BEFORE THE INDEPENDENT HEARING PANEL APPOINTED TO HEAR AND MAKE DECISIONS ON SUBMISSIONS AND FURTHER SUBMISSIONS ON THE PROPOSED LOWER HUTT DISTRICT PLAN

IN THE MATTER of the Resource Management Act 1991 (the Act)

AND

IN THE MATTER of Hearing of Submissions and Further Submissions on the Proposed Lower Hutt District Plan under Schedule 1 of the Act

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STATEMENT OF EVIDENCE OF EMILY LEVENSON

ON BEHALF OF WELLINGTON REGIONAL COUNCIL

MONDAY, 23 NOVEMBER 2026

Summary of Evidence

1 This evidence relates to the notices of requirement (**NOR**) for three new designations for regional park purposes:

1.1 WRC-12 Belmont Regional Park

1.2 WRC-13 East Harbour Regional Park

1.3 WRC-14 Wainuiomata Regional Park

2 The Section 42a report has recommended withdrawing these three notices of requirement. Greater Wellington continues to seek these designations, and we would welcome the opportunity to collaborate with Hutt City Council (**HCC**) on conditions for the designations to resolve their concerns.

3 Greater Wellington considers that these designations will be beneficial to protect the three regional parks for recreation and conservation into the future. The explanation for using the designation mechanism and the benefits that will come with it are detailed in this evidence, organised under the following topics:

3.1 How Greater Wellington manages regional parks

3.2 Benefits of designations for regional parks

3.3 Section 176 powers and existing parks designations

3.4 Effect of overlays in the Operative District Plan

3.5 Efficiency of consenting

3.6 Exemption from the outline plan process

3.7 Matters of national importance

3.8 Historic heritage

3.9 Overlap with existing designations

3.10 Alternative sites, routes or methods and whether the designation is reasonably necessary

3.11 Balance of positive environmental effects

3.12 Response to submissions

Qualifications and experience

4 My name is Emily Levenson. I am a Policy Advisor in the Environmental Policy team at Greater Wellington Regional Council.

5 I hold a Bachelor of Science in Urban Studies and Planning from the Massachusetts Institute of Technology (MIT) and a Post-graduate Certificate of Commerce from Lincoln University.

6 I have over three years of experience in planning and resource management policy in New Zealand. I have previously submitted on district and regional plans and plan changes as an industry advocate for a primary sector levy body, including the Wairarapa Combined District Plan, the Wellington Regional Policy Statement Change 1 and the Wellington Natural Resources Plan Change 1.

Code of conduct

7 I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and have complied with it when preparing this report. Other than where I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

8 In preparing this evidence, I have referred to the following:

8.1 The Section 42A Officers' Report for Hearing Stream #9 – Designations

8.2 The Proposed Lower Hutt District Plan (**PDP**)

8.3 The Operative City of Lower Hutt District Plan (**ODP**)

8.4 The Notice of Requirement for a public work, being Belmont Regional Park, in the City of Lower Hutt District Plan

8.5 The Notice of Requirement for a public work, being East Harbour Regional Park, in the City of Lower Hutt District Plan

8.6 The Notice of Requirement for a public work, being Wainuiomata Regional Park, in the City of Lower Hutt District Plan

8.7 Relevant sections of the Resource Management Act 1991 (**RMA**)

8.8 Relevant sections of the Reserves Act 1977 (**Reserves Act**)

8.9 Toitū Te Whenua Parks Network Plan 2020-30 (**Parks Network Plan**)

9 In preparing this evidence, I have also spoken to Greater Wellington's parks planner and members of Greater Wellington's Delivery department who are responsible for parks management.

Scope of evidence

10 My evidence addresses Greater Wellington's notices of requirement for three new parks-related designations.

11 Table 1 sets out the complete list of roll-over designations and NOR sought by Wellington Regional Council and the scope of my evidence and Rachel Pawson's evidence.

Table 1: Greater Wellington rollover designations and NORs

ODP code	PDP code	Requiring authority	Designation title	Evidence presented by WRC
WRC 1		Deleted by request from WRC		Deleted. No evidence presented
WRC 2	WRC-01	WRC	Wellington Regional Council Depot	Roll-over. Support reporting officer recommended changes. No evidence presented.
WRC 3	WRC-02	WRC	Flood Mitigation Stopbank (Wainuiomata)	Roll over. No changes recommended. No evidence presented.
WRC 4	N/A	WRC	Water Supply Pumping Station (Waterloo Interchange)	Designation transferred to Tiaki Wai. WRC no longer has an interest.
WRC 5	N/A	WRC	Water Supply Pipeline (Wainuiomata)	Designation transferred to Tiaki Wai. WRC no longer has an interest
WRC 6	N/A	WRC	Water Supply Pumping Station (Petone Recreation Ground)	Designation transferred to Tiaki Wai. WRC no longer has an interest
WRC 7	N/A	WRC	Water Supply Pumping Station (Haywards Hill)	Designation transferred to Tiaki Wai. WRC no longer has an interest

WRC 8	N/A	WRC	Water Supply Reservoirs (Haywards Hill)	Designation transferred to Tiaki Wai. WRC no longer has an interest
WRC 9	N/A	WRC	Water Supply Pumping Station (Waione Street)	Designation transferred to Tiaki Wai. WRC no longer has an interest
WRC 10	N/A	WRC	Wainuiomata - Orongorongo Water Collection and Conservation Area	Designation transferred to Tiaki Wai. WRC no longer has an interest.
WRC 11	WRC-09	WRC	Boulcott Stopbank	Roll-over with modification to remove construction related conditions and replace with conditions to manage maintenance and upgrade of the stopbank. Reporting officer has recommended the proposed modifications be confirmed. No evidence presented.
WRC 12	WRC-10	WRC	RiverLink - Construction and maintenance of flood protection works	Roll over with modification. Officer recommendations are addressed in evidence of Rachel Pawson
WRC 13	WRC-11	WRC	RiverLink - Construction, operation and maintenance of a new Melling Station and associated infrastructure	Roll over with modification. Officer recommendations are addressed in evidence of Rachel Pawson
NOR	WRC-12	WRC	Belmont Regional Park	New designation. Officer recommendations are addressed in evidence of Emily Levenson
NOR	WRC-13	WRC	East Harbour Regional Park	New designation. Officer recommendations are addressed in evidence of Emily Levenson
NOR	WRC-14	WRC	Wainuiomata Regional Park	New designation.

				Officer recommendations are addressed in evidence of Emily Levenson
NOR	WRC-15	WRC	Te Awa Kairangi / Hutt River flood protection and erosion control	New designation. Officer recommendations are addressed in evidence of Rachel Pawson

New Designations – Regional Parks

12 Greater Wellington has sought new designations via notices of requirement (**NOR**) for three regional parks subject to the PDP: Belmont, East Harbour and Wainuiomata Regional Parks. These designations are for regional park purposes, including recreation, conservation, protection, general park management, rural activities (in the case of Belmont) and any other activities permitted in the operative reserve management plan, including but not limited to the development, operation, construction, upgrade, maintenance and repair of parks assets and public spaces.

13 The reporting officer has recommended that the NOR for designations for Belmont, East Harbour and Wainuiomata Regional Parks be withdrawn. Greater Wellington continues to seek confirmation of the three parks NOR. We are open to working with HCC on possible amendments to the conditions of the NOR, including around indigenous biodiversity, heritage, the design of outline plan exemptions and other topics.

14 The following sections of this evidence describe the benefits of, and explanation for, using the designations mechanism for regional parks.

How Greater Wellington manages regional parks

15 Regional parks are a public good resource which provide for conservation of indigenous biodiversity, recreation and benefits to natural resources like freshwater water quality. Greater Wellington manages over a dozen regional parks and recreation areas, providing residents and visitors with public facilities such as campsites, trails for walking, cycling and horseback riding, and signage for educational, safety and navigational purposes. Conservation and recreation values are at the heart of Greater Wellington's parks management.

16 Greater Wellington manages eight of its regional parks under a parks network plan titled *Toitū Te Whenua,* which provides directions for management of these parks under the Reserves Act as well as the Local Government and Wellington Regional Water Board Acts.[1] Belmont, East Harbour and Wainuiomata parks are all managed by this plan. The purpose of designations WRC-12, WRC-13 and WRC-14 includes activities permitted in the operative reserve management plan, which in the case of these parks is *Toitū Te Whenua.*

17 *Toitū Te Whenua* focuses on managing parks in line with the plan's core values, which include (emphasis added):

*17.1 The **protection and enhancement of the environment** of parks and forests for future generations,*

17.2 High quality and diverse recreation experiences for health and wellbeing,

*17.3 **Cultural heritage** and **working alongside mana whenua** / mātauranga, and*

17.4 Collaboration and empowerment in the way we work.[2]

18 Greater Wellington's organisational purpose as a regional council includes stewardship of the environment. Hutt City Council and the Department of Conservation (**DOC**) are partial landowners of the regional parks in question and entrust Greater Wellington to manage the land through arrangements under the Reserves Act and the Local Government Act.[3] The parks network plan can provide further confidence that Greater Wellington is committed to keeping conservation and recreation at the heart of parks management.

Benefits of designating regional parks

19 Greater Wellington is seeking designations for Belmont, East Harbour and Wainuiomata Regional Parks in order to better protect these treasured public spaces and their conservation and recreation values.

20 Designating the regional parks will provide two primary benefits. One benefit is to protect the regional parks from other entities using this land in ways that could

[1] Greater Wellington (December 2020). Toitū Te Whenua Parks Network Plan 2020-30. Accessed online 17 November 2026. https://www.gw.govt.nz/your-region/plans-policies-and-bylaws/plans-and-reports/parks-plans/toitu-te-whenua-parks-network-plan-2020-30/. (p. 42)
[2] Ibid (p. 38-39)
[3] Ibid (p. 103, 122, 179)

prevent or hinder conservation and recreational purposes, including if land ownership changes or if another designation is sought for other purposes.

21 The second benefit is to create consenting efficiencies such that typical park management activities do not require resource consent. This is appropriate given that any adverse effects are usually well established and well known, less than minor, and contained within the parks. This is similar to the way that Crown conservation land is managed under section 4(3) of the RMA, in that sections 9(1) and 9(3) do not apply to any work that is consistent with a conservation management plan or strategy.

Section 176 powers and existing parks designations

22 Under section 176(1)(b) of the RMA, designations for the regional parks will restrict anyone other than Greater Wellington (the requiring authority) from carrying out any activity that, "would prevent or hinder a public work or project or work to which the designation relates" without written consent. In practice, this will enable Greater Wellington to ensure that activities that would prevent or hinder conservation, recreation and general park management (and rural activities, in the case of Belmont) in the parks will not be able to take place without good reason.

23 This benefit is well-stated in the Porirua District Plan 2025 with regard to the existing designation for Battle Hill Regional Park:

If land ownership changes, a designation (controlled by Greater Wellington Regional Council) will ensure that the land is maintained for public open space and potential water supply purposes. Other District Plan controls would provide lesser certainty that the land will maintained.[4]

In the case of Belmont, East Harbour and Wainuiomata parks, the wording of the purpose differs but the reasoning is the same.

24 Similarly, under s177, any requiring authorities for future designations will need to obtain the written consent of Greater Wellington before undertaking work where Greater Wellington is the primary designator. Again, this will give Greater Wellington more influence over activities that might impact the parks.

[4] Porirua District Council. Information for rolling over existing designations. Accessed online 19 November 2026. https://storage.googleapis.com/pcc-wagtail-media/documents/Rollover_information_and_correspondence_for_existing_designations.pdf

25 Greater Wellington has parks designations in other districts in the region, including:

25.1 Kaitoke Regional Park, recognised in the Operative Upper Hutt District Plan 2004, for the purposes of "Regional Park" with no conditions.[5]

25.2 Queen Elizabeth Park, recognised in the Operative Kapiti Coast District Plan 2021, for the purposes of "Regional Park and recreation reserve for the purpose of active and passive recreation including a golf course, conservation, production farming, facilities and buildings, associated with recreational, and operational activities of the Park" with no conditions.[6]

25.3 Battle Hill Regional Park, recognised in the Operative Porirua District Plan 2025, for the purposes of "Regional Recreation Purposes and Water Supply Purposes" with no conditions.[7]

26 In preparing this evidence, I have spoken to Claire McKevitt, Team Leader Consents Management Delivery at Greater Wellington. She provided me with further information about these designations, including their purposes and exemptions from outline plan of works requirements, which are included in Appendix 1 of this evidence.

Effect of overlays in the Operative District Plan

27 The geographic area of the designations sought for Belmont, East Harbour, and Wainuiomata Regional Parks predominantly fall within the Natural Open Space Zone of the PDP. As described in the PDP, this zone is "primarily used for conservation and a range of recreation activities" and "built development within the zone is primarily the development necessary to support conservation and recreation activities as well as infrastructure with a functional or operational need to be in a location within the zone".[8] I agree with the S42A report that the provisions for the Natural Open Space Zone (NOSZ) are enabling for regional park management.

28 Matters of national importance under the RMA are still managed under the ODP, rather than the PDP, due to circumstances related to the "plan stop", so ODP

[5] Upper Hutt District Plan 2004. WRC1 Regional Park.
[6] Kapiti Coast District Plan 2021. WRC-001 Queen Elizabeth Park.
[7] Porirua District Plan 2025. GWRC-03 Regional Recreation and Water Collection Area (Battle Hill Regional Park).
[8] Proposed Lower Hutt District Plan. NOSZ – Natural Open Space Zone.

overlays related to significant indigenous vegetation, historic heritage and sites of significance to Māori continue to apply.

29 All three parks in question are subject to Significant Natural, Cultural and Archaeological Resource (SNR, SCR, and/or SAR) overlays under the ODP, shown in Appendix 2, which I consider are more restrictive that the NOSZ provisions.

30 Under the ODP, preservation works are a permitted activity, while all other activities are restricted discretionary.[9] Table 2 shows the expected activity status for activities listed in the purpose of the regional parks NORs under the ODP overlays.

Table 2: Activity status in significant natural areas overlay in the Operative District Plan

Activity	**Activities in purpose of regional parks NOR**	**Activity Status in ODP SNR Overlay**
Activities and works associated with the protection, preservation, enhancement and conservation of significant natural, cultural and archaeological resources.	Ongoing operation, maintenance and development activities associated with the regional park for **restoration** and **conservation purposes**	Permitted activity (14E 2.1)
Any activity or site development works identified on or within the boundaries of a significant natural resource	Ongoing operation, maintenance and development activities associated with the regional park for **recreational** and **general park management activities**	Restricted discretionary activity (14E 2.2)

[9] City of Lower Hutt District Plan. 1.10.9 Significant Natural, Cultural and Archaeological Resources.

31 Under this overlay, general park management activities and activities for recreation, rather than conservation, purposes would be restricted discretionary. This means that resource consent is required, with matters of discretion related to the extent and effects of the works under provision 14E 2.2.1. The assessment includes the extent to which the significant natural resource is to be modified, damaged or destroyed, the extent to which the proposal may compromise natural character, visual amenity and landscape values, the impact on the coastal environment, and the recognition and protection of cultural significance.

32 For instance, Greater Wellington would need to seek resource consent from HCC for any new recreation activity or maintenance activity not explicitly for conservation purposes within these overlays. These new activities could sometimes include track formation, installing visitor amenities like toilet blocks and wayfinding signage or creating firebreaks.

33 Between 2020 and 2025, Greater Wellington has had six consents approved by Hutt City Council for East Harbour Regional Park for similar activities. Under a designation, these activities would not require consent.

Efficiency of consenting

34 The reporting officer notes that many of the activities to be enabled under the NOR are permitted activities under the ODP and PDP, whereas future works may require an outline plan under a designation, which would not contribute to efficiency of consenting (para 423). Because of the SNR overlays discussed in the previous section, recreational and general management activities have restricted discretionary status under the ODP. Thus, a designation would provide consenting efficiencies for those activities because they would no longer require consent. The outline plan exemptions included in the NOR are intended to mirror permitted activities under the PDP, so activities otherwise permitted would not require outline plans.

Exemption from outline plan process

35 The reporting officer states that they do not think the provisions in the NOR which seek to exempt activities from outline plan requirements can override outline plan requirements (para 423).

36 Waiving outline plan requirements for regional parks designations is a precedented approach taken by Auckland Council. As shown in Appendix 3, Condition 3 of

Designations 400, 401, 402, 403, 404, 415, 416, and 418 of the Auckland Unitary Plan exempts listed works (e.g. tracks, buildings, structures) from an outline plan of works, except where the works involve a scheduled heritage place, pursuant to section 176A (2) of the RMA.[10]

37 The reporting officer expressed concern that activities such as the construction of new buildings, vegetation removal and commercial activities managed under the reserves management plan will not be subject to consideration of adverse effects on the environment from these activities (para 414). However, I consider that conditions on the designation can be used to ensure effects are equally considered.

38 In addition, as evidenced by the text related to Battle Hill Regional Park in Appendix 1, other councils have accepted that a parks network plan under the Reserves Act can be sufficient to manage environmental effects of the activities it authorises.

Matters of national importance

39 The reporting officer considers the enabling provisions in the NOR for activities permitted in a reserve management plan do not provide for due consideration of Part 2 of the RMA (para 415) and that the NOR does not provide a comprehensive alternative to consideration of matters of national importance (para 408, 427).

40 The report does acknowledge that the accidental discovery protocol for archaeological matter, waahi tapu, taonga or koiwi is “a suitable approach” for managing the cultural values associated with significant cultural or archaeological resources (para 407).

41 As Greater Wellington stated in the NOR for Belmont Regional Park, designating the regional parks will assist in recognising and providing for matters of national importance because the designation will help prevent inappropriate subdivision, use or development of regional park space.[11] The purpose of a designation for the regional parks is to protect the public goods associated with regional parks, including the protection of indigenous biodiversity, protection of historic heritage and providing public access to waterbodies. Regional parks also have recreational

[10] Auckland Council. Unitary Plan: Designation Schedule. Accessed online 17 November 2026. https://unitaryplan.aucklandcouncil.govt.nz/images/Auckland%20Unitary%20Plan%20Operative/Chapter%20K%20Designations/Auckland%20Council.pdf
[11] NOR for Belmont Regional Park (p. 34-35).

purposes, and rural activities in the case of Belmont Regional Park. Conservation, recreation and rural activity values are balanced under the parks management plan.

42 Greater Wellington is open to meeting with Hutt City Council to discuss amendments to the conditions of the designations for these regional parks to better give effect to s6 of the RMA if the current conditions are not adequate.

Historic heritage

43 The s42A report notes that the conditions of the Belmont Regional Park NOR do not include protecting historic heritage at Korokoro Dam (para 413).

44 The NOR for Belmont Regional Park outlines Greater Wellington's approach to heritage buildings, structures and areas in section 4.6, including the following:

External alterations of or additions to heritage buildings/structures are generally only required to preserve the function of the building/structure, and to ensure public safety. Full or partial removal or demolition of a heritage building/structure would only occur due to public safety concerns. GW would usually choose to fence off an unsafe heritage building/structure and install signage to warn of the risks, rather than demolition. New buildings or structures within historic heritage areas would be developed only where necessary in accordance with the reserves management plan and therefore would be consistent with the purpose of the designation.

In the draft District Plan (December 2023 version), the Korokoro dam and the WW2 ammunition stores in Belmont Regional Park are identified as heritage buildings/structures.

Separately to this NOR, the provisions of the Heritage New Zealand Pouhere Taonga Act 2014 may still apply to these activities.[12]

45 *Toitū Te Whenua* consistently recognises the heritage of Korokoro Valley and highlights plans to protect the heritage and enhance its enjoyment with signage and storytelling, which a designation will support.

46 Greater Wellington is open to amending the conditions of the designation to better recognise historic heritage if necessary.

[12] NOR for Belmont Regional Park (p. 20).

Overlap with existing designations

47 The s42A report notes that new designation WRC-14 lies within the same area as existing designation WRC-08 Wainuiomata – Orongorongo Water Collection and Conservation Area and Treatment Plant (para 428). The wider designation for the Wainuiomata – Orongorongo Water Collection and Conservation Area has now been transferred to Tiaki Wai, so Greater Wellington is no longer the requiring authority. In addition, the purpose of WRC-14 differs from WRC-08. The purpose of WRC-08 is the "Operation, maintenance and improvement of a water collection and conservation area, and treatment plant"[13], while the new Greater Wellington designation will provide for recreation and general park management.

Alternative sites, routes or methods and whether the designation is reasonably necessary

48 Section 171(1)(b) of the Resource Management Act 1991 (RMA) includes the requirement for a territorial authority to consider the effects on the environment of allowing a notice of requirement, having particular regard to whether adequate consideration has been given to any alternative sites, routes, or methods of undertaking the work and whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought. However, this test only applies if the requiring authority does not have an interest in the land sufficient for undertaking the work.

49 In the case of Belmont, East Harbour and Wainuiomata Regional Parks, Greater Wellington is a landowner of some of the areas to be covered by the designations. The remainder of the land is owned by HCC and DOC. Greater Wellington administers all of the land in these parks under arrangements under the Reserves Act and the Local Government Act.[14] I consider that Greater Wellington as the requiring authority, does have an interest in the land sufficient for undertaking the work. This is because it does not need to obtain any further ownership or other rights or permissions to undertake the work.

50 As such, the tests related to consideration of alternative sites, routes or methods and whether the work and designation is reasonably necessary do not apply. I have also considered whether necessity could be considered as an 'other matter' under section 171(1)(d). However, the Act makes it clear the circumstances when necessity is relevant are when the requiring authority does not have sufficient

[13] Proposed Lower Hutt District Plan
[14] Toitū te Whenua (p. 103, 122, 179)

interest in the land. I also note that the tests in section 171(1)(b) are designed to mirror and complement the tests for compulsory acquisition in the Public Works Act 1981 (section 23(3)). There is no need for, or prospect of, compulsory acquisition here.

Balance of positive environmental effects

51 The s42a report states that the positive effects enabled by the NOR compared to what would otherwise be provided under the proposed district plan are unclear (para 415).

52 The relevant section of the RMA is s171(1B), which states that when a territorial authority considers the environmental effects of a notice of requirement, they may include any positive effects on the environment, as long as those effects will result from measures by the requiring authority.

53 The positive effects of designating the public works are outlined in each of the three parks NOR. These include connecting people to nature, providing a 'green' aspect to the urban backdrop and positive benefits to human health through access to green spaces. Most importantly, these works will protect and maintain open space with recreation, conservation, heritage, cultural and landscape values. As described in the NOR, maintaining and developing park assets such as tracks, roads, buildings and structures are integral to continued public access to these values and constitute appropriate use and development within the regional park setting.

54 Greater Wellington is committed to the protection, preservation, restoration, enhancement and conservation of significant natural, cultural and historic heritage sites located within the parks. These values constitute the fundamental reasons as to why these areas have reserve status and are managed as parks. Designations will protect these parks from inappropriate use and development.

55 As stated in the NOR, "GW considers that the benefits and positive effects of the public work designation and activities included in this NOR far outweigh any potential adverse effects on the environment that will or may result from the activity enabled by the designation."[15]

[15] NOR for Belmont Regional Park (p. 27), NOR for East Harbour Regional Park (p. 28), NOR for Wainuiomata Regional Park (p. 25)

Submissions and further submissions

Submitter	Submission Number	Designation	Relief Sought	Greater Wellington Response
003 – Rohan Kulkarni	3.13	WRC-13 (East Harbour Regional Park)	Seeks that WRC-13 (East Harbour Regional Park) is not applied to surplus HCC reserve-owned at 52N Stanley Street, Wainuiomata.	GW would be willing to remove the designation boundary from this parcel boundary.
444 – Winstone Aggregates	444.97, 444.107	WRC-12 (Belmont Regional Park)	Seeks that the WRC-12 (Belmont Regional Park) designation is removed from a proposed future overburden area adjacent to the existing quarry.	I understand that the Winstone Fast Track Approvals Act (**FTAA**) substantive decision is unlikely to be made until after the District Plan process. Winstone and GWRC have an agreement that should their FTAA be granted, GW will apply to HCC to amend our designation boundary to exclude this parcel.
474 – Clarus	474.74, 474.75a. 474.75b, 474.75d	WRC-12 (Belmont Regional Park)	Seeks that the WRC-12 (Belmont Regional Park) designation is removed from the Gas Transmission Pipeline Corridor. As alternative relief, Clarus seeks that the activities enabled by the designation are more closely defined, and that conditions are included which require the requiring authority recognise the needs for regionally significant infrastructure and to consult with Clarus and to control earthworks and buildings within the Gas Transmission Pipeline Corridor.	GW would be willing to exclude any ground penetrating activities in the Gas Transmission Protection Corridor from the designation. GW is open to working with Clarus to agree to appropriate conditions.

Submitter	Submission Number	Designation	Relief Sought	Greater Wellington Response
504 - Transpower New Zealand Limited	504.104	WRC-12 (Belmont Regional Park)	Seeks clarification as to how the NOR will give effect to the NPSET, and specifically how the National Grid Yard and National Grid Subdivision Corridor will be applied. One option may be to include a condition to the designation requiring compliance with the National Grid corridor provisions. The references could be updated upon subsequent plan reviews.	I agree with the reporting officer that works in designated areas must still give effect to National Environmental Standards under s9(1) of the RMA, so the NES for Electricity Network Activities will apply.

Appendix 1: Existing Greater Wellington Parks Designations

Information provided by Claire McKevitt, Greater Wellington, Team Leader Consents Management Delivery

Kaitoke Regional Park

1 This designation covers nearly 3,000 ha. Large areas of this park are within a Slope Hazard overlay (where this has been mapped by Upper Hutt City Council (**UHCC**)). She is not aware of Greater Wellington's Operations within this Slope overlay causing any issues that the overlay is trying to protect against. If anything, further protection of the park through a designation prevents undesirable development on a high slope area. The fact that the park has been operating with a designation and that the majority of the native vegetation remains intact, speaks to how Greater Wellington manages and uses the land under the designation.

2 UHCC has a high trust model and has confirmed that Greater Wellington does not require an outline plan of works, or waiver, for activities listed below as they are part of using the designation for its purpose.

3 Activities for which Greater Wellington does not require an outline plan of works from UHCC:

3.1 Track and road maintenance – with hand tools (cutting/scrub bar) or machinery (excavator, mower/hedge cutting),

3.2 earthworks (clearing slips or re-routing existing tracks, sometimes with cut batters >1.5m),

3.3 re-forming and re-surfacing, clearing/forming water tables, replacing culverts etc.

3.4 Spraying agrichemicals - hand spraying, mobile spraying from back of ute and helicopter/aerial

3.5 Structures - box drains, box steps, stairs, retaining walls, boardwalks, culverts, bridges, fences, gates, signs

3.6 Vegetation – planting, trimming, full removal, windfall/storm damage – exotic/weed species and indigenous species only when required for asset maintenance

3.7 Buildings and utilities maintenance – trenching, pipeworks, septic, upgrades

3.8 Pest management (plants & animals)

3.9 Summer events (covid alert levels allowing)

3.10 Campgrounds at Battle Hill, Belmont (Dry Creek) & Kaitoke, and wilderness camping throughout Akatarawa and Pakuratahi Forest Parks

3.11 Access and traffic management related to the above activities

Battle Hill Regional Park

4 Battle Hill Regional Park is designated in the Porirua District Plan 2025 under GWRC-03. This is approximately 500 ha. In the notice of requirement for alteration of a designation for Battle Hill Regional Park, the nature of the work is described as follows:

The designation is intended to define and protect Battle Hill Regional Park for the multiple uses described and controlled by the park management plan. The designation should be described as 'Battle Hill Regional Park' and should be defined as:

"Land developed and managed by the Wellington Regional Council for public access to the educational and recreational opportunities and experiences of a regional park encompassing farm animals. Development of the land includes forestry on appropriate parts of the property. All activities in accordance with the Regional Parks Network Plan 2010 adopted by the Wellington Regional Council".

"Proposed water collection for water supply purposes. At present the area is currently used for forestry and recreation purposes"[16]

5 The effects that the public work will have on the environment, and the ways in which any adverse effects will be mitigated are:

"This designation has been on the park for some time. Adverse effects on the environment are limited to activities associated with farming, forestry and the Transmission Gully motorway.

[16] Porirua District Council. Information for rolling over existing designations. Accessed online 19 November 2026. https://storage.googleapis.com/pcc-wagtail-media/documents/Rollover_information_and_correspondence_for_existing_designations.pdf

To minimise the adverse effects, Wellington Regional Council is guided by the Regional Parks Network Plan 2010. In mitigating any adverse effects Wellington Regional Council will be guided by:

5.1 The conditions of any resource consent needed

5.2 Relevant policies and rules of any Regional Plan or Regional Policy Statement

5.3 General principles of the Resource Management Act 1991 and Reserves Act 1977

5.4 National Environmental Statements

Beneficial effects on the environment accrue from policies in the park management plan which seek to preserve Battle Hill's historic sites, and to conserve and manage the natural environment."[17]

6 A designation was considered reasonably necessary because:

"Designation is considered the most appropriate means to support ongoing development of the park values and facilities as outlined in the management plan for the park. If land ownership changes, a designation (controlled by Greater Wellington Regional Council) will ensure that the land is maintained for public open space and potential water supply purposes. Other District Plan controls would provide lesser certainty that the land will maintained."[18]

7 Within the Battle Hill Regional Park there are various overlays, including two heritage overlays. These are preserved in the park, and the entire park is an Area of Significance to Māori. The protection of this site to Māori is being preserved and restored through the Parks Management Plan *Toitu Te Whenua*.

8 The Battle Hill Regional Park Designation works by day-to-day activities occurring; however, if Greater Wellington undertakes a more significant project, an outline plan of works or waiver is sought from Porirua City Council (**PCC**). Over the last 5 years, no outline plan of works has been required by PCC, but waivers have been provided for:

[17] Porirua District Council. Information for rolling over existing designations. Accessed online 19 November 2026. https://storage.googleapis.com/pcc-wagtail-media/documents/Rollover_information_and_correspondence_for_existing_designations.pdf
[18] Ibid.

8.1 Construction of a nature playground

8.2 earthworks associated with the creation of the playground, sensory garden, trail, and wastewater treatment and disposal replacement

8.3 removal of up to 3ha of pinetrees.

Queen Elizabeth Park

9 The Queen Elizabeth Park Designation WRC-001 is also large at 592 ha. The designation is covered by many overlays in the Operative Kapiti Coast District Plan 2021, including key native indigenous trees, areas of high natural character, outstanding natural features and landscapes, ecological sites, and an area of Statutory Acknowledgement to Ngāti Toa Rangatira. It has numerous historic heritage places, waahi tapu, and flood hazard overlays.

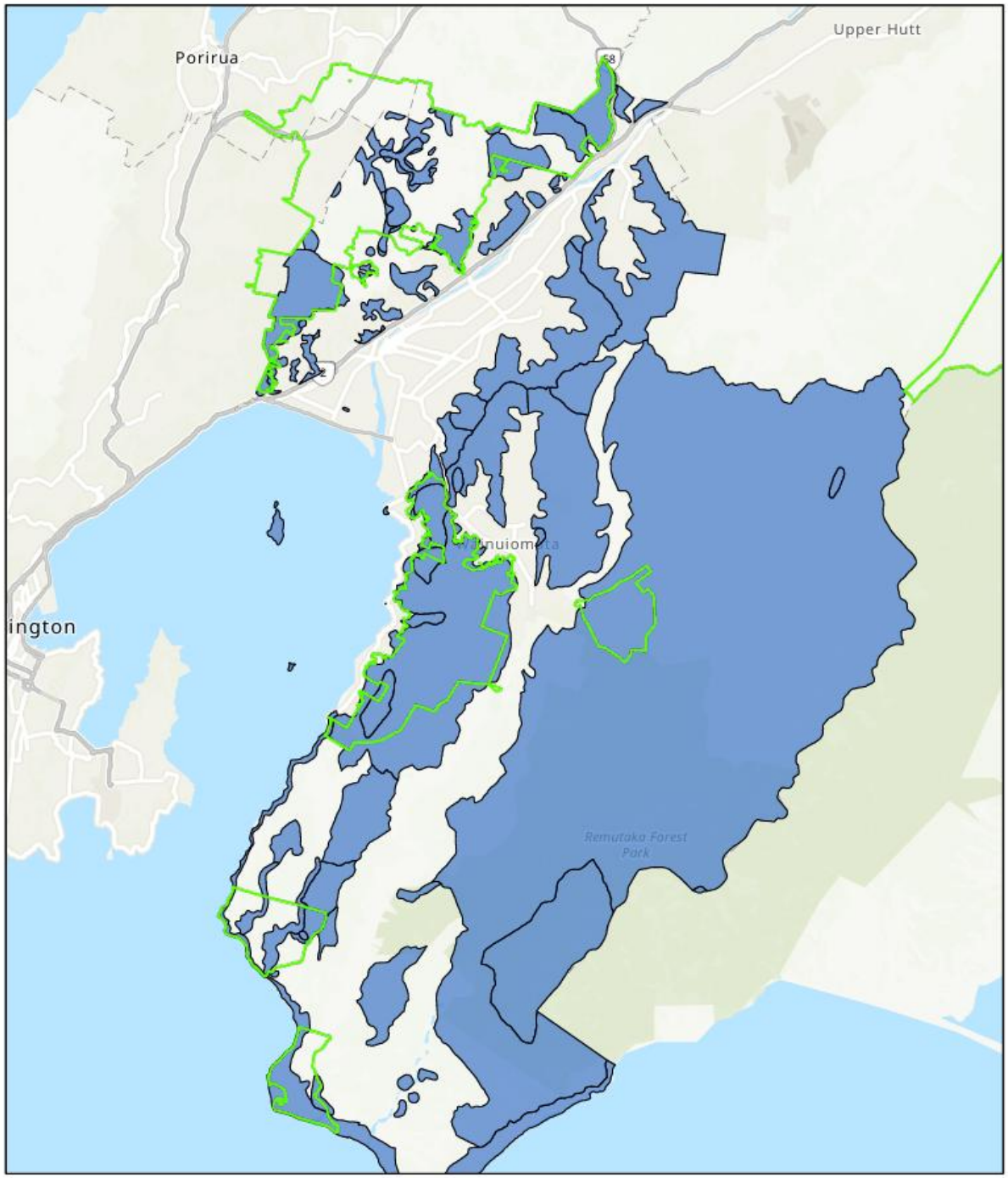
10 The QEP Designation purpose is:

"Queen Elizabeth Park. Regional Park and recreation reserve for the purpose of active and passive recreation including a golf course, conservation, production farming, facilities and buildings, associated with recreational, and operational activities of the Park."[19]

The designation has no conditions associated with it.

[19] Kapiti Coast District Plan.

Appendix 2: Map of Regional Parks with SNR Overlay



23/11/2026

Regional Parks Boundaries

ODP SNR Overlay

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Appendix 3: Auckland Unitary Plan Example of Regional Park Designation Conditions[20]

400 Tawharanui Regional Park

Designation Number	400
Requiring Authority	Auckland Council
Location	1181 Takatu Road, Takatu Peninsula, Tawharanui
Rollover Designation	Yes
Legacy Reference	Designation 201, Auckland Council District Plan (Rodney Section) 2011
Lapse Date	Given effect to (i.e. no lapse date)

Purpose

Regional park - for recreational use (including the ongoing operation and maintenance of trails and visitor infrastructure for informal outdoor recreation activities) and for the conservation of natural and cultural values.

Conditions

General

1. Any works are to be undertaken in accordance with either the approved Regional Parks Management Plan (2010) or any subsequent management plan.

2. Before any works, including new buildings, are undertaken an Outline Plan(s) shall be submitted in terms of Section 176A of the Resource Management Act 1991 to the Council unless the works are exempt, under Condition 3, from requiring an outline plan of works. The Outline Plan(s) of Works shall show those matters required by Section 176A of the Act and those matters specified in the following conditions (where relevant). All work shall be undertaken in accordance with the Outline Plan(s).

3. The following works will be exempt from an outline plan of works, except where the works involve a scheduled heritage place, pursuant to section 176A (2) of the Resource Management Act 1991:

Development and maintenance of park infrastructure		**Nature of works**
Tracks	Construction and maintenance of tracks and trails in a manner that prevents erosion and/or avoids sensitive natural and cultural features and sites	Construction and maintenance of tracks and trails up to 3.0m in width, including the construction of track structures, such as directional signs, information signs, safety barriers, foot-bridges, steps, board walks and rafts, and the maintenance of existing tracks involving: i. Water Tables and track drainage ii. Track surfaces iii. Track structures iv. Modification of vegetation up to 1m from the edge of the track
Buildings, structures and utility services,	Construction and maintenance of minor recreational structures and	The construction of utility services and minor recreational structures, such as notice boards, information kiosks, signs, picnic tables, styles,

[20] Auckland Council.pdf

including drainage systems	utility services	entrance gates and shade shelters and toilet blocks up to 100m^2 in area.
	Maintenance, repairs and minor alterations to buildings, structures and utility services	
Car parking and roads	Construction and maintenance identified in an approved management plan and minor alterations to existing car parks and roads	Works associated with approved car parking areas and access roads, including the modification of vegetation up to 1m from the edge of the car park or road, or within the car park for safety reasons
Farming, including farm woodlots	Construction and maintenance of farmingstructures and roads	Works associated with operating and maintaining existing farm operations, including management livestock fencing and the fencing of conservation and cultural heritage sites, and livestock management fences and structures, such as stockyards
Vegetation	Management of vegetation for specified reasons	Vegetation management involved in: i. Removal of non-native and non-scheduled plants ii. The development of approved works iii. The maintenance of view shafts identified in the Regional Parks Management Plan iv. Management of farm woodlots, including their harvest

Note:
This condition does not prevent the use of the land for the purpose of Regional Park.

Cultural / Heritage / Archaeological
4. Where any works or development involve the demolition of, or alterations or additions to a scheduled historic heritage place (item) an outline plan of works is required. The following shall be submitted with the outline plan of works:
a. An assessment of the effects on the historic heritage values of the place; and
b. A consideration of alternative methods and/or appropriate mitigation to prevent or avoid damage, loss or destruction of the values of the historic heritage place

Note:
For the avoidance of doubt, this condition does not prevent the use of the land for park purposes, but is to conserve and protect the recognised natural and cultural values that significantly contribute to the park.

Exemptions:
Condition 4 will not apply in the following circumstances:
i. In respect of buildings or structures, the redecoration, repair and/or insignificant alteration of any existing fabric or detailing carried out in a manner and design and with materials similar in appearance to those originally used, which does not detract from those features for which the place has been scheduled;
ii. Any routine maintenance which does not destroy, compromise, damage or impair the heritage values of the scheduled place; or
iii. Where there is a conservation plan or similar plan that has been prepared for the management of the scheduled historic heritage place and the proposed new works are in accordance with this conservation plan. The conservation plan or similar plan may be prepared as a document supplementing the approved Regional Parks Management Plan, prepared in terms of section 83 of

the Local Government Act 2002, but must include an assessment of the historic heritage values of the place, relevant management policies and objectives, and a specific management plan and a monitoring regime.

Transport
4. An Integrated Transport Assessment shall be prepared and accompany any Outline Plan of Works which results in:
a. Predicted vehicle movements to and from the park exceeding 100 vehicle movements per hour (excluding events).

The Integrated Transport Assessment (ITA) report shall be produced by a suitably qualified traffic engineer and/or transportation planner to the satisfaction of Auckland Transport, Manager of Road Corridor Operations. The ITA shall give particular consideration to the following matters:
i. The effects on the surrounding public road network arising from parking usage, access, loading, traffic generation in the park, including addressing any real or potential road safety implications;
ii. Pedestrian accessibility to the site and the need for any infrastructure to ensure safe crossing points are provided for including provision for cyclists and horse riding if appropriate);
iii. Where passing bays are proposed on any road which is only wide enough for one way traffic; and
iv. Public transport accessibility, including tourist buses and campervan, particularly onsite manoeuvring.

Parking and Access
5. The following works related to new roading and/or additional parking shall be constructed to the satisfaction of council:
i. The first 20m of access from any sealed public road shall be appropriately sealed with all-weather dust free surface; and
ii. Parking and loading areas immediately adjoining a public road shall be designed and constructed in accordance with AS/NZS 2890.1:2004 standards or any subsequent revisions.

Advice Notes
1. The Requiring Authority and operational staff are encouraged to seek advice from council's Heritage Unit prior to undertaking the exemptions to Condition 4 in order to confirm an outline plan is not required.

2. Work affecting both recorded and unrecorded pre-1900 archaeological sites (including surface and sub-subsurface marine and terrestrial deposits, building or structures) is subject to an authority under the Historic Places Act 1993. Any activity that may modify, damage or destroy an archaeological site requires an authority from the New Zealand Historic Places Trust (NZHPT) in order for the work to proceed lawfully. If an unrecorded archaeological site is discovered while undertaking work, work must cease and the NZHPT advised of the discovery. The NZHPT will inform the designating authority of the protocol, which may require obtaining a retrospective authority to modify. In addition to advising the NZHPT, Council's Heritage Unit shall be advised of the discovery.

3. Examples of evidence of archaeological sites include (but are not limited to) burnt and fire cracked stone, charcoal, rubbish heaps including shell, bone and/or glass and crockery, ditches, banks, pits, old building foundations, artefacts of Māori and European origin or human burials.

4. The Regional Park Management Plan is prepared in accordance with Section 83 of the Local Government Act 2002 and, where appropriate, Section 41 of the Reserves Act 1977. Public consultation is required at the time of preparing or amending a management plan or development plan for a Regional Park.

Attachments

No attachments.