

Town Belt Zone

Wellington Civic Trust Submissions and Speaking Notes for Hearing 7 (specific wording suggestions highlighted in grey)

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Part of Plan	Our submission	Details	Analysis and Requested Change
<p>WTBZ - O1 Purpose</p>	<p>Support in part While we supported in part, we noted that some important concepts in the principles of the Town Belt Act were not reflected in the Objective which purports to set out the "predominant values" of the zone.</p>	<p>We sought the following additional recognitions (taken from the principles in the Town Belt Act 2016 – see Appendix 1 to this statement):</p> <ul style="list-style-type: none"> • Large areas of landscape value • Areas, places, associations and structures of cultural heritage significance • Existing ecosystem values, which must be sustained and enhanced (this extends beyond the recognition of vegetation, which is already mentioned) 	<p>The S42A report accepts that cultural heritage values have been omitted, and recommends including a new item 4 "Historic and cultural heritage values, including the presence of Sites and Areas of Significance to Maori, notable trees and heritage structures". We appreciate that inclusive suggestion.</p> <p>However, the landscape and ecosystem values which are so important in the principles in the Act are not mentioned in the Objective for the Zone. They should be. Some parts of the Town Belt have landscape overlays in the Proposed Plan which should be sufficient to justify mention on landscape in the Objective. The "patchwork of vegetation of varying types" referred to in the section 42A report falls far short of the legislative requirement to support healthy indigenous ecosystems.</p> <p>We therefore propose that, if the Hearing Panel is not of a mind to accept bullet-points 1 and 3 in our submission, the following wording is included in addition to the new item 4 in the officer's report:</p> <p>WTBA-01, item 1, is modified to read: "large areas of public open space with a high degree of</p>

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			<p>accessibility, and landscape values which must be protected and enhanced”.</p> <p>WTBA-01, item 3, is modified to read: “a patchwork of vegetation of varying types, with the proportion of native vegetation n increasing through continued planting and regeneration, to support healthy indigenous ecosystems”.</p>
<p>WTBZ – O2 Managing Effects</p>	<p>Support in part We sought management of activities within the zone, as well as at zone edges.</p>		<p>We agree with the Section 42A report recommendation.</p>
<p>WTBZ – P2 Managed Activities</p>	<p>Support in part This policy comes into play when resource consents are involved. It sets out matters to which “particular regard” must be had in decision-making. We consider there is one key matter missing.</p>	<p>The missing matter is the compatibility between activities where they occur on Town Belt land. We note that effects on residential amenities have to be minimised. We are not going that far with our suggestion, but rather promoting a “consideration” which relates to compatibility for all activities when a resource consent is sought. This is an important issue, particularly as the city intensifies and more pressure comes on remaining open space.</p>	<p>The officer’s report appears to confuse permitted activities and activities that require consents, to which this policy applies.</p> <p>We seek that a further item is added to WTBZ-P2 which reads: <u>“5. Adverse effects between activities are able to be avoided or limited to an appropriate level”.</u></p>
<p>WTBZ-R6</p>	<p>Oppose Rules for Enabled Activities – Footpaths and tracks</p>	<p>This permitted activity is far too generous. New footpaths and tracks require careful assessment as to their impact on the natural environment and other activities. That is particularly the case as</p>	<p>The rules applying in the Proposed Town Belt Zone would allow for major new works as permitted activities, and thus the potential erosion of the natural character of the Town Belt and potentially undermining its statutory</p>

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		<p>there are no accompanying standards such as volume of earthworks, width of tracks and footpaths, amount of vegetation removal, etc. We seek that the rule is modified to permit maintenance of existing footpaths and tracks, but that any new such facilities are subject to consent processes. Given the importance of the Town Belt to Wellington, we consider this is an essential change. We do not accept the officer's report assertion that as only the Council or its contractors can do this work, there is sufficient protection. Councils are subject to pressure from groups, organisations, and individuals and the permitted status leaves no independent rights to review proposals.</p>	<p>purposes and principles (both in the Town Belt Act and the Plan).</p> <p>We seek that the Rule is amended as follows: WTBZ-R6 Maintenance of Construction of, and alteration and additions to footpaths and tracks 1. Activity status: Permitted</p> <p>This would mean that new footpaths and tracks which went beyond a reasonable interpretation of maintenance would be subject to consideration as discretionary activities.</p>
<p>WTBZ-R7</p>	<p>Oppose Rules for Enabled Activities – Parking Areas and Vehicle Access</p>	<p>This permitted activity is far too generous. New car parking areas and vehicle accesses require careful assessment as to their impact on the natural environment and other activities. That is particularly the case as there are no accompanying standards such as volume of earthworks, extent of carpark area or access, amount of vegetation removal, etc. We seek</p>	<p>The rules applying in the Proposed Town Belt Zone would allow for major new works as permitted activities, and thus the potential erosion of the natural character of the Town Belt and potentially undermining its statutory purposes and principles (both in the Town Belt Act and the Plan).</p> <p>We seek that the rule is amended as follows: WTBZ-R7 Maintenance of Construction of, and alteration and additions to car parking areas and vehicle accesses.</p>

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		<p>that the rule is modified to permit maintenance, but that any new such facilities are subject to consent processes.</p> <p>Given the importance of the Town Belt to Wellington, we consider this is an essential change. We do not accept the officer's report assertion that as only the Council or its contractors can do this work, that is sufficient protection.</p> <p>Councils are subject to pressure from groups, organisations, and individuals and the permitted status leaves no independent rights to review proposals.</p>	<p>1. Activity status: Permitted</p> <p>This would mean that new car parking areas and vehicle accesses which went beyond a reasonable interpretation of maintenance would be subject to consideration as discretionary activities.</p>
<p>WTBZ-S4</p>	<p>Oppose Remove rule that applies a 5% building coverage within the Zone.</p>	<p>We consider this rule is superfluous in the Town Belt.</p> <p>Most of the "sites" (defined as "the percentage of the net site area covered by the building footprint") within the zone are very large (eg one of the Tinakori Hill blocks is over 70ha). For smaller blocks, the rule does no more than the rule controlling the maximum gross floor area. If applied to leased areas (as may be possible under the definitions), it could result in much larger areas being leased than necessary to stay within the rule.</p>	<p>The maximum 30m² area rule in WTBZ-S3 is sufficient control. The criteria with this rule are in any case the same as for a 30m²+ building. Having the rule sends the wrong message in terms of acceptable site coverage. We find it hard to envisage the situation where multiple small buildings or an extension to a larger building (situations cited in the officer's report) would actually trigger this rule.</p> <p>Please delete this confusing and unnecessary rule.</p> <p>Delete WTBZ-S4</p>

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4 Principles

(1) In performing its role as trustee of the Wellington Town Belt, the Council must—

- (a) recognise and provide for the protection and enhancement of the Wellington Town Belt for future generations;
and
- (b) have particular regard to the following principles:
 - (i) the Wellington Town Belt should be managed in partnership with mana whenua;
 - (ii) the landscape character of the Wellington Town Belt should be protected and enhanced, including by recognising that it was the New Zealand Company's intention that the original Town Belt not be built on;
 - (iii) the Wellington Town Belt should support healthy indigenous ecosystems;
 - (iv) the Wellington Town Belt should be accessible to all and for all to enjoy;
 - (v) the Wellington Town Belt should be available for a wide range of recreational activities;
 - (vi) community participation in the management of the Wellington Town Belt should be encouraged and supported;
 - (vii) the historic and cultural heritage of the Wellington Town Belt should be recognised and protected.

(2) The principles in subsection (1)(b) must be considered together and the order in which the principles are set out is not to be taken as specifying any order of importance or priority.