

Submission 170

From: Wellington City Council [webcentre@wcc.govt.nz]
Sent: Monday, 10 December 2012 3:43 p.m.
To: Megan Dunning
Subject: Town Belt Legislative & Policy Review - Submission

The following details have been submitted from the "Town Belt Legislative & Policy Review" form on the Wellington.govt.nz website:

First Name: Tom
Last Name: Huggins
Street Address: c/o Massey University
Suburb: Po Box 759
City: Wellington 6140
Phone: 801579962456
Email: T.J.Huggins@massey.ac.nz
I would like to make an oral submission in February 2013.
(Please provide your phone number for an oral submission.) Yes Your phone number: 801579962456 I am giving this feedback: on behalf of an organisation
Organisation name: Local Food Network

----- Section One - Draft Town Belt Management Plan -----

Overall, do you support or oppose the general direction of management for the Town Belt?

Neither support nor oppose

Why do you say this?

The plan proposes to protect an additional 85.03 hectares under the Town Belt Deed (chapter 2 of the draft plan). To what extent do you support or oppose this?

Neither support nor oppose

Why do you say this?

The plan proposes criteria for assessing land to be added to the Town Belt (chapter 2 of draft plan). To what extent do you support or oppose the criteria?

Neither support nor oppose

Why do you say this?

The plan proposes to restore and enhance ecosystems and increase the indigenous vegetation cover on the Town Belt (chapter 5 of draft plan). To what

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extent do you support or oppose this?
Neither support nor oppose

Why do you say this?

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?
Neither agree nor disagree

Why do you say this?

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?
Neither support nor oppose

Why do you say this?

1. Theme, sector, or policy and page number:

Comment

2. Theme, sector, or policy and page number:

Comment

3. Theme, sector, or policy and page number:

Comment

4. Theme, sector, or policy and page number:

Comment

5. Theme, sector, or policy and page number:

Comment

Do you have any additional comments?

The Local Food Network is keen to see more environmental education, community gardening and food growing activities (for teaching, modelling purposes) on the town belt, in particular horticulture and 'how to grow food' workshops.

As advocates for Wellingtonian's sourcing their food locally we see education and raising people's awareness around local foods environmental, health and community benefits as vital. The town belt is an accessible green area in the city and is the perfect place for education and hand on's on activities supporting people learning about local food.

A report overviewing the food sector in Wellington commissioned by the council this year states:

The Town Belt Legislative and Policy Review[1] outlines principles of how the Town Belt should be managed. Some of the principles developed relate to access to local food through, for example, food growing or gathering. These are:

- The Town Belt is for all to enjoy, and
- The Town Belt will be used for a wide range of recreation activities.

Food growing or gathering is an activity that could support the achievement of these principles by providing a wider range of activities that can be carried out in the town belt by a wider range of people.

We support this and want to also include environmental education as an important activity to enable a wider number of people to use the town belt and to increase awareness around local food.

----- Section Two - Proposed legislative changes -----

Do you support or oppose the overall objectives of the proposed legislative change?

Neither support nor oppose

Why do you say this?

1. Paragraph number:

Comment

2. Paragraph number:

Comment

3. Paragraph number:

Comment

4. Paragraph number:

Comment

5. Paragraph number:

Comment

Submission 183

From: Wellington City Council [webcentre@wcc.govt.nz]
Sent: Monday, 10 December 2012 4:23 p.m.
To: Megan Dunning
Subject: Town Belt Legislative & Policy Review - Submission

The following details have been submitted from the "Town Belt Legislative & Policy Review" form on the Wellington.govt.nz website:

First Name: Anthony
Last Name: Leaupepe
Street Address: 17 Tobago Crescent
Suburb: Grenada NOrth
City: Wellington
Phone:
Email: aumaga_saoao@hotmail.com

I would like to make an oral submission in February 2013.
(Please provide your phone number for an oral submission.) Yes Your phone number: 0221360276 I am giving this feedback: on behalf of an organisation
Organisation name: Clifton Terrace Model School

----- Section One - Draft Town Belt Management Plan -----

Overall, do you support or oppose the general direction of management for the Town Belt?

Strongly oppose

Why do you say this?

The council should leave the land accross the road from the school alone for safety reasons.

The plan proposes to protect an additional 85.03 hectares under the Town Belt Deed (chapter 2 of the draft plan). To what extent do you support or oppose this?

Support

Why do you say this?

The plan proposes criteria for assessing land to be added to the Town Belt (chapter 2 of draft plan). To what extent do you support or oppose the criteria?
Support

Why do you say this?

But disappointed that the land up in clifton terrace is not being considered to be included in the plan

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The plan proposes to restore and enhance ecosystems and increase the indigenous vegetation cover on the Town Belt (chapter 5 of draft plan). To what extent do you support or oppose this?

Support

Why do you say this?

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?

Agree

Why do you say this?

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?

Support

Why do you say this?

1. Theme, sector, or policy and page number:

The Crown-owned land at Clifton Terrace – the former

Comment

Land at Clifton Terrace should be included in the townbelt plan as a protected area given there is a school across the road. The crown might sell this section to developers in the future this will endanger the school and put children at danger.

2. Theme, sector, or policy and page number:

Comment

3. Theme, sector, or policy and page number:

Comment

4. Theme, sector, or policy and page number:

Comment

5. Theme, sector, or policy and page number:

Comment

Do you have any additional comments?

----- Section Two - Proposed legislative changes -----

Do you support or oppose the overall objectives of the proposed legislative change?

Support

Why do you say this?

1. Paragraph number:

Comment

2. Paragraph number:

Comment

3. Paragraph number:

Comment

4. Paragraph number:

Comment

5. Paragraph number:

Comment

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Submission 49

From: Maggy Wassilieff [maggy.wassilieff@gmail.com]
Sent: Thursday, 6 December 2012 10:56 a.m.
To: Megan Dunning
Subject: Comments from Maggy Wassilieff
Attachments: Town Belt MP.doc

Dear Parks& Reserve staff,
find attached my submission on the draft TBMP

Thanks,
Maggy W

Draft Town Belt Management Plan

Submission of Dr Margaret Wassilieff
69 Tiber St
Island Bay
Wellington

Summary

Key Point (Policies 5.5.6 – 5.5.13)

- ▲ Commence large-scale enhancement plantings of mature indigenous forest species throughout the Town Belt

Ancillary Points

Revise the Guiding Principle of Section 5 – Ecology

The emphasis needs to be on ecosystems not populations.

- ▲ *The Town Belt will support self-sustaining indigenous ecosystems*
- ▲ *Produce regular reports on ecological monitoring programmes to document trends & issues and to inform people. (New Policy 5.5.19)*
- ▲ *Produce signage interpreting the ecology of various habitats along the Town Belt (New Policy 5.5.20)*

Introduction

1. I am the author of the 1994 Background report on the Ecology of the Wellington Town Belt. I have been actively involved in plant restoration projects in and around the Wellington region for over 40 years. I have visited green belts/open space networks in many cities throughout New Zealand, Australia, S. Korea, Taiwan, Japan and Scotland.
2. My comments on the Draft Town Belt Management Plan are directed towards its ecology/biodiversity /restoration objectives and policies.

Mature Forest Tree Species

3. My key concern is that I can not see any provision for the restoration of late successional and climax native plant communities into the Town Belt. As stated in my 1994 report, most of the native vegetation on the Town Belt is simple in structure and composition. Although twenty years have passed since I undertook my field survey of the Town Belt's vegetation, that observation still holds. The Town Belt lacks the tree species that characterise mature (old-growth) native forest of Wellington.
4. These species are: rimu, kahikatea, miro, matai, totara, pukatea, tawa, titoki, hinau, black maire, kohekohe, nikau, tree fuchsia, rewarewa, kaikomako, putaputaweta, northern rata* and pigeonwood.
*(see para 11 on northern rata planting)

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5. Since I prepared my 1994 report on the Ecology of the Town Belt there have been 3 significant events that have a bearing on this issue:
 - effective possum control has been undertaken throughout Wellington City
 - some native bird populations have increased (tui, kereru) & some bird species have been reintroduced to Wellington (N. I. Robin, kaka)
 - numerous groups are undertaking restoration planting work throughout the City.
6. Most of the forest trees that are effectively absent from the Town Belt have seed that is dispersed by fruit-eating birds. Kereru (native wood-pigeon) are the principal dispersal agent of these fruit-bearing trees in mature native forest.
7. Although numbers of kereru have risen slightly in Wellington following possum-control programmes, their population is too small to have any effect on regeneration of mature forest species beyond the remnants of old-growth forest that they preferentially inhabit.
8. There is little to attract kereru into the Town Belt forests. The Town Belt lacks the food trees that kereru require and does not have roosting trees that kereru favour. The Council cannot rely on natural dispersal as the means to regenerate tall, complex biodiverse native forest on the Town Belt.
9. Consequently, Town Belt forests will persist as simple mahoe- or ngaio- dominant forests for decades, offering an unfavourable habitat for nectar-feeding and fruit-eating native birds, unless active enhancement planting is undertaken in the next few years.
10. The Draft TBMP proposes planting of tall tree species on Mt Victoria (policy 8.9.3.2). I support this; but there are many other sites suitable for enhancement planting of mature forest species on the Town Belt. The podocarp species, northern rata and rewarewa are fairly light-demanding and require decent-sized light gaps for rapid growth. The other species can cope with a degree of shading and may be planted within stands of young forest or shrub growth as long as they are sheltered from drying winds. It is not necessary to wait for late successional stages in which to establish tall tree species (see discussion in last para p.162).
11. I realise a mass planting of northern rata (estimated at 7500 plants) was undertaken on the northern end of Te Ahumairangi (Tinakori) Hill between 2005-2010. The Draft TBMP mentions that this has been a “reasonably successful” venture as plenty of rata have survived (p.69). My casual observation of the area on 4 December 2012 was that a number of rata on the upper slope were being overwhelmed by rank grasses, blackberry and buddleia. I could not access further downslope as the weedy growth was too dense. There were no rata visible above the young ngaio-dominant cover. It is apparent that weed release and follow-up care is still needed at this site, some 7 years after the first rata plantings were undertaken.
12. Growing northern rata as a terrestrial plant on the western Wellington Peninsula is a bit of an anomaly, for normally the tree commences life as an epiphyte on tall host plants (mainly rimu). As such, northern rata never formed a mono-species stand, but featured as a scattered emergent throughout mature forest along with other tall trees (rimu, hinau, tawa, kahikatea, black maire, miro, matai). I applaud the Council for trying to establish this tall forest tree in copious quantities, but would recommend that future plantings of tall forest trees be undertaken in a manner that is more representative of natural patterns of species distribution. This is what I mean by enhancement planting.

13. Similarly, I applaud the Council for undertaking the planting of 300 rimu and subsequently reporting that this restoration effort was not very successful (2nd bullet point p.69). Growing rimu can be difficult in Wellington, but it is by no means impossible (attested by the very exposed rimu tree I planted 32 years ago on my front lawn in Island Bay). Young rimu plants require adequate moisture during their first few summers. I seriously doubt that soil conditions were a factor in their poor performance on Te Ahumairangi (Tinakori) hill, as the trial plantings were in moist gullies. Weed competition and shading are probable explanations, and the reasons many plantings fail.

Recommended policy to insert (somewhere within Policy 5.5.)

- ⤴ Commence large-scale enhancement plantings of mature indigenous forest species throughout the Town Belt
- ⤴ Ensure follow-up care of plants is undertaken

Populations vs Ecosystems

14. The guiding principle for section 5 places emphasis on supporting healthy populations of indigenous biodiversity. A population is just a collection of individuals of a single species. It could be possible to have healthy populations of only a few species totally unrepresentative of populations that could potentially flourish on the Town Belt.
15. My preference is that the Council acknowledge the much wider role the Town Belt has in providing various ecosystem services and functions. (The Draft TBMP identifies a number of these ecosystem services/functions: habitat for indigenous animals and plants, food for native animals, corridors for animal movement, storm-water control, sediment capture, soil-nutrient cycling, carbon sequestration, recreational space for people).
16. As ecosystems by definition include populations and communities, a more encompassing guiding principle gives a truer reflection of the value of the Town Belt to the City.

Recommended Guiding Principle Section 5

- ⤴ The Town Belt will support self-sustaining indigenous ecosystems

Monitoring for whom and for what purpose?

17. As so much of the ecorestoration work in Wellington (and elsewhere in NZ) is being carried out by members of community groups, there is a real need for the Council to coordinate and share information about successful and failed plantings, successful and failed bird introductions, pest and disease outbreaks, etc. This will go a long way to ensuring that resources are not wasted and best practices are adopted in a timely manner.
18. In an ecological sense it is relatively meaningless to enthuse about the hatching of bird

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chicks, if those chicks do not go on to fledge, mate and raise offspring. Similarly, it is of little long-term value to report that 10,000 plants per year have been planted on Te Ahumairangi (Tinakori) Hill, if we do not know the survival rate of these plants over the first few years.

19. It would be a relatively easy exercise for each group that undertakes restoration plantings to check and report on the survival rate of their plantings after 1 year and perhaps at 3 years, when most plants should be above the height of weedy competitors. Council staff could do the same, monitoring and reporting on the success of their plantings.

Recommended Policy to add (Policy 5.5.19)

- ▲ Produce regular reports on ecological monitoring programmes to document trends & issues and to inform people.

Inform and educate

20. The Town Belt forms a great outdoor classroom for anyone interested in learning about Wellington's biodiversity/ecology. I would welcome a few noticeboards (perhaps the back of the track signage boards) that describe the local ecology of the site and contain photos/sketches of common plants and animals of the area. This would also be a good place to profile the work of the community restoration groups involved.

Recommended policy to add (Policy 5.5.20)

- ▲ Produce signage interpreting the ecology of various habitats along the Town Belt

Maggy Wassilieff 5/12/12

Ph: 383 6100

email: maggy.wassilieff@gmail.com

I would like to speak to my submission

(My preference would be to support my submission with a few photos/short power-point presentation, if that's possible)

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Submission 95

From: bevabbott [bevabbott@xtra.co.nz]
Sent: Sunday, 9 December 2012 1:26 p.m.
To: Megan Dunning
Cc: 'barbara clark'
Subject: Botanical Society's submission on Town Belt Mgmt Plan
Attachments: 20121209 Final submission Town Belt Mgmt Plan.doc

Hi there

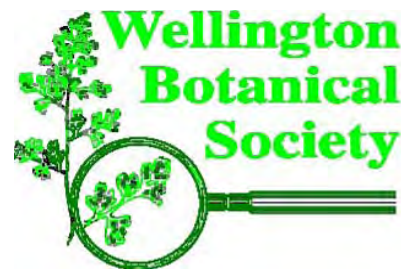
Here's Bot Soc's submission. Hope it's useful.

Sorry about the length - but some of the earlier versions were even longer.

Happy reading.

Bev

PO Box 10-412
Wellington 6143
New Zealand



Charities Commission Registration
CC10518

9 December 2012

DRAFT TOWN BELT MANAGEMENT PLAN

Submitter: Wellington Botanical Society

Contact details Bev Abbott

40 Pembroke Rd, Northland, Wellington 6012

bevabbott@xtra.co.nz

Phone 475 8468 (H)

INTRODUCTION

1. The Wellington Botanical Society (the Society) appreciates the opportunity to comment on the Draft Town Belt Management Plan and would like to present key points to Council at any hearings or workshops.
2. In brief, we think the Ecology chapter needs more specific guidance to inform decisions leading to long-term results. As an example, if Wellington wants to see populations of kererū breeding successfully on the Town Belt within the foreseeable future, we need to start planning to plant the trees that kererū will need for food and nesting sites. Relying on the current strategies may eventually achieve the same result, but progress will be slower.¹ One of our key recommendations is that the final plan includes much more specific guidance about strategies for successful enhancement planting with at least two more specific initiatives in the sector plans.
3. We have made some brief comments on two other chapters: partnerships (chapter 3) and recreation (chapter 6). The final section suggests improvements to the Introduction (chapter 1).
4. We expect that the final Town Belt Management Plan will:
 - be readily understood by the public as well as councillors and staff
 - have a vision and some clear objectives and milestones to measure progress
 - be comprehensive – because omissions may give rise to ambiguity and misinterpretation
 - provide a clear basis for improved accountability through policies that include the word “will”
 - permit some flexibility within prescribed limits through policies that include the words “should” or “may”.

¹ Current strategies include improved connectivity, natural regeneration and pest control of naturally regenerating areas.

5. Paragraphs in this submission that contain specific recommendations are tagged with the word "Recommendation".

THE OVERALL PLAN

Strengths of the Draft TBMP document

6. We liked the following features of the Draft TBMP as a document:
- the alignment with the Guiding Principles approved by Council in 2011 (other than principles 1 and 2)
 - the structure is helpful to people wanting information by topic (e.g. recreation) and people interested in specific places (e.g. Aro Valley)
 - the maps which are a rich source of information
 - the tables which clearly outline the arguments for additions of land to the Town Belt
 - the depth of information in Appendix 4.

Areas for improvement

7. Specific concerns include:
- there's very little sense of strategic direction or the long-term results Council is seeking – a governance responsibility
 - the section about the Town Belt concept does not adequately convey why proposals for developments on the Town Belt can meet more fierce opposition than developments on other open space
 - the lack of a summary of the Town Belt's values
 - several policies rely on policies and plans in other plans and documents which may change during the 10-year term of the next TBMP
 - some of the explanatory statements read like policies, but their role in decision-making is not explained
 - there is insufficient explanation about the purpose of the management plan, who will use it and how it will be used
 - the lack of information about the cost of core functions
 - inconsistencies in the language style of the objectives and policies
 - the lack of a glossary to explain the key terms used in the document.
8. Many of these matters could be resolved by changes to the Introduction. For example, a vision could be similar to the vision in Dunedin's Town Belt Management Plan 2007.

The Town Belt is protected, enhanced, extended, and well-managed under sustainable ecological principles as Dunedin's premier urban natural and recreational landscape located between the hill suburbs and the City centre.

ECOLOGY (CHAPTER 5)

Summary

9. Overall we think the final TBMP needs to provide decision-makers with much clearer direction for making decisions about the management of the Town Belt in the long term. Restoration is a long, slow process. As with Zealandia, the Council must think about the goals for the next 100 to 200 years, as well as rules and milestones for the next 5-10 years.
10. Positive features of the draft chapter include:
 - the commitment to using eco-sourced plants in all restoration work with native plant communities.
 - the commitment to supporting the involvement of community groups in restoration and revegetation programmes
 - recognition of the Town Belt's freshwater biodiversity in an objective and a couple of policies
 - recognition of the relationship between the Town Belt's ecology and the resilience of the city.
11. **Recommendation:** The chapter would benefit from:
 - a new Guiding Principle
 - a clearer vision of what Council wants to achieve in the longer term, and some key milestones for the next 10 years (the term of the plan)
 - a more comprehensive description of the current state of the Town Belt's ecology
 - explanatory text that will educate and inspire councillors, staff, residents and potential volunteers about the strategies leading to "restoration", particularly the role of ecologically appropriate plantings of native species
 - simpler objectives and new groupings of policies based on those in the Biodiversity Action Plan 2007.

What does the Guiding Principle mean in practice?

12. The chapter's Guiding Principle is that "The Town Belt will support healthy populations of indigenous biodiversity". This Guiding Principle was approved by Council in 2011.² The Guiding Principle comes with explanatory notes that refer to methods such as pest control and enhancing connectivity. The explanation doesn't give any sense of what will result from applying the guiding principle in the medium to long term.
13. One interpretation of the Guiding Principle is that a species is not just present on the Town Belt, but the size and structure of its populations are sufficient for the population to be considered healthy and self-sustaining. For high-level strategic and accountability

² In December 2011, Strategy and Policy received a paper reporting the results of the analysis of submissions on the draft guiding principles. Officers reported that the submissions showed that the term 'natural character' was too generic and that further definition was required on what natural aspects of the Town Belt were to be protected and enhanced. Council subsequently accepted officers' recommendation that this principle be replaced with two, more specific, principles to encapsulate the 'landscape' and the 'indigenous biodiversity'

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purposes, establishing which indigenous species fall into each of the following categories would assist in focusing effort and tracking progress over time.



How many species are we talking about?

14. Twenty years ago, at least 150 indigenous Wellington plant species could be found on the Town Belt. (Dr Maggy Wassillieff's report provides a useful baseline for monitoring future trends. She recorded 169 native plants in a 1991 survey of the Town Belt, of which 18 were deliberate introductions, i.e. plants such as karo not known to grow naturally around the Wellington region.) Our members have identified additional species since then, including an orchid. Overall there are around 600 plant species on the Town Belt (page 34).
15. Ensuring that there is at least one healthy population of each of these 150 plant species in at least one location on the Town Belt, would be consistent with the Guiding Principle. Many Wellingtonians, however, also want to see healthy populations of other indigenous Wellington plants on the Town Belt, particularly the species that were once common in the original Wellington forests but are now notably absent or very rare. Examples include rimu, tōtara, miro, kahikatea, hīnau, tawa, northern rātā, tītoki, pukatea, nīkau, tree fuchsia and black maire.
16. The number of indigenous species to be represented by healthy populations increases when other components of Wellington's indigenous biodiversity are included, e.g. birds, lizards, insects, other invertebrates, fungi, mosses, soil fauna, fish and aquatic invertebrates, etc. This diversity is inherent in policy 5.5.6 (b) "enhancing the species diversity of the Town Belt".
17. By focusing on populations of a large number of species that could be restored to the Town Belt, the Guiding Principle is not particularly helpful. If Council decides to retain the approved Guiding Principle, we recommend Council provide a clear explanation of what it means in the medium to long term, and how people will know that the Council's policies and programmes are working.
18. **Recommendation:** We recommend revising the Guiding Principle to focus on healthy ecosystems, for example: "healthy, self-sustaining indigenous ecosystems are once again flourishing in many parts of the Town Belt".
19. **Recommendation:** We recommend Council hold a workshop to give ecologists and others an opportunity to review the Guiding Principle and develop explanatory notes and objectives that would establish and communicate an enduring vision for the Town Belt's ecosystems and ecology.

Improving the description of the current state of the Town Belt's ecology

20. **Recommendation:** Section 5.2 about current state of the Town Belt's indigenous biodiversity should start with a more informative description of the current situation. This could include bringing together the following five statements which are currently scattered throughout the chapter to help future decision-makers understand the extent of the challenges that lie ahead.³
- probably 99.5% of the original forest cover has now been lost
 - podocarp and most broadleaf species are absent from the Town Belt
 - the plant communities are young and simple in structure, with a limited diversity of native species
 - the reduced diversity of native species in the plant communities, and their fragmentation, has resulted in a reduced diversity of species of indigenous fauna
 - pest plants and other weeds are a threat throughout the Town Belt and are a particular concern for small, isolated parts of it.
21. Other information we would expect to find in the description of the current status of the Town Belt's ecology (section 5.2) includes:
- an outline of the stages in ecological succession⁴
 - types of freshwater ecosystems, e.g. permanent streams, ephemeral streams and seepages on the Town Belt
 - an acknowledgement of the contribution that exotic forests make to the health of indigenous populations and species, (e.g. eucalypts as a food source for nectar feeders, and the orchids and ferns growing in pine forests).

Educating and motivating public participation

22. **Recommendation:** We support the general intent of the community participation objectives and policies in chapters 3 and 5, but offer some minor changes to improve the consistency of their wording and illustrate the use of "will", "should" and "may" in policy statements:
- Create a standalone objective from 5.4.2 stating: "Motivate, inspire and educate communities and businesses to engage in restoring the Town Belt"
 - Policy 5.5.8 - OK as is
 - Reword policy 3.2.2.1 as "Council will encourage the active participation by ..."
 - Reword policy 3.2.2.2 as "Council may provide opportunities for ..."
 - Reword policy 3.2.2.3 as "Council should establish Memoranda of Understanding (MOUs) with groups"
23. **Recommendation:** We also recommend adding two new policies as summarised in the table:

³ We've made small changes to the wording of the statements used the draft TBMP.

⁴ When vegetation is cleared from a Town Belt site, there is typically a short-lived phase when ferns and low-growing herbaceous plants colonise the site. After some time, shrubs emerge, Later on, young trees over-top the shrubs to form low forest cover. Eventually tall trees such as podocarps may emerge through the canopy of the forest. This process can take several hundred years. However, if the seed of a tall tree lands in a suitable microclimate courtesy of a passing bird or the wind, it may germinate and become established in an earlier stage of the natural succession.

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Proposed policy wording	Reason
Council will open up communication networks for collecting and sharing information about the indigenous biodiversity on Wellington's Town Belt.	<p>There are many unknowns about the most efficient and effective ways of restoring the Town Belt, including what may or may not be achievable.</p> <p>Council can't do this alone. It needs to provide opportunities for ecologists, foresters, soil scientists, other experts and the volunteers and staff who do the work on the ground to engage with each other and with Council.</p>
Council should ensure that budgets for event-based plantings such as Arbour Day include funding for least three years after-care.	The intent is to increase the likelihood that plants put into the ground during event-based planting initiatives will survive. On-going budgets may encourage participants to return to the site to assist with releasing and watering. It may also reduce the potential disappointment of participants, particularly children, who discover that their plants have died.

Ecology Objectives

24. **Recommendation:** The three, two-part objectives statements are cumbersome. We don't think objectives need to include reasons as these should be explained in the introduction. In proposing the following simplified statements, we've adopted the style of the objective statements used in the landscape chapter which all start with "to".
- 5.4.1: To protect and enhance the indigenous biodiversity of the Town Belt and ensure it functions as a well-connected ecosystem
 - 5.4.2: To restore and enhance the Town Belt's streams and indigenous freshwater ecosystems
 - 5.4.3 To gradually increase the role that indigenous vegetation cover on the Town Belt plays in the increasing the city's ecological connectivity and resilience.

Aligning the policies with the framework in the Biodiversity Action Plan 2007

25. In 2007, Council approved an excellent Biodiversity Action Plan with a vision and pathway based on four processes: Identification, Protection, Restoration, and Research. We think that these four headings would provide a more logical framework for the policies in the ecology chapter than the current headings. The following three pages provide some early suggestions of how this could be achieved.
26. Identification policies: Policy 5.1 recognises the need to identify the ecologically important areas on the Town Belt. The maps do a good job of this. Next phases of the identification work programme need to focus on identifying:
- the relative health and potential of the main indigenous forest types (the 1991 background report lists the different types of indigenous-dominated forests on the Town Belt)

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- the main types of freshwater ecosystems found on the Town Belt, their key locations, and an assessment of their current state⁵
 - areas representative of the indigenous biodiversity of the central city to support policy, 5.5.16 (a)
 - locations which do or could support a rare or threatened species to support Policy 5.5.13.
27. **Protection policies:** Pest and weed management is arguably the most effective action Council can take to protect terrestrial populations of indigenous biodiversity on the Town Belt.
28. There are currently two pest management policies. Policy 5.5.15 refers readers to Council's Pest Management Plan (2004). Policy 5.5.16 identifies priorities for additional pest management activity as resources allow. Only two of the management sectors have policies that mention animal and plant pest management. We did not attempt to unravel what these animal and plant pest management policies mean in practice.
29. **Recommendation:** We recommend adding two policies:
- to promote mutually responsible relationships with adjacent landowners
 - to continue to work closely with Greater Wellington Regional Council to optimise the benefits of a joint approach to pest management on the Town Belt. (Greater Wellington has played an important role in reducing the impact of possums on vegetation, and in starting to create safe habitat for native birds from Zealandia.
30. **Restoration policies:** Governance and management of "restoration" is one of the key challenges facing Council at this time. We have already suggested changes to the Guiding Principle, the objectives and the framework for policies. We now turn to the clarity and wording of the policies.
31. We found some clear policies in the sector plans, for example:
- policy 8.6.3.1 ... establish a coastal forest cover on the higher ground on the eastern and western ridges (could be reworded as increase the number of coastal and semi-coastal species with healthy populations on the Town Belt by allowing scrubland in the golf course / Mt Albert sector to return to coastal native forest)
 - policy 8.4.3.1 ...increase the habitat available in the Brooklyn Hills for species requiring moister conditions
 - policy 8.9.3.2 includes ..ensure succession planting of taller tree species
 - policy 8.1.4.2...trial enhancement planting with successional species on the west-facing slopes.. . (we suggest replacing 'successional' with 'taller tree species).
32. More generally, however, we found the policies, criteria and terminology confusing as illustrated by the following bullet points.
- Policy 5.5.6 presents criteria for prioritising Council's indigenous habitat restoration work but these differ from the criteria for prioritising revegetation in policy 5.5.13. Policy 5.5.10 links decisions about Council's support for community revegetation and restoration programmes to the Biodiversity Action

⁵ Assessment criteria include water quality, barriers to natural flows, composition of macro-fauna, weediness, state of riparian vegetation, vulnerability of channel to erosion during high intensity storms)

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Plan 2007. Policy 5.5.16 introduces some new criteria for additional pest management if resources allow.

- The notes in section 5.3.1 state that priorities for restoration are developed at a city-scale in accordance with the Biodiversity Action Plan 2007. Our attempts to discover what this may mean for the Town Belt resulted in frustration.⁶
 - There is no generic policy about enhancement plantings. Explanatory notes signal that opportunities for ecological enhancement plantings need to be assessed on a case-by-case basis and will need to be informed by ecological research. In our view, sufficient information is available to plan and implement successional plantings with taller tree species.
 - Opportunities for enhancement plantings appear to be subject to a constraint – that projects will be dictated by the speed and location of pine-tree removal. In our view, enhancement planting can be done within existing ecosystems; it doesn't require cleared areas.
33. **Recommendation:** Our first recommendation for improving the clarity and relevance of this section is to ensure that the chapter presents clear explanations of all the different terms used to refer to restoration and planting projects, (e.g. restoration, revegetation, natural revegetation, increasing indigenous vegetation cover, establishing vegetation linkages, amenity planting and ecological enhancement planting, return slopes to native forest). The second suggestion is to apply this terminology consistently throughout the plan. Clarity and consistent use of terminology will help operational staff understand how they are to implement sector policies such as: “restore upper slopes to native forest”.
34. **Recommendation:** We recommend adding text about restoration options and challenges to the Issues and Opportunities section of this chapter to help decision-makers understand the critical success factors and time frames. For example, one option for establishing self-perpetuating native forest would be to plant, and then care for, thousands of young rimu, hīnau, tawa, tītoki, miro, mataī, tōtara, kahikatea, pukatea, fuchsia, kohekohe and nīkau on blocks of land where pines and conifers have been removed. Another option would be to rely on bird and wind dispersal of seed from seed sources such as the Botanic Garden, Otari-Wilton's Bush, Zealandia, Trelissick Park, Huntleigh Park, Khandallah Park and private gardens.
35. We identified five main management options for the restoration of terrestrial indigenous ecosystems in the draft TBMP. If we are correct, it may be useful to present these options and associated implications in the introduction to the chapter:
- controlling animal and plant pests to protect the natural growth and succession of current indigenous ecosystems (protecting the best of what remains)
 - supporting natural succession processes after pine and other exotic tree species removal by controlling animal and plant pests (as illustrated in the photos on page 37)

⁶

Action 3.1.1 in the BAP referred to implementing restoration programmes developed under objective 2.1 and 2.2. That led us to 13 more actions. The most relevant seemed to be Action 2.1.5 which proposed creating ecological management plans for all areas of ecologically significant public land as identified in objective 1. That led to another six proposed actions. We do not know if these have been completed.

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- planting natives en masse as blocks of hazardous exotics are removed and then actively caring for them for several years
 - undertaking enhancement plantings of existing simple forests with the taller tree species
 - organising events and supporting community groups to put plants in the ground to achieve public awareness, restoration, revegetation and amenity goals.
36. Given the importance attached to 'connectivity' in the draft, we'd also like to see details of some specific initiatives to improve ecological connectivity. Adding existing adjacent reserves to the Town Belt doesn't necessarily enhance ecological connectivity because habitats and populations on such reserves are already protected and connected.
37. We would value opportunities to workshop Council's restoration strategies and plans with staff, independent ecologists, and key interest groups.
38. Research policies: We support policy 5.5.18 which states: "The Council shall ensure that the ecology of the Town Belt is represented in city-wide monitoring programmes, and that monitoring is carried out in accordance with the Biodiversity Action Plan 2007".⁷ If any Town Belt monitoring programmes have already been established, we suggest including details about the indicators and any key findings of trends to date in the introductory text of the Ecology chapter. Reporting on the results of monitoring programmes can have a powerful motivating effect on workers and funders.
39. We would encourage Council to maintain accurate records of "event" plantings such as Arbor Day plantings with a view to developing a better understanding of how best to achieve their objectives. Ecological variables include the choice of locations, the selection of species and how best to cater for the care of the plants in the short and medium term. The 2005 planting of thousands of northern rātā seedlings on Te Ahumairangi provides a useful case study. The draft TBMP reports (page 69) that "plenty survive and weed control will continue...but there are no plans for more plantings in this area". As a basis for securing the future success of this high-profile initiative, we recommend recording in the final TBMP the actual number of northern rātā planted on the site and the numbers present in 2012. Members visiting the site in early December 2012 concluded that continued releasing of plants is required, given the invasion of weeds such as grasses, gorse and blackberry onto the site in recent years.
40. Research, however, is about more than monitoring and case studies. Much of Wellington's current ecological research takes place in the fenced settings of Zealandia and Wellington Zoo. We believe that Council should also invest in ecological research associated with restoring unfenced urban habitats. As examples, a better understanding of kererū flight patterns may assist in identifying where podocarp seeds are likely to be dropped in reasonable quantities. So too would information about locations where wind dispersal of tree seeds from the Botanic Garden, Otari-Wilton's Bush, Zealandia, Trelissick Park, Huntleigh Park and Khandallah Park has already resulted in new populations on Town Belt sectors. Other research questions include the relationship between the potential for podocarp restoration on sites where the soil ecology has been impacted by farming and fires. One researcher has suggested that addressing soil biology issues early in restoration planning, and removing barriers to natural regeneration wherever possible, may be more cost effective than forcing expensive plantings on sites that are inadequately prepared.

⁷ Monitoring actions in the Biodiversity Action Plan are in 4.1.1, 4.2.1, 4.2.2, and 4.2.3,

41. **Recommendation:** Research doesn't have to be formal or based in institutions. Practical experience can make an important contribution. We recommend Council provide regular opportunities for its own staff, regional restoration groups and private gardeners in compile and exchange practical information about the establishment of large indigenous tree species in Wellington conditions.

Ecological Issues and Opportunities

42. **Recommendation:** We recommend creating a separate heading to bring together all aspects of Town Belt management that have implications for the resilience of the city. This needs to explain that all naturally vegetated areas on the Town Belt (i.e. both exotic and indigenous) contribute to increased resilience through sequestration of carbon, reduced severity/risk of flooding, and reduced sedimentation in the harbour. We suggest placing more emphasis on the direct benefits of planting trees in preference to the emphasis in the draft on the ETS (section 5.3.3).
43. **Recommendation:** We recommend adding three additional topics to the Issues and Opportunities section.
- the future balance of indigenous and exotic vegetation
 - planning of large tree species
 - controls on planting trees on the Town Belt
44. **The future balance of indigenous and exotic vegetation:** A visionary statement in the 1995 TBMP proposed changing the vegetation balance from the existing 20 per cent native to 60 per cent over a 50 to 100-year period. This measurable target appears to have been dropped.
45. Policy 4.3.10 in the landscape section states that areas of exotic forest will be removed over time as trees fall or become hazardous. Maps use phrases such as 'long-term removal of pines' or 'gradual removal of conifers'. The time scales for removals in some sectors are tagged with conditions such as "There are no plans for major tree removal over the next 10 years unless there is major storm damage". This left us wondering what if any conifer/pine removal is planned for the next 10 years.
46. **Recommendation:** We recommend that Council reinstate formal targets and milestones for the replacement of conifers/pines with indigenous species and habitats.
47. **Planting of large tree species:** We did not find any explanation of the "mature-tree framework" which is referred to in policy 4.3.12. Is this about specimen trees in park-like settings? Is it about trees along roads through the Town Belt? Is it about pine forests?
48. Policy 4.3.13 in the landscape chapter is about the planting of new and replacement large tree species (both native and exotic). We recognise that conflicting values and perspectives will arise when the time comes to remove/replace large trees or clusters of specimen trees.⁸ The policy, however, seems to be to leave such decisions to the

⁸ The introductory section of the landscape chapter notes that "...a particular tree may have heritage value due to its age or location, cultural value associated with its use, ecological value as habitat, aesthetic value, practical value as shade, or even value associated with a memory of an event in someone's life.

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discretion of the Council of the day. (see Footnote 9, page 32).⁹ It is not clear if such decisions may be made by staff acting under delegation without any public consultation, or if such decisions will be referred to the Strategy and Policy Committee.

49. **Recommendation:** We recommend including an explanation of the mature-tree framework and the associated policy, preferably without using the word “framework”.

Controls on planting trees on the Town Belt:

50. Recommendation: We recommend Council explain its reasons for treating planting trees as a managed activity, and for limiting commemorative plantings to specific locations. We think the emotional connection established with trees that people have chosen to plant may result in more-enduring follow-up care. It is also possible that many surplus native seedlings from private gardens could contribute to the restoration of the Town Belt under a more supportive policy framework.

Landscape and ecological management policies in sector plans

51. The management plans for all nine sectors contain notes and policies about the management of the sector’s ecology and landscape. Our comments are summarised in the following table.

Sector	Policies supported	Other comments
Te Ahumairangi	All	This appears to be one of only two sectors with a policy that commits Council to animal pest control and the control of exotic weeds. The other is Mt Victoria / Matairangi. We also see a contradiction between landscape policy 8.1.3.3 which refers to gradually removing the wilding pines from the western slopes, and the statement that the removal of the wilding pines is not a high (ecological) priority. We disagree with the intention to delay dealing with the wilding pines in the Western Slopes Reserve. Early removal will be less expensive for Council and ratepayers in the long term. “ <i>One year of seeding, seven years weeding</i> ”.
Kelburn Park	8.2.3.1 8.2.3.4	
Aro Valley / Polhill Gully	8.3.3.1 8.3.3.2 8.3.3.4.	Improvements to the health of this sector’s indigenous biodiversity will improve the ecological connectivity with adjacent areas such as the Waimapihi Stream catchment, Zealandia and the Outer Green Belt. We urge Council to review the low priority assigned to pest animal and weed control, including weed management of the replanted natives above Norway St.
Brooklyn Hills	8.4.3.1 8.4.3.2 8.4.3.5.	The moister gullies are likely to be a site of ecological importance where it may be possible to establish some of our “lost” species.
Macalister Park		The wording of 8.5.3.2 indicates that it may be a long time before any native plants are well-established on the slopes in this sector.

⁹ Footnote 9 says: This assessment is at the discretion of the Council in its management of Town Belt reserves and reflects the need for the Town Belt to provide for a large-tree framework in the city landscape.

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Golf Course / Mt Albert	8.6.3.1 8.6.3.2 8.6.5.1	The potential for much of the scrubland in this sector to return to semi-coastal native forest may help increase the number of species with healthy populations on the Town Belt
Newtown /Crawford Rd		
Hataitai Park	8.8.3.1	
Mt Victoria / Matairangi	8.9.3.2 8.9.3.3 8.9.3.4	This appears to be one of only two sectors with a policy that commits Council to the control of animal and plant pests Was this intentional?

Additions to the Town Belt

52. We strongly support the Council's intention to add natural areas to the Town Belt where these help restore the horseshoe, e.g. Stellin Memorial Park. This position is based on the historical importance of the Town Belt concept.
53. We urge Council to find ways of protecting the green link between Te Ahumairangi Hill and the Botanic Gardens on the privately owned undeveloped land below Stellin Memorial Park (Row 1 of the Table on page 76). These areas are part of the horseshoe. Solutions may involve the adjacent reserve land. Recreational use may be challenging, but the visual and landscapes benefits when viewed from the Botanic Gardens/Met Office is worth protecting.
54. We are not identified any additional benefits that would result from adding "non-horseshoe reserves to the Town Belt even if they are adjacent to it. An example is the Western Slopes Reserve between Te Ahumairangi and Otari Wilton's Bush. As long as the Western Slope Reserve is protected, it may be administratively cheaper for such areas can be "managed as Town Belt" as is proposed for Aro Valley/Polhill Gully/Waimapihihi Stream Catchment and George Denton Park (page 92 refers). We don't see that changing the boundaries adds any connectivity benefits.

SOME BRIEF REACTION TO OTHER CHAPTERS

Chapter 3: Partnership and community participation

55. We endorse the decision to cover the two "relationship" Guiding Principles in the same chapter, i.e. Council's relationships with mana whenua and Council's relationship with the public.
56. **Recommendation:** We recommend deleting the words "and development" from the draft Objective 3.1.1 because the Guiding Principle refers only to management.
57. We support the intent of policy 3.1.2.4 which requires Council and mana whenua to meet annually to review and report on the performance of the past year and the proposed work programme for the following year. The associated reports, when released to the public, will improve public understanding of the contribution that mana whenua are making to the management of the Town Belt.
58. Section 3.2 about "Community participation" focuses on "hands-on" operational participation such as habitat restoration, recreation development, and running events.
59. **Recommendation:** We recommend expanding the text to include involvement in research and submissions.

60. **Recommendation:** We recommend adding a new policy to section 3.2.1 along the following lines:
- To report to the public at least annually on progress towards key objectives in the Town Belt Management Plan and any associated activities.*
61. Over the last decade, public expectations of accountability and transparency have increased, and Council has introduced more specific reporting requirements for its CCOs and grant recipients. We think that Council, as the governing body should be receiving more regular information about the Town Belt, and that this information should be available to the public. Establishing a small number of key results may provide a focus for such reporting. Potential topics include:
- land taken by Crown and compensation received
 - improvements in access to Town Belt from the CBD and suburban streets
 - the number of encroachments resolved and nature of resolution
 - survival rates from enhancement initiatives e.g. northern ratā plantings
 - land additions, removals and rationalisations (by sector)
 - revenue from leases and decisions on new concession applications
 - matters discussed at meetings with Friends of the Wellington Town Belt.

Chapter 6: Recreation

62. We support policy 6.6.5 which protects public recreation and public participation. We were disturbed to read of clubs wanting to limit use by casual users to protect the turf of specialist surfaces. One of our members was recently prevented from crossing Town Belt land by the new fence around Wakefield Park.
63. We support policy 6.6.2 which limits the development of existing facilities and the building of new ones to the existing footprints of sport and recreation parks and/or current leases areas and associated hard infrastructure.
64. **Recommendation:** We recommend reversing the order of the sections within section 6.4 (Sporting Infrastructure) so that the chapter starts with the infrastructure and activities that are most closely aligned with the original Town Belt concept (e.g. walking) and end with those that deviate from it to the greatest degree (the provision of elite sporting facilities where casual public access may be restricted to protect playing surfaces, and to host international events).
65. **Recommendation:** We recommend deleting draft policy 6.6.1 which states: “Ensure the availability of a diverse range of sporting and recreation opportunities that satisfies the needs of citizens and visitors”. Our reasons include:
- The policy creates an expectation that all recreational and sporting activities that are valued by some citizens and visitors will be allowed on the Town Belt, including activities that may be potentially dangerous to other users, e.g. rifle ranges, quad bikes
 - Council does not have to satisfy or even cater for the (recreational) needs of all citizens and visitors on the Town Belt. Some needs can be met on other Council land or on private land. Just 390 hectares of the Town Belt remains. Council manages 4,000 hectares of open space/reserve land.
 - Council does not need to adopt the policies of previous Councils who failed to acknowledge that the Town Belt land was gifted to the people of Wellington for use as open public space with no buildings.

66. **Recommendation:** We recommend alerting readers to the restrictions on sporting and recreational activities allowed on the Town Belt which are in chapter 9 (Rules for use and development)
67. Recommendation: We think interpretation about the natural values of the Town Belt adds an important dimension to visits to the Town Belt. We recommend Council either (a) ensure that the definition of “heritage” in policy 7.5.9 is sufficiently wide to include ecological values, or (b) add a generic “interpretation” policy to the recreation chapter.

SUGGESTIONS FOR RE-WRITING THE INTRODUCTION

The purpose of the Town Belt Management Plan

68. We think the introduction needs to start with a clear statement about the purpose of the Management Plan, who will use it and how it will be used. The current draft introduction (pages 2 and 3) contains two relevant statements:
- The purpose of the TBMP is to provide the WCC with a clear framework for making decisions and managing the Town Belt for the next 10 years.
 - The objectives and policies in this plan explain the intended methods for the protection, management, development, operations and public use of the Town Belt.
69. Council may also wish to adopt or adapt some of the following ideas from the Dunedin Town Belt Management Plan.

Management plans establish a series of objectives and policies for the management and, where relevant, the development and use of reserves, with the aim of resolving any conflict over competing uses and expectations, while taking into account the long-term needs of both the reserve and the community. The primary purpose of such strategic planning for Council’s reserves is to ensure environmental and economically sustainable management of reserves and their values for the people of Dunedin and visitors to the City.

Management Plans provide guidelines for future decision- making, ensuring consistency and balance.

The aims of a management plan must be able to stand the test of time and should require little in the way of amendment even when the plan is reviewed. The aims are related to the classification and purpose of the Reserve. They provide a framework within which any future proposals for development/enhancement, or any other form of action that may have an impact on the reserves, can be considered.

A management plan also provides Council with efficiency gains in the management of the reserve by not requiring further public notification or ministerial consent for matters that would otherwise require such public notice.

Improving the explanation of the Town Belt concept

70. Section 1.1 of the draft TBMP has the heading “The Town Belt concept”. Eighteen pages later, the same phrase is incorporated into an objective.¹⁰

¹⁰ Objective 2.8 states: To protect and enhance the Wellington Town Belt in a consistent manner that strengthens the Town Belt concept and continuity.

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71. The current explanation of the concept has two major weaknesses:
- it fails to capture the special nature of many residents' relationship with the Town Belt
 - it strays into a wider discussion about the current value attached to open space in the city.
72. Different understandings of the concept of the Town Belt underpin the passion and sometimes, the sense of betrayal of trust that arises when some residents consider that Council is compromising the essence and commitments in the original gift and deed. This sense of ownership underpins opposition to the Government taking land for roading, encroachments by private residents, the Council taking land for indoor sports facilities, and clubs wanting to fence their special sports fields to protect the surfaces from casual users.
73. In our view, the essence of the Town Belt concept has two components, and both need to be conveyed in this section:
- it is of a horse-shoe shaped area around the city that provides free recreational opportunities in natural settings for the city's residents
 - it is also a key part of the heritage passed down by the colonial settlers, and is part of the heritage we will pass on to future generations.
74. **Recommendation:** Providing a clear and enduring statement about the original Town Belt concept that will help all parties understand why decisions about uses of the Town Belt may meet more fierce opposition than the taking of other open space within the city's boundaries. Please include comparative area information, i.e. the Town Belt occupies just 390 hectares of the 4,000 hectares of open space and reserve lands managed by Council.
75. **Recommendation:** Place the objective that refers to the Town Belt concept (2.8, page 19) much closer to the explanation of the concept. Some additional explanation of the objective would be helpful. (What does 'strengthen' mean? Consistent with what? Consistent across what?)

Add a new section summarising the values of the Town Belt

76. The introduction needs a clear and comprehensive list / summary of the Town Belt's values. The assessment criteria on page 19 for the addition of land to the Town Belt provide a useful starting point.
77. A paragraph on page 2 notes that while the concept of the Town Belt has endured during the development of the city, its values have changed and continue to evolve as the value and potential values of open space in the urban environment are more widely debated and understood. We think there are at least three stages in this evolution of these values:

Value	Examples
Original values	open space, forests, walking, picnicking, views, picking wildflowers, collecting firewood
More recent values that are compatible with the original Town Belt concept	indigenous biodiversity, mountain-biking, open sports fields, the zoo, outdoor tennis courts, golf courses, historical heritage, exotic vegetation, carbon sinks, biophilia
More recent values that are not necessarily compatible with the original concept but may be acceptable today	Indoor/enclosed sports facilities Being able to buy commercially-provided coffee and cake at Wellington Zoo.

because the decision was made some time ago	
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78. **Recommendation:** Add a new section that describes the original values of the Town Belt and how these have evolved, as the value and potential values of open space in the urban environment have been more widely debated and understood.

Implications of other planning documents (Section 1.5)

79. Section 1.5 identifies other plans and policies that “give guidance in the development of this plan”. The text includes information about the intent of each plan, but rarely identifies the implications for the TBMP.
80. **Recommendation:** The list of plans in section 1.5 is not complete.¹¹ There are references to other plans in the draft TBMP. We recommend just listing the relevant plans and policies in chapter 1 (or 2), and addressing the implications in the most relevant section of the TBMP.

Other new topics for the Introduction

81. We suggest including some recent high-level financial information at the end of the introduction for a dose of reality. Citizens may develop a better understanding of the trade-offs decision-makers have to make if they have access to information about the cost of core functions such as mowing grass to maintain amenity and recreation values, the cost of the control of pest animals and plants to support new plantings, and the revenue earned from leases.
82. We suggest providing more information about any major decisions that will need to be made during the next 10 years, (e.g. seek legislative change to the Town Belt Act ; reach agreement with Crown over land that may be taken for roading, find more effective ways of engaging community groups and businesses in the management of the Town Belt).
83. We suggest including high level information about encroachments in this section (from section 9.6.9) and adding a specific objective to resolve all identified encroachments during the term of this Management Plan. Refer readers to section 9.6.9 for policy details.
84. We question whether Council has a mandate to abandon its grievance with the Crown on behalf of the citizens of Wellington. If section 2.5 about the 1998 Reinstatement Policy is to be dropped from the final version of the plan, please ensure its contents are captured in Appendix 4.

¹¹ Others included Vegetation Priority and Removal Plan, the Pest Management Plan 2004, and Guidelines for Community Gardens.

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Submission 96

From: bevabbott [bevabbott@xtra.co.nz]
Sent: Sunday, 9 December 2012 12:01 p.m.
To: Megan Dunning
Subject: Submission of proposed legislative changes re Town Belt
Attachments: 20121207Drafting instrctions Town Belt.doc

Here's a personal submission on the proposed legislation. It's not been discussed with any of the groups I work with.

Bev Abborr

Bev Abbott
40 Pembroke Rd
Northland 6012
Phone: 475 8468

9 December 2012

TO: WELLINGTON CITY COUNCIL

DRAFTING INSTRUCTIONS FOR TOWN BELT LOCAL LEGISLATION

1. Thank you for the opportunity to comment on the drafting instructions. My submission is in two parts. The first part raises questions about aspects of the “modernised governance arrangements” for the Town Belt other than the legislation. The second part comments on specific drafting proposals.
2. The essential argument is that the legislation should not be developed in isolation from consideration of other elements of the governance system.
3. I would like to speak to my submission at any hearings.

Part One: Governance arrangements

4. Council has identified three primary purposes of the proposed Bill. One of these is to “improve and modernise the governance arrangements for the Town Belt”. I believe that Council and the public need a wider discussion about the opportunities for *modernising governance arrangements* before Council proceeds with designing the legislation that will underpin the future governance arrangements. I reached this view after considering the following:
 - Council has acknowledged that it wants *relatively flexible powers*.
 - Council has identified two constraints on those powers.
 - the charitable purposes of the Town Belt Deed, but the discussion document did not offer any explanation of what that means in practice.
 - the requirement for consistency with the management plan in force at the time.
 - There is very little information about the proposed form of the management plan in paragraph 25 of the drafting instructions for the new legislation.

- Removal of the Reserves Act requirements opens up the possibility of introducing a very different style of management plan. The Town Belt Management Plan to be passed in 2013 is likely to contain at least 200 pages. Would *modern governance arrangements* generate a management plan of a similar size and style? Does it have to be a 10-year management plan?
 - Are there other forms of planning document that could be used to guide strategic and operational decision-making for the Town Belt? Do we need a planning document that would facilitate improved monitoring of performance and results?
5. If Council is serious about improving the governance arrangements for the Town Belt, I recommend that it postpones development of the Bill to allow time for a discussion of the current and proposed governance arrangements. The discussion could address questions such as:
- What are the key components of a good governance system?
 - How do the current Town Belt governance arrangements operate?
 - How do the Town Belt arrangements compare with the governance arrangements for other parts of Council's land, e.g. recreation services, the Botanic Garden, Basin Reserve, Wellington Zoo, and?
 - Why does Council operate such different systems?
 - How satisfied are the public and councillors with the current governance practices for the Town Belt?
 - Are the current delegations appropriate, i.e., are all decisions made at the most appropriate level
 - Does Council receive the information it needs to review the Chief Executive's performance in managing the Town Belt?
 - Can we learn anything from other urban councils?
6. If the public is going to support new legislation, we need to be sure that it is part of a governance system that will protect the essence of the Town Belt and ensure that it is well-managed. The legislation should not be developed in isolation from other elements of the governance system.

Part Two: Comments on drafting instructions

7. My comments on the drafting instructions are set out in the table on the following pages

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Section	Comment
2	Four good definitions. Pleased to see reference to Original Town Belt. Consider adding a definition for “reserve land managed as Town Belt”.
3.1	<p>Guiding Principle 5 should not be enshrined in legislation without further advice from ecologists and potentially further public consultation. Guiding Principle 5 states “The Town Belt will support healthy populations of indigenous biodiversity”.</p> <p>Council approved this wording in December 2011 after considering officers’ advice that submissions on the draft guiding principles showed that the term ‘natural character’ was too generic and that further definition was required on what natural aspects of the Town Belt were to be protected and enhanced. Council accepted officers’ recommendation that the previous principle be replaced with two more specific principles to encapsulate the ‘landscape’ and the ‘indigenous biodiversity’.</p> <p>In late 2012, as part of consultation on the draft Town Belt Management Plan, the Wellington Botanical Society and others raised concerns about this Guiding Principle and suggested alternatives based on ecosystems. Other submitters may have thought that there was no point in commenting on the guiding principles because they had been approved by Council.</p> <p>The wording of sections 3.1 and 14.2 does provide some flexibility for those drafting the bill to use phrases such as “healthy, self-sustaining indigenous ecosystems are once again flourishing in many parts of the Town Belt”.</p>
3.4	<p>I have concerns about legislation that would provide Council with “relatively flexible powers”. The two constraints on those powers do not provide sufficient reassurance. The following examples illustrate some aspects of this concern.</p> <ul style="list-style-type: none"> ▪ Drafting instruction 14.4 proposes allowing Council to lease up to 40 hectares of Town Belt. There were no details of the total current area leased in the FAQs. ▪ Some of Council’s intentions about the future of the Town Belt are evident in the draft TBMP through statements such as: “However, elite sport and associated events are important to Wellington as a destination for major events, entertainment, and also to provide a pathway for talented you people to develop their skills and develop a careers in elite or professional sport. Such sport can sometimes bring in external funds to improve facilities that can in turn benefit community sport”. <p>I expect Council to show more respect for the original Town Belt concept as it is part of our heritage. Council controls 4,000 hectares of open space/reserve land and under future amalgamations, may become responsible for more land and other sporting infrastructure. On the Town Belt, public use has to take priority over specialised uses. Specialised uses can be catered for on other reserves, on private land or elsewhere in the Wellington region where they may generate a useful income for the landowner or neighbouring councils.</p>
5.	Agree

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7	Agree with 7.1, 7.2 and 7.3.
8.1	<p>This instruction needs further consideration as there may be efficiency gains in adding the Basin Reserve to the Town Belt and defining it as a special area. The Deed shows that the Basin Reserve is for the purposes of a cricket and a recreation ground.</p> <p><i>A Deed of Conveyance of the Basin Reserve between the Crown and the Governor-General of New Zealand to the Wellington City Council was approved in 1884 that established that the ground was to be "forever used for the purposes of a cricket and a recreation ground by the inhabitants of Wellington".</i></p> <p>The same arguments that are being applied to the definition of 'public recreation ground' on the Town Belt could be applied to the Basin Reserve as long as the ground is still available for cricket.</p>
8.3	<p>This instruction needs further consideration. The legislation for the Botanic Gardens was passed in 1891. Is it still fit for purpose? If not, which would be the better option – updating the present Act or repealing the Act and incorporating the Botanic Garden as a special area in the Town Belt?</p>
9	<p>Support in principle but suggest including criteria for establishing whether a proposed change is or is not "minor" in the legislation. Such decisions should not be left to the discretion of managers or the Council of the day.</p>
10	Support
11	<p>I can only guess at the meaning of the phrase "to forever hereafter use and appropriate the Legal Town Belt as a public recreation ground...".</p> <p>I oppose the intent to interpret the term "public recreation ground" to circumstances as they arise. Section 1.1 of the Town Belt Management Plan notes that open space in the city is essential to the physical, emotional and social health and well-being of its people. Public open space is becoming an increasingly rare resource in the inner city as the population grows and more land vanishes under buildings, roads and carparks. By not adhering to the original meanings of public recreation ground, Council exposes future residents to the risk of further losses of public open space, particularly if up to 40 hectares of Town Belt land could be leased for sporting infrastructure.</p> <p>The new legislation provides an opportunity to introduce an enduring definition of public recreation ground. I suggest wording the new definition around activities that are "allowed" in Section 9 of the draft TBMP supplemented by some of the "managed" activities.</p>
12	<p>Based on Council's wish for "relatively flexible powers" and the first draft of the drafting instructions, my view is that the 1873 Deed should prevail in the event of any inconsistencies between the Deed and the legislation.</p>
13	<p>I was not convinced by the reasons presented on page 18 of the discussion document for taking the Town Belt out from under the Reserves Act. More details about the specific responsibilities of the trustees under a charitable trust compared with the responsibilities of councillors under the Local Government Act may help, but are unlikely to provide the level of protection provided by the Reserves Act, case law and current best practice.</p>

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14.3	Please add the words which referred to “no buildings on the Town Belt ”.
14.4	Giving Council statutory rights to lease up to 40 hectares of Town Belt land is unacceptable as it may result in further loss of opportunities for the public to have unlimited access to the Town Belt for public recreation.
16.1	Supported
16.2	Please reword as follows. Restricting public access to parts of the Town Belt to the limited extent necessary to enable work to be carried out safely or to facilitate temporary activities such as sporting events”. The word ‘limited’ needs to be applied to the area closed and the length of the period of closure
16.3.	Please identify any legal mechanisms (other than the Management Plan) under which Council could set conditions or rules to regulate use of the Legal Town Belt. Does this refer only to by-laws?
17	Supported
18.	Supported
19.1	Partial agreement. Please add a requirement for notification of, and consultation about renewals of leases and licences, particularly where Council has received complaints about the operation of the activities authorised by the lease or licence.
19.2	As written, 19.2 may contradict the reassurance given in the FAQs that the drafting instructions do not make it easier for Council to allow commercial uses of the Town Belt. An explanation of the difference between the decision-making processes for “granting” compared with “authorising” may help. Understanding such distinctions may be an important part of understanding the current governance system.
20	Please encourage the drafters to model the statutory provisions for leases and licences on Part IIIB of the Conservation Act. (e.g. rent reviews, the right to impose conditions, and the monitoring of compliance with conditions).
23	This provision appears to wipe the slate clean. In other words, any decisions made by previous Councils that may have been in contravention of the Deed will henceforth be considered legal. The public may be more willing to “wipe the slate clean” if Council commissions and releases an independent report into any decisions that would be legalised by this provision.
25	Supported
26	Supported

Submitters - Monday 18 February 2013

Sibmission 92

From: Port nicholson medical cent Port nicholson medical centre [pnmc.smith@xtra.co.nz]
Sent: Monday, 10 December 2012 1:24 p.m.
To: Megan Dunning
Subject: submission re Town belt legislative and policy review
Attachments: submission re TBMP[1].docx

Please send receipt

cheers Lorraine Smith

Submitters - Monday 18 February 2013

Submission on Town Belt Legislative and policy review.

The Town Belt is one of Wellington's greatest assets and the majority of citizens highly value the Town Belt for its open space (Council commissioned survey 2009 and workshops 20120). The pressure for further development on the Town Belt can only increase as the population increases and inner city land becomes more valuable. It is vital the Town belt remains highly protected by legislation.

I oppose the changes in the legislation that grant the council more powers over the Town Belt. The 1873 Deed which gifted the land to the people of Wellington should remain the governing document of the Town Belt. The Town Belt should remain as the Deed states a *public recreation ground for the inhabitants of the City of Wellington*. The legislation will interpret the Deed's *public recreation ground* "as applying to circumstances as they arise"

The changes in legislation are very likely to mean that previously proposed projects for development on the Town Belt (for examples the gondola and restaurant on Mount Victoria ,, private driveways over the Town Belt (e.g. Mary Seddon Wadestown), more educational facilities and large memorial structures (Greek memorial) would be very likely to be permitted . All the aforementioned projects had significant council support at the time, but were stopped due to public opposition and critically protection afforded by the Town Belt Deed.

The statement that the 'Town belt is for all to enjoy,' at first glance seems a worthy aim. However on further consideration one has to ask the question to enjoy as what? For some recreation is gambling and visiting night clubs. The .addition of the words 'enjoy as open space' would indicate an intent consistent with the original intent of the founders of the Belt.

- I support the council having the legal right to return former Town Belt land to Town Belt trust status. I Oppose the addition of "any other land" not formerly part of the Town Belt.
- The Town Belt is culturally and historically important to the people of Wellington, diluting the Town Belt with other land potentially may weaken the status of the land and lessen its heritage and historic value. Land additions should be zoned differently to the original Town Belt which has a unique historical status.
- I request the council actively seek reinstatement of alienated portions of the original Town Belt that are available for re-inclusion
- I am particularly concerned the council no longer proposes to seek the reinstatement of Clifton Terrace Old Correspondence school site. This reserve is highly valued by local residents and by Clifton Terrace School. As inner city living increases areas of open space are vital to the health and well being of citizens. The upper section of the Clifton terrace site is used frequently by children to play ball and other games. Many surrounding the Clifton Terrace site have no land and the only other option is for children to play on the street. The upper part of the site is flat and is not used for car parking (as stated incorrectly in the draft plan)

Historically the site is an important remnant of the original Town Belt and many Wellingtonians have actively campaigned for it's retention and opposed attempts by the Crown to sell the land. The Clifton Terrace site provides a link from the historic Bolton St cemetery, along Clifton Terrace then up through the walkway in the Old correspondence school to Talavera Tce, then on to the track off Everton Terrace leading to Kelburn Park and the Botanic Gardens .A surprising number of tourists come either up through the reserve or down via Talavera Tce

Zealandia has helped reintroduce bird life into the city and Clifton Tce is home territory for many birds .In order for bird life to survive there need to be corridors of vegetation through which they can travel and migrate.(Forest and Bird). Without such corridors survival of bird life is severely threatened.

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The Clifton Terrace site was taken from the Town Belt without any recompense to the people of Wellington. There is no evidence of financial transactions occurring at the subsequent changes in status and as such the Public works Act should apply. This would supersede RFR. (RFR applies to all Crown owned land in the Wellington region)

Ms Lorraine Smith
Richard Smith
3 Talavera Tce
Kelburn

043844315 work
0274300222 mob
4990303 home
pnmc.smith@xtra.co.nz

I am making my submission as an individual and in conjunction with Talavera and Clifton residents whom indicated they wish to be party to this submission
I/We wish to make an oral submission to the city councilors.

Submission

The Wellington Town Belt
Legislative and Policy Review
December 2012

Submission by:-

Mr Michael Hartley

52 Porritt Avenue

Mt Victoria

Wellington 6011

Phone 802 4492 and 027 275 4279

email michaelehartley@xtra.co.nz

I am making this submission as an individual

I would like to make an oral submission to City Councillors

Proposed Legislative Changes – Drafting Instructions

1.0 Although the passing of legislation to include former Wellington Town Belt (Town Belt) land within legal Town Belt is welcomed, it is disappointing that the proposed legislation will result in extended trustee powers and less participation by citizens, the beneficial owners of the Town Belt.

1.1 The change in legal status and specific exclusion from current legislation (clause 13) has removed citizens' right to appeal the actions of the trustees currently contained in that legislation. As citizens are the owners of this land they must maintain the right to dispute the action of trustees without suffering serious financial disadvantage.

This is a serious omission.

1.2 The Town Belt is at serious risk in the total looseness of the interpretation of recreation (clause 11.3) as being whatever council officers want it to be. This could allow commercial and other activity which would be detrimental to the sustainability of the open space values.

The interpretation of recreation should be tied to the intent of the 1840 and 1873 documents which clearly show an intent for primarily open space activity.

1.3 Clause 3.4
This clause provides that the Bill must be consistent with the Deed but then provides in clause 12 that the Bill will prevail if it is not consistent so the Bill ends up not being consistent with the Deed.

1.4 Clause 11.2
No reason has been given for redefining the Town Belt as a Charitable Trust. The effects of this move should be considered by independent legal experts to ensure any detrimental aspects that could arise are identified.

1.5 Clause 14.4
The area of land proposed for leasing at 40 hectares appears to be between five and eight times the current area of leased land. There is no reasonable justification for setting such an enormous increase into legislation. If the intent to consolidate sporting activities is genuine the status quo or a minimal increase of no more than a hectare could be considered.

1.6 Clause 19.2
This clause pre-supposes a power by the City Council to lease land for commercial purposes. No such power exists and the Deed is clear that the Town Belt is owned by the citizens and is not intended as being part of the commercial estate of Wellington.

Draft Town Belt Management Plan

2.0 Tourism and Development

There is a disturbing lack of understanding of the ownership and values of the Town Belt exhibited by the officers compiling this draft plan who appear to believe that commercial tourism benefit is a factor in decision making on the Town Belt.

This must cast doubt on the integrity of the decisions that will be made under this plan and indicates increased strength is needed in the decision making criteria.

Examples of the thoughts of the authors are :

2.1 Page 8 – Big space links.

The author likens the Town Belt to the Waterfront and adds the benefit of “providing additional amenities within these large open areas will enable increased use”

Most Wellingtonians are well aware that “increased amenities” on the waterfront in WCC jargon is office buildings with commercial operations that “may” be publicly accessible. This is not wanted on the Town Belt.

2.2 Page 48 Elite Sport including professional (commercial)

The author quotes one justification for elite sport as being “elite sport and associated events are important to Wellington as a destination for major events, entertainment”

This reason should not be a criteria for decisions on land use. There is no case to support commercial entertainment sport and this is further covered later in this submission.

2.3 Page 175 Clause 9.5.1.c Decision making guidelines

The Town Belt has been placed in trust for the citizens of Wellington and decision making should be confined to the interests of these citizens.

However a new category of user has been established for purposes of decision making. This is separate and additional to the local and regional community and mana whenua (generally Wellington citizens) and is called “park visitor” otherwise known as Tourist.

Decision making should be made entirely for the interests of the inhabitants of Wellington and this clause should be amended. This is particularly important as the benefits of tourism could be cited as justification for otherwise unwanted developments.

3.0 **Commercial Activity**

- 3.0 The new management plan has introduced a clause that specifically allows by exception (clause 9.6.3) commercial enterprises to operate permanent recreational activities on the Town Belt. This activity is not confined to the so called sports hubs but is permitted anywhere on the Town Belt.

This change of policy will allow activities that have previously been vetoed by the Wellington public to be introduced by council officers without public notification.

It is worth noting that this concession has been hidden in the management plan as a “prohibited activity” when in fact it is now a permitted activity.

The Council already has adequate public notification in the form of surveys and other public interaction to be well aware that commercial enterprises are not wanted by Wellingtonians on the Town Belt.

- 3.1 Commercial activities should be limited to incidental amenities such as food and refreshment at short duration events or events of an occasional nature such as a mountain biking or running event.

Similarly bars associated with sporting facilities should only be operated as an incidental to the main activity and should not be trading at other times as a competitive facility to commercial premises operating in the CBD.

- 3.2 Commercial entertainment businesses operating under the auspice of elite sport should be required to move from the Town Belt as their leases expire. The Hurricanes are already a purely commercial operation operating for profit and it is quite feasible that the business could in the future be owned by Russian, Middle Eastern or Asian interests.

The experience with Telecom and other state assets has demonstrated that interests believed to be distinctly New Zealand can quickly move to overseas ownership and culture.

- 3.3 Commercial long term activity should be prohibited on the Town Belt.

4.0 **Section 9 - Rules for Use and Development**

- 4.1 Although these rules appear to be comprehensive it is stated in Section 1.3 that sector policies take precedence.

This means that rules expressed or only inferred elsewhere in this (in excess of 200 pages) document may render the rules in section 9 redundant.

This is a fragmented policy structure which will lead to misunderstanding and legal challenge.

- 4.2 There is no reason why the Rules in Section 9 can not be comprehensive and all encompassing for the whole of the Town Belt.

Uncertainty must always prevail in the Governance process if the officers are unable to clearly document the policies that apply across the Town Belt. Where exceptions apply to specific sectors, these should be notated in section 9 so that the public is aware of the situation and is not precluded from participation in the use of this Wellington treasure.

The situation that arose recently regarding the Badminton Hall should not be allowed repetition because officers have not developed clear and understandable governance guidelines. The cost to ratepayers, private individuals and organisations must have approached \$200,000 in total because of inadequate and fragmented policy documentation.

5.0 **Prohibited Activities**

- 5.1 It is a serious omission that the operation of gambling facilities and pokie machines is not a prohibited activity on the Town Belt.

This has already been an issue with an organisation preying on the vulnerable in the community to continue an unsustainable activity so Council officers should have been aware of this as an undesirable and unwanted feature.

- 5.2 Given that clubs on the Town Belt receive tens of thousands of dollars from Pokie profits (sport wins – hungry children lose) these clubs are liable to pressure from gambling interests to allow these facilities.

One club (whose grants appear enormous) even advertises three gambling outlets on its website as being “partners”

- 5.3 A clear gambling prohibition would protect these clubs from pressure to introduce these facilities in clear violation of Town Belt principles

Submission 194

From: Wellington City Council [webcentre@wcc.govt.nz]
Sent: Monday, 10 December 2012 4:53 p.m.
To: Megan Dunning
Subject: Town Belt Legislative & Policy Review - Submission

The following details have been submitted from the "Town Belt Legislative & Policy Review" form on the Wellington.govt.nz website:

First Name: Rosalind
Last Name: McIntosh
Street Address: 11 Wesley Rd
Suburb:
City: Wellington
Phone:

Email: flowingmountains@yahoo.com

I would like to make an oral submission in February 2013.

(Please provide your phone number for an oral submission.) Yes Your phone number: 048890933 I am giving this feedback: as an individual Organisation name:

----- Section One - Draft Town Belt Management Plan -----

Overall, do you support or oppose the general direction of management for the Town Belt?

Support

Why do you say this?

I support that

1 The Wellington Town Belt will be protected and enhanced by the Council for future generations.

2 The Town Belt will continue to be governed in trust by the Council.

3 The Council will work in partnership with mana whenua to manage the Town Belt

but only if they support the aims of the list and access to the town belt for the use of all Wellington citizens free of charge.

4 The Town Belt's landscape character will be protected and enhanced.

Submitters - Monday 18 February 2013

5 The Town Belt will support healthy populations of indigenous biodiversity.

6 The Town Belt is for all to enjoy.

7 The Town Belt will be used for a wide range of recreation activities

but in keeping with the other aims on this list.

8 The Council will encourage and support community participation in the management of the Town Belt.

9 Management of the Town Belt will acknowledge historical and cultural links to the land.

The plan proposes to protect an additional 85.03 hectares under the Town Belt Deed (chapter 2 of the draft plan). To what extent do you support or oppose this?

Neither support nor oppose

Why do you say this?

The plan proposes criteria for assessing land to be added to the Town Belt (chapter 2 of draft plan). To what extent do you support or oppose the criteria?

Neither support nor oppose

Why do you say this?

The plan proposes to restore and enhance ecosystems and increase the indigenous vegetation cover on the Town Belt (chapter 5 of draft plan). To what extent do you support or oppose this?

Strongly support

Why do you say this?

The resource of the Town Belt is a major and accessible asset offering high quality of life in Wellington City. To not make its ecological character local and restore its original qualities as much as possible is to lose a vital opportunity for connecting to what makes us uniquely who we are.

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?

Neither agree nor disagree

Why do you say this?

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?

Strongly support

Why do you say this?

It would be easy to lose the informal and casual use of the Town Belt by over-development of sporting facilities. This informal use is what offers this special land's human life restorative and cultural value.

1. Theme, sector, or policy and page number:
Changes in Sector 2 management

Comment

Contrary to the proposed plan for management of the Kelburn Park area, I consider the Crown-owned land at Clifton Terrace to be a high priority to return to the Crown Belt. It is a place where urban children play and explore. It is a place where birds, including tui and kaka feed and live on lovely mature trees. Many residents such as myself walk there and I frequently meet tourists here coming from Bowen Street cemetery.

New Zealanders' passion for nature and things natural is an important part of our image in the world and it starts with our childhood experience. The ability to play and explore in the wild was an essential formative part of my own early childhood and my current deep connection to, and teaching of connection with nature, ecology and wilderness.

Parking used by Clifton School occurs on the lower level only with the upper level and green spaces used particularly by children and wild life. It could be developed in ways that support and encourage further these uses. This little gem area so suitable for the young, is far enough away from the city, motorway and traffic to be very appropriate for retaining and protecting its wildness value.

In addition it adds a great deal of character and value to the surrounding houses and their outlooks. It needs protection to retain the quality of the neighbourhood and must not be developed into high density housing or businesses. It was part off the City Belt originally and should be returned to it for protection for the above reasons.

2. Theme, sector, or policy and page number:

9.3

Comment

Educational programmes that enhance conservation, connection to place, sustainability and recreational use of the town belt should be an allowed use. For example EOTC (Education Outside the Classroom) programmes run by schools.

3. Theme, sector, or policy and page number:

9.5.1

Comment

Environmental education, though not mentioned, does serve to contribute positively to many of the guidelines in this section.

4. Theme, sector, or policy and page number:

9.5.3

Comment

Community gardens have an important role in encouraging community access and use of the town belt for recreation, and in promoting the conservation values that underpin the town belt management. Education is a key element of their activities - particularly in terms of contributing to conservation, connection to place, sustainability and recreation.

5. Theme, sector, or policy and page number:

Comment

Do you have any additional comments?

I would like to see more environmental education provided on our town belt and that there is an allowance made for certified environmental education and environmental appreciation, such as horticulture, natural history, and other classes to be run.

----- Section Two - Proposed legislative changes -----

Do you support or oppose the overall objectives of the proposed legislative change?

Neither support nor oppose

Why do you say this?

1. Paragraph number:

Comment

2. Paragraph number:

Comment

3. Paragraph number:

Comment

4. Paragraph number:

Comment

5. Paragraph number:

Comment

Submission 119

From: Wellington City Council [webcentre@wcc.govt.nz]
Sent: Monday, 10 December 2012 10:15 a.m.
To: Megan Dunning
Subject: Town Belt Legislative & Policy Review - Submission

The following details have been submitted from the "Town Belt Legislative & Policy Review" form on the Wellington.govt.nz website:

First Name: Jill
Last Name: Ford
Street Address: 94 Coromandel st
Suburb: Newtown
City: Wellington
Phone: 043894496
Email: jill.ford1@gmail.com

I would like to make an oral submission in February 2013.
(Please provide your phone number for an oral submission.) Yes Your phone number: 021671291 I am giving this feedback: as an individual Organisation name:

----- Section One - Draft Town Belt Management Plan -----

Overall, do you support or oppose the general direction of management for the Town Belt?

Neither support nor oppose

Why do you say this?

The overall changes seem to make sense, however there are aspects that are of concern.

The plan proposes to protect an additional 85.03 hectares under the Town Belt Deed (chapter 2 of the draft plan). To what extent do you support or oppose this?

Support

Why do you say this?

Important to preserve it for future generations. It makes Wellington unique and ensures we continue to have open green spaces.

The plan proposes criteria for assessing land to be added to the Town Belt (chapter 2 of draft plan). To what extent do you support or oppose the criteria?
Neither support nor oppose

Why do you say this?

It is confusing as to what constitutes town belt and what is reserve, how the decisions are arrived at and the practical implications.

The plan proposes to restore and enhance ecosystems and increase the indigenous vegetation cover on the Town Belt (chapter 5 of draft plan). To what extent do you support or oppose this?

Support

Why do you say this?

Support where there are old trees that need to be felled, or where there is lots of gorse, but where current vegetation is robust and attractive then it should be retained.

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?

Neither agree nor disagree

Why do you say this?

Good to make more use of tracks for events BUT there should be no charge UNLESS WCC also plans charging for events on pavements and roads, eg why should a MT bike event or off road running event be charged but not a Triathlon or Half marathon.

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?

Neither support nor oppose

Why do you say this?

Depends on the sport, eg why does there need to be an 18 hole golf course at Berhampore, when there are lots of golf clubs around. Would be better and cost less to make it a 9 hole and release the land for tracks.

1. Theme, sector, or policy and page number:

Tawatawa reserve

Comment

The land between Berhampore Golf course and Happy Valley Road has great tracks that are well used. I see no good reason why this area shouldnt be part of the Town belt, as it fits in beside oterh parts fo the town belt.

2. Theme, sector, or policy and page number:

Polihill

Comment

Transient track was built by MT Bikers as are many other recent tracks. All these tracks should at least have MT Bikers have priority AND dogs MUST be on leashes, as the tracks are narrow. With Transient now being very popular this needs ot be one way with another downhill route, this should be built by the WCC and not be reliant on mt bike volunteers, after all none of the other WCC

sport and rec facilities have to be built by users, eg cricket, soccer, netball.

3. Theme, sector, or policy and page number:
General funding for tracks

Comment

There needs to be increased funds for tracks as more people are now using them. Even if this means a decrease in funding for other sports facilities. For examples hundreds of thousands is put into Basin Reserve yet its hardly ever used, plus there is the Westpac stadium. More bikers and walkers would use Basin reserve than cricketers, it would be better used as a park!

4. Theme, sector, or policy and page number:
Mt Albert to Coromandel st

Comment

I live in Coromandel st and regularly use the tracks from Mt Albert down through to Coromandel st, via the water tower. I can see no reason for why the access for cars to the water tower cant be continued, there is NO danger, cars travel slowly, there is very little car traffic, and to remove the parking would cause major parking congestion in the street. There are many valid reasons for vehicular access to continue, including:

- The historic and continued use of the road
- No alienation of the public from use or enjoyment of that land
- No erected structures or harm caused to the town belt
- Parking congestion in southern Coromandel Street
- Intensification of housing in Coromandel Street
- Reasonable access to properties that pay council rates
- Safety
- Maintenance of the area by residents
- The outcome of previous reviews
- Solutions provided to residents in similar situations.

We believe that the continued access does not amount to an unreasonable intrusion of enjoyment of users of this section of the Town Belt and cannot find a compelling reason for this access to be removed.

WCC continues to build infill housing in Newtown with no consultation with

residents or consideration of the traffic congestion this is causing, restricting access for people at the south end of Coromandel st will just aggravate an already growing parking problem in Newtown, with absolutely NO benefit to people using the town belt.

5. Theme, sector, or policy and page number:
Tracks for commuting

Comment

While its great that WCC are considering developing more tracks for commuting, these need to be part of an overall biking strategy that links a whole network of cycle ways on the roads. More people are now biking and more people would bike (which would reduce congestion and make public transport faster) but are concerned about safety, due to so little provision for cyclists on WCC roads. we need more cycle ways on and off road.

Do you have any additional comments?

Makara Peaks - this is not Town belt but is part of WCC tracks!! This is primarily a MT Bike Park, and in other MT bike parks around NZ there are separate tracks for walkers and bikers. The current situation is dangerous as all the tracks BUILT by bikers and funded by BIKERS are single track and not suitable for walkers with dogs. PLEASE can the single track be clearly signed as for bikers only before there is a serious accident. walkers can sue the 4WD tracks instead.

----- Section Two - Proposed legislative changes -----

Do you support or oppose the overall objectives of the proposed legislative change?

Neither support nor oppose

Why do you say this?

If it makes it easier for WCC to manage then fine, as long as rate payers have a say and tracks / town belt are funded properly and on a similar level to other sport and recreation facilities..

1. Paragraph number:

Comment

2. Paragraph number:

Comment

3. Paragraph number:

Comment

4. Paragraph number:

Comment

5. Paragraph number:

Comment

Submitters - Monday 18 February 2013

From: jill@forwardthinking.co.nz
Sent: Monday, 10 December 2012 10:25 a.m.
To: Megan Dunning
Subject: 2012 Town belt Management Plan submission.docx
Attachments: 2012 Town belt Management Plan submission.docx

I wish to add my support to the submission attached re parking and access at the top of Coromandel st, by the water tower.

As someone who lives in Coromandels t, restricting parking at the water tower will cause further congestion to parking in Coromandel st.

I also walk and mountain bike from Coromandel st to Mt Albert and rarely experience traffic movement and have NEVER in 20 years felt in danger due to traffic! Nor do I feel that the cars parked there in anyway impacts on my enjoyment of the area or use of the town belt!

The area around the water tower has to retail parking and the road has to remain for access to the tower, so I cnat see that there is going to be anything to be gained by restricting residents parking.

There are many reasons for vehicular access to continue, including:

- The historic and continued use of the road
- No alienation of the public from use or enjoyment of that land
- No erected structures or harm caused to the town belt
- Parking congestion in southern Coromandel Street
- Intensification of housing in Coromandel Street
- Reasonable access to properties that pay council rates
- Safety
- Maintenance of the area by residents
- The outcome of previous reviews
- Solutions provided to residents in similar situations.

The continued access does not amount to an unreasonable intrusion of enjoyment of users of this section of the Town Belt and I cannot find a compelling reason for this access to be removed.

WCC continues to build infill housing in Newtown with no consultation with residents or consideration of the traffic congestion this is causing, restricting access for people at the south end of Coromandel st will juts aggravate an already growing parking problem in Newtown, with absolutely NO benefit to people using the town belt.

Regrads
 Jill Ford

Jill Ford
 jill.ford1@gmail.com
 94 Coromandel St, Newtown, Wellington
 04 3894496, 021 671 29, Skype jillford
"If it wasnt for gravity and law enforcement, I would be unstoppable!"

20 December 2012

Parks and Gardens
Wellington City Council
PO Box 2199
WELLINGTON 6140

Draft Town Belt Management Plan Submission

Coromandel Street / Carmichael Reservoir / Colville Street Town Belt Access Encroachments

This submission specifically refers to proposals to change Wellington City Council policies on encroachments on the Town Belt, especially with respect to the proposals that refer to the Carmichael reservoir and nearby areas. The proposed Plan will have significant direct effects on over 20 households, and indirectly affect many more.

This submission includes a brief history of private access to the Carmichael reservoir, corrects some information in the Draft Plan, summarises the concerns of affected households, and puts forward suggested solutions. We also recommend some specific changes to the text of the Draft Plan.

We would like to supplement this written submission with a presentation in person to the Council.

Contacts

Chris Gray
139 Coromandel Street
Newtown
Wellington 6021

James Harris
147 Coromandel St
Ph 389 1195, james@harris.net

The full list of people contributing to this submission is:

Full Name

Reece van der Velden
Virginia Edmond

Home Address

Apt 3/111 Coromandel
Street
19 Colville Street

Submitters - Monday 18 February 2013

Full Name	Home Address
Wayne Eichler	5 Colville Street
Liz Eichler	5 Colville Street
	Apt 12 /111 Coromandel Street
Liz Dennett	Street
Annie Scott	134A Coromandel Street
Roger Howard	134A Coromandel Street
Sophie Williams	148 Coromandel Street
Mike Smith	4 Paeroa Street
Nicola Beale	4 Paeroa Street
Colin Frank	141 Coromandel Street
Dionne Needham	152 Coromandel Street
Harry Livesey	148 Coromandel Street
Abbie Rowe	143 Coromandel Street
James Rowe	143 Coromandel Street
Nick Treadgold	150 Coromandel Street
Jude	150 Coromandel Street
Rita	150 Coromandel Street
Heather and Greg Nicholls	93 Coromandel Street
Jill Ford	94 Coromandel Street
David and Adrienne Hermans	114 Coromandel Street
Katherine Wong	123 Coromandel Street
Sally Krogh	135 Coromandel Street
Joy Telford	138 Coromandel Street
Chris & Steph Gray	139 Coromandel Street
Annette and Ben Gittos	139A Coromandel Street
Fraser Fraser Cuff	140 Coromandel Street
Rae McNair	140 Coromandel Street
Dave Henderson	142 Coromandel Street
Glen-Marie Burns	142 Coromandel Street
Marion and Quentin Abraham	144 Coromandel Street
Chris & Debra Polaschek	145 Coromandel Street
James Harris	147 Coromandel Street
Giselle Bahr	147 Coromandel Street
Gordon Clarke	149 Coromandel Street
Wendy Kale	149 Coromandel Street
Fiona McKenzie	152 Coromandel Street
Tania McKenzie	152 Coromandel Street
Jenny Hodgen	152a Coromandel Street
Dean & Munjoo Maharaj	123a Coromandel Street
	Apt 4-5, 109 Coromandel Street
Frances Hopkins	Street
Vanessa & Marcus Simons	1 Colville St
Johnny Nawaz	122a Coromandel Street
Hamish Handley & Hariata Hema	7 Colville Street
John Hoggard & Susanne Sturzenhofecker	8 Paeroa Street

Our Community View

The Draft Town Belt Management Plan would substantially change current Wellington City Council policy on private access to the Carmichael Reservoir along "Carmichael Rd". The following information outlines the view of residents from southern Coromandel Street on the Council's proposal to potentially restrict residents' access to the reservoir service road for parking and access purposes. 20 properties are directly affected, and many more are affected by the flow-on effects on parking and congestion.

The community of residents offer to work with Council to find a solution that improves the Town Belt and allows controlled vehicle access to continue. There are many valid reasons for vehicular access to continue, including:

- The historic and continued use of the road
- No alienation of the public from use or enjoyment of that land
- No erected structures or harm caused to the town belt
- Parking congestion in southern Coromandel Street
- Intensification of housing in Coromandel Street
- Reasonable access to properties that pay council rates
- Safety
- Maintenance of the area by residents
- The outcome of previous reviews
- Solutions provided to residents in similar situations.

We believe that the continued access does not amount to an unreasonable intrusion of enjoyment of users of this section of the Town Belt and therefore we cannot find a compelling reason for this access to be removed, other than the council's own parks and recreation policy perspective on this matter.

Further, we have serious concerns about the process and the quality of information given to the public and council. This submission attempts to clarify:

- That the Carmichael Rd **is not the encroachment referred to in the Draft Plan**
- That Carmichael Rd is at least sixty years older than stated in the Draft Plan
- That **the existing arrangement already solves the issues raised** in the Draft Plan
- **The existing arrangements are different from what it stated in the Draft Plan**, and in any case are the result of an incomplete process that we understand was never formally presented to or considered by the Council.

Potential solutions?

The undersigned residents of Coromandel and Lawrence St highly value living next to the Town Belt and support the Council's intentions to improve the quality of the Town Belt. We suggest that formalising the status of the Carmichael Rd could result in better maintenance of this corner of the Town Belt for the use and enjoyment of all city residents.

Several other options are also put forward for Council consideration, including:

- Completing the paper roads of Coromandel St and Lawrence St
- Upgrading Carmichael Rd to Legal Road
- Using the new provisions in the Town Belt Bill to enable land swaps between the Council's road reserves and the Town Belt.

Background: Current proposals

The most relevant sections of the Draft Plan are:

8.7.6 Encroachments

A vehicle track, which provides access to the water reservoir off Owen Street, is also used by local residents for drive-on access to several nearby private properties. As the Southern Walkway passes along part of the length of this track, vehicle traffic is not only inappropriate but presents a potential safety hazard. This track also attracts rubbish dumping because it is secluded and accessible by car. A gate has been installed at Owen Street with private vehicle use being phased out over time. No new access is being permitted.

9.6.9 Encroachments.

[...]

There are 206 known encroachments on the Town Belt covering 2.5626ha as of June 2012.

These are broken down as follows:

- 77 gardens/lawns and or plantings
- 13 partial house encroachments
- 8 pedestrian access-ways
- 69 structures such as clotheslines, garden sheds, compost bins and so on
- 35 vehicle accesses from parking places through to larger access routes, such as Carmichael Reservoir.

Many aspects of these two sections are incorrect:

- The 'track' is a road used by heavy vehicles needed to maintain the Carmichael Reservoir.
- The access route to the Carmichael Reservoir is not included in the 2.5626ha of encroachments.
- The Southern Walkway does not pass along part of this road; it crosses it at one point; this change was implemented following consultation with residents in 2010.
- The gate which was installed in 2010 restricts access to Council-approved vehicles; this has successfully solved earlier issues of safety and rubbish dumping.
- While no new access is being permitted, this is a policy developed by council officers, that we understand has never been considered or endorsed by Council.

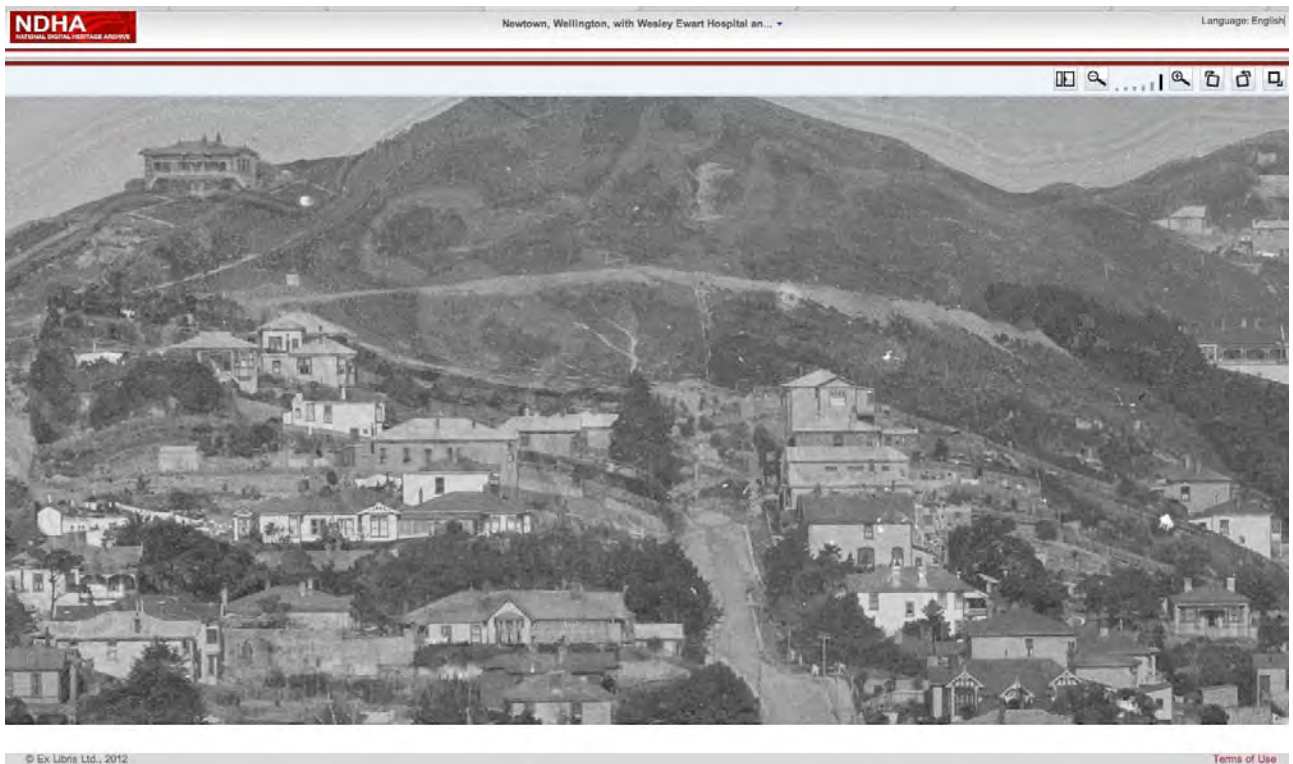
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Council officers have also provided us with additional information. At public consultations on the Draft Plan, Council Officers stated that the vehicle track is in fact access for utilities, ie the Carmichael Reservoir, and **is not included in the list of encroachments** listed in the Draft Plan. Council Officers have since provided us with a copy of the aerial photos used to identify and measure the area of encroachments. (see Attachment 1). The Council's photos clearly show that only two areas of land beside and beyond the water tank are considered to be 'encroachment'. Also, the Southern Walkway does not pass along part of the length of this track: it crosses the road at one point near the intersection of two paper roads: Coromandel St and Lawrence St.

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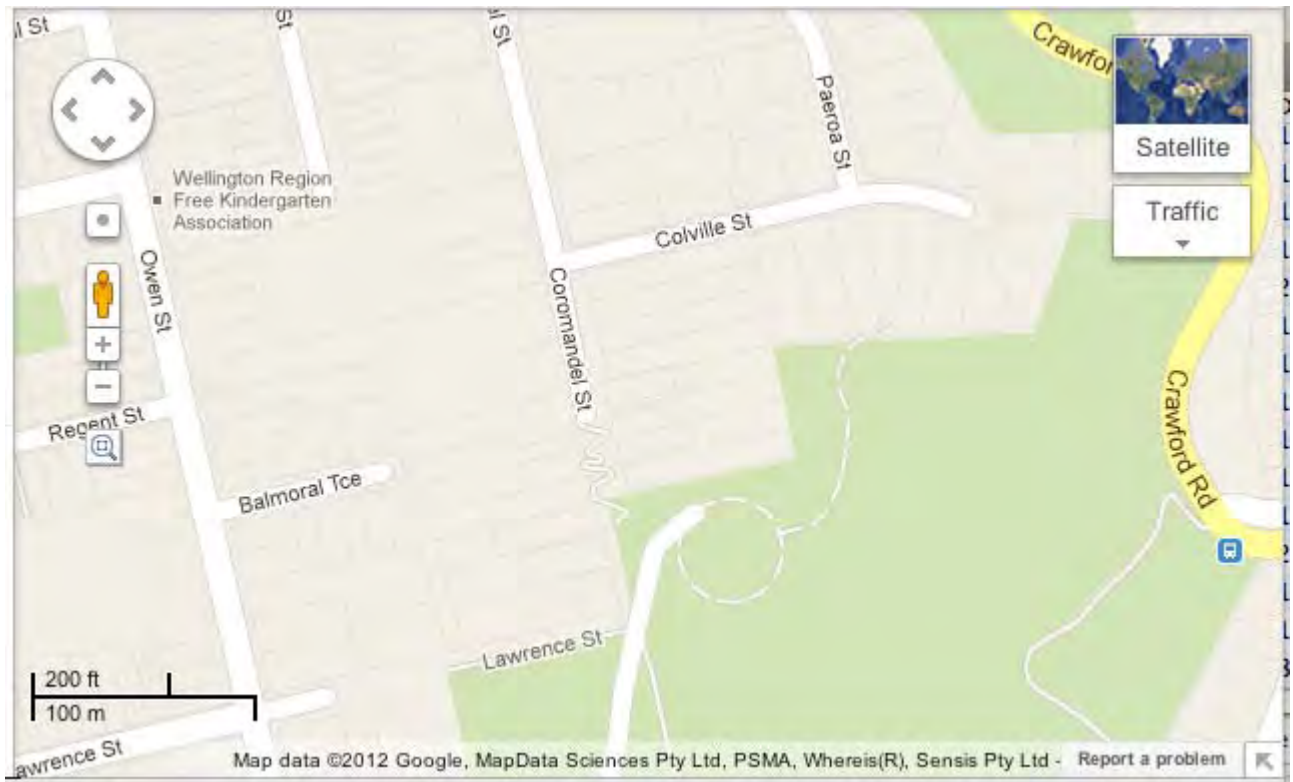
Background: History of Carmichael Rd, Coromandel St, and Lawrence St

The following photo from the National Digital Historical Archive is dated 1909. It looks south along Coromandel St towards the hilltop that is now Truby King Reserve. Carmichael Rd is the white line running across the centre of the hill, starting at 149 Coromandel St on the left. Clearly, Carmichael Rd predates many of the houses at the top of Coromandel and Lawrence St. This is in contrast to statements made by council officers at public meetings and in correspondence, that the road was constructed in 1959 or in the 1960s.



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The current situation is shown in the following 2 images from Google Maps and Google Earth. The first shows how about 14 properties on Coromandel St and 6 properties on Lawrence St do not have proper road access, instead connecting to the undeveloped Coromandel St and Lawrence St road reserves.



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The second image, looking north over the reservoir, shows how the steep streets at the south-eastern corner of Newtown have prevented the original 1841 street plan from being implemented. It is also clear that the Town Belt 'encroaches' on the Coromandel St and Lawrence St road reserves.



This evidence shows that the road has been around since at least the early 1900s and like other roads at the time may have been created to make access between town and country from the 1870s. The paper road at the southern end of Coromandel Street running between the properties up the hill (intended to link with Lawrence street) was never completed, because the existing access road (at one time paved) already provided good access. The southernmost houses on Coromandel Street were built later on the basis of the longstanding access road and the existence of the Paper Roads that may at some future time have been converted to roads despite the obvious geographical difficulties. The residents of the houses at the southern end of Coromandel Street have always used this access road.

Previous consultation and council actions

Council officers consulted with affected residents about restricting access in 2010, 2006, 2002, and earlier. In each case, although residents consulted in good faith, no comprehensive solutions were agreed.

In the most recent round of consultation in 2010, council officers undertook traffic and parking surveys in Coromandel St and neighbouring Colville St.

Despite the outcome of that consultation not being formally put before Councillors for adoption as policy, roadworks to improve parking at the south end of Coromandel St, and a remote controlled gate was installed beside the Working Mens' Bowling Club at Owen St in 2011. It can be opened by calls from a cellphone; this allows Council officers to both control and monitor access. This is used by many Coromandel St and Lawrence St residents. Council officers have also granted temporary access from time to time for tradesmen accessing private homes for, contractors developing the Carmichael Reservoir and water pipes, and for forestry workers.

No new access allowed since 2010

Council officers have chosen not to allow access to new tenants or new home owners since the gate was installed; this is contrary to the current council approved policy (the 2002 Resolution of access encroachments on Town Belt Land report) and does not align with the assurances given by Former Mayor Prendergast in her many letters to Coromandel Street residents back in 2010 that access will remain unchanged until a consultation process was completed.

Policy – Encroachments

- 8.7.6.1 Measures shall be taken to exclude all private vehicle use from the reservoir access track.

This statement assumes a single solution, we disagree that a solution should be stated, and request that this be replaced with a statement that provides for research, consultation and options for resolution that are fair and transparent.

9.6.9 Encroachments.

Encroachments into the Town Belt are a significant issue for the management of the reserve. The use of public reserve land by private property owners effectively alienates the

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public from use or enjoyment of that land⁴⁵. This is contrary to both the Town Belt Deed and the purpose of provision of public open space.

We disagree with the overall 9.6 section and recommend that its wording be changed. There needs to be a clear policy going forward and a clear and fair process for reviewing historic issues. Whilst some encroachments may be deemed significant from a policy perspective, many are not.

We also disagree that the parking by the reservoir or on private land that is accessed from Carmichael Road in any way alienates the public from use or enjoyment of the land.

All the section 9.6 clauses assume there is only one solution from the council's perspective, which is removal and restatement. We don't agree that this is the only solution and is contrary to assurances that have been provided in the past and inconsistent with the current policy (The 2002 Resolution of access encroachments on Town Belt Land report).

- 9.6.9.1 Encroachments are a prohibited activity.
- 9.6.9.2 The Council will resolve the existing encroachments with a view to regaining lost land.
- 9.6.9.3 The Council will protect the Town Belt from new encroachments.
- 9.6.9.5 The Council will require removal of all encroachments either immediately or as a managed process. Managed removal will require issuing a letter of understanding, and a licence to formalise the removal process.
- 9.6.9.6 Encroachments must be removed immediately when: a. the encroachment is considered dangerous (the assessment of danger is at the full discretion of the Council)
- 9.6.9.9 If the encroachment is associated with private vehicle or private pedestrian access and immediate removal is complicated by long-term historic use, then a longer term removal agreement such as a fixed-term licence may be negotiated. This will allow agreement of reasonable terms while also ensuring that the access encroachment is removed as per policy 9.6.9.1, 9.6.9.2 and 9.6.9.3. The maximum period of time for this type of agreement will be until there is a change of ownership or occupation in the property associated with the encroachment.

The issues for this access.

The issues have been canvassed before and from the residents' position they remain unchanged if access is to be removed now or in the future.

We note that the 100-year old road from Owen Street to the Carmichael Reservoir will remain regardless of the outcome of the current process. It will continue to be used for maintenance access to the reservoir, for forestry operations, and for fire safety. It is also clear that there are no other options for maintaining viable access to several properties as sealing the Lawrence Street and Coromandel Street road reserves is acknowledged as being impractical.

The largest effect of any reductions in access to the road would be to restrict parking on Coromandel St. This would (and does when access is restricted) affect hundreds of people every day, including all the residents and users of Colville St, Paeroa St, and Coromandel Street south of Constable Street. Parking has become much more congested on Coromandel Street in recent years, as new apartment blocks were completed. It will get even worse if Housing NZ restarts its development plans for housing units at the old school site at 132 Coromandel Street. Restricting access to the reservoir road will force more cars to compete for parks on Coromandel Street, affecting all residents from Constable Street to the southern end of Coromandel Street.

We have not been provided with any evidence of problems for the Council or the general public if access is maintained, the installation of the gate has removed councils concerns. If however access were restricted, we believe that there would be costs to the Council in improving parking, improving access to near-landlocked properties, and managing permits for temporary access. We also believe that the extra congestion on Coromandel Street will adversely affect hundreds of residents as well as other users of Coromandel, Colville, and Paeroa streets.

Safety

We suggest that as the Carmichael road is not sealed and is rutted, that vehicle speed is slow, making it much less risky than roads like Alexandra Road. The council has no recorded incidents of safety regarding vehicles on this section of the town belt¹.

Parking Congestion

Parking in Coromandel Street is one key issue for the residents who are utilising the road, and is certainly the biggest issue for the residents at the southern end of Coromandel Street and for some in the western end of Colville Street.

Closing the road would currently require additional car parks at the southern end of Coromandel Street, Council traffic engineers have already concluded that they have maximised the number they can provide. There are not enough car parks when the road is closed for essential repairs to the reservoir and we understand the council has received complaints from residents when this has occurred in the past.

Parking studies have indicated that when the street has been surveyed parks have been available, admittedly in Colville, Paeroa and lower Coromandel Streets. Whilst this is true at times, the “last home” residents are frequently required to park in Colville Street or lower Coromandel Street, hundreds of metres downhill from where they live. This is of course even worse when access is closed.

Intensification of Housing

The Council has adopted a policy of allowing intensification of housing along key transport routes. Constable Street is a key transport route and in recent years Coromandel Street has seen many developments adding a significant number of additional apartments, all of which add to the pressure for on street parking despite the requirement for off-street parking for at least one vehicle per property.

- 111 Coromandel Street, Coromandel Heights, 12 apartments

¹ Request for information – Chris Gray October 2012

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- 131 Coromandel Street, 14 Apartments
- 109 Coromandel Street, St Helen's maternity hospital, converted to more than 20 apartments, with a further 9 in the property next to this.
- 112 Coromandel Street 7 apartments

These additions and the tendency for many homes to have more than one car have seen the parking become noticeably more crowded. Parts of the southern end of Coromandel Street have been effectively reduced to one-way for several hundred metres right down to Constable Street.

On street parking is only set to worsen for both Colville St and Coromandel residents if Housing New Zealand restarts their development of the Kura Kaupapa site at 132 Coromandel St. When the last plans were developed they intended to build 17 housing units there in 2007/08. At best, this will only take away some street frontage with parking provided for the units. However allowance for second vehicles and visitors are not usually catered for and we therefore anticipate congestion to significantly increase with this development. We note that currently there are more than 100 individual houses and apartments between 100 and 135 Coromandel Street, all these properties will be affected by this proposal.

If there is the future requirement to restrict parking or create clearways in Constable Street there will be even less available parking.

A resident at the southern end of the street has had an application to create a flat on their property declined because it would need one of the limited parking spaces on the street. It would appear contra to this type of decision for the Council then to close access for residents' vehicles forcing more cars to park on the already congested southern end of Coromandel Street.

Financial Issues

The Council should also consider the negative financial impact on home owners if regular access is removed. House prices and rental income are likely to substantially decrease if access is removed for those that use it and for the houses near it if their on street parking deteriorates. Properties that could be further developed are not likely to or indeed may not be granted consent to due to the limited parking in Coromandel Street.

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Access issues - reasonable access

In recent times there have been legal cases that have referred to what reasonable access actually means. Whilst we have not sought to compare this situation to any particular case we note that access to properties appears to be increasingly understood legally to mean vehicular access.

If the access is withdrawn nine houses will become more 'landlocked' than they are now, adding to the eight which only have frontage to a road reserve. Most have extremely long and steep access routes along narrow paths. This is of course in addition to the increasingly more difficult problem of finding a park near the walkway access at the southern end of Coromandel Street.

Closing the road will make it impossible for residents with elderly or impaired family or relatives living with them to continue doing so as well as it being prohibitive for elderly or impaired people visiting residents.

A non-related injury to a resident during the time of the recent work on the reservoir meant that as the person required crutches to walk they could not get from the bottom of the zig zag to the top, this resulted in having to take time off work when with access they could have got to and from work.

Likewise it will create difficulties for self-employed residents who need to frequently move work equipment between their cars and houses

Safety and Maintenance

As the residents are daily users of the access road they provide both a visible deterrent for any troublesome activity and the perception of safety for other users. Residents also assist in keeping the track and the area around the reservoir clean and safe through the removal of glass, rubbish and storm debris which helps keep the track accessible for all users.

Previous decisions

Previous reviews have determined that there is no particular issue with vehicular access. The additional number of properties now in Coromandel Street and the inevitable parking pressures created mean that the benefits of maintaining vehicular access now outweigh the costs to an even greater degree.

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While maintaining the Town Belt for recreational use is important, there are processes that have been used to address encroachments when there are sufficient counter balancing reasons (for example in relation to Weld Street and Alexandra Road). We consider that a consistent approach will recognise strong reasons in cases such as ours and the analogous situation in Bell Road.

At the information meeting in Newtown Park a few weeks ago, one of the rationales given for restricting this road is that the only roads allowed access into the town belt are those which connect suburbs; we don't believe this is accurate. As there are also roads which solely reach private property such as Morton St in Berhampore which goes past the council nursery and on to Kilmarnock Heights rest home. This is paved, the city to sea walkway runs along it and it is a dead end to private property. Bay view terrace in Mt Victoria is a dead end sealed road going to private property and runs up into the town belt and Manchester Terrace leading to Truby King House and Capitol House also has access to private housing, there are others as well.

Carmichael road has been in existence for over 100 years and it is only by accident that it has not been paved and in constant use like the other roads mentioned. To block off Carmichael Road but not these others from private use is unreasonable given that access issue solutions have been resolved before.

The access road and recreational use of the Town Belt

We recognise the importance of the Town Belt for our city and agree that private encroachments should not interfere with its use for recreational purposes. In our view current usage of the access road by local residents does not adversely affect its recreational use.

Because the road follows closely to the edge of the Town Belt through to a dead end it does not create a thoroughfare through it. While the road is a utility access and must remain, it also provides users a pathway enabling them to enjoy the Town Belt without further impacting on the area.

Vehicular usage of the access road is not high and it has not caused any problems for its recreational use that we are aware of. In fact recreational and residential usage has coexisted for decades since the land was gifted for the Town Belt. As it is now unsealed and relatively corrugated the road cannot be traversed at any speed. Residents are very conscious of the other users of the

track and will always drive slowly; the current state of the road ensures any other users also must travel slowly.

Options

Despite the draft plan stated conclusion we believe there are other options to research and consider. Several options put forward by contributors to this submission are listed below.

Completing the paper roads of Coromandel St and Lawrence St

In our discussions with Council officials, we have been told that sealing the Coromandel St and Lawrence St road reserves is not really an option, but we are not aware whether an engineer's assessment of this has been carried out.

Improvements to parking at the southern end of Coromandel St

This has been tried with WCC Transport engineers maximising the available parks. The potential properties under construction make this option unlikely to be an effective solution for all affected residents.

Access on demand / by arrangement through the Town Belt

Whilst this provides a solution for one off things like building or moving, this does not address the parking and access issues for all the affected residents. There are 18 properties that would regularly apply for this if this was the only option this would create additional and unnecessary administration for the council.

Access remaining through the Town Belt on the road maintained to existing standards (i.e. Status Quo)

The road could be maintained to a level required for safe access to the utilities and to maintain the land and trees. This option keeps the road in a state that requires slow speed, is not expensive to maintain and reflects the status quo and does not impact other users of the town belt.

Reviewing Carmichael road for potential as a legal Road

There is no doubt the road was created, whether for maintenance of the farm land, access to the farm property (now 15 Kotinga Street) or perhaps a road linking the town and country.

We don't believe forming this as legal road is necessary and therefore view this as a less desirable option than approving access and may result in increased use and higher speeds.

Summary and our recommended option

We recognise that Council officers need to review the vehicular access to the Carmichael Reservoir as part of their work in ensuring that the Town Belt is maintained as a recreational resource.

We believe that our current use of the road has no negative impact on the Town Belt or its recreational use by the public. Continued use of the existing road to access our properties is a logical and pragmatic solution to access and parking issues created by the terrain, the original town planning and ongoing infill development.

We advocate that Council allows residents to continue using the road for parking and access purposes. This will:

- Avoid further contributing to the congested parking in southern Coromandel Street
- allow residents reasonable access to their properties without causing problems for other users
- allow residents with physical disabilities, elderly dependents or visitors continued access
- avoid expensive and less satisfactory alternatives
- enable the continued use of the Town Belt as a recreational resource
- avoid unnecessary restriction of any further intensification of housing developments in the area

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- Provide a solution that the council has granted to other residents on the Town Belt boundary.

Recommended changes to the Draft Plan

We request that Council consider the following changes to the proposed wording for the Town Belt Management Plan. Words ~~struck out~~ should be deleted; words in *italics* added.

9.6.8 The following activities are specifically prohibited:[...]

- e. ~~permanent~~ *uncontrolled* private vehicle access

[...]

Rationale: clearly, private vehicle access is allowed or encouraged in many parts of the Town Belt, for example for access to recreational facilities. The principles of the Plan are better served by specifying that vehicle access should be controlled or managed.

9.6.9 Encroachments. [...]

There are 206 known encroachments on the Town Belt covering ~~2.5626ha~~ [*replace with accurate figure*] as of June 2012.

These are broken down as follows:

- 77 gardens/lawns and or plantings
- 13 partial house encroachments
- 8 pedestrian access-ways
- 69 structures such as clotheslines, garden sheds, compost bins and so on
- 35 vehicle accesses from parking places through to larger access routes, ~~such as Carmichael Reservoir.~~

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Rationale: As written, this statement is false. Attachment 1, supplied by Council officers, marks only a small area at the south end of Coromandel St as 'encroachment'. The utility access route is not classified as 'encroachment'.

~~9.6.9.1 Encroachments are a prohibited activity.~~

9.6.9.2 The Council will resolve ~~the~~ existing encroachments with a view to ~~regaining lost~~ ~~land~~ *and increasing the usable area of the Town Belt.*

9.6.9.3 The Council will protect the Town Belt from new encroachments.

Rationale: Clause 9.6.9.1 contradicts many other clauses in the Plan which allow, encourage, and formalise various forms of encroachment. Management of the Town Belt is well protected by clauses 9.6.9.2 and 9.6.9.3.

Further, the suggested change to section 9.6.9.2 would encourage Council to seek creative options, including but not limited to land swaps and purchases, that would enable the Town Belt to grow over time.

9.6.9.9 If the encroachment is associated with private vehicle or private pedestrian access

and immediate removal is complicated by long-term historic use, then a longer term removal agreement such as a fixed-term licence may be negotiated. This will allow agreement of reasonable terms while also ensuring that the access encroachment is removed as per policy 9.6.9.1, 9.6.9.2 and 9.6.9.3. ~~The maximum period of time for this type of agreement will be until there is a change of ownership or occupation in the property associated with the encroachment.~~ The Council may limit access to manage the removal process by, for example, installing gates, specifying access hours and days, limiting numbers of people and/or vehicles.

Rationale for change: This clause (as modified) would enable Council to manage and control private access to the Town Belt. However, the maximum time limit should be deleted; not only would it be a significant change in Council Policy, it would unduly restrict Council flexibility to manage the Town Belt. The change in occupation is simply unfair to rental tenants. Overall, the issue is better addressed by the proposed section 9.6.9.14:

9.6.9.14 Any managed removal agreement does not run with the land. Any new owner will have to apply for an agreement. It is expected that change of property ownership will often be the point at which a licence will end and the encroachment is removed or access

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stopped.

Rationale: This clause as written better states the intent of the Town Belt plan, without restricting the options available to Council.

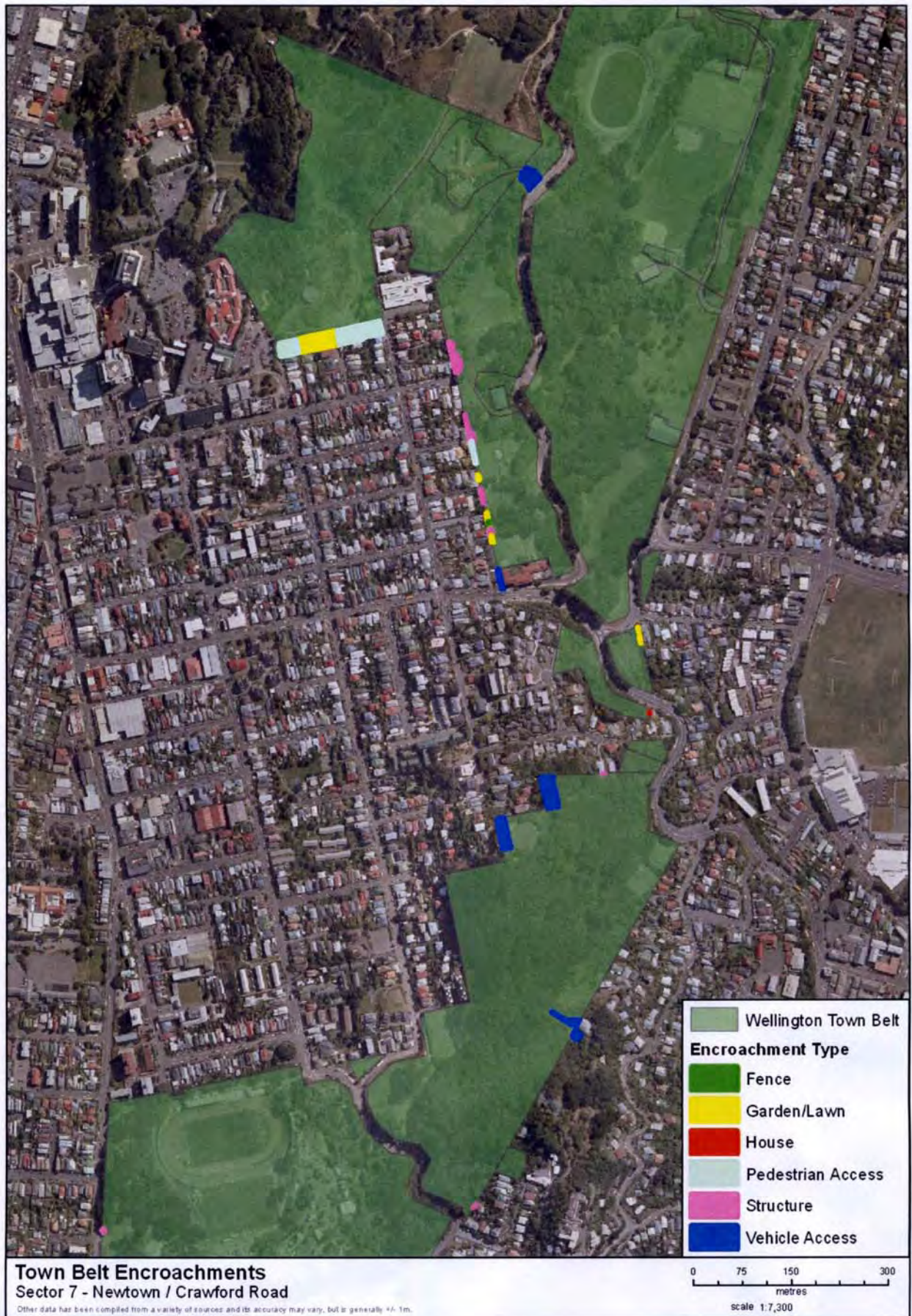
9.6.9.17 Town Belt land will not be sold to resolve encroachment issues *unless as part of a transaction that results in a net gain to the Town Belt.*

Rationale: This clause should be more flexible, creating options for Council to increase the Town Belt while retaining room for creative solutions. We understand that under the proposed Town Belt Act, the Council will for the first time have legislative authority to alter Town Belt boundaries. However, the draft Plan suggests that special legislation will be required to realign Mt Albert Rd. Allowing swaps subject to a requirement of net gain would be more flexible.

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Attachment 1: Council plan used to define and measure encroachments

Supplied by Mike Oates, Manager Open Space and Planning, 4 December 2012.



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Submission 211

From: Jules Bailey-Rotman [Jules.Bailey-Rotman@grouponnz.co.nz]
Sent: Monday, 10 December 2012 3:08 p.m.
To: Megan Dunning
Subject: Submission
Attachments: IMG.pdf; IMG_0001.pdf; IMG_0002.pdf; IMG_0003.pdf

Please see the attached two submissions.

Warm regards

Jules Bailey-Rotman

Business Development Manager



GROUPON AUSTRALIA & NEW ZEALAND

m| +64 210 417 419

e | jules.bailey-rotman@grouponnz.co.nz

w| Grouponnz.co.nz

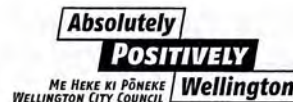


[Forbes Magazine](#): "Meet the Fastest Growing Company Ever"

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TOWN BELT LEGISLATIVE AND POLICY REVIEW SUBMISSION FORM



Help us protect the Town Belt by commenting on:

- the draft Town Belt Management Plan
- some proposed legislative changes to strengthen its governance.

You can have your say:

- By making a submission on this form or in writing and send it to us by **Monday 10 December 2012**.
 - Post: Freepost, Parks and Gardens (REPL01), Wellington City Council, PO Box 2199, Wellington 6140
 - Fax: 801 3155
- By making a submission online at Wellington.govt.nz
- By sending an email to: townbelt@wcc.govt.nz
- You may also make an oral submission to Councillors. To do this, tick the box below and provide your contact details.

Please phone 499 4444 for more information.

ENTER YOUR NAME AND CONTACT DETAILS	
* Mandatory fields	
Mr / Mrs / Ms / Miss / Dr (Please circle which applies)	
First name* Jules	Last name* Bailey-Rotman
Street address* 186 Abel Smith Street	
Suburb Te Aro	City Wellington
Phone/mobile 021 091 7419	Email J.baileyrotman@gungl.com

MAKING A SUBMISSION	
I am making a submission	<input checked="" type="checkbox"/> As an individual <input type="checkbox"/> On behalf of an organisation
Name of organisation	
I would like to make an oral submission to the City Councillors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, provide a phone number above so that a submission time can be arranged.	

SUBMISSIONS CLOSE 5PM ON MONDAY 10 DECEMBER 2012.

Privacy statement

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

DO YOU HAVE ANY COMMENTS ON WHAT THE DRAFT PLAN PROPOSES?

If you have read the draft plan, please provide the policy number and page number too.

Theme, sector or policy and page number	Comment
Theme A sector 3 page 7	Replacement of crown land of equal or greater landscape, ecological value to the gully supports a huge amount of native bird life & is a breeding area for many of these. Known species are kaka, kakariki, tui, war eye, grey wobbler. I have taken video footage which shows kaka calls, and the gum tree alone often has over 10 tui in it, and holds ecological value.
Theme D sector 3 page 8	The council will enhance & protect unique landscape. As pointed out above the land has ecological uniqueness & value. There are many native trees in the gully & whilst the gum is not native it is unique & offers not only bird sanctuary as well as a view that can be enjoyed from a large amount of Aro Huianga residents.
Theme E sector 3 page 9	Restoring indigenous habitats on the town Belt. As mentioned the gully supports a large & diverse range of native birds. Kaka are present most days & tui, war eyes & grey wobblers are consistently in the gully & nest there. Kakariki also come through & land in the gully.
Theme G sector 3 page 10	The council intends to take significant European & Maori historical & cultural values into account when making decisions about the town Belt. The fact that the school & grounds were the original prison & the fact the gully was used as prison land gives it historical significance & should therefore be retained.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

For example, is there anything you feel has not been adequately covered by the draft plan. (Please attach any additional pages.)

I have video clips of the native bird life.

SECTION TWO – PROPOSED LEGISLATIVE CHANGES

Do you support or oppose the overall objectives of the proposed legislative change? (please circle)

1 Strongly oppose 2 Oppose 3 Neither support nor oppose 4 Support 5 Strongly support

Why do you say this?

I think the gully does hold value on the above grounds and should be included in the town belt & protected from development as a result.

DO YOU HAVE ANY COMMENTS ON THE PROPOSED LEGISLATIVE CHANGES?

For example, tell us what you think about the statutory principles and the Council's powers, such as the maximum term for a lease. If you have read the full drafting instructions please provide the paragraph number too.

Number	Comment

TOWN BELT LEGISLATIVE AND POLICY REVIEW SUBMISSION FORM



Help us protect the Town Belt by commenting on:

- the draft Town Belt Management Plan
- some proposed legislative changes to strengthen its governance.

You can have your say:

- By making a submission on this form or in writing and send it to us by **Monday 10 December 2012**.
 - Post: Freepost, Parks and Gardens (REPL01), Wellington City Council, PO Box 2199, Wellington 6140
 - Fax: 801 3155
- By making a submission online at Wellington.govt.nz
- By sending an email to: townbelt@wcc.govt.nz
- You may also make an oral submission to Councillors. To do this, tick the box below and provide your contact details.

Please phone 499 4444 for more information.

ENTER YOUR NAME AND CONTACT DETAILS	
* Mandatory fields	
Mr / Mrs / Ms / <u>Miss</u> / Dr (Please circle which applies)	
First name* <u>Arpita</u>	Last name* <u>Dutta</u>
Street address* <u>186 Abel Smith street</u>	
Suburb <u>Te Ara</u>	City <u>Wellington</u>
Phone/mobile <u>022 107 8013</u>	Email <u>arpita.dutta@ajpark.com</u>

MAKING A SUBMISSION	
I am making a submission	<input checked="" type="checkbox"/> As an individual <input type="checkbox"/> On behalf of an organisation
Name of organisation	
I would like to make an oral submission to the City Councillors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, provide a phone number above so that a submission time can be arranged.	

SUBMISSIONS CLOSE 5PM ON MONDAY 10 DECEMBER 2012.

Privacy statement

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

TOWN BELT LEGISLATIVE AND POLICY REVIEW

Overall, do you support or oppose the general direction of management for the Town Belt? (please circle)

1 Strongly oppose 2 Oppose 3 Neither support nor oppose 4 Support 5 Strongly support

Why do you say this?
 For the most part I support the direction but I feel this land holds significance for the various reasons stated and should therefore be retained under the town belt

SECTION ONE – DRAFT TOWN BELT MANAGEMENT PLAN

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? (please circle)

1 Strongly oppose 2 Oppose 3 Neither support nor oppose 4 Support 5 Strongly support

Why do you say this?
 Identified areas exclude other areas that offer environment & breeding for bird life as well as breaking up residential areas

The plan proposes criteria for assessing land to be added to the Town Belt (chapter 2 of draft plan). To what extent do you support or oppose the criteria? (please circle)

1 Strongly oppose 2 Oppose 3 Neither support nor oppose 4 Support 5 Strongly support

Why do you say this?
 criteria is narrow and does not adequately comply with principles 1,4,5&6

The plan proposes to restore and enhance ecosystems and increase the indigenous vegetation cover on the Town Belt (chapter 5 of draft plan). To what extent do you support or oppose this? (please circle)

1 Strongly oppose 2 Oppose 3 Neither support nor oppose 4 Support 5 Strongly support

Why do you say this?

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? (please circle)

1 Strongly disagree 2 Disagree 3 Neither agree nor disagree 4 Agree 5 Strongly agree

Why do you say this?

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? (please circle)

1 Strongly oppose 2 Oppose 3 Neither support nor oppose 4 Support 5 Strongly support

Why do you say this?
 we need to encourage sport for its social & health benefits

Submission 152

From: mdavies [mdavies@orcon.net.nz]
Sent: Monday, 10 December 2012 3:32 p.m.
To: Megan Dunning
Subject: Town Belt Legislative and Policy Review

Kia Ora

I am emailing on Behalf of the Clifton Tce Model School Parent teacher Association.

Matthew Davies
C/O Clifton Tce Model School PTA
Phone: (04) 472 7519
Fax: (04) 472 8204
Clifton Terrace Model School is located at:
15 Clifton Terrace
Kelburn
Wellington

I would welcome the opportunity to make an oral submission.

I am writing with regards to the reserve land immediately opposite the school that forms a point between Talavera Tce and Clifton Tce.

It has come to our attention that this land may be sold as part of the town belt legislative policy review.

The CTMS PTA strongly opposes any move to sell this land to private interests.

The resulting development that would be inevitable should the land fall in to private ownership would severely compromise the ability of the school to function.

CTMS would lose it's only available parking space and this would force parents to park on the road, creating congestion and danger for pupils.

If the land was to be developed into town houses or apartments for example the resulting demand for places would overwhelm the school.

The few green spaces that are left in the CBD are havens for native birds and wildlife and contribute to what is a positively Wellington environment. the loss of this green space would be a tragedy for Tui/Kaka and other bird life. Not mention the biodiversity of the fauna in the region.

CTMS has a unique approach and have shown that they can be custodians of public space, a better option would be to turn this area into recreation space for

Submitters - Monday 18 February 2013

all of Wellington to enjoy. CTMS could work with the Council on these initiatives.

In conclusion, we feel that

The noise, danger and chaos that would be created, should development of the point be undertaken would fundamentally threaten the ability of the school to function, and destroy a part of the environment that makes us uniquely positively Wellington.

Thank you for hearing our submission.

Best regards
Matthew Davies