
ORDINARY MEETING

OF

**OUTER GREEN BELT MANAGEMENT PLAN HEARING
SUBCOMMITTEE**

MINUTE ITEM ATTACHMENTS

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

Business

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Item 2.1 Attachment 1





Item 2.1 Attachment 1





Item 2.1 Attachment 1





Item 2.1 Attachment 1





Item 2.1 Attachment 1



2019 Outer Green Belt Management Plan Submission 17/04/2019

Submitter: Stephen Watson as Trustee on behalf of Long Gully Station Trust.
longullynz@gmail.com

Firstly a little geography for those unfamiliar.

Long Gully Station is the land that lies between Zealandia and Cook Strait, it enjoys 2.5 kilometres of Wellington's wild yet ruggedly beautiful South Coast from Sinclair head around to South Makara. Long Gully Station is bounded to the East by the Hawkins Hill ridge-line (proposed Te Koupahou Scenic Reserve) and to the West by South Makara, South Karori, and to the North Wrights Hill, Karori.

Long Gully Station has been our family property and home for 26 years. All of our 5 children were raised on the property and all continue to live on the property along with our 8 grandchildren. To enable our family to remain on the land, subdivision has been necessary and parcels of land have been sold to new owners outside our family who, while appreciating the same rural lifestyle within minutes of the CBD are primarily looking to the future to provide for their own young families both land and houses by way of subdivision.

Long Gully Station adjoins approximately 10 kilometres of the subject Outer Green Belt.

Submission:

Whilst we largely support this Outer Green Belt Management Plan and absolutely support Council's right to do what it likes on its own land where it does not negatively impact on its neighbours, the purpose of our submission is not to sing this plan's praises but as significant neighbours of the OGB to highlight aspects of the plan that will affect us negatively.

1/ We strongly object and will oppose any reclassification of Hawkins Hill Road (our principle access-way) or part thereof to be included within the boundaries of the proposed Te Koupahou 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 be removed from Parks and Gardens and rightfully come under the Wellington City Council "Transport and Infrastructure"

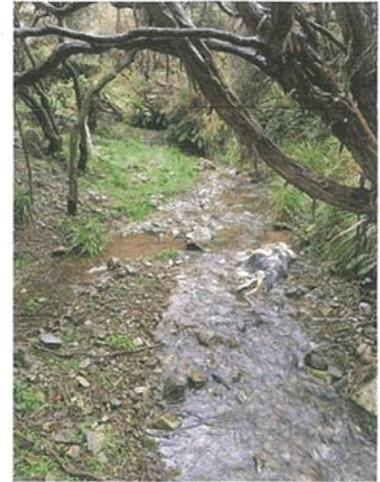
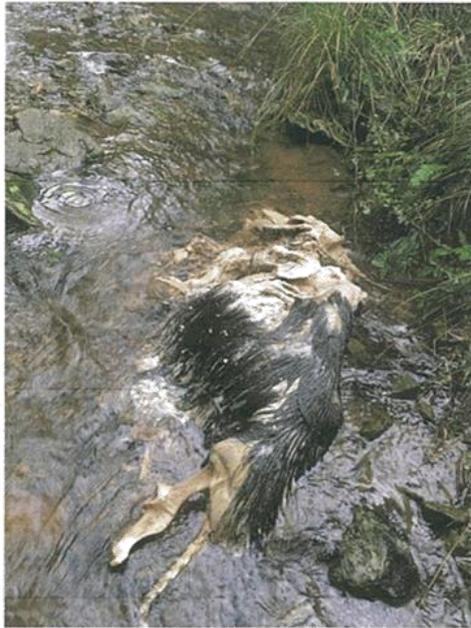
Explanation:

Calls by ourselves over many years for the Hawkins Hill Road, right of way, to be classified as a public road (for that is how it is now used by all of Wellington) so that, 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, nor will to upgrade and maintain the road to anything close to a safe carriageway for the ever increasing general public use, promoted by Council. 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 as a condition of any increased general public use, the road is upgraded substantially by Council to accommodate the increased mixed use.

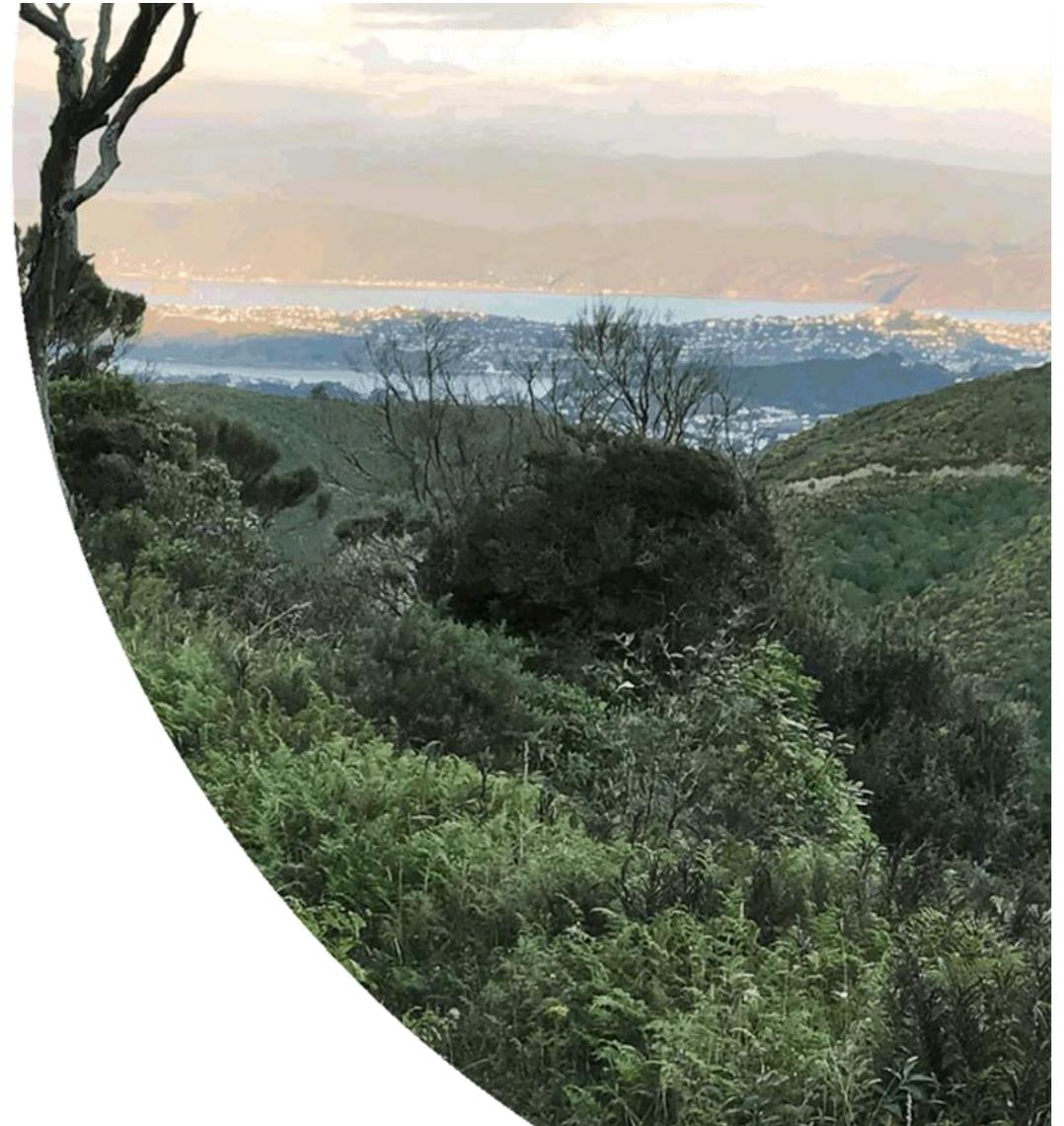
We have no confidence in Parks and Gardens ongoing management of the road and we have experienced many years of its poor management to support our concerns. (Please see current photos of Hawkins Hill Road's condition in spite of 2 years requesting Parks and Gardens to undertake road maintenance)

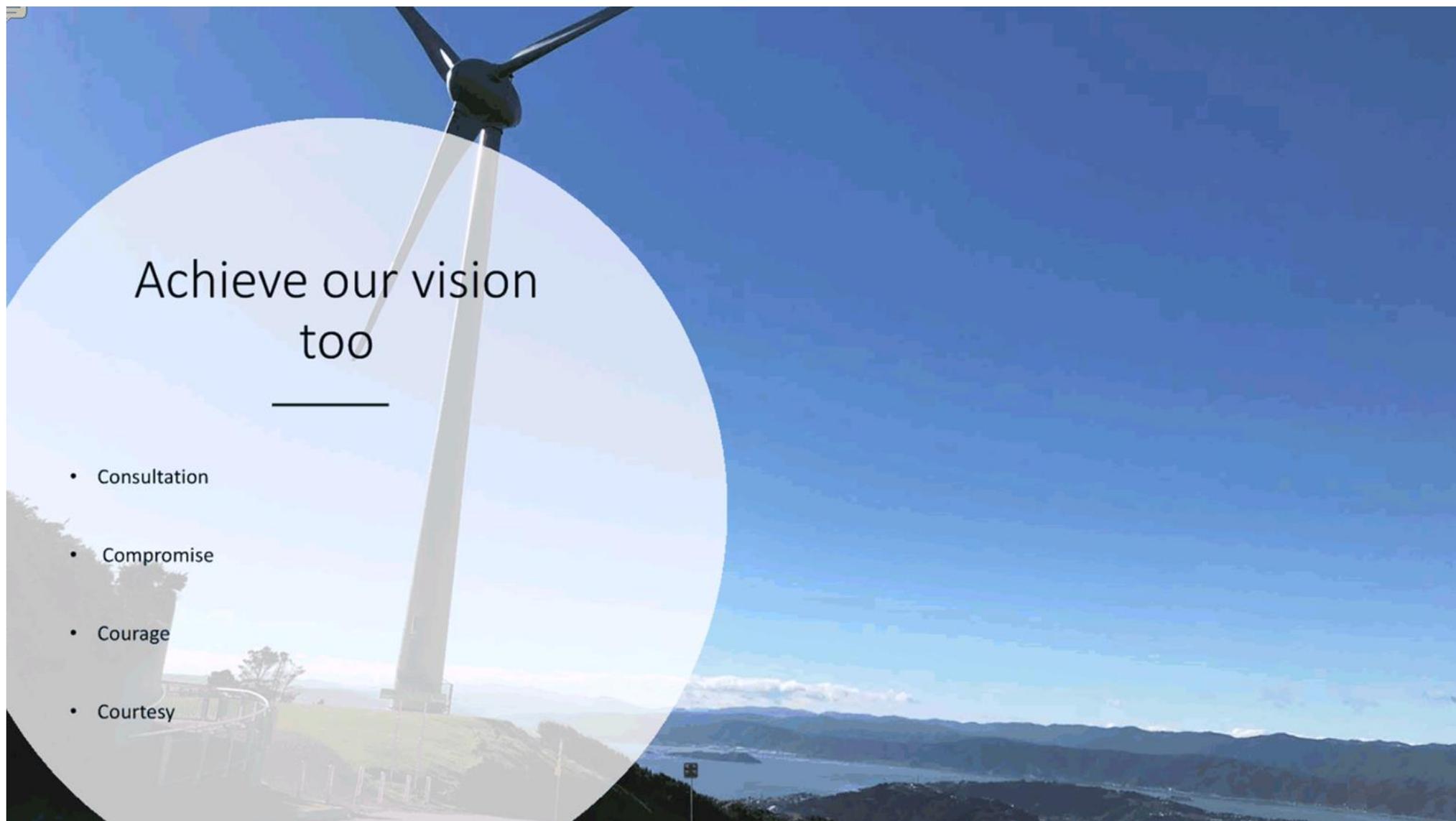
DEAD ANIMAL CARCASSES IN LONG GULLY STATION WATERWAYS



OGB Oral Submission

- Pam Olver
- Resident of Sector 7 – Te Kopahou





Sector 7

- Rugged
- Quiet
- Unspoiled



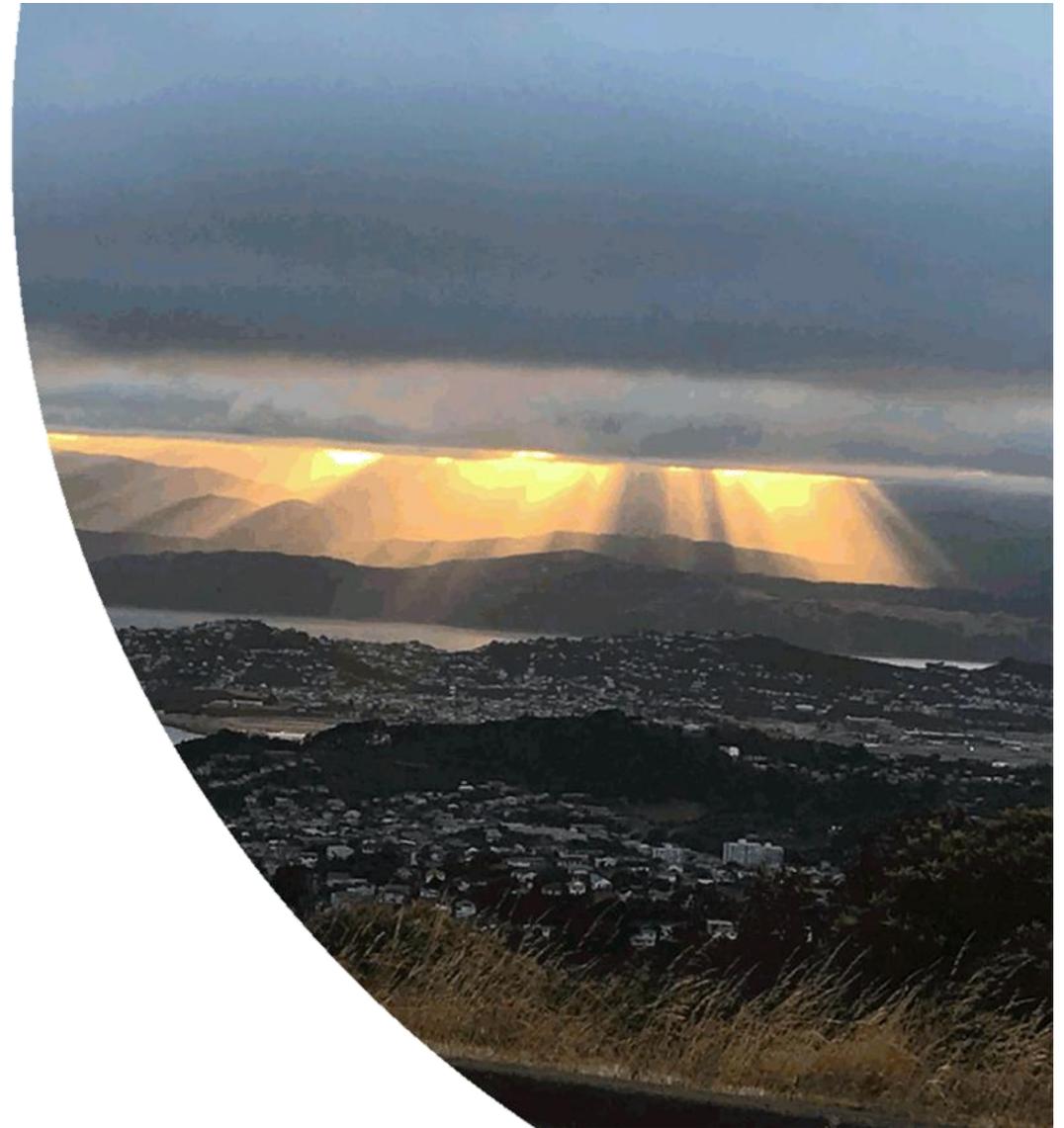
Sector 7 Issues – conflicts with the council's vision

- Access
- Commercial Activities
- Relationship with council



To Take away

- Listen
- Look after
- Leave a legacy





WALKING CAPITAL

OUTER GREEN BELT (OGB) MANAGEMENT PLAN REVIEW 2019 SUMMARISED SUBMISSIONS ON PLAN HIGHLIGHTS

Our position statement on Wellington's Outer Green Belt

1. Keep it local; keep it natural; keep it minimal
2. Keep commercial interests and activities out

1. Complete the Outer Green Belt

- Goals are mutually inconsistent
- OGB sectors are contiguous but ecologically diverse
- "Wild Green Connector" presents as a transport plan

2. Protect the land under the Reserves Act

- Approach is fudged and inconsistent
- Makara Peak should be re-classified a Recreation Reserve

3. Complete the Skyline Track

- No obvious local demand for a "continuous ridgetop route"
- Not appropriate as basis for destination tourism
- Keep e-bikes off the ridgetops and out of the bush

4. Protect and enhance the ecological corridor

- Agree in principle

5. Protect and restore streams

- Agree in principle

6. Weed and pest animal control

- Agree in principle

7. Protect the landscape

- Agree in principle

8. Trial phasing out grazing

- Agree in principle

PO Box 25-638
Wellington 6146
info@walkingcapital.nz

9. Provide and promote outdoor recreational opportunities

- Let users self-select from existing opportunities
- Engage natural environment on its own terms

10. Enhance the track network

- No more mountain bike tracks in sectors 3, 4 and 6
- Review existing shared tracks policy
- Consult widely before developing sector 7

11. Develop five new main entrances

- No obvious local demand or need for more entrances

12. Heritage inventory and interpretation

- Agree in principle
- Focus should be on signage and public apps

13. Encourage and support community partnership

- Not as a substitute for budgeted allocations
- Not as a trade-off for inconsistent activities
- Must be unconditional and relevant

14. New rules section

- Not as a device for legitimising inconsistent activities
- Default must be to keep commercial interests and activities out

15. Monitoring plan

- Agree in principle
- Should be co-ordinated with other public land/reserve plans
- Used as basis for improving community engagement and consultation



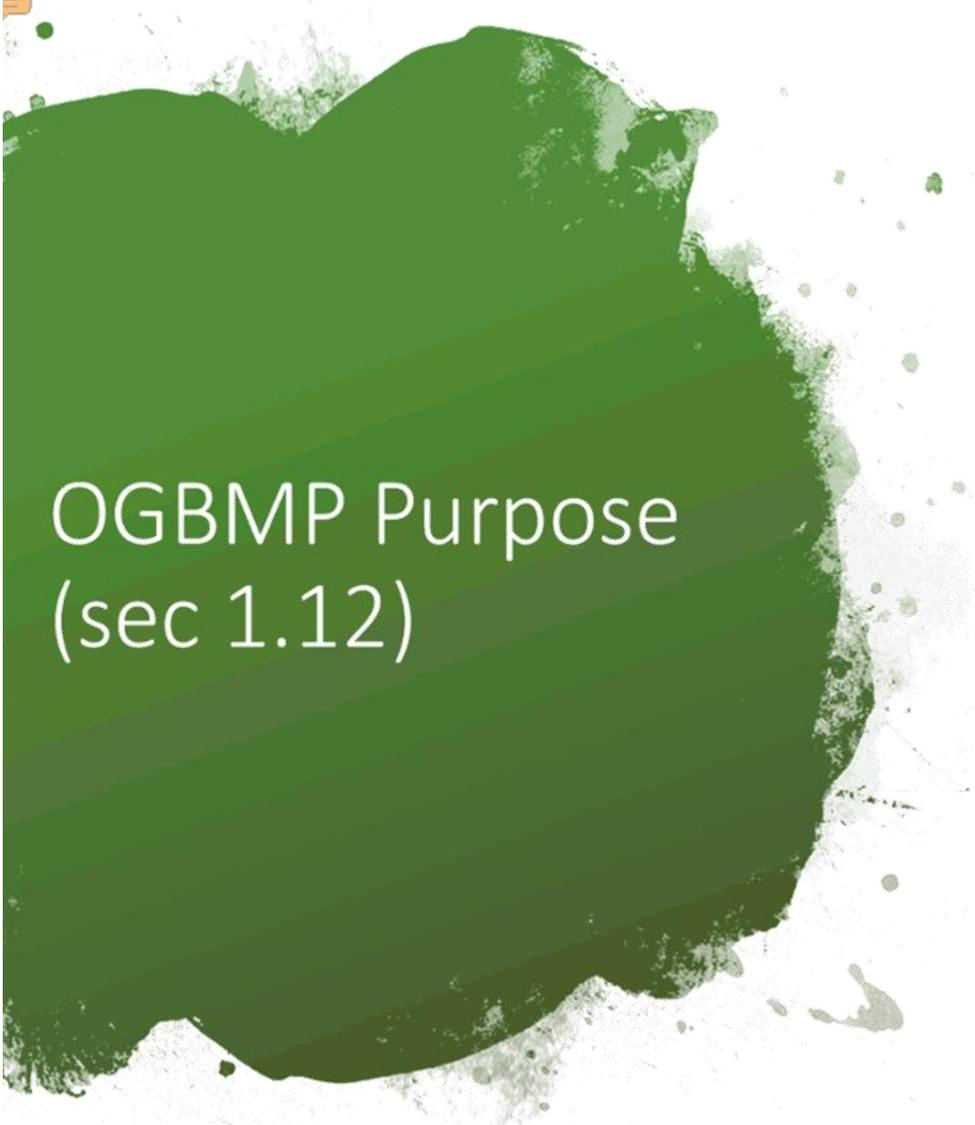
Rod Lingard
Walking Capital





Key objections:

- Describing maintenance of Strip for mutual benefit of Council and residents as 'encroachment'
- Proposals to: completely revegetate Strip, and/or
- create a public walking track; and
- reclassify Strip as a reserve



OGBMP Purpose (sec 1.12)

- *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.*

History: recognition of mutual benefit

- **Long history of engagement** between Water Board, WRC, WCC, Zealandia Trust and residents acknowledges **mutual benefit of residents' maintenance** of Strip
 - Acknowledges importance of **security, privacy, views, property values, fire protection**
- **WRC 1997:** *"... agreement that the use and maintenance of the land by adjoining property owners meant that the Council... did not have to control vegetation growth in these areas and therefore provided mutual benefit."*
- **2004 OGBMP:** *"it has been maintained and used in common by Versailles Street residents for many years... The ...boundary runs very close to some of these houses and the area may not work well as a reserve... Resolve issues in consultation with adjoining residents and the Sanctuary Trust."*

Revegetation or track?



Zealandia fence line track **already** part of Outer Green Belt north to south corridor vision



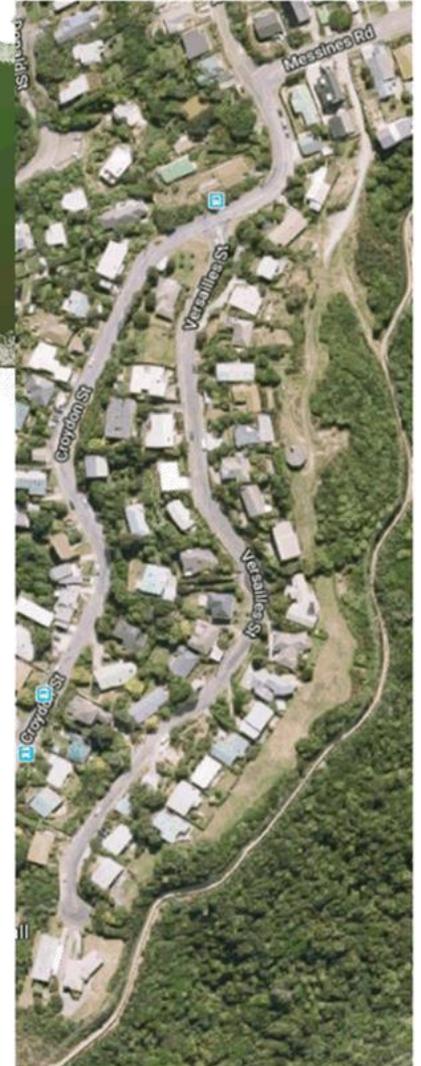
Vegetation barrier **already** between track and houses



Already *community co-operation in maintenance of green belt fringe*



Already successful example of *OGBMP aims*





Fire break

Strip established as a fire break and its use as such more vital than ever



Risks of Proposals

- **Expensive earthworks and maintenance costs** for a duplicating track to nowhere
- **Loss of community space, privacy, security, views, property values** previously acknowledged by Council to be important
- **Increased fire risk** in time of climate change and potential legal liability for Council
- Council in **breach of obligations and commitments to engagement and cooperation** with community

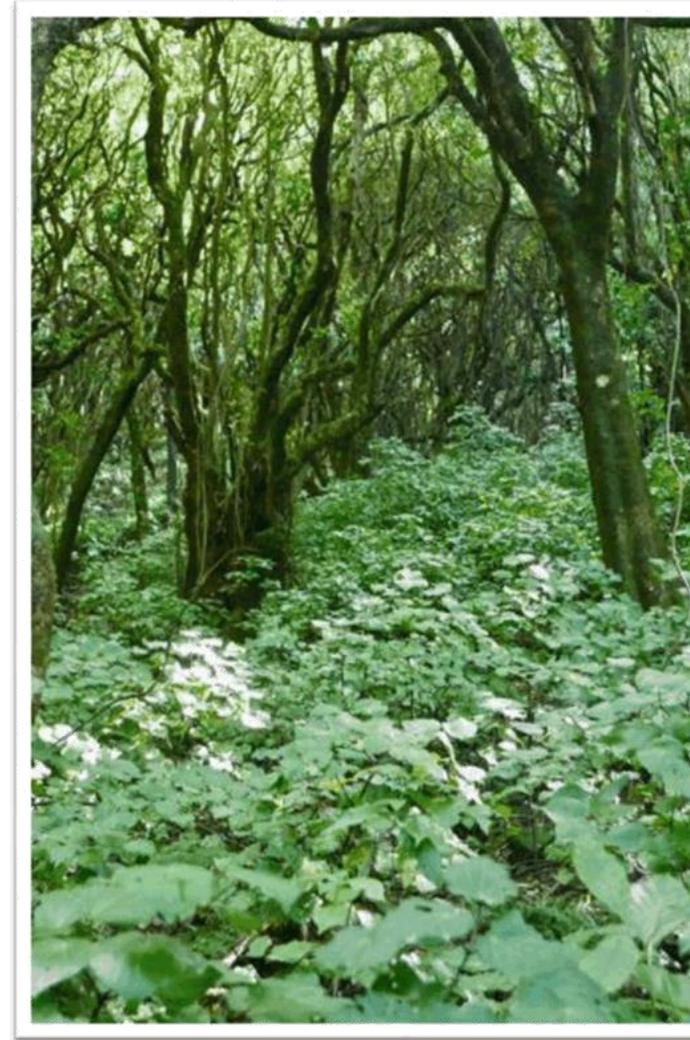
Next steps

- Revert to wording in 2004 plan relating to Strip
- Recognition of mutual benefit
- Council works with us in good faith to finally resolve issues
- Involvement of Group representatives in development of final OGBMP plan in relation to Strip
- Binding agreement, such as MOU, on use of Strip

JOHNSTON HILL

SCENIC RESERVE

Mountain Bike Track Development



Kawakawa grove
Manky Gully

RESERVES CLASSIFICATION & RECLASSIFICATION

Johnston Hill Scenic Reserve ? A

Why is 4.2.9 **58B David Cres.**
Scenic Reserve B

When

3.3.19 -55 Baroda Street Khandalha is Scenic A

3.3.25 58 Simlar Cres. Scenic A

149 Curtis St. [Wilton Bush Reserve] **Scenic A**

SCENIC Reserve B Classification

....**which by development** indigenous or
exotic, **will become** of significant scenic interest ...

Johnston Hill Scenic Reserve

Does not fit into this classification

JOHNSTON HILL SCENIC RESERVE

FITS SCENIC RESERVE A

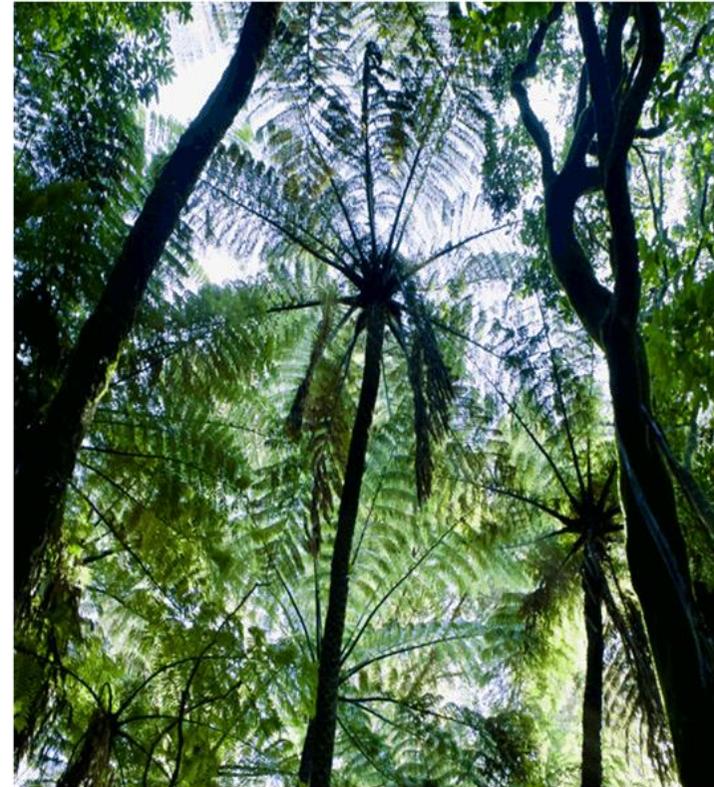
SCENIC RESERVE A Classification

To protect and preserve in perpetuity

Manky Gully bush

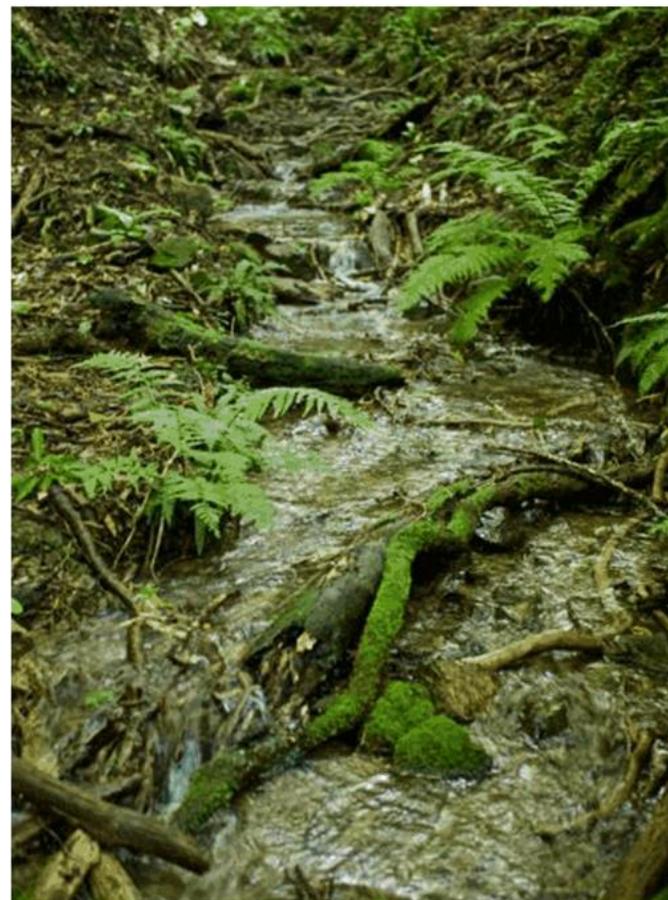


Kohekohe tree with fruit



Bush Manky Gully

Clean & Clear streams after storm



JOHNSTONS HILL SCENIC RESERVE A

- Mountain Bike Track Development

Why use Scenic Reserve land?

Mountain Bikes can use any pine forest.

MTB tracks **scar the landscape**- images on Google

Always said J.H. tracks were **not** suitable for bikes

Outer Green Belt

**“ providing all things to all people....has potential
to degrade the diversity of values & experiences”**

- **What proportion of MTB need grade 5?**
- **A survey found 80% users are walkers**

“Already wide variety of high quality bike tracks....”

WALKERS NOW have few tracks where they are not **nERVOUS of being hit by a bike or shouted at ‘bike coming’**

Walkers happy to help with trapping & planting.

Walkers use the pines to get up and down from the Skyline

Walkers, runners, use these tracks everyday.

Away from pollution, traffic and noise

**Medical experts tell us smooth footpaths are not
the best place to walk.**

HIGHLY SIGNIFICANT ECOLOGICAL VALUE for OGB

It is CROWN land labeled **CONSERVATION**

Half is pre1840 forest remnant bush

Nationally & internationally significant

**Need to protect and enhance OGB
ecological corridor**

INDIGENOUS FLORA & FAUNA
threatened need to Protect

Interferes with ECOLOGICAL CORRIDOR

Extra noise of bikes & humans will **SCARE the BIRDS**

Kohekohe groves --few left in lower North I.

Compaction of soil around trees will effect growth of trees

Glorious variety of fungus after rain

STREAMS

5 Streams run down Johnston's Hill

Bike tracks will be across streams

Manky Gully follows a stream!!

WCC objective“ protect & restore streams...”

Contains 3-4 threatened fish species includes eels

SOIL

- **Runoff** from the tracks will enter streams
- **Rocks** should be left as a natural feature
- If soil disturbed **erosion** will occur
- **Widened/altered tracks** leads to **Gorse, Darwin Barberry & weeds** to grow.

- BIKES
- Skyline to Cemetery Track leads into Otari bush!!
- Wider tracks will fragment wildlife habitat
- Bikes breakup the tracks & make tracks v muddy.
- Intersections are dangerous
- Bikes rarely give way to walkers on walking tracks
- **Narrow parts of Skyline** are now **dangerous** eg
Makara Rd thru pine forest

- **Keep bikes on the Skyline track, Makara Bike Park**
- **350 km of bike tracks already**
- **No bikes on Johnston's Hill or Otari Wilton Bush**
- **No entrances for bikes to Johnston's Hill or Otari Wilton** *****5 entrances in Karori**
- **Change OPEN Spaces Plan for these areas**

RESERVES CLASSICATION & RECLASSIFICATION

JOHNSTON HILL Scenic RESERVE

WHY is

4.29 58 B David Cres. Scenic Reserve **B**

WHEN

3.3.19 55 Baroda Street Khandallah Scenic Reserve **A**

3.3.25 58 Simlar Cres. Scenic Reserve **A**

149 Curtis Street Scenic Reserve **A**

JOHNSTON HILL

Does not fit -Scenic Reserve **B**

Fits SCENIC RESERVE **A**

- Half covered in pre 1840 forest,
- Rest regenerating forest
- Part of Western Wellington Forest Key native Eco system
- Part of OGB & Ecological corridor
- Part of Sanctuary to Sea

JOHNSTON HILL SCENIC RESERVE A

Mountain Bike Track Development

WHY USE SCENIC RESERVE A LAND?

Mountain bikes could use any pine forest, many local pine forests.

What proportion of MTB need grade 5?

A survey 2018 found 80% users were walkers

“Already wide variety of high quality bike tracks...”

Many walkers use the pines to get up and down from the Skyline.

Walkers, joggers, runners, dog walkers would like some tracks – **with out being frightened of being hit by a bike or shouted at ‘bike coming’**

Walkers are happy to help with trapping & planting, do so already.

Walkers use these tracks everyday in fact as much if not more than Skyline track as out of the wind & in shade.

Away from pollution, traffic and noise of the city

Medical experts tell us smooth concrete paths are not best place to walk.

WCC VISION to invite people to escape the city & explore

OUTER GREEN BELT

'natural value & character....' Is its essence

providing all things to all people.... has potential to degrade the diversity of values & experiences

HIGHLY SIGNIFICANT ECOLOGICAL VALUE for OGB

Johnston Hill is NOT LOW Ecological

It is Crown land originally labeled CONSERVATION

Half is pre 1840 remnant forest

**Nationally & internationally significant next to Otari
Wilton Bush**

ONLY - a small part pines

**Mostly remnant regenerating forest
eg MANKY GULLY where proposed down hill track**

INDIGENOUS FLORA & FAUNA threatened

The EXTRA NOISE of bikes & humans will SCARE the birds.

Kohekohe tree grove - few left in Nth Is.

Variety indigenous trees feed native birds

Need to keep tracks away from drip line & root system.

Young Nikau trees now growing

Variety of glorious fungi. Otari Bush has Fungi tours

SOIL

- **Bush protects soil & streams**
- **Rocks should be left as natural feature**
- **Tracks cause continual runoff into streams**
- **If soil disturbed erosion will occur**
- **Once widened for bikes Gorse, Darwins Barberry & weeds will grow**

STREAMS

- WMTBC says it's a dried up river bed
- It is a running stream
- Stream runs down beside Manky Gully Track.
- 5 streams run down- these proposed tracks will need to cross them!
- Streams contain 3-4 threatened fish species
- Bush protects streams - flow into the Kaiwharawhara & Karori Streams

BIKES

It was agreed Johnston Hill tracks were **not suited** to bikes

The proposed tracks are **close to Otari Bush** there are already tracks to Otari from Cemetery to Skyline track. MBT did not mention this.

Bikes breakup tracks & make tracks v. muddy.

Wider tracks will fragment wildlife habitat.

Intersections are dangerous

Bikes rarely give way to walkers on walking tracks

Narrow parts of Skyline are now dangerous for children & older walkers eg Between Makara road and end of Karori Park Pines

Keep bikes on the Skyline, Makara Bike Park, Wrights Hill, Polhill

350 km of bike tracks

No Bike Entrances Johnston Hill or Otari Wilton bush.

- **Already 5 Entrances to the Skyline in Karori**

Need to change OPEN Spaces Plan for this

Item 2.1 Attachment 9

Friends of Tawa Bush Reserves Inc.

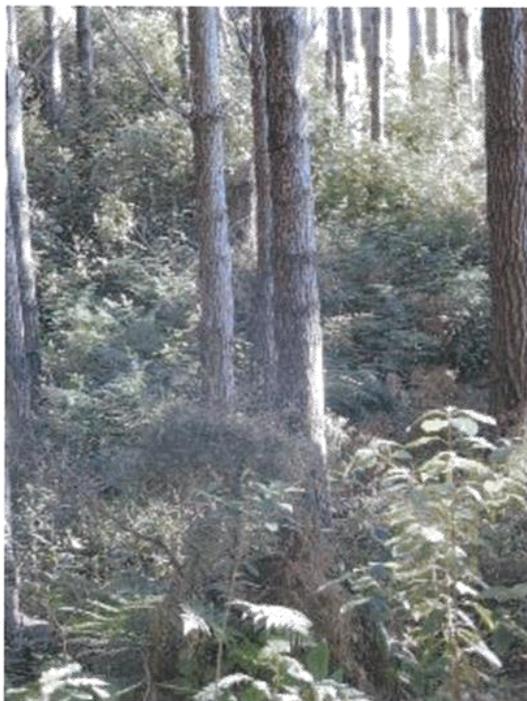
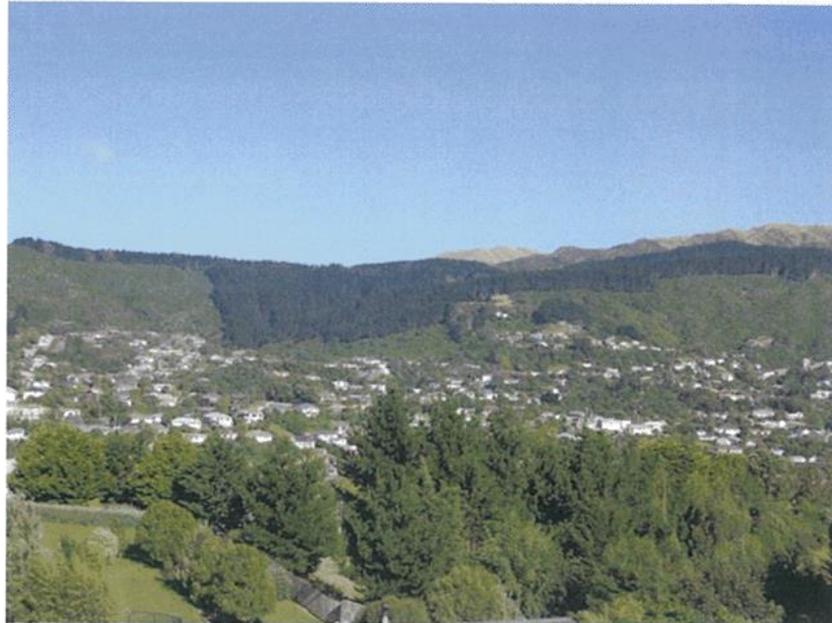


Save Tawa's Forest

Public Meeting
Sun 19 Feb 4 p.m.
Tawa Community Centre
5 Cambridge St, Tawa

This is our one opportunity to save the land known as the Forest of Tane, on the western hills of Tawa, for future generations. The land is for sale, with offers closing on Feb 27th. Once it's gone, it's gone.

The land agent is promoting the Forest of Tane for, '*an immediate forestry return, and potential sub-division investment available.*' In other words, cut down and log the forest, and replace it with 'lifestyle' rural residential sections.



We want the Council to purchase the land and add it to the Outer Green Belt. It will give Tawa a direct connection to key walkways and reserves, notably Te Araroa (the national walkway), Colonial Knob, and Spicer Forest.

As well as the social and green benefits of keeping this block undeveloped and allowed to regenerate naturally as it is already doing, it provides part of a key ecological corridor between Wellington City (Zealandia) and the Kapiti Coast (Mana and Kapiti Islands), and also via Belmont Regional Park to the East Harbour Forest Park, for the migration of reintroduced native birds.

Purchasing the land will also save the Council from far greater costs in mitigating the effects of development. The block contains a large catchment with stream tributaries that flow into the Porirua Stream and then on to the Porirua Harbour. Tree harvesting and development would add considerably to the flooding potential which we have already experienced from this stream in the Lyndhurst Park and Town Centre areas of Tawa and put at further risk the downstream Linden areas of the Porirua Stream. And of course the additional erosion sedimentation will end up in the Porirua Harbour.

Come to the meeting and show the Mayor and Councillors that the community wants them to act!

WCC OGBMP Presentation

Introduction

Who I am

I don't have a PowerPoint

Role with NZFWDA

- who we are
- recognition of CCVC as the main partner with WCC

History with CCVC

History with WCC

General

I don't need to go through our submission, I know you will have read it

and I'm sure you will have noted our general support for the principles and details in the plan

We've made a few suggestions at the detail level that we thought would bring further clarity

and these included specifically recognising certain additional volunteer contributions to date, relative to the recreational 4wd community

There is the possibility of recognising some 4wd-related activities as "signature" events

As mentioned in our submission, the scope of our submission is purely about 4wd access to tracks throughout the OGB

Our main points

The focus in the plan on allowing and encouraging recreational use of the OGB is admirable and we support this fully

Our main point is ensuring that potential access to the track network is not totally closed off

We would like to ensure it is clear that

- the plan allows for access under certain conditions
- as was addressed in the previous plan
- while we are not advocating open-slather 4wd access
- and not even suggesting frequent access
- we do want to ensure access is allowed for under a "managed access" protocol

Importance of managed access regime

- what it is and where it works
- we strongly advocate it

Opportunities for access

- 4wd club members
- those with limited mobility
- special interest groups, eg historic
- Summer programme, visitors to Wellington

South Coast Red Rocks Road

Unclear what the intention is, in the plan

We advocate its ongoing use by the public

We agree there needs to be a regime that offers fair shared use

Closure on Sundays seems to have worked well

Further development of the shared use concept seems a sensible and inevitable next step

I have confidence that the 4wd community would contribute effort towards developing this

We strongly recommend introduction of a by-law to set a speed restriction

- as has been done elsewhere in NZ
- which then allows for enforcement

Shared use

HDC signs in Cousins Ave Reserve

GW signs in Akatarawa Forest

4wd clubs prepared to assist in forming & monitoring separation

and clearly other volunteer groups too, going by audience input at an earlier session

In closing

Not sure whether there will be further consultation once plan updated from this round

I suspect it may prove to be useful, at least with respect to the South Coast Red Rocks road

We're keen to review & provide feedback on such a further draft

Grant Purdie, National PRO
New Zealand Four Wheel Drive Association

Glenside Progressive Association Inc

Oral Submission on Outer Green Belt

Barry Blackett 17 April, 2019



Marshall Ridge looking towards Spicer Forest

We strongly support most aspects of the Outer Green Belt Management Plan – Comprehensive, well thought out and timely.

Tracks

- Completing the Skyline and other high level tracks soon has a clear benefit.
- However, access and loop tracks starting close to where people live are important as well.
- These include walking tracks in other reserves and to lower level lookout points.
- East-west tracks could link other northern suburbs to the OGB, eg a track from Seton Nossiter under SH1 through Glenside Reserve to Marshall Ridge and beyond, forming part of an integrated network.
- Such tracks could be created to synergise with and enhance the *green-blue networks*.
- The need to use cars to access OGB tracks or provide shuttle links between ends of OGB tracks should be taken into account when planning high level tracks.

Entrances

- Proposed new Main Entrances should be considered with caution due to likely high cost. Existing primary entrances are very successful because they are multipurpose.
- Proposed new entrances could be created as secondary entrances and upgraded once the need is proven, saving costs.
- We support more secondary entrances with good signposting.

Sector 2 - Ohariu

- This sector is the weak link in the OGB – narrow with large gaps - but is the most important link for Churton Park and Glenside residents.
- Council are trying to purchase more land and find ways to access Ohariu Ridgeline but this will be difficult.
- Council needs to look harder at alternatives.
- Marshall Ridge including the forest block north of the pylons offers great potential. This option should be added to the OGB (see photo).
- A secondary high level entrance below the saddle between Upper Stebbings Valley and Tawa in due course would offer easy access to both Spicer Forest and Marshall Ridge.
- Existing visual overlay protection (DPC 33) must be preserved in the Upper Stebbings and West Glenside Structure Plan.

Planting

- Planting in selected areas could add significant benefits but we advise caution.
- Keeping native seedlings alive through increasingly frequent droughts and storms will be a challenge.
- Planting should not be carried out without a maintenance plan which includes wind protection, regular watering, and survival monitoring and reporting in first two to three years after planting.

Conclusions

- A lot has already been achieved over past decades. Many benefits are already available.
- We see the OGB Management Plan as a means for locking these benefits in and a blueprint for taking the next steps in a continuous long term development rather than for an intensive 10 year programme that might take resources away from worthwhile developments in other reserves.
- OGB tracks should be linked up to a wider east-west track network.
- In Sector 2, Marshall Ridge has the potential to offer what Ohariu Ridge cannot currently deliver.
- Planting needs to be supported with a robust maintenance plan.

Guy Holmes

Points to put to Council at Oral hearing 17/4/19

1. Request confirmation that the intention to appropriate the use of our farm at 148 Makara Road into Greenbelt land as shown in the 2004 Council Green Belt Vision document has now been dropped.
2. Request whether Council have taken into consideration the uncertainties of boundaries between proposed reserves and private land. Our farm, like most of the farms here is 'Limited as to Parcels' and as such has not been surveyed. What due diligence has been done to ascertain where those boundaries are and avoid unintended encroachment on private land?
3. Request Council to explain from what the land currently managed as reserve – and that to be classified as reserve – needs protection (as described in the Consultation documents) beyond that afforded by Council's powers, Byelaws, the District plan and other current legislative protection.
4. The aim of S.16 of the Reserves Act 1977 (The Act) is to ensure that the classification of reserve is in accordance with its primary purpose. The lands history of acquisition and current use is relevant to consideration of primary purpose.

S.16(2A) Notwithstanding subsection (1), where any reserve was—
(a) vested in a local authority which did not derive its title to the land from the Crown; or
(b) created under section 17 of the Land Laws Amendment Act 1920; or
(c) created under section 16 of the Land Act 1924; or
(d) created under section 13 of the Land Subdivision in Counties Act 1946; or (e)
purchased out of money paid out of the Land for Settlements Account in accordance with section 14(2)
of the Land Subdivision in Counties Act 1946; or
(f) created under Part 20 of the Local Government Act 1974; or
(g) created under Part 10 of the Resource Management Act 1991—
and is or remains vested in a local authority, that local authority shall, by resolution, classify the
reserve according to its principal or primary purpose, as defined in sections 17 to 23.

- Council's consultation documentation does not disclose how land was acquired such as to demonstrate compliance with S.16. Descriptions such as 'acquired by transfer' do not disclose why or how land was acquired which is material to S.16.

- The current primary purpose of much of the land involved is as Recreation reserve affording many uses and freedoms on it that will now be greatly reduced. This has not been brought to the attention of the public well enough.

5. The Consultation process is flawed as it does not properly inform Wellingtonians of the implications of allowing the proposed OGBMP to go ahead. The 'implication of classifications' given on p.6 of the Proposed Reserves Classification document is inadequate.

Also, Council have described each part of land as being 'Scenic A' or 'Scenic B' when these classifications are not defined in law and are not clearly defined in consultation documentation such as to give the public sufficient idea of what is really proposed.

Removal of rights and freedoms currently enjoyed on Council owned land. Council have not informed the public that the proposed classifications will make a host of criminal offences applicable to relatively harmless activities currently carried out on much of the land in question. It also introduces offences and punitive and uninsurable liabilities on owners of adjoining land in relation to fire (S.97). Some examples of the criminal laws include – it becoming a criminal offence to use offensive language to a Council employee – even, for example, if they inadvertently drove over your foot (S.98(b)). It will become a

criminal offence if an animal 'trespasses' onto the reserve (sheep, cats, dogs) (S.94(b) & S.96). Dropping an apple core (because of its seeds) (S.94(d)), picking a flower or taking a stick of wood to walk along with (S.94(f)) all become either crimes or infringement crimes along with many others under the Reserves Act.

6. Council have not properly explained what an irrevocable step is being proposed and the effect of any revocation of Reserve status should that ever take place.

The purpose of scenic reserves is described at S.19 (1) as putting those areas into reserve in perpetuity, essentially because of their intrinsic worth.

- I do not believe that the Council have properly established a consensus of Wellingtonians views on 'intrinsic worth' or indeed 'long term public interest' as laid down in S.19. Putting land into reserve under this Section must involve satisfying a test that these criteria are met. This can only be done by comparing it to any competing interests – such as those concerning the future expansion of the city.

- Council are seeking to bind their future successors in a way that is wrong – given that the whole premise of the OGB is in relation to the question of an expanding Wellington.

S.24(3) shows how hard it would ever be to come back from the proposed classifications. In the circumstances highlighted in the Section, the whole reserve might have to burn down for this to take place:-

No change of classification or purpose of a scenic, nature, or scientific reserve, or any part thereof, to a recreation, historic, government purpose, or local purpose reserve shall be made, except where, in the opinion of the Minister, the reserve or the part thereof is by reason of the destruction of the forest, bush, or other vegetation, or of the fauna or scientific or natural features thereon, or for any other like cause, no longer suitable for the purposes of its classification.

The situation above is unlikely to happen since S.97 includes provisions obliging certain individuals to pay for the entire re-establishment of the reserve in the event of fire.

7. The most significant point is that the OGB plan has always been part of the wider planning for Wellington's expansion but the Council are now seeking to get this land locked up in perpetuity before the Consultation process on wellington's expansion has been concluded.

This move will have the effect of hindering the alternative major expansion route for Wellington so that they will have no real choices set before them in the second consultation process on expansion.

8. I believe that Council's current proposals are excessive and in clear breach of the Purposes and Principles of the Resource Management Act .

S.5 (2)(a) of the RMA speaks of the reasonably foreseeable needs of future generations but these cannot be properly taken into account without first completing a full and open consultation on Wellington's expansion.

Guy Holmes,

[REDACTED]

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