

Panel questions

In order to gauge familiarity, have any of you visited Red Rocks on our South Coast?

Have you all read my submission?

To commence, I suggest there is a reasonable expectation that Council documents should be free of error and untruthful statements. Community feedback should be about soliciting public opinion rather than prolonged dialogue over accuracy of content. **The public should not be used as proof readers.**

At a glance, it would seem the authors have opted for length rather than accuracy opening Council up to ridicule.

My journey in respect to this draft started in November 2020.

I suggest, at times officers have demonstrated;

- A lack of intimate knowledge,
- Been defensive,
- and at one point, have been untruthful.

Now for some examples.

Red Rocks Wetland – supporting photos 1 & 2

As touched on in my written submission, consultants Boffa Mikell identified what appeared to be a **potential wetland** in 2011 when undertaking a **desktop** project for Greater Wellington. I have been told the scope of the project did not request, nor fund any “on site” work. The Draft District Plan written about 10 years later cites the possible wetland with the text including *“The extent, type and quality are uncertain and a site assessment would be required”*.

It is concerning that officers are including elements into the draft plan without first checking the facts. There is **NO WETLAND** at this point and there is NO need for a site assessment. All the authors had to do was make an internal enquiry with the team responsible for the management of the South Coast Reserves, neither a time consuming nor difficult task. Ranger staff pass by this point almost on a weekly basis. Writers have relied on unconfirmed data produced for a different agency a decade earlier. When challenged an officer wrote ***“It is plausible that the depressions between the boulders provide habitat for saline-tolerant species,”*** really!

Kinnoull Dunes/ Weevil Reserve – supporting photos 3 & 4

Following early claims regarding the existence of a gazetted weevil reserve I requested a copy of the formal gazette notice. On 6/12/21 I received a reply saying ***“We still need a bit of time to locate this gazette notice. We will come back to you as soon as possible.”***

Six months later, after requesting an update, it was ***“unable to find a gazette notice, however we did find a notice of land acquisition in 1983 for the area that was the Weevil Reserve. But since it has been subsumed into the Te Kopahou Reserve it has not been mentioned in the description”***

Unless someone can convince me other-wise it would seem **this is a clear example of misrepresentation.**

It took until 18/8/23 before Council acknowledged that gazettal never occurred, that’s nearly two years since the initial request for a copy of the gazette notice. As for the claim the area had been “subsumed into Te Kopahou Reserve,” well 17 months after being told it had been added Council wrote saying ***“The reference to Te Kopahou was an error”*** There was no attempt to explain how the “error” may have occurred.

Neither of the backdowns included an apology.

At one point, officers also asserted the sand dunes at this point were being damaged by off road vehicles. Interestingly their position altered when I told them a fence had existed for 10-12 years and NO vehicles had driven on the remnant dunes since the fence was erected.

Claims of there being ***“Areas of unmodified duneland”*** at this point were likewise withdrawn when I pointed out the site had been used for commercial sand extraction with much going to a Wellington City Council owned asphalt plant that once operated near Lyall Bay.

Had I not challenged Council it is highly probable these silly statements would have been carried forward into the final document. In a guide to reserve administering bodies, the Department of Conservation wrote that management plans should be ***“pleasingly presented as well as absolutely factual”*** The same principles should also be mandatory for District Plans.

Analysis of submissions

The analysis of submissions as viewed on the web contained errors of fact regarding my personal submission.

Personally, I find this lack of basic administrative skill disgraceful. The failure to accurately record or present detail, questions the robustness of the officer’s report. To support this aspect, you are encouraged to look at the papers I have provided today, these are;

- Extract from PDP using names to identify individual baches on the South Coast (paper 1).
- Advice conveyed via submission (paper 2)
- Email dated 25/11/22 expressing dissatisfaction over the online summary (paper 3)
- Extract from the summary council officers are providing you as part of the PDP process (paper 4)

“6.1.4 Mr Insull sought that the names of items 38 and 39 be amended to reflect current leaseholders. Ms smith considered that the names in the schedule for these two items are correct, and refuted Mr Insull’s submission.” Really!

At best the listing shows the names of folk associated with the baches at a point in time perhaps as far back as 20-30 years. Officers have failed to grasp the message I was trying to convey and that was, **I did not believe names were actually required.**

Decision makers should not be put in a position whereby they are left to question the accuracy of documentation officials place before them. Another example is Council officers have rejected my comments with respect to the descriptive "Te Rimurapa/ Sinclair Head" – Analysis SCH10 32.17

In forming your opinion, I draw your attention to the entry in the NZ Gazeteer by Land Information New Zealand staff (paper 5 of attachments). Here the wording clearly includes; "***Sinclair Head/Te Rimurapa. This is an official name***".

One further matter of frustration, was that when responding to a recent written request for information, also linked to the Proposed district plan, Council provided nearly 150 pages, all of which missed the mark. Although each page was interesting, they never the less failed to address the original question. Looking through another set of eyes it should be of deep concern formal answers to questions under the Local Government Official Information and Meetings Act are not receiving the attention they deserve.

My plea is that you make it clear to Council's Chief Executive that;

- (1) There is NO place for untruthful or inaccurate statements in either official correspondence or documentation.**
- (2) Officers and their managers must place greater emphasis on accuracy.**
- (3) Processes need to be in place to ensure requests for information are actioned in both a timely manner and meet any statutory requirements such as the Local Government Official Information and Meetings Act.**
- (4) You seek an assurance that before sign off the plan (PDP) it is free of silly errors.**

Some years back when acting as departmental specialist before a Parliamentary Select Committee I was given a hard time by a member of Parliament for getting a date wrong. The cutting remark was "if you have got the date of the legislation wrong why should we believe anything else you have written" or words to that effect. That mistake pales into insignificance compared to the silly comments I have spotted or subsequently encountered after reading just a small section of this draft plan.

Public participation would likely be enhanced if they were given quality documentation free of bias and errors.

Before finishing I respectfully suggest the time between soliciting community input and sign off is far too long. In this case it is likely to be nearly four years.

Thank you for your time.

Barry Insull

1 Red Rocks

(Image supplied by Boffa Miskell)



2 Red Rocks



3 Kinnoull Dunes



4 Kinnoull Dunes



5 Kinnoull Dunes

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Extract from PDP.

37	2 Rugby Street	Basin Reserve	Rugby Street - 2 (LOT 1 DP 90475)	Includes Museum Stand, RA Vance Stand, Groundmen's Shed, Playing Oval and Picket Fence, Gates, J.R. Reid Gate and C.S. Dempster Gate), Former Midland St Pat's Cricket Clubrooms, Fence Posts (1917), William Wakefield Memorial, Terraced Seating, Toilet (south end), Scoreboards, Light Towers and Bank.	A, B, C, E, F	Basin Reserve Historic Area 7441
38	300 Owhiro Bay Parade	Mestanes Bay Baches	Owhiro Bay Parade - 300 (PT LOT 1 DP 26766)	Includes King Bach, Boshier Bach, Gray Bach, Stevenson Bach (Rear)	A, B, C, E, F	Mestanes Bay Historic Area, 7510
39	380 Owhiro Bay Parade	Red Rocks Baches	Owhiro Bay Parade - 380 (PT LOT 1 28821) (LOT 1 DP 28821 - HISTORIC RESERVE)	Includes Smith/Bell/Pentfold Bach, Insull/Karsten Bach, Taylor Bach, Perkins Bach	A, B, C, E, F	Red Rocks Baches 7509
40	500 South Makara Road	Albion Gold Mining Company Battery and Mine Remains	South Makara Road - 900 (PT SEC 62 Terawhiti District (RT 321565)), (LOTS 3 4 DP 375401 SECS 1-4 8 10-13 13A 14-17 19-26 29-32 51-52 55-59 94 98PT SECS 9 33 50 54 60-64 73 75 TERAWHITI DISTRICT LOT 3 DP 5864 BLKS II IV V VIII IX PORT NICHOLSON SD - PT SECS 950 61-63 SECS 13 29 51 98 - LOTS 3-4DP 375401 SUBJ TO ESMT DP 433)	Includes Proposed Albion Gold Mining Company Battery and Mine	A, B, C, E, F	Albion Gold Mining Company Battery and Remains 9032

Extract from written submission
of B. Inshell ②

Rocks is the most accessible in the lower North Island and is a geological feature of national interest and winter seal haulout. Boffa Miskell identified a potential natural wetland at Red Rocks in 2011. However, the extent, type, and quality are uncertain, and a site assessment would be required to determine its value.

Despite the passage of nearly nine months since the issue was first raised there has been absolutely no change in the wording. No wonder many within the community show little to no interest in Council's activities. It's officers, or should I more correctly say some, seem unwilling to listen or take advice. As for an inspection, it is not warranted. If the officers were really interested then they could have made an internal phone call to the designated South Coast Ranger. Neither a difficult nor time-consuming task.

To add confusion, the attachment to an email received from "District Plan" timed at 12.40 on the 25/7/22 includes a schedule that states "**The wetland at Red Rocks was.....**". Now we have gone from a "potential wetland" to "The wetland" as if there was one. The question I ponder is why do officers not verify facts. As pointed out earlier there is no wetland at this point. Someone needs to take "ownership" and make an apology. Feel free to challenge my view but accuracy of fact is a basic principle of professional report writing.

The statement that the area (Red Rocks) is a winter seal haulout is also inaccurate, few seals are seen on the rocks at this point. The recognized haulout (Sinclair Head /Te Rimurapa), a gazetted Scientific Reserve in its own right, is approximately one-kilometer westwards.

Part 4 Schedule 3 Heritage Areas

The rationale behind identification of each of the baches both at Mestanes Bay and Red Rocks is both unclear and generally reflects earlier times. It would have been tidier to have used detail from current lease documents if indeed names were actually necessary. I make the observation that one named person was only associated with the bach for a relatively short period, another has been deceased for a number of years, and others have long sold up and moved on.

In relation to the baches at Red Rocks, the final column (HNZP) fails to include the wording "Historic Area", whether this is important or not I am unsure. Perhaps not relevant, but unlike those at Mestanes Bay, the Red Rocks baches form part of the mosaic of a gazetted 75-hectare Historic Reserve.

As co-owner of one of the registered "Historic Baches" I welcome the inclusion of the Red Rocks baches in the District Plan.

Part 4 Schedule 7 Sites of Significance to Taranaki Whanui

As a matter of personal interest could an officer, please write to me setting out what detail Council has used to endorse a category "A" ranking for the Whare Raurekau Kainga? (Site 44)

In relation to site 157 (site or area of significance to Ngati Toa Rangatira) some modification to the text may be required. Noted Wellingtonian G Leslie Aitken, farmer, geologist and ethnologist 1888-1964 is often referred to as a go to man in relation to the early history of the area. In his publication, "The Great Harbor of Tara" Pariwhero or "Pari-whero" as he put it, has the meaning of "red cliff". That land [cliff] is under Historic Reserve designation yet this is not mentioned in your descriptive

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Email to Council expressing
concerns over analysis.

bipest@xtra.co.nz

From: bipest@xtra.co.nz
Sent: Friday, 25 November 2022 12:10 pm
To: 'PDPsubmissions'
Cc: MURRAY TAYLOR
Subject: FW: Dist. Plan analysis

Council has published on line an analysis or summary of individual submissions on the Proposed District Plan. That document seems to be available for all and sundry to view. Given it was produced by Council it would be reasonable for interested persons to expect all detail has been accurately recorded.

In relation to comments attributed to my own written submission (number 32), I make the following comments;

32.4 & 32.5

Would you please review the text under "Decisions Requested" to correctly reflect the submission.

In short I said "*It would have been tidier to have used detail from current lease documents if indeed names were actually necessary*" (emphasis added). First you have to determine if they (individual names) are actually needed. Personally I do not think that under normal circumstance the names of lease/ license holders are warranted in high level documents.

In your summary as worded, the reader is led to believe my submission was to have the names updated to reflect current leases.

32.10

Here it is recorded that "Decisions Requested" was not specified. Although technically correct, the summary fails to record that one was implied. The submission asked Officers to consider what constitutes "Sinclair Head"

32.15

The truth of the matter is that officers need to reassure themselves that speargrass weevil (*Lyperobius huttonii*) still actually exist in the area discussed in the Proposed District Plan. I note neither Wikipedia nor Manaaki Whenua / Landcare Research use the descriptive of "Long beach weevil" for *L. huttonii*.

32.18

Get it right.

I said "*There is also a typo in the site summary, **Te Rimurapapa** is incorrect*"

32.21

It is an absolute mistruth for Council to say I sought that "*the site summary of Taputeranga Island under SHED10 (Outstanding Natural Features and Landscapes) be clarified to list threatened and rare species of birds and lizards that have been accurately identified in the area*"

What I did say was "*While the Marlborough "mini" gecko may well have been seen near the two named points, the existing text fails to add balance by stating the species also inhabits other sites between Makara and Island Bay including Taputeranga Island. In the absence of full or wider information a reader could have a distorted picture of the situation.*"

There was **NO** request to amend the site summary of Taputeranga Island. Someone may wish to apologise.

32.25

Please re-read my submission and para-phrase correctly.

Extract from WCC Officers Report

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heritage values of the area. To exclude certain buildings would be in contrast of that intent.

613. We concur with Mr McCutcheon and Ms Smith, and recommend rejection of these submission points.

Mestanes Bay Baches (Item 38) and Red Rocks Baches (Item 39)

614. Mr Insull²⁵⁴ sought that the names of Items 38 and 39 be amended to reflect current leaseholders. Ms Smith considered that the names in the schedule for these two items are correct, and refuted Mr Insull's submission.

615. We agree with Ms Smith that the names are appropriate, and should not reflect the leaseholders, which could change at any time. We do not recommend any amendment.

Albion Gold Mining Company Battery and Mine Remains (Item 40)

616. Te Kamaru Station Ltd²⁵⁵ submitted that Albion Gold Mining Company Battery and Mine Remains (Item 40) are located entirely on Terawhiti Station, and therefore the reference to Te Kamaru Station in the legal description should be removed. Terawhiti Farming Ltd (Terawhiti Station)²⁵⁶ considered the curtilage of the remains is too broad and sought to amend the boundary accordingly.
617. We did not hear further from either submitter, but Ms Smith investigated these submission points and found that errors had occurred in the legal description as well as the map. She therefore recommended the entry to be corrected, and we agree.

²⁵⁴ Submission #32
²⁵⁵ Submission #362
²⁵⁶ Submission #411

New Zealand Gazetteer

Search for place names in New Zealand, its continental shelf and Antarctica.

Feature class/type:

Territorial Authority:

Land District:

[Leaflet](#)

You are currently viewing New Zealand. Click [here](#) to switch to the Antarctica view.

How to Use

Matches Found 28

Details

Official name
Sinclair Head / Te Rimurapa

This is an official name
Status: Altered

Search Result

Sinclair Head
This name is not official
Current Status: Replaced
Feature Type: Point
Feature Description:
Located along the south coast, west of Wellington, topographic
260-R27-R28&PT-Q27-Wellington 536 813, rising to over 160
Feature shown on: NZTopo50-BQ31 436196

Events

2009-09-03: NZGB Revoked/Replaced 2009 (131) p.3074
2009-08-05: Treaty Settlement Legislation Revoked/Replaced
Section 83 to 87 Port Nicholson Block (Taranaki Whanui ki T
Upoko o Te Ika) Claims Settlement Act 2009

Location

41.362S 174.717E (View in [Google Maps](#))
Land District: Wellington

User Settings

Barry INSUII

Sub No / Point No	Plan Part / Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested
32.21	Part 4 / Schedules Subpart / Schedules / SCHED10 – Outstanding Natural Features and Landscapes	Amend	<p>Considers that the site summary for Taputeranga Island could provide a distorted picture of the species inhabiting the sites due to lack of wider information.</p> <p>The Marlborough “mini” gecko may have been seen near the two named points. The existing text fails to add balance by stating the species also inhabits other sites between Makara and Island Bay including Taputeranga Island.</p> <p>The officers' response failed to address the identification and distribution of the bird species. Banded dotterel (Conservation Status- declining) have been seen in this area and greater numbers can be found elsewhere on the coast. It is possible coastal trapping established as part of the Capital Kiwi programme will lessen the effects of predation on rare and threatened species.</p>	Seeks that the Site Summary of Taputeranga Island under SCHED10 (Outstanding Natural Features and Landscapes) be clarified to list threatened and rare species of birds and lizards that have been accurately identified in the area.
32.22	Part 4 / Schedules Subpart / Schedules / SCHED10 – Outstanding Natural Features and Landscapes	Amend	Considers that the appropriate name for the water body between North Island and South Island, as determined by the New Zealand Geographic Board, is “Cook Strait”. The name “Raukawa Coast Cook Strait” in SCHED10 should be amended to “Cook Strait Coast”.	Amend title of “Raukawa Coast Cook Strait” to “Cook Strait Coast” under SCHED10 (Outstanding Natural Features and Landscapes).
32.23	Part 4 / Schedules Subpart / Schedules / SCHED10 – Outstanding Natural Features and Landscapes	Amend	Considers that the phrasing “Known as Wellington’s wild coast” in Raukawa Coast Cook Strait’s site summary is not adequate and should be amended.	Seeks that language in the Site Summary of Raukawa Coast Cook Strait’s be amended to remove “Known as Wellington’s wild coast”.
32.24	Part 4 / Schedules Subpart / Schedules / SCHED12 – High Coastal Natural Character Areas	Amend	The subtitle under SCHED12 (Sinclair Head / Te Rimurapa) is non-compliant with official dual English/Māori name legalised in 2008 and should be amended. The Te Reo name for Sinclair Head is “Te Rimurapa” and should be included in the subtitle.	Amend language in SCHED12 (High Coastal Natural Character Areas) to “Sinclair Head/ Te Rimurapa” instead of “Sinclair Head”.
32.25	Part 4 / Schedules Subpart / Schedules / SCHED12 – High Coastal Natural Character Areas	Amend	Considers that the Coastal Cliffs East of Karori Stream Estuary does not qualify as a historic habitat for Long Bay Beach Weevil. [Refer to original submission for full reason]	Seeks that language in Key Values of Coastal Cliffs East of Karori Stream Estuary be amended to remove mention of “a historic habitat for Long Bay Beach Weevil”. [Inferred decision requested]

the species also inhabits other sites between Makara and Island Bay including Taputeranga Island. In the absence of full or wider information a reader could have a distorted picture of the situation. For reasons unknown the officers response failed to address the identification and distribution of the bird species. That said while I have previously seen banded dotterel (Conservation Status- declining) in this area greater numbers can be found elsewhere on the coast. It is possible coastal trapping established as part of the Capital Kiwi programme will lessen the effects of predation on rare and threatened species.

Given the District Plan is a high level or perhaps statutory document every attempt should be made to achieve accuracy and compliance with Central Government directives. Currently, the appropriate name for the water body between North Island and South Island as determined by the New Zealand Geographic Board is "Cook Strait". That being so the first heading should perhaps be the "Cook Strait Coast" and not "Raukawa Coast Cook Strait". There is no issue with identifying the te reo name but it needs to be within the right context. This is not the only example where non-compliance with official names exists e.g. Schedule 12 Sinclair Head, it would appear someone forgot to add Te Rimurapa. The dual English/ Maori name was legalized around 2008.

I would also question the descriptive "*known as Wellington's wild coast*". This is a relatively modern marketing descriptive primarily used by latte sippers and pen pushers. It is certainly not a phrase used by those with a close association with the coast.

Part 4 Schedule 12 Sinclair Head /Te Rimurapa- Karori Stream Estuary

Narrative here includes; "Areas of unmodified duneland and habitat for historic habitat for Long Beach weevil".

Given officers were unaware of historical commercial sand extraction at this site I would be interested to learn what information Council is reliant upon when referring to "areas of unmodified" dunelands?

In the initial draft of this document there were spurious claims of a Weevil Reserve. When challenged I was told although a gazette notice could not be found, it [the reserve] had been "*subsumed into the Te Kopahou Reserve*" (email 4/5/22). This too is likely to be incorrect as the 2009 Kinnoull Conservation Covenant includes wording such as "*The parties agree that; (b) such purpose can be achieved without the WCC acquiring a fee simple or leasehold interest in the Land*". Nowhere in the covenant is there any reference that grants an automatic right of access to the land thus the public's use is quite different to the area known as Te Kopahou Reserve. It would not look good if claims of both a gazetted weevil reserve and the area being "subsumed" into Te Kopahou were proven to be false. Incidentally, the trapping that I am personally involved with around the dunes primarily targets mustelids as part of the Capital Kiwi initiative. I am unaware of any trapping to "*protect the site*" (line 22 SCHED8).

As presented, it would seem the "Long Beach Weevil", if they exist, are of a different sub species from that generally found on the south coast -*Lyperobius huttoni*, the greatest density of such I am told is currently some distance from the Kinnoull dunes/Long Beach in harsh environment below the Te Kopahou trig. If this is correct then the plan's claim "*This site supports the only known North Island population of speargrass weevil*" would seem questionable.

which focuses solely on rocks likely to have been underwater prior to the 1855 Wairarapa earthquake. The Department of Conservation administered Scientific Reserve which was gazetted in 1972 is essentially a relatively small area on the seaward side of the legal road.

Part 4 Schedule 8 South Wellington Coastal cliffs...

Much effort has gone into describing the various land designations of site 144. My question is why was the established Scenic Reserve not also identified? Like the Red Rocks wetland this perhaps suggests either poor administrative knowledge or processes.

Line 14 of the text for site 144 states that Sinclair Head is a Scientific Reserve, in general terms a point not disputed. The question I encourage you to ponder is just what is "Sinclair Head", the final 30 odd meters before the land enters the marine zone, distant rocks off a headland or perhaps the headland as a whole. If you were to choose the latter it would be necessary to make it clear "Sinclair Head" comprises two reserves.

At several points it is recorded that shingle beaches are endangered e.g. site 122 (Tounge Point). Given numerous shingle beaches exist between Owhiro Bay and Makara perhaps it would be helpful to explain both why such a designation exists and set out what mitigation/enhancement measures are being undertaken and perhaps by whom.

Text around the Pariwhero / Red Rocks and Sinclair Head / Te Rimurapa Scientific Reserves tell you what's in each of the reserves but fails to explain the very purpose of these specialist reserves. This needs to be corrected.

Another observation is what I would describe as an inconsistent approach. The description for site 144 for example goes to lengths listing bird species yet sites 122 and 146 are silent.

To end this section on a positive note, it was pleasing to see credit being given to the Wellington Cross Country Vehicle Club in relation to their conservation input to protect and enhance the covenanted Kinnoull dunes. The club has been active in a number of like activities for many years.

Part 4 Schedule 10

The heading "Te Rimurapa Sinclair Head/ Pipinui Point Pariwhero Red Rocks" is both confusing and likely incorrect. Surely, it was not the intent that this section, traverse in excess of 30 kilometers of coastline. If my summation is correct, then Pipinui Point needs to be removed. The second point is that Te Rimurapa Sinclair Head is back to front. The official name is Sinclair Head / Te Rimurapa. There is also a typo in the site summary, Te Rimurapapa is incorrect.

Is there any substantive reason why the "Site Summary" does not make reference to the gazetted Historic Reserve?

The Pariwhero / Red Rocks Sinclair Head / Te Rimurapa area contains just one seal colony. It is incorrect to say colonies.

Text under this section suggests the headland is "home" to threatened and rare lizard and bird species. This issue was raised with officers who were asked to identify each of the threatened /rare species and comment on populations elsewhere on the coast. While the Marlborough "mini" gecko, may well have been seen near the two named points the existing text fails to add balance by stating