



**REPORT 1
(1215/52/15/IM)**

**TOWN BELT LEGISLATIVE AND POLICY FRAMEWORK
REVIEW – MANAGEMENT PLAN AND DRAFTING
INSTRUCTIONS FOR PROPOSED WELLINGTON TOWN
BELT BILL**

1. Purpose of report

To seek the agreement of the Town Belt Management Plan Hearings Subcommittee (TBMPHS) to recommend to Strategy and Policy Committee (SPC) the major changes to the draft Town Belt Management Plan and drafting instructions for the proposed Wellington Town Belt Bill following public consultation.

2. Executive summary

On the 26 September 2012 the Council approved public consultation on the draft Town Belt Management Plan and the drafting instructions for a proposed Town Belt bill. The Council also established the Town Belt Management Plan hearings Subcommittee (TBMPHS) to accept and hear submissions on the review and recommend changes to policy to the Strategy and Policy Committee.

Public consultation took place between 16 October and 10 December 2012 with 259 written submissions received. 62 submitters also made oral submissions to the TBMPHS between 18 and 22 February 2013.

There was general support for the overall direction of the plan and the major initiatives and policy direction.

A number of additions and amendments were suggested to provide additional clarity and direction to the Management Plan and drafting instructions. This report outlines the main issues which were raised by submitters, and recommended changes to Policy.

A recommendation from this sub-committee is now being sought on the major changes to the draft Town Belt Management Plan as well as the drafting instructions for a proposed Town Belt bill. Then the final documents will be prepared for approval by SPC.

3. Recommendations

Officers recommend that the Town Belt Management Plan Hearings Subcommittee:

1. *Receive the information.*
2. *Accept the changes to the draft Town Belt Management Plan and drafting instructions following public consultation and outlined in appendix 1.*
3. *Recommend that Strategy and Policy Committee recommend to Council that the proposed changes to the draft Town Belt Management Plan and drafting instructions.*
4. *Agree to delegate to the Chief Executive and the Chair of the Subcommittee the authority to make any changes to the draft Town Belt Management Plan and drafting instructions required as a result of decisions of this Subcommittee, as well as minor editorial amendments, prior to the presentation to the Strategy and Policy Committee.*
5. *Note that officers will prepare a final draft of the Wellington Town Belt Management Plan and drafting instructions based on the above changes for approval by Strategy and Policy Committee.*

4. Background

In early 2010, a high level analysis of the legislative and policy framework for the Wellington Town Belt took place. This work resulted in a three stage project:

Stage 1: Development of guiding principles (completed)

Stage 2: Review of the Town Belt Management Plan and Town Belt Reinstatement Policy

Stage 3: Legislative change through a local Parliamentary bill

Stage one – guiding principles: Consultation on the draft principles took place in mid 2011 with a final set of principles adopted by the Council on 16 December 2011. The Council also agreed to a review of the Town Belt Management Plan and Town Belt Reinstatement Policy.

Stage two - The Town Belt Management Plan 1995 and Town Belt Reinstatement Policy 1998 Review Process: The review was completed in August 2012 with the preparation of the Draft Wellington Town Belt Management Plan (draft plan) to replace both documents.

Stage three: Legislative changes: Preparation of drafting instructions which outline why the legislative changes are needed and what they will achieve. These will form the basis for a local Wellington Town Belt bill to rationalise, clarify and consolidate Town Belt governance under the Town Belt Deed.

The Council approved consultation on the draft plan and drafting instructions on 26th September 2012. It also approved the establishment of the **Town Belt Management Plan Hearings Subcommittee (TBMPHS)** with the following Terms of Reference:

The Subcommittee shall have responsibility and authority to:

Accept and hear submissions on the review of the proposed Town Belt Legislative and Policy Framework Review – Draft Management Plan and Drafting Instructions for Proposed Town Belt Bill and make recommendations for changes to the Policy to the Strategy and Policy Committee.

4.1 Public consultation

Consultation took place between 16 October and 10 December 2012. This included

- Media releases and advertising in our Wellington Page
- Council website plus Facebook page
- On-site notices at major Town Belt entrances
- Direct distribution to key stakeholders and previous submitters. This included all of the clubs with leases on Town Belt, community groups working on Town Belt, 158 individuals and organisations who submitted on the guiding principles, all schools in Wellington.
- Three public meetings in the CBD (in conjunction with Friends of the Town Belt), Northland, and Newtown.
- Posters at libraries, community centres

5. Discussion

259 written submissions were received. 62 of these submitters also made oral submissions to the TBMPHS between 18 and 22 February 2013. Following the oral submissions, officers completed analysis of the submissions and identified the main issues (and proposed plan changes) that TBMPHS would need to now consider and recommend to SPC.

5.1 Feedback from consultation

The Town Belt Legislative and Policy Review Submission Form was used by 160 of the 259 submitters. The form asked submitters to indicate their level of support (or not) for a series of major proposals in the draft plan. It also asked for their level of support for the objectives of the proposed legislative change.

Question in submission form	Support¹	Neutral	Oppose
Overall do you support or oppose the general direction of management for the Town Belt?	115	22	15
The plan proposes to protect an additional 85.44 hectares under the Town Belt Deed (chapter 2 of the draft plan). To what extent do you support or oppose this?	132	14	14
The plan proposes criteria for assessing land to be added to the Town Belt (chapter 2 of the draft plan). To what extent do you support or oppose the criteria?	81	38	5
The plan proposes to restore and enhance ecosystems and increase the indigenous vegetation cover on the Town Belt (chapter 5 of the draft plan). To what extent do you support or oppose the criteria?	124	10	5
The plan attempts to balance retaining “natural areas” for informal recreation with the demands from organised sport (chapter 6 of draft plan). To what extent do you agree or disagree that the draft plan is achieving a balance?	91	22	6
The plan proposes to limit the development of sporting facilities to existing sports and recreation parks (chapter 6 of draft plan). To what extent do you support or oppose this?	96	20	20
Do you support or oppose the overall objectives of the proposed legislative change?	68	52	5

There is a more detailed analysis of these issues and the additional comments made by these and other respondents in the next section. However they do show support for the overall direction of the plan and the major initiatives and policy direction. Specific issues raised from the above data include:

- The number opposed to the limit of sporting facilities highlighted one of the key issues in the plan regarding the acceptable level of development of facilities. The 20 opposed to this question were split between those who felt the plan was too restrictive, (that is it should provide more flexibility for sporting clubs) and those who felt it was already too flexible.

¹ Of the 160 who used the form many did not fill in all of the fields meaning responses to individual questions do not all add up to 160.

- The large number of submitters neutral about the drafting instructions probably reflects the technical nature of the proposal and/or that the changes will not have much affect on the ground.

5.2 Draft Town Belt Management Plan: summary of main submissions and recommendations

This is a summary of the main submissions and recommendations. For a more detailed analysis see appendix 1.

5.2.1 Vision: Lack of long term vision and/or strategic direction in the plan.

Officers recommend that the existing aims in the 1995 plan are modified and included in chapter 1 as follows:

A Town Belt managed under the Town Belt Deed as a “public recreation ground for the inhabitants of the city of Wellington”

A sustainably managed Town Belt in which the recreational, natural, landscape, cultural and historic values are protected and enhanced

5.2.2 Legislative process first: One group want the proposed legislation to be passed into law and then the management plan prepared based on the legislation.

Officers recommend no change. The Council made a decision at the start of the project to manage it this way and for the management plan to be an interim plan at the time of legislative change. Consultation has been completed on the plan. Officers do not believe there is any advantage in stopping the project at this late stage.

5.2.3 Commercial activities: Town Belt is used by many people and groups for many purposes. There is growing pressure for more events and commercial activities like tourism to be on Town Belt and many submitters have concerns that this needs to be controlled or even prohibited, as these activities can prevent the general public from freely accessing the Town Belt.

Officers recommend that a clearer application process be included as an appendix to the plan. The proposed rules around commercial use of the Town Belt already identify the process and rules required for any tourism or commercial applications. Tourism activities are already included in the list of managed activities (9.4.3) under “guided tours”. This can be broadened to “guided tours and associated tourist activities” We can define what activities are ok for leasing of clubs in section 6.6.5 to 6.6.6. of the recreation chapter and link this to Ch 9 Rules.

5.2.4 Relationship between Management Plan and other policies: It is not clear how these other plans will influence the management of the

Town Belt. The biggest concern is when a policy in another plan may contradict the more restrictive policies or rules in the management plan – which has been developed to protect the Town Belt from too much development.

Officers agree it is not clear in the management plan on the relationship of other plans relative to the policies and rules in the Town Belt Management Plan. Officers have prepared a framework diagram (appendix 2), which shows the relationship of the different plans and policies and will be included in the management plan.

5.2.5 Values of the Town Belt: It is not clear or hidden in chapters 4-7– why residents are so passionate about protecting the Town Belt. The plan lacks a summary of Town Belt values.

Officers propose an addition to Chapter 1 (section 1.2), which identifies the values of the Town Belt and its role in the city. This will be based on the criteria in chapter 2 and will be as follows:

What makes the Town Belt distinct and recognisable? The Town Belt’s distinguishable features include its:

- *perceived continuity and horseshoe shape of open space, comprising the first line of hills and undeveloped skylines encircling the central city*
- *geographic location and close visual relationship with the central city and inner suburbs*
- *patchwork and diversity of vegetation cover*
- *availability to be used for a wide range of sporting and recreation activities*
- *accessibility and provision of linkages to key community destinations*
- *rich historical and cultural links with Wellington citizens and mana whenua*

5.2.6 Land additions and removals: There were many submissions on both lands currently managed by the Council proposed to become Town Belt and those lands not owned or managed by the Council that are part of the original Town Belt owned by the Crown or in private lands. Proposed changes in the plan as follows:

Land	Change in plan
Sector 1: Grant Road	Consultation identified several long established encroachments onto the unformed legal road with licences to occupy. It is recommended that the area not be added to the Town Belt at this stage. The Council will review all uses of this unformed road and develop options for its long term role as a buffer for Town Belt, whether

	some or all of the road should be stopped and whether some of these areas should be sold to adjacent property owners.
Sector 2: Clifton Terrace land	Agree with submitters regarding protection of its open space values. This will require a review and discussions with the Crown and Ministry of Education over their future plans. Amend description and remove reference to not being a high priority for addition to the Town Belt.
Sector 3: Polhill Gully land additions	The whole catchment comprising Council owned reserve lands be managed under the Plan and protected as Town Belt: Part of Polhill Gully Reserve, George Denton Park, Waimapihi Reserve, Panorama Heights Reserve, and Brosnahan Reserve. It is important that these reserve areas be treated and managed as one unit and on balance with one section currently part of the original Town Belt then it should all be covered. Remove policy 8.3.3.2
Sector 3: Te Aro School land	Agree with submitters regarding protection of its open space values. This will require a review and discussions with the Ministry of Education over their future plans. Amend description and remove reference to not being a high priority for addition to the Town Belt.
Sector 3: Raroa Reserve	Add Raroa Reserve to the Town Belt and manage under the Town Belt Management Plan.
Sector 3: Boyd Wilson Strip	Retain the strip as Town Belt to ensure long term protection. Victoria University have no interest in acquiring the land.
Sector 9: Land adjacent to 45 – 49 Lookout Road	Do not add this section of land which includes the formed driveway into Town Belt as 2 houses have legal access onto this driveway and it has low values as Town Belt.

5.2.7 Criteria for adding land to the Deed: Submitters suggested several changes to the criteria including:

- Limiting criteria to whether it was original Town Belt or making this the overriding criteria
- Land prior to 1873 should not be added to the Town Belt and kept as reserve
- Ecological value not necessary as criteria
- Include cost/benefit assessment
- Include range of recreation values including commuting, walking beside Town Belt on footpath

Officers recommend that the core criteria remain to allow additional lands to be managed as Town Belt and added under the Town Belt bill. Some changes include:

- *making the original Town Belt criteria first on the list to emphasise its importance,*
- *policy 2.9.4 point 2 add ".....and recreational values **and linkages** to neighbouring"*
- *A cost/benefit analysis should be used after the assessment has identified land suited to Town Belt (suggest new policy in 2.9) when the land will need to be acquired by the Council.*

5.2.8 Guiding Principles: Several submitters commented on the guiding principles and recommended changes. Two main proposals were that:

Principle 5 is changed from:

The Town Belt will support healthy populations of indigenous biodiversity **to**

The Town Belt will support self-sustaining indigenous ecosystems

Officers support this change

Principle 6. The Town Belt is for all to enjoy. The Accessibility Advisory Group recommended that the description accompanying the principle be changed to:

This concerns equality of access and the use of the Town Belt. The Council

“is committed to ensuring that the Town Belt will continue to be improved with more access and improved accessibility features where it is reasonably practicable to do so. Providing good accessibility features means that the Town Belt would be accessible and usable by everyone in the community. This includes: the able bodied, people pushing strollers, the elderly and people with impairments or disabilities”

Officers recommend that the wording accompanying Principle 6, “The Town Belt is for all to enjoy” be amended to better articulate universal accessibility. Note that this principle was broader than just accessibility as defined above.

5.2.9 Limits on development: Many submitters supported a limit on further development of the Town Belt for formal sport and recreation facilities (ie sports fields and buildings). Some think there should be no further development and any surplus buildings should be removed **while** some sporting groups said the limits were unfair and did not allow for future growth of sports or the development of world class facilities close to central Wellington.

A number of submitters want all proposals for new facilities on Town Belt to be publically notified.

Officers recommend no change to policies but better explain how the extent of each sport and recreation park affects where development can occur.

The proposed drafting instructions (paragraph 19.3) require Council to publicly notify and consult with the public for any construction of buildings on Town Belt.

In general, submitters supported the draft policy about maximising the use of existing facilities including co-location of sporting clubs and organisations. However some were concerned about the lack of a clear process for those who wished to apply for a development.

Officers recommend that a process diagram be added to the plan outlining the steps in the process.

5.2.10 Development off Town Belt: A number of submissions said development could happen anywhere in the city. All proposals to develop facilities or cater for elite sport or commercial activities on Town Belt need to start with an assessment of why they have to be on Town Belt.

Officers recommend that we move the assessment of alternative locations to first bullet point in Policy 6.6.3. to emphasise its importance

5.2.11 Pine tree removal: Several submitters were concerned about the scale of pine tree removal through clear felling of large areas and subsequent establishment of new plantings. They recommended that tree removal be limited to individual hazardous trees.

*Officers recommend the plan is amended to indicate future removals will be generally of a small scale (subject to the influence of major storm damage and overall forest health). Amend Policy 4.6.10: "**Exotic forest will generally be retained until trees fall or***

become hazardous. Hazardous trees will be removed based on risk assessments.”

5.2.12 Ecology chapter: Several submitters recommended changes to this chapter.

Ecological restoration of the Town Belt is a long-term plan – that will outlive the length of the management plan (10 years). There needs to be a long-term vision, such as for the Karori Wildlife Sanctuary

Officers recommend we include the broad target set in the 1995 plan which proposed a change from 20% native vegetation to 60% over the next 50 to 100 years.

Other submitters proposed that the chapter should be reorganised along the lines of the Biodiversity Action Plan with a focus on Identify, Protect, Restore and Research and that the Council organise a workshop with key groups to develop the long term restoration plans for the Town Belt.

Officers agree to the approach around rewriting the chapter. Officers do not recommend a workshop at this stage but that the revised chapter be sent to the key submitters for their review.

5.2.13 Culture and History chapter: A number of submissions want the Town Belt to be recognised internationally. Council should seek World Heritage Status for the Town Belt. This would ensure Councillors, as trustees, were overseen by the World Heritage Committee. Some mentioned Adelaide’s Town Belt as an example². To ensure authenticity in seeking World Heritage Status, Council should only be adding original-Town Belt land to the Deed.

The Town Belt should become a historic area under the Historic Places Act.

Officers recommend no change. Officers have discussed the proposal with DoC who are the nominating body for World Heritage applications in New Zealand. World Heritage Status is conferred on sites that represent the best examples of the world’s natural and cultural heritage. There are only 3 sites in New Zealand. To gain World Heritage Status, the site needs to have “outstanding universal value” – that is it:

- 1) has wow value(s) and*
- 2) is the best example in the world.*

² Adelaide Park Lands do not have World Heritage Status and has not been nominated. The local Friends group has advocated for World Heritage Status.

Officers do not recommend pursuing World Heritage Status for the Town Belt. There are numerous examples of town belts or green belts around the world.

New Zealand Historic Places listing provides recognition for an area – but not greater protection.

5.2.14 Rules chapter: Some submitters supported Council's policies around **encroachment** and want more of the existing encroachments on Town Belt to be removed.

Residents who are using the Carmichael Reservoir access road (off Owen St) are concerned about policy 8.7.6 and the current way the encroachment is being managed ie no new access permitted to new property owners or tenants. They are opposed to the phasing out of access permits and want to be allowed to continue use.

Officers recommend no change to the policy on encroachments as a prohibited activity. This will mean no change of the way this encroachment and others are managed.

Environmental education: Some submitters, involved with community gardens want environmental education to be allowed on Town Belt.

Others are opposed to formal education courses being run on Town Belt (contrary to Town Belt Deed)

Officers recommend any environmental education activity can occur when it supports the primary role and purpose to Town Belt and fits within the definition of recreation in the management plan.

5.2.15 Te Ahumairangi Hill: Mountain bikers were happy for more of Te Ahumairangi Hill Tracks to be open to mountain biking. This would also increase commuting options.

Some walkers did not want more tracks open to mountain biking. This would cause damage to tracks and safety concerns for other users on narrow tracks.

Officers recommend no change: Assess selected tracks using process in Open Space Access Plan policy in future.

There should be a track link from Glenmore St (the Botanic Garden) to Stellan Park.

Officers recommend that it is added to the plan as a potential track linkage, but not a high priority especially given it is across private land and of very steep topography.

5.2.16 Hataitai Park: Some submitters felt the policies were not strong enough around protecting the Town Belt from the loss of Town Belt for roading. The trustees should have a strong position on preventing the loss of Town Belt.

Officers recommend that the plan refer to the legal position of the Council as trustee by adding a section to 8.8.2:

The Council holds the Town Belt in trust and any negotiation around sale or exchange of land for roading needs to be carefully managed and the legal issues fully considered. It is noted that NZTA has the power to compulsorily purchase the land required from the Council.

5.2.17 Mt Victoria: Some are concerned about the potential removal of big areas of pine trees from such a prominent location. Other had concerns about the increasing use of the sector by mountain bikers and walkers. Loss of views from the lookout and the character of Alexandra road were also raised.

Officers recommend that a policy is added to 8.9.3 to develop a master-plan for Mt Victoria/Matairangi that looks at landscape, vegetation guidelines for future plantings and pine removal, as well as recreation development and ways to reduce user conflict.

5.3 Drafting instructions: summary of main submissions and recommendations

This is a summary of the main submissions on the drafting instructions. For a more detailed analysis see appendix 1.

5.3.1 The local bill will provide “relatively flexible powers: Many submitters had concerns that this approach will give too many powers to officers to make major decisions.

Officers recommend no change to this overall approach.

*The modern approach to drafting is to limit the **purpose** for which powers may be exercised and the **process** that must be followed when exercising them. That is they are much less prescriptive than older legislation. For example, this is the approach of the Local Government Act 2002.*

The "relatively flexible powers" under the proposed drafting instructions are "full capacity for the purpose of performing [Council's] role as a trustee of the Legal Town Belt". These will still be subject to:

- *The Local Government Act 2002;*
- *Compliance with the Management Plan; and*

- *Having regard to and seeking to apply the statutory principles in the proposed bill*

5.3.2 Leasing Powers: There are concerns about the current area leased to community groups and the proposed maximum area in the Drafting Instructions. If Council is serious about limiting development it should restrict the area that can be leased.

Also of concern is the length of the lease – maximum 33 years. Very few groups should be granted this because in many cases this enables an exclusive use of an area preventing public access.

Officers recommend no change. Area leased – the maximum area stipulated in the drafting instructions is the status quo (from 1908 Act). Officers recommend it not be lowered to just around the current area (around 6ha) to allow flexibility in the future. In particular if such facilities such as the golf course, and works depots are leased. The Reserves Act has no limits on the maximum area that can be leased.

Length of lease - 33 years is the maximum term in the drafting instructions (consistent with the Reserves Act 1977). For most groups, the standard lease tenure would be 10 years plus 10, as stipulated in the Leases Policy for Community and Recreation Groups (2012). Some leases are for longer tenures based on the investment of the lessee and their need for security of tenure so could be up to 33 years.

5.3.3 Interpret public recreation ground: Many submitters had concerns that any interpretation of “public recreation ground” as applying to circumstances as they arise will give too many powers to officers to make decisions that are contrary to the Deed.

The legislation could have a definition of “public recreation ground”

Officers recommend that consideration be given to defining recreation and recreation ground during the drafting stages of the bill.

5.3.4 Removal of Reserves Act: Submitters are concerned about the removal of the Reserves Act 1977 from the governance of the Town Belt. The Reserves Act provides additional protection eg an appeal process to the Minister about decisions made by the Trustees/Council. There is a lot of case law for the Reserves Act.

Officers recommend no change: Any relevant parts of Reserves Act are going to be included in the local bill. In place of sections 17 and 40 of the Reserves Act³, the local Act will require Council to have regard to and seek to apply the statutory principles. It is expected that the

³ Sections covering a) classification and purpose of reserves, b) management and control of reserves, c) functions of administering body

statutory principles will cover much of the same ground as section 17 ("Recreation Reserves"), including freedom of entry and access.

Officers have consulted with the Department of Conservation and they have no objections at this stage for removal of the Town Belt from the provisions of the Reserves Act.

5.3.5 The Deed should prevail: Several submitters have raised concerns that the Bill will prevail when there is inconsistency with the 1873 Deed. This is a major change from the current situation.

Officers recommend no change. The Deed has historical and social significance. Nevertheless allowing the Deed to continue as the legal framework of the Town Belt would significantly lessen the relevance and value of proceeding with a local Act.

Resolving disputes over what the Deed allows and ensuring that Council manages Town Belt land in accordance with the Deed creates ongoing risk and requires ongoing legal advice. A key purpose of the proposed local Act is to put an end to this. This purpose will not be achieved if the local Act must defer to the Deed.

Also relevant is that the Deed can be interpreted as providing Council with very broad powers to manage Town Belt land as it sees fit. If correct, then enacting legislation which prevails over the Deed will provide the community with stronger, not weaker, safeguards.

5.3.6 Making the local bill explicitly subject to the Public Works Act 1981: NZTA wants the Act to explicitly provide that it is subject to the PWA 1981 and empower the Council to enter into an agreement to sell land for a public work.

Officers are still assessing the implications of this proposal and will have a more detailed response and recommendations for the SPC paper in June.

5.3.7 Commercial activities should be prohibited under the new legislation: Some submitters opposed the Council being given the right in legislation to authorise leases or licences to commercial activities on Town Belt.

*The main difference between the current and proposed regimes to consider a commercial operation on Town Belt is the requirement under the Reserves Act 1977 that any lease for a "trade, business, or occupation must be **necessary** to enable the public to obtain the benefit and enjoyment of the reserve or for the convenience of persons using the reserve".*

Officers recommend a slight change to the drafting instructions to reflect this.

6. Conclusion

The draft Town Belt Management Plan 2012 was produced following a review of the 1995 Management Plan and 1998 Reinstatement Policy. It will provide strategic direction for the Town Belt for the next ten years.

The drafting instructions are the first stage in the preparation of a Town Belt bill to strengthen the protection of and modernise the governance arrangements for the Town Belt under the Town Belt Deed.

Public consultation has recommended changes to these documents. Following approval of these recommended changes officers will prepare a final plan and drafting instructions for approval by Strategy and Policy Committee and Council.

Contact Officer: *Mike Oates, Manager Open Space and Recreation Planning*

SUPPORTING INFORMATION

1) Strategic fit / Strategic outcome

The plan supports Council's overall vision of Wellington Towards 2040: Smart Capital. In particular it supports the Eco –city and people centred city outcomes.

2) LTP/Annual Plan reference and long term financial impact

The project is contained in the Council Plan A004 – Open Space Planning and its activities form part of the Community Environment Outcomes (section 2.2: provider and facilitator – green opens spaces [town belts]). There are no financial implications at this stage

3) Treaty of Waitangi considerations

The policies in the plan are consistent with the Waitangi Tribunal Report. "Waitangi Tribunal, Te Wanganui ā tara me ōna Takiwā: Report on the Wellington District 2003".

4) Decision-making

This is not a significant decision in terms of section 76(3)(b) of the Local Government Act 2002.

5) Consultation

a) General consultation

The Council has consulted on the draft plan and drafting instructions. A statutory 2 month consultation took place as required for the management plan under the Reserves Act 1977.

b) Consultation with Maori

Mana whenua have reviewed relevant sections and commented on the draft plan.

6) Legal implications

Council's lawyers have been consulted during the review of submissions particularly those relating to the drafting instructions.

7) Consistency with existing policy

This is a review of existing policies and will update and replace the Wellington Town Belt Management Plan 1995 and the Wellington Town Belt Reinstatement Policy 1998. The preparation of a Town Belt bill is consistent with current Council policy.