils primary aim in these proposals according to a correct interpretation of the law. If any of these provisions were to secure private investment interests I would consider these proposals to be wholly objectionable.

Accordingly I do not support the Draft OGB management plan 2019 and feel that it is susceptible to challenge in the Environment Court.

Again, thank you for this opportunity to comment on the Draft.

Guy Holmes

[REDACTED]

Karori

Wellington 6147

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Makara Peak

Mountain Bike Park

Introduction

1. The Makara Peak Mountain Bike Park was established 20 years ago with the mission to create a world class mountain bike park in restored native forest. Since then 50,000 trees have been planted, and 50 kilometres of track have been built. There is significant community involvement, with 3,000 to 4,000 volunteer hours contributed every year.
2. The park gets an estimated 100,000 uses a year. These numbers are rapidly growing with users including bikers, runners and walkers. The range of users is broadening with riders as young as 7 using the park each week. With the popularity of e-bikes older riders are increasingly accessing the park as well. The park has an international reputation, with Redbull TV featuring Makara Peak and Wellington in a feature on mountain biking and 5 star Trip Advisor rating.
3. The restoration of the native forest is guided by the Makara Peak Ecological Restoration Plan. The development of the track network in the park is guided by a Master Plan which was developed by the Makara Park Supporters, the WCC and Trails' by Dafydd Davies in 2017 after widespread community consultation.
4. The supporters agree with the proposals in the draft Outer Green Belt Management plan and have provided specific comments in the attached appendix.
5. The areas of key importance are summarised below:
 - a. The establishment of a Park Ranger for Makara Peak, with 2 supporting rangers and an increase in funding to fully implement the Ecological Restoration Plan and the Master Plan.
 - b. Further support for pest control in the park – particularly large animals such as pigs and goats and certain invasive weed species which are very damaging and outside the ability of the Supporters to control. Makara Peak is a significant forest restoration project and requires this support to reach its potential.
 - c. Access to parts of the WCC Waste Water Land, better linkages to Skyline, Wrights Hill and the South Coast.

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- d. An upgrade to parking facilities to meet current demand. The main entrance is currently being upgraded, but further carparking is needed to meet current demand.

Park Ranger and operational management plan

6. Makara Peak currently has a 0.5 FTE ranger allocated to support the operation of the park. While the Supporters and the WCC Officers have an excellent working relationship, there are limits to what can be achieved with this level of resource.
7. Makara Peak currently lacks an overall 3– 5 year operational plan. The conservation work in particular relies heavily on a small group of volunteers who have been involved in the park for a very long time. This is currently well planned and executed, however there is a risk that if these volunteers moved on that much of the knowledge that has developed over the years would be lost.
8. As the trail network grows in size and popularity it is requiring more resources and planning to properly administer. Mountain bike tracks do need ongoing care and maintenance to be kept to the right level for park users. Some of the original structures in the Park are 20 years old and are due for replacement.
9. The Master Plan recommends that a park manager is engaged by the WCC to provide stable governance, and to be able to develop and implement a cohesive management plan for the park. The Supporters agree with this recommendation. The key role of the Park Ranger would be to:
 - Develop a 5 year management plan for the park;
 - Co-ordinate track audits and management;
 - Co-ordinating and resourcing track maintenance;
 - Co-ordinating conservation and habitat restoration work;
 - Co-ordinating and resourcing the inspection and maintenance of all signage and infrastructure;
 - Implementing the 10 year plan;
 - Co-ordinating and facilitating events within the park;
 - Co-ordinating and facilitating community engagement and volunteer management/working parties; and
 - Marketing, promotion and advocacy.
10. In addition, the Supporters request that the Park Manager should have 2 additional rangers to be available to assist with the implementation of the management plan. The Supporters have included in appendix 2 a recommendation for the funding increase the Park Manager will need to implement the Master Plan in appendix 2. This Appendix does not include amounts for the Ecological Restoration Plan, or for additional pest control requested below.

Conservation

11. Makara Peak is significant forest restoration project. There are now hundreds of established Rimu, Totara and Kahikitea in the park which are over 2 metres tall which started as seedlings, as well as established Tawa, Rata, Nikau and many other species which were almost completely absent from the area 20 years ago.

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12. The volunteer pest control effort is mainly focused on small animals (mice, rats, mustelids and possums), and targeted weed control. Large pest control (goats and pigs) is outside what the Supporters can manage. Similarly well-established areas of weed infestation are outside what the volunteers can control or eradicate. The Supporters request a significant increase in pest control budget to complement the volunteer effort and achieve the aims of the Ecological Restoration Plan.

Land Access and linkages

13. The Supporters support the proposal to strengthen linkage between Skyline and Makara Peak and onwards to the south coast. Better links with the Karori Park K2 track, Salvation/Deliverance on Wrights Hill and between Wrights Hill and Polhil would also benefit the overall trail network for all users. The exit from the South West of the Park via Bail Out is over private land. Permission to access this land can be revoked at anytime. The Supporters request that steps are taken to secure this route.
14. There is a small section of wastewater land between Karori stream and Leaping Lizard which we would like to be included into the park so that it can be replanted.
15. The main entrance is currently being redeveloped. This involves the removal of some historic, established plantings adjacent to Karori Stream. Once this work is done the Supporters request that the remaining plantings are given scenic reserve status, similar to the remainder of the Park.

Car parking

16. The carparks around the main entrance are often full by 9am on a Saturday morning and stay that way all weekend. The main entrance is being re-developed, but this will not result in any more carparks. The Supporters request that further work is done to improve carparking, including:
- a. The upgrade of 2 existing carparks as recommended in the Master Plan;
 - b. Consider the establishment of a further carpark on "Hazlewood Green" – above and area which has been replanted by the Supporters,
 - c. Better links to the often empty carpark on Fitzgerald Place at the bottom of Wrights Hill.
17. It would make sense that these three areas were developed with an overall plan to complement each other and to also allow better links between the Makara Peak bike park and Salvation/Deliverance on Wrights Hill.

Thank-you

Iain Feist

Chair, Makara Peak Supporters.

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APPENDIX 1 – Comments on Draft Outer Green Belt Management Plan

Specific comments an actions associated with Makara Peak

Overall comment: The Makara Peak Supporters support all initiatives proposed in the outer green belt management plan. We have noted the level of support in the table below in relation to level of priority that each initiative should be given from the Supporters' perspective.

Action	Level of support	Comments
Land administration		
Land status		
1. Survey off from the land designated for 'Wastewater Treatment Conveyance and Drainage Purposes' along South Karori Road all the land not required for the Council's waste water treatment infrastructure and reclassify	Very high	As part of the Makara Peak Master Plan an extensive trail network that will enhance the amount of grade 3 and 4 tracks in the park is proposed for the current

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it as scenic reserve (as proposed in Appendix III) to be managed as part of the Outer Green Belt reserves.		WWTP land. Progress in this area of the park is currently on hold until land access has been resolved. Potential access between Makara Peak and the South Coast is also contingent on access through this land.
2. Initiate the process required to stop the legal road through Makarā Peak to facilitate its primary use for recreation.	Moderate	
Nature		
Caring for nature		
1. Protect and restore the biodiversity values of Makarā Peak by implementing the conservation and biodiversity policies in the master plan.	Very high	Conservation and biodiversity in Makara Peak is a primary objective of the Makara Peak Supporters, reflected in the Ecological Restoration Plan
Streams		
2. Manage the tributary streams and potential effects on streams from track building and maintenance activities within this sector in accordance with the 'waterways and receiving environments' approach outlined on in the Makara Peak Mountain Bike Park Master Plan (where they are superior to regional, national and local policies in terms of protecting environmental values.)	High	Would also support a wider focus on stream health by focusing not just on track building and management on streams but also the effects of neighbouring residential land on key streams to raise awareness about stormwater runoff, weed dumping in the stream and rubbish.
Indigenous flora and planting		
3. Continue restoration planting on Makarā Peak of a wide variety of indigenous species, with a focus on planting emergent tree species.	Very high	Conservation and biodiversity in Makara Peak through restoration planting is a primary objective of the Makara Peak Supporters
4. Protect and encourage the spread of the tree fern / astelia plant communities that are a feature in places on Makarā Peak.	Moderate	
Weeds and pest animals		
5. Implement the weed and pest control programmes for the Makarā Peak Mountain Bike Park outlined in the master plan.	Very high	We would welcome active control of goats and pigs by culling and fencing. The restoration efforts of the Supporters, supported by plant donations from Council, are thwarted by the effect of pest animals

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6. Work with the national Biocontrol collective to monitor the effectiveness of the Darwin's barberry weevil as a biocontrol agent on Makarā Peak and Chartwell to guide improved biocontrol of Darwin's barberry in the Outer Green Belt.	Very high	We strongly support anything that can help control barberry in the park. Biocontrol by Council of African Club Moss, Japanese honeysuckle, ivy, pine, holly, gorse, tradescantia and blackberry is essential to the restoration of the Park as a forest.
Research 7. Support research into the factors limiting the dispersal of threatened or locally significant bird species from Zealandia such as tieke (saddleback), kākāriki (red-crowned parakeet), and toutouwai (North Island Robin).	High	We support this initiative within the context of the existing recreational use of Makara Peak mountain bike park and the plans for new tracks and areas within the park, i.e. without unduly limiting access to existing and planned active recreation areas of the park. We would welcome adding bellbird/korimako to the list of bird species.
Landscape and land use Landscape character and views 1. Manage vegetation to maintain open views from the Makarā Peak summit and other memorable viewpoints, in conjunction with providing the rest places proposed in the master plan, where appropriate.	Very high	A key attractor of the mountain bike park is the reward of extensive and impressive views from key vantage points. These should be maintained and enhanced with appropriate facilities, such as viewing platforms, seats, information boards and shelters. We understand that the part of land parcel 5.1.14 that the main carpark is situated does not currently have reserve status. Once the currently planned carpark changes are made we recommend this land is classified as scenic reserve to protect what is left of community-led restoration plantings alongside Karori Stream. The 15 years of volunteer work and many thousands of grant funding put into this area should be protected going forward.

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2. Keep the ridgetops and hiltops along the main ridgeline clear of any additional buildings or utility structures to retain the sense of undeveloped open space on ridgetop and the skylines as natural when seen from elsewhere.	Very high	In accordance with proposed enhancements for judicious shelter facilities proposed in the Master Plan.
Culture and heritage		
Interpretation		
1. Support telling the unique story of community volunteering to both develop a world-class mountain biking park and restore natural values, as proposed in the master plan, and integrate that story into the proposed overall Outer Green Belt interpretation plan.	High	In accordance with the Master Plan
Recreation and access		
1. Consider the potential and feasibility for extending the track planning through the additional reserve land along South Karori Road to link in with a route down Karori Stream to the south coast, taking into account how it would connect with the existing track network, likely use, and potentially diversify the type of riding experiences at the mountain bike park.	Very high	<p>Connections with the South Coast are a feature of the Master Plan and strongly supported by the Supporters.</p> <p>The OGB plan should also explore securing better access from the end of the formed South Karori Road to the planned Sth Coast joining point within the extended park. This will provide a safe bailout point that does not rely on the grace of adjoining landowners (currently the Bail Out track crosses private land without any formal protection). The sealed road used by WCC on a large easement would provide for easy access for pedestrians and riders in lieu of the extra climb that the Bail out track requires.</p> <p>Better connections with Karori Park, Wrights Hill and Polhill could also benefit the entire track network.</p>

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		We would also suggest that esplanade reserves along South Kaori Road and Stream are also considered as part of the OGB. Better public information should be available on these public areas.
	Moderate	An additional objective of this actions should be to enable walkers and bikers to coexist safely which clearly marked trails for different users will assist.
2. In consultation with the Makarā Peak Supporters, work out the best route for the Skyline Track to traverse the Makarā Peak Mountain Bike Park, and mark it clearly to ensure Skyline users, travelling in either direction, can easily find their way.	Moderate	
Facilities and way-finding 3. Develop and/or signpost a walking/running route (Skyline Track) through the bike park for people on foot so that the Outer Green Belt aspiration of a connected route from Tawa to the South Coast is a reality and a valued part of the Makarā Peak experience.	Moderate	
4. Investigate the inter-related questions of where and how to locate toilets and drinking water supply within the Makarā Peak Mountain Bike Park and at suitable intervals along the Skyline Track.	High	
5. Install signage at the Makarā Road saddle that makes clear the Outer Green Belt is on both sides of the road, with recreational opportunities.	Moderate	
6. As part of the comprehensive review of signage and way finding proposed in the master plan, ensure that adequate provision is made to guide and communicate key messages to walkers and runners as well as riders, including codes of behaviour on bike-priority tracks, to ensure non-bikers feel welcome while also understanding their responsibilities.	Moderate	As noted above, anything that helps walkers and bikers coexist safely.
7. Ensure that dog walkers in the mountain bike park are aware of their responsibility to keep dogs on a leash and under control on bike-priority tracks.	Moderate	Relying on information and awareness is not sufficient if not back up with compliance and

Events 8. Limit the number of mountain biking events held in Makarā Peak Mountain Bike Park to no more than 12 per year, to ensure all users have good access to the mountain bike park, while allowing sufficient events to reflect the park's significance as a mountain bike destination, as follows: <ul style="list-style-type: none">• 6 days full park closure per year, and no more than 1 per month;• 3 days partial park closure;• 3 days when events take place with no closure.	High	enforcement. The park is an "on leash" area but it is rarely observed let alone enforced.
Community Work with volunteers 1. Continue to support and partner with the Makarā Peak Supporters Group to implement the Makarā Peak Mountain Park Master Plan.	Very high	
Work with Neighbours 2. Continue to encourage and support neighbouring landowners to participate in local pest animal management / weed control / restoration planting on their land, especially if it contains important native bush remnants or helps connect up or extend the restored forest on Makarā Peak.	Very high	Recognising the halo effect and conversely the detrimental effect that pests and weeds can have on restoration and conservation efforts from neighbouring properties.

General Overview

Guiding principles

2.3 - We support strongly the guiding principles of connectivity (with both other open space but also with urban and residential areas) and community participation. The latter is incredibly important to ensure the success of the OGB.

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General objectives and policies

4.1.2.1 – Policy 4 – What is strategically important for potential acquisitions is not clear but it should include priority being given to under-represented landscapes/ecosystems and remnant native forest. This would tie into Policy 4.2.2.1 policy 2. We also consider it is important that the potential for improved access be recognised.

4.2.1 – Objective 2 – There are considerable healthy swathes of regenerating bush on the western side of the ridgelines on WCC land (and private land) that should also be targeted for restoration and protection. Looking for chances to extend those corridors to the west should also be a focus particularly as habitat for the Capital Kiwi initiative becomes more important.

4.2.2.1 and 4.2.2.2 – Strongly support the policies and actions under these sections.

4.2.2.3 – Strongly support the policies and actions in this section.

In-planting of climax and missing species is working well in Makara Peak and with ongoing maintenance of light wells is providing additional future seed sources for missing species.

We would like to see a specific objective and action associated with the plan to gradually retire areas from grazing. Without control for several years gorse and barberry is quickly establishing itself on the lower slopes of grazed areas, particularly on the western slopes between Johnston Hill and Kaukau. If left unchecked it reduces opportunities to in-plant fast growing native endemic plants to speed up the restoration process. While gorse is a great nursery stock for natives, it's a 25-30 year horizon for a decent native emergent population to establish. That horizon is likely to be substantially longer – maybe a century or more – if barberry is dominant.

4.2.2.4 – We strongly support action A as little is understood about lizard populations and the impacts of predator control and habitat restoration.

4.2.2.5 – We strongly support the actions and policies for weed and pest control.

We suggest goats need to be reprioritised as a pest animal given the focus on retiring grazed areas and plant restoration.

Consideration needs to be given to making it easier for volunteers to carry out weed control using control methods that are available for domestic purposes – that would extend to offering regular training courses for use of common herbicides and tools.

It is noted that Capital Kiwi is not mentioned in the commentary on pest animals on pp42-43.

4.2.2.6 – In light of the proposal to retire grazed areas this section should acknowledge the likely higher fire risk in those areas because of higher grass growth. Planting green belts (eg flax) may be a useful mitigation practice around some of these areas to at least confine/slow down fire spread.

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4.3.2.1 – Policy 3 – We would like to see the mandate to protect and restore indigenous vegetation apply to both sides of the OGB. From a landscape amenity perspective, we can understand the focus on the city side, but from an ecological perspective restoring connections to the west is just as important and will assist with engagement with rural residents.

Policy 6 – It's unclear whether there is a clear need to plant exotic trees for amenity, recreational and wildlife purposes. The OGB and its surrounding already have a surplus of exotic trees and it is not clear whether the focus would be on planting on the neighbourhood parks outside of the OGB. There are many native species that could fulfil these objectives and would strengthen the endemic nature of so much of the OGB and objectives for its restoration.

4.3.2.2 – We support the objectives of progressively retiring grazed areas but as mentioned earlier would like to see a more proactive approach to habitat restoration on lower slopes rather than letting areas revert to gorse/barberry for 30 years plus. Aerial spraying of boundary areas for barberry may not be sustainable and may increase fire fuel loads. We recognise the balance required between the harsh wind and soil conditions, retaining open hilltops for recreation and amenity value, but would like to see restoration attempts made within sparsely gorse/barberry areas before it becomes too dense.

4.3.2.3 – We would support the 3rd policy of allowing plantation forest to age and fall over naturally (subject to safety concerns) as the clearance of such areas would have significant effects on weed sources and destroy native undergrowth for little economic gain. PFSI earnings from these plantations should be able to continue for several decades.

4.5.2.1 - We would support the idea of a camping area that would be accessible on foot or by bike (and not by car). I.e. within 15-20min walk from a bus stop or train station, and not serviced by a car park. That would give quite a different experience to the likes of Kaitoke, Battle Hill etc (would be more like the camping options on the Remutaka Incline, but easier to get to by foot).

4.5.2.3 – We support the policies and actions for the track network, particularly the completion of the Skyline network with lateral tracks is a very important component to ensure connectivity with local neighbourhoods (policy 2).

Action A - We suggest that rerouting tracks or enabling shared use of existing tracks may also be necessary for shelter purposes rather than just steep terrain. The Kohekohe track above Otari is a case in point offering shelter from the prevailing westerly for a traverse on a track well suited to be shared by walkers and riders.

4.7.2.1 – Monitoring – We support proposals to regularly monitor native vegetation, birds and lizards as an important of providing feedback on community efforts to improved habitat for native species. Various community groups are already undertaking citizen science and well established monitoring practices to measure. Increased regular monitoring should be encouraged including outside of KNE areas. Pest animal monitoring is also an essential component.

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Rules

5.3 – policies. We strongly support the policy statements in cl 5.3. In particular Policy 1. To provide for environmentally sustainable activities. However there does not appear to be much carry over of this policy into the rules/policies that follow. In particular the decision-making criteria in 5.3.2.7 only makes a passing reference to “sustainability” in para m. The cornerstone of an ecology and sustainable recreation should be that all managed activities should be assessed against a measure of sustainability. For commercial activities there should be a higher bar of showing a net benefit from a sustainability perspective.

5.3.1 – permitted activities. Query whether geocaching should be a specifically identified activity given it often involves leaving caches in the OGB. It is an activity that encourages exercise, exploration, navigation skills and often involves natural history lessons.

Other

Commercial activities – the Actions do not address the likelihood that there will be increased pressure for regular uplift operators in the park. There is currently a small scale trial of uplift services in the park after which there will be a review undertaken. We suggest there should be a positive or net contribution to sustainability measures required if the commercial activity is not inherently sustainable (ie. Petrol/diesel vehicle uplift). This will help offset the negative effects of the few on the environment and self-propelled users of the park.

APPENDIX 2 – REQUEST FOR FUNDING INCREASE TO IMPLEMENT THE MASTER PLAN

OPEX				
Item	Reason for increase	Current	Requested	Total increase
Vegetation control of the tracks to keep to the correct grade	The current budget covers about 80% of the current track network.	\$40,000	\$50,000 immediately until 2020	\$10,000 to \$20,000

			\$60,000 after 2020 (as more tracks are established)	
Maintenance of existing track network	We are requesting additional funding to keep up with the increasing number of users and additional tracks being built.	\$16,000	\$30,000	\$14,000
Weed Control	Makara Peak is an urban park which has an ongoing battle with weeds.	\$0	\$5,000 or support from the WCC weed control budget.	\$5,000
CAPEX				
Major Structure Renewals and Track Re-builds	The original tracks and structures are 20 years old and require rebuilding and replacement over time.	\$28,000	\$35,000	\$7,000
Total increase from current budget				\$36,000 to \$46,000

CAPEX				
Item	Reason for increase	Current	Requested	Total increase

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Upgrade of 2 smaller carparks recommended in the Master Plan. Para 5. above.	The proposed extension of the carpark will be insufficient in the next few years given growth rates.	\$0	\$220,000	\$220,000
Construction of 16km of tracks recommended in Master Plan. Para 6. above.	Current allocation of funding will be insufficient to build many of the tracks in the Master plan.	\$312,000 over 3 years (proposed)	\$150,000 per year for the next 5 years.	\$438,000

These amounts do not include funding for pest control associated with the Parks status as a significant forest restoration project.

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Submission to the Draft Outer Green Belt Management Plan 2019

20th March 2019

1.0 Introduction

I agree with many aspects of the Draft Outer Green Belt Management Plan 2019 (the 'plan') and applaud the hard work and good intentions of those who have worked so hard to date. In particular I agree with the aspiration to protect the local biota, provide improved access for more people to public lands and to replant many areas of the Outer Green Belt (the 'belt'). However, I **strongly object to the outright prohibition of responsible trail bike use on public land** in the Outer Green Belt and in particular to Management Sector 7- Te Kopuhou ('Red Rocks'). The plan failed to make critical distinctions in its definition and attitude towards responsible trail bike riding and has failed to provide clear evidence to support its proposed prohibition.

2.0 Who am I?

I am a born and bred local Wellingtonian who lives in the southern suburbs. As a recreationist, I ride trail bikes responsibly and have for a long time now enjoyed riding the trails at Red Rocks privately as well as participating publicly in organized fundraiser rides on other areas of the Outer Green Belt. Red Rocks is a convenient 7 minute drive from my house and many of the organized fundraiser rides are within 15 minutes of my home. The only other legal riding location on public land that I am aware of is more than an hour away (55km each-way), in the Akatarawa Forest Park. When riding, my friends and I have always abided by a code of respect that ensures we maintain a respectful and responsible relationship with the environment and those with whom we share the parks. We attend organized beach clean-ups regularly as well as being involved in native replanting projects on public lands. I love our south coast and our rugged western hills and have always enjoyed accessing our lands to engage with nature. For me, the wild south coast around Red Rocks and further to Cable Bay gate is an amazing place for me to get out and experience our environs. It is amazing how so many different people can use the coast in different ways simultaneously and respectfully. It allows me a wonderful engagement with nature and my local environment that I cannot do on my trail bike anywhere else in Wellington. I am one of many other responsible trail bike riders in Wellington.

3.0 What is responsible urban trail bike riding?

Safe and responsible *urban* trail bike riding is the use of off-road motorcycles on designated and formed tracks. Responsible trail bike riding **is not** the free-ranging and reckless riding through native vegetation and sensitive environmental areas, causing permanent destruction to land and life, as is often presumed. Responsible trail bike riding on public land is also not high speed racing. We surely all agree that there is no place for the latter mis definitions. However, we need a place for the former, as there are benefits to society in having responsible trail bike riders included as an approved activity in the public lands management plan.

Responsible trail bike riders are respectful, sensible, reasonable and social members of our community. We take care of our beautiful landscapes and see ourselves as equal kaitiaki of the environment, synonymous with trampers, walkers and other recreationists enjoying their respective approved activities, in harmony with each other.

This is an important note to make at the outset. The proposed management plan has failed to make this distinction and, instead, the proposed prohibition appears to be a manifestation of a low resolution perception or interpretation of what responsible *urban* trail bike riding actually is. A misconception exists of that *all trail bike riders* are somehow irresponsible and dangerous luddites

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who each harbour a flagrant and anarchistic disregard for rules and commonsense and who single handedly destroy the natural environment with their reckless disregard for life and property. This generalist view of all trail bike riding is naive and bigoted. Like all groups there are sometimes those at the extremes who often attract most of the attention and their presence is often conflated with trail bike riding generally. There are also some members of our community who oppose other recreational groups, regardless of the variation within the group.

It is critically important that the council consider a wider perspective and carry out broader observations of our trail bike riding community and our behaviours to ensure it can respond to trail bike riding in the proposed management plan in a higher level of resolution than an otherwise low resolution response derived from a low resolution perspective. The council can only see the picture clearly if it is looking through a high resolution lens.

4.0 Municipal benefits of responsible trail bike riding for the community

In my experience as a responsible trail bike rider, there are a number of advantages and benefits derived from this recreational activity. Responsible trail bike riders typically access the more remote sections of the south coast, where few walkers and mountain bike riders ever reach. This means that we are in the unique position of being able to act as kaitiaki of these parts of the Outer Green Belt. Some of the contributions we make include:

Environmental and property observation and surveillance

Like other park users, riders observe the changes and flux in the environment and landscape and report these to our park rangers and council team. With regular riding around the coast we can build up a strong understanding of the environment and through this can strengthen our advocacy of the coast and contribute towards the ongoing care and management of the area. Moreover, our presence improves security for the private baches and buildings and provides a presence that can deter nefarious behaviour in these remote parts of our city.

Surveillance of illegal fishing

We are often riding around the coast towards Cable Bay and pass by the marine reserve sections of the coast. We often observe illegal harvesting of shellfish and fishing and we report this to MAF officers. This helps MAF to police illegal poaching more effectively than they would otherwise in these more remote coastal stretches.

Public assistance and safety

We provide observation and passive surveillance of the Cook Strait and Karori rip shipping lane from the more remote coastal areas, which other park users cannot access. This provides the coastguard additional eyes to monitor the safety of boaties and recreational fisherman. We can call in any sign of distress if required.

Where riders share the coast with walkers, fisherman/divers and mountain bikers, responsible trail bike riders are known to offer critical assistance in emergencies. I have heard of examples where riders have helped tourists who have strayed too far with too few provisions when the weather has turned, by helping them get back safely to their vehicles. I have shared my first aid kit with a mountain bike group to assist a rider who had seriously injured a leg. I have also heard other examples where a rider was able to retrieve an asthma inhaler from a walker's car as the walker couldn't walk back in the cold wind. Removing responsible trail bike riders from these public areas will reduce the availability of support and assistance in emergencies as well as removing the camaradery that park users can enjoy together in the extremes of our wild south coast environment. We are all in it together.

Fundraising for local schools

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I regularly attend council approved organized responsible trail bike riding fundraising events on the Outer Green Belt public land. These are successfully managed by the Wellington Motorcycle Club. They are very well run, promote safe use of trail bikes and are strong advocates for the care and protection of the environment. The money that the club raises from the recreational riders is donated to local schools. Last Sunday, we met the Principal of Makara Primary School at a fundraising event held on Kinnoull Station. She had come along to help with the sausage sizzle and to thank us all for our ongoing contributions. She outlined the importance of our fundraising to the success of her students learning and explained that they have 70 enrolled children but only two classrooms for them to learn in. The money that responsible trail bike riding provides to schools like Makara Primary are invaluable to the wellbeing of our communities.

5.0 The code of riding for responsible trail bike riders

In all of my experience riding at Red Rocks, I have only experienced positive interactions with park users, who are generally walkers, runners and mountain bike riders. We believe these positive experiences are in a large due to most responsible trail bike riders following a code of conduct when riding on public or private land. This code consists of the following eight rules:

- **Be safe at all times**, with yourself and others around you, wear proper protective clothing always and carry a first-aid kit;
- **Stay on the formed track**, never venture into vegetation or unmarked or protected areas or land;
- **Respect the environment**, this includes:
 - Do not ride over native or protected vegetation;
 - Do not ride in waterways;
 - Do not approach wildlife and stay well clear of wild life at all times;
 - Do not unnecessarily damage the tracks so that they can still be used by others;
 - Carry out all rubbish with you;
- **Follow the rules**, of local authorities for each riding area, follow signs and warnings and stay within designated areas and follow Park Ranger directions at all times;
- **Be respectful of other users at all times**, this includes:
 - Pulling over when approaching walkers, cars, horses , mountain bike riders etc and turning off your engine;
- **Share your plans** with friends and/or family so they know where you will be are riding and when you will return; always carry a cellphone ;
- **Assist others in need**, who are sharing the area if they need help;
- **Always smile and say hello** to those you meet on your ride.

By following these rules, we find that our interactions with other users remain positive and harmonious and there is no cause for animosity amongst the variety of park users. Locally, at Red Rocks, responsible trail bike riders typically ride slowly from the Ōwhiro carpark to Te Rimurapa/Sinclair Head gateway which is the section the majority of walkers and runners frequent. This is because of our expectation that this is the area where most walkers and runners will be enjoying the coastline.

Beyond Te Rimurapa, the number of walkers and runners significantly reduces and the number of interactions also significantly reduce as a result. Our local trail bike clubs also promote respectful riding at all times and they support and reinforce these rules amongst their members. We believe that continuous education and advice is the best way to manage relationships and behaviours while allowing fair and equal accessibility to public land for all user groups, as opposed to the outright prohibition of certain community groups.

6.0 Requirements of responsible trail bike riders

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Being a minority user group, it is not expected that we should always have access to all public land. However, with over 3000ha's of land in the proposed Outer Green Belt there should be the capacity to provide suitable access for responsible trail bike riding. Outright prohibition removes all opportunity for our group to enjoy recreation on public land and I believe this is a low resolution approach to a community group who appear to be poorly understood in the proposed plan.

Like other users, responsible trail bike riders access long stretches of formed tracks. The net area usage of the proposed Out Green Belt area is de minimis, however the tracks should be designated so that they pass through a variety of landscapes and topographies to ensure riders can appreciate the various aspects of the wild south coast and the green hills.

Like other users, recreational riders ride mainly in weekends and public holidays, when we have some time. It is rare and uncommon to ride at night and this is discouraged in sensitive environments as it can be harder for some more inexperienced riders to stay on the formed tracks and avoid wildlife and protected areas of vegetation. Therefore, daylight riding is the principal need of responsible trail bike riders.

The council has, to-date, permitted our trail bike club to use sections of the proposed scenic reserve area in Management Sector 7- Te Kopuhou for organised trail rides and we also encourage you to permit controlled occasions in the future. Responsible trail bike riding should be an approved activity under the proposed plan so that casual (non-organised) access to the this area is maintained into the future.

We also require access for responsible trail bike riding through Te Rimurapa Landscape Feature Precinct, along the formed track/roadway to have access to the the wider coastal area towards Cable Bay which, as has been already noted, is less often frequented by other user groups.

7.0 The basis of my objection to this plan

I fundamentally object to the prohibition of trail bike riders on the belt outlined in the rules and policies of the Draft Outer Green Belt Management Plan January 2019 Section 5.3.3.1 (3). The proposed prohibition is discriminatory, and it unfairly prejudices legitimate public users from the public lands. Further to this, I object to and challenge the prohibition of trail bike riding in relation to the following parts of the plan:

Section 5.3.3.1 (1) states that:

- "Activities are prohibited that are not directly related to:***
- outdoor recreation and public enjoyment of the Outer Green Belt."***

Responsible trail bike riding is *directly* related to the outdoor recreation and enjoyment of the public lands contained in the proposed Outer Green Belt area by those of us who call Wellington home, who continue to pay council rates and support our community and to be involved in environmental initiatives like beach cleanups and replanting schemes.

Section 5.3.3 states that:

"Prohibited activities are considered inappropriate because of the permanent adverse effects on the environment; incompatibility with Outer Green Belt values, characteristics and/or management focus or other approved activities; or where private use alienates public access."

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It is not clear having read the OGBMP in its entirety, what evidence the council has used as a foundation for determining responsible trail bike use as *inappropriate*. This statement is divisible into the following four aspects:

- Permanent adverse effects on the environment;
- Incompatibility with Outer Green Belt values;
- Incompatibility with characteristics and/or management focus of other approved activities; and,
- Where private use alienates public access.

I will address each aspect individually.

Permanent adverse effects on the environment

We have not been presented with any evidence that responsible trail bike riding on formed tracks has any permanent adverse effects on the environment. Mountain biking and walking both cause damage to formed tracks and yet these recreational activities have not been prohibited under this proposed plan. Like these activities, there is no reason why there should be any deleterious effect on biota, heritage, the environmental or any other aspect from responsible trail bike riding on formed tracks.

There is just reason to suggest that the proposed prohibition will increase the net emissions of Wellingtonians wanting to engage in responsible trail bike riding. Local riders currently live within a very short distance of the proposed Outer Green Belt. The prohibition will force riders to drive upwards of an hour north (at least) to the Akatarawa Forest and back for trail bike riding. This two hour return trip will increase travel by about 100km for me and will result in a net emissions increase, well in advance of what might otherwise be the case with local riding on the Outer Green Belt. The proposed prohibition will result in more harm to the environment than non-prohibition, in this respect.

Incompatibility with Outer Green Belt values

Which values specifically are referred to here? Any Outer Green Belt *value* should surely be tested against the proposed plans fundamental vision:

"The Outer Green Belt is Wellington's wild green connector. It visibly defines the edge of the city, protects and connects nature, and invites people to escape and explore."

The prohibition of responsible trail bike riding does not live up to the invitation for *people to escape and explore*.

Incompatibility with characteristics and/or management focus of other approved activities

My objection can be made from two perspectives.

1. ! What is the basis for this claim that responsible trail bike riding is incompatible with other approved activities?

There has been no evidence cited that supports this claim in the management plan. Experience shows me that responsible trail bike riding and other community members carrying out different and simultaneous recreational activities are not mutually exclusive. I find that by exhibiting respect, care and friendliness towards others sharing our public areas, we can all enjoy the outdoors as intended in the plan. The proposed prohibition is a low resolution and lazy approach to the management of trail bike riding on public land. With over 3000ha of land in the proposed plan, there is no defensible justification for this claim.

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2. ! Why has the council chosen to manage potential incompatibilities between other approved activities?

How is it that the council can morally suggest that responsible trail bike riding is not compatible with other approved activities i.e. walking, and yet accept by default a position that some other synonymous relationships between approved activities are compatible i.e. between walking and say, mountain bike down-hill riding? How is it that the council have accepted *activity management* as the method for these activities and yet has been unable to do so with responsible trail bike riding and these other approved activities? At best this looks like lazy planning, at worst it looks like hypocrisy and non-inclusive prejudice

Where private use alienates public access

Given the above reasoning, it has been evidenced in the proposed plan that responsible trail bike riding *specifically* would alienate public access, and certainly that it might alienate public access *more* than any other activity. Has any objective measure been used to reach this predetermined position or has it been based on subjective perception only? Again, with 3000ha of public land in discussion here, is the council claiming that there is no management approach available to act in accordance with its vision statement and the council's wider aspirations of social and community inclusivity. Can the council claim that equal opportunity is being offered to all of its community recreational groups because the proposed prohibition evidences the contrary? The council face being held to account for hypocrisy should this proposed prohibition carry.

Section 5.3.3 also states that:

"The Council will prohibit activities that would have a permanent adverse effect on Outer Green Belt values or would significantly detract from the enjoyment and safety of other park users."

The above reasoning is also transferrable to this statement given it is in large a reshuffling of the previous statement. With regard to the claim that responsible trail bike riding will:

"...significantly detract from the ... safety of other park users."

For the council to make this claim it is surely to have some evidence and measurement basis. How exactly to date, or perceived for the future, will responsible trail bike riding significantly detract from the safety of other park users? Responsible riding necessitates respect for other users including as noted in *the code of riding for responsible trail bike riders*, as included above, slowing down and/or stopping the engine when passing or being passed by others. As with the current and proposed ongoing management of mountain biking as an approved activity and say, walkers, the council have the two activities mutually compatible. Clearly mountain bike riding on public land could significantly detract from the safety of walkers and trampers. However, this is managed in two ways:

1. ! Respect and responsible riding by the mountain bike community
2. ! Designated formed tracks on public land for the sole use by high speed down-hill mountain bike riders

The combination of the two forms the basis of an inclusive management plan that should be achievable in respect to responsible trail bike riding and other park users.

Conclusion of principle objections

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The proposed management plan manifests the council's decision to prohibit the responsible trail bike use by its constituents. The plan does outline a basis or definition for the determination of prohibited activities. However, the plan has fundamentally failed to make the following critical distinctions in the course of determining whether responsible trail bike riding is to be an approved or prohibited activity:

1. ! That the overwhelming majority of trail bike riders ride responsibly and with *de minimis* risk to other park users;
2. ! That responsible trail bike riders are aligned with the proposed management plans fundamental vision by wanting to escape and explore Wellington's wild green connector, the Outer Green Belt;
3. ! That there is a difference between responsible trail bike riding on formed tracks and reckless riding off-tracks;
4. ! That responsible trail bike riding has benefits to the community;
5. ! That the overwhelming majority of trail bike riders ride to enjoy nature and our landscapes and in doing so have a great respect and care for it;
6. ! That there are over 3000ha of public land outlined in the management plan that can be shared and managed for all Wellingtonians alike;
7. ! That there are countless other opportunities for walkers and other users to find a place to walk on public land in our city and green belts whereas responsible trail bike riders have no other access to public land within Wellington;
8. ! That responsible trail bike riders are constituents and should be given fair, reasonable and equal opportunity to access to public land; and,
9. ! That there are alternative options available to council to integrate and manage responsible trail bike use as it has done with the proposed activities.

Where to from here?

I propose that the council reconsider the proposed prohibition and instead embark on a fair and inclusive approach of activity management and integration. Management should/could include a variety of the following methods to do this:

- **Stronger relationships** between the council, responsible trail bike clubs/riders and the other community groups to continue discussions and improve co-operation, inclusivity in the form of good management;
- **More formed tracks** to prevent off-track damage to environment;
- **Continued education** for both responsible trail bike riders and other park users;
- **Designation** of some areas for sole use by responsible trail bike riders either by geography i.e. existing designated mountain bike trails or by time i.e. restricted other users to designated areas at certain times;
- **Additional signage** and guidance at start of trails and along trails;
- **Better policing** of anti-social users on public land, be they inconsiderate dangerous mountain bike riders, walkers who litter the tracks, dogs walkers who don't pick up dog faeces or disrespectful trail bike riders.

I am more than happy to invest time and energy into working with the council to develop/contribute to an alternative management approach which is inclusive of responsible trail bike riders. I also understand that our local riding club, Wellington Motorcycle Club, will be making a submission on behalf of all its members. There is no reason that with so many of us riders committed to upholding and developing responsible practices and working with the council we couldn't find a mutually satisfactory alternative to what has been proposed thus far.

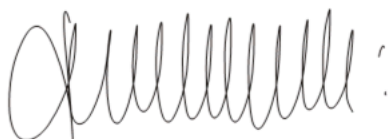
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**Absolutely Positively
Wellington City Council**
Me Heke Ki Pōneke

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Please do not hesitate to contact me if you require any clarification with regard to this submission or if you would like to discuss alternative approaches that will allow fair and inclusive access for all Wellingtonians to our amazing Outer Green Belt. I would like to present my submission in person please.

Yours Sincerely,



James Wallace \$



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First Name:

John

Last Name: *

Baddiley

Organisation:

Wellington Mountain Bike Club

On behalf of:

Postal Address:

Suburb:

Wadestown

City:

Wellington

Country:

New Zealand

PostCode:

6012

eMail: *

Preferred method of contact

☒ Email

☐ Postal

Daytime Phone:

Mobile:

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

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1. Do you agree that the Vision statement on the front of the [Summary Document](#) or in [Part 2 of the draft plan \(starts page 12\)](#) captures what is special about the Outer Green Belt Reserves?

- ☒ Yes
☐ No
☐ Don't know

If not, why not?

2. Looking at the [Summary Document](#) section 'What is the Outer Green Belt?' or at [Part 2.3 \(starts page 13\)](#) and [Part 3 \(starts page 16\)](#) of the draft plan, do you agree with:

	Yes	No	Don't know
The Guiding Principles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Key Values	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Looking at the plan highlights in the [Summary Document](#), do you think these will help achieve the Vision that *the Outer Green Belt...*

	Yes	No	Don't know
is Wellington's wild green connector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
visibly defines the edge of the city	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects and connects nature	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
invites people to escape and explore	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Why/why not?

We believe that the need for ecological protection (and in many instances, ecological restoration) can, and should, co-exist with providing opportunities for recreation. We believe that people's understanding of the importance of ecology, and the unique environment that exists in New Zealand (and has existed in the past in Wellington) is directly linked with their ability to interact with nature. The Outer Green Belt needs to remain a place where all of us can reconnect and interact directly with nature, and not a zoo or a museum exhibit. We also believe that ecological protection and restoration can be directly linked to recreation. We have examples of this in many of the trail areas that the club operates, including Polhill reserve, and the Miramar Trail Project, where dual-use trail development has allowed for more comprehensive trapping programmes to be operated. The WMTBC's triple priority strategy of Trails, Trees and Traps has seen over 15,000 trees planted in the past 5 years, replacing second growth monoculture and areas with pest plants (such as pine, holly and Darwin's barberry) to a diverse native mix of trees.

4. Looking at [Parts 3.6 \(starts page 30\)](#), [3.7 \(starts page 31\)](#) and [4.6 \(starts page 65\)](#) of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

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- ☒ Yes
- ☐ No
- ☐ Don't know

What do you think could be added?

We recognise that the goals and expectations of all users of the outer green belt are not always going to be in alignment. We believe that the management plan should reflect the diverse groups of people that value and use the outer green belt, and support efforts to bring these community groups together.

5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years (refer to part 4.5 of the draft plan - starts page 52). Do you agree that this should be the main priority?

- ☒ Yes
- ☐ No
- ☐ Don't know

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again (refer to Part 4.5.2.3 - starts page 54). [Click here for maps showing the proposed track networks.](#)

6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

	Yes	No	Don't know
Sector 1	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 2	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 3	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 4	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 5	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 6	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 7	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

We support the broad thrust of the draft plan with these sectors 1 and 2, especially with regards to linking the existing trail network (specifically the Skyline trail) through to Rangitihu/Colonial Knob. We support the draft plan proposal for mixed use connector trails from Kiwi crescent to the ridgetop. The extension of Skyline offers an opportunity for an iconic day ride from Rangitihu/Colonial Knob all the way to Makara Peak. This would be an experience that is not available anywhere else in the Wellington trail network, with sweeping views both across the city and out to the western coast. In sector 3, we support the development of a descending singletrack trail from near the Crows Nest towards Silversky, and note that this would help fill a large gap in legal mountain bike access off the ridge between Kaukau and Johnston's Hill / Kilmister Heights. We also support the wider plans for development of mixed use and walker trails noted in 6.3.3.5 (4a-d). In sector 4, the WMTBC supports the proposal from the Western Suburbs Trail Alliance calling for the development of grade

5/5+ trails on the eastern, pine tree-covered slopes of Johnston Hill. The city has a very limited number of difficult, technical or steep trails (grade 5), with 8% (by distance) of the trails in the Wellington network. As the skill levels of riders have increased, there has been a lack of trails to provide a challenge, which has led to unauthorised trail building. We believe that the Johnston's Hill proposal, as laid out in the WMTBC proposal to the council in 2018 provides a measured response to this demand, in an area with limited ecological value, and with limited risk of user conflict. We support the proposal to look for a safe road crossing at the summit of Makara Road, and the recommendations in 6.4.3.5 points 1-6. With point 3, we suggest that a 5-10 year plan for trail development is unnecessarily long, given that the trails would most likely be built through volunteer effort and material investment. We suggest that this trail building could be conducted in conjunction with native replanting and pest eradication undertaken by the MTB community. In sector 5, we support the recommendations of the plan for the Makara sector, including the proposals for a shared use route to extend Skyline to the summit of Makara Peak. We propose that the council re-investigate options to extend a descending and climbing trail into Makara Valley, to provide a connection to Terawhiti. In sector 7, we support the track network as described in 6.6.3.5 (1) - page 175. Brooklyn Trail Builders has proposed a trail network for Te Kopahou (see Appendix 1 - page 8). We believe this can be achieved and meet the requirements of this action point. However, we would welcome an efficient and effective consultation process that does not unduly delay this process. Points of interest should also be considered in this mix. We also query whether 'professional' track builders are required for any assessment and believe ecological considerations can be balanced with recreational opportunities. It is pleasing to note that in the document 'Wellington Regional Trails For the Future (A Strategic Framework for Trails in the Wellington Region 2017)' that Polhill/Te Kopahou is identified as a Regional Trail. Furthermore, The Skyline Track (Spicer Forest to South Coast) is identified as a Signature Track. (See page 29 of the Draft OGBMP). We call upon the Council to work towards the execution of this vision.

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan that would allow for greater accessibility to the Outer Green Belt by a wide range of people.

Is there anything missing that would help?

The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less
- Areas of regenerating native bush won't get damaged

Cons

- Areas won't look as rural

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- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other means to maintain the existing character and views
- People won't be able to see farm animals

8. Do you support the draft plan proposal to phase out grazing animals?

- ☒ Yes
☐ No
☐ Don't know

Why/why not? What ideas do you have to balance out the pros and cons?

The removal of grazing animals may lead to an increased requirement in maintenance to keep less-used parts of the Skyline trail accessible.

9. The draft plan proposes that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones ([refer to the map of the entrances on page 60 of the draft plan](#)). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

	Yes	No	Don't know
Do you support this proposal?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you think it will encourage more people to use the Outer Green Belt reserves?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please rank the proposed new entrances in order you think we should complete them. The new entrances are planned for the Brooklyn wind turbine; Wrights Hill; Chartwell Bush/woolshed; 268 Ohariu Valley Road or McIntock Street; and Ohariu Valley Road or Upper Stebbings Valley.

Ohariu Valley / Upper Stebbings Valley Chartwell Bush/woolshed McIntock Street 268 Ohariu Valley Road Wrights Hill Brooklyn Wind Turbine

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

- ☒ Yes
☐ No
☐ Don't know

Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also considering the management of all of the areas as a connected whole.

The Summary Document lists the key actions for each sector (shown on the Map Page), sector descriptions.

11. [Sector 1 \(Te Ngahere-o-Tawa/Redwood\)](#) is the northernmost part of the Outer Green Belt, extending from the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

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Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

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Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

Yes No Don't know

☒ ☐ ☐

Does the draft plan support community partnership in this sector?

☒ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☒ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

Do you agree with the actions for this sector?

☒ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

12. **Sector 2 (Ohariu Ridge)** runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

Yes No Don't know

☒ ☐ ☐

Does the draft plan support community partnership in this sector?

☒ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☒ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

Do you agree with the actions for this sector?

☒ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

13. **Sector 3 (Kaukau)** extends from Old Coach Road above Johnsonville to the Chartwell Spur above Crofton Downs. It is also the backdrop to Broadmeadows, Khandallah and Ngaio.

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

Yes No Don't know

☒ ☐ ☐

Does the draft plan support community partnership in this sector?

☒ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☒ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

Do you agree with the actions for this sector?

☒ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

14. **Sector 4 (Chartwell/Karori Park)** extends from Chartwell Spur above Crofton Downs through to the Makara Road along Te Wharangi ridge via the Kilmister Tops and Johnston Hill above Karori.

Yes No Don't know

☒ ☐ ☐

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Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

This sector is an important link in the Wellington trail network, and is the location of some of Wellington's original mountain biking trails. Limited mountain bike access has been provided for many years in the Johnston's Hill area, some of Wellington's first downhill mountain bike races were held on the Kilmister Farm dropping from British Peak, and Wellington's first national-grade downhill race was held on a purpose-built track off the ridgeline to the north of the Makara Road summit into Karori Park. The WMTBC supports the proposal from the Western Suburbs Trail Alliance calling for the development of grade 5/5+ trails on the eastern, pine tree-covered slopes of Johnston Hill. The city has a very limited number of difficult, technical or steep trails (grade 5), with 8% (by distance) of the trails in the Wellington network. As the skill levels of riders have increased, there has been a lack of trails to provide a challenge, which has led to unauthorised trail building. We believe that the Johnston's Hill proposal, as laid out in the WMTBC proposal to the council in 2018 provides a measured response to this demand, in an area with limited ecological value, and with limited risk of user conflict. Some critics of the diversification of the OGBMP may question whether mountain bikers already have 'enough tracks'. This is answered by one of the five guiding principles of the OGBMP, which states that the diversity of landscape is a strength of the area. This acknowledges that one of the major attractions of the area is the range of ecology and topography, and this attraction is felt by all user-groups. Where compliant with the general track network policies it is reasonable to assume that mountain bikers would like to partake in a range of grades, locations and environments as much as any other users. We support the proposal to look for a safe road crossing at the summit of Makara Road, and the recommendations in 6.4.3.5 points 1-6. With point 3, we suggest that a 5-10 year plan for trail development is unnecessarily long, given that the trails would most likely be built through volunteer effort and material investment. We suggest that this trail building could be conducted in conjunction with native replanting and pest eradication undertaken by the MTB community.

15. **Sector 5 is Makara Peak.** This sector includes the mountain bike park.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

We propose that the council re-investigate options to extend a descending and climbing trail into Makara Valley, to provide a connection to Terawhiti. Section 6.5.3.5 (8) refers to a proposal to limit events within Makara Peak Mountain Bike Park. We caution that it will be essential that a careful definition of 'event' is developed. Existing MTB events (including the Peak to Creek rally, and our WMTBC Makara Enduro are important both in the mountain bike event calendar, and as fund

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raisers for Makara Peak itself. We recommend that the Makara Peak supporters group is kept central to the definition of events within the park, and that the supporters group is included in the process for approving events. We support the plan proposals to extend the trail network to the south coast, which would create a great opportunity for a nationally significant trail route reaching all the way to Rangitihu/Colonial Knob.

16. **Sector 6 (Wrights Hill/Zealandia)** extends from South Karori Road, across Wrights Hill and the valley of Zealandia.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

17. **Sector 7 (Te Kopahou)** extends from Zealandia along the main ridgeline, taking in the Brooklyn wind turbine, Hawkins Hill and Te Kopahou before descending all the way down to the South Coast.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

In Sector 7, we support the track network as described in 6.6.3.5 (1) - page 175. Brooklyn Trail Builders has proposed a trail network for Te Kopahou (see Appendix 1 - page 8). We believe this can be achieved and meet the requirements of this action point. However, we would welcome an efficient and effective consultation process that does not unduly delay this process. Points of interest should also be considered in this mix. We also query whether 'professional' track builders are required for any assessment and believe ecological considerations can be balanced with recreational opportunities. It is pleasing to note that in the document 'Wellington Regional Trails For the Future (A Strategic Framework for Trails in the Wellington Region 2017)' that Polhill/Te Kopahou is identified as a Regional Trail. Furthermore, The Skyline Track (Spicer Forest to South Coast) is identified as a Signature Track. (See page 29 of the Draft OGBMP). We call upon the Council to work towards the execution of this vision.

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18. Do you have any comments on the [proposed reserve classifications in the draft plan](#)? Please provide the name and/or legal description of the reserve and your comments.

19. Please add here any other comments or suggestions you have in regard to the Outer Green Belt Management Plan.

We note and commend that the OGBMP interfaces with existing management plans (such as the Open Spaces Access Plan (OSAP)), but are concerned that the OGBMP appears to prioritise conservation and ecology at the expense of recreation. This appears to conflict with the vision of the OSAP, which states: 'Wellington City Council wants to strengthen and improve the open space access network through a plan that will: * provide outstanding opportunities for recreation and tourism within the open spaces of Wellington * ensure that tracks provide for a wide range of user interests, skills, abilities and fitness levels within each area * achieve a quality primary network accessing major destination points in Wellington and adjoining districts, and linking with an equitable distribution of secondary and local track networks and recreational facilities * provide a network of tracks that enables more residents to enjoy using the city's open space safely, while enhancing the natural environment.' We believe that the need for ecological protection (and in many instances, ecological restoration) can, and should, co-exist with providing opportunities for recreation. We believe that people's understanding of the importance of ecology, and the unique environment that exists in New Zealand (and has existed in the past in Wellington) is directly linked with their ability to interact with nature. The Outer Green Belt needs to remain a place where all of us can reconnect and interact directly with nature, and not a zoo or a museum exhibit. The language of the Draft OGBMP paints the establishment of trails in a bad light e.g. producing weed corridors and negatively impacting on the environment/ecology. The few weeds that do grow alongside our trails are easily managed because the trails provide easy access. We have no evidence of trails becoming 'weed corridors'. Also, planting trees with fast growing canopies quickly reduces weeds, while improving the local ecology. We also believe that ecological protection and restoration can be directly linked to recreation. We have examples of this in many of the trail areas that the club operates, including Polhill reserve, and the Miramar Trail Project, where dual-use trail development has allowed for more comprehensive trapping programmes to be operated. The WMTBC's triple priority strategy of Trails, Trees and Traps has seen over 15,000 trees planted in the past 5 years, replacing second growth monoculture and areas with pest plants (such as pine, holly and Darwin's barberry) to a diverse native mix of trees. As a club, we have worked closely and fully supported community ecological restoration efforts in our trail areas, including Polhill Protector in Polhill and Te Kopahou, Wild Side in Karori Park, Grow Ahumairangi Forest, and in areas around the Miramar Trail Project. We believe that co-ordination of effort brings better outcomes for everyone, and will continue to work with other community groups in the future.

Attached Documents

File
OGBMP Response - Wellington MTB Club
Outer Green Belt Management Plan 2019

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Wellington Mountain Bike Club submission on the Draft Outer Green Belt Management Plan – 18 March 2019

Introduction

Thank you for the opportunity to respond to the draft Outer Green Belt Management Plan (OGBMP). Our open spaces, including the outer green belt, are an essential component that makes Wellington one of the best cities in the world to live, work and play in.

We note that two of our sub-projects (Brooklyn Trail Builders and the Western Suburbs Trail Alliance) will also be submitting detailed responses to OGBMP sectors of particular interest to them. We fully support their submissions, and thank both groups for the significant volunteer effort that has been made over the past ten years to enhance the trails and environment for all Wellingtonians.

The draft OGBMP is to be commended, both for its comprehensiveness, and its attempt to balance the competing demands of ecology and ecological restoration, use of the outdoors by people, and demands for further development. We have limited our response to those areas in the plan that are of immediate interest to the Club, our members, and the wider MTB community.

The Wellington Mountain Bike Club (WMTBC) is a volunteer-run registered charity that organises mountain bike events, supports and invests in trail development and maintenance throughout Wellington city, and advocates for mountain bike trail access throughout the region. At the time of our submission, we represent 490 active (financial) members, and our 2018 Wellington Enduro Series saw over 1,100 participants (aged from 4 to over 60) compete on some of Wellington's best trails. Our policy is to use events to reinvest into the trail network, and each year we have donated thousands of dollars towards trail and ecological restoration groups in the areas that we compete, including a \$1,000 donation to the Karori Wild Side group following the 2017 and 2018 NZDH (national club downhill racing) events.

This submission has also been endorsed by the Welly Tracks Facebook group (with over 4,000 members).

We note and commend that the OGBMP interfaces with existing management plans (such as the Open Spaces Access Plan (OSAP)), but are concerned that the OGBMP appears to prioritise conservation and ecology at the expense of recreation. This appears to conflict with the vision of the OSAP, which states:

"Wellington City Council wants to strengthen and improve the open space access network through a plan that will:

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- provide outstanding opportunities for recreation and tourism within the open spaces of Wellington
- ensure that tracks provide for a wide range of user interests, skills, abilities and fitness levels within each area
- achieve a quality primary network accessing major destination points in Wellington and adjoining districts, and linking with an equitable distribution of secondary and local track networks and recreational facilities
- provide a network of tracks that enables more residents to enjoy using the city's open space safely, while enhancing the natural environment."

We believe that the need for ecological protection (and in many instances, ecological restoration) can, and should, co-exist with providing opportunities for recreation. We believe that people's understanding of the importance of ecology, and the unique environment that exists in New Zealand (and has existed in the past in Wellington) is directly linked with their ability to interact with nature. The Outer Green Belt needs to remain a place where all of us can reconnect and interact directly with nature, and not a zoo or a museum exhibit.

The language of the Draft OGBMP paints the establishment of trails in a bad light e.g. producing weed corridors and negatively impacting on the environment/ecology. The few weeds that do grow alongside our trails are easily managed because the trails provide easy access. We have no evidence of trails becoming 'weed corridors'. Also, planting trees with fast growing canopies quickly reduces weeds, while improving the local ecology.

We also believe that ecological protection and restoration can be directly linked to recreation. We have examples of this in many of the trail areas that the club operates, including Polhill reserve, and the Miramar Trail Project, where dual-use trail development has allowed for more comprehensive trapping programmes to be operated. The WMTBC's triple priority strategy of Trails, Trees and Traps has seen over 15,000 trees planted in the past 5 years, replacing second growth monoculture and areas with pest plants (such as pine, holly and Darwin's barbary) to a diverse native mix of trees.

As a club, we have worked closely and fully supported community ecological restoration efforts in our trail areas, including Polhill Protector in Polhill and Te Kopahou, Wild Side in Karori Park, Grow Ahumairangi Forest, and in areas around the Miramar Trail Project. We believe that co-ordination of effort brings better outcomes for everyone, and will continue to work with other community groups in the future.

Sectors 1 and 2 (TeE Ngahere-O-Tawa / Redwood and Ohariu Ridge)

We support the broad thrust of the draft plan with these sectors, especially with regards to linking the existing trail network (specifically the Skyline trail) through to Rangitihu/Colonial Knob. We support the draft plan proposal for mixed use connector trails from Kiwi crescent to the ridgetop.

The extension of Skyline offers an opportunity for an iconic day ride from Rangitihu/Colonial Knob all the way to Makara Peak. This would be an experience that is not available anywhere else in the Wellington trail network, with sweeping views both across the city and out to the western coast.

Sector 3 (Kaukau)

We support the draft plan proposals for ecological protection of the remnants of flora and at-risk fauna, and for the restriction of grazing on the ridgetops to protect the trail network, and slowly return the sector to native vegetation.

We support the development of a descending singletrack trail from near the Crows Nest towards Silversky, and note that this would help fill a large gap in legal mountain bike access off the ridge between Kaukau and Johnston's Hill / Kilmister Heights.

We also support the wider plans for development of mixed use and walker trails noted in 6.3.3.5 (4a-d).

Sector 4 (Chartwell – Karori Park)

This sector is an important link in the Wellington trail network, and is the location of some of Wellington's original mountain biking trails. Limited mountain bike access has been provided for many years in the Johnston's Hill area, some of Wellington's first downhill mountain bike races were held on the Kilmister Farm dropping from British Peak, and Wellington's first national-grade downhill race was held on a purpose-built track off the ridgeline to the north of the Makara Road summit into Karori Park.

The WMTBC supports the proposal from the Western Suburbs Trail Alliance calling for the development of grade 5/5+ trails on the eastern, pine tree-covered slopes of Johnston Hill. The city has a very limited number of difficult, technical or steep trails (grade 5), with 8% (by distance) of the trails in the Wellington network. As the skill levels of riders have increased, there has been a lack of trails to provide a challenge, which has led to unauthorised trail building. We believe that the Johnston's Hill proposal, as laid out in the WMTBC proposal to the council in 2018 provides a measured response to this demand, in an area with limited ecological value, and with limited risk of user conflict.

Some critics of the diversification of the OGBMP may question whether mountain bikers already have 'enough tracks'. This is answered by one of the five guiding principles of the OGBMP, which states that the diversity of landscape is a strength of the area. This acknowledges that one of the major attractions of the area is the range of ecology and topography, and this attraction is felt by all user-groups. Where compliant with the general track network policies it is reasonable to assume that mountain bikers would like to partake in a range of grades, locations and environments as much as any other users.

We support the proposal to look for a safe road crossing at the summit of Makara Road, and the recommendations in 6.4.3.5 points 1-6. With point 3, we suggest that a 5-10 year plan for trail development is unnecessarily long, given that the trails would most likely be built through volunteer effort and material investment. We suggest that this trail building could be conducted in conjunction with native replanting and pest eradication undertaken by the MTB community.

Sector 5 (Makarā)

We support the recommendations of the plan for the Makarā sector, including the proposals for a shared use route to extend Skyline to the summit of Makara Peak.

We propose that the council re-investigate options to extend a descending and climbing trail into Makarā Valley, to provide a connection to Terawhiti.

Section 6.5.3.5 (8) refers to a proposal to limit events within Makarā Peak Mountain Bike Park. We caution that it will be essential that a careful definition of "event" is developed. Existing MTB events (including the Peak to Creek rally, and our WMTBC Makarā Enduro are important both in the mountain bike event calendar, and as fund raisers for Makarā Peak itself. We recommend that the

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Makarā Peak supporters group is kept central to the definition of events within the park, and that the supporters group is included in the process for approving events.

We support the plan proposals to extend the trail network to the south coast, which would create a great opportunity for a nationally significant trail route reaching all the way to Rangitihu/Colonial Knob.

Sector 6 (Wrights Hill)

We support the proposals with regards to this sector.

Sector 7 (Te Kopahou)

We note that the Brooklyn Trail Builders have provided a detailed submission on this sector, and the WMTBC supports and endorses the feedback they have provided.

Te Kopahou provides an amazing environment to truly feel engaged with Wellington's unique ecosystem (and weather). The route from the top of Hawkins Hill to the south coast provides some of Wellington's most striking views, and is one of the original Wellington mountain bike routes.

In Sector 7, we support the track network as described in 6.6.3.5 (1) – page 175. Brooklyn Trail Builders has proposed a trail network for Te Kopahou (see Appendix 1 – page 8). We believe this can be achieved and meet the requirements of this action point. However, we would welcome an efficient and effective consultation process that does not unduly delay this process. Points of interest should also be considered in this mix. We also query whether "professional" track builders are required for any assessment and believe ecological considerations can be balanced with recreational opportunities.

It is pleasing to note that in the document "Wellington Regional Trails For the Future (A Strategic Framework for Trails in the Wellington Region 2017)" that Polhill/Te Kopahou is identified as a Regional Trail. Furthermore, The Skyline Track (Spicer Forest to South Coast) is identified as a Signature Track. (See page 29 of the Draft OGBMP). We call upon the Council to work towards the execution of this vision.

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Submission re. Draft Outer Green Belt Management Plan

I have elected to provide a written submission to councillors in this format as I do not feel the online submission form deals directly and/or adequately with my concerns regarding the proposal.

Thank you for taking the time to read this submission. I welcome an opportunity to speak in support of my submission at a hearing.

Background

I am an occasional mountainbiker at Makara (with my children) and a frequent walker (almost daily) on the tracks of Johnston Hill, with my dog.

Matters of concern:

1. I was not aware of this consultation document until very recently. Council have made minimal efforts to notify and publicise the draft plan and seek public feedback. An obvious place to have advised the main affected interest group (namely walkers) would have been at the base of the Circular loop track (Hauraki and Hatton St entrances). The only notification I saw was in the Karori Cemetery near a much less obvious pedestrian access point. This points to a lack of genuine engagement with the community over this proposal.
2. As a result of reading the draft plan and reviewing the Summary Map I have become aware that many tracks on Johnston Hill are designated shared tracks between walkers/runners and bikers. I was very surprised to see this **as I am not aware of any public consultation redesignating these tracks as shared**. Shared tracks create significant safety issues accordingly any decision

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to redesignate tracks as shared needs to have a fully transparent consultative process supporting it. It is very disappointing as a ratepayer to see redesignation without consultation happen and effectively be condoned by the WCC.

3. Sector 4 proposal to consult community about proposed grade 5 mountain bike tracks in pine plantations on Johnston Hill.

I object to the grade 5 mountain bike trail proposal because it will draw mountain bikers away from Makara and into the Johnston Hill /Otari Wilton area and increase mountain bike traffic on shared trails. This increases the safety issues associated with shared trails.

Mountain bikers who want advanced steep technical trails need to have their needs met in the Makara area well away from walkers. This is a safety issue pure and simple.

Furthermore to allow any level 5 tracks in the Johnston Hill area effectively encourages illegal tracks to be built. There are numerous illegal tracks through the pine area already. If council legitimise this activity by making these tracks legal then it is effectively condoning and encouraging the building of illegal tracks in the future.

Finally I urge the councillors to visit the pine plantations before taking any decision re trails. There is significant native bush growing under the pine canopy which in time will result in the area returning to native bush entirely. Given the proximity to Otari Wilton this area should not be open to any biking activity. The damage already done by the illegal trails in this area is stark and obvious. Please do not let this worsen under your watch.

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**Outer Greenbelt Management Plan Review
Submission from WCC's Environmental Reference Group**

20th March 2019

About the Environmental Reference Group

The Environmental Reference Group (ERG) was set up by Wellington City Council. Our role is to provide advice on the best ways to improve Wellingtonians' quality of life environmentally, socially, culturally and economically by protecting and enhancing the local environment.

We carry out that role by constructively advising on relevant Council projects and policies, where possible identifying evidence and solutions, whilst taking into account wider needs, issues and views.

We bring knowledge and insight into Council around the environment, including water, energy, waste, biodiversity, urban design and transport management, in the context of Council's roles and priorities.

ERG members bring to the table not only our own knowledge and thoughts, but also those of the community groups we are part of.

Members of the 2019 ERG group have the following skills and expertise: marine biology, ecology, biodiversity, sustainability, mana whenua and Treaty relationships, management, governance, communication, politics, stakeholder engagement, landscape architecture, engineering, planning, policy, architecture, energy management, freshwater.

ERG would like to be heard in support of its submission.

Submission Parts 1 to 5

1. Overall we think that the Draft Outer Greenbelt Management Plan Review document is well thought-out, researched and consulted and we support it in general terms. The opportunity for the community to submit on the draft is an important part of the development of a management plan for such important natural and recreation assets of the people of Wellington. Details in terms of structure, resource information and the appropriateness of policies will come out in the submission process and a very robust and practical plan should be the result.
2. In the "Outer Green Belt Strategic Framework" diagram on page 10 the following legislation and report needs to be added to the diagram;
 - The Wildlife Act 1953 (Outlines the protection and control of wild animals and birds and the management of game).
 - Fisheries Act 1996 (eels are included in this act)
 - Conservation Act 1987
 - Report of the Biodiversity Collaborative Group 2018 (See note below)
 - Heritage New Zealand Pouhere Taonga Act 2014

Note that the *Report of the Biodiversity Collaborative Group* outlines a draft National Policy Statement (NPS) for Indigenous Biodiversity and provides complementary recommendations, to help halt the decline in biodiversity.

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3. We agree with the key values and functions identified to guide the management of the outer greenbelt. Pages 12/13

“• *Nature*
 • *Landscape and urban edge*
 • *Culture and heritage*
 • *Recreation and access*
 • *Community and identity*
 • *Resilience and city economy.*”

4. We support the five guiding principles of the outer green belt management plan. 2.3 Page 13

“1. Natural skylines, undeveloped ridges and hills, and healthy native forests and streams are the foundation of the Outer Green Belt. The first question, when considering change, use or development will be, ‘how will this affect the natural foundation of the Outer Green Belt?’

2. Continuity and connectivity is fundamental to the Outer Green Belt concept. The Outer Green Belt’s large-scale spatial continuity is key to its natural, landscape and recreational values and its role as the urban edge of the city.

3. The Outer Green Belt’s diversity, of landscape character and outdoor experience, is strength to be reinforced. Continuity does not mean the Outer Green Belt is or should be the same throughout.

4. People’s enjoyment of the Outer Green Belt is grounded in being able to escape to wild places with a strong ‘Wellington’ sense of place. Ensuring activities are accessible to a wide range of people whilst also being appropriate to the ‘wild’ sense of place is important.

5. Community participation in managing the Outer Green Belt is enabled and supported. “

Bringing these areas of reserve and other land together into a single management structure was driven initially in part by the desire to create corridors of native vegetation and for wildlife. This will assume a much more critical need in the future as species are forced to adjust to the growing impacts of climate change. We believe this should come out stronger in the guiding principles against which the body of the plan will be read.

5. We think that 4.1 LAND ADMINISTRATION 4.1.2.1, 1 and 7 as below are of particular importance to the long term protection of the outer green belt and should be carried out as soon as possible, preferably in year 1. Page 34

“4.1.2.1 Reserves classifications, land acquisitions and management mechanisms

1. Identify all Council-owned land intended to be part of the Outer Green Belt that is not a reserve under the Reserves Act 1977 but should be or where the current reserve classification is inappropriate and, in accordance with that Act and the objectives of this Plan, undertake the necessary reserve declarations, naming and classification or reclassification.

7. Ensure that all land within the Outer Green Belt is appropriately zoned in the Wellington City District Plan to ensure the vision, objectives and policies of this Plan are recognised in statutory documents and are considered in consenting under the Resource Management Act.”

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6. We particularly agree with 4.1.2.2 as below. Page 35

“4.1.2.2 Urban containment and continuity

1. Manage the Outer Green Belt as a corridor of protected (Council and Crown land) open space that forms a natural edge to urban development and is wide enough to clearly separate ‘town’ from ‘country and offer multiple open space values’.”

7. We agree with 4.1.2.3, section 3, page 36 as below.

4.1.2.3 Relationship with overlapping plans

3. When future district plan changes and amendments are being considered, seek opportunities to strengthen the Outer Green Belt vision by aligning protection and enhancement of key open space values to nearby private land e.g. protecting significant vegetation on private land.

8. We agree with 4.2.2.2, Streams as below with changes identified in red. Page 38

4.2.2.2 Streams

1. Protect and restore the freshwater ecology in the stream catchments of the Outer Green Belt, including seeps and wetlands, through fencing riparian land, where necessary to exclude stock, riparian planting, avoiding inappropriate discharges including via the stormwater system, removal of any fish barriers and periodic rubbish removal where necessary.

4. Continue to work with Greater Wellington Regional Council to implement a monitoring programme for Wellington City streams using the Macroinvertebrate Community Index (MCI) and of any key freshwater fish populations.

5. Support community initiatives to care for and monitor streams through partnerships and programmes such as Sanctuary to Sea and Whitebait Connection and public campaigns to reduce inappropriate stormwater or land use discharges.

7. Ensure, in granting consent or permitting land use activities, that best practice freshwater management is applied when site works are required near or in which may impact streams e.g. plantation harvest, land disturbance, construction.

Explanation

The Outer Green Belt contains the headwaters of tributary streams flowing into all the city’s main streams including Porirua, Ohariu, Makarā, Ngauranga, Kaiwharawhara, Karori, Silver and Ōwhiro streams as well as short stream catchments draining onto the south coast, such as the Waipapa Stream. The Outer Green Belt is significant for catchment management, a key concept in larger action plans for freshwater in Our Natural Capital. Ensuring the Outer Green Belt is managed properly to protect the upper catchment of these streams is critical to improve freshwater in Our Natural Capital. Restoring indigenous vegetation cover to the headwater land will improve water quality and habitat for freshwater species. (Comment; it doesn’t have to be indigenous vegetation, but the addition of and retention of forests will assist catchment management.)

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*Wellington City is a stakeholder in the Te Awarua-o-Porirua and Wellington Harbour and Hutt Valley Whaitua, a community-led collaborative planning process to carry out Greater Wellington Regional Council's obligations under the National Policy Statement for Freshwater Management. The Whaitua are required to set freshwater ~~usage and quality~~ objectives and **water quality and quantity** limits*, in catchments by 2025 in order to maintain or improve water quality. The Whaitua implementation plans are likely to inform freshwater management in the Outer Green Belt over the life of this plan.*

**Note that the limits are both to protect the environment and limit use to prevent over allocation.*

9. We agree with the need to boost diversity and development of the different plant communities,
 4.2.2.3 Indigenous flora and planting

10. We particularly agree with 4.2.2.4 Wildlife 1, 4 and 5 below;

1. Support the proliferation and spread of indigenous wildlife within the ecological corridor in the Outer Green Belt through weed and pest animal control, and planting to enhance safe and sustaining habitat for native wildlife.

This restoration and protection of the OGB vegetation and the completion of the wildlife links should be a high priority and one of the principle objectives of the plan.

4. Continue to enhance our knowledge of birds, lizards and fresh water fish in the Outer Green Belt through surveys and monitoring programmes.

5. Continue to use opportunities for veteranisation (preserving old trees using arborist techniques to enhance/create wildlife habitat) of old exotic trees such as pines, as has been done at Zealandia.

11. Under 4.2.2.5 Weeds and pest animals Page 41, we support strategic and targeted weed and pest control. The ERG is concerned at the level of resources available for weed control in the OGB especially given the potential for weeds such as Darwin's Barberry to totally change the landscape. The ERG group sees weeds as a major issue and one that needs to be picked up again in the same manner as pest animal control has been. A weed control strategic plan needs to be linked to this document. The ERG would welcome involvement in this issue.

12. We agree with the need to manage fire risk. The safety of people using the outer green belt also needs to be considered with regard to fire risk, 4.2.2.6 Fire. This is particularly the case when scrubby species like gorse and Darwin's barberry takes over grass lands.

13. We strongly support 4.3 LANDSCAPE AND LAND USE, 4.3.1 OBJECTIVES ,

1. To protect the Outer Green Belt landscape as an enduring part of Wellington's identity.

3. To restrict development of buildings and structures in order to protect the relatively undeveloped character of the Outer Green Belt, which people value for its intrinsic natural and visual values.

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14. We particularly support under 4.3.2 POLICIES & ACTIONS, 4.3.2.1 Landscape character
Page 45

"1. Recognise and protect the rugged, relatively undeveloped character of the Outer Green Belt landscape....

5. Recognise the different landscape character in the management sectors ... as the basis for ensuring diversity of places and recreational opportunities within the Outer Green Belt.

15. We think that it is critical that the trials to phase out grazing are closely and effectively monitored, 4.3.2.2 Grazing Page 46. There should be consultation on the proposed areas to be kept in grassland.

"d) Set up monitoring..." should be completed before anything else changes. The ERG group would be interested in the details of the proposed monitoring programme.

16. Under development and land use, 4.3.2.4 Page 49, the words, *"cannot practically be located elsewhere"*, need to be defined and agreed.

17. We support 4.4 CULTURE AND HERITAGE, 4.4.1 OBJECTIVES and Actions with the additions in red below.

1. To **identify**, recognise, protect and interpret the cultural and heritage sites, features and values of the Outer Green Belt.

Actions

a) **Establish a plan to record and manage cultural heritage values. Move this to the number 1 position as having such a plan in place will set a framework for the actions below.**

b) **Develop and maintain an inventory of all ~~known~~ and new sites and features of cultural and heritage interest or value within the Outer Green Belt.**

b) **Where the significance and nature of cultural and heritage sites warrants, prepare heritage conservation plans to guide future protection measures and management.**

c) **Undertake an archaeological assessment of the Outer Green Belt to identify and protect archaeological sites. ~~Any modification or destruction of an archaeological site will need to be guided by an archaeological authority.~~ This is the law so does not need to be stated. It is hard to envisage a situation on the Outer Green Belt where an archaeological site would need "modification or destruction".**

d) **Identify places where planting, regeneration and vegetation may damage heritage, archaeological sites and cultural landscapes including waahi tapu. ~~Establish a plan to record and manage cultural heritage values.~~ Move this to a) above.**

e) **Undertake a study to identify valued cultural landscapes including waahi tapu in consultation with iwi and other stakeholders.**

18. Under "Motorised vehicles, 4.5.2.2 page 53;

- Number 1 below- either prohibit **or** manage. You can't manage something that is prohibited.
- Number 2 below- this is a subset of number 1. What are exceptional circumstances?

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- Number 3 talks about frequency so conflicts with the “one off basis” in number 2 below.
- Maybe just exempt the unpaved road around the coast from the Te Kopahou Visitors Centre from these policies.
- The explanation is quite clear but the policies are not.

1. Prohibit, or manage through specific approvals for, motorised vehicles on the Outer Green Belt, including commercial vehicle-based recreational activities, except as required for servicing, management, emergency and civil defence purposes.

2. Prohibit private vehicle access except under exceptional circumstances and on a one-off basis.

3. Limit motorised vehicle-based recreational use to organised events that have been approved and had permits issued under section 5.3.2 (Rules of this Plan), taking into account, in addition to the criteria in that section:

- *the number of vehicles involved in a given event;*
- *the type of vehicles;*
- *frequency of motorised vehicle events in the particular part of the Outer Green Belt;*
- *the suitability of proposed routes;*
- *the impact on other recreational users and the environment.*

19. We strongly agree that qualified ecologists must be consulted when recreation networks are developed and add that biological hotspots and archaeological sites must be avoided. Page 55.

4.5.2.3 Track network

*“9. In assessing the environmental impacts of proposed track work, seek qualified ecological, professional track building, and, where appropriate, forester’s advice. **Biological hot spots and known archaeological sites must be avoided.**”*

20. Carrying out the recommendations in the “Entrances, amenities and way-finding” 4.5.2.4 section will greatly enhance the recreational experience and should be a priority.

21. We agree with and support all of the Outer Green Belt identity policies 4.6.2.6, page 69 including;

“1. Promote the Outer Green Belt to residents and visitors alike as a formative feature that contributes to Wellington’s reputation as a beautiful, invigorating and liveable eco-city – and the uniquely ‘Wellington’ experience.”

The consequent action is also supported, which is:

“Develop a visual identity for the Outer Green Belt to ensure consistent and appropriate style in site development features e.g. park furniture and signage that reflects a low-key, natural character.”

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However, the way this action is implemented will have a considerable impact on its success. In the explanation that follows, the Plan states that:

"The Outer Green Belt is a prominent feature in Wellington's landscape yet it is still not as well-known as it might be. Its sheer scale makes it is a dominant feature in Wellington's landscape, visible from most parts of the central city and suburbs."

We agree with these points, which mean that the following issues are very important:

"Greater appreciation of what it does for Wellington ... will be important in its protection and management over coming years, in the face of pressures for urban growth."

"The development of a visual identity that can be used in signage, maps and other information will help to raise recognition of and awareness of the whole Outer Green Belt. The visual identity can also be quite subtle, such as guiding the low-key design of site furniture appropriate to the Outer Green Belt's rugged, natural character."

22. Under 4.7.1 IMPLEMENTATION OF PART 4 (GENERAL) ACTIONS page 72, 4.3.3.2 Grazing; setting up a monitoring programme to monitor changes needs to be done before any changes in grazing raceme happens so base line information including invertebrate and lizard surveys is available. Therefore it needs to happen in years 1-2 not years 3-5. If grazing leases are issued then fencing must be a condition. It is not acceptable to continue to lease areas for grazing without requiring fencing. If the grazing is at the instigation of the Council then the Council should fence it before the lease is taken up.
23. Under 4.5.3.4 Entrances, amenities and way finding page 73, a) Prepare a conceptual plan for the main entrances and key off-road destinations/track nodes where facilities are to be developed and identify priorities, timing and funding requirements. This work needs to be done in years 1-3 in conjunction with, 4.6.3.6 Outer Green Belt identity as it will improve people's enjoyment hopefully leading to their desire for the protection of the outer green belt.
24. We agree with the Monitoring plan, Action, 4.7.2.1 with the additions in red.
- a) Set up a plan, **add in conjunction with the Regional Council and community where relevant**, to monitor and evaluate trends and changes in the Outer Green Belt over the next 10 years to inform future management, to cover such things as:
- **freshwater monitoring, add within a freshwater ecosystem health framework, incorporating water quantity, quality, aquatic life, habitat and ecosystem processes;**
25. Section 5.2 Rules-Objectives, calls for the management of activities in a way that recognizes and protects key landscape, natural values etc. There is no specific mention of biodiversity or wildlife corridors. It would be good for the objectives to be more specific. Rather than manage use and development – which is a means – the objectives should be to;
- a) 'Protect biodiversity' and
- b) Provide for the enjoyment and recreation of the people of Wellington subject to protection of the key values of the OGB.

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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26. In section 5.3 *Rules-Policies*, the policies that follow again are fairly permissive without strong statements to give confidence that decisions will protect nature and biodiversity and limit impact. These are currently too open for a controlling authority. For example “*maintain discretion*” in Policy 3 should be “new activities or utilities will not impact on or have limited impact.

Provisions allowing permanent and temporary use of the OGB need to be stronger with clear criteria to guide decision making

27. Under 5.3.2.4 *Leases Licenses and concessions* Page 80, numbers 2 & 3 are wishy washy. “In general” is not strong enough. There should be a complete ban on buildings and any other structure unless these are essential for the well being of the people of Wellington or the management/use of the OGB and cannot be located elsewhere
28. In section 5.3.2.9 *Public Utilities*, it must state that these cannot be located outside the OGB. It is too easy for reserve land to be seen as a cheaper option to buying land outside reserve areas
29. Under 5.3.4.3 *Botanical enhancements*, page 86, these should not include gardens or anything that would lead to assumed ownership as has happened in the past on Town Belt land

Some General Comments

30. Remove all inconsistencies from the plan. Ensure that all tables are clear and properly explained.
31. If an action is dependent on another action having happened, reflect this in the order of the actions and the timing of when they will happen.
32. The rules need to be more closely aligned to the stated aims and objectives.
33. Consider splitting the plan into two separate documents. The first being parts 1-5, the second part 6. This will give parts 1-5 the importance they deserve and will allow part 6 which is more operation to be updated more often.
34. The protection of existing areas of high natural or biodiversity value or biodiversity hotspots (for example Waipapa Stream) is more important than restoration; for example controlling pigs that are digging up the host plants of the existing population of the Wellington speargrass weevil is more important than restoration projects. This is not really reflected in the document.
35. Be consistent about such things as the naming of organisations eg Greater Wellington Regional Council is referred to as Greater Wellington on page 67 and Wellington Regional Council on page 66.
36. Remove all reference to “if funding allows” or similar as this is a given and downgrades the importance of the actions where it is mentioned.

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First Name:

Martin

Last Name: *

McCrudden

Organisation:

Mana Cycle Group

On behalf of:

Postal Address:

Type in your address: Eg. 100 Queen St, 1 Willis St

Suburb:

Tawa

City:

Wellington

Country:

New Zealand

PostCode:

5028

eMail: *

Preferred method of contact

☒ Email

☐ Postal

Daytime Phone:

Mobile:

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

N/A

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OUTER GREEN BELT MANAGEMENT PLAN

HEARING SUBCOMMITTEE

17 APRIL 2019

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1. Do you agree that the Vision statement on the front of the [Summary Document](#) or in [Part 2 of the draft plan \(starts page 12\)](#) captures what is special about the Outer Green Belt Reserves?

- ☒ Yes
☐ No
☐ Don't know

If not, why not?

2. Looking at the [Summary Document](#) section 'What is the Outer Green Belt?' or at [Part 2.3 \(starts page 13\)](#) and [Part 3 \(starts page 16\)](#) of the draft plan, do you agree with:

	Yes	No	Don't know
The Guiding Principles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Key Values	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Looking at the plan highlights in the [Summary Document](#), do you think these will help achieve the Vision that *the Outer Green Belt...*

	Yes	No	Don't know
is Wellington's wild green connector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
visibly defines the edge of the city	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects and connects nature	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
invites people to escape and explore	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Why/why not?

4. Looking at [Parts 3.6 \(starts page 30\)](#), [3.7 \(starts page 31\)](#) and [4.6 \(starts page 65\)](#) of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

- ☒ Yes
☐ No
☐ Don't know

What do you think could be added?

See below in each sector for detail. If we are serious about connecting the green belt for everyone, there needs to be more shared use access points throughout the suburbs, and more local loops for more than just for foot traffic. This increased community use may create more conflict, but it will raise utilisation and reduce vehicle movements, as users will be able to join trails closer to their door. Conflict can be carefully managed through well designed trails with good sight lines and appropriate gradients. Where there are unavoidably steeper gradients a one-way system might

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need to be implemented to ensure general safety and a positive user experience for everyone. In the regional trails framework which we see mentioned, to create a world class trail destination, these are the things that are important to the success. The mentioned trail from Porirua through to the Coast at Redrocks also needs to be a high quality trail, which it is not currently at certain points where there is only a four-wheel drive access trail. Our vision would be a quality connected network of trails for those on foot and bike from Porirua all the way through to the South Coast, with plenty of accessible points along the way for each suburb to get on/off from, and to also help create shorter loops for local communities.

5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years (refer to part 4.5 of the draft plan - starts page 52). Do you agree that this should be the main priority?

- ☒ Yes
☐ No
☐ Don't know

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again (refer to Part 4.5.2.3 - starts page 54). [Click here for maps showing the proposed track networks.](#)

6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

	Yes	No	Don't know
Sector 1	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sector 2	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 3	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sector 4	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 5	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 6	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 7	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

There is a lot of mention for creating local loop trails, short and long. However in each sector there doesn't seem to be that many new sections of trail proposed in each suburb to take users up and back down from the skyline to the end of multiple street entrances to create these so called local loops for every community. These loops also need to be including the fastest growing recreation activity of mountain biking. Foot users are generally spoiled for choice as local reserves are usually classified no biking and a lot of green belt connectors currently aren't built for biking.

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan that would allow for greater accessibility to the Outer Green Belt by a wide range of people.

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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Is there anything missing that would help?

Offering different grade trails including intermediate shared trails with switchback corners would help make an area accessible to not only foot traffic, but mountain bikes as well. Another option is to have gently sloped trails which side lower on the hill and consist of easier grades, which will help make an area more accessible to more users. It would also help form local loops or natural surface off road commuter links that ring suburbs.

The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less
- Areas of regenerating native bush won't get damaged

Cons

- Areas won't look as rural
- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other means to maintain the existing character and views
- People won't be able to see farm animals

8. Do you support the draft plan proposal to phase out grazing animals?

- ☒ Yes
☐ No
☐ Don't know

Why/why not? What ideas do you have to balance out the pros and cons?

Plant small native shrubs and alpine type natives to replace the non native grass. This will need to be managed, as the trails will need to be cleared. This would also reduce the risk of fire that long rank grass would pose.

9. The draft plan proposes that that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones ([refer to the map of the entrances on page 60 of the draft plan](#)). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

	Yes	No	Don't know
Do you support this proposal?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you think it will encourage more people to use the Outer Green Belt reserves?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please rank the proposed new entrances in order you think we should complete them. The new entrances are planned for the Brooklyn wind turbine; Wrights Hill; Chartwell Bush/woolshed; 268 Ohariu Valley Road or

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McLintock Street; and Ohariu Valley Road or Upper Stebbings Valley.

Highest: McIntock, Wind Turbine, Wrights Hill, Upper Stebbings (will become high priority once new development/reserves and trails go in), Chartwell Bush. Ohariu doesn't serve enough population and with all the proposed links and loops for Stebbings become reality (hopefully) then it'll be far more valuable there.

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

- ☒ Yes
☐ No
☐ Don't know

Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also considering the management of all of the areas as a connected whole.

The Summary Document lists the key actions for each sector (shown on the Map Page), sector descriptions.

11. **Sector 1 (Te Ngahere-o-Tawa/Redwood)** is the northernmost part of the Outer Green Belt, extending from the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

Sector one is especially important to us due to it being in our immediate area which we advocate and promote on behalf of. We support the shared climb from Kiwi Crescent and bike priority descent. Having this one way system hugely reduces conflict that a two way trail poses, similar to a narrow Wellington street problem! We would also like to see a more user friendly connection into Linden. Currently the Chastudon entrance provides poor access into the reserve because it requires a road climb to get there and the connection itself is very steep. It is too difficult for most. We propose a new shared connection from either Forglen Place or Katarina Grove. We believe connections are important and we need to ensure that Te Nga-Here-O-Tawa seamlessly connects with the recent Stebbings community plan and sector 2 - This connection needs to be in the plan for the future. Regarding the plan to make the section of Te Araroa designated as uphill only for bikes, we support this, however, there needs to be a logical connection into Ohariu Valley to create that low conflict one way system. The existing road through the middle of the reserve is not ideal and riders will most likely end up riding down the Te Araroa, with the potential for conflict if a provision is

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not made. We would like to partner with Wellington City Council to create a community project to implement these connections and help transform Te Nga-Here-O-Tawa into a thriving local ecosystem. We would help from the scouting of the trails, to pest plant and animal control and replantation of indigenous flora.

12. **Sector 2 (Ohariu Ridge)** runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

From what we have seen in the recent Upper Stebbings Valley consultation, Churton Park will see some much needed green space and connections added, with waterways and the wider area considered. This whole area currently lacks any real green space and natural surface trails, so we strongly support the Wellington City Council investing in ways to close the gaps to grow and connect sector two.

13. **Sector 3 (Kaukau)** extends from Old Coach Road above Johnsonville to the Chartwell Spur above Crofton Downs. It is also the backdrop to Broadmeadows, Khandallah and Ngaio.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

The whole area from North of Makara Road saddle all the way through to Porirua lacks options for people who travel by bike. Sure there is the skyline which is okay on a nice day, but it's a basic farm track. With all the mentions of creating local loops and bigger loops for multiple users, it really is centered around walking. It would be nice if some more provisions for bikes were made. Maybe a descent to complement Silversky trail and lower connecting trail to skirt around the back of the suburbs.

14. **Sector 4 (Chartwell/Karori Park)** extends from Chartwell Spur above Crofton Downs through to the

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Makara Road along Te Wharangi ridge via the Kilmister Tops and Johnston Hill above Karori.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

Nice to see some provisions for multiple user groups across the sector which is currently heavily focused for users on foot. Creating an uphill for shared use and multiple descents for advanced bikers will help fill the gap of our highly focused intermediate grade trail network and broaden the user range catered for in this sector while keeping the conflict down.

15. **Sector 5 is Makara Peak.** This sector includes the mountain bike park.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

Plans look great for the sector. The idea for a better connection across Makara Peak for walking could be a wise idea due to all the high density focus of biking on the hill can be a bit much for those walking. Trail Runners seem to like the park though. We support the continuation of the Makara Peak Master plan and the community initiative between Wellington City Council and Makara Peak Supporters.

16. **Sector 6 (Wrights Hill/Zealandia)** extends from South Karori Road, across Wrights Hill and the valley of Zealandia.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

An investigation into an upgrade, or new trail in Birdwood reserve, is supported by us to create a

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more inviting connection between Polhill and Wrights Hill for all users. This is currently a very awkward connection if you are travelling any faster than walking speed.

17. **Sector 7 (Te Kopahou)** extends from Zealandia along the main ridgeline, taking in the Brooklyn wind turbine, Hawkins Hill and Te Kopahou before descending all the way down to the South Coast.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

We are aware of the sensitivity of regenerating coastal shrubs and would like to see this carefully managed while still allowing future trail projects such as what the Brooklyn Trail Builders have submitted to the long term plan and what they will be submitting to this one. This will ensure we are heading in the right direction towards a world-class trails destination as stated in the overview about the regional trails framework overview. Trails also create great access for predator control, monitoring and replanting.

18. Do you have any comments on the **proposed reserve classifications in the draft plan**? Please provide the name and/or legal description of the reserve and your comments.

Only comments are with the re classification would be to ensure that people on bikes don't lose access to these reserves. Biking is becoming an increasingly popular sport/recreational activity and commuting option. If conflict could be managed in small suburban reserves, we would like to see a connected network of trails for shared use to allow trails in reserves to serve as local commuter options. The demand of local loops off the road and on natural terrain so users can enjoy from their door and reduce their need to jump into the car and all drive to wherever their closest trails are is increasing as traffic on our roads are and awareness of our carbon footprint.

19. Please add here any other comments or suggestions you have in regard to the Outer Green Belt Management Plan.

Comment for Q 10. As our population increases and more suburbs pop up, it is vital to ensure we have green space to get away from paved paths and developments. As mentioned in the document, there is much to appreciate about our Green Belt and in creating access to as many communities as possible to enjoy from their door will just make it more valuable. Overall we believe this plan is a great step to filling gaps in the Green Belt, not only space wise, but also trail connection wise and native re-vegetation. There are many local community groups that would be happy to help. This will create a sense of community ownership and also great value for dollars. Wellington is very unique

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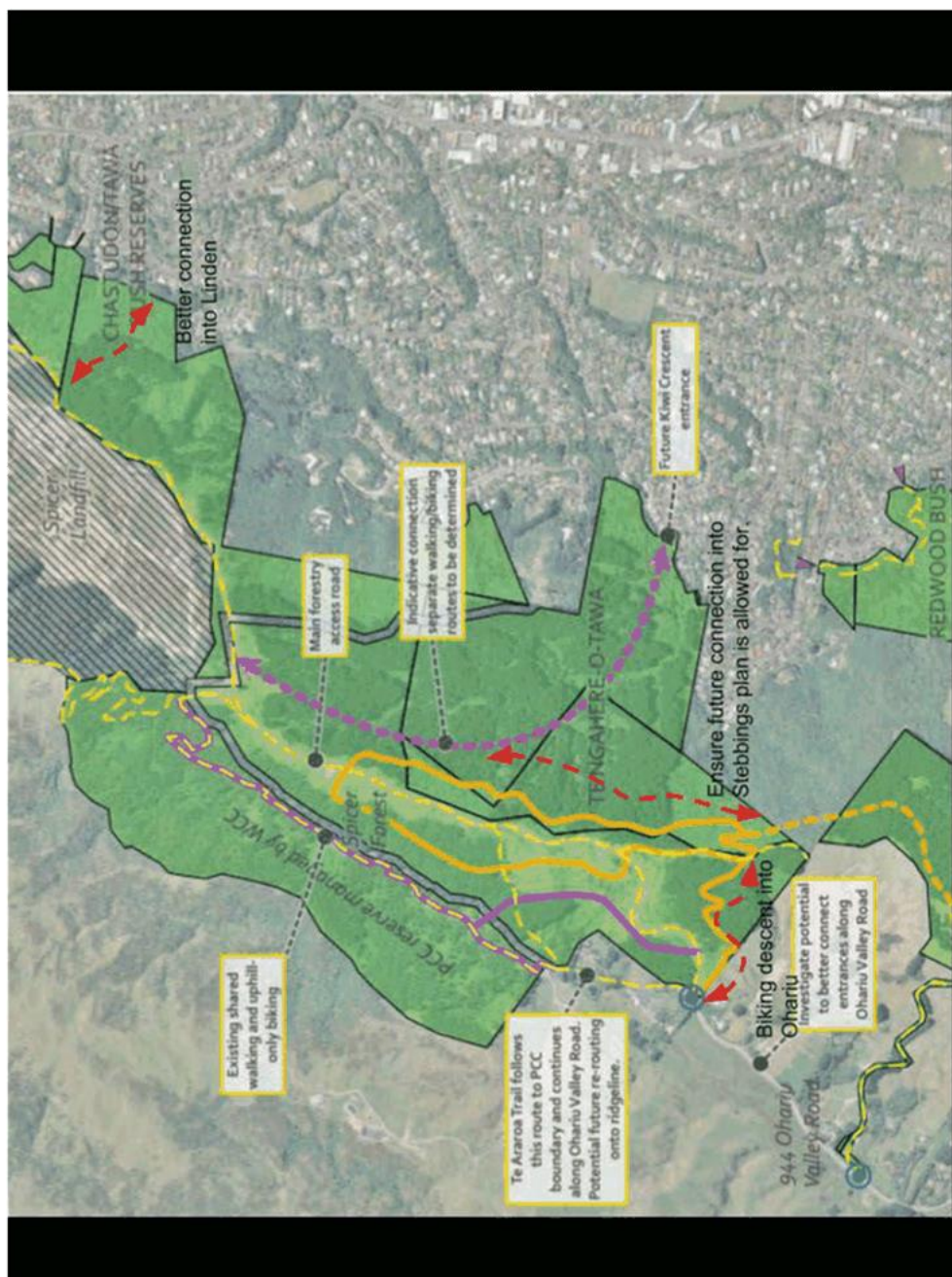
in how close we live to protected crown-owned nature and as the population grows, so should our reserves and need for them.

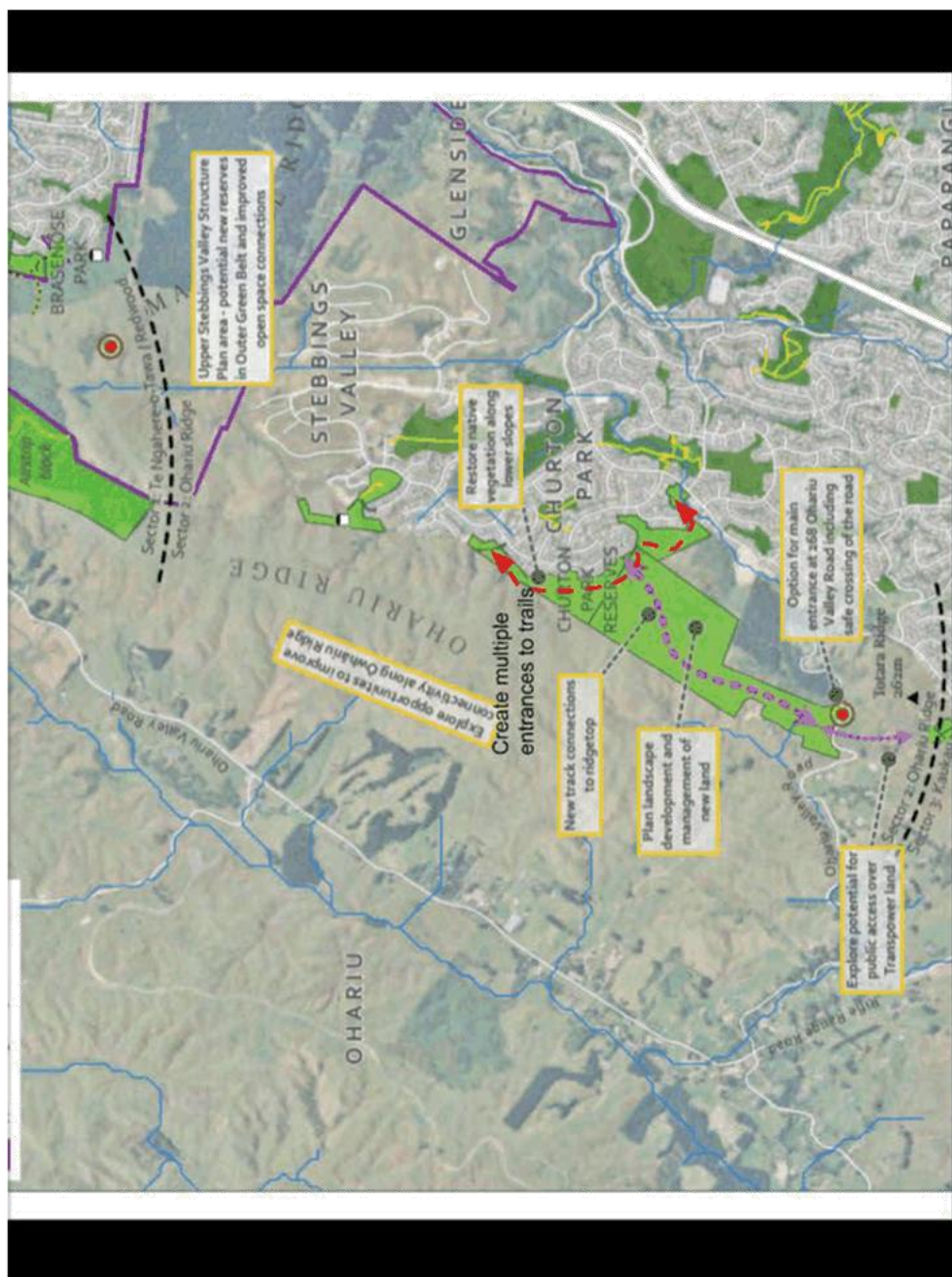
Attached Documents

File
Te Nga-Here Tawa connected
Sector 2 connected
Outer Green Belt Management Plan 2019

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Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

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Please click on the link below to view the document

[https://submissions.wellington.govt.nz:443/Consult24Office/Docs/PID_95/95_11549_B2S2Q6_Te Nga-Here Tawa connected.jpg](https://submissions.wellington.govt.nz:443/Consult24Office/Docs/PID_95/95_11549_B2S2Q6_Te%20Nga-Here%20Tawa%20connected.jpg)

[https://submissions.wellington.govt.nz:443/Consult24Office/Docs/PID_95/95_11549_7NY5H9_Sector 2 connected.jpg](https://submissions.wellington.govt.nz:443/Consult24Office/Docs/PID_95/95_11549_7NY5H9_Sector%202%20connected.jpg)

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**Submission on WCC Draft Outer Green Belt Plan,
March 2019 from Forest & Bird Wellington Branch**

Emailed to: outergreenbelt@wcc.govt.nz



Our Details

Name	Mike Britton
Address	Chairperson, Forest & Bird, Wellington Branch, [REDACTED], Wellington 6140
Email	[REDACTED]
Phone	[REDACTED]
We are making this submission on behalf of an organisation: Forest & Bird, Wellington Branch	
We wish to be heard in support of this submission	

INTRODUCTION

Thank you for this opportunity for Forest & Bird's Wellington Branch to provide Wellington City Council (WCC) with comments on the 2019 Draft Outer Green Belt (OGB) Plan. As a major stakeholder in the Plan, we offered comments in February 2017 and January 2018 and we are grateful to have this further opportunity to add to those initial thoughts. For completeness, we have incorporated much of our earlier thinking into this current review.

Our perspective of the Outer Green Belt

Geoff Park's introduction¹ quotes a passage written by John Pierce in 1840 describing the sheer joy of being "... amidst the most luxuriant foliage ..." probably describing the scene near Korokoro Stream.

The introduction also observed that, a few years after John Pierce called Wellington "the most magnificent port in the world":

"... the ancient forest he so admired was gone, forever it would seem, incinerated in settlers' fires ..."

Despite this reflection the author was optimistic in tone, observing that, after the destruction by fire and farming and in a little over a century, the process of rejuvenation:

"... had advanced to the extent that Wellington was effectively surrounded by a new forest, a forest this time appreciated as an asset to the city as an integral part of its 'open space' ..."

He concluded that:

"... the new forest will never be the same as the forest teeming with birds ..."

and even by artificially re-introducing northern rata and podocarps it will take centuries for these trees to reach maturity and have the role in the forest they did in John Pierce's day.

¹ An Inventory of the Surviving Traces of the Primary Forest of Wellington City, compiled for Wellington City by Geoff Park, February 1999

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Forest & Bird is committed to the long journey that Geoff Park said would be needed. Zealandia is part of that commitment and plays a significant role in bringing back the birds, tuatara and other fauna. Restoring the biodiversity of flora as an intact forest along the Outer Green Belt is the other essential element. It is the refuge of sufficient size and continuity that will enable birds to move north and east from Zealandia.

The Natural Kiwi project to re-introduce kiwi to the wild in Wellington is an exciting and relevant part of that journey and so too is the Pest Free Wellington initiative. We also acknowledge the contribution made by Greater Wellington Council in controlling possum numbers, which was the catalyst for the recovery of bird life and flora we see occurring in the gullies and reserves of the Outer Green Belt and surrounding area.

The spread of invasive plants is a major concern for the Outer Green Belt and possibly the most difficult to control; however permitting it to go unchecked is not an option. Nature will reclaim the hillside and ridge tops — our primary role is to eliminate the pest plants and animals and assist the biodiversity expansion of native flora and fauna.

The Forest & Bird journey began in earnest in 1990 with the Branch publication *Natural Wellington* which pre-dates Geoff Park's assessment and the WCC publication *Capital Spaces*.

General Comments

Corridors: In the current draft Plan, there is a recognition of the need to introduce or safeguard areas of indigenous vegetation and the establishment of an ecological corridor but it does not appear to be the main focus nor an important part of this Plan. We would like to see more detailed planning of how this aspect of the Plan is to occur.

Weeds: The threat posed by Darwin's barberry is documented in the Plan but there is little change (if any) in the approach to resolving this issue. In fact, the threat of Darwin's barberry to the OGB is mentioned mostly to state that the problem is too large to be resolved, except in Te Kopahou, where efforts to reduce its spread are to continue. As we are well aware, in the northern sectors Darwin's barberry, together with gorse, is spreading rapidly and widely. Continuing with the same policy will yield the same result!

The transition area between the urban and rural parts of the city is referred to several times but the desired form of this zone does not seem to be clearly or consistently stated. In our 2018 review we expressed a strong desire to see a more ecologically satisfactory treatment of the use of the OGB as a transition **zone** between the urban and rural areas but this has not been reflected in this draft of the Plan.

Goals and objectives are more clearly expressed than in the earlier draft, although in some cases lack of clarity persists. The general thrust is positive, but some of the objectives lack sharpness, starting with words like "support" or "work with". The new Section 2 (Vision and Principles) contains some helpful principles, but these do not seem to be strongly carried through to later sections.

Tracks play a critical part in the success of the OGB both as an ecological corridor and a recreational space. It is clear that the treatment of mountain bike use will be a significant factor in this success. We are very concerned for the safety of walkers, runners and family groups who use the OGB and we are strongly against shared walking and mountain bikes on all but the few major tracks.

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Detailed Review by Section

1.1.1 The Outer Green Belt

"... for multiple environmental, recreational and social objectives ..." [third line]

Comment

This can be stated as: "... for environmental, recreational and social objectives ..."

1.1.2 Purpose

Ecology

The Plan makes reference to *Capital Spaces* and shows its status as a founding and influential document. The *Outer Green Belt Management Plan May 2004* quotes that document's Vision Statement clearly and deliberately links the purpose of the Outer Green Belt back to its origin:

*Indigenous vegetation restored for the purpose of establishing **an intact biodiverse ecological corridor is the key purpose of the Outer Green Belt.***

The 2004 document in its introduction traces the history of this commitment which, over time, has taken greater prominence and importance in strategic planning. This section in the Plan needs to include an acknowledgement of the ecological purpose.

Co-operation

"... to promote co-operation between the Council, neighbours, stakeholders and the community in regard to managing the Outer Green Belt ..." [Purpose 3, page 5]

We question how the Council intends to promote co-operation with owners of adjacent land. Under the current arrangement they are 'partners', albeit in an informal sense, but the relationship does encourage dialogue. We understand the legal rationale but question whether exclusion from the Plan will enhance co-operation. Former 'partners' become observers and neighbours.

What are the implications of removing private land from the scope of the Plan, particularly with respect to development that is contrary to the OGB purpose, ie vegetation clearance and invasive plant management?

1.1.3 Scope

Landscape protection

*"... the Ridgelines and Hilltops overlay in the Wellington City District Plan has become operative, providing a protective statutory mechanism **for landscape protection** over the private ridgetop land in the Concept Area."* [1.1.3 bullet 2 page 5]

We are not aware of a definition of "landscape protection". The landscape in the OGB at the moment is not how we would like it to remain. A purpose of the OGB Plan, in our view, is to return the landscape to one that existed prior to the vegetation clearance by European settlers. The landscape will change naturally — and at the moment it is changing to gorse and Darwin's barberry on land that was formerly grazed on the tops and eastern slopes around Mt Kaukau summit.

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We question how the ridgelines and hilltops overlay, in a practical way, provides protection for native fauna and flora within the OGB and on land adjacent to it. Are private landowners and contractors obliged to maintain biodiversity and protect native flora and fauna within this overlay and how is that achieved?

1.1.4 Timeframe

Continuity

*"... as a second in a series of ongoing management plans that will be **progressively** reviewed and updated **over time**; always with a much longer-term 50 to 100-year and beyond vision in mind."*

We see no evidence of a long term vision in this document nor any progressive update over time. Refer to our comments under section 2 Vision.

Time scale

Changes in the ecology will occur naturally over time and at a pace slower than the lifetime of these plans. All we ask is that this progress is not impeded by changes in priority, recreational activity and ridgeline "protection" — and that the transition to native flora is actively encouraged and assisted (accepting that popular tracks need to be kept safe and open) over the many iterations of the Plan.

1.1.6 Where does this Plan fit in the Council's work?

We suggest this title be amended to: Outer Green Belt Strategic Framework, which is the title of the diagram on page 10.

Reserve classification

"This management plan is being prepared under the Reserves Act 1977 ..." [1.1.6 bullet 2 page 7]

"It provides for working in partnership with neighbours and communities towards the Outer Green Belt vision ..." [1.1.6 bullet 2 page 7]

We support this initiative. Refer to our comments under Section 4.1.2.1 page 34.

1.1.7 Funding and Reporting

Funding model

"The funding is prioritised and set through the Long-term Plan and Asset Management Plans ..." [1.1.7 para. 1]

"There is potential every 3 years ... to provide submissions ... This may include advocating for additional investment in support of this management plan's objectives ..." [1.1.7 para 2]

The existing arrangement for the allocation of funds can be distorted by vocal and well-resourced recreational lobby groups and over three successive 3 year cycles this distortion can be significant. There is no *de facto* advocate for the Reserve Act's statutory provisions intended to protect and preserve New Zealand's ecology. The funding process itself must provide that 'balance' so that the ecological aspect of the Plan — ie pest control and removal of invasive exotic plants — is well funded.

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The Plan should include an anticipated Opex and Capex budget for its 10 year term and as a minimum ensure there is a realistic allocation to meet the obligations under the Reserve Act.

The natural biological process of rejuvenation is not a recreational activity and has a timescale measured in decades.

2 Vision: Wellington's Wild Green Connection

"The Outer Green Belt is a continuous green belt following the ridges west of the city from the South Coast to Colonial Knob, in which indigenous vegetation is restored and an informal recreation network is widely accessible" (Capital Spaces, 1998)

This is the vision carried forward from 1998 in the *Outer Green Belt Management Plan May 2004* and should continue into this Plan and be supported by a narrative that elaborates on that vision. This approach was used in *Our Natural Capital*.

'Vision' means to see and plan the future with imagination and direction. The narrative enables the reader to 'see' that vision of the future and be motivated to play their part in the journey. Our volunteers say they want to be involved with something that is meaningful and has lasting value.

A vision statement should remain for the duration and not change with each update of the 10 year plan. It gives continuity and direction across the generations who will work to achieve this future ie planting tawa and rimu now for that future. This is exemplified by the two examples noted in the text on page 25, that of Zealandia and Ōtari-Wilton's bush.

The narrative can take inspiration from early settler accounts like that of John Pierce's and descriptions provided by Māori — eg Mt Kaukau's alternate name of Tarikākā meaning 'where the parrots rested' [3.4.1 para. 3]. We suggest wording that evokes emotion and a desire to achieve, something along the lines:

The vegetation and stream environment supports an abundance of fauna including numerous species of birds, invertebrates, reptiles and fish. There is considerable diversity in habitats owing to the variability of valley, hillside and hilltop conditions. The unbroken line of forested hillside and occasional hilltop are dominated by tawa and rimu and alive with the presence of kererū, kākā, korimako and the lilting sounds of kōkako. The high peaks are a maze of hardy shrubs and native grass species. Kiwi can be heard at night and at day break a cacophony of bird song emanates across the hillside of the Outer Green Belt of Te Whanganui ā Tara.

This can be supported by objectives:

- Recovery of the flora and fauna native to the area
- An ecological corridor exists
- The ecological corridor is robust without weakness or gaps
- The ecological corridor is protected from harm by educated and supportive residents and visitors
- Absence of exotic plants.

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2.2 Why is the Outer Green Belt Important

We suggest the title be amended to read: "Why the Outer Green Belt is Important".

Benefits

"The Outer Green Belt has multiple open space values and increasingly acts as the green buffer between town and country ..."

"... wide range of interrelated benefits including amenity value, biodiversity and landscape protection, recreation and social opportunities, ecosystem services ..."

The phrases like "green buffer", "prominent role" and the shopping list shown above do not tell us anything about why the Outer Green Belt is important.

We would like a tangible explanation of the benefits. In place of "increasingly acts as the green buffer" we suggest the explanation in the 2004 document to be more meaningful — ie "The Outer Green Belt marks the western edge of the city's urban environment."

2.3 Guiding principles

General comments

- a) The terms 'natural values' and 'desire to preserve the character' are used to describe the Outer Green Belt as it is, but it is not in its natural state — it is farmland that is recovering from years of grazing and other factors. [3.2.1 para. 2]. It is recovering from its colonial past and should be nurtured and allowed to recover to its natural form. There will be parts where a forest will occur and parts that will remain more open and windswept.
- b) A walk along the length of the Outer Green Belt in the future should be a journey of discovery (like a good novel) where the interest is in the variety of that journey from mushrooms and orchids to kākā, tīeke, rimu and kohekohe; the wind sculptured and the sheltered dampness, the wider vista and the steep inclines. This is what will make the Outer Green Belt special ... it does not exist now but it would exist in the future with a 500 year vision.
- c) We understand and agree that there should be provision within the ecological corridor for walking and non-invasive activity ie recreation, but the 'balance' of "open tops maintained for its suitability for recreation" [2.3.1 pp 15] does not take account of the track network in the space on the hillsides where the forest is permitted to develop! The balance is clearly tilted towards recreation.
- d) The OGB's natural values and its role as a continuous Northwest-Southeast ecological corridor are the key to the aims and objectives of *Our Natural Capital*. ... "Many of the programmes and work undertaken or referred to under this plan align with the objectives and actions of that strategy" [3.2.2 Nature Today]
- e) Protecting wildlife within the OGB we see as a primary objective of an ecological corridor and should be separately identified as a Principle. Habitat zones for lizard, bird and invertebrate life have to be of sufficient size to provide protection for vulnerable, rare and at risk species both fauna and flora, from people and our pets. The "forest" and (native) grassland is habitat of our fauna — recreational activity and track layout must support this objective. We are concerned that if all the activities listed in section 3.5.1 were to be encouraged the OGB will become a very large playground with

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nature as a secondary consideration and a convenient backdrop — a repeat of the Town Belt example.

- f) The Plan states in Sections 3 and 4 of the text that *'Our Natural Capital'* is a pivotal document that sets out the ecological reasons for the OGB. The importance of this document and its provisions should be included in the text in Section 2. It should also be referenced under a Principle specifically for the protection of wildlife and its values.
- g) This draft has an emphasis on recreation with little attention to the needs of wildlife even though the 2017–2018 survey [page 20] showed overwhelming support for the activities that support wildlife — and found the top three most important features to be Native Bush, Ridgeline and Wildlife.
- h) Public recreation is not a recent major use within the OGB [3.4.3 last para.]. However, mountain bikes *are* and we are concerned at the rapid increase in track building primarily for this activity [2.3 para. 1, pp 13; 3.4.2 para. 4]. This trend is likely to continue if more tracks are built and mountain biking becomes the dominant activity. This would be unfortunate since the 2017–2018 survey [page 21] showed that 70% of respondents undertook foot-based activity [page 28] but the level of support for walking in Makara Peak (a mountain bike area) was lower than the other areas.
- i) Forest & Bird members ride mountain bikes too; however, in this submission we are representing the voice of nature and we request that the Plan include controls to contain further mountain bike tracks and to concentrate this activity in areas where it is well established — at Makara Peak, the Wild Side of Karori Park, the South Coast — and also take into account the Porirua Adventure Park expected to be built on Colonial Knob in the north.
- j) Such a policy will keep a large portion of the OGB safe for the peaceful enjoyment by walkers, runners, the old, young and picnic groups to interact with the surrounding nature. It would also limit the amount of vegetation cleared to provide for mountain bike only tracks and retain the integrity of the OGB as a wildlife corridor.
- k) Mountain bikes and walking are not compatible activities. Bikes are not permitted on city pavements for obvious safety reasons. In the OGB on dual use tracks the risks of injury are far greater. Walkers and families, particularly those with young children, will be deterred from using these tracks. For safety and for peaceful recreation by walkers, family groups and runners, mountain bikes should be confined to bike-only tracks.

Principle 1. Natural skylines, undeveloped ridges and hills, and healthy native forest and streams are the foundation of the Outer Green Belt

- a) There are two objectives in this principle:
 - a skyline that is free of development
 - a continuous corridor of healthy native forest and stream ecology
- b) We note and agree that a natural skyline free of development will include both forested and native grass-covered ridge lines.
- c) We agree with the desire to preserve natural ruggedness as a prime purpose. We also agree that context is appropriate in a management plan. However, we expect definitive statements — not questions as posed in the first paragraph under this heading on page 13. It may be rhetoric but it is not helpful in this document.

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- d) Since the question has been posed we submit that any use or development must be unobtrusive and respect the peaceful and natural character of the environment. Tracks should merge with the contours of the land and blend into the ecological processes of that space to be as unobtrusive as possible; this has to be the overriding benchmark. Harmony with, and discovery of, nature is the experience that the Outer Green Belt can offer and be remembered for by its visitors.

Principle 2. Continuity and connectivity is fundamental to the Outer Green Belt concept

- a) We support the objective here of a large scale continuous natural landscape.
- b) The value of a continuous wild corridor is that it provides the means by which wildlife can adapt to changing climatic conditions. Plants create distinct localised ecological communities that provide habitat for invertebrate diversity.
- c) The OGB is a perfect ecological laboratory. It is an opportunity for a longitudinal study of the natural process of transformation over a very long time scale and increase our knowledge of the native fauna and flora; the climatic impact; and introduced pest plants. This point is made in section 3.2.2 page 20 “... *Research, which is a strand in Our Natural Capital, is important to help understand how best to manage nature in the Outer Green Belt...*”.

We do question the term “manage nature” and suggest “assist nature” would be a more appropriate term.

Principle 3. The Outer Green Belt’s diversity, of landscape character and outdoor experience, is a strength to be reinforced

- a) The accompanying text under this Principle is clearly focused on recreational enjoyment. We are wary of the phrase “*optimal approach*” and what weighting this principle will give to ecological connectedness and biodiversity.
- b) We would like to see constraints applied to these focus areas so as to retain the ‘wild’ and remote character of the OGB for its primary purpose as a natural ecological corridor in its raw state.
- c) We agree that horse riding and mountain bikes should be confined to specific locations and not interfere with the enjoyment of walkers and joggers or impede the natural process of recovery and regeneration.
- d) We support the need for comfort stop facilities and emergency shelters and freedom camping in defined areas for walkers on the Te Araroa Walkway. It would be a wonderful experience for these people to be in nature, yet so close to a city.

Principle 4. People’s enjoyment of the Outer Green Belt is grounded in being able to escape to wild places with a strong ‘Wellington’ sense of place.

- a) Exposed ridge lines are ‘wild’ because of the harsh climate. In Wellington homes located in exposed places (and even in the City centre) the ‘Wellington sense of place’ can be experienced. The weather and terrain are the dominant feature of Wellington. The value of the OGB will be its wildness as a living forest and grassland landscape in contrast to the city’s Town Belt parkland.

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- b) The OGB *is* a wild place, it is exposed to both north and south and can be a dangerous place to be in certain weather conditions without appropriate clothing, preparedness, and a reasonable level of fitness.
- c) It is not clear how this Principle differs markedly from Principle 3 since they both focus on recreation. We suggest these Principles can be merged; the wild character of the OGB is a feature of the climate and not something that can be managed.

Principle 5. Community participation in managing the Outer Green Belt is enabled and supported.

- a) European settlers milled and burnt this area for farming, industry and settlement and destroyed all but a few remnants of its natural biodiversity. Individuals, Forest & Bird and other groups have been working for decades to rebuild this lost biodiversity. We would like this to be reflected in the text in place of the example on page 14.
- b) This is voluntary work where people give up their leisure time to help rebuild a lost natural landscape. Trapping, planting and weed removal [3.5.1 para. 4 page 28] is to improve the biodiversity and wildlife habitat and it can be hard work. It is 'recreation' only in the sense that it is rewarding and provides a diversion from life's stressors.

2.3.1 How will the Vision and Principles be applied

- a) The title to this section is odd. We suggest changing the position of 'will' such that the title reads: How the Vision and Principles will be applied.

Our Natural Capital and Biodiversity

- b) We would like to see *Our Natural Capital* as the core reference for decisions about the OGB because of the OGB's pivotal role in achieving the biodiversity objectives set out in that document [3.2 Nature].
- c) Part 1 Strategy, 2 Introduction in *Our Natural Capital* outlines the value of "ecosystem services" and also New Zealand's obligation to protect our endemic species, many of which are nationally at risk, in decline or worse. The OGB provides us with the opportunity to fulfil this obligation and restore much of the lost biodiversity of Te Whanganui-ā-Tara as a priority.
- d) The extent of our lost biodiversity is expressed in Section 3.2.1 of this Plan which states
"All the vegetation and stream environments would have supported abundant fauna including numerous species of birds, invertebrates, reptiles and fish."
"There would have been considerable diversity in habitats due to the variability of valley, hillside and hilltop site conditions ..."
"... the OGB would have been almost continuously covered in forest ..."
"On the highest peaks ... the harsh climatic conditions and poor soils would have seen vegetation dominated by tough wind-sculptured species ..."
and these areas are therefore naturally open. It is these peaks that people go to to get the wide vistas.

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Balance

- a) The commentary in this section implies there exists an equilibrium between nature and people's recreational activity. We contend that there is no such balance and that the Plan needs to focus on achieving Principle 1 and align with *Our Natural Capital's* emphasis on biodiversity as its primary task. The intrinsic value of the OGB as a restored assemblage of ecosystems is immeasurable not only for Māori [section 1.1.8 Mana Whenua obligations] but also the local community and internationally.
- b) We fear that the statements in the text of "*ridge tops maintained for its suitability as a recreational environment*" and the OGB's use for "*a range of outdoor recreation*" are more applicable to a city park than a wild and natural ecological environment. The section also discusses "...*weighing up the most suitable combination of environments and activities...*" and "...*a balance is struck*" ... between the first principle ie undeveloped ridge line and native forest and the other principles.
- c) We do not accept that ecological restoration should be confined to the flanks and valleys (as stated in the example on page 15). We see native vegetation that naturally occurs on the open ridge tops to be of equal value to the biodiversity of the OGB as the forested flanks, and not secondary to "*suitability as a recreational environment*" [page 15 para3]. These plants have also suffered from the ravages of farming and competition from exotic species and are of value to our biodiversity.

3 Description / Key Values

District Plan

- a) There is a circularity occurring between the *OGB Plan* and *Our Natural Capital* which is particularly noticeable in this section. Reading both documents it is clear that each is reliant on the other.
- b) We believe there is a case for creating a District Plan specifically for the OGB to focus on the special (pivotal) role that the *OGB* has for biodiversity recovery as stated in *Our Natural Capital* [3.2.2 Nature Today].
- c) The relevant elements of *Our Natural Capital* could be incorporated into the *OGB Plan* and form the core of an *OGB District Plan* with rules appropriate to the objectives of *Our Natural Capital*. It would elevate the *OGB* in status and provide for specific governance criteria.

3.1 Vital Statistics

We note that the Forest & Bird nursery has supplied more than 100,000 plants to Zealandia and restoration groups over 20 years.

3.2 Nature

Ecology

- a) The title of section 3.2 is 'nature' which is used throughout the document. Nature is a word that encompasses all things that are not human or a creation of humans. We consider that in the context of the OGB 'ecology' is the appropriate word and more accurately describes the aspect of nature that is of importance to the OGB vision. We

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would like to see the heading of Ecology carried forward into this Plan from the 2004 Plan.

- b) We would like to see the descriptive and factual narrative in section 3.2 Ecology of the 2004 issue retained as an appendix to this issue and carried forward. It will provide historical context for future readers and a sense of continuum and continuity to the OGB vegetation process. It would serve as a valuable record of progress in the one document.

Darwin's barberry

- a) In the 2004 Plan in section 3.2.3 Future Ecology it states in the fourth para.

"That ... over time, retired and protected areas generally progress to a taller and different mix of plants, often with exotic shrubs being overtopped by the taller indigenous forest species. This process is well understood and fairly predictable where the main exotic species is gorse. Where the main exotic species is Darwin's barberry, the long term process is less well understood and is being investigated ..."

- b) The text continues

"... Darwin's barberry originates entirely from the adjoining urban environment, being a once popular garden plant..."

We know that Darwin's barberry is now well established outside of private gardens and freely regenerating along tracks and open ground in the OGB from Mt Kaukau south. The reason it is not apparent further north is the lack of opportunity and the natural rate of plant advance for it to be noticeable.

- c) The caption in section 3.2.1 of this OGB Plan on page 17 observes

*"The last half century has seen the landscape transformed by succession from pasture-covered to gorse to regenerating native vegetation. Similar succession **seems** to be starting to happen with Darwin's barberry, as observed at Wright's Hill, **although it takes longer**"*

- d) Only time sequenced images will establish whether Darwin's barberry will in fact be replaced by native vegetation as the text suggests

"While gorse and Darwin's barberry are still prevalent in many areas, and while there are occasional pine plantations and other scattered exotic plant species, secondary native vegetation is gradually emerging as the dominant cover." [3.2.2 Nature Today page 19]

3.2.2 Nature Today

The opening three paragraphs are key statements that capture the change that has occurred in attitude and the effects of large scale pest control and restorative planting. However, how much was Council-led and how much was community-inspired is debatable.

3.3.3 Continuity and Urban Edge

Opportunities

"... it is increasingly a green corridor connecting up nature and offering extensive inter-linked recreational opportunities ..." [3.3.3 para 1]

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- a) It would be helpful to have examples of the 'opportunities' that the OGB's size provides that are not possible or feasible elsewhere in the other open spaces of Wellington.
- b) We agree that seating must be provided at convenient intervals along tracks for both rest and enjoyment. Also shelters in exposed locations that can provide protection from the elements as well as useful information and first aid equipment.

3.5.3 Access and Amenities

Activities

- a) The document has provided a non-exhaustive list of actual and potential activities that could occur on in the OGB. We submit that many of these activities are not dependent on a nature-focused space and are inappropriate where vulnerable ground dwelling wildlife exists.
- b) We contend that the overriding point of an OGB is its value as an ecological corridor this should be clearly stated in the document and not be compromised [3.5.3 para 6 page 30]. The OGB concept was advocated by community groups from the 1960s **for conservation** [3.6.1 para 1].

4.1 Land Administration

4.1.1 Objectives

The three objectives are an appropriate amendment to the 2004 document and we appreciate the emphasis in objective (2) on the creation or maintenance of the vision (eco-corridors), by the use of word "connected". In objective (3) we acknowledge the importance of working with adjacent landowners and taking opportunities to acquire neighbouring land where this becomes available.

4.1.2.1 Reserves classifications, land acquisitions and management mechanisms

"8. Manage the removal of encroachments into the OGB reserves through the process outlined under the Rules section of this Plan: section 5.3.4 ..." [page 35]

We support the inclusion of this rule and the approach detailed in sub-section 5.3.4 on pages 85–86.

Classification

"2. Classify all Outer Green Belt reserves as scenic reserve unless there is particular reason to use an alternative classification ..."

We would like to see the OGB reserves given the higher level of protection afforded by scenic (a) reserve rather than the 'scenic (b) reserve' classification because it places the emphasis on native biodiversity.

We do accept that the obligation to **exterminate all exotic plants as far as possible** is not reasonable for WCC at this time however the Council can use its best endeavours with the assistance of the community to **minimise the presence of exotic plants as an objective of this Plan.**

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Reserves Act 1977

s.19 (1)

'It is hereby declared that the appropriate provisions of this Act shall have effect, in relation to reserves classified as scenic reserves—

- (a) for the purpose of protecting and preserving in perpetuity for their intrinsic worth and for the benefit, enjoyment, and use of the public, suitable areas possessing such qualities of scenic interest, beauty, or natural features or landscape that their protection and preservation are desirable in the public interest:
- (b) for the purpose of providing, in appropriate circumstances, suitable areas which by development and the introduction of flora, whether indigenous or exotic, will become of such scenic interest or beauty that their development, protection, and preservation are desirable in the public interest.'

For Scenic Reserve A ((a) above), s.19(2)(a) states:

'... the indigenous flora and fauna, ecological associations, and natural environment and beauty shall as far as possible be preserved, and for this purpose ... exotic flora and fauna shall as far as possible be exterminated'

For Scenic Reserve B ((b) above), s.19(3)(a) states:

'... the flora and fauna, ecological associations, and natural environment and beauty shall as far as possible be preserved.'

4.1.2.2. Urban containment

Buffer zone

"Ample breadth is needed for people to feel remote from the city when in the Outer Green Belt and for the Outer Green Belt to function as an ecological corridor. This is a unique and valued characteristic of the Outer Green Belt." [page 36]

- a) We concur with this statement however; somewhere in the Plan we would like to see a definition of "ample breadth". We recognise that this may be contingent on a number of factors, but we would like some description of what is considered "ample" in different circumstances.
- b) Refer also to our request for an ecological buffer zone (of ample breadth) between the Urban and Rural communities.

4.2.1 Objectives

"To restore and protect a continuous ecological corridor along the Outer Green Belt, mainly on the city side, that connects areas of high natural value, taking into account opportunities to enhance ecological connections beyond the Outer Green Belt and the need to retain open grassland in specified areas for recreation and landscape reasons ..." [4.2.1 point 2]

Ecological connections and landscape form

- a) We support the objectives in this sub-section, especially objective (2) above, which reiterates the eco-corridor aspect of the Outer Green Belt and the ecological extension beyond the Outer Green Belt.

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- b) We are not convinced for the *need* to retain open grassland for 'recreation'. Natural grassland is a landscape form that exists in patches along the south coast however if there is a natural progression to another landscape (possibly a former one) should we prevent it occurring? An explanation of when it would be necessary and appropriate to 'retain' open grassland would be helpful.

4.2.2.1 Caring for Nature

Pest control

"4. Protect key areas of high ecological value or species through ongoing and concerted pest animal and pest plant control ..." [4.2.2.1 point 4].

We are pleased that pest plants are given equal prominence with pest animals in 4.2.2.1 point 4 and is repeated in action (1) under 4.2.2.3 (page 38), in action (1) under 4.2.2.4 (page 39) and in actions (8) and (10) under 4.2.2.5 (page 41).

Unfortunately, this emphasis does not translate, elsewhere in the Plan, into meaningful action as illustrated in the extracts from page 42 shown below:

"... available resources limit the extent of weed control that can be carried out ..." [4.2.2.5 para. 2, page 42]

"In ... areas such as the ridge-tops of Wrights Hill and Te Wharangi ridge, [Darwin's barberry] is so widespread that control is not feasible at this time ..." [4.2.2.5 para. 3, page 42]

This means that the considerable threat posed by Darwin's barberry (and other weeds) is confirmed but a stated lack of resources means that it will not be dealt with.

Darwin's barberry

- a) We note that the reason the problem is so great as to appear overwhelming is that no action was taken previously, because of a lack of resources, even though 15 years ago the 2004 version of the Outer Green Belt Plan identified Darwin's barberry as a major threat. It stated in that document in sub-section 4.3.2.4 of that document that:

"Darwin's barberry will be monitored and managed vigorously to ensure it does not impede forest restoration or threaten existing vegetation or open spaces"

- b) The longer the threat is ignored the more overwhelming the problem will become. We suspect that, in many cases, Darwin's barberry is not considered a great threat because "in the long run, it will be outgrown and outshaded by native trees".
- c) This, in our view incorrect, opinion, appears to be based on scientific papers published in 2008² and 2012³ that concluded that barberry would not establish under a full canopy in a mixed beech-broadleaf forest. The 2012 study used 2 sites in the central North Island (near Ohakune) and 2 in the south of the South Island (near Tapanui). None of these sites closely resembles Wellington in climate or soil type. Furthermore, the principal Wellington forest cover in the Outer Green Belt is podocarp-broadleaf, as opposed to the beech-broadleaf forest in the study.

² McAlpine, K.G.; Jesson, L.K. 2008: Linking seed dispersal, germination and seedling recruitment in the invasive species *Berberis darwinii*. Plant Ecology 197: pp119-129.

³ McAlpine, K.G.; Wotton, D.M. 2012: Survival rates of Darwin's barberry (*Berberis darwinii*) seedlings in mixed beech-broadleaf forest in New Zealand. DOC Research and Development Series 329.

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- d) Our experience in Wellington goes against the conclusions of the 2012 DoC paper and very closely aligns with the description of Darwin's barberry behaviour on the WeedBusters website and the summary in the Department of Conservation Dirty Dozen information sheet.
- e) Our observations are:
 - i. Darwin's barberry is far more resilient than gorse and it takes a very thick canopy to slow its growth
 - ii. Unlike gorse, Darwin's barberry will grow into the canopy to a height of around 5m, spread laterally and propagate new stands in this fashion. It will smother even fairly mature native trees.
 - iii. When cut back, it re-sprouts quickly. It will survive a poorly cut stump and applied picloram gel and needs repeat visits to suppress seedlings.
 - iv. Our work in Forest & Bird is generally with regenerating bush, which Darwin's barberry easily out-competes, rather than with established forest.
- f) Our experience is mainly anecdotal, although this does not mean it should be ignored or dismissed. However, we would like to see a scientific study carried out to determine whether Darwin's barberry, *in the Wellington region*, is only a temporary problem, as so many people seem to assume.
- g) In our 2018 review of an earlier draft of the Plan, we noted "Darwin's barberry is in DoC's "Dirty Dozen" worst weeds and we question the merits of devoting any resources to a revised Outer Green Belt Plan if Darwin's barberry is to be left unmanaged".

4.3.2.1 Landscape character

Exotic plants

"At the edges of the Outer Green Belt ... [exotic] as well as indigenous species could be planted ... for faster growth and to provide food and habitat for wildlife, provided the species is non-invasive in natural areas eg Eucalyptus species trees..." [4.3.2.1 Explanation para 3, page 45]

- a) We strongly reject this suggestion; it would send an appalling message to landowners adjacent to the OGB. As well as undermining the native character of the Outer Green Belt forest, exotics such as pines and eucalyptus are considerably more fire-prone than natives and can attain a significant height creating two future hazards.
- b) With climate change now an accepted fact and the increasing frequency of drought and other extreme conditions, we should not plant exotics in our native forests — even at the edges.
- c) We have plenty of pioneer species that can withstand weather extremes and are relatively fast growing, they provide good ground cover and food for native fauna — it's what they do.

4.5.2.3 Track network

Dual use tracks

"Manage all tracks in the Outer Green Belt for shared foot and bike-based use unless otherwise specified in the OSAP or in this Plan ..." [4.5.2.3 (3) page 54]

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- a) We are deeply concerned about the default assumption that most tracks will be dual-use for walkers and mountain bikers. Not all bikers are responsible users of shared tracks; there are/will be sufficient numbers of irresponsible bikers to cause walkers, especially those more advanced in years and family groups with young children, to refrain from walking on these tracks. This would be a great shame as they are the people who would benefit greatly from the contact with nature. Forest & Bird walking groups are composed mainly of senior citizens.
- b) A person on foot, whether running or walking, who has once experienced an out-of-control biker coming round a blind corner at speed will be reluctant to use a shared track in future, even if no collision occurs. If the experience is repeated, the individual(s) will understandably become less and less likely to walk on these tracks in future.

"... more than 70% of users on the OGB are usually on foot, engaging in in a wide range of activities (walking, running, trap checking, orienteering etc ... correspondingly the vast majority of track network is available for on foot use ..." [4.5.2.3 Explanation page 56]
- c) We note that WCC believes that 70% of its track users are walkers and more than 20% are bikers. It notes that the proportion of bikers has increased sharply and assumes that this is due to the increasingly popularity of biking. However, the percentage figure would also increase if fewer walkers were using shared tracks because of the fear of meeting a reckless downhill biker.

Conflict

"Elsewhere, new tracks are proposed to meet needs for improved access/loop routes, and in some cases to manage user conflicts ..."

"There has been community concern about the apparent focus in recent years on developing mountain bike tracks. That development has been focussed on providing for a new and still growing recreational activity, which now represents more than 20% of track users. Considerable further development is proposed in the bike-prioritised Makarā Peak Mountain Bike Park (see Part 6, Management Sector 5)..." [4.5.2.3 planning para 3 page 56]

We would like to see user conflicts avoided before they occur through appropriate design and planning in *all* cases, not just "some". There are bike-priority tracks through the Makara Peak Mountain Bike Park and there will be similar facilities in the future Porirua Adventure Park. Everywhere else, we consider there is a very strong case for always separating bikers and walkers, except possibly on major tracks where the tracks are wide and there is good visibility along the track.

Track variety

"... while [the OGB] can accommodate some ... narrow/wide/rough/smooth/steep/graded [tracks] ... not desirable, to have all these options everywhere ... and be cost-effective ..."
[4.5.2.3 planning para 1 page 56]

Having a variety of tracks is part of the enjoyment of being in nature so we would not like to see the more difficult-to-maintain tracks either closed down or not built purely on cost grounds.

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Capacity and control

"... have been building unplanned and unsanctioned tracks ... can lead to proliferation ... user conflict ... environmental damage , ... track building is to be authorised first by Council ..."
[4.5.2.3 planning para 5 page 56]

"At some stage, the limit of desirable track capacity will be reached ..." [4.5.2.3 planning para 4 page 56]

- a) We are surprised that unsanctioned track building on public land has been occurring unchecked whether with good intention or not, and welcome the rather belated requirement for Council to approve new tracks and any modification to existing tracks.
- b) We would like to see rules around the density of the track network within a defined area ie track length/area per hectare. Council has similar rules for their recreational parks. Furthermore we would also like to see a definition or statement of what "desirable track capacity" means.

4.6.2.6 Outer Green Belt Identity

Strategy

"Develop a visual identity for the Outer Green Belt to ensure consistent and appropriate style in site development features eg park furniture and signage that reflects a low-key, natural character ..." [4.6.2.6 Action page 69]

"The Outer Green Belt is a prominent feature in Wellington's landscape yet it is still not as well-known as it might be. Its sheer scale makes it a dominant feature in Wellington's landscape, visible from most parts of the central city and suburbs." [4.6.2.6 Explanation page 69]

"It is arguable that it contributes Wellington's top ranking in the 2018 Deutsche Bank liveable cities survey ..." [4.6.2.6 Explanation para 1 page 69]

"Greater appreciation of what it does for Wellington ... will be important in its protection and management over coming years, in the face of pressures for urban growth." [4.6.2.6 Explanation para 1 page 69]

"The development of a visual identity that can be used in signage, maps and other information will help to raise recognition of and awareness of the whole Outer Green Belt. The visual identity can also be quite subtle, such as guiding the low-key design of site furniture appropriate to the Outer Green Belt's rugged, natural character." [4.6.2.6 Explanation para 2 page 69]

- a) We support the policies listed under this heading and the consequent action. However, the way this action is implemented will have a considerable impact on its success.
- b) We agree with the points made in the explanation and especially the key elements of the strategy as expressed in the extracts above.
- c) Managing the conflict of urban growth pressure on the OGB and getting the aesthetic design of the visual identity right are of crucial importance.

5 Rules of use and development

5.2 Rules – Objectives

"1. Manage activities for the use and development on the Outer Green Belt ..."

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This section calls for the management of activities in a way that recognises and protects key landscape, natural values etc. [5.2 rules - objectives page 76 (a)]. There is no specific mention of biodiversity or wildlife corridors. It would be good for the objectives to be more specific.

Rather than manage “use and development” — which is a means — the objectives should be to:

- a) Protect and preserve the biodiversity of the fauna and flora of Wellington, and
- b) Provide for the enjoyment and recreation of the people of Wellington subject to protection of the key values of the OGB.

5.3 Rules – policies

“Maintain discretion over new activities and utilities to avoid or limit impacts on the environment...”

- a) The policies in this section are fairly permissive without strong statements to give confidence that decisions will protect nature and biodiversity and limit impact. The policies are currently too open for a controlling authority. For example “maintain discretion” [5.3 (3) rules – policies] should be “new activities or utilities **will not impact on ... or have limited impact**”.
- b) Provisions allowing permanent and temporary use of the OGB need to be stronger with clear criteria to guide decision making

5.3.2.4 Leases Licences and concessions [Page 80]

“... sporting activities that require ... use of purpose-built ground surfaces, such as a playing field ...”

- a) The listed activities in this section in many cases are more applicable to parks in the City than the ‘wild eco-corridor’ of the OGB. The wording in clauses 2 and 3 is far too wishy washy. “In general” is not strong enough.
- b) There should be a complete ban on buildings and any other structure unless these are essential for the well-being of the people of Wellington or the management/use of the OGB and cannot be located elsewhere.

5.3.2.9 Public Utilities

“... it cannot be reasonably located elsewhere...” [5.3.2.10 (1) b Public utilities page 82]

It is too easy for reserve land to be seen as a cheaper option to buying land outside reserve areas. The criteria “**cannot be reasonably located elsewhere**” [5.3.2.10 1b] needs to be very specific and state that they **cannot** be located outside the OGB — ie it is not realistically possible to be located elsewhere or there is no alternative solution e.g. power pylon or share a facility.

5.3.4.3 Botanical enhancements [page 86]

We support this provision provide these ‘enhancements’ do not include gardens or anything that would lead to assumed ownership as has happened in the past on Town Belt land — and further that the enhancement is compatible with Wellington’s native biodiversity.

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6.1 Sector 1 Te Ngahere-o-Tawa / Redwood

Plan continuity

- a) The title of this sector has changed and so too has its boundary with Sector 2 which has also had a name change. The current sector boundaries and their names are meaningful because they refer to the names of the prominent ridge lines that make up the Outer Green Belt. The natural geographic boundaries they create provide separation between settlements and gives each a character and 'sense of place' that is unique to that community. This diversity is why Wellington is an attractive place to live.
- b) A great deal of thought went into the structure of the 2004 document and we see no reason for changes in name and boundary. We would like to see a continuity of sector boundaries and names between this Plan and the 2004 document, with Sector 1 as Spicer and Sector 2 as Best's Ridge or alternatively replaced by their Māori names.

Marshall Ridge

"The native forest in Redwood Bush is strategically located to enhance new reserves likely to be created along the Marshall Ridge under the Stebbings Valley structure plan. The new reserves will be 'stepping stones' for birds moving from Redwood Bush, with its seed sources, towards Caribbean Avenue Reserve and Belmont Gully on the other side of the Porirua Stream valley ..." [6.1.1.2 para 1]

"The OGB reserves ... will play an important urban containment role ... and recreational resource for the new urban development.. New road networks could improve access to the OGB reserves ..." [6.1.1.3 para. 3]

"... residential development may extend ... from Churton Park and potentially over Marshall Ridge ... and likely to include a future road connection Redwood [Tawa] and Churton Park ..." [6.1.1.3 para 3]

- a) Marshall Ridge is a prominent feature of the Tawa basin and is currently covered by Forestry and, as in the case of Karori Park's macrocarpas, is providing wildlife habitat. It is one of the few places left and possibly the best to enable ecological connection between the South Coast and Hutt Valley (via the OGB and Belmont Park) as recognised in 6.1.1.2 para 1.
- b) The ridge should be retained along its length as an unbroken green space. Keeping this area covered by plantation or native forest protects the ridge line; maintains wildlife habitat; continues as a 'carbon sink'; and retains the character of Tawa with its strong local support for the surrounding forested hills.
- c) The text proposes a series of 'stepping stones' but is not explicit about what is meant by this term. Our interpretation is that the forested ridge will be reduced to small pockets of recreational space interspersed by housing and roadway (accompanied by pests and domestic cats). We would like more detail about the 'stepping stones' of reserves.
- d) We fail to see how roading and residential housing on this ridge could possibly enhance the existing ecological value and importance of this ridge.

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6.1.1.4 Forest plantations

Spicer Forest / Te Ngahere-o-Tawa

Pine removal

"... it is therefore proposed to progressively remove in stages a significant proportion of the plantation trees and re vegetate the sites with natives ... [6.1.1.4 para 2]

"The objective is to establish a native vegetation canopy over the disturbed sites as quickly as possible ..." [6.1.1.4 para 2]

- a) The understory of the Spicer / Te Ngahere-o-Tawa reserves is well developed and surprising clear of weed infestation. The proposed progressive removal of the pines is at odds with the Council's established policy of letting such trees age naturally and fall over and we feel the reason for not following this approach is weak, the time factor being a minor consideration in the lifetime of the OGB.
- b) We would like to see the transition to a native forest occur naturally as is already happening. We are particularly mindful that disturbing the canopy and providing a light well will invite exotic species not currently present being inadvertently introduced — notably Darwin's barberry and cherry.
- c) Why take that risk and create a problem which currently does not exist? By leaving the trees intact they will continue to provide a carbon sequestration service to mitigate the climatic change. When we look at other sites it is very clear that *"as quickly as possible"* is several decades.

6.1.1.6 Recreation and access

Nature's space

"... local communities have had poor access up onto the ridge ..." [para. 1 page 92]

We appreciate that public access is important and needs to be provided however there are some places along the OGB that should be difficult to access 'nature reserves' where the fauna is left undisturbed. Examples of this can be found where DoC has established sanctuaries on islands and other DoC sites. There is no reason why this should not be the case for the OGB.

Mountain bike tracks

"Porirua City Council announced plans for a \$21m adventure park development in the Rangitui/Colonial Knob area ..." [para. 2 page 92]

- a) The adventure park development mentioned on page 92 in the Rangitui/Colonial Knob DoC scenic reserve includes a mountain bike trail through the old growth Tawa remnant. This was opposed by Forest & Bird and is an example of how recreational interests (in this case commercial) continue to override protection of forest remnant and restoration efforts by use of the idea of 'balance' as the criteria.
- b) In view of the Porirua adventure park development we do not support the provision of additional mountain bike tracks in the vicinity of Kiwi Crescent.

Parking and access

"... a secondary entrance will be developed [in Kiwi Crescent]... which can then provide drive-on access ... suitable for a pleasant picnic area and parking." [para. 2 page 93]

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- a) We endorse the views expressed by FOTB in respect of access and management of the reserves and we oppose the provision of a car park and playground in Ngahere-o-Tawa at the Kiwi Crescent access point as quite inappropriate. We would support an educational nature walk in place of a carpark and picnic / playground. Larson Crescent reserve is close by and could be upgraded with playground equipment.
- b) We suggest that a track access at Westwood road could be a viable option for walking access to Te Araroa Walkway with an existing connection to Colonial Knob Walkway and Spicer Botanical Park. This access point could include parking space

section	action	comment
6.1.2.1	4	Include the Marshall Ridge as integral to the OGB ecological connecting link to Hutt Valley
6.1.2.2	3	Plantation forest clearance not needed and not supported
	6	The time allocated to propagation plants from seeds collected for in-fill planting is unrealistic. We do not agree with the tree removal.
	7	The survey needs to include bats
	8	Not required if plantation extraction is not undertaken
	11(a)	A plan to prevent Darwin's barberry from being introduced into the reserve
	12 (a)	Educate neighbours to remove known invasive and banned plants from their property
	13	Add the words "and remove pest plants from their sections"
	15	Alter to monitor the progress of the indigenous vegetation with the exotic forest trees left <i>in situ</i>
6.1.2.3	1	Amend action to secure the Marshall Ridge along its length between Willowbank road and Brasenose Park. To retain the existing forested area and rezone as a scenic reserve A.
6.1.2.5	5	Refer to comments
	8	We don't believe that a dog exercise area is in keeping with the primary function of the OGB as an ecological corridor containing an abundance of wildlife of which dogs are a serious threat. Dogs also disperse seeds.

6.2 Sector 2: Ohariu Ridge

Potential

"There is huge potential for ecological restoration and catchment protection in this sector ..."
 [6.2.1.3 Nature para 1 page 107]

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We agree that this sector has a “green fields” opportunity to get it ‘right’ with greatest potential to rival the Ōtari-Wilton suburbs in terms of access to and involvement with a nature lush environment.

Ecological links

“There is potential for further restoration in the little gully system ... expanding out from the tiny remnants ...” [6.2.1.3 Nature para 2 page 107]

- a) In general we support the actions proposed to create further links across this sector. In particular, we note that the Upper Stebbings Valley is an area where further environmental progress can be made as development proposals are considered. We note that this area is mentioned in **Actions** — 6.2.2.1(2); 6.2.2.2(1) & (3) & (5); 6.2.2.3(1) & (2); 6.2.2.6(1).
- b) As clearly stated in the draft Plan, this is the sector of the Outer Green Belt that is most “patchy”, with distinct gaps in its continuity. In the light of this, the acquisition of the property at 268 Ōhāriu Valley Road is commendable.

Grassland

“... tops will be kept in grassland, which provides useful habitat for wildlife such as lizards. Grazing is likely to be used to maintain pasture cover in the interim ... while the development options of the 268 Ōhāriu Valley property are being considered ...” [6.2.1.3 Nature para 3 page 107]

We would like to see the grassland currently ‘pasture’ transformed to grassland of native species which will encourage the establishment of an increased diversity of invertebrates attracted by the native flora; this in turn will greatly enhance the habitat for lizards.

Dogs

“Make provision for dog exercise areas when planning the future reserve network in this sector ...” [6.2.2.6 (7) page 111]

In regard to exercise areas for dogs we are assuming that these areas will be on the periphery of the OGB and not an integral part of it because of the danger dogs represent to wildlife.

Upper Stebbings Valley

Our primary concerns are covered in the comments under 6.1 Sector 1 with regard to the Upper Stebbings Valley’s development and its likely impact on the existing Marshall Ridge/ Glenside ecological connection. Our other concerns about this sector are those which we have raised generally in our comments relating to Sections 1–5. We have no other sector-specific concerns to raise.

6.3 Sector 3: Kaukau

6.3.2 Overview

“... this is a long established section of the Outer Green Belt ...”

“... Council is working ... to secure public ownership of land for the Outer Green Belt that will encompass The Crows Nest and connect Huntleigh Park with reserve land on the main ridge and additional reserves ... The areas have significant ecological values associated with remnant native forest ...” [6.3.2.1 Land administration para 2 page 117]

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The additional parcels of land described in this overview is music to our ears. We are delighted with the progress being achieved in their acquisition by Council.

6.3.2.2 Nature

Weeds

"... this sector holds some of the most important forest remnants in the city ..." [page 118]

"... Darwin's barberry is visible in this sector with some large infestations on the upper slopes north and south of Kaukau ..." [page 118]

"Given the extent of the infestation ... biocontrol appears the only viable option ..." [page 118]

We have expressed our views about Darwin's barberry throughout this review and won't add to them in this section except to say bio-control is a management tool used to contain a plant and takes a long time to be effective. Council is gambling that the weevil being trialled will outpace the dispersal of this very hardy and aggressive plant. We don't share that optimism.

Forest & Bird along with similar minded community interests in this sector have taken on the task of public awareness and have initiated a concerted effort by volunteers to tackle this growing problem for Wellington.

6.3.3 Action

6.3.3.5 Recreation

Track network

We acknowledge that tracks are the means of access; however, there can be too many of them which can destroy the 'wild' and remote aspect of being in a forest or on open ground. They are also a perfect avenue for pests, both animal and plant, to travel along.

We would like the Council to publish with this document a comprehensive map of existing and planned tracks across all sectors giving us the big picture for the OGB and know that the Council has an end-point in mind for track building.

6.4 Sector 4: Chartwell/Karori Park

6.4.2.3 Grazing

"... phase out grazing on Te Wharangi ridge and maintain grassland where desired on the tops by alternative means ..." [6.4.2.2 para 2]

"It is expected that ... secondary forest will gradually regenerate over the ridge top an outcome ... weighed against ... improved recreational experience ... that will mean a change in landscape character ... to link native vegetation across the ridge into the North Makarā Stream catchment ..." [6.4.2.2 para 2]

We agree with the strategy.

Viewpoints

"... the Johnston Hill look out, other viewpoints along the Skyline Track ... will need to be kept clear." [page 139]

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- a) We agree with allowing natural re-growth to occur. The beauty of nature is that the only constant is change. Instead of cutting ugly holes to maintain the status quo for "recreational experience" it would be better to work *with* nature and provide viewing platforms. These can be designed and constructed to merge with the vegetation — they are commonplace across New Zealand.
- b) This would be a wonderful way to have a magical tree-top experience. An inventive engineer could design the platform to be extendable and be added to as the forest grows. The stages of platform extension would provide an interesting way to record the growth.

6.4.2.5 Recreation and access

"... it is important to provide for walkers at Karori Park ... and make the main Wahine Track down through the 'wild side' for walkers only ..." [page 140]

This addresses the concern we have about mixing mountain bikes with walkers.

Chartwell Drive / Chartwell Bush entrance

Forest & Bird MoU

"This is the site of Forest & Bird's proposed planting project but the remaining land offers a relatively open flat site —There is potential to provide a pleasant picnic and entry area with tracks to ... Skyline Track ... and Otari-Wilton's Bush ... potential activities ... basic overnight camping ... More parking than the limited capacity currently at the road end would enable this area to be a main entrance ..." [page 140]

- a) Forest & Bird has an MoU with WCC signed in 2015 for a project to convert an already existing wetland to a native wetland habitat for wildlife as one component but not the only one.
- b) The project also includes trapping and is primarily concerned with removing weed species and rubbish with some in-fill planting of species that would have naturally occurred in this location if it had not been modified. Picnic sites and a track to Otari-Wilton's Bush are included in the Plan and so also is provision for a walkway across or around the wetland.
- c) The reference to parking in the text does not make it clear as to location of the parking space. We would like to be assured that it will not be on this reserve land. There is ample parking space at the entrance on Transpower land which WCC has an easement over and also on Chartwell Drive.
- d) We agree the open flat site is a rare commodity in the OGB and point out that a native wetland is also rare and of greater value to the OGB than horse grazing (or parking). The current grazing lease expires in October this year although the text implies that a new lease has been agreed in advance of that date.

section	action	comment	
6.4.2.1		Gazetting of recent acquisitions as reserve need to identify scenic and recreation classes	
6.4.3.1	1	We conclude from the wording that WCC is contemplating using DoC reserve for parking — which if it is the case we will oppose.	

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section	action	comment	
6.4.3.2	7	We assume the action refers to Chartwell Reserve. DoC does not permit the weevil on its reserves, the release is on Council land. We know from the GWRC expert that the weevil in sufficient numbers will slow the spread of Darwin's barberry but will not stop it.	
6.4.3.5	3a)	Forest & Bird wishes to be included in this consultation process	
6.4.3.6	3	WCC to clear abandoned and rotting cars and household effects from Chartwell Reserve (Chartwell Bush)	new

6.5 Sector 5: Makara

A minor note: The macronisation "Makarā" is used through the draft Plan, but there is no support for this form that we have identified in references. A W Reed's *Māori Place Names* (a widely used and respected source) does not include this form. Other sources suggest either "Makara" (no macron) or "Mākara", but "Makara" appears to be the most common form.

As a mountain bike park, the Makara Peak sector appears to have been extremely successful. However, this is not the only success factor that should be recognised — the Makara Peak Supporters Group has worked hard to ensure that one native tree has been planted for every one metre of new track cut. This has led to a richly biodiverse area of new planting which we are told has made the biking experience very different from that in most other bike parks around the world.

Safety and restrictions

"All tracks in the mountain bike park are prioritised for mountain biking use ... meaning that walkers and runners on the shared route tracks are expected to give way to bikers ..." [6.5.2.5 Recreation and access, Walkers and runners in the mountain bike park, para 1 page 161]

"... tracks are further designated for downhill mountain biking use only for safety reasons ..." [same reference as above]

Clearly, our remarks about conflict between walkers and bikers on shared-use tracks apply to this sector in the sense that walking is not encouraged and not permitted in some areas for safety reasons. Bikes have priority on this sector's tracks, unlike all other Wellington reserves.

Skyline Track access

"The master plan ... seeks to encourage other recreational users, including local residents, to use the park ..." [6.5.2.5 para1 page 161]

"At least one through-route — the Skyline Track — should be allocated to shared use and clearly marked as such. While some Skyline Track walkers and runners might prefer to avoid the bike-priority area altogether ... the Skyline Track was conceived as a continuous route along the ridgetops of the Outer Green Belt, so it should traverse Makara Peak and enable walkers to experience and appreciate the park's unique story as well as its regenerating natural values. A suitable route needs to be marked ..." [6.5.2.5 Recreation and access, Walkers and runners in the mountain bike park, para 2 page 161]

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- a) The intention described in Capital Spaces, 1998 that a "...key uniting feature will be the creation of a continuous Skyline Track running from end to end ...". As stated in the Outer Green Belt Plan May 2004 it was a foundation concept. We strongly support the concept of a continuous ridge-top route, which we believe pre-dates the decision to make the Makara Peak sector into a mountain biking area.
- b) We are pleased that the Plan is addressing this Sector's connection to the Skyline Track and support the view that access for walkers to the Skyline Track or using the Skyline Track should not have to do so on tracks with mountain bike priority.
- a) As stated in the quoted extract from section 6.5.2.5, good signage will be key to achieving this. Also, as we have noted earlier, where clear signage is combined with adequate visibility along a sufficiently wide track, conflict between bikers and walkers is much less likely to occur.

6.7 Sector 7: Te Kopahou

"... terrain is potential habitat for reintroducing kiwi under the Capital Kiwi project ..." [6.7.1.2 Nature issues, Capital Kiwi page189]

Te Kopahou is the least developed part of the Outer Green Belt and therefore the one that, in many ways, offers the greatest opportunities. The most significant being the first site to have kiwi not only in the wild but in the OGB. However, there are a number of obstacles to overcome before this and other opportunities may be fully realised:

- i. **Sector size:** The sheer size of the sector, coupled with its ruggedness, makes it tough to manage effectively.
- ii. **Tracks:** There are relatively few tracks, making access more arduous than in other Outer Green Belt sectors.
- iii. **Coastal zone damage:** Public access by motor vehicles is causing considerable damage to the coastal zone along the south coast.
- iv. **Pest control:** Some neighbouring landowners appear reluctant to control pest plants (especially wilding pines) and pest animals (especially goats) such that any effort to control them in the OGB is ineffective along the boundaries with these landowners.
- v. **Landfills:** Parts of the sector are in use as landfills and two of these will continue to operate for the foreseeable future.

Sector size

While the Te Kopahou sector is easily the largest part of the Outer Green Belt at over 1,100ha, its relative difficulty of access has allowed WCC in recent years to start to treat it as a scenic reserve. We are pleased that it intends to formally designate the area as such within the lifetime of the Plan. That said, the lack of tracks and the presence of locked gates make it difficult to manage incursions by vehicles, plants and animals.

Tracks

"The Te Kopahou Reserve is identified as a 'priority biodiversity site' in Our Natural Capital ..." [6.7.1.2 Nature para 1 page 187]

"A number of rare and threatened plant and animal species, and naturally rare or threatened plant species are present ... Some of the rarity and / or threatened status is due to species being naturally uncommon ..." [6.7.1.2 Nature para 1 page 187]

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- a) There are few tracks and most, being former farm tracks, are wide enough for 4WD vehicles. This means that they have adequate sightlines and width to be used as shared walking and bike tracks without too much conflict between the groups.
- b) We ask that when further tracks are cut in this sector, that they are either similarly designed for shared use having good width and sight-lines or when of insufficient width and/or lacking a good site-line they are designated as either walking tracks or bike tracks, but not both.
- c) The lack of easy access has allowed the vegetation in some areas to develop in unexpected ways. As noted in sub-section 6.7.1.2 Nature on p187, this has meant that the sector is highly significant ecologically.
- d) We welcome the actions listed under 6.7.7.2 that, when taken as a whole, address and will greatly improve the protection of the ecology in this sector from risk of further damage by ill-advised changes for recreational, new tracks and other purposes.

Coastal zone damage

- a) We have seen considerable damage being done in the coastal zone as a result of the public road being open 6 days a week. This includes:
 - i. Vehicles being driven at excessive speeds, putting the safety of walkers and bikers in jeopardy and increasing the rate of erosion of the road.
 - ii. Vehicles intentionally leaving the road, putting wildlife at risk and destroying vegetation.
- b) While education is always a preferred option to prohibition, this does not appear to be working and the environment is far too fragile to continue to be put at risk by inconsiderate or incompetent 4WD vehicle owners.
- c) We ask, therefore, that an action be included under 6.7.2.2 to close the road forthwith and that access be strictly limited to bach and land owners and others with a legitimate need to access the area. If this is considered too extreme, we ask that as a minimum the road is closed on Saturdays as well as Sundays.

Pest control

"Introduced weed species such as gorse and Darwin's barberry are also prominent ..." [6.7.1.2 Nature para 2 page 187]

"More resourcing is needed for weed and pest animal control and fencing, taking into account the relative remoteness and difficulty of terrain, which add to costs ..." [6.7.1.2 issues page 189]

- a) Pest invasion from neighbouring properties is a real problem, particularly where landowners do not share WCC's vision of a pest-free reserve. We welcome the new action (14) under section 6.7.2.2 to investigate the feasibility of a fence to exclude feral animals such as goat and pig.
- b) In particular, we note that Darwin's barberry is starting to become a greater pest in this area. Given the history of its spread throughout the rest of the Outer Green Belt, especially the northern sectors, we ask that top priority be given to pest plant (and pest animal) control. We note in particular the statement in the draft Plan on p189 that **"more resourcing is needed for controlling pest animals and plants"**. The emphasis with **bold** type is present in the original bullet point — the typographical

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emphasise indicates the Plan's authors' recognition of its importance. (Such emphasis appears rarely, if at all, elsewhere in the draft Plan.)

- c) We have repeatedly argued and stressed the point that the earlier a problem is tackled, the less it will cost the Council over the long term. The Council has missed the opportunity to control Darwin's barberry and other pest plants in the northern sectors to the point now where it has become so large as to be "overwhelming".
- d) We learn through our mistakes and the "stitch in time" approach is therefore particularly relevant for this southern sector. If Darwin's barberry is permitted to persist unchecked, its removal could be nigh impossible in the future in the harsh conditions and rugged terrain of the south coast. Its removal is urgent in this sector.

Landfills

"North of the Te Kopahou Reserve area, within the landfill designation, are three landfills ..."
[6.7.1.1 Land status, para 2 page 186]

"The C&D landfill designation area ... allows for expansion ... remedial planting that was done under the earlier consent will be covered over ..." [6.7.1.1 Land status para 4 page 186]

*"The [C&D] landfill is very close to the public Tip Track so the higher level and loss of planting will increase its visibility to recreational users. **Adherence to consent conditions and minimising the potential effects on nearby recreational use is important.**"* (our emphasis) [6.7.1.1 Land status para 4 page 186]

- a) The presence of 3 landfills adjacent to or within the sector is noted. A full discussion of these areas is probably outside the scope of this draft Plan, but we welcome Council's commitment to waste volume reduction [6.7.1.1 Land status para 3 page 186] and urge this process be accelerated to reduce waste going to the Southern Landfill.
- b) We do expect the Council to be monitoring the C&D/ Burrells landfill for its compliance to the grant consent conditions and note that Action (2) under 6.7.2.3 Landscape and land use, p195, addresses this matter. The action however is couched as a 'review' to 'ensure' compliance. *We would like to see an additional action to enforce compliance if necessary.*



WCC OUTER GREEN BELT MANAGEMENT PLAN
Submission from Cross Country Vehicle Club

PART A - ABOUT CCVC

The Cross Country Vehicle Club (Wellington) Inc (CCVC), was incorporated 48 years ago and with over 200 members has long been the largest four wheel drive club in New Zealand. The Club prides itself on many years of involvement in public good causes. The Club constitution states that, among other things, the purpose of the Club is to:

- Promote, encourage and conduct four wheel drive trips and events
- Support the retention, development, maintenance and utilization of roads, tracks and places suitable for four wheel drive trips and events
- Act in cooperation with any government department, local authority, club, committee or person for the promotion of the purpose of the Club

CCVC has worked with landowners, Department of Conservation, councils and environmental groups for many years based on these principles. Activities relating to WCC have included track maintenance, conservation and planting work, coastal clean-up (including recovering vehicles and removing wrecks), carrying members of the public on WCC 4WD outings and taking special interest groups into otherwise inaccessible areas.

CCVC has been working with WCC on public good activities for the last 18 years. We have also for a number of years participated in WCC ranger and police initiatives on driver education promoting responsible driving around the South Coast Red Rocks area.

You may be aware that CCVC and WCC signed a MOU in 2018 confirming and cementing our ongoing relationship.

More recently we have assisted in the track clearance and deployment of traps in conjunction with Capital Kiwi in the Te Kopahou block. CCVC will, under a finalized MOA with Capital Kiwi and WCC, monitor and reset these traps for the next two years.

We have also worked extensively with other DoC and various councils, for example the GWRC summer program sunset trips with both "passenger" and "tag-a-long" trips, the Horowhenua District Council and latterly with Upper Hutt City.

The point of this lengthy introduction is to establish the fact that four wheel drive activities can and do contribute positively to communities, when well organised and managed.

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PART B - SUMMARY OF SUBMISSION AREAS

CCVC has detailed submissions covering:

- The Plan as a whole and the need to be consistent with the approved Open Spaces Plan and include managed (i.e. specifically authorized) 4WD¹ activities as a valid recreation use on the OGB. This also includes some comments on Sectors 1 – 7.;
- The South Coast and the Legal Road (which is well used by 4WD's including CCVC) and which CCVC submits should be excluded from the OGB Plan.

CCVC notes that each sector has a number of "communities" listed and whilst these may be useful for future consultation there are also city-wide interests such as CCVC and no doubt others that should also be considered.

CCVC would wish to make an oral submission to WCC on the OGB Plan draft.

PART C - CCVC SUBMISSION

Part C1 - 4WD as a recreational activity

The **Open Spaces Access Plan** approved by WCC in 2016 provides that:

"Existing tracks suitable for motorised recreation can be used on a managed basis by clubs and organisations in accordance with Reserve Management Plans."

The draft OGB plan moves away from this positive position to a much more negative approach in:

Para 4.5.2.2 Para 1*Prohibit or manage through specific approvals....*

Para 5.3.3.1 Para 3 states that specifically prohibited activities include:

- *off-road use of motorised trail bikes or 4 wheel drive vehicles (unless approved for one-off recreational event access)*

¹ The draft uses "off road vehicles" and 4WD vehicles variously. CCVC notes that 4WD vehicles (of which there are many thousand in Wellington) are generally used both on and off road and are accordingly Registered and Warranted, whereas "off-road vehicles" more often refers to specialized vehicles which may be trailered to an off-road location before use. There is likewise a liberal use of "tracks" to indicate both walking, MTB and 4WD capable routes.



The Open Space Plan and the OGB plan should obviously need to be consistent in both wording and emphasis and therefore **CCVC submits that the theme and wording of the Open Space Plan should be incorporated into the OGB Plan.**

To achieve this the following changes are seen as necessary:

Par 4.5.2.2 Para 1 should read:

"Permit existing tracks suitable for motorised recreation to be used on a managed basis by clubs and organisations in accordance with the criteria in 5.3.2, and for access for other vehicles used for servicing, management, emergency and civil defence use."

Para 2 could remain as is.

Para 3 should be deleted and parts rewritten elsewhere. As at present it appears to suggest that a permitted activity under the Rules of 5.3.2 would somehow be subject to further rules from Para 3. CCVC submits that all approval criteria should be in one area in the plan (5.3.2), rather than dispersed as at present.

The bullet point 5.3.3.1. (given above) in the OGB draft should be deleted and replaced with a bullet point in 5.3.1 Para 1 that reflects the Open Space Access plan, preferably with the same wording, being

- *Existing tracks suitable for motorised recreation can be used on a managed basis by clubs and organization (but deleting the reference to Reserve Management Plan as the OGB plan is such a management plan).*

This would limit managed access to existing tracks which were originally formed for vehicles and where occasional use will have minimal impact. Much of the OGB areas now owned by WCC were originally farmed which necessitated suitable 4WD access tracks. These tracks are now used for land management, utilities maintenance² and the like. The impact of occasional 4WD use for recreation has a minimal impact on the land in comparison to other usage. In fact, there are positive impacts such as suppressing growth and keeping the tracks in better condition for all users, especially walkers and emergency services. These are quite apart from assisting in WCCs higher level³ objectives such as Accessibility and Open space Recreation.

In the **Explanation section** (Page 53) a more balanced text would be required such as:

The Outer Green Belt is primarily a recreational environment away from the urban area, where motorised vehicles would normally only occasionally be encountered. Therefore, motorised vehicle access under this plan is limited. Explanation. Moved to later in text.

² "Many of the roads and tracks currently used for recreation were built and/or are maintained by utility companies". Outer Green Belt Management Plan 2004, Page 28

³ Wellington's open spaces, including the coastline, harbour, Town Belt and Outer Green Belt are accessible to all and provide a wide range of recreational opportunities that do not compromise environmental values". WCC Strategic Plan

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Off-road 4WD driving is recognised as a recreational use and local 4WD clubs have run one-off driving events on the Outer Green Belt before, under permits. Provided these events are of a sufficiently small scale, keep to agreed 4WD tracks and are sufficiently infrequent that other recreational users are rarely affected by them, the WCC regards these activities as enabling a particular type of recreational group to access and enjoy the Outer Green Belt environment. Commercial motorised vehicle tours on the Outer Green Belt will not be permitted. Such events could enable some people to access the Outer Green Belt who would otherwise be physically unable to do so e.g. elderly, children, or a 4WD club providing transport to enable a community group to carry out a botanical survey.

[A significant change in this Plan is the proposal to extend the Outer Green Belt to the South Coast, which means the unpaved legal road around the coast from the Te Kopahou Visitors Centre is now part of the Outer Green Belt. Arrange of recreational users, including walkers, those seeking 4WD access much further around the coast, as well as for owners of historic baches (See Part 6, Management Sector 7) on the coast use this road and need to recognise and respect the usage needs of others.] Explanation - CCVC has bracketed the text as it considers the Coast Road should not be included in the OGB Plan, but if WCC decides otherwise the text should be balanced as above.

The criteria in 5.3.3.1 should incorporate Para 3 of 4.5.2.2 as follows:

- a) group size for informal activities (up to 30 people – or 30 vehicles for motorised use) is generally considered allowed, subject to assessment of the impact of what the group is doing)
- b) time of the day and duration of activity (assessed on impact)
- c) location (minimising conflict between park users), and frequency of use of the particular location
- d) day of the week or time of year (restriction in regards to events during public holidays and considering weekday and weekend activity)
- e) the weather (restriction of activities and use of certain areas or facilities)
- f) environment conditions (any impact on the land and surrounding environment) and suitability of existing tracks for vehicle use
- g) compatibility with maintenance or management of Outer Green Belt reserves at certain times.

On a more general basis a typical 4WD use is a “through trip” from an entrance to another entrance, typically over a day or half day, with perhaps a dozen vehicles. Interaction with any other use is limited to the common time in any area which could range from 5 minutes to 15 minutes as a 4WD group passes through. Travel is at relatively slow speeds (less than 10 km/hr) and is well able to pause to allow others to pass. Typically the first vehicle will advise the other group or user that there is say 10 other vehicles following, and will also advise the other vehicles by radio communication of the presence of the other user. Virtually without exception, the interaction does not have an adverse effect on others (judged by on site discussions).

A medium term possibility is contiguous 4WD access along much of OGB ridgelines. From Spicers, through Kaukau to Karori, Makara Hill, Wright Hill and outside Zealandia to Te Kopahou. The few areas without WCC Land or formed tracks can be linked by public roads. Parts of this, are a real possibility now for a CCVC managed “tag-a-long” or “passenger” type trip which could form part of the Summer City activities.



WCC is also moving to afford priority to particular user groups in various areas. Examples are Makara Peak (MTB) and Spicer Forest (horse riding). This tends to give expectations to those groups that other users such as 4WD use is not welcome and the Plan should reinforce the non-exclusivity of such special areas. CCVC considers that within the large 3,000 hectares (and more to come) of the OGB, stretching over 29 km, it should be possible to provide a small area for 4WD managed activities such as driver training, and learning about vehicle capabilities. CCVC runs regular training days for new members and would welcome the opportunity to identify such an area. **It therefore submits that a new Action should be included** along the lines of “work with interest groups to identify an area suitable for managed 4WD activities such as training etc”.

If the maps are to be retained in the Plan, CCVC submits that they should be complete and include all existing formed and farm tracks that are potentially utilisable for 4WD access.

Comments on Sectors

Sector 1 Spicer

There is an effective 4WD track along the length of the Airstrip Block which should be recognized in planning.

The gap at the northern end of the Airstrip block to join the Spicer block (about 50 metres) is on private land which is a part of the Stebbings Valley land. WCC should prioritise an agreement with the landowner (Stebbing's Farmlands?) to obtain a future ridgeline portion to facilitate the early construction of effective public access, including 4WD access. Actual subdivision could await the provision of the land as a reserves contribution or similar.

Sector 2 Ohariu

CCVC welcomes the purchase of 268 Ohariu Rd and notes that it provides a (little used) route for access by 4WD to the 280 m high point.

It is difficult to see why Transpower would not be willing to sell their parcel to WCC provided their access and future utility was assured. This is seen as preferable to the proposed action in 6.2.2.6 Para 3 which should be broadened to include potential purchase as well as public access easements.

Sector 3 Kaukau

The text on Old Coach Road does not recognize that it remains a Primary use as a legal road and that the Secondary use is as a Historic Reserve.

Sector 4 Chartwell

In Para 6.2.4.5 the text talks of a paper road whereas it is in fact fully formed by cuttings and is readily drive-able. In reality it is a farm track situated exactly on a legal road. It was presumably gazetted to give access to blocks below the Otari Trig. Planted trees mark a likely location for a dwelling. Whilst the acquisition of easements above Parkvale

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Rd/Montgomery is desirable, the ultimate goal must be the purchase of suitable property. Completion /clearance of the 4WD route along this ridge is seen as important to provide continuity and access to other walking/MTB tracks.

Sector 5 Makara Peak

CCVC is not normally supportive of Stopping Legal Roads as proposed in Para 6.5.3.1 Para 2. If the Stopping is to be pursued then CCVC submits alternative managed access should be available by either or both of the formed 4WD tracks to the summit.

Sector 6 Wright Hill

CCVC notes there is a significant area between Wright Hill and South Karori Rd which is untracked and relatively inaccessible. It is suggested a medium-term project could be to create an access track, from say the Parade Ground generally along the land boundary down to South Karori Rd. As well as allowing land management access it would give 4WD access between the poorly linked parts of the OGB obviating the need for walkers to share MTB tracks, and possibly lead to other offshoot tracks for MTB use.

Sector 7 Te Kopahou

It is noted that it is proposed to classify the majority of the Te Kopahou Block as Scenic Reserve. CCVC questions why this is necessary as its future is already controlled through WCC land ownership and any objectives are easily achieved as landowner. This situation has seemingly been satisfactory for several decades.

CCVC recognizes that access to large parts of Te Kopahou are in fact through part of Long Gully, specifically the unsealed road from Hawkins Hill to Te Kopahou trig. CCVC is aware that provision of public access along this ridge roadway was a part of the application for Resource Consent when Long Gully was subdivided, but access now appears impeded by gates and notices prohibiting access. CCVC submits that public access should be clearly available.

Part C2 - The Couth Coast and Legal Road

CCVC is confused by the OGB Plan concerning the coastal road. The Plan deliberately narrows the scope from 2004 and the scope is stated as being:

The scope of this Plan is confined to only the land along those ridges that WCC either owns or manages on behalf of another agency, such as the Department of Conservation.

But it then identifies the "Coastal Road" as being a part of the proposed OGB (excluded in 2004 but now being potentially "transferred" from the SCMP). It is obvious that on WCC's own statement, the Coastal Road, being a legally gazetted road, should be out of scope of the Plan.



CCVC notes that the scope of the “Coastal Road” in the OGB draft is also unclear. Presumably it intends to include the Legal and practical road where it is adjacent to/on WCC lands, but it is unclear what authority is sought or presumed over the sections beyond Sinclair Head that are adjacent to privately owned land.

The coastal road until just after Sinclair Head provides access to the area well beyond WCC landholdings (which is still legal road). It is certainly not reasonable to limit use or access in this initial area when it limits access to a much greater area of coast via the contiguous legal road.

It is also ambiguous as to whether “Access Permits” are necessary to be able to utilise the coastal road/legal road, although this is implied by the wording in Para 4.5.2.2 (page 53) and the following explanation. CCVC does not agree that permits should be required, and seeks the wording to be made clear.

CCVC notes that the legal /practical road along the South Coast is significantly different to much if not all of the Outer Green Belt because:

- It has severely limited practical access to and from other parts of the OGB;
- It does not contribute to the OGB purpose of delineation between urban and rural areas;
- It has distinctly different topography, vegetation, and usage;
- It is used by significantly different and wider interest groups;
- It does not fit within the WCC determined scope of the OGB, being neither a ridgeline or land along a ridgeline
- It has a long history of being open and accessible for public recreation
- It is unclear how a Legal Road could be managed in a Plan such as the OGB Plan.

Further the Coastal Area and Te Kopahou was not included in the OGB Management Plan process of 2004 and there is an extant South Coast Management Plan which has covers the area.

As such CCVC submits that further consideration of this **coastal area and particularly the legal/practical road should not be considered** within the OGB management plan. The present provisions are considered more than adequate. If it ain't broke don't fix it.

However, CCVC also wishes to submit to the specific proposals concerning the coast/legal road to demonstrate that some actions proposed are unnecessary and undesirable.

The OGB draft notes that:

“In places the actual legal road area lies over steep cliffs and rock outcrops, and much of the route is subject to constant tidal erosion. ...

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This suggests access is difficult and uncertain, but it could equally well say: “The coastal route, whilst difficult in some areas, is used by several dozen 4WD vehicles each weekend, generally without incident.”

There is certainly one area of steep rock (at Sinclair head) but otherwise the practical road is generally within the legal road as shown on WAMS. In one area the legal road is closer to the cliff than the practical road, but WCC has discouraged use of the legal route to protect the vegetation closer to the cliffs (a position CCVC supports). Minor parts are periodically subject to natural tidal induced changes, not “much of the route” as stated.

The point surely is that the decisions of WCC should not be influenced by statements which give a misleading perspective of the actual position. If you wish, CCVC is happy to give Councillors a “look – see”.

The “issues” raised in the OGB draft are:

Issues include: incompatibility between walkers, mountain bikers and drivers of motorised vehicles including motorbikes; vehicles unsuited to the unformed surface getting stuck; dumping of abandoned vehicles; vehicle damage to vulnerable coastal ecology and disturbance of wildlife; effects of coastal erosion; and risk of rock fall from the unstable faces of the former Ōwhiro Quarry.

CCVC submits:

- A) On incompatibility, CCVC notes that walkers and MTB users are able to enjoy exclusive use on Sundays. Users on other days should expect to meet other modes of transport. On such other days there is no real conflict if all users act in a sensible manner (reasonable speeds, managing small children, stepping off the road to allow vehicles, which travel at perhaps 10 km/hr, to pass, etc) which are little different to the actions expected in an urban environment. In any event any conflict management should not further penalise one group over another. Burden sharing is appropriate!

CCVC does recognize that some walkers do not welcome motorised use, and sometimes express that view. However, walkers and MTB users naturally tend to use the formed track created by 4WD usage. As such all users need to respect others.

There can be incompatibility from irresponsible motorbike use, who operate at excessive speeds (30 to maybe 50 km/hr on sections). Many of these are not Registered/warranted. Education, monitoring and Police/WCC enforcement are seen as appropriate.

- B) Vehicles (suitable or unsuitable) becoming stuck in soft sand or similar is simply a matter of the (in) competence of the drivers, but most vehicles are assisted as



necessary by other users. It is not clear why the incompetence of some minority of drivers should be considered a major public issue warranting intervention by WCC.

- C) Some vehicles are abandoned (perhaps one every year or two) and in due course removed (by the owner or by CCVC in conjunction with WCC). Abandoned vehicles are of course an issue for WCC on the cities formed road and the frequency of abandonment is likely no worse on the Coast Road than elsewhere in the City.
- D) CCVC accepts that some motorized users can cause damage to the ecology if they venture from the practical road. CCVC has been actively working with WCC to replant dunes and foster physical barriers in key areas. Education in terms of signage and monitoring, along with enforcement action as appropriate by WCC, is seen as the best solution.
- E) It should be readily possible to operate a periodic Police/WCC checkpoint to ensure vehicles and motorbikes meet the registration/warrant requirements on the legal road (Quite a common process on the formed urban roads!)
- F) Disturbance of wildlife (seals for example) is not solely caused by vehicles, but often by persons on foot approaching too close. Seals bask on rocks and near water and not on the 4WD track. A restriction on 4WD access may reduce the number of people in the area but is not a solution.
- G) There is undoubtedly some coastal erosion, but it is difficult to see how this can be largely attributed to motorised use. There is also ongoing replenishment of material from both tidal action and the cliffs.
- H) Rockfall risks in earthquakes are unquantified but of course are greater to those who take a longer time to traverse any particular area. This suggests unprotected walkers are at greater risk than somewhat protected motorised users. It maybe that the greatest rockfall risk is from loose material that WCC placed on the harder benches when the quarry closed! In any event the relevance of the issue in the OGB plan is not clear and does not seem to support restricting one group of users (or any users).

Therefore, CCVC does not support 6.7.2.5 Proposals 5, 6, and 7. It does however support increased education, and monitoring noted in Proposal 5, which could be extended to include Registration and Warrant provisions.

Please note that CCVC wish to support this submission with an oral presentation if that opportunity is available.

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Neil Blackie
President
Cross Country Vehicle Club
25 March 2019

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VEHICLE CLUB
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Draft Outer Green Belt Management Plan 2019

Submission

Name: Pamela Olver

Postal address: [REDACTED] Newtown, 6242
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I would like to make an oral submission
phone : [REDACTED]

General comments:

We appreciate the opportunity to submit our thoughts, particularly in relation to sector 7 (and to a lesser extent sector 6) being the areas that are of high priority to us. Over all we are supportive of the council's vision for the outer green belt and wish to comment on a few areas with specific relevance to ourselves and the area where we live.

We note particularly the 5 Guiding principles and how they centre around the 'naturalness' of the environment, with that being the foundation of the Outer Green Belt. It speaks to 'retaining the natural character', 'being able to escape to wild places', and 'landscape diversity' with a consistent focus on protection and management of key values.

A specific concern is the lack of explicit and transparent information about future plans for commercial partnerships with private businesses anywhere within the outer green belt. Where these are planned for, they need to explicitly fit in with the value statements that are at the centre of this plan. The council needs to take care that it is not blinkered by dollar signs when considering commercial adventure tourism in the green belt: that any proposed activities are not detrimental to the green belt ecology, the natural landscape, the neighbours and any nearby residents. Proposed activities should not conflict with the Council's own mission, values and guiding principles.

Our home is on rural land in sector 7. Our rural amenity is protected by the district plan with which we had to comply in respect of all its rules. The rules complement the vision of the Outer Green Belt Plan. Our property is a 'halo property' for Zealandia and widens the very narrow ecological strip between sectors 6 and 7 and the Te Kopahou ridgeline. We have allowed the council unhindered and unconditional access to our property for pest and weed control and have engaged with biosecurity agencies in for the additional protection of the area. Our expectation is that the council will uphold its vision and values in the proposed plan. We expect the council to act as a good neighbor and act tightly in accordance with the District Plan. We expect therefore that the council will not pursue non-complying commercial activities and partnerships that will interfere with our enjoyment of the natural landscape and rural amenity. The council has wisely established a 200m buffer zone around the perimeter of the landfill designated area. This is to protect surrounding properties from the effects of the landfill activities by establishing an ecological barrier. Part of this runs along our boundary. Our expectation is that council will respect this as stated in its plan (and previous resource consent applications). We expect that the council will keep all non-complying activities outside of this buffer zone. Partnerships with neighbours are a bilateral process of respect and communication. These partnerships are also a vital component of the OGBM plan being proposed.

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Relevant clauses for specific additional comments.

1.1.2 PURPOSE

This Outer Green Belt Management Plan ('OGBMP' or 'Plan') has three main purposes:

- to provide a consistent policy, management and decision-making framework for the Wellington City Council's Outer Green Belt reserves;
- to promote shared recognition of the Outer Green Belt's importance to Wellington;
- to promote co-operation between the Council, neighbours, stakeholders and the community in regard to managing the Outer Green Belt.

Our experience suggests that the council has a lot of work to do: it seems to prioritise its own ambitions ahead of fair consultation with existing neighbours and stakeholders in our sector. Properties abutting the OGB are significant stakeholders in discussions and the council should work much harder to protect existing rights of these properties when considering non complying activities in the OGB.

1.1.6 WHERE DOES THIS PLAN FIT IN THE COUNCIL'S WORK?

It also provides for working in partnership with neighbours and communities towards the Outer Green Belt vision.

As boundary neighbours, we value working in partnership with the council to achieve its OGB vision. It is important to us that this is a two-way process. Our property is relevant to the vision for Predator Free Wellington and the Te Araroa Trail, both of which we support.

For reference, our property lies along the southern boundary of Zealandia, bridging between Long Gully and Hawkins Hill road (between sector 6 and sector 7)

(Lot 2 DP 499902)

3.5.1 WHAT DO PEOPLE DO ON THE OUTER GREEN BELT?

I would remove drone flying from the list of recreational activities - it is becoming more common and is likely to have regulation in the future. Drones in the hands of ignorant and inexperienced users are dangerous and annoying.

Looking at the word art and the most frequent words used, it is clear that the natural features of the area are highly valued. Intrusion into OGB by activities that don't uphold the most desired values should be discouraged. Those would be activities that interfere with the natural landscape and unspoiled green areas, that increase traffic or noise in quiet areas and activities that are not freely accessible for all Wellingtonians to enjoy their city. The council should be wary of commercial partnerships that purport to enhance these green spaces, but which are being considered because they can generate revenue for the council rather than because they primarily enhance the natural landscape or quiet recreational use of the areas. New activities should not have a negative effect on neighbouring properties' enjoyment of these green spaces.



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the detriment of neighbouring landowners with whom ongoing relationships are essential to achieve the council's long term vision. Some proposed activities clearly do not fit the intention to restrict development of buildings and structures.

4.5.2 POLICIES

Informal activities that require little infrastructure other than tracks and are based primarily on experiencing the relatively undeveloped landscape are considered the most appropriate. Simply enabling access to open spaces close to nature can be enough and, so, buildings and structures away from entrances will be rare. Suburban reserves and other types of open space sit adjacent to the Outer Green Belt and provide for other recreational experiences such as playgrounds, neighbourhood parks, sports grounds and cemetery space.

Activities such as the proposed zip line do not align with these policy guidelines: The proposal involves 8 huge towers at a minimum of 4m height and 8 platforms from 20 - 40 m2 (excluding site excavations) and multiple lengthy cables. An activity such as the proposed zip line is more in keeping with a playground activity than a quiet recreational activity. The applicants have called the zip line an 'adventure tourism' activity. It is not an ecotourism proposal.

4.5.2.3 Track network

We support the development of a track network suitable for all users and all skill levels as proposed in the plan. We support the Brooklyn Trail Builder's submission generally (apart from its support for the zipline).

4.5.2.5 Dog walking

The council must do more to enforce the 'dogs on leash' policy on the tracks in OGB. Off leash dogs are a menace to our wildlife and also a risk to track users.

4.6.2.3 Partnership with neighbours

For us this is a critical component of the plan. As residents directly affected by the proposed zip line, we currently feel ignored. From our perspective there has been no tangible consultation nor assessment of effects from our property. The council seems hellbent on pushing this proposal through despite the applicant distorting the facts and the council failing to validate consultation claims and reports despite being repeatedly alerted to grossly misleading information. Partnership is a two-way process. We expect the council to apply the 'good neighbour principle' to themselves in the same way they would like it to apply to its neighbours.

5.3.2.12 Commercial Activities

1. Any approval to carry out a commercial activity on the Outer Green Belt will only be permitted if:

- a) the activity is necessary to enable the public to obtain the benefit and enjoyment of the Outer Green Belt or a reserve area within it, or
- b) the activity is for the convenience of people using the Outer Green Belt or a reserve area within it, or
- c) the activity does not adversely affect and benefits the OGB environment e.g. bee keeping.

2. Any approval to carry out a commercial activity that requires a new permanent building or structure will only be permitted if the approvals and consents necessary for the building or structure are considered as part of the application for the commercial activity and the entire proposal is notified publicly.

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3. Any commercial activity in a new or existing building must be complementary and ancillary to a community or recreational activity on the Outer Green Belt

The council must follow its own statements as above and publicly notify the zip line application as it is a non-complying activity.

6 MANAGEMENT SECTORS

My comments will be confined to sectors 6 and 7.

6.6 SECTOR 6: WRIGHTS HILL / ZEALANDIA

Currently the track linking Wrights Hill and Te Kopahou is confined to a narrow strip along the Zealandia boundary fence. Across this saddle the track is extremely steep and unsuitable for most users. Our property may offer alternative options for a track with an easier gradient. We would be open to discussing possibilities for this.

6.7 SECTOR 7: TE KOPAHOU

It should be noted that the area beyond the wind turbine is a specific community of interest. Although postcode is Brooklyn, this is a specific community on rural zoned land and with specific rights and interests in Te Kopahou. Many of the properties share boundaries with the outer green belt. We would like this to specifically noted as a community of special interest in Sector 7.

6.7.1 Masterplan

Our property boundaries are along the link between Te Kopahou and Zealandia and along the main ridgeline above Carey's gully. This creates a wonderful opportunity to partner with the council as 'good neighbours'

6.7.1.1 Land status

As much as possible of the upper slopes will be left undisturbed and decisions about further reserve classifications, including the ridge top where Hawkins Hill Road runs, and the zip line is proposed, will then follow, taking account of the desirability of protecting an ecological link along the ridge top between Te Kopahou and Zealandia.

It is premature and presumptuous to be including the zip line in this document as it has not yet gone through the Resource consent process. This suggests the council has already pre-determined the outcome and is disregarding due process. It would be more transparent to use the words 'activities with commercial partnerships between private operators and WCC' so that it is clear that it is not a council project and that the council endorses commercial partnerships in protected spaces.

In relation to the Southern landfill: there is a 200m buffer strip on the plan that is there as a protective barrier to the activities of the landfill for all surrounding land and properties. It is also an ecological strip to widen the green belt along Te Kopahou ridge. It is our expectation that WCC will not permit any non-complying activities within this buffer zone should it wish to consider itself a good neighbour. Ongoing relationships (such pest and weed control and access to our property) are dependent on the council's own engagement as a good neighbour. We value the need for an ecological pathway through the narrow link along the ridge line.

6.7.1.5 Recreation and access

Hawkins Hill Road. This is an entrance to the Outer Green Belt and provides drive-on public access up to the Brooklyn wind turbine, a popular sightseeing spot, as well as walking and biking access

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south along the ridge to Hawkins Hill and beyond. The road is closed to public vehicle traffic at night by a gate at Ashton Fitchett Drive. There is also right-of-way access along the road to private properties on the ridge and in Long Gully, which has seen increased use of the road in recent years and the need for long-term maintenance agreements. Careful management is needed to ensure safety for recreational users; options include measures to reduce vehicle speed and defining a separate path for walkers and bikers.

We value the enjoyment of this area for everyone. However, for those of us living on Hawkins Hill Rd and beyond, this road is our only access. It is legally an access way not a road. It is our driveway. Legal Right of Way for landowners must take precedence over any other use of the road. The major problem is not speed. The road is not fit for purpose as a combined use road for cyclists, walkers, runners and vehicles concurrently. The council has an obligation to the public (whom are given permission by WCC to use the right of way) to ensure that the access is safe for them. It is not the residents' responsibility to upgrade the access way for public benefit - that lies with the council which owns the road and that permits public access. The council should not be encouraging increased access way use by the public when the access way has been determined (in a council commissioned report) to be unsafe. The council should not be permitting or consenting activities that increase use of the access way until such time as it is of a standard to accommodate such use. Activities such as the zip line will add significant traffic usage to an already failing road.

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WCC Outer Green Belt Management Plan – Capital Kiwi submission

Capital Kiwi is a landscape scale community conservation project aiming to create and sustain a population of wild kiwi in the hill country west of Wellington and south of Porirua. Foundational funding has come from Predator Free 2050 Ltd and Wellington Community Trust. A partnership MOU has been signed with Predator Free Wellington (WCC, GWRC and NEXT Foundation) and partnerships have been forged with iwi, landowners, Wellington City Council, Greater Wellington Regional Council, Department of Conservation, Kiwis for Kiwi, Meridian, and Goodnature.

The project area is 23,000ha from Porirua southwards to Red Rocks. The core project area is an 11,000ha area that is effectively the southwest corner of the North Island. This comprises Terawhiti Station, Kinnoull Station, Makara Farm, Meridian West Wind, and WCC reserves Te Kopahou and Makara Peak. The focus of Capital Kiwi's 4,400 traps is to remove the threat of stoats; this is the pivotal action required to enable a sustainable population of wild kiwi. Stoats are responsible for c. 2/3 of kiwi chick predation. When kiwi reach an adult fighting weight of 1kg it can fight off stoats, possums and rats. The main animal threats to adult kiwi are ferrets (not present in the Wellington region) and uncontrolled dogs.

In the vast bulk of the core project area dogs are either excluded, or the only dogs present are working dogs (who will be put through aversion training); we consider the risk to be relatively minor. After three years of sustained stoat control we will be looking at reintroducing kiwi (2020-2021).

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Ultimately the goal is to have kiwi living alongside people in areas of the Outer Green Belt, with residents from Karori to Mt Kaukau going to sleep at night hearing kiwi. We expect to reach this point in 4-5 years. For more details see www.capitalkiwi.co.nz.

Capital Kiwi and the Outer Green Belt (OGB)

While the bulk of the Capital Kiwi project area is private land where key risks are mitigated and base kiwi populations will be established, the higher profile areas where people and kiwi will intersect will be public reserves. There are some OGB areas where there will be a conflict with existing behaviours of some people. This could potentially be 2-3 years away, but we will need to begin planning for that now.

Capital Kiwi is seeking to establish a strategic context, and partnership, for achieving behaviours that will enable kiwi, people and pets to live alongside each other in the Outer Green Belt (OGB).

We have inspiring references where intersections between people, pets and kiwi are being successfully managed e.g. Whakatane/Ohope, where a kiwi population has grown from 8 birds to 300 in a decade and kiwi are regulars in backyards; Oban on Rakiura-Stewart Island where kiwi are seen on the rugby field and golf course; and over the harbour in Remutaka Forest Park, where a population has grown from a dozen re-introduced kiwi to 150 birds, and residents of Sunny Grove in Wainuiomata hear kiwi at night. Where key threats are managed and the community is on-board

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as kaitiaki, Kiwis and kiwi can live together. We look forward to working closely with WCC to replicate those successes in Wellington reserves.

- We request that the geographical references in the draft plan that specifically mention Capital Kiwi are broadened from Te Kopahou* to include the entire OGB. (*While acknowledging that Te Kopahou holds particular promise as a publicly accessible kiwi zone: with little present conflict of interest and ideal habitat, the uniquely rugged 500ha South Coast wilderness area is well placed to have a context established where people and native biodiversity can co-exist.)
- A key concept expressed in the plan is the value of the OGB as an ecological corridor, facilitating the spread of native wildlife throughout the city. Capital Kiwi will be a salient regional contributor to this vision through its landscape-scale control of mustelids and other predators. The OGB will also be key in the realisation of Predator Free Wellington ambitions.
- Dogs are required to be on a leash in the OGB except in designated dog exercise areas. The plan notes, however, that people frequently let their dogs loose on the OGB. We believe that the existing by-laws are sufficient in principle, but that for ecological corridor goals, as well as PFW and Capital Kiwi ambitions to be realised, behaviour shifts will be required. This will require a multi-pronged campaign encouraging considerate pet ownership. Such a campaign will target a range of motivations. It will involve positive community-led leadership, and will communicate the

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benefits of controlled dogs for owners, dogs, and other OGB users, as well as for vulnerable native wildlife. (For a small minority of dog owners, it will mean increased by-law enforcement.) We'd look to work together with key stakeholders (e.g. rangers, dog walking and pet care businesses, local vets, SPCA, Zealandia, Makara Peak), and to replicate the inclusive 'Take the Lead' kaupapa used in Polhill Reserve, to achieve shifts in dogs on leads. We love dogs, many of our team are passionate dog owners, and we expect Wellingtonians to embrace the minor behaviour change in return for living alongside kiwi.

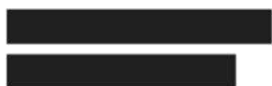
This will mean increased investment to what is currently going into this aspect of managing the OGB. Capital Kiwi will be able to contribute some resource. We expect that WCC and other partners will do likewise to achieve these shared goals.

Other kiwi projects have established dog community liaison roles and such a role has been recommended (with face-to-face local engagement identified as key to effectiveness); other investment would include subsidised/free aversion training. Capital Kiwi welcomes kōrero around partnership in this space.

Please contact us with any questions. Ngā mihi, go kiwi!

Paul Ward

Project Lead, Capital Kiwi



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First Name:	Last Name: *
<input type="text" value="Russell"/>	<input type="text" value="Pierce"/>
Organisation:	
<input type="text" value="Otari Farm Partnership"/>	
On behalf of:	
<input type="text"/>	
Postal Address:	
<input type="text" value="REDACTED"/>	
Suburb:	
<input type="text" value="Karori"/>	
City:	
<input type="text" value="Wellington"/>	
Country:	
<input type="text" value="New Zealand"/>	
PostCode:	
<input type="text" value="6012"/>	
eMail: *	
<input type="text" value="REDACTED"/>	
Preferred method of contact	
<input checked="" type="radio"/> Email	<input type="radio"/> Postal
Daytime Phone:	
<input type="text"/>	
Mobile:	
<input type="text"/>	
Would you like to present your submission in person at a hearing?	
<input checked="" type="radio"/> Yes	
<input type="radio"/> I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.	
Additional requirements for hearing:	
<div>That the Corporation of the City pays for its acquisitions in the same way as every other Corporation has to. That is with the guiding principle of willing seller willing buyer.</div>	

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1. Do you agree that the Vision statement on the front of the [Summary Document](#) or in [Part 2 of the draft plan \(starts page 12\)](#) captures what is special about the Outer Green Belt Reserves?

- ☐ Yes
☒ No
☐ Don't know

If not, why not?

Claiming other peoples assets without negotiation.

2. Looking at the [Summary Document](#) section 'What is the Outer Green Belt?' or at [Part 2.3 \(starts page 13\)](#) and [Part 3 \(starts page 16\)](#) of the draft plan, do you agree with:

	Yes	No	Don't know
The Guiding Principles	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The Key Values	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3. Looking at the plan highlights in the [Summary Document](#), do you think these will help achieve the Vision that *the Outer Green Belt...*

	Yes	No	Don't know
is Wellington's wild green connector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
visibly defines the edge of the city	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
protects and connects nature	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
invites people to escape and explore	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Why/why not?

Because of an active policy of expropriation by proclamation.

4. Looking at [Parts 3.6 \(starts page 30\)](#), [3.7 \(starts page 31\)](#) and [4.6 \(starts page 65\)](#) of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

- ☐ Yes
☒ No
☐ Don't know

What do you think could be added?

Live up to the rhetoric.

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5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years (refer to part 4.5 of the draft plan - starts page 52). Do you agree that this should be the main priority?

- ☐ Yes
☒ No
☐ Don't know

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again (refer to Part 4.5.2.3 - starts page 54). [Click here for maps showing the proposed track networks.](#)

6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

	Yes	No	Don't know
Sector 1	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sector 2	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sector 3	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sector 4	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sector 5	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sector 6	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sector 7	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

Do it by paying for it.

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan that would allow for greater accessibility to the Outer Green Belt by a wide range of people.

Is there anything missing that would help?

Consultation with landowners.

The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less

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- Areas of regenerating native bush won't get damaged

Cons

- Areas won't look as rural
- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other means to maintain the existing character and views
- People won't be able to see farm animals

8. Do you support the draft plan proposal to phase out grazing animals?

- ☐ Yes
☐ No
☐ Don't know

Why/why not? What ideas do you have to balance out the pros and cons?

9. The draft plan proposes that that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones ([refer to the map of the entrances on page 60 of the draft plan](#)). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

	Yes	No	Don't know
Do you support this proposal?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you think it will encourage more people to use the Outer Green Belt reserves?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please rank the proposed new entrances in order you think we should complete them. The new entrances are planned for the Brooklyn wind turbine; Wrights Hill; Chartwell Bush/woolshed; 268 Ohariu Valley Road or McLintock Street; and Ohariu Valley Road or Upper Stebbings Valley.

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

- ☐ Yes
☐ No
☐ Don't know

Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also considering the management of all of the areas as a connected whole.

The Summary Document lists the key actions for each sector (shown on the Map Page), sector descriptions.

11. [Sector 1 \(Te Ngahere-o-Tawa/Redwood\)](#) is the northernmost part of the Outer Green Belt, extending from the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

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Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

12. **Sector 2 (Ohariu Ridge)** runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

13. **Sector 3 (Kaukau)** extends from Old Coach Road above Johnsonville to the Chartwell Spur above Crofton Downs. It is also the backdrop to Broadmeadows, Khandallah and Ngaio.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

14. **Sector 4 (Chartwell/Karori Park)** extends from Chartwell Spur above Crofton Downs through to the Makara Road along Te Wharangi ridge via the Kilmister Tops and Johnston Hill above Karori.

Yes No Don't know

☐ ☐ ☐

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Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

15. Sector 5 is Makara Peak. This sector includes the mountain bike park.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

16. Sector 6 (Wrights Hill/Zealandia) extends from South Karori Road, across Wrights Hill and the valley of Zealandia.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

17. Sector 7 (Te Kopahou) extends from Zealandia along the main ridgeline, taking in the Brooklyn wind turbine, Hawkins Hill and Te Kopahou before descending all the way down to the South Coast.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

18. Do you have any comments on the [proposed reserve classifications in the draft plan](#)? Please provide the name and/or legal description of the reserve and your comments.

19. Please add here any other comments or suggestions you have in regard to the Outer Green Belt Management Plan.

Attached Documents

File
Outer Green Belt Management Plan 2019

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Shona McCahon

From: Richard Mann [REDACTED]
Sent: Monday, 25 March 2019 9:47 PM
To: Shona McCahon
Cc: Bec Ramsay
Subject: Karori Proposed Bike Trails

These trails are well used by walkers everyday of the year, on a daily basis.
 All these trails are used.

Johnstons Hill is not under-utilised.

The BMX Bike Track Ian Galloway Park is something that is under utilised. This bike track is not used everyday.

Every day the locals use Johnstons Hill as running, walking and tramping trail, away from the pollution of traffic.

Many walk there dogs there, **everyday**.

Many retired folk use this track, along with senior staff from the British High Commission, **everyday**.
It is part of this very special place, New Zealand.

People from all over Wellington come at the weekends to use Otari and the Karori cemetery part of Johnston Hill Reserve.

Many young Karori families have started to use the Skyline as well as Johnstons Reserve tracks.

Preschoolers and young primary school children.

The bikes on the Skyline have become a hazard to the young and older users. The bikes do not give way, even on the single lane track between Makara Road and the Parkvale Road farm.

Walkers have to give way to bikes on the Makara Bike Tracks.

The bush around the cemetery is an important resource for teaching the young about our native trees, ferns, fungi. There are many excellent examples on the edge of the track e.g. climbing Rata, Rewarewa, Kohekohe that are not seen by many.

There is a very important stand of Kohekohe in the Johnstons Reserve near the Karori Cemetery. Such a large stand is now rare in New Zealand.

The trees are a source of food for our native birds which are now frequenting the area in large numbers when each type of tree is in flower or the seeds mature.

The noise of bikes and humans are not going to be conducive to this continuing.

There are Tuis, Kereru, Kaka, Fantails, native Parakeets, etc

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This is one of the rare pieces of regenerating forest in the area.

The Manky Gully is part of the Kohekohe stand. Please do not use the bush/ forest.

Manky Gully is used by keen walkers and trampers. Please do not use.

The streams will become muddy from the run off from the bikes. There a number of small streams in the forest. This will not be good for the native fish and other fauna such as eels which I believe are a protected in the Otari Bush reserve so I assume they would be protected in the Johnstons Reserve.

I can see from a Satellite view along the Skyline the bikers have created a number of new tracks. This could increase the risk of slips and runoff into people properties.

Walkers and runners do not do the same damage as bikers, especially in the wet.

This area is of high ecological value for the people of Wellington. Gives people of all ages and ability a chance to see what New Zealand Forest is like.

There is wheel chair access from Fletcher Look out carpark to a flat short trail.

BIKERS have a very large proportion of Karori already.

I am not totally convinced this area is any different from the Pine forest behind Karori Park.

I do note there have been a number of Pine trees and branches that have fallen over the past couple of years.

Makara Bike Park

Karori Park Pine Tree track

Karori Park

Karori Park Childrens Mountain Bike Circuit

BMX Bike track in Ian Galloway Park

Wright's Hill

Tracks.org.nz and similar sites have 20- 30 tracks/rides which include Karori.

If there is to be any development of bike trails in the Pine Forest **I suggest the only access be from the Skyline.**

There are already bikes coming through areas they are not supposed to be in, including Wilton Bush.

By using the Cemetery to Skyline track and the Ridgeline track there will be bikes everywhere.

The map and the inclusion of Manky Gully suggests to me, that it is more than the Pine Forest they are including in their Proposal

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Please let us have a small piece of regenerating forest for walkers young and old.

We can't all bike. Bikes are expensive to buy.

Falling off a bike, means injuries which take a longer to heal for people over 65. It is important for us to keep up our exercise to maintain our health.

For the older person walking on tracks such as we have at Johnston Hill and Otari helps us to maintain our ability to balance effectively. Walking in the foot path does not do this say the experts.

This has been put together very quickly this evening.

Please do not hesitate to contact me. [REDACTED]

Thank you.
Sally Mann

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**Submission to the
Wellington City Council
Outer Green Belt
Management Plan
March 2019**

Versailles Street Residents Group

25 March 2019

Contact Person: Sasha Calhoun



OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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Executive Summary

This Submission on the Draft Outer Green Belt Management Plan 2019 (the Draft Plan) is from the Versailles Street Residents Group.

The Versailles Street Residents Group (the Group) is an unincorporated body made up of residents who own properties on the eastern side of Versailles Street, Croydon Street and (one) property on Messines Road. The Group's properties all border land known colloquially as "the Versailles St Strip" (the Strip). In the Draft Plan, the Strip is referred to as Map reference 6.2.3, 6.2.4 and 6.2.11 (see Appendix C).

We commend the overall purposes and objectives of the Draft Plan. As a group, we love the vibrant native birdlife that surrounds us given our location. Many of us are members of Zealandia and take great pride in the benefit it provides to us and our city.

However, at the same time, we do not consider that rigid application of parts of the policy, as seems to be the case in relation to the Strip, is necessary, or indeed desirable, to meet the purposes and objectives of the Draft Plan.

The Versailles Street Residents Group (the Group) are deeply concerned about the aspects of the Draft Plan that relate to the Strip. The Draft Plan proposes three options in relation to the Strip. These options are (1) complete revegetation of the Strip; (2) a public walking track; and (3) reclassification as a reserve. A summary of these concerns, as well as general background and history, follow. More detail is included in the body of this submission.

- i. The Versailles Street Residents Group has a long history of engaging with the Wellington Regional Council (the Regional Council) and the Wellington City Council (the City Council) over issues relating to the Strip. This includes a series of agreements and resolutions, all of which recognise and commit to protecting the security, privacy and views of the Versailles Street residents (paras 40-44 and Appendix A).
- ii. The Draft Plan does not acknowledge maintenance activities carried out over many years by residents with the full knowledge of the various Council land owners and which have provided mutual benefit. Agreement with the Regional Council to continued use and maintenance was one of the agreements to which the transfer of land to the City Council was subject (paras 3, 4, 38-43)
- iii. The Draft Plan states the Strip is reserve. It is not reserve and has never been reserve. The land is historically part of the Karori Reservoir title (para 11 and Appendix A).
- iv. Increased fire risk due to revegetation (paras 6-7, 51-55, Appendix B).
- v. Feasibility of a walking track given the adjacent existing track, additional cost, and steep nature of some of the terrain, and concerns over security and privacy. (para 8-10, 56-58).
- vi. Negative impact on the sense of community (paras 45-49).
- vii. Potential loss of sunlight, as a result of revegetation, and resulting detrimental impact on properties. (para 50).

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- viii. Public Access to the Strip: Resident's concerns over security and privacy risks have been recognised repeatedly over many years by the various Council landowners and the Karori Sanctuary Trust. (paras 56-58).
- ix. Loss of views due to revegetation and the consideration of the value of views by various Acts (paras 63-65).
- x. Significant negative impact on property values: estimated to be \$180,000-\$300,000 (paras 59-62).
- xi. Lack of consultation from the Council (paras 67-74).
- xii. We question whether Council has either the resources or the will to properly maintain either the Strip or the bush buffer. Working with us, as residents, will deliver a superior environmental outcome.

The Draft Plan represents a fundamental change to the Council's long established position in relation to the Strip without regard to, or consideration for, its previous commitments, principles of good faith and effective consultation, the longstanding use and maintenance of the Strip by residents and the extensive history of this matter between the City Council and residents.

The Group's Submission

The Group's submission is that:

- Provisions in the Draft Plan relating to the Versailles Street Strip revert to the wording currently in the 2004 Plan.
- The City Council, Zealandia and our Group acknowledge the extensive history of this matter and seek to resolve the ongoing use and maintenance of the Versailles Street Strip by residents and the public in a mutually acceptable manner.
- The Council acknowledges the need to maintain the existing firebreak.
- The Council reconfirm its previous commitments to protect the privacy, security and views of residents.
- Until the ongoing use is resolved, the Versailles Street Strip not be reclassified as reserve.

Request to be heard

We request an opportunity to be heard when the Council subcommittee meets to take oral submissions.



The Draft Plan

1. Our concerns relate to the following section of the Draft Plan (sec. 6.6.2.1):

There are 21 encroachments of private use from adjoining residential properties with addresses on Versailles Avenue (sic) and Messines Road onto the Council-owned reserve land. The encroachments vary in extent and are mainly gardens, lawns and outdoor uses (such as trampolines). The private use is contrary to the purpose of the reserve land, which is for public benefit; in this case a particular role as part of the Zealandia perimeter. The Council considers that the land should be completely revegetated to strengthen the natural barrier between housing and Zealandia, although an additional option could be considered of formalising a walking track through the strip of reserve from the scout den to the reservoir access entrance on Messines Road.

the related action point (sec. 6.6.3.1, point 2):

Begin the process of removing the private encroachments on the strip of reserve land above the western slopes of Zealandia, where a single water reservoir is located, in order to revegetate it as a vegetation buffer between Zealandia and the adjoining residential properties, keeping just a service vehicle access way for maintaining the water reservoir.

and the proposed reclassification of the Strip as Scenic B Reserve in the Reserves Reclassification Schedule (map reference 6.2.3, 6.2.4 and 6.2.11).

2. This section of the Draft Plan, and the proposed actions, misrepresent the current status of the land and its history, and overlook important considerations about its purpose.
3. **Maintenance – not encroachment:** Rather than encroachments, for at least the last 58 years, the Strip has been maintained and used for various activities by neighbouring residents with the full knowledge of the various boards and councils which have successively owned the land. This has been at no cost to those boards and councils. Prior to its transfer to the City Council in 2004, the Regional Council, and the Regional Water Board before that, specifically endorsed our use and maintenance of the Strip as being of mutual benefit and an agreement to that effect was in place. We give detailed evidence of this below.
4. Maintenance activities carried out over the years include weed control, gorse removal and mowing. While we acknowledge that there are some limited genuine encroachments onto the Strip (which we are prepared to resolve with the Council), these maintenance activities are not encroachments as that term is understood in law or defined in Council policy. (Town Belt Management Plan 2018 – please see section 21 below) Our maintenance activities are, in effect, no different to the sorts of activities carried out on road reserve which the Council actively encourages. They have ensured that the Strip has been properly maintained as open space so that it can continue to operate as an effective fire break.
5. The Draft Plan proposes three options, which do not appear to be mutually exclusive, in relation to the Strip. These options are (1) complete revegetation of the Strip; (2) a public walking track; and (3) reclassification as a reserve. Our specific concerns in relation to each option are as follows:



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6. **Complete Revegetation:** Impacts for residents include the loss of a sense of community, loss of sunlight, increased fire risk, loss of security and privacy, reduced property values and a loss of views (discussed further below). These collectively demonstrate that complete revegetation would certainly not be an option or outcome the Group would be comfortable with. Of all of these, the increase of fire risk is probably the most compelling. In times of climate change and increased likelihood of droughts, revegetating a currently functioning firebreak would increase the risk of fire to the Group's residents. As a recent High Court case involving Gisborne District Council shows, there is a corresponding risk and potential liability to Council (see paras 119-120, 128). We are also deeply concerned at the potential for revegetation to destroy our existing longstanding views (see paras 63-65) and the potential impact on loss of sunlight to our homes (see para 50). Our submission shows that the City and Regional Councils and Karori Sanctuary Trust have made multiple commitments to protect our views, privacy and security.
7. At the moment, Council enjoy the benefits of the Group maintaining the firebreak Strip, which is at no cost to Council. The Group is willing to negotiate a MoU for the ongoing provision of these maintenance services, potentially widening the scope of the area we maintain to include active control of invasive weeds in the bush buffer area.
8. **Walking Track:** The Group are bemused as to why Council would see benefit in putting in a walking track at the back of resident's houses, when an existing track already exists running along the Zealandia fence line – which in many cases is less than 10 meters from the Strip. The current track was intentionally and strategically positioned as a result of consultation with residents in the 1990s. This existing Zealandia fence line track is already well used by walkers, runners, dog walkers and mountain bikers, as well as Group residents. For track users, despite being in relatively close proximity to urbanisation, the experience is entirely nature focused and peaceful. Takahē and other wildlife can be observed up close though the fence. Users are insulated from domestic noises and the sight of houses and residents.
9. To create another track within metres of this existing track would undermine a solution that already sensitively resolves the needs of residents, public and Zealandia. In doing so, it would place home owners and the public in close proximity creating lesser experiences for everyone. In some cases, due to the constrained nature of the land, the public would be unavoidably forced to within a metre or two of private dwellings. As discussed further below, residents' properties were never built to be secure at the back, as the area behind them was off limits to the public. A track would completely compromise the security and privacy of many of our homes. It would completely contravene repeated Council agreements with us, and past Council resolutions to that effect.
10. Not only would this additional path add no meaningful value, the creation and then maintenance of it would be a cost to Council. Given the steep nature of the sections behind no. 21 and between no. 37 and no. 43, it is even questionable, if a path could be built without extensive earthworks. Due to the increased security and privacy risks to residents, combined with no additional practical value, we do not see the value to Council in pursuing this.

The image on the following page shows the existing Zealandia perimeter track, existing public roads and tracks, property boundaries and Lot 3 boundary. As

can be seen the existing perimeter track really runs close to existing property boundaries, in one case only 4 meters away (as depicted on the second image).





11. **Classification as a Reserve:** The land is historically part of the Karori Reservoir title and was originally established as a firebreak. Section 6.6.2.1 of the Draft Plan states that the Strip is Reserve. It is **not** reserve and has **never** been reserve. The Strip has gone through a succession of owners over the years and is currently owned by the Council in fee simple and is zoned as a conservation site. Importantly public access to the Karori Reservoir was prohibited from between the 1870s and 1992. The Group formally oppose its reclassification as a Reserve unless and until all issues relating to its use have been resolved between the Group, Council and Zealandia.

The 2004 Plan and our submission

12. The 2004 Outer Green Belt Management Plan states that:

This land bordering Versailles Street has been the subject of discussion as to its best use and status. As public land purchased for sanctuary purposes by Wellington City Council, it should be protected. However, it has been maintained and used in common by Versailles Street residents for many years as an open green strip bordering 10 or more houses on the eastern side of the street. The present title boundary runs very close to some of these houses and the area may not work well as a reserve without some rationalisation of this boundary and clear definition of its use and management. The land provides excellent views of the valley and should be retained for public enjoyment and as a buffer to the Sanctuary.

with the action to:

Resolve issues in consultation with adjoining residents and the Sanctuary Trust, taking account of the wider community's interest in the land

13. However since 2004, the Council has made no effort to "resolve issues" and no consultation with adjoining residents has occurred (discussed further below).



14. Our submission is that we should go back to the 2004 plan, which recognises the mutual benefit to Council, residents and the wider public of the current uses of the Strip. We would further like to meet with Council officers and representatives from Zealandia in good faith to finally resolve these issues. This is consistent with the Council's own commitment in the Draft Plan to "promote co-operation between the Council, neighbours, stakeholders and the community in regard to managing the Outer Green Belt".
15. Accordingly, the Group's submission is that:
- Provisions in the Draft Plan relating to the Versailles Street Strip revert to the wording currently in the 2004 Plan.
 - The City Council, Zealandia and our group acknowledge the extensive history of this matter and seek to resolve the ongoing use and maintenance of the Versailles Street Strip by residents and the public in a mutually acceptable manner.
 - The Council acknowledges the need to maintain the existing firebreak.
 - The Council reconfirm its previous commitments to protect the privacy, security and views of residents.
 - Until the ongoing use is resolved, the Versailles Street Strip not be reclassified as reserve.
16. We have given considerable thought to potential options to resolve these issues in a way that meets the purposes and objectives of the Draft Plan but also respects our longstanding interest in the Strip and addresses our concerns.

Potential options could include:

Memorandum of Understanding (MoU) with City Council

17. The Group would be prepared to enter into a MoU (or similar arrangement) with the City Council. This would formalise our relationship and each of our responsibilities and obligations. Terms could include:
- a. Ongoing maintenance by residents.
 - b. Potential planting/revegetation in the widest areas of the Strip that does not impact on existing views.
 - c. Public access is not prevented, but at the same time not encouraged due to the privacy and security concerns already outlined. We note that the topography of the Strip does make public access difficult.
 - d. Views, privacy, security and sense of community are maintained.
 - e. In return, residents actively remove weed species from the bush strip beside the Sanctuary (i.e. take on a greater responsibility for maintenance than just removing gorse and mowing).
 - f. Ensuring the purpose and objectives of the Draft Plan are met.
 - g. Commitments regarding removal and ongoing management of genuine encroachments.



18. The potential outcome of such an arrangement provides considerable benefit to Council. Residents would actively improve the ecology of the bush surrounding Zealandia to a level greater than Council could achieve with its own resources. The Council avoids any ongoing maintenance cost other than supplying some appropriate plants. The residents are likely to be supported by Karori Kaitiaki Inc. (KAKA), Karori's recently established environmental restoration group. The purpose represents a permanent solution which would achieve the purpose, objectives and policies of the Draft Plan and be acceptable to residents.

Encroachments

19. The Group are prepared to work with the City Council to resolve the genuine encroachments on the Strip in a mutually acceptable way. For example, those residents with genuine encroachments could commit to either removing them (within a reasonable time frame) and/or enter into a formal licence arrangement with the City Council. Such arrangements could be consistent with policies in the Draft Plan.
20. We are also prepared to ensure that no new genuine encroachments occur. A partnership between us and the City Council will ensure that these issues can be resolved in a timely and respectful manner.
21. Council has specifically determined that mowing and garden beautification do not constitute 'encroachments'. According to the Town Belt Management Plan, approved just last year (2018), Policy 9.6.8.20 says:
22. *'Botanical enhancements: These are small areas of land that are maintained and/or enhanced by a neighbour through planting or vegetation management in keeping with the Town Belt values and character. These are managed by way of a 'letter of understanding', which must be obtained by anyone who has or proposes to undertake 'botanical enhancement'. For the purposes of managing encroachments, botanical enhancements are not considered encroachments and therefore are not by default prohibited.'*
23. It is worth mentioning here that Council actively encourages and relies on many thousands of residents mowing and maintaining road reserve, and does not consider these to be encroachments. That is clearly a reflection that Council simply does not have the resources to undertake this work. We suspect it would be similarly unable to resource managing the Strip, or the adjacent bush buffer.

Reclassification of the Strip

24. The Draft Plan also proposes to reclassify the land as Scenic B reserve. The Group strongly oppose reserve classification at this point until issues have been resolved, and Council has fulfilled its longstanding undertakings.

Sale and Purchase of all or part of the Strip to residents

25. As can be seen from the history in Appendix A, this is an option which has been considered by Council on a number of occasions in the past. On one occasion, formal offers were made but could not be accepted because the Council didn't own the land at the time it made the offer.



26. The residents would be prepared to again consider a sale and purchase arrangement over some or all of the Strip. This could be done in a way that continues to ensure the Strip is kept as open space and not built on.
27. For example, some form of communal ownership with restrictive covenants could provide a mutually acceptable outcome. The Strip could be held communally by neighbouring residents and would not be able to be built on or developed. It could remain with Conservation site zoning. Such an option would be in keeping with the principles of previous Council resolutions in 1998, though the arbitrary 5 metres should be replaced by the width of the Strip less any agreed planting area.
28. The outcomes for the City Council is that it would receive money to reinvest in acquiring land (there are some worthy candidates in the area). The Strip would maintained in accordance with a MoU (or similar arrangement) and restrictive covenants so that it continues to be open space for conservation. Importantly, building or development would be prevented. Ongoing maintenance costs and responsibility for Council are also avoided.
29. It is in the best interests of both our Group and the Council that this long outstanding matter should be resolved once and for all, and to the satisfaction of all parties. For Council this is just a small piece of the Outer Green Belt. For us as residents, the way it is managed is critical to our lifestyle, amenity, privacy and security, sense of street community, and our property values.
30. In what follows, we present detailed evidence of the history of the Strip, the Group's concerns about the Council's proposed changes to the Strip's use, and the lack of consultation from Council. This supports our submission above.

History of the Strip

General Background and History

31. The Group has a long history of engaging with the Regional Council and the City Council over issues relating to the Strip. The Group was originally established in the mid-1990s when concerns began to arise about the siting of the Zealandia boundary fence as it pertained to the Strip and the resulting impact on the Group's properties. Key concerns were impact on privacy, security and views.
32. The Group have also been party to proceedings in the Environment Court in 1996 about rules relating to conservation sites in the City Council's district plan and was a member of the original Community Liaison Group for the Karori Wildlife Sanctuary (now Zealandia).
33. Detailed information on the history of the Strip and of the various interactions and dealings with the various Councils over the years can be found in Appendix A. These show that there have been a long series of agreements and resolutions involving the Regional Council, the City Council, and the Sanctuary Trust. All of these agreements recognise and commit to protecting the security, privacy and



views of the Versailles Street residents. A summary is set out in the following paragraphs:

34. The land is historically part of the Karori Reservoir title. The Draft Plan states that the Strip is Reserve. It is **not** reserve and has **never** been reserve. Importantly, public access to the Karori Reservoir was prohibited from between the 1870s and 1992.
35. It was originally established as a firebreak when the houses in Versailles Street were built during the early 1960s. At that time the whole area was cleared. We attach a photo from the time of initial development as part of Appendix A. The Strip remains as a 'gorse lawn' and it continues to be maintained as open space by the residents today.
36. Residents have never prevented public access onto the Strip, although we acknowledge that the topography of the site does make public access difficult, and public access would significantly adversely impact on our collective privacy and security, given the way in which many of our properties are designed (with the assumption that the area was and would remain a public excluded water supply area). Council has also repeatedly recognised the importance of preserving our privacy and security.

Specific and Extensive History of the Issue

37. As can be seen from this submission, there is an extensive and longstanding history to this matter. We support the Council's desire to resolve this but not in the way proposed in the Draft Plan which has been put forward without genuine consultation with us.

Resident maintenance has provided mutual benefit

38. The Draft Plan makes no mention or acknowledgment of the maintenance activities that have been carried out over the years with the full knowledge (and, in the case of the Regional Council, full permission) of the various landowners.
39. These activities provide mutual benefit (as was acknowledged by the Regional Council). As residents, we have benefited from the open space that adjoins our land but, at the same time, the Council has not had to maintain or expend any money in relation to a piece of its land for over 58 years. We estimate the benefit in dollar terms to the Council to be in the vicinity of \$600,000.

Agreement with WRC transferred to WCC

40. The Group's use and maintenance activities was the subject of an agreement with the Regional Council. Clear evidence of this can be found in a report to the Utilities Services Committee of the Wellington Regional Council dated 7 March 1997. The relevant excerpt states:

*"The boundary is not fenced behind a number of properties on Versailles Street and Messines Road. House owners have historically made use of the land directly behind their properties to varying degrees. The "encroachments" have occurred for many years, certainly since the land was transferred to the Wellington Regional Water Board. **There was an agreement that the use and maintenance of the land by adjoining property owners meant***



*that the Council (or Water Board) did not have to control vegetation growth in these areas and therefore provided mutual benefit.*¹⁷

41. The same report concluded with a series of recommendations regarding the proposed transfer of the Karori Reservoir catchment to the City Council at no cost, but subject to conditions. One such condition was that "the land should be transferred subject to all existing lease, licences and agreements."
42. The City Council accepted the transfer subject to this condition. Resolutions of the Council in January 1998 included a specific condition of transfer to "[resolve] the boundary encroachments areas by Wellington City Council **in accordance with any Wellington Regional Council commitments**".
43. Our agreement with the Regional Council was one of the agreements to which the transfer of land was subject. Furthermore, the Council has previously undertaken to resolve "boundary encroachment areas" in accordance with any Wellington Regional Council commitments. Our agreement with the Regional Council is the commitment to which this resolution refers.
44. Despite the change of ownership, the residents have continued to perform their maintenance obligations, and enjoyed the benefit of their usage rights, under this agreement.

The Group's Concerns

The Group have the following concerns with the proposed changes to the Strip in the Draft Plan:

Impact on the Sense of Community

45. For our community, the Strip is much more than a physical location. It is a place where bonds among neighbours are strengthened, and where a sense of belonging is fostered. It is part of our community identity.
46. Residents of Versailles Street hold an annual barbecue on the Strip, inviting all households living on the street and not just those in the Group. Bringing the neighbourhood together regularly in a common space near our houses has strengthened the sense of community and enabled us all to get to know each other better.
47. There are a number of families whose houses back onto the Strip. The neighbourhood children freely roam across this area to visit each other's houses. Parents feel a sense of comfort that their children are safe and have a good knowledge of their neighbours, without the need to navigate driveways or cross roads. This adds to our sense of community and embodies the saying 'it takes a village to raise a child'.



48. Goal 1 of the Wellington City Council's 'Wellington Resilience Strategy' (2017) is 'People are connected, empowered and feel part of a community' (p41) <https://wellington.govt.nz/about-wellington/wellington-resilience-strategy>
49. The Resilience Strategy also says 'Our connections in the community provide us with informal support and shared resources, such as locally grown food, car-pooling options, and opportunities to socialise'. This is exactly what the Strip provides our community with. The options proposed in the Draft Plan puts this sense of community at risk.

Loss of Sunlight

50. Potential loss of sunlight as a result of revegetation is a concern for the Group. Many properties have been purchased based on the amount of sunlight they receive, keeping properties dry and warm and subsequently preventing dampness. Sunlight and warmth is highly valued in the Group's homes on the Strip. Further vegetation would compromise the amount of sunlight the properties attract and this seems detrimental and contrary to what is currently promoted about health issues caused by damp/cold housing. The Group believes that the loss of sunlight will have a significant negative impact on their properties which should be seriously considered before any plans for revegetation are imposed.

The images on the following page show a depiction of the impact that a loss of light due to revegetation would have.



Increased Fire Risk

51. The Group's homes are adjacent to the top of a very steep slope that is densely forested. In extreme conditions that forest could burn. The steepness of the slope means a fire would move quickly. For situations like ours, with adjacent



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steep forested slopes, Fire and Emergency New Zealand² recommend that a distance of 10 to 30 metres be left clear as a firebreak (discussed further in Appendix B). The maximum width of the mowed area of the Strip is about 26 metres. As the owner of the adjoining land (Zealandia), the Council have a moral and legal duty to residents to mitigate, rather than add to, fire risk. A clear area acts as a defensible zone from which fire fighters can access a fire.

52. With the increased risks posed from Climate Change, we expect to experience more extreme weather events. These will present themselves as periods of intense downpours and flooding and as extended periods of low or no rainfall. As a C40 Council signatory, Wellington City Council acknowledge the increased risks posed by Climate Change. Following the recent 2019 bush/forest fires encountered in the Nelson Region, Otago Region and Canterbury Region, the Group are very concerned about losing the existing firebreak. It is there for a very good purpose.
53. The Group are also concerned at the proposed revegetation of the Strip and the apparent naivety from Council that planting of natives would act as an equivalent to a firebreak.
54. In a response to a request for official information the Council has advised:
- There is added benefit from planting fire resistant species such as Myoporum laetum, Phormium cookianum, Griselinia littoralis, Pseudopanax spp, Fuchsia excorticata, Piper excelsum, Coprosma spp, Hebe stricta, Pittosporum spp, Melicytus ramiflorus, Aristotelia serrata. There is a list of approx. 40 species which are considered fire retardant or have low flammability that occur naturally in the Wellington area.*
55. This is a misinterpretation of the scientific research on this issue.³ While some native species are more flammable than some introduced species, the cited research papers all include the caution, that there is no such thing as a fireproof plant. The critical factor in any wild fire is how much fuel there is available to the fire as it spreads. The existing firebreak of mown grass (and mown gorse) would leave little fuel in the path of a wild fire burning up the heavily forested slope adjacent the Strip. In terms of minimising the risks of fire, maintaining the Strip as a firebreak is the safest option.

² The link is: <https://fireandemergency.nz/at-home/rural-home-fire-safety-checklist/>

³ *Two Rural/Urban Interface fires in the Wellington suburb of Karori: assessment of associated burning conditions and fire control strategies*, LG. Fogerty, FRI Bulletin No 197, 1996: <https://scion.contentdm.oclc.org/digital/collection/p20044coll13/id/18/>
A Flammability Guide for Some Common New Zealand Native Tree and Shrub Species, New Zealand Fire Service Commission Research Report Number 20, November 2001: <https://fireandemergency.nz/assets/Documents/Research-and-reports/Report-20-A-Flammability-Guide-for-Some-Common-New-Zealand-Native-Tree-and-Shrub-Species.PDF>; *A quantitative assessment of shoot flammability for 60 tree and shrub species supports rankings based on expert opinion* <https://researcharchive.lincoln.ac.nz/bitstream/handle/10182/6884/WF15047.pdf;sequence=1>



Impact on Security and Privacy

56. There was no expectation that the Reservoir or the Strip would be opened to public recreational use at the time the homes were built (1961 to 1964). The design and location of the houses along the Strip were therefore undertaken without any anticipation of public access along their rear boundaries. It is a very narrow section of land in places. Houses along the Strip feature lounges and bedrooms with large windows looking out over the Strip. Agreeing to a walking track just a few metres away would compromise the privacy and security of residents. At least one resident is a single woman living on their own.
57. Extracts from the Sanctuary Establishment Trust Report recommendations in relation to Versailles Street approved by the City Council Culture and Recreation Committee (paras 84-89), show the City Council previously accepted that protection of views, privacy, security and amenity value are important.
58. Any potential solutions to address privacy and security, for example, the creation of a fence between the potential future walking track and residents' homes, would also not be feasible or desirable. A fence would be a cost to Council. In addition, to protect privacy and security, the fence would need to be quite high. This would impede the views of residents, which the Council has already acknowledged is important. The narrowness of some sections of the Strip would also impact on the feasibility of a fence or a row of trees between the walking track and property boundaries. For example, behind number 39, the Strip is only approximately 4 metres wide between the property boundary and where the ground slopes steeply down to the existing Zealandia fence line walking track.

Impact on Property Values

59. A valuation has been undertaken by a local real estate agent who knows the neighbourhood and area well and has been selling in the area for many years.
60. An appraisal was conducted based on the possibility of a walking track and /or fence/planting up to the boundary. These would likely compromise the view, privacy, security and sunlight, all of which would significantly impact the value of all properties on the Strip.
61. All of the residents in the Group purchased with the current situation in place. In some cases that went back to the 1970s. In all cases there was no expectation of Council moving goalposts agreed during the 1990s and acknowledged in the 2004 Outer Green Belt Management Plan.
62. Initial advice from Real Estate agents is that privacy, security, sun, view and fire safety loss would correspond to a drop of 15% to 20% in the value of properties. This represents a market value loss of between \$180,000 – \$300,000. Some properties would be more impacted than others but almost all would be affected.

Loss of Views

63. The Group regard views as a really important part of our enjoyment of the Strip. The current District Plan does not protect views per se other than specified view shafts from public spaces. However it does limit building heights which often protects views from buildings behind and further up a hill. The District Plan and Resource Management Act also consider amenity values which includes views.



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Views are also a very important consideration of property value. Part 6 of the Property Law Act 2007 gives landowners the ability to seek a Court order requiring another landowner to remove or trim any tree, shrub or plant. The Court will consider whether the order is necessary to remove, prevent, or prevent the recurrence of, among other things:

- an undue obstruction of a view;
- an undue interference with the use or enjoyment of the applicant's land by reason of the fall of leaves, flowers, fruit, or branches, or shade or interference with access to light; or
- an undue interference with any drain or gutter on the applicant's land, by reason of its obstruction by fallen leaves, flowers, fruit, or branches, or by the root system of a tree;

64. All of these things could reasonably be expected to occur should the Council revegetate the Strip. Landowners, when considering retaining existing trees must consider the impact of views on their neighbours. How much more so when thinking about putting in vegetation which isn't currently there?

65. Our views are a really important part of the amenity we enjoy as homeowners. For some of us that includes the harbour, parts of the city, and the Orongorongo and Tararua Ranges. For some of us it is the wide sweeping views across the Sanctuary valley to Hawkins Hill and beyond. The views provide a sense of openness and a connection to the wider city and harbour. The Group enjoy seeing shipping activity on the harbour, aircraft coming and leaving, and the city's fireworks displays.

Consultation and the Council's approach

66. The Group commend the overall purposes and objectives of the Draft Plan. As a Group, we love the vibrant native birdlife that surrounds us given our location. Many of us are members of Zealandia and take great pride in the benefit it provides to us and our city.

67. However, at the same time, we do not consider that rigid application of parts of the policy, as seems to be the case in relation to the Strip, is necessary to meet the purposes and objectives.

68. In particular, we note:

- a. One of the three main purposes of the Draft Plan is to "promote co-operation between the Council, neighbours, stakeholders and the community in regard to managing the Outer Green Belt". The Council's approach to the Strip is not in keeping with this purpose. However, reverting back to the wording in the 2004 Plan and then making a genuine effort to resolve the outstanding issues would be.
- b. The Draft Plan openly admits that there are separate site-specific plans that have been developed to address complex site issues and objectives requiring more detailed planning. Therefore, there is precedent for different applications of the Draft Plan depending on site-specific characteristics.



- c. One of the guiding principles is that “community participation in managing the Outer Green Belt is enabled and supported”. This is exactly what we have been doing for the last 58 years.
- d. The Draft Plan contains, as one of its objectives, “to enhance existing values through land management partnership with adjacent land owners”. There are numerous policies relating to community partnership (section 4.6.2.2) and partnership with neighbours (section 4.6.2.3). We are more than willing to partner with the City Council in relation to the ongoing management of the Strip.
- e. The Draft Plan contains a policy to “use leases, licences and easements where necessary to facilitate appropriate use and good management of reserve land”. Such arrangements could provide useful mechanisms to formalise resident use of the Strip and/or resolve existing genuine encroachments.
- f. The ongoing use of the Strip as a fire break can be supported by the policies relating to management of fire risk.

Lack of consultation from Council

- 69. In the 13 December 2018 report about the 2019 draft plan, Councillors were advised that officers had “comprehensively reviewed the 2004 plan” and had “undertaken community engagement to inform the plan review.” That “engagement” did not include our Group. Despite the “action” stated in the 2004 Plan, there was also no contact at all made by Council in developing the Draft Plan.
- 70. On 13 December 2018, Wellington City Councillors were provided with an Engagement Report.⁴ Part 3.2.2 of that report advised that landowners within the concept area were to be advised about green belt values by early engagement, seeking comments on issues and opportunities they have identified over the years. Although members of our Group are landowners within the concept area of the 2004 management plan, we were not contacted as part of the preparation of this report.
- 71. The engagement principles that were to be followed included the following:
 - A commitment to open and honest communication;
 - Provision of regular and relevant information;
 - Views received in feedback were to be taken into account; and
 - Every effort to be made to resolve issues in a proactive, timely and appropriate manner that is flexible and adaptable if required.⁵

⁴ *Engagement Report / Outer Green Belt Management Plan Review, Attachment 3, December 2018*

⁵ *Engagement Report, p 25*

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72. In describing partnerships with neighbouring property owners the 13 December 2018 report states, "The principle of being 'good neighbours' is also emphasised as the basis for managing potential boundary issues."⁶
73. It has been the experience of our Group that the Council's actions have not matched its words. The failure of anyone from the Council to contact us during the development of the plan has two plausible explanations. Either the officers overlooked our long outstanding issues or else they deliberately did not contact us. Either way it was not consistent with the principle of being a good neighbour.
74. We are concerned that the Council's stated intentions in the Draft Plan are not in good faith given the lack of consultation and discussion contemplated by the 2004 Plan and the longstanding history of use and maintenance of the Strip. We are also concerned that statements made to us by Council officials indicate that the final decision on this aspect of the Draft 2019 Plan is a *fait accompli*. If correct, such an approach is also not in keeping with the legal requirements for effective consultation.

General Observations

75. The Group note that our concerns about the Draft Plan are not unique. Similar instances of Councils around the country seeking to unilaterally resolve long-standing uses of Council land have been prominent in the media recently. Examples include the Taylors Mistake baches in Christchurch⁷ and maintenance activities around the Te Whau Pathway⁸ in Auckland.

⁶ *Draft Outer Green Belt Management Plan*, Report to City Strategy Committee 13 December 2018, para 51, page 13.

⁷ <https://www.stuff.co.nz/the-press/news/110496241/taylors-mistake-owners-plead-for-baches-to-remain-another-100-years>

⁸ <https://www.stuff.co.nz/auckland/111027977/elderly-auckland-couple-told-to-pay-1800-fee-to-clean-up-public-park>

Appendix A - History

Versailles Street

76. The first house on Versailles Street was built in 1961 and the remaining houses were constructed over the next decade, most in the early years of the 1960s. As can be seen from this 1960 photo taken from the top of Wright's Hill, Versailles Street was bulldozed so that the future houses on the eastern (top) side would all be sited towards the rear of their sections so as to be nearly on the same level as the Strip and, in many cases, built close to, or in one case touching, the rear boundary.



Figure 1. Versailles Street from Wrights Hill 1960

77. The original plans for the Versailles Street development include the Strip and show that it was to be maintained as a fire break. The residents' ongoing maintenance of it ensures that it continues to perform this function.
78. The houses on the Eastern side of Versailles Street were clearly designed to interact with, and have access onto, the Strip. They are all sited towards the rear of their sections so as to be on the same level as the Strip and, in many cases, built close to, or in one case touching, the rear boundary. Given this, if resident use of the Strip is prevented, some residents will have little to no usable flat land given the steep topography of the location.
79. The design and location of the houses was presumably done without any anticipation of public access along their rear boundaries. At the time of the houses' construction, the lower part of the Karori Reservoir (the part adjacent to Versailles Street) had been completely closed to the public for around 90 years, and the upper part for around 60 years. There was no expectation that the Reservoir or the Strip would be opened to public recreational use at the time the Group's houses were built.



80. Consequently, many houses were designed with large windows, low to the ground, facing onto the Strip. There is minimal security from the rear and none of the properties are fenced.
81. This and other photos of the time also clearly illustrate that the only vegetation in the area was grass and a significant amount of gorse.

Wider History

82. The development of the valley where Zealandia is now located is recorded in a Greater Wellington Regional Council history.⁹ The lower dam was completed in 1878 and the upper dam in 1908.
83. Before 1973 the Land was owned and operated by the Wellington City Council through its Wellington City and Suburban Water Supply Board. On 1 March 1973, the land was vested in the Wellington Regional Water Board.¹⁰ The land and functions of the Water Board were in turn transferred to the Wellington Regional Council when the Council was established in 1980.¹¹

Zealandia

84. The Karori Sanctuary Trust was established in 1995 after the water reservoir operations were discontinued. Its management plan for the valley was approved in January 1998. The trust entered into a 30-year renewable lease with the City Council in 1999.
85. The Sanctuary Steering Committee undertook extensive feasibility work from June 1993 including citywide consultation during 1994 to establish whether there was public support for establishing a sanctuary, or whether the reservoir would become an open, unfenced bush reserve. Submissions were open from 1 September to 17 October 1994. 1,840 submissions were received. As part of that feasibility work the Steering Committee looked at fence location.
86. The Group became involved when it became apparent that the initial proposal was for the perimeter fence to run through the middle of the Strip. The impact on views and privacy and security would have been severe and adverse. There was extensive dialogue between the Steering Committee and the Group. Hill and Knowlton, acting as public relations consultants for the Steering Committee noted the importance of good neighbour relations to the project. Neighbours were described as 'Valued Partners'.
87. After initial discussions with the Karori Sanctuary Trust, the Regional Council and the City Council agreed that there were three possibilities for the location of the fence: Plan "A" along the middle of the Strip, Plan "B" along the outer edge of the Strip and Plan "C" slightly down the hill from the edge of the Strip. Both Plans A and B would have had severe adverse effects on residents and would undoubtedly have faced strong opposition through the resource management

⁹Our Water History on Tap, Greater Wellington Regional Council, 2007:
<http://www.gw.govt.nz/history-of-our-water-supply/>

¹⁰ Wellington Regional Water Board Act 1972, s 105

¹¹ The Wellington Region Constitution Order 1980 (Gazette 1980, p 1618), clause 7.



process. Following input from our Group, Plan C was ultimately adopted. That protected residents' views and privacy and security.

88. On 6 December 1994, the Culture and Recreation Committee of the City Council received the report and approved the Wildlife Sanctuary proposal. The Steering Committee had originally considered placing the fence along the Strip. Council resolved that would not happen because of the impacts on privacy and views. Its relevant resolutions to the City Council in relation to Versailles Street were:

Resolution 2 (b) (iii) *'The concerns of boundary residents on the impact of the fence on their views and privacy can largely be addressed.'* and

Resolution 2 (b) (xii) *'That the Karori Reservoir Sanctuary Trust shall note the recommendations made by the Steering Committee as reported in paragraph 5.7.2 of the Summary of Oral and Written Submissions of 29 November 1994 and shall ensure that each is incorporated in the management plan for the Karori Reservoir Sanctuary. In particular, it shall ensure that the fence line does not impede the views from the lounges of the properties Versailles Street adjacent to the strip.'*

89. Paragraph 5.7.2 follows and includes:

- Protecting the amenity value of the Strip;
- Preserving, or if possible improving views
- Keeping the Sanctuary boundary closed from the Scout Den to the lower dam;
- Restoring and beautifying any areas damaged by construction of the fence.



Versailles
Residents
 — GROUP —

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5.7.2. Versailles Street

Explanation: Approximately 13 properties on Versailles Street back onto the Reservoir boundary along an area known as "The Strip". These properties enjoy relatively uninterrupted city, bush and harbour views across the strip which is part of the Reservoir but is jointly maintained by residents. They are concerned that the fence, if placed along the top of the strip, would destroy their views and reduce their property values. They are also concerned that construction of the fence and maintenance road will give the public access to the strip over which they currently have private use of.

Discussion: Extensive discussions have been held with this group and assurances given on some issues. They include;

1. Every effort would be made to maintain the amenity value of "the strip".
2. Every effort would be made to preserve, or if possible improve, views.
3. The Steering Committee would recommend to the Trust that the boundary, from the Scout Hall to the lower dam face, be closed to the public and ways would be investigated to achieve this.
4. Areas damaged by fence construction would be restored and beautified by the sanctuary managers.

With regard to the fenceline the residents group have identified an arrangement

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which would be acceptable to them. It involves lowering the fence approximately 8 to 10 meters down slope from "the Strip" to provide a vegetation barrier between the fence and the Strip. This alignment would involve considerable bush clearance and a greater degree of slope stabilisation and maintenance. The exact placement of the fence relies on a number of slope stability and drainage issues and will need to be carefully surveyed. This was outside the scope of the Feasibility Study process but will be addressed once a Trust is formed.

Conclusion: It is felt that all the concerns of this group can be met. Final resolution rests on agreement of the precise positioning of the fenceline.

5.7.3. Highbury Ridge

Explanation:

Approximately 13 properties at the top end of Highbury Road share a joint title to a legal right of way which is formed on part of the Reservoir. This group is concerned that their right to use this access road may be affected by development of the sanctuary, and also that the public might expect access along it. They also have concerns about the visual impact of the fence and damage during fence construction.

Figure 2. Copy of agreement for fence and buffer.

90. As can be seen from the above extracts, the City Council and Karori Sanctuary have previously accepted that protection of views, privacy, security and amenity value are important. Because the fence was ultimately constructed where it is, privacy and security were able to be maintained by having public access being alongside the fence which runs below a steep bank topped by fairly dense low regenerating bush. Views were similarly protected by the choice of fence location.
91. Karori Reservoir was owned by Wellington Regional Council until 2004. In May 1994 Wellington Regional Council's Operations Committee resolved that:

'The concerns of the residents neighbouring the Reservoir and the assurances of the Steering Committee that the fence line will be built in a way that is satisfactory to all parties be noted.'



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92. The City Council then leased the Reservoir to Karori Reservoir Wildlife Sanctuary Trust. On 6 July 1995, the date of the Trust's founding, MOU agreements were signed between the Regional Council and City Council and between the City Council and Sanctuary Trust. A 'Special Condition' required by the Regional Council was that the City Council would oversee the development of a Management Plan by the Trust. In respect of the Group's issue the Special Condition, included the following:

'It is agreed by the parties that the Management Plan shall specify:

(viii) Matters of resolution regarding the concerns of neighbours about views and access issues.'

93. The Agreement included the resolution of the Regional Council above that referenced the concerns of the residents neighbouring the Reservoir and the City Council's December 1994 agreement stating that it:

'Agreed to address the concerns of boundary residents on the impact of the fence on their views and privacy.'

94. The Deed of Lease between Wellington Regional Council (Lessor) and Wellington City Council (Lessee) dated 4 August 1995 included the expanded obligation on the City Council and Sanctuary Trust that 'it is agreed by the parties that the Management Plan shall specify:

'(viii) Matters of resolution regarding the concerns of neighbours about views, access boundaries and easement issues.'

95. The Sanctuary Trust acting on these obligations developed and in 1997 formally consulted on a Management Plan for the Reservoir title. There are several sections of the Management Plan which are relevant to Versailles Street. The Sanctuary Management Plan remains current and has not yet been replaced.

96. 7.1.12 Fires and fire control notes that *'Fire is a major threat to the integrity of the Sanctuary.'* Subsection (5) notes *'The perimeter track will continue to be managed as a fire break to ensure the safety of the valley from adjacent scrub fires.'* Obviously we do not want to be any more 'adjacent' to potential scrub fires either.

97. 7.2.2 Perimeter Track and Predator Fence says that (8) *'Residents whose properties lie adjacent to the new track will be consulted on the exact location of the track and every effort will be taken by the Sanctuary Trust to minimise the impact of this work on local residents.'*

98. 7.4 Community Involvement and Liaison discusses the establishment and membership on a community liaison group including residents from each of the neighbouring streets. The group was to meet before and after every significant stage of the development of the Sanctuary. While the Draft Outer Green Belt Management Plan is the Council's document rather than Zealandia's, adopting the same principle would have been desirable.



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99. The Resource Consent for establishing the Karori Wildlife Sanctuary was granted in January 1998.¹² Paragraph 13 of the Schedule to that consent required the Trust to establish a community liaison group that included a representative from our Group and was to meet when there was any material development in the Reservoir area. Its purpose was to keep the various parties informed and comment upon and work through issues that affected them.

100. Once the Sanctuary plan had its resource consent the City Council began the process of transferring the reservoir land from the Regional Council to the City Council. By a resolution agreed to in January 1998 the City Council:

Approve[d] the transfer of 249 hectares of land (approximately) from Wellington Regional Council to Wellington City Council and in accordance with a Heads of Agreement based upon the following conditions, ...

*(iv) Resolution of the boundary encroachment areas by the Wellington City Council **in accordance with any Regional Council commitments.***

101. This resolution committed the City Council to resolve boundary encroachment issues "in accordance with any Regional Council commitments." One such commitment was the agreement between the Regional Council and Landowners regarding the use and maintenance of the land (referred to above).

102. Throughout 1998, there were various meetings and discussions between the City Council and residents regarding the Strip. Eventually, the City Council resolved on 30 September 1998 to:

"retain the majority of land on the western border of the Karori Reservoir area for open space purposes and to grant an option to purchase a five metre strip of land (in front of numbers 21-37 Versailles Street) to the adjoining residents."¹³

103. Leaving aside the arbitrary nature of the 5 metres, the potential for sale under mutually acceptable conditions (price, collective ownership, MOU preventing structures) could have been a solution. However, the resolution could not be enacted as it was proposed as a 6 month option and the City Council did not then own the land, and in fact did not own it until 2004, six years later.

104. The agreement was in respect of "Area A" and the "Area B" together with the "Remaining Flat Area" shown in Figure 3 correspond to parts of the strips of land identified on page 14 and 15 of the "Proposed Reserves Classification | OGBMP" (Lots 3 and 4 of DP 313319, CT 52415 and 52416.) The provisions of that resolution relevant to this submission are paragraphs (b), (d) and (f):

- Area "A" (not shown in Figure 3) was to be retained as an essential open space and for water supply but may be developed in future to provide neighbourhood park facilities;

¹² *Application for Resource Consents by the Karori Wildlife Sanctuary Trust Inc. Decision of Independent Commissioners, SR No. 34961, Doc 96185, 13 January 1998.*

¹³ Letter to "the Owner/Occupier" dated 6 October 1998 from Pippa Player, Senior Asset Planner, Land and Property

- Illegal use of access to area "A" was to be actively discouraged, but officers were to explore with adjoining owners how the adjoining owners might participate in maintaining and managing the area;
- Owners of numbers 21 to 37 Versailles Street were to be given an option for six months from 31 March 1999 to purchase area "B" to be held jointly under conservation site zoning;
- If the option was not taken up, area "B" was to be held and managed by the council for open space purposes as a part of the Sanctuary management area.
- The fate of the "remaining flat area" shown in Plan 1 is not directly stated, but by default covered by paragraph (a) of the resolution:

"... that that part of the land not required for maintenance of the predator proof fence and perimeter track ... is retained for reserve purposes and leased to the Karori Wildlife Sanctuary Trust for management."

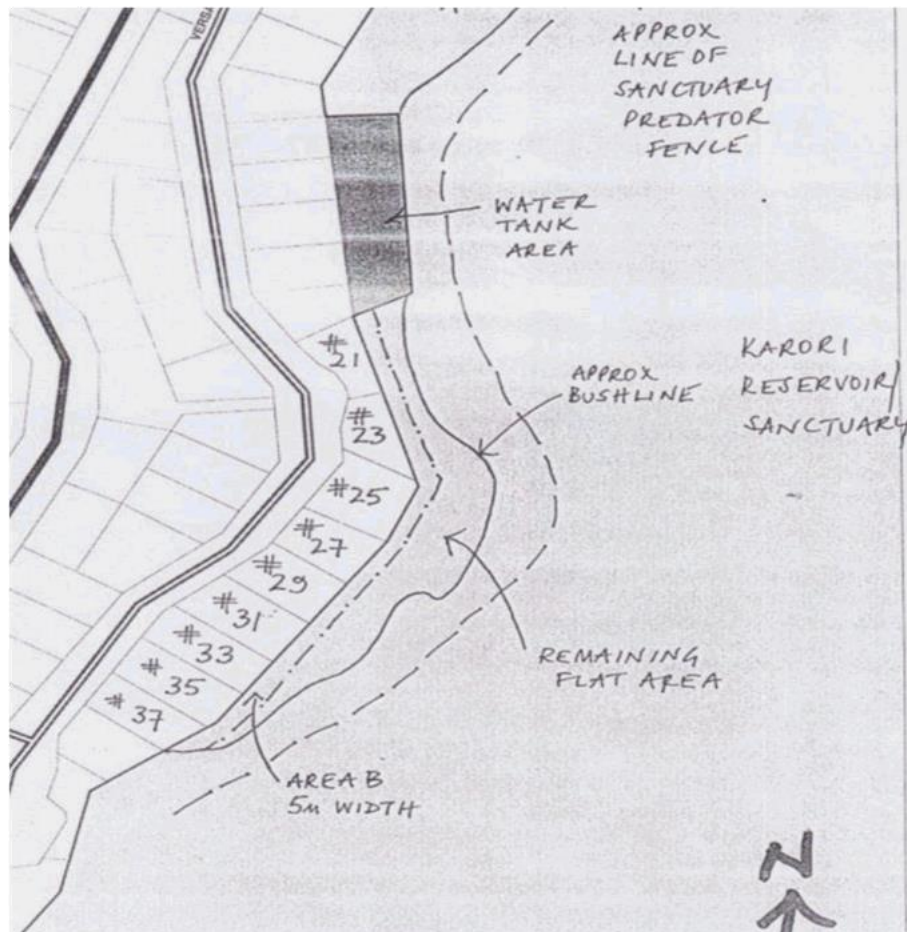


Fig 3. Map of 5 metre area "B"



105. The Strip was specifically included in the 2004 Outer Green Belt Management Plan and included the action reference in Paragraph 11, to “*Resolve issues in consultation with adjoining residents and the Sanctuary Trust, taking account of the wider community’s interest in the land.*” The consistent point is that there have been a long series of agreements and resolutions involving the Regional Council, the City Council, and the Sanctuary Trust. All of these agreements recognise and commit to protecting the security, privacy and views of the Versailles street residents.
106. Despite this, the City Council has made no effort to “resolve issues” and no consultation with adjoining residents in the 15 years since the 2004 Plan was adopted has occurred. This remained the case right up to the release of the Draft Plan in early 2019.

Appendix B – Fire Risks

Fire Protection

107. The Group’s homes are adjacent to the top of a very steep slope that is densely forested. In extreme conditions that forest could burn. The steepness of the slope means a fire would move quickly. For situations like ours, with adjacent steep forested slopes, Fire and Emergency New Zealand¹⁴ recommend that a distance of 10 to 30 metres be left clear as a firebreak, as shown in Figure 4. The maximum width of the mowed area of the Strip is about 26 metres. As the owner of the adjoining land (Zealandia), the Council have a moral and legal duty to residents to mitigate, rather than add to, fire risk. A clear area acts as a defensible zone from which fire fighters can access a fire.



Figure 4. Defensible zones.

¹⁴ The link is: <https://fireandemergency.nz/at-home/rural-home-fire-safety-checklist/>



108. According to information published by various sources, including the Fire Service, gorse is the most flammable plant in New Zealand. The Strip was created as a fire break. Much of it is actually mowed gorse rather than grass, and the recent lack of maintenance of the area behind number 21 Versailles Street has seen gorse growing very rapidly.
109. History is very relevant in respect of fire. In the early to mid-1990s Karori in particular, and some surrounding suburbs were hit repeatedly by arson.¹⁵ Sometimes several times a week, or even a day, fires were being lit in the bush around our community. The sound of fire engines attending fires was obviously just as frequent. It prompted a local councillor to establish Wellington's first Community Patrol. The Police eventually identified the suspected arsonist, but there was never adequate information to charge them. Ongoing revegetation has seen gorse replaced by less flammable plants which has also assisted. It is important though to note that some native vegetation is also quite flammable. (attached list of plants by order of flammability)
110. Suffice to say, fire is a real issue for Karori. Because our properties are at the top of a hill, fire becomes a bigger issue. We are also in a City Council designated 'high wind zone'. When the fire break was created, gorse would have been the dominant plant over large areas of the hillside below us. While gorse has been largely removed, exacerbating fire risk would be an issue, and Council would have duty of care to residents to address that issue.
111. We have had recent history of the massive fires near Nelson this month (February), and the small fire in bush on Te Ahumairangi Hill. In February 2017's Port hills fires, 2,075 hectares of land were burned and 11 houses destroyed or badly damaged. Tragically helicopter pilot Steve Askin was killed in fighting that fire. Three other people were injured. The fire was only declared officially out after 66 days. It is being recognised that New Zealand is underestimating the risks of urban fire. Climate change and drier summers makes this more an issue. We would hate to see this as a reason to cut down vegetation close to houses, but it is a reason not to exacerbate risk. As noted before, the Group's homes are on the crest of a ridge.
112. Fire risks are discussed in part 4.2.2.6 on page 43 of the Draft plan. Fire risks are to be managed by:
- *"rules in the Rules section¹⁶;*
 - *planting fire-resistant species in areas of high fire risk;*
 - *informing the public about fire risks and how to avoid causing fires via on-site signs and other visitor information;*
 - *co-ordinating fire management with Fire and Emergency New Zealand."*

¹⁵

https://natlib.govt.nz/records/20878726?search%5Bi%5D%5Bprimary_collection%5D=Index+New+Zealand&search%5Bpath%5D=items&search%5Btext%5D=New+Zealand+Fire+Service+reports

¹⁶ The only relevant rule (5.3.3.1) is no fires except as permitted under a WCC bylaw.



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113. The explanation given is:

"Fire has the potential to set back ecosystem restoration. The frequency of fires has decreased in recent years, largely because of regenerating indigenous vegetation supplanting flammable gorse, but there will always be a risk from people causing inadvertent or deliberate fire and from lightning strike. Climate change may exacerbate the risk through likely increase in frequency and/or severity of drought conditions."

114. While fire can "set back ecosystem restoration" it can also put properties and people living in them at the boundaries of the outer green belt at risk, a factor not mentioned in the plan. While there is a mention of the adverse effects of climate change, there is no indication that anything is being done to mitigate the "likely increase in frequency and/or severity of drought conditions".

115. The 2017 Port Hills fire and the 2019 fire in the Nelson region have raised the awareness of wildfires on the fringes of urban areas. This new awareness and a lack of adequate preparation were the subject of an editorial in the Dominion Post on 7 February. The editorial referred to a paper by fire scientists¹⁷ that concluded with the warning that councils have a key role in ensuring adequate planning takes place to prepare for such disasters before they happen.

116. The Outer Green Belt has not been immune to wild fires. In the 1993/93 fire season two separate wildfires threatened houses on what is now Montgomery Avenue. The fires are documented in a detailed report by the New Zealand Forest Research Institute (now Scion).¹⁸ The situation of those houses shown on the map on page 3 of that report and in the photograph on page 4 is very similar to the situation of the houses of our group – sited at the top of a ridge with Karori on one side and a very steep hill covered in trees and shrubs on the other. There was even a water reservoir near the houses. Residents were asked to evacuate their houses and it was with great difficulty and some risk that the house were saved.

117. On page 11 of this report, in discussing the risk fire fighters exposed themselves to, it is stated that where fuels are continuous, very extreme fires will breach firebreaks with relative ease. It then makes an estimate of how wide a firebreak is needed and suggested a "rule of thumb" of 1.5 times the flame length. In a later paper by the same author¹⁹ applied findings from his continuing

¹⁷ *Wildfire risk awareness, perception and preparedness in the urban fringe in Aotearoa/New Zealand: Public responses to the 2017 Port Hills wildfire*, Australasian Journal of Disaster and Trauma Studies, Vol 22, pp 75 – 84:
https://www.researchgate.net/publication/330241479_Australasian_Journal_of_Disaster_and_Trauma_Studies_Wildfire_risk_awareness_perception_and_preparedness_in_the_urban_fringe_in_AotearoaNew_Zealand_Public_responses_to_the_2017_Port_Hills_wildfire

¹⁸ *Two Rural/Urban Interface fires in the Wellington suburb of Karori: assessment of associated burning conditions and fire control strategies*, L.G. Fogerty, FRI Bulletin No 197, 1996: <https://scion.contentdm.oclc.org/digital/collection/p20044coll13/id/18/>

¹⁹ *A Flammability Guide for Some Common New Zealand Native Tree and Shrub Species*, New Zealand Fire Service Commission Research Report Number 20, November 2001: <https://fireandemergency.nz/assets/Documents/Research-and-reports/Report-20-A-Flammability-Guide-for-Some-Common-New-Zealand-Native-Tree-and-Shrub-Species.PDF>



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research produced a list of 42 selected native species and their flammability. Of relevance to the proposal in the Draft Plan to revegetate the Strip, is the caution on page 6 of this report that native plants of low flammability may serve as “green breaks” on moist or fertile sites to reduce a crown fire in an adjacent forest or scrub fire, but under extreme conditions they will burn readily.

118. Figure 2 on the same page depicts defensible space requirements around a house in two situations. Our situation is depicted in “b” and reproduced below.

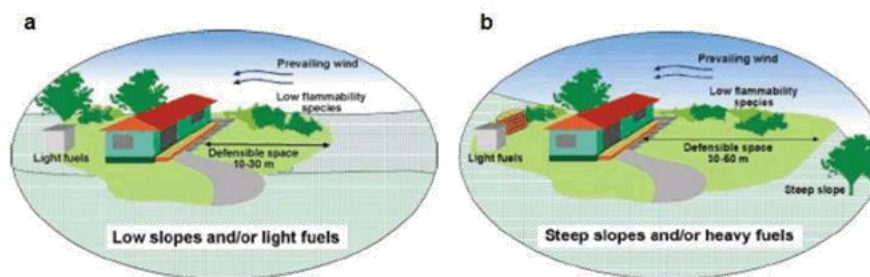


Figure 2. Defensible space requirements around a house in (a) low slopes and/or light fuels, and (b) steep slopes and/or heavy fuels.

119. Our properties are located next to potential defensible spaces directly above a very steep slope that is densely forested. In extreme conditions that forest is likely to burn. The recommended defensible space for our properties is 20 to 60 metres. The maximum width of the mowed area of the Strip is about 26 metres.
120. The effect of the policy recommendation in the Draft Plan is that Green Belt values should come before the fire protection of neighbouring residents. It is our submission that it should be the other way around. The Strip behind the houses from numbers 23 to 37 should remain as a firebreak. And the remainder of the area behind the other houses and along the track next to the perimeter fence should be maintained to remove the gorse, long grass and other highly flammable material.

Risks associated with Revegetation over maintaining a Firebreak

121. The Group note that the 2019 Draft Plan discusses revegetating the Strip. In a response to a request for official information the Council has advised the following:

There is added benefit from planting fire resistant species such as Myoporum laetum, Phormium cookianum, Griselinia littoralis, Pseudopanax spp, Fuchsia excorticata, Piper excelsum, Coprosma spp, Hebe stricta, Pittosporum spp, Melicytus ramiflorus, Aristotelia serrata. There is a list of approx. 40 species which are considered fire retardant or have low flammability that occur naturally in the Wellington area.

122. This is a misinterpretation of the scientific research on this issue.²⁰ While some native species are more flammable than some introduced species, the cited research papers all include the caution that there is no such thing as a fireproof plant. The critical factor in any wild fire is how much fuel there is available to the fire as it spreads. The existing firebreak of mown grass (and mown gorse) would leave little fuel in the path of a wild fire burning up the heavily forested slope adjacent the Strip. The authors of the third listed paper did a Power Point presentation of their findings. The relevant slide is shown in Figure 5.



So green firebreaks offer potential to help manage fire and, if natives used, improve biodiversity, but...there is no such thing as a fire-proof plant. Given the right conditions (e.g. extreme fire weather), any plant will burn.

Figure 5. Any plant will burn

123. The Council's own advice to homeowners next to fire risk areas states: "*The Wellington Region is particularly at risk from vegetation fires. Apart from the fact that the Strip is surrounded by huge areas of gorse and regenerating bush, the*

²⁰ Two Rural/Urban Interface fires in the Wellington suburb of Karori: assessment of associated burning conditions and fire control strategies, L.G. Fogerty, FRI Bulletin No 197, 1996: <https://scion.contentdm.oclc.org/digital/collection/p20044coll13/id/18/>
 A Flammability Guide for Some Common New Zealand Native Tree and Shrub Species, New Zealand Fire Service Commission Research Report Number 20, November 2001: <https://fireandemergency.nz/assets/Documents/Research-and-reports/Report-20-A-Flammability-Guide-for-Some-Common-New-Zealand-Native-Tree-and-Shrub-Species.PDF>; A quantitative assessment of shoot flammability for 60 tree and shrub species supports rankings based on expert opinion <https://researcharchive.lincoln.ac.nz/bitstream/handle/10182/6884/WF15047.pdf;sequence=1>



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*region is also being planted in thousands of hectares of pine trees. On top of that, the region has two characteristics that fuel big vegetation fires - steep hillsides and strong winds.*²¹ The Strip contains a large proportion of gorse – which is a highly flammable plant – and is at the top of a steep forested hillside within a high wind zone.

124. Should the Council re-vegetate the Strip, the vegetation would be a hazard that could cause a foreseeable risk of harm (by way of fire) to neighbouring property. This would be so even if the Strip were revegetated with “fire-resistant” species. Any revegetation would present a greater risk than what is there currently. If the residents ceased their maintenance activities (or were instructed to do by the Council), it would be a matter of weeks before the gorse grew up to the extent that it would become a significant fire hazard. It is highly unlikely that the Council would have the resources to invest in clearing gorse and carrying out other maintenance activities to the same standard as that currently being done by residents.

Potential Fire Risk Liability

125. A recent High Court case²² held that the Gisborne District Council was liable to a neighbour for a fire that began on Council reserve land. The High Court held that the Council had a duty to take reasonable care to remove or mitigate hazards on its land and which could cause a foreseeable risk of harm to a neighbouring property. In this case, the Council breached this duty, and therefore acted negligently, by failing to remove vegetation from a Council reserve that posed a fire risk. The Court awarded the neighbour \$875,254.68 in damages.
126. It did not affect the Council’s liability that the fire was deliberately lit and neither was the Court persuaded that less should be expected of the Council because the land in question was a small piece of the overall reserve land held by the Council. The Court stated “*the Council can be considered to be relatively well resourced and it has the ability to raise finance through rates and other measures. In those circumstances, and particularly where the Council was aware of the fire hazard, I do not accept that less ought to be expected of it.*”
127. Recent fires in Nelson and Wadestown, together with previous historical fires around Karori, demonstrate that fire is a real and foreseeable risk.
128. The Draft Plan states “*there will always be a risk from people causing inadvertent or deliberate fire and from lightning strike. Climate change may exacerbate the risk through likely increase in frequency and/or severity of drought conditions.*” These statements demonstrate that the Council is clearly aware of the fire hazard presented within the Outer Green Belt. The High Court has found that the Council can still be liable for a fire even if it was deliberately lit.
129. The maintenance activities being carried on the Strip by residents clearly reduce the risk of fire and therefore Council’s liability should a fire occur. Gorse has either been removed (by some residents) or is being mowed (by other

²¹ <https://wellington.govt.nz/~media/about-wellington/emergency-management/files/scrubfires.pdf?la=en>

²² Double J Smallwoods Ltd v Gisborne District Council [2017] NZAR 1167



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residents). In fact, the residents' maintenance activities are consistent with Council's own advice on managing fire risk. The Council's advice is:²³

130. *To make a defensible space, an area of 20m from the walls of your house should be:*
 - a) *Lean - minimal amounts of flammable vegetation*
 - b) *Clean - no dead vegetation or other flammable debris, and*
 - c) *Green – plants are healthy and green during the fire season*
131. As is stated earlier in this submission, many of the houses on Versailles Street are sited extremely close to their rear boundary. This means that there is little that residents can do within their own land to reduce the risk of fire. As a result, by mowing the Strip, they have ensured that the Strip contains minimal amounts of flammable vegetation and is cleared of dead vegetation and other flammable debris.
132. The Council suggests using "*low growing herbaceous (non- woody) plants that keep green during the fire season. Herbaceous plants include lawn, clover, ground covers, bedding plants, bulbs, perennial flowers and conservation grasses. Irrigate regularly.*"²⁴ Note that "lawn" is specifically mentioned. This advice is exactly what the Residents' have followed in carrying out their maintaining activities on the Strip.
133. The High Court in Gisborne specifically found that "*Had [the land] been cleared and maintained as mown or line trimmed grass, the Fire would have spread more slowly because the fuel load would have been smaller*" and would likely not have spread as far as it did. The Strip is currently cleared and maintained as mown grass – exactly the situation that the Court found would have reduced both the speed and extent of the Gisborne fire.
134. If a fire were to break out within Zealandia, and spread to our properties, then it would likely be Zealandia who would face liability for that fire. However, the Council would also have liability (and be exposed to an award of exemplary damages) if it had removed a firebreak that would have prevented (or lessened) damage to our properties.

²³ <https://wellington.govt.nz/~media/about-wellington/emergency-management/files/scrubfires.pdf?la=en>

²⁴ <https://wellington.govt.nz/~media/about-wellington/emergency-management/files/scrubfires.pdf?la=en>

Appendix C – Description of the Land

135. The land subject to this Submission is described in the Draft Plan as references 6.2.11, 6.2.4 and 6.2.3. It is in essence parts of the Karori Reservoir title left outside the Sanctuary (Zealandia) predator fence when it was built in 1999. It also includes a water reservoir. From our perspective the land has a range of different characteristics:

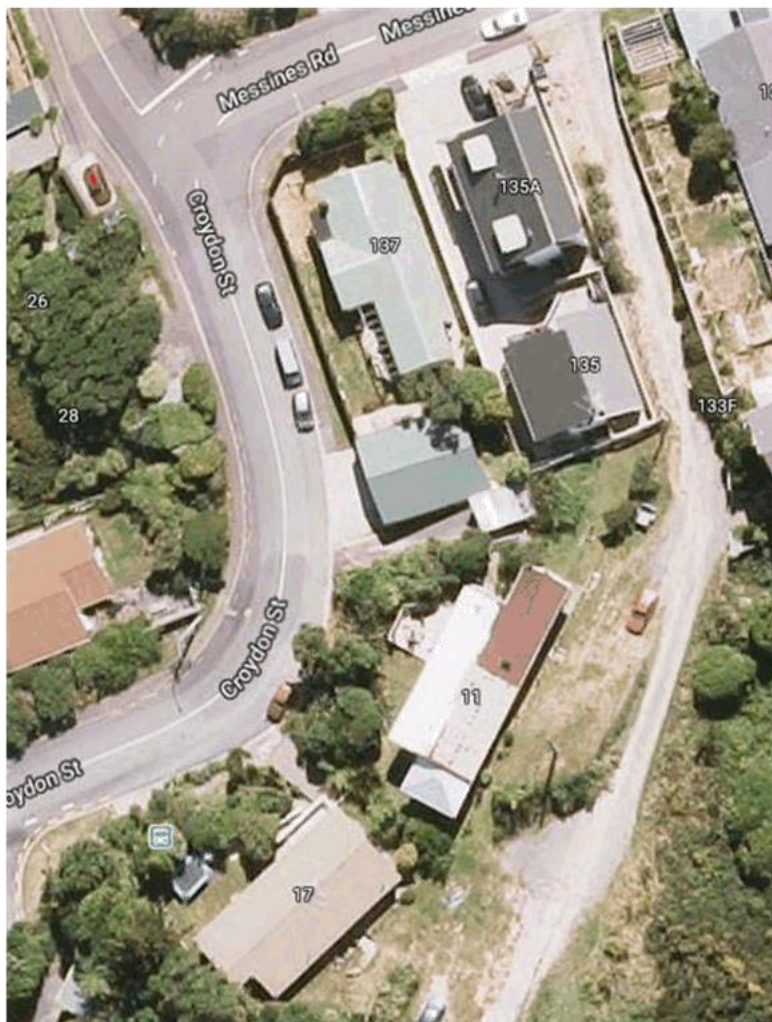
- a) There is a bush buffer that runs the length of the area. It ranges in depth from about 5 metres to approximately 40 metres in depth. The bush is regenerating. In some parts there are extensive weed infestations, particularly in the northern area of the buffer. There is also garden weed in some parts. We are prepared to commit to removing these weeds.
- b) Driveway from Messines Road constructed to service Wellington Water reservoir. 133B Messines Road was a former water services house and has a legal right of vehicular access along the driveway. The driveway is well used as a public access to the round the Zealandia fence line track. Numbers 11 and 17 Croydon Street and 3 Versailles Street use the driveway for vehicular access to the rear of their properties. This removes six vehicles from the top end of Croydon Street which is beneficial for traffic safety and movement, particularly given that it is an important bus services (numbers 21 and 37 and several school bus





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services), and is relatively narrow, has a sharp bend in its bus route. There is absolutely no history of vehicle – pedestrian conflict on this driveway.



- c) Vehicular access path (gated) to the reservoir. This is maintained periodically by Wellington Water to allow it service access. A small number of people walk to the reservoir to enjoy the view from there. The vast majority of people opt to walk to the Zealandia fence line track instead.
- d) A limited amount of land to the west of the access route backs onto numbers 5, 7, 9, 11, 15, 17 and 19 Versailles Street. Generally it is topographically separated from the access path which was obviously graded slightly below the crest of the ridge. Neighbouring property owners maintain that land to varying degrees and use it as a sitting / viewing area. Public access to those areas west of / above the access way would have a significant impact on privacy and security for several of these properties.



- e) The land behind number 21 Versailles Street slopes quite steeply down below the reservoir to a band of bush at the bottom of the slope. We understand the grass and gorse here were maintained by Parks and Gardens until recently. The resident of number 21 asked the Council to resume cutting the grass and gorse. The response was to offer to spray the gorse 2 metres out from the boundary and to re-vegetate it with "fire resistant" native shrubs. He was also told that the Council does not now and never has maintained any fire breaks. We think this is a not being a



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good neighbour and that it does not meet the requirements of the fire legislation.

- f) The land behind numbers 23,25,27,29,31,33,35 and 37 Versailles Street is generally referred to as 'The Strip'. It was created as a fire break when the Group's houses were built in the early 1960s, when the only vegetation was grass and gorse. It has been maintained by residents in that way ever since, with the explicit or implicit support of successive Councils. The 'lawn' is in fact a mix of grass and large areas of gorse carpet. There has also been some clearance of invasive weeds by the Group in the bush strip in recent years. On the downside there has also been some garden waste dumping over the years. The Strip is used mostly by children living in the street, and is also used for annual street barbeques. The only genuine encroachments on the Strip are one trampoline and a washing line. Several of the houses have large living room /bedroom windows facing the Strip within a couple of metres of it, so privacy and security are critical issues, as Council has long recognised.



- g) Between numbers 37, 39 and 41, the land drops away through an area of advanced regeneration bush. The rear boundaries of numbers 39 and 41 are at or near the inner edge of that bush. The width of the Council owned land above the track is as narrow as 4 metres here, from where it slopes down sharply to the Zealandia fence line, making any proposed track impractical.



- h) Between numbers 41 and 43 the land drops away further. The land narrows behind 43 to about 5 metres in width. The owners have removed weeds, planted and extensively beautified the area. This includes structures (spa pool and trampoline). Number 43's privacy and security would be particularly dramatically compromised by public access in this area as the house is built with large windows almost to ground level within 2 metres of their boundary.



OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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25 March 2019

Outer Green Belt Management Plan (1781014)
Wellington City Council
PO Box 2199
Wellington 6140

By email: outergreenbelt@wcc.govt.nz

Submission – Draft Outer Green Belt Management Plan 2019

1. This is a submission on the Draft Outer Green Belt Management Plan 2019 (the Draft Plan). I live at [REDACTED] Versailles Street, Karori along with my wife and twin children.
2. I support the submission of the Versailles Street Residents Group. However, I am also making this submission as an individual.
3. I would also like the opportunity to make an oral submission. I can be contacted by email [REDACTED] or mobile [REDACTED]
4. I am a regular recreational user of the Outer Green Belt and, being resident on Versailles Street, border it. I therefore support many aspects of the Draft Plan and, in particular, wish to commend the City Council on its vision. However, I am concerned about the aspects of the Draft Plan that relate to the land known as the “Versailles Street Strip” (the Strip).

Maintenance and use of the Strip

5. The residents of Versailles Street have maintained and used the Strip for almost 60 years. I have done the same since we purchased our property in February 2018. Those maintenance and use activities have provided mutual benefit. My family has been able to enjoy the Strip as a piece of open space adjoining our property and the City Council has not had to pay for maintenance activities (including mowing, weed control/removal, and pruning).
6. Maintenance and use activities were specifically endorsed and encouraged by the Wellington Regional Council when it owned the land. An agreement to that effect was in place.¹ Since the land was transferred to the Wellington City Council in the early 2000s, the City Council has been fully aware of, and has benefited from, the residents’ maintenance and use.
7. Maintenance activities have also ensured that the Strip can function as an effective fire break (which I understand was its original purpose).

Previous commitments made by the Wellington City Council

¹ See paragraphs 40-44 of the submission from the Versailles Street Residents Group

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8. As is clear from the submission of the Versailles Street Residents Group, there is an extensive history of interactions between the residents of Versailles Street and the various Councils that have owned the Strip. The City Council has made a number of commitments to residents over the years. These include:

- a. Recognising the concerns of residents on the impact of the Zealandia boundary fence on views and privacy.
- b. Ensuring that the Zealandia boundary fence line “does not impede the views from the lounges of the properties on Versailles Street adjacent to the strip.”²
- c. Giving assurances at the time the Zealandia boundary fence was constructed that (a) every effort would be made to maintain the amenity value of the Strip, and (b) every effort would be made to preserve, or if possible improve, views.³
- d. Committing to resolve “the boundary encroachment areas ... in accordance with any Regional Council commitments.”⁴ The “commitments” referred to in this resolution was an agreement under which the Regional Council permitted residents to use and maintain of the Strip and recognised that so doing meant that it did not have to control vegetation growth and therefore provided mutual benefit.⁵ Councillor Martyn Turner stated, in a letter to Councillor Andy Foster dated May 12 1998:

“From a WRC point of view, this group of residents have a very satisfactory history; taking a responsible approach to the land and in effect making the ‘strip’ maintenance free for the Council. I would like to think that the affected Versailles Street property owners could be given some assurance that the ‘strip’ will remain as it is now.”

9. These interactions and commitments should be considered and honoured by the City Council. The residents of Versailles Street, myself included, are entitled to consistency in City Council decision making.

Outer Green Belt Management Plans

10. In the 2004 Outer Green Belt Management Plan, the Council stated:

This land bordering Versailles Street has been the subject of discussion as to its best use and status. As public land purchased for sanctuary purposes by Wellington City Council, it should be protected. However, it has been maintained and used in

² Resolutions of the Wellington City Council, December 1994

³ See paragraph 89 of the submission of the Versailles Street Residents Group

⁴ Resolutions of the Wellington City Council, January 1998

⁵ Report to the Utilities Services Committee of the Wellington Regional Council, 7 March 1997 (Report No. 97.83)

OUTER GREEN BELT MANAGEMENT PLAN

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common by Versailles Street residents for many years as an open green strip bordering 10 or more houses on the eastern side of the street. The present title boundary runs very close to some of these houses and the area may not work well as a reserve without some rationalisation of this boundary and clear definition of its use and management. The land provides excellent views of the valley and should be retained for public enjoyment and as a buffer to the Sanctuary.

11. The same Plan placed an action on the Council to:

Resolve issues in consultation with adjoining residents and the Sanctuary Trust, taking account of the wider community's interest in the land.

12. Over the last 15 years, the Council has made absolutely no attempt to consult with the residents of Versailles Street regarding the Strip. Neither has it made any attempt to "resolve issues".

13. Instead, the Council now proposes, in the 2019 Draft Plan:

There are 21 encroachments of private use from adjoining residential properties with addresses on Versailles venue (sic) and Messines Road onto the Council-owned reserve land. The encroachments vary in extent and are mainly gardens, lawns and outdoor uses (such as trampolines). The private use is contrary to the purpose of the reserve land, which is for public benefit; in this case a particular role as part of the Zealandia perimeter. The Council considers that the land should be completely revegetated to strengthen the natural barrier between housing and Zealandia, although an additional option could be considered of formalising a walking track through the strip of reserve from the scout den to the reservoir access entrance on Messines Road

14. The Council's proposal is simply not consistent with Council's previous statements, previous resolutions and commitments, or the extensive history of this matter. It does not give effect to the Council's stated purpose in the Draft Plan to "promote co-operation between the Council [and] neighbours" and nor does it meet the Council's engagement principles. Moreover, it is not consistent with Council's stated intention to act in good faith and be a good neighbour.
15. There is no legal encroachment onto the Strip from 35 Versailles Street. We have, however, mowed the part of the strip that adjoins our property. This is to ensure that the Strip continues to function as an effective fire break and control the spread of gorse and other noxious weeds. As stated above, despite maintenance being the Council's responsibility, these activities have been carried out our own cost. We have not sought to pass them onto the Council or ask the Council to fulfil its maintenance obligations.
16. Revegetating the Strip would compromise its function as a fire break and significantly increase the liability of Council should a fire ever break out on it or within Zealandia. As stated in the Versailles Street Residents Group submission, recent case law makes it clear that the Council would bear significant liability should it revegetate the Strip and a fire break out which damages our property. Given the

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undeniable effects and implications of climate change, and the strong winds that characterise the location, fire is a real and foreseeable risk. In those circumstances, it would be prudent risk management for the Strip to remain in its current state.

17. A walking track through the Strip is unnecessary given the proximity of the walking track around the Zealandia boundary fence. It is possible to provide access from the reservoir access entrance on Messines Road to the scout hall by utilising the existing perimeter track. A walking track through the Strip would simply duplicate what is already there and unreasonably interfere with the privacy and security of residents. Council has previously accepted the importance of these things when it agreed that the Zealandia boundary fence would not run through the Strip.

18. I therefore wish to support the submission of the Versailles Street Residents Group that:

- a. Provisions in the Draft Plan relating to the Versailles Street Strip revert to the wording currently in the 2004 Plan.
- b. The City Council, Zealandia and residents acknowledge the extensive history of this matter and seek to resolve the ongoing use and maintenance of the Versailles Street Strip by residents and the public in a mutually acceptable manner.
- c. The Council acknowledges the need to maintain the existing firebreak.
- d. The Council reconfirm its previous commitments to protect the privacy, security and views of residents.
- e. Until the ongoing use is resolved, the Versailles Street Strip not be reclassified as reserve.

19. I am keen to resolve the issues in good faith and I encourage the City Council to partner with the Versailles Street Residents Group to do so. By acting together, we can achieve an outcome that is better for both parties than if the Draft Plan is confirmed.

20. Some potential options for doing this (all of which provide benefit to the City Council above and beyond that in the Draft Plan) have been identified in the submission from the Versailles Street Residents Group. I support these options.

Yours sincerely



Simon Johnson

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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2019 Outer Green Belt Management Plan Submission

Submitter: Stephen Watson as Trustee on behalf of Long Gully Station Trust.

My intention is to keep this submission brief so our comments and concerns can be easily understood and we trust addressed by planners within the final Plan.
We also wish to be heard orally at the proposed plan's hearing where we will add weight to this submission and answer any questions that Councillors/Commissioners may have.

Submission:

1/ We strongly object and will oppose any reclassification of Hawkins Hill Road (our ROW) or part thereof to be included within the boundaries of the proposed Te Kopahau Scenic Reserve.

We would however, support the classification of the Scenic Reserve where its boundary is up to the surveyed road and Hawkins Hill Road be classified as Public Road.

We strongly advocate for Hawkins Hill Road's management to rightfully come under the Wellington City Council "Transport and Infrastructure"

Explanation:

Calls by ourselves over many years for the Hawkins Hill Road Right of Way to be classified as a public road so it can be maintained as such has fallen on deaf ears. WCC Parks and Gardens have proved to be extremely poor managers of the road, having neither the budget, expertise, or will to upgrade and maintain the road to anything close to a safe carriageway for the ever increasing general public use nor does it have the foresight to future proof the asset by understanding fully the current and future capacity required. Any reserve clarification of the road would only add another level of bureaucracy and in the case of "scenic reserve" requiring Ministerial approval for any major works within the reserve.

We would ask that if Hawkins Hill Road and the Brooklyn Wind turbine is further developed as "A main entrance" as this plan proposes that the road is upgraded accordingly in consultation with ROW owners.

We have no confidence in Parks and Gardens ongoing management of the road and we have experienced many years of its poor management to support our concerns.

We have owned Long Gully Station for 26 years and continue to own most of the privately owned land adjoining Hawkins Hill Road to the West and exclusively own the Southernmost 4 kilometres of the Hawkins Hill road.

As a neighbour of significance to the future of Te Kopahou we would have thought Council would have at the least asked us for a copy of our Long Gully Station Management Plan to understand what we are working to achieve over the next 25 years. As neighbours we are expected to keep abreast of Council's ever changing plans whilst Council's army of planners add layer upon layer of rules to their plans with no effort having been made by WCC to understand our goals and whether or not we can't work together to achieve mutually beneficial outcomes.

The Council's conscious neglect of the maintenance and upgrade of Hawkins Hill Road over the 26 year period we have owned Long Gully Station whilst opening the previously private road to the general public and actively promoting the road for ever increasing recreational use has been a festering point of contention with the residents who in most cases rely on Hawkins Hill Road as their main access route to the CBD.

2/ We strongly object to and will oppose any reclassification of Te Kopahou where that classification negatively impacts on our long term plan to provide land and houses for the beneficiaries of our family Trust off Hawkins Hill Road.

Explanation: We already have to contend with the ill conceived and implemented Hill Top and Ridgeline Policy that was an indiscriminate, lazy desktop overlay that negatively impacts our private land and that we should have appealed to the Environment Court.

We applaud the proposed plan's focus on managing exclusively Council owned land and excluding adjoining private land.

3/ We strongly support the plan's intention to review the management of the coastal road around the South coast.

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Explanation:

As Long Gully Station Trust owns 2.5 kilometres of Cook Strait coastal frontage bounded by the coast road we witness daily the illegal paua poaching and the abuse of the escarpment by joyriding 4x4s and motorbikes. Signage has been repeatedly shot at and ripped out of the ground by continuous vandalism.

Proposal:

We propose a move from the current policy of only one day exclusively for walkers and cyclists and 6 days for motor vehicles, to 6 days exclusively for walkers and cyclists and only one day (Saturday) for motor vehicles.

Further we also strongly oppose Council's continued costly reinstatement of the coast road after every significant southerly storm. It seems a no brainer to reduce traffic around the coast that the coast be allowed to restore itself by the natural actions of the sea and the road not be mechanically rebuilt each time. Four wheel drives will always still make their way around but in a lot lesser numbers and the cost and practicality of road reinstatement will become more prohibitive with passage of time and the ongoing undeniable sea level rise.

4/ Streams...Explanation: The greatest threat to Long Gully Station's drinking water is not silt but poisoned animal carcasses therefore under Policies and Actions 4.2.2.2 add

8. Ensure best practice for use of toxins in or near water catchments to ensure toxin or poisoned animal carcasses do not enter waterways by strictly observing DOC recommended buffer zones for the use of toxins.

9. Prohibit the use of inhumane 1080 and Brodifacoum within Te Kopahau that allow animals to wander and die on neighbour's properties.

10. Prohibit the aerial dropping of any toxin within Te Kopahou

11. Adopt best practice of choosing trapping in preference to toxin for pest management within Te Kopahou.

5/ Weeds...We support the Council's prioritisation to prevent Darwins Barberry taking hold in Te Kopahou. We are disappointed with the complacency of previous Councils that made no attempt to contain Darwins Barberry whilst it was confined to our north within Wrights Hill Reserve and did nothing to prevent its infestation into Long Gully Station. Further Council should volunteer to undertake control for its neighbours of Darwins Barberry if it is giving more than lip service to the problem now.



**DRAFT OUTER GREEN
BELT MANAGEMENT PLAN**

Submission to the
Wellington City Council

Prepared by Tim & Katie Christie
43 Versailles St, Karori



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24 March 2019

Dear Councillors,

We are residents of 43 Versailles St, Karori.

We purchased the property in 2011. We were drawn to this site specifically for its location, including sun, peacefulness, privacy, security, views, proximity to nature and fire safety. We were particularly enamoured by the design, elevation and orientation of the house on the section in relation to these natural assets.

We bought the property knowing it was adjacent to council land, but also with the comfort that it was within 10 meters of an existing public track strategically positioned to meet the needs of Zealandia, public and residents. We paid a premium at the time in what was a very competitive tender process. We have recently also completed an expensive alteration to make the most of the inherent assets particular to this site.

We were very surprised to learn about the new proposals for the strip of neighbouring land as part of the OGBMP. Whilst we understand and appreciate the overall objectives of the plan, we, our neighbours and members of the public we have talked with believe they present completely adverse outcomes for everyone in the context of this site.

Revegetating within meters of our house for us personally would have a huge negative effect on all the aforementioned assets we were drawn to initially and currently enjoy. In addition, this would also severely heighten the risk of fire damage due to being directly beside our home and emerging from a steep ridge-line. Further, public access would place users and residents into uncomfortably close proximity, presenting awkward and unwanted interactions for all, not to mention significantly compromised privacy and security. There is also a very real and significant devaluation effect arising from all of this if the plan was implemented. Understandably this is causing us considerable concern and distress.

The existing track within 10 meters of our home already enables walkers, bikers and runners to enjoy a peaceful wilderness experience away from urbanisation. It's position mitigates a number of potential issues relating to the proximity and elevation of our dwelling to what is a very narrow strip of land. We urge you to sensibly factor these particular issues into the planning of this area.

In the following pages we discuss all our concerns in greater depth. We have also prepared detailed imagery to make everything as clear as possible. We urge you to seriously consider the issues we raise and the serious implications they present for us as a family. We also wish to be heard when the Council takes oral submissions.

Regards



Tim & Katie Christie
43 Versailles St, Karori

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Privacy and security

There are two factors relating specifically to the strip of land neighbouring our property that presents **significant privacy and security implications** if this area was made publicly accessible.

1. Proximity

The land beside No. 43 is at its **narrowest point in the whole street** and the most constrained section also happens to coincide with the heart of our inside/outside living areas. At this point the strip is only **4 metres wide**, after which there is a council-installed safety fence, followed by a steep drop and then the Zealandia perimeter fence track. The Versailles St strip is over 20 meters wide in other places.

From a planning perspective this specific area is incredibly constrained and public access here would force users and us, as residents, into extremely close proximity. This would create adverse experiences for everyone. The public would find themselves walking directly beside a private dwelling with views into open plan living areas, bathrooms and bedrooms and exposed to everyday domestic noises. We would lose all privacy and security and effectively be living in a public park.

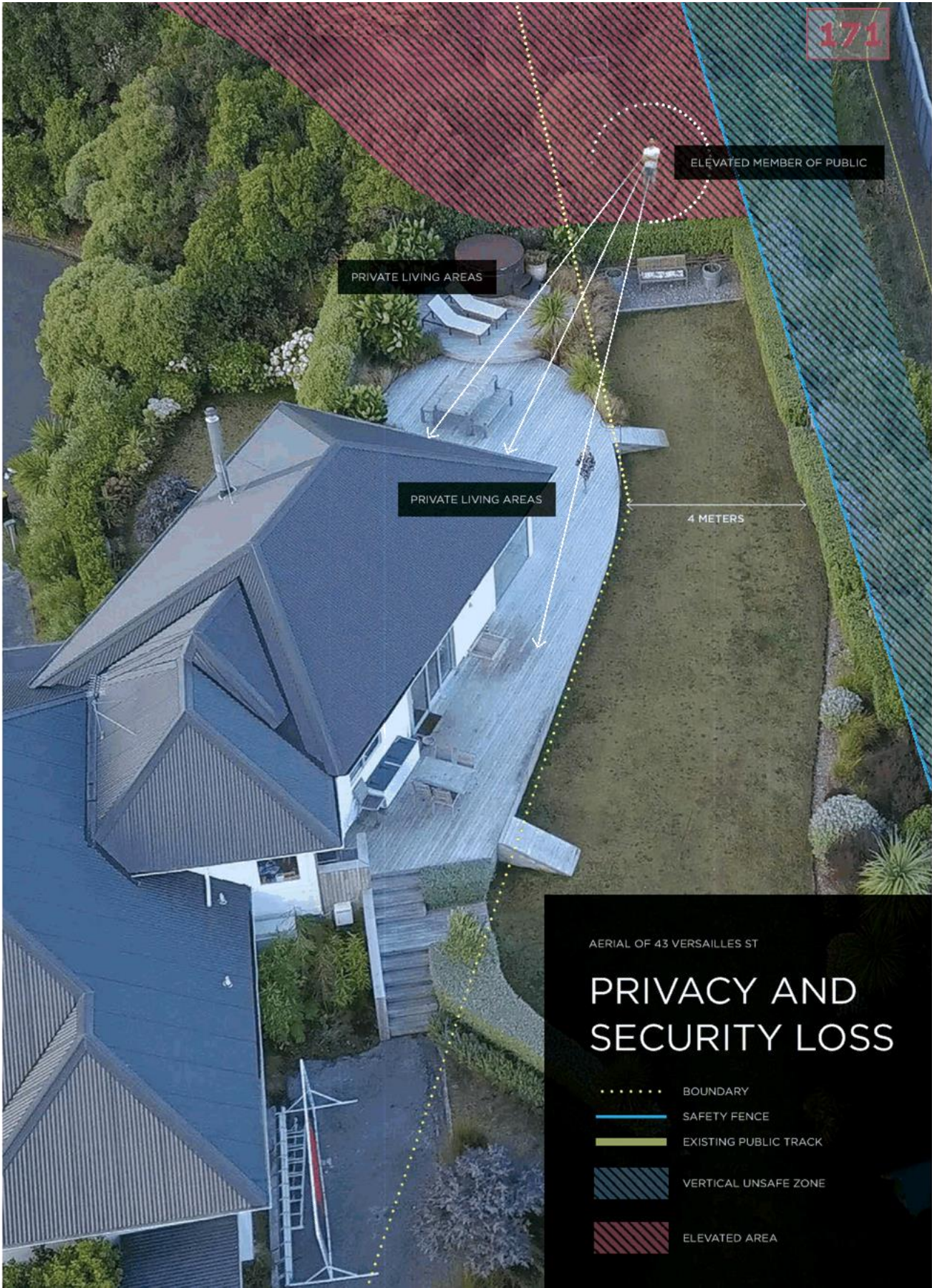
2. Elevation

Our house sits just below a natural rise in the land at the northern edge of the property. Access at this point would mean people coming down the hill would have a **direct and elevated line of sight into the living areas of our home**. This would be undesirable for public and residents alike. It would totally compromise the privacy and security of our home and present an unusually invasive and undesirable experience for track users. Even a two metre high barrier would provide insufficient protection at this point and any measures to counter this problem would also contribute to sun and view loss. Any form of privacy/security barrier would completely undermine the decision to place the current perimeter track below properties.¹

Off Road Trails

The primary purpose of an off-road trail is to escape urbanisation and to soak up nature. We are outdoor enthusiasts and enjoy using council and DoC tracks all the time. As a runner I have explored almost every bush, stream, hill and mountain in the Wellington region. The best off-road tracks are the ones that immerse you in nature and the experience is greatly diminished when they come close to urbanisation and this would be the case if a public track was built within a couple of metres of our home.

We strongly oppose making this area publicly accessible as it would be creating a completely unnecessary and totally unsatisfactory experience for everyone.







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The existing track

The existing track adjacent to the Zealandia perimeter fence was intentionally and strategically positioned as a result of consultation with residents in the 1990s¹. Due to necessary ongoing weed and plant control this track is constantly maintained for the biosecurity of Zealandia. This means it is always serviceable for bikers, walkers and runners.

It provides an important off-road link between Birdwood Reserve and Wrights Hill Scenic Reserve, from which you can link to tracks that will take you all the way to the South Coast.

This track already comes within 10 meters of houses but due to the sloping topography it does not compromise the views, sun, privacy, security and peace for residents. For track users, despite being in relatively close proximity to urbanisation, the experience is entirely nature focused and peaceful. Takahe and other wildlife can be observed up close through the fence. Users are insulated from domestic noises and the sight of houses and residents.

To create another track within metres of this existing track would undermine a solution that already sensitively resolves the needs of residents, public and Zealandia. In doing so it would place home owners and the public into close proximity creating unsatisfactory experiences for everyone. Due to the constrained nature of this piece of land in particular, the public would be unavoidably forced to within a meter or two of our home.

We oppose the idea of making the strip publicly accessible when an exiting solution is already in place that elegantly satisfies everyones needs.







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Sun and view loss

No.43 was positioned on the boundary at the most elevated and eastern point of the section. The living spaces including kitchen, dining and lounge are all on the upper level and designed and orientated towards the views and sun. All the indoor/outdoor living is at this point in the property. The original joinery, which has been recently upgraded, is intentionally full height to take advantage of the expansive vistas and provide thermal advantages. Vegetation over time would completely undermine the design and primary assets of this house. This would become one of the main contributing factors to a significant drop in the value of our property which we discuss later in our submission.

EXISTING SOUTH/EAST VIEW FROM THE HOUSE

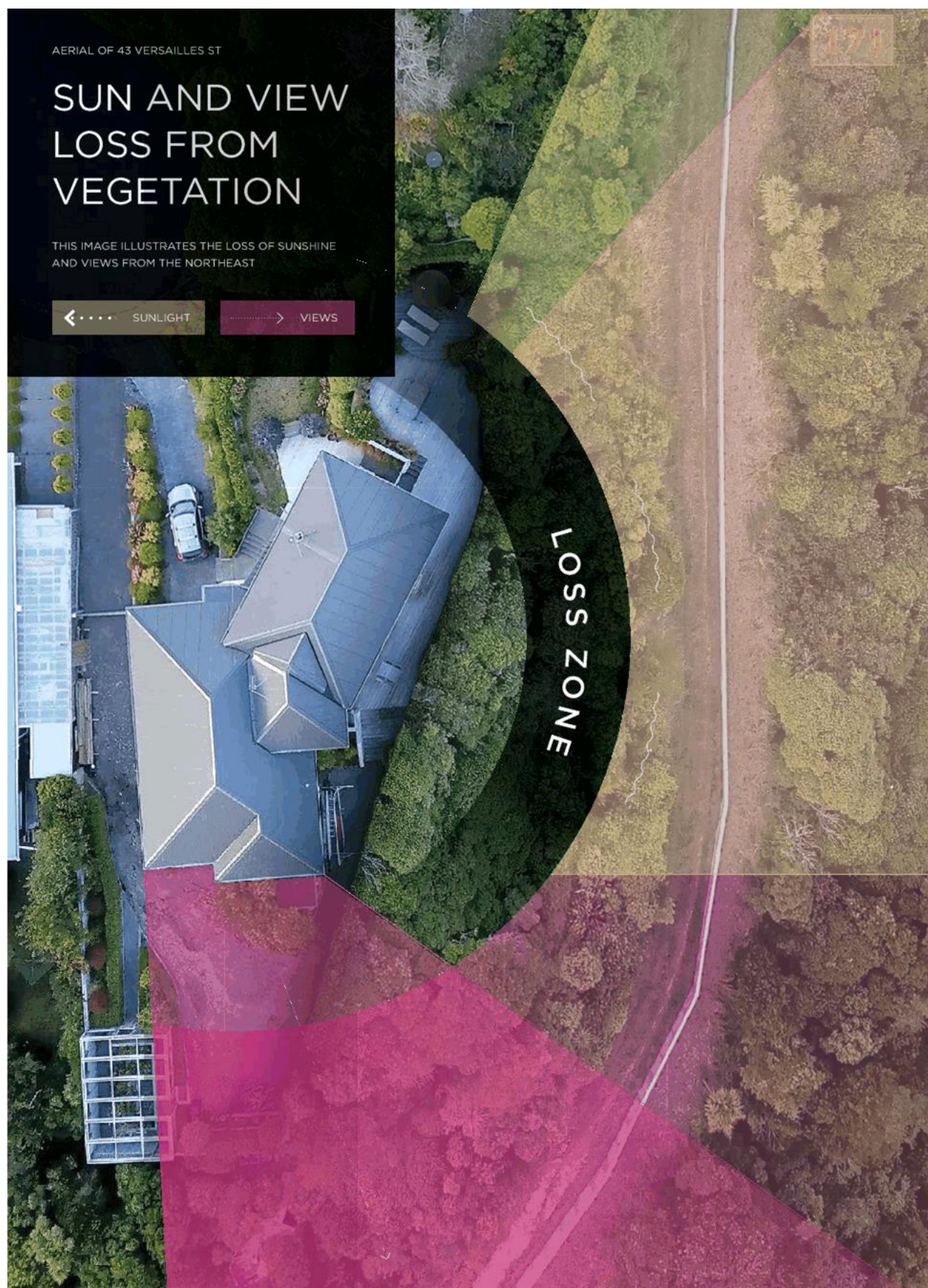


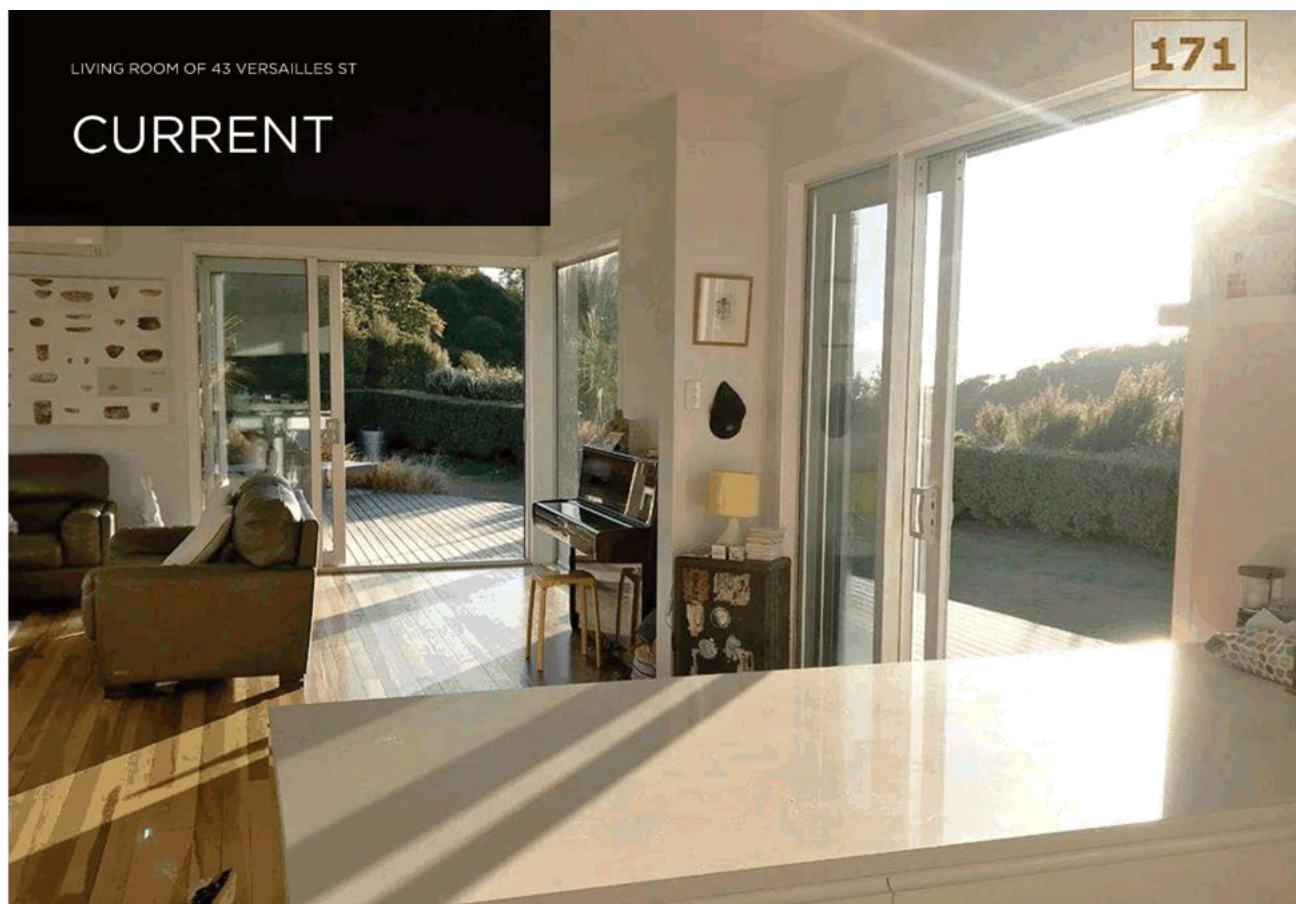
SAME ASPECT WITH MATURE VEGETATION











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Fire risk

The Strip was originally established as a firebreak and it continues to be maintained as such as open space by the residents today. The Strip has gone through a succession of owners over the years and is currently owned by Wellington City Council (the City Council) and is zoned as a conservation site. The ongoing use of the Strip as a fire break can be supported by the policies relating to management of fire risk.

History is very relevant in respect of fire. In the early to mid-1990s Karori in particular, and some surrounding suburbs were hit repeatedly by arson. Sometimes several times a week, or even a day, fires were being lit in the bush around our community. The sound of fire engines attending fires was obviously just as frequent. It prompted a local councillor to establish Wellington's first Community Patrol. The Police eventually identified the suspected arsonist, but there was never adequate information to charge them. Ongoing revegetation has seen gorse replaced by less flammable plants which has also assisted. It is important though to note that some native vegetation is also quite flammable.

Suffice to say, fire is a real issue for Karori. Because our property is on the crest of a ridge-line fire becomes a bigger issue. When the fire break was created, gorse would have been the dominant plant over large areas of the hillside below us. While gorse has been largely removed, exacerbating fire risk would be an issue, and Council would have obligations under legislation to address that issue.

We have had recent history of the massive fires near Nelson this month (February), and the small fire in bush on Te Ahumairangi Hill. In February 2017's Port hills fires, 2075 hectares of land were burned and 11 houses destroyed or badly damaged. The fire was only declared officially out after 66 days. Climate change and drier summers will make this more of an issue.

Fire risks are discussed in part 4.2.2.6 on page 43 of the Draft plan. Fire risks are to be managed by:

- "rules in the Rules section;
- planting fire-resistant species in areas of high fire risk;
- informing the public about fire risks and how to avoid causing fires via on-site signs and other visitor information;
- co-ordinating fire management with Fire and Emergency New Zealand."

The explanation given is:

"Fire has the potential to set back ecosystem restoration. The frequency of fires has decreased in recent years, largely because of regenerating indigenous vegetation supplanting flammable gorse, but there will always be a risk from people causing inadvertent or deliberate fire and from lightning strike. Climate change may exacerbate the risk through likely increase in frequency and/or severity of drought conditions."

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While fire can “set back ecosystem restoration” it can also put properties and people living in them at the boundaries of the outer green belt at risk, a factor not mentioned in the plan. While there is a mention of the adverse effects of climate change, there is no indication that anything is being done to mitigate the “likely increase in frequency and/or severity of drought conditions”.

The 2017 Port Hills fire and the 2019 fire in the Nelson region have raised the awareness of wildfires on the fringes of urban areas. This new awareness and a lack of adequate preparation were the subject of an editorial in the Dominion Post on 7 February. The editorial referred to a paper by fire scientists that concluded with the warning that councils have a key role in ensuring adequate planning takes place to prepare for such disasters before they happen.

The Outer Green Belt has not been immune to wild fires. In the 1993/93 fire season two separate wildfires threatened houses on what is now Montgomery Avenue. The situation of those houses is very similar to the situation of our house – sited at the top of a ridge with Karori on one side and a very steep hill covered in trees and shrubs on the other. There was even a water reservoir near the houses. Residents were asked to evacuate their houses and it was with great difficulty and some risk that the houses were saved.

On page 11 of the report, in discussing the risk fire fighters exposed themselves to, it is stated that where fuels are continuous, very extreme fires will breach firebreaks with relative ease. It then makes an estimate of how wide a firebreak is needed and suggested a “rule of thumb” of 1.5 times the flame length. In a later paper by the same author applied findings from his continuing research to produce a list of flammability of 42 selected native species. Of relevance to the proposal in the OGBMP to plant native trees adjacent to our properties as a buffer to Zealandia is the caution on page 6 of the report that native plants of low flammability may serve as “green breaks” on moist or fertile sites to reduce a crown fire in an adjacent forest or scrub fire, **but under extreme conditions they will burn readily.**

The effect of the policy recommendation in the draft OGBMP is that Green Belt values should come before the fire protection of neighbouring residents. It is our submission that it should be the other way around. The Strip behind the house should remain as a firebreak. And the remainder of the area behind the other houses and along the track next to the perimeter fence should be maintained to remove the gorse, long grass and other highly flammable material.

The strip of grass adjacent to our home, whilst not wide enough to meet recommended optimal fire safety thresholds on a ridge-line, does provide a crucial protection zone that would have a far greater mitigating effect on a wild fire than native vegetation. We strongly urge you to consider our safety and property protection against what is a very real and increasing threat.

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Financial implications

Aside from the lifestyle, privacy and security impacts of revegetation and public access there is also a very real property value implication that would arise from changes to the neighbouring strip of land.

Our property, like many on the street, was designed, positioned and orientated specifically to take advantage of the natural surrounds, sun, view and isolation. Additionally, the existing firebreak provides peace of mind and protection from a large area of forest. We presently enjoy a sufficient level of privacy and security without the need for obstructive fencing.¹

A property's value always relates to a combination of factors and when factors change, positively or negatively, value is affected.

We have consulted with a number of property specialists to ascertain just what effect the potential changes to this land would have on the value of our property. The uncertainty we are now experiencing is already having a detrimental effect on current market value. Experts also unanimously agree that, like many of the properties on the street, the proposed changes would have a significant negative effect on the value of No. 43.

If privacy, security, sun, view and fire safety were compromised then this would correspond to a drop of 15% to 20% in property value. This represents a market value loss of between \$220,000 - \$290,000.

If changes to the neighbouring land were to proceed then we would be formally seeking compensation for the loss sustained and a fair adjustment to our Council rates. Further we would be seeking compensation for all the planting and maintenance of the strip since our tenure.



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Kaitiaki / Guardianship

When we moved into the property 7 years ago we found that the Council was not involved in any maintenance of the lawns or surrounding areas. It was evident that since carving out the bank and installing the safety fence above Zealandia nothing had been done to look after the land. The land had been left to go wild and was covered in thick weed including gorse, broom and blackberry. We felt obligated to better manage the land and decided to clean up the area. This was a significant amount of work and expense which took a period of 5 years. We carried out these botanical enhancements³ with knowledge and support of the Council who supplied us with some new native plants. We supplied most of the shrubs at our own expense, planting a diversity of native species including a variety of flaxes, grasses, akeake, corokia, manuka, kanuka, pitisporum, aleria, tarata, kowhai, kakabeak, ti kouka, puka and ngaio.

We estimate we have planted over 250 plants in this area. We have been maintaining these plants and controlling weeds ever since. As a result we have beautified and enhanced the biodiversity of the site, adding to the buffer zone of Zealandia. We have particularly enjoyed watching bird life flourish in this extended habitat.

Having observed countless other Council areas that have become neglected and over-run with weeds, including an area at the top of the strip by the water tower, we have little confidence in the Council of managing this land effectively and any where near to the level we currently maintain it. We believe it is in the best interests of the public and the residents to have a MOU in place to allow residents to continue to look after the land. Failing that, we believe land purchase in the context of this site is an obvious solution.



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The way forward

We are seeking a MOU or land purchase opportunity (with caveats) which we feel would be the only way to provide assurances for our future.

Our submission is that:

- The City Council, Zealandia and our group acknowledge the extensive history of this matter and the legitimate present-day concerns we outline in this submission. We are open to working together to resolve the ongoing use and maintenance of the Versailles Street Strip in a mutually acceptable manner. This could be in the form of an MOU or land purchase agreement.
- Until the ongoing use is resolved, the Versailles Street Strip not be reclassified as reserve.

MOU

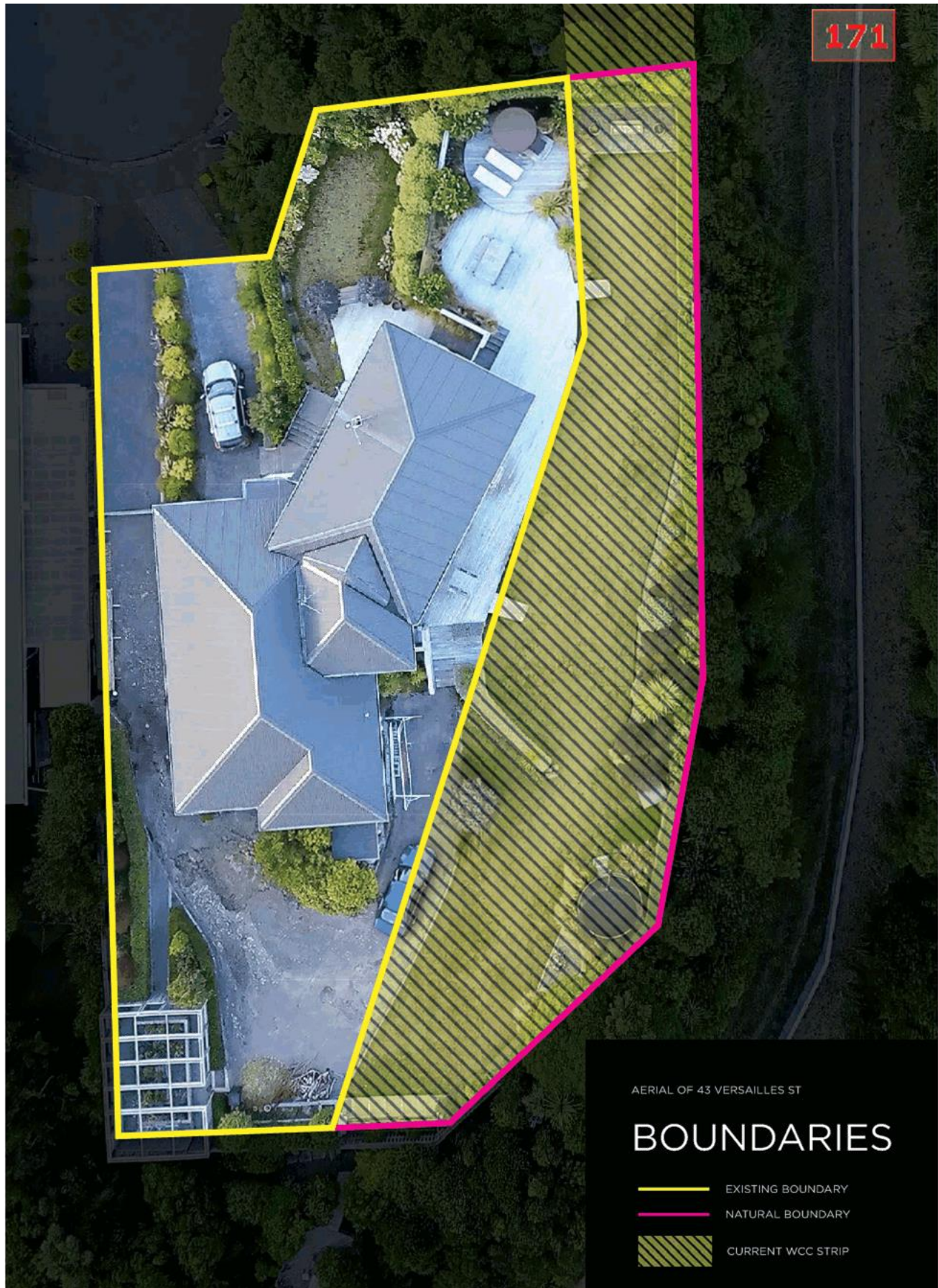
We are seeking a mutually acceptable formalised agreement that acknowledges the unique characteristics of the Versailles St Strip and provides future certainty for all parties.

Land purchase

Because the Strip was considered surplus to the needs of the Trust, the City Council has previously offered to sell a 5-metre wide portion extending outwardly from property boundaries. The land transfer from the Regional Council to the City Council took five years to be completed, and unfortunately the option to purchase lapsed.²

We know from our discussions with various Council Officers that the private purchase of council land occurs. Our property represents a unique situation whereby a transfer of this nature is an obvious solution for Council and us. Specifically;

1. The adjoining public land is more topographically and visually connected to our property than the steep bank and perimeter track below. There is an obvious natural flow between our property and the adjacent land.
2. Because there is no way public access could be introduced in a sensitive manner that respects the needs of residents and public alike it makes sense for this thin slice of land to not have to be managed by Council.
3. Private ownership is a proven way to ensure sound guardianship. We have already demonstrated a positive influence on the land with significant botanical enhancements³, biodiversity and habitat increase and ongoing maintenance and care.
4. Land purchase has already been extended to residents in the past and would have been uptaken had the transfer happened faster.²



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Our details



Name: Tim and Katie Christie

Email addresses: [REDACTED]

Telephone Numbers: [REDACTED]

Postal address: 43 Versailles Street, Karori, Wellington 6012

Capacity: We are making this submission as individuals.

Oral Submission: We would like to make an oral submission to the Councillors.



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Footnotes and references

Existing fence and track location

¹ From 1994 to 1999 there were negotiations with neighbouring residents, the Wellington Regional Council, the Wellington City Council and the Karori Sanctuary Trust. The outcome was that the predator proof fence was sited down the hill from and next to a buffer of native trees above the track between the Strip and the fence to meet the security and privacy concerns of residents.

Land purchase opportunity

² Because the Strip was considered surplus to the needs of the Trust, the City Council offered to sell a 5-metre wide portion extending outwardly from our boundaries with a six-month option date. This land purchase offer took place in the 1990's when the land was being transferred from the Regional Council to the City Council but because the transfer took five years to be completed, the option lapsed.

Botanical enhancements

³ On pages 86-87 of the 2019 Draft Plan there is a section entitled "Botanical Enhancements". The relevant paragraph 7 reads: *"Botanical enhancements" are small areas of land that are maintained and/or enhanced by a neighbour through planting or vegetation management in keeping with the open space values and character. These are managed by way of a "letter of understanding", which must be obtained by anyone who has or promises to undertake "botanical enhancement". For the purposes of managing encroachments, botanical enhancements are not considered encroachments and therefore are not by default prohibited.*

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

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First Name:

Tom

Last Name: *

Adams

Organisation:

Western Suburbs Trail Alliance

On behalf of:

Postal Address:

Suburb:

Northland

City:

Wellington

Country:

New Zealand

PostCode:

6012

eMail: *

Preferred method of contact

☒ Email☐ Postal

Daytime Phone:

Mobile:

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

If possible I would like to bring a couple of illustrative slides / images to be shown if a projector is available.

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1. Do you agree that the Vision statement on the front of the [Summary Document](#) or in [Part 2 of the draft plan \(starts page 12\)](#) captures what is special about the Outer Green Belt Reserves?

- ☒ Yes
☐ No
☐ Don't know

If not, why not?

2. Looking at the [Summary Document](#) section 'What is the Outer Green Belt?' or at [Part 2.3 \(starts page 13\)](#) and [Part 3 \(starts page 16\)](#) of the draft plan, do you agree with:

	Yes	No	Don't know
The Guiding Principles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Key Values	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Looking at the plan highlights in the [Summary Document](#), do you think these will help achieve the Vision that *the Outer Green Belt...*

	Yes	No	Don't know
is Wellington's wild green connector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
visibly defines the edge of the city	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects and connects nature	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
invites people to escape and explore	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Why/why not?

Why? Because it is a very comprehensive list! Crucial to that is monitoring - we can plan and administer the OGB better if we have better data.

4. Looking at [Parts 3.6 \(starts page 30\)](#), [3.7 \(starts page 31\)](#) and [4.6 \(starts page 65\)](#) of the draft plan and thinking about the areas of the Outer Green Belt that you know about or visit, is there anything missing that you think should be added to make sure the Outer Green Belt reserves help the city and the people who live here thrive as the city grows and changes in the future?

- ☐ Yes
☒ No
☐ Don't know

What do you think could be added?

5. Completing a track that goes all the way from the south coast through to Porirua in the north (the Skyline Track) is identified in the plan as the main priority for track development in the next 10 years ([refer to part 4.5 of](#)

OUTER GREEN BELT MANAGEMENT PLAN HEARING SUBCOMMITTEE 17 APRIL 2019

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the draft plan - starts page 52). Do you agree that this should be the main priority?

- ☒ Yes
☐ No
☐ Don't know

The second priority in the plan for track development is to ensure all suburbs at the edge of the Outer Green Belt have good loop tracks from residential areas up into the Outer Green Belt and out again (refer to Part 4.5.2.3 - starts page 54). [Click here for maps showing the proposed track networks.](#)

6. Does the proposed track network achieve a good even spread of opportunities that will allow a wide range of people to enjoy and experience the Outer Green Belt?

	Yes	No	Don't know
Sector 1	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 2	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 3	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 4	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 5	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 6	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sector 7	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here any comments about the proposed loop tracks and accessibility to the Outer Green Belt.

7. Accessing the Outer Green Belt often involves a steep climb up before getting to flatter tracks along the ridgelines. Please add below any ideas for solutions not included in the plan that would allow for greater accessibility to the Outer Green Belt by a wide range of people.

Is there anything missing that would help?

The draft plan proposes trialling different ways to manage grass areas – particularly the areas on the tops of the hills. This will include taking sheep and cattle out of the reserve areas. There are pros and cons to taking grazing animals out of the Outer Green Belt, for example:

Pros

- Tracks won't get damaged by cattle in winter
- People won't be afraid of cattle
- Fencing costs will be less
- Areas of regenerating native bush won't get damaged

Cons

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- Areas won't look as rural
- Grass will grow longer and weeds and regenerative native vegetation will have to be kept clear by other means to maintain the existing character and views
- People won't be able to see farm animals

8. Do you support the draft plan proposal to phase out grazing animals?

- ☐ Yes
☒ No
☐ Don't know

Why/why not? What ideas do you have to balance out the pros and cons?

On the exposed ridges the native vegetation will take a very long time to return, if at all. Up until then we will have a lot more gorse and barberry to deal with. It's not a big issue, and there are pros and cons, but for me the cons outweigh the pros. Also, presumably there is a revenue from leasing the area for grazing?

9. The draft plan proposes that there will be ten 'main entrances' to the Outer Green Belt. There are five existing ones and five new ones ([refer to the map of the entrances on page 60 of the draft plan](#)). Each area will be designed to include parking, toilets, information boards with maps and drinking water supply. They are all slightly different but on average they will cost approximately \$250,000 each.

	Yes	No	Don't know
Do you support this proposal?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Do you think it will encourage more people to use the Outer Green Belt reserves?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please rank the proposed new entrances in order you think we should complete them. The new entrances are planned for the Brooklyn wind turbine; Wrights Hill; Chartwell Bush/woolshed; 268 Ohariu Valley Road or McLintock Street; and Ohariu Valley Road or Upper Stebbings Valley.

10. When you think about living in Wellington in 10 or 20 years' time, will the management and development of the Outer Green Belt as described in this plan help make the city a good place to live?

- ☒ Yes
☐ No
☐ Don't know

Part 6 of the draft plan describes the character and values of the Outer Green Belt and contains objectives, policies and actions in seven areas ('Sectors'). The Outer Green Belt reserves are so large that this enables people to think about specific parts, while also considering the management of all of the areas as a connected whole.

The Summary Document lists the key actions for each sector (shown on the Map Page), sector descriptions.

11. [Sector 1 \(Te Ngahere-o-Tawa/Redwood\)](#) is the northernmost part of the Outer Green Belt, extending from

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the Porirua City boundary along the ridge above Linden, Tawa and Redwood.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

12. **Sector 2 (Ohariu Ridge)** runs along Ohariu Ridge above Churton Park and out to Old Coach Road above Johnsonville. Currently there are big gaps in the connected reserves here.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

13. **Sector 3 (Kaukau)** extends from Old Coach Road above Johnsonville to the Chartwell Spur above Crofton Downs. It is also the backdrop to Broadmeadows, Khandallah and Ngaio.

	Yes	No	Don't know
Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support community partnership in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Does the draft plan support use of this sector by a wide range of people?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Will the plan ensure the natural environment continues to be protected and improved in this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with the actions for this sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add here anything relevant to this sector that you think is not covered in the plan.

14. **Sector 4 (Chartwell/Karori Park)** extends from Chartwell Spur above Crofton Downs through to the Makara Road along Te Wharangi ridge via the Kilmister Tops and Johnston Hill above Karori.

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Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☒ ☐ ☐

Does the draft plan support community partnership in this sector?

☒ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☒ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

Do you agree with the actions for this sector?

☒ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

15. **Sector 5 is Makara Peak.** This sector includes the mountain bike park.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☒ ☐ ☐

Does the draft plan support community partnership in this sector?

☒ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☒ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☒ ☐ ☐

Do you agree with the actions for this sector?

☒ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

16. **Sector 6 (Wrights Hill/Zealandia)** extends from South Karori Road, across Wrights Hill and the valley of Zealandia.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in this particular area?

☐ ☐ ☐

Does the draft plan support community partnership in this sector?

☐ ☐ ☐

Does the draft plan support use of this sector by a wide range of people?

☐ ☐ ☐

Will the plan ensure the natural environment continues to be protected and improved in this sector?

☐ ☐ ☐

Do you agree with the actions for this sector?

☐ ☐ ☐

Please add here anything relevant to this sector that you think is not covered in the plan.

17. **Sector 7 (Te Kopahou)** extends from Zealandia along the main ridgeline, taking in the Brooklyn wind turbine, Hawkins Hill and Te Kopahou before descending all the way down to the South Coast.

Yes No Don't know

Does the sector overview capture what is unique about the area and properly guide management of what is special and valuable in

☐ ☐ ☐

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this particular area?

Does the draft plan support community partnership in this sector?

Does the draft plan support use of this sector by a wide range of people?

Will the plan ensure the natural environment continues to be protected and improved in this sector?

Do you agree with the actions for this sector?



Please add here anything relevant to this sector that you think is not covered in the plan.

18. Do you have any comments on the [proposed reserve classifications in the draft plan](#)? Please provide the name and/or legal description of the reserve and your comments.

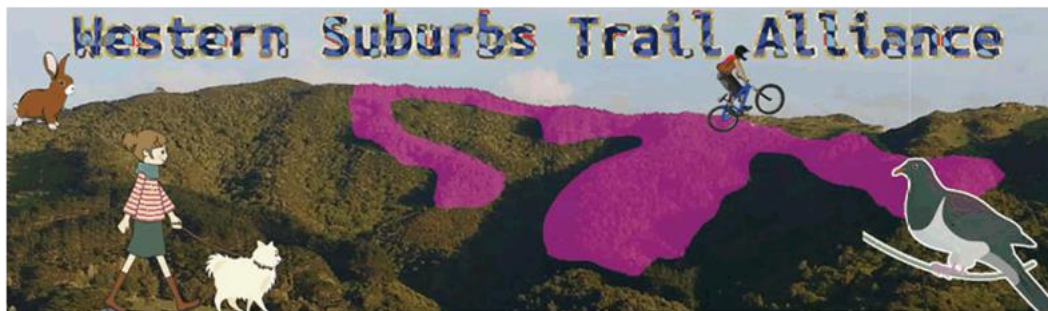
19. Please add here any other comments or suggestions you have in regard to the Outer Green Belt Management Plan.

Please see supporting document

Attached Documents

File
OGBMPsubmissionFinal
Outer Green Belt Management Plan 2019

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Summary

Western Suburbs Trail Alliance (WSTA) is a subset of Wellington Mountain Bike Club (WMTBC), and endorse their submission, along with Brooklyn Trail Builders and Welly Tracks.

The WSTA:

- Endorse the draft Outer Green Belt Management Plan
- Welcome the diversity of users of the OGB, and is happy to note the growth of mountain biking recognised in the Plan
- Note the need for mountain bike tracks of a range of skill levels also recognised in the plan.
- Agree that the proposed tracks in the Johnston Hill area are an excellent way to achieve this, and fit well into the existing shared-use network in that area.
- Furthermore, the proposed tracks will reduce possible user-conflict on the Cemetery-Skyline track, creating more recreation opportunities in a safer environment.
- Are keen to provide volunteers to improve the ecology of the area through trapping and native planting.
- Welcome the opportunity for public consultation, but feels that should consultation be successful the timing of construction could be expedited from 5-10 years.

Introduction

Wellington is a diverse city, and a better place for it. It is diverse in its ecology and economy, and in its cultures and activities. This diversity brings resilience and opportunity, along with vibrancy and future-proofing. This is a large part of why so many of us choose to call Wellington home.

In the Outer Green Belt Management Plan (OGBMP) over twenty permitted recreational activities are listed, from drone flying to rock climbing, from tramping to e-biking. It is this range of diverse activities that give Wellington's population an outlet, improving their health and well-being, as well as enhancing their awareness of our natural environment.

This – along with the mandate to safeguard the landscape and native ecology - is surmised in the Plan as:

“The over-riding issue is how to balance providing for different user groups and experiential preferences with the need to ensure that development of the track network does not compromise the other open space values and reasons why people want to recreate in the Outer Green Belt.”

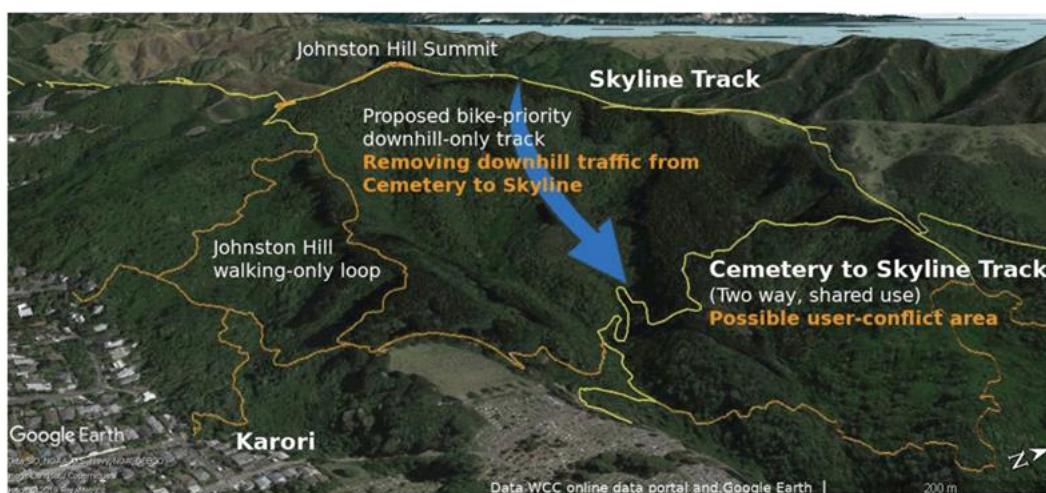
We believe that the draft plan achieves this goal admirably. We also endorse section 4.7.2 which discusses a monitoring plan, so that decisions can be made on objective evidence-based data. We

believe that through increased data collection, by means of surveys and track counters, the diversity of users of the OGB will become even more apparent. To this end, we would like to provide more details on one aspect of the Plan, the proposed mountain bike tracks in the pine plantation area of Johnston Hill.

Johnston Hill Mountain Bike Tracks

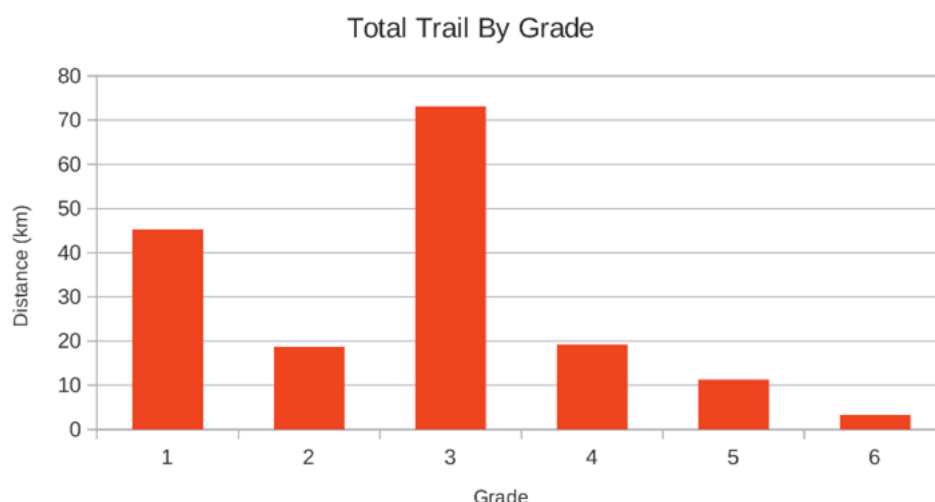
The OGBMP looks to enhance and complete the Skyline track, which will increase both bike and foot traffic on it. Additionally, visitor numbers to the OGB are increasing, particularly mountain bikers. The Cemetery to Skyline shared use track, pictured below, is an important connector between the Skyline track and Karori and the Western Suburbs. Currently two-way and multi-use, it is likely that sooner or later the combination of downhill bike traffic and walkers may lead to conflict. Just as in Polhill reserve, the addition of a downhill-only bike option is a necessary way to future-proof this network for future conflict. Unlike in Polhill reserve, this downhill connection can be made in plantation pine forest of negligible ecological value. For this reason alone, the inclusion of proposed mountain bike tracks on Johnston Hill is an excellent addition to the Plan.

Map 1 – 3D view showing how proposed tracks remove potential user-conflict



Additionally, the Plan makes several mentions of the “demand for more technical grade 5 tracks”, but this is never qualified. This demand has been known by WCC for several years, and featured in many discussions with WMTBC. A key driver for this demand is the recent loss of access to the privately-owned Long Gully Station for bikers, home to most of the city’s higher grade tracks. The following chart shows the current total length of mountain bike trails in the Wellington region by grade (source, Trailforks.com). Out of 171km only 14km are of grade 5 or higher. There is an overwhelming dominance of grade 3, which is great for beginner mountain bikers, but leaves them few places to go as they progress. WCC has done a great job of encouraging people onto their bikes and into the wild, but there also needs to be a range of tracks for them as they progress. The proposed tracks on Johnston Hill are a great example of how this can be achieved in a way that preserves the ecology, the diversity and the experience of the OGB for all, while posing virtually no financial burden on the council.

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Some critics of the diversification of the OGB may question whether mountain bikers already have ‘enough tracks’. This is answered by one of the five guiding principles of the OGBMP, which states that the diversity of landscape is a strength of the area. This acknowledges that one of the major attractions is the range of ecology and topography, and this attraction is felt by all user-groups. Where compliant with the general track network policies it is reasonable to assume that mountain bikers would like to experience a range of grades, locations and environments as much as any other users. To corral all of Wellington’s mountain biking into a single area of homogeneous grade 3 trails would degrade the experience and seriously reduce participation.

WCC are well aware of the shortage of grade 5 tracks, and it has been the subject of many discussions between WCC and WMTBC over the last few years since the loss of access to Long Gully. It is important to note that the Makara Peak Master Plan does not contain any provision for any new Grade 5 trails in that area.

In 2017 WCC came to WMTBC asking for suggestions of possible locations for higher grade tracks. By January 2018 Wellington Mountain Bike Club submitted to Wellington City Council a proposal for mountain bike tracks in the pine plantation on Johnston Hill (Appendix I), a location which fulfilled the general track network policies of the OGBMP. This location was deemed ideal because:

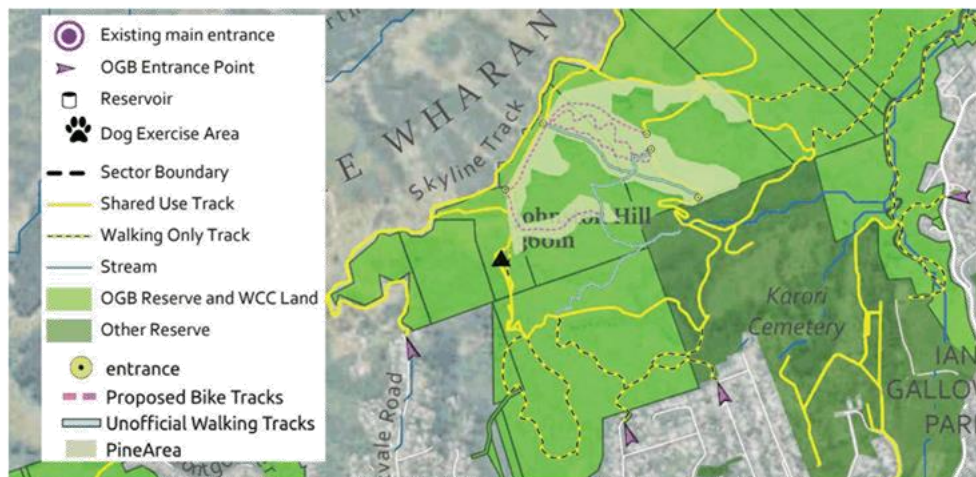
- Potential for user conflict is reduced from the status quo:
 - The area already contains a large number of shared-use trails, and adding bike-only downhill options will remove traffic from them. There is a walking-only loop which is unaffected. Overall, the area is very low use, and the proposed tracks do not cross any walking trails.
- No negative environmental impacts
 - All trails are in a plantation pine forest, with minimal ecological value. No streams will be disturbed. No trees will need to be felled, and the forest canopy will be unchanged. There is minimal understorey. The style of trail will be narrow and low impact (i.e. not large wide tracks)
- Ecological restoration
 - WMTBC are willing and able to provide additional volunteers for trapping and native planting in this area as part of the agreement.
- Connectivity

- This area is directly accessed off of the Skyline track, a major connector within the OGB, and creates additional loops connecting to Makara Peak, Karori Park and Wrights Hill.
- Diversity
 - These trails would be a unique addition to the network, as there are no other instances of trails in this kind of forest in Wellington, with this mix of ground and rock terrain. The area is ideal for Grade 5 trails, filling a significant hole in the existing network.
- Community engagement
 - There are a large number of bikers in the area, allowing the project to tap into significant volunteer labour for construction, but also trapping and environmental monitoring.
- Economic benefits for Wellington
 - The Makara Peak Master Plan discusses “Wellington’s aspirations for increased national status as a high quality mountain bike destination”, while the OGBMP discusses direct and indirect economic benefits from the OGB. This is achieved by enhancing and diversifying the range of tracks, driving more revenue from visitors, but also encouraging more people to settle and to call Wellington home.

Integration into existing network

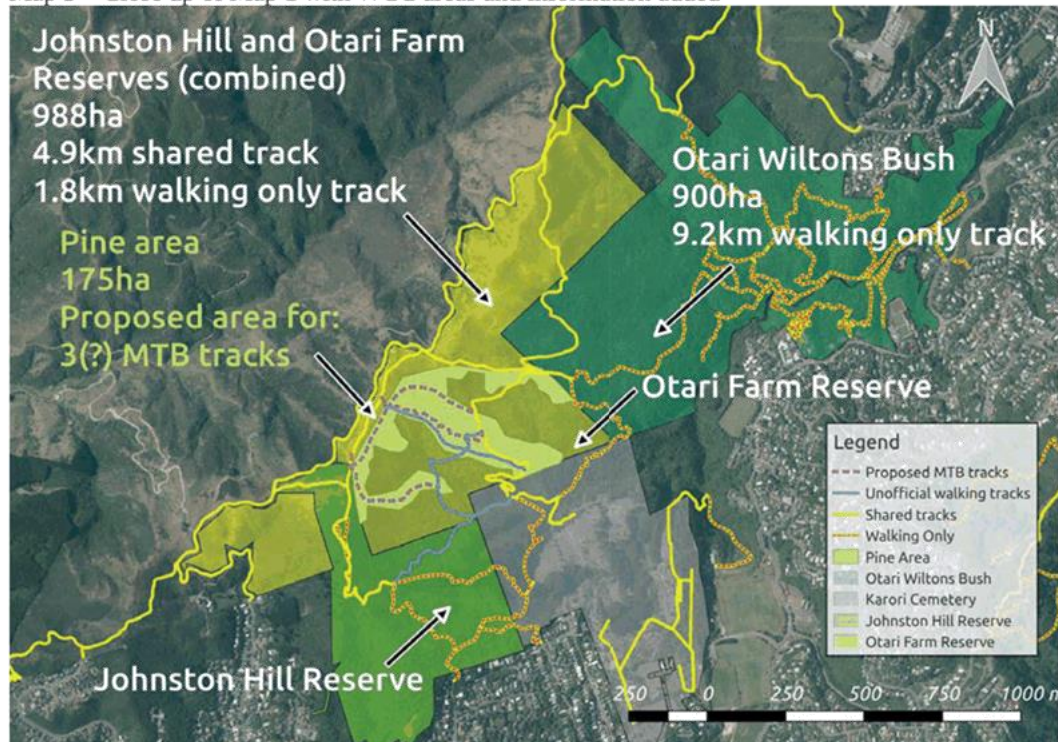
The maps below show the existing network of nearby walking and shared use trails, along with the data provided in the January 2019 WMTBC proposal. The maps show the pine area and proposed bike trails, as well as existing unofficial walking tracks, which the proposal recommends upgrading into official shared tracks. It is apparent that the proposal makes good use of the existing shared trail network, and will not impinge on any existing walking-only trails. There is ample space for walkers who prefer not to be in the vicinity of other user-groups, with a safe and integrated network of shared and bike-only trails for others. Existing trails will not change in character, only status.

Map 2 - Sector 4 map as per draft OGBMP, WMTBC proposal overlaid



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Map 3 – Close up of Map 1 with WCC areas and information added



Using volunteer labour from WMTBC, the existing climbing trail ‘Cemetery to Skyline’ could also be improved, with two steep, tight corners altered to provide easier access for all users. Looking further afield, these trails connect immediately with the Skyline track. This creates many more possible loops from Karori integrating with Wrights Hill, Makara Peak and Karori Park, and also provide options from all of the Western Suburbs extending through to Johnsonville and Mt Kaukau.

Western Suburbs Trail Alliance

The Western Suburbs Trail Alliance is a facebook group of 127 members, set up under the auspices of the Wellington Mountain Bike Club to advocate for the development of mountain bike tracks in the pine plantation area of Johnston Hill. We endorse WCC’s proposal to start public consultation on these tracks, and welcome the findings of that report. Once this is complete, we question the stated 5 to 10 years for construction, as our readily available volunteer labour and low cost to WCC mean we can start right away once proper planning and consultation is completed.

Overall, we commend WCC on their forward-thinking planning, and look forward to working with them in the Johnston Hill area.

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Appendix I – Proposal submitted to WCC January 2018

Executive Summary

The Wellington Mountain Bike Club (WMTBC) acknowledges that there is a demand for grade 5/5+ mountain bike tracks in Wellington that is not being fully met. This proposal provides a plan for a set of high-grade trails in a pine block on Johnston Hill, an area of the outer green belt that is ecologically low-value, currently has little use, has excellent user separation, and connects well with the existing track network. These tracks will be unique to Wellington City, as there are currently no other grade 5 trails in a high-density pine plantation, and could compare favourably to tracks in Rotorua, Nelson and Queenstown. A plan to construct and maintain these tracks by WMTBC is also provided. WMTBC can provide volunteers to extend the existing trapping programme in the forest.

Objectives

This proposal aims to:

- Work towards fulfilling the demand for grade 5 tracks in Wellington
- Create tracks that are unique among the existing trail network
- Reduce user conflict by creating tracks in an area of low use and low ecological value
- Have minimal impact on other users, and minimal track intersections
- Provide tracks in an area that is close to the CBD, and connect well to the existing track network
- Compliment the existing network
- Reduce unsanctioned track construction by providing the chance to both ride and build grade 5 trails.

Justification

Pine plantations in New Zealand are widely regarded as having lower ecological value than native habitats (*Norton and Miller, 2000*), and as a consequence offer a lower recreational value to walkers, as evidenced by the comparative scarcity of walking tracks in pine plantations, even when publicly owned. However mountain bikers seem less concerned with the ecological deficits of a monoculture, and many of New Zealand's best known mountain bike locations are in pine plantations (Ben Lomond hill in Queenstown accessed by the Skyline gondola, Whakarewarewa forest in Rotorua, Woodhill Forest in Auckland, Maitai Valley in Nelson, Eskdale forest in Napier to name a few). Creating mountain bike tracks in pine plantations is thus an effective method to segregate users and reduce potential conflict without detriment to user experience.

Wellington has a demand for grade 5/5+ trails that is currently not fully met. This is shown in the problem of unsanctioned trail building, which has grown along with the popularity of mountain biking, although is an issue that has existed for decades. All unsanctioned trails in Wellington have been of grade 5/5+ level, showing that there is a high demand for those grades. There are however already a few sanctioned grade 5/5+ trails in Wellington, at Makara Peak, Wright's Hill, Mt Victoria and Karori Park. To ensure uptake, any new grade 5/5+ trails need to be distinct from these. There are currently no grade 5 trails in high density plantation pine in Wellington, so this proposal provides a fresh style of trail, which provides diversity among the existing alternatives. Other tracks in pine – namely Mt Victoria and Karori Park – are in much older, lower stocked pine. In these lower stocked forests there is more understorey, a different ecology and also a different rider experience.

The suggested location on Johnston Hill is in a pine plantation block, which is mature but unpruned. It has been thinned approximately ten years ago, and according to council sources is not expected to be harvested in the near future. This makes it ideal for grade 5 mountain bike tracks, which are low cost to build and maintain. In the event that the hillside is harvested, despite an unfortunate loss of tracks there will be no significant monetary loss to WMTBC or to WCC.

Ecological considerations

The attached map shows that any newly constructed tracks will be within pine forest. This forest is mature, but unpruned. There is negligible understorey, and ecological value is minimal. Although some lower branches will need to be pruned from some pine trees, no operations would fell trees or negatively affect their timber. There is a small intermittent creek that runs close to proposed track 3, which will require care if the tracks crosses it. No other water bodies exist in the proposal area.

Close to this area is Otari Wilton's bush. All tracks remain on the uphill side of the Cemetery to Skyline track, away from Otari Wilton, so no deviations are possible that would encroach on the reserve. A good selection of tracks in the area would remove any demand to illegally access Otari Wilton's walking tracks, most of which have many steps and are unappealing for bikers.

The proximity to Otari Wilton also means that increasing volunteer trapping efforts on Johnston Hill could have benefits to the ecology in the wider region, including Otari Wilton. WMTBC can provide volunteers to extend the existing trapping effort on Johnston Hill.

Integration into existing track network

These proposed tracks fit well with each other for short loops. The Cemetery to Skyline track provides a good uphill, and connection via Skyline to Karori Park and Makara Peak, and to Crofton Downs and Mt Kaukau in the other direction. The proposal can be viewed as a small area that can be ridden on its own, or as an option off of a longer ride incorporating Skyline.

The proposal allows for two entrance points from the Johnston Hill walking track, and two exit points on to the Cemetery to Skyline track. An unofficial walking track will also be crossed by one track. This small number of track crossings can be constructed in a way that reduces exit speed and is safe for all users. Otherwise the downhill tracks have no other intersections.

Another unofficial walking track follows a ridge up the hill (Ridgeline Track on map). After the Cemetery to Skyline track, this is the second most walked track in the forest (although users are still very low). This proposal keeps downhill bike traffic off of this ridge track. Currently there are some unofficial bike tracks that use this ridge track, and a jump that crosses it, but any elements of these that become official tracks will be realigned to keep the ridge track walkers only. Some mountain bikers may choose to push their bikes up the Ridgeline Track instead of riding up Cemetery to Skyline (the Ridgeline track is too steep to ride). As the mountain bikers would in effect be walkers at this point this is not expected to be an issue.

Segregation of users

Currently a small number of walkers use the Cemetery to Skyline track, and a very small number of walkers use the Ridgeline track. A much larger number of walkers use the Skyline track. This proposal reduces downhill bike traffic on Cemetery to Skyline by providing alternatives, and keeps all downhill biking off of the Ridgeline track. The new tracks will be located in a pine area that receives virtually no walkers, and intersection points will be safely built.

Construction

Some unsanctioned tracks already exist. Elements of these may be used in the proposal, but much can be reconstructed to new alignments and to a higher quality. Volunteer labour will be sought by WMTBC, which preliminary advice and the existence of unsanctioned trails suggests is substantial. Material costs can be met by WMTBC. The cost to the council will be only that incurred through inspection and authorisation.

Maintenance

Maintenance will be taken care of by local volunteers, arranged by WMTBC. If these volunteers should no longer be able to fulfil this role, WMTBC will endeavour to find replacements. In the event that no volunteers can be found, WMTBC can coordinate trail removal with WCC.

Trail removal

In the extremely unlikely event that the trails are not used, or are not maintained and become unusable, WMTBC and WCC can agree to remove the trails. This entails removal of any signs, infrastructure and features, and closing of trails by blocking entrances with branches and dead trees. Details of the trails will be removed from trail databases (e.g. Trailforks and tracks.org.nz). Within a year or two pine needles will have covered the remains of the trails, rendering them invisible. WMTBC see this as extremely unlikely however.

Track Details

Access to Johnston Hill is governed by the Open Spaces Access plan (September 2016), and the loop tracks are denoted as 'closed to mountain bikes'. No mention is currently given to the Cemetery to Skyline track, which is dual use. The Open Spaces Plan will need to be modified, with allowances for the tracks detailed in this proposal.

This proposal entails:

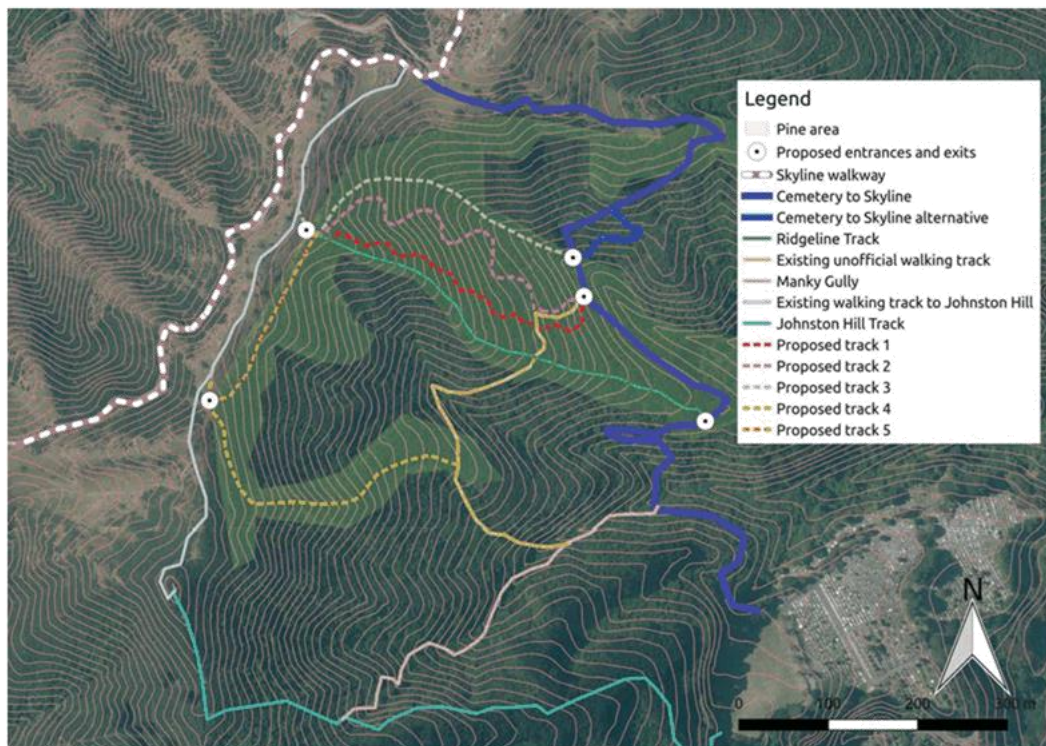
- 1) Permitting uphill cycling on the existing Johnston Hill track, and the existing walking track from Cemetery to Skyline up to the track entrances.
- 2) Permitting downhill cycling on 'Manky Gully', allowing a grade 5 descent.
- 3) Adjusting tight corners on Cemetery to Skyline alternative to be rideable up and down.
- 4) Permitting cycling on existing unofficial walking track (see map)
- 5) Constructing 5 new tracks. Elements of existing trails could be used. Exact lines to be determined by marking and inspection, if permitted. However all lines can stay within the pine area.
 - Proposal 1 - A flowy pine track, grade 4+/5
 - Proposal 2 - A more technical off-camber track using rock features, grade 5
 - Proposal 3 - A new track that uses a new exit point, but makes use of rocky terrain in a dried-out river bed. Grade 5+.
 - Proposal 4 - A line in another part of the pines, featuring larger jumps and steeper terrain. Grade 5+
 - Proposal 5 - A connecting track between the two entrance points (downhill only), to extend the length of the runs. Grade 4+/5

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Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

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Map

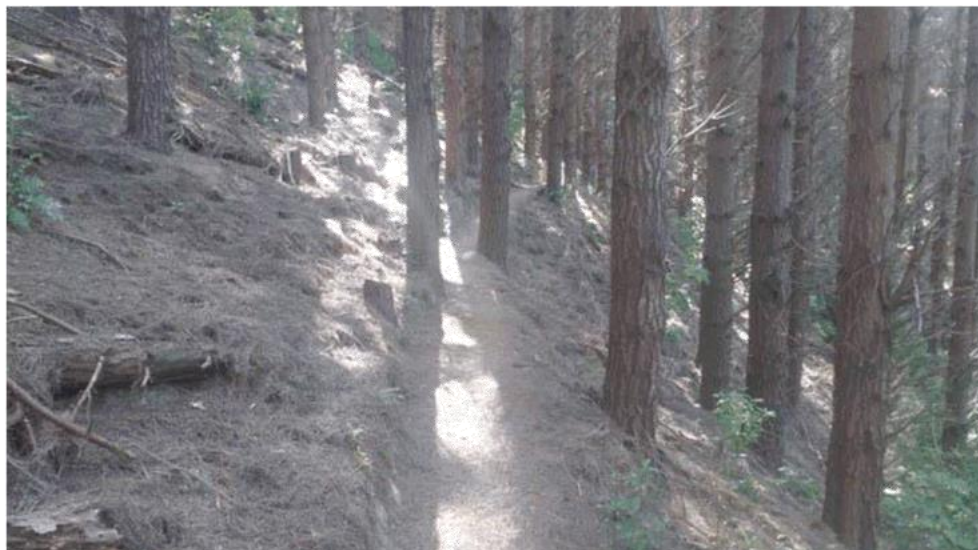


Tracks from GPS.

Contours Wellington city 5m contours 2004, from <https://koordinates.com/layer/1475-wellington-city-5m-contours-2004/>
Aerial imagery Wellington rural 2012-2013 from <https://data.linz.govt.nz/layer/51870-wellington-03m-rural-aerial-photos-2012-2013/>

Images

1) View of high-density pines from Cemetery to Skyline track, showing lack of understorey, and also contrasting environment to older, lower stocked plantations such as Mt Victoria or Karori Park.



2) Proposed main exit point



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3) Proposed main entrance point



4) Johnston Hill walking track



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5) Mix of rock and leaf litter creates a good surface for grade 5 tracks



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Summary

These proposed tracks will add diversity to the Wellington track network, access an under-utilised area and help satisfy a demand for grade 5 trails. The site has been selected due to low ecological value, low walking usage, but high suitability to mountain biking. The trails can be created at low to no cost to WCC, and WMTBC can source volunteers to construct and maintain the trails, as well as providing volunteers to extend the existing trapping programme in the forest.

References

Norton DA, Miller CJ 2000. Some issues and options for the conservation of native biodiversity in rural New Zealand. *Ecological Management and Restoration* 1: 29–37.

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Outer Green Belt Management Plan Submission from

V L Chapple

Ngaio

WELLINGTON 6035

ph

email:

20 March 2019

I am making this submission on my own behalf and I am happy to speak to it.

Although I am commenting on the paper generally, specifically my comments relate to Sector 3 Mt Kaukau

I have walked recreationally in Khandallah Park/Mt Kaukau for years, several times a week and have submitted twice previously on Outer Green Belt Management Plans. The plans just keep getting better and better, and I thought this was a well-written, comprehensive and sensitive document, with one major exception around the cattle – see later in this paper.

I completely support

- adding land to the outer green belt and classifying it as scenic reserve
- keeping man-made infrastructure to a minimum
- the focus first on protecting existing landscapes, especially a 20 metre vegetation buffer around streams

I am comfortable enough with Section 4.3.2.1 No 6 *'provide for exotic tree species to be planted where appropriate' provided* there is public input into the specific species to be planted first. I am very uncomfortable with the plan to plant exotic eucalyptus species trees. Admittedly there are hundreds of varieties of eucalypts but generally they are known as “the widow-makers” for a reason. In Wellington's windy environment this is an invitation to disaster. Also their high flammability is an issue when thinking about climate change.

I completely oppose the removal of the cattle from the skyline for the following reasons:

- The cattle enrich the outdoor experience (and this applies to the horses at Crofton Downs too) For many green belt users the cattle represent their only opportunity to encounter such livestock. Since there have been a number of negative interactions with the animals it becomes obvious that park users need educating about how to behave around farm animals. Instead of seeing this as an opportunity to enrich the outdoor experience WCC seems committed to removing the risk. As far as I am aware there is no signage anywhere to instruct people on animal management. Instead WCC has jumped immediately to the anti-risk position of removing the cattle. Since there are very few “cattle walks” to be had in Wellington this point of difference should be encouraged not removed. Keeping the cattle on the tops is also a nod to the historical use of this land.

- The cattle provide a cheap and continuous method of keeping the tops open, the openness being

a premise which underpins this Plan.

We have cause to be grateful to the farmers who thanks to their livestock management practices over the last century have kept the tops open so that we can enjoy the wide spaces and the open vistas that make visiting Kaukau so “exhilarating” 6.3.1. You only have to look at the nearby Kordia land to see what happens when pasture is no longer maintained. Prickly Darwin's Barberry grows into dense tree-like formations that I find difficult to believe will foster native seedlings, when it's own seedling production is so vigorous. The idea that “mechanical methods” -I think that is code for herbicide spraying – and biological controls will work without enormous sums of money and commitment to ongoing resources over time seems very naive.

Kaukau was covered in native growth before the Europeans arrived and if not tended the same thing will happen again (which if we didn't want the views wouldn't matter). The idea that the climate is so harsh up on the tops so that very little will grow defies the experience of many hill country farmers in NZ. We are talking hill country here, not high country. Phrases such as *“It is expected that the grass cover will grow taller after grazing is phased out but will not necessarily be overtaken by woody growth due to the extreme conditions.....taller grass growth.....should shade out a lot of unwanted seedling growth”* seems akin to the bus fiasco to me, where the intent didn't measure up to the reality.

About halfway up from Khandallah Park on the most popular route to Kaukau is an open grassed area with a picnic table. It is an open space place to catch your breath on the upward climb. For decades this area has been mowed – initially regularly and in the last few years spasmodically (arguably a funding issue). Currently it is reverting to 'rank grass,' bracken and gorse so the picnic like grassed amenity is being lost. This reversion would be happening a lot faster if it wasn't for a member or two of the community hand weeding the area to keep the gorse down. The expense of hand weeding isn't an option for the tops so it makes sense to leave the cattle to do this job. Sheep graze more intensively lower to the ground, which in turn can damage pasture on marginal land, so fewer units are usually stocked, meaning that a larger area is needed to be farmed for the same financial return. It is unusual that non- farmers are making decisions about the financial viability of the farming practices, by determining the type of farming that can occur.

The concept of keeping the ridgelines and below open grassland by mechanical methods and herbicide spraying is labour intensive, expensive and certainly not “green”. The idea that Wellingtonians want their outdoor experience laced with herbicide is absurd. (Today I met a man who was sprayed on the tops the last time this went on – he wasn't very happy.) A reasonable area below the immediate tops needs to be pasture as well, as the foliage grows upwards. There are no longer the views available from the Hemi Matangi Track in Waikanae because the trees have grown.

- That the cattle removal proposal and the trials of the alternative open top management practices are to happen concurrently is inherently flawed.

Equally worrying is the idea that grazing removal will be trialed on an “as you go” basis. 43.2.2 No 2 (d) *set up monitoring of changes in the grassland areas as a research project to inform decisions about how best to maintain the desired areas of open grassland*” is only laudable if you do it on a specified area prior to pulling out the grazing animals in the remaining area. To set the tops up as an ongoing experiment, when we already know the results of current pasture management is poor science. We already have the Zealandia perch experiment as an example of how the theory didn't meet the reality – dead waterways. We don't want the tops to be another example of science that seemed like a good idea at the time but didn't work out so well.

Much more sensible to do a real trial, locking off some of the tops for 20 years and then assess what you have done/might do. Since the quality of the research often depends on the quality of the testing and monitoring it is crucial that the funding for this is properly resourced.

Further, I do NOT support

- the proposal to put toilets on Kaukau

Toilets require maintenance which will fuel pressure to form a 4-wheel drive track. I object to this too. Once a 4 wheel drive track goes in there will be pressure from off-road clubs to access this land and completely change the experience for everyone else, after all it's their public space too. There are toilets in Khandallah Park (35 minutes downhill). Much better to put toilets at the road end at Crofton Downs, with increased parking. There are many entrances to Belmont Farm Park and very few toilets, and specifically none at the highest point!

- an alternative 4-wheel drive track for access

The isolation, so close to the city, is another reason why Kaukau is so special. Next it will be a revolving restaurant and a gondola. Whoops I forgot – that's already planned for Colonial Knob!

- Drinking water on Kaukau.

After 100 years, the only drinking water in the park below is inside the Khandallah Pool complex, which is locked off for 9 months of the year. As a ratepayer the idea that Kaukau will get facilities ahead of children using Khandallah Park I find offensive. Also, it is my understanding that the monies to be set aside for Khandallah Pool are for a pool upgrade and not for park facilities.

- Rubbish disposal facilities on the tops

The standard advice is carry it in, carry it out. Visitors should be made aware of this.

- Shelters

Shelters are more clutter on the landscape. There are numerous escape routes down to more sheltered areas. We are talking Kaukau here, not Mt Aspiring.

I am in favour of more signage, although less so about the ongoing expense of wayfinding. Much more effective to encourage people to snap a photo of the signs at the entrance ways. Signage around off-leash dogs, no biking areas, and livestock management are to be encouraged. More historical information would be good too, but getting funding for that is like drilling for oil. Khandallah Park, one of New Zealand's oldest, currently has no historical signage.

Given the central library financial burden on ratepayers I also don't support the expense of 10 fancy entrance ways which is gilding the lily. Particularly unnecessary is an educational woolshed in Crofton Downs, because both Otari and Zealandia are very close, and would/should cover much of the same information. Informative signs would be much better value, although Council has a poor record of maintaining these – I'm thinking of the historical signs outside Cummings Park Library, Khandallah Library and Ngaranga Gorge

In short the Kaukau experience is a gem precisely because it hasn't been standardized, sanitized or dumbed down. In view of the demands on the ratepayers purse please keep it the way it is – which is already very popular.

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Submission on the 2019 draft Outer Green Belt Management Plan

Submitter

Wayne Pincott

Tawa 5028

Introduction

Although I am a member of the executive committee of the Friends of Tawa Bush Reserves (FOTBR), and was President of the society at the time we advocated for the Council to acquire the Forest of Tane, I am making this submission in my own private capacity.

Submission 1 – leave the Forest of Tawa intact

I submit that WCC should not harvest or fell the pines trees in the Forest of Tawa and that part of Spicer Forest which adjoins it (i.e. on the Tawa (east) side of the Spicer Forest Road. The Council should instead allow the existing well-developed under-storey of native species to naturally succeed the pines.

The original rationale presented to the Council by FOTBR for the purchase of the Forest of Tawa was to protect its ecological, recreational and water management value. Felling the pines is unnecessary, and will compromise each of these values. The FOTBR submission explains this in detail, and I will not repeat the explanations here.

However, I will add that the Tawa community meeting in 2018 (over 200 people attended) which supported the purchase, and was attended by the Mayor, was presented with the social and green benefits of keeping this block undeveloped and *allowing it to regenerate naturally as it is already doing*. I have attached the flier used to advertise the meeting, as evidence of what it was the community was supporting.

Submission 2 – leave the Forest of Tawa intact

Councils have the unenviable job of identifying the needs and desires of multiple users of reserve land across the region, and optimising their plans as best they can. I support WCC's strategy of recognising particular sectors as best suited to specific types of usage, and that Sector 2 places greatest emphasis on the needs of walkers and horse riders (given proximity to the rural area of Ohariu), whilst cyclists are catered for by the nearby Rangituhi/Colonial Knob mountain bike park, as well as the proposed Porirua Adventure Park.

I support continued provision of public access between Kiwi Crescent and Spicer Forest Road, and submit that:

- the needs of walkers should be considered as primary, including keeping them safe by separating walking access from cycle access
- the middle section of the existing track includes stunning panoramic views up, down and across the Tawa valley for walkers, and that section of the track at least should be prioritised for walking

I also submit that the existing connection from Chastudon Place to Spicer Forest Road could be made more attractive to cyclists, if the short initial section was improved, i.e. through a better grade and drainage. The rest of that track is of a much more suitable gradient for cycling than the steep track through the Forest of Tawa, so if the initial section can be fixed, it might be regarded by cyclists as a preferable alternative.

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Submission 3 – protect the remaining privately held bush on Tawa's western hills, and enable public access

I submit that WCC should acquire or otherwise protect the privately held bush between Rewood Bush and the Airstrip Block.

Acquiring or protecting the land supports the stated Outer Green Belt value of 'the increasing continuity of the reserve land from north to south'.

Formally enabling public access to this land would provide a connected 2.5-hour loop track through the reserves on Tawa's western hills, as well as enabling access from Redwood to Colonial Knob and Te Araroa.

The prospect of a loop track (with multiple access points) was presented to the community and to the WCC as a key benefit of buying the Forest of Tane. The track already exists (and has done for decades), but because some of it is on private land, it can't be formalised or properly maintained, nor can the public be invited to enjoy the use of it.