

Hearing Report
Proposed four-year grazing licence for Belmont
Regional Park

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Hearing Date: 5 and 7 October 2026

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Purpose

1. To present to the Hearing Panel the objections and submissions received in response to the public notification to grant a licence to graze at Belmont Regional Park under section 74(2) of the Reserves Act 1977.

Summary of Recommendations

2. It is our view that the licence can be granted. We have recommended some amendments to the proposed licence conditions to improve clarity and certainty and address concerns raised by submitters. We have also requested further information from the Applicant.
3. We recommend that the Hearing Panel:
 - a) Receive this report and written submissions summarised in this report
 - b) Receive the full objections and submissions contained in Appendix 5: Objections and submissions on proposed grazing licence
 - c) Provide your recommendations on the proposed grazing licence to the Administering Body.

Report Body

1.0 Context

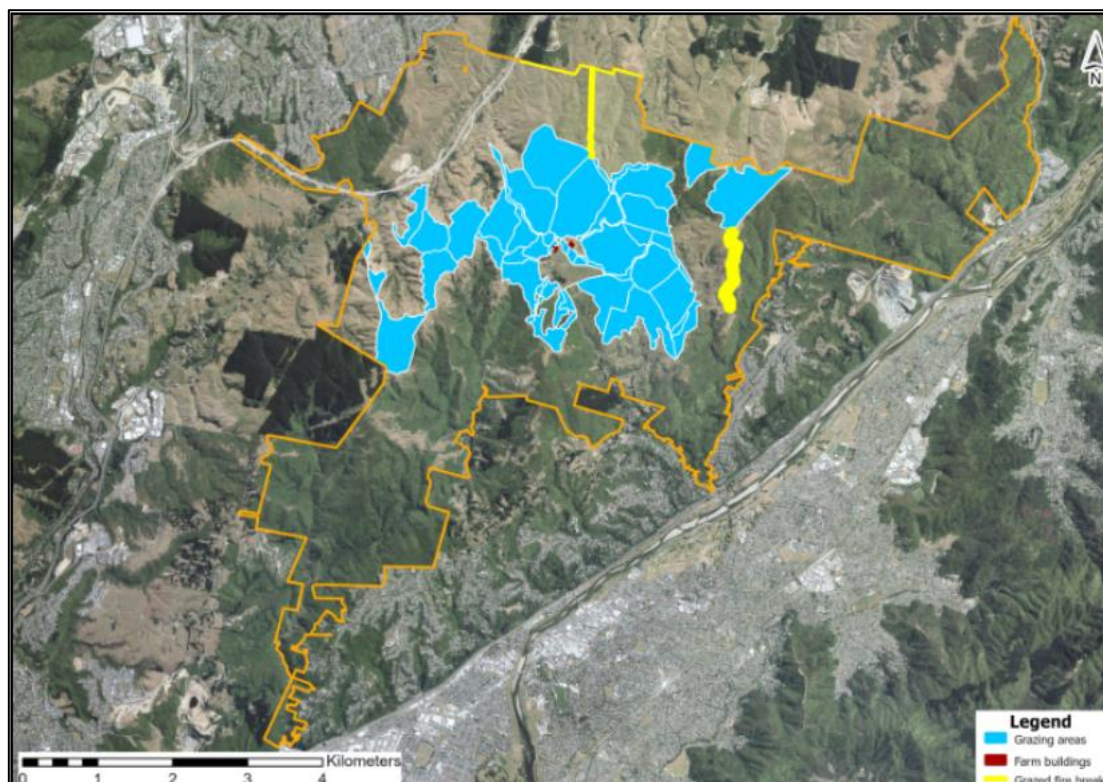
1.1 Purpose

4. The purpose of this report is to provide the Hearings Panel with an analysis of objections and submissions received by Wellington Regional Council (**the Council**) in relation to the proposed four-year grazing licence (**the proposed grazing licence**) at Belmont Regional Park (**BRP**).
5. Based on this analysis we provide the Hearing Panel with our recommendation on whether to grant or decline the proposed grazing licence under section 74(2) of the Reserves Act 1977 (**the Reserves Act**) subject to any recommended amendments.

1.2 Belmont Regional Park

6. BRP is one of eight regional parks managed by the Council. BRP (3292 ha) occupies many of the steep hills and valleys between Porirua and Hutt Valley. It sits within the takiwā of Taranaki Whānui and Ngāti Toa and is administered by the Council.

Figure 1: Belmont Regional Park boundary line and proposed grazing area



7. The park is comprised of remnant, regenerating and replanted indigenous vegetation and wetlands, some exotic plantings, previously grazed pastoral land, and has sites of cultural and historical importance scattered throughout. Critically, BRP is an important community asset for recreational activities.

8. The last grazing licence expired in January 2026. The park has not been grazed since then.

1.3 The proposed grazing licence

9. On 16 June 2026, the Parks department of the Council (**the Applicant**) applied to the Council for a licence to graze approximately 735 hectares within BRP for a term of four years.
10. The Council as the Administering Body under the Reserves Act is also decision-maker for the proposed grazing licence. In this case, the hearing process has been managed by the Strategy, Policy, and Regulation department of the Council.
11. The Applicant would be the licence holder, and may grant a sub-license to a grazier.

1.4 Authors

12. This report has been jointly prepared by Mika Zöllner and Josephine Knight-Maclean. Throughout the report we refer to 'we' which represents our shared view.

Mika Zöllner

13. My full name is Mika Helena Zöllner. I am employed by the Council as a Senior Policy Advisor in the Environmental Policy team. I hold a Bachelor of Environments from the University of Melbourne and a Master of Environmental Science from Victoria University of Wellington Te Herenga Waka.
14. I have 5 years' experience in resource management planning preceded by 2 years' experience in water science. During this time, I have undertaken a mixture of policy and planning work, including plan changes, policy implementation, and engagement on district plans and central government legislation.
15. I have not previously worked on any matters related to BRP. I became involved in the proposed grazing licence application process after public notification.
16. I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court December 2023. While the Code does not apply to this particular decision, I have complied with it when preparing this report and I will comply with it when I give any oral evidence.
17. Any data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.
18. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Josephine Knight-Maclean

19. My name is Josephine Dorothea Mary Knight-Maclean and I am employed by the Council as a Policy Advisor in the Environmental Policy team. I hold a Bachelor of Resource and Environmental Planning (First Class Honours) from Massey University. I am an intermediate member of the New Zealand Planning Institute.

20. I have three years of experience in resource management and planning working in local government. During this time, I have worked in policy planning across a range of resource management issues.
21. I have not previously worked on any matters related to BRP. I became involved in the proposed grazing licence application process after public notification.
22. I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court December 2023. While the Code does not apply to this particular decision, I have complied with it when preparing this report and I will comply with it when I give any oral evidence.
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24. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

1.5 Report Structure

25. This report sets out the statutory context for granting a grazing licence in BRP in Section 2.0, describes the licence process in Section 3.0, and provides an overview of submissions and objections received in Section 4.0.
26. The issues raised in objections and submissions are addressed by sub-issues in Section 5.0. Some submissions cross several sub-issues and are therefore addressed under more than one sub-issue heading. A planning assessment against the Reserves Act and the applicable reserves management plan is undertaken in Section 6.0. Based on this analysis we have provided our recommendations to the Hearing Panel in Section 7.0.
27. The appendices to this report are:
 - Appendix 1 sets out the proposed draft licence terms and conditions as provided by the Applicant.
 - Appendix 2 sets out the amendments we are recommending to the proposed draft licence terms and conditions as a result of our analysis of submissions.
 - Appendix 3 sets out the submissions points that we consider are out-of-scope of the proposed grazing licence and provides our assessment of this.
 - Appendix 4 sets out the Applicant's response to our request for information (separate document).
 - Appendix 5 sets out all objections and submissions received on the proposed grazing licence in full, redacted to comply with the privacy requirements (separate document).

- Appendix 6 includes a map of the proposed grazing licence area with the block labels included (separate document).

1.6 Background information

28. There are three key committee documents which form the background to the proposed grazing licence. These are referred to throughout this report and available on the Council website. They will be referred to as follows:

- **June 2025 report¹**: Refers to 19 June 2025 Environment Committee Report 25.140 – Belmont Regional Park Long Term Restoration Strategy:
 - i. Attachment 1 – Structured decision making options summary, which provides detail on how options for the restoration strategy were identified, analysed and compared.
 - ii. Attachment 2 – Technical restoration strategy description, which describes the proposed methods for planting and natural regeneration.
- **February 2026 report²**: Refers to 26 February 2026 Environment and Climate Change Committee Report 26.7 – Belmont Regional Park Restoration Implementation and Grazing Requirements to 2030
- **March 2026 workshop paper³**: Refers to 26 March 2026 Environment and Climate Committee workshop paper and presentation – Belmont Regional Park Toitū Te Whenua Parks Network Plan 2020-2030 implementation.

2.0 Statutory Context

2.1 Reserves Act 1977

29. The land in question is a recreation reserve under the Reserves Act 1977 (Reserves Act). Wellington Regional Council is the administering body for this reserve under the Act. The purpose of a recreational reserve, and the core requirements for administering them, are set out in s.17 of the Act being:

(1)...providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside.

¹ <https://www.gw.govt.nz/assets/Documents/2025/06/Environment-Committee-19-June-2025-condensed.pdf>

² <https://www.gw.govt.nz/assets/Documents/Documents/2026/02/Environment-and-Climate-Committee-26-February-2026-Order-Paper.pdf>

³ <https://www.gw.govt.nz/assets/Documents/Documents/2026/07/Environment-and-Climate-Committee-Public-Workshop-Material-26-March-2026.pdf>

(2) It is hereby further declared that, having regard to the general purposes specified in subsection (1), every recreation reserve shall be so administered under the appropriate provisions of this Act that—

(a) the public shall have freedom of entry and access to the reserve, subject to the specific powers conferred on the administering body by sections 53 and 54, to any bylaws under this Act applying to the reserve, and to such conditions and restrictions as the administering body considers to be necessary for the protection and general well-being of the reserve and for the protection and control of the public using it:

(b) where scenic, historic, archaeological, biological, geological, or other scientific features or indigenous flora or fauna or wildlife are present on the reserve, those features or that flora or fauna or wildlife shall be managed and protected to the extent compatible with the principal or primary purpose of the reserve:

provided that nothing in this subsection shall authorise the doing of anything with respect to fauna that would contravene any provision of the Wildlife Act 1953 or any regulations or Proclamation or notification under that Act, or the doing of anything with respect to archaeological features in any reserve that would contravene any provision of the Heritage New Zealand Pouhere Taonga Act 2014:

(c) those qualities of the reserve which contribute to the pleasantness, harmony, and cohesion of the natural environment and to the better use and enjoyment of the reserve shall be conserved:

(d) to the extent compatible with the principal or primary purpose of the reserve, its value as a soil, water, and forest conservation area shall be maintained.

30. Section 74(2) of the Act provides for the granting of a grazing licence in a recreation reserve where:

... In the opinion of ... the administering body, it is necessary or desirable for the management of the reserve for the purpose for which it is classified.

2.2 Toitū Te Whenua Parks Network Plan 2020-2030

31. In addition to the tests in the Reserves Act, the Council must ‘comply with’ the management plan for the reserve in making this decision (refer section 41(11) of the Reserves Act). Toitū Te Whenua Parks Network Plan 2020-2030 (**Toitū Te Whenua**) is the operative management plan for the Council’s parks and forms the primary policy framework for assessing the proposed grazing licence.

32. Toitū Te Whenua:

- identifies core values for the management of the Council’s reserves,
- defines appropriate activities in the rules for use and development section, and

- sets processes to help ensure protection and enhancement of the core values such as the requirement for an Assessment of Environmental Effects (**AEE**).
33. There are 16 policies in Toitū Te Whenua that apply to the proposed grazing licence. The proposed grazing licence is assessed against these in section 5.7 of this report. Key policies of particular relevance to an application for a stock grazing licence are:
- *Policy 17P – To phase out livestock grazing (except Battle Hill) unless it can be demonstrated that there are significant nett recreation, conservation or community benefits, with full public access maintained. Manage grazing licence activity practices to:*
 - a. *Protect soil, water and remnant native vegetation through AEE process. Also refer 13P, 20P*
 - b. *Ensure full public access in grazing licence areas. Refer Rules.*
 - *19P - To prohibit agricultural grazing related operational activities deemed (through annual grazing licence plan AEE assessment) to be high impact or in sensitive sites*
 - *20P - To avoid and reduce farming infrastructure investment (except Battle Hill) unless there are direct benefits for conservation, recreation or community activities:*
 - *Avoid any additional investment in stock fences, shelter, or stock water facilities and services*
 - *Progressively remove fences not required for recreation or conservation purposes*
 - *Minimise impacts during phasing out of grazing licences (Also refer 17P)*
 - *Adaptively reuse and recycle farming related infrastructure for conservation, recreation and community purposes*

2.3 Resource Management Act 1991

34. The Council's Natural Resources Plan (**NRP**) is the relevant Resource Management Act 1991 (**RMA**) planning document that manages livestock activities as they relate to the effects on water.
35. The Applicant considers that the proposed activity meets the permitted activity conditions of Rule R98 of the NRP. The rule assessment is set out on Page 17 of the AEE. This is independent to the status of grazing as a restricted activity under Toitū Te Whenua.

3.0 Licence Process

3.1 Public consultation

36. Under section 74(3) of the Reserves Act, the Administering Body is required to publicly notify any proposal for a licence to occupy a recreation reserve for the purposes of grazing.
37. On 16 June 2026 the proposed four-year grazing licence at BRP was notified. A correction notice was notified 15 July 2026 to correct the map showing the areas for the proposed licence.
38. To account for the error, submitters were allowed two calendar months in which to make their submissions or objections (and to advise whether they wished to have their objections or submissions heard). The submission period ended at 11:59 pm on 15 August 2026.
39. One pre-approved late submission was received on 20 August 2026.

3.2 Hearing process

40. On 3 September, the Group Manager Environment nominated an independent commissioner as the Hearing Panel to hear submissions and objections received following the public notification of the proposal to grant a licence to graze at BRP.
41. The Hearing Panel will conduct the hearing of submissions and prepare a recommendation report on the proposed grazing licence. This will be presented to the Group Manager Environment to make the final decision on the proposed grazing licence.
42. The hearing has been scheduled for 5 and 7 October. The hearing process is set out on the Council's website⁴.
43. Following the hearing, the Hearing Panel will give full consideration to the written and verbal submissions and make their recommendation in a report to the Group Manager Environment.

4.0 Summary of objections and submissions

4.1 Objections and submissions overview

44. Following publication of the public notice, the Council received 20 objections and submissions by the deadline of 15 August 2026, and 1 objection with an approved extension on 20 August 2026.
45. The Council received twelve objections, seven submissions in support, and two which did not provide a clear position. Two submitters clarified their position via email; this correspondence is included in Appendix 5.
46. The objectors and submitters and their overall position are summarised below:

⁴ [Greater Wellington — Proposed temporary grazing licence](#)

- Cora McCauley, Paul Nation, Grenville Gaskell and Trish Heath, Peter Law, Preserve Belmont Farm Park (Preserve Belmont Farm), and Hikoikoi Management Ltd⁵ generally support the grazing licence application as proposed.
- Friends of Maara Roa (FoMR), Forest and Bird, Friends of Belmont Regional Park (FoBRP), Pat Van Berkel, Pene Burton Bell, Russell Bell, Pareraho Forest Trust, Maria Whitehead, Ngā Kaitākore ki Pito One, Robyn Smith, Stephanie Gregor and Merrin Pearse oppose the grazing licence application as proposed and generally seek more restoration.
- Marlene Bowles opposes the grazing licence application as proposed and seeks that more land is grazed. Paul Robinson did not provide a specific position on the proposed grazing licence but supports retention of grazing on all available grass.
- Tamsin Falconer did not provide a position on the proposed grazing licence, but seeks that the Council considers a recent report on the health of Korokoro Stream and catchment in determining the licence conditions.

47. The Reserves Act does not require that a separate summary of submissions is produced. To support full consideration and analysis of objections and submissions, we have grouped the issues raised as follows:

- Concerns with the process
- Consistency with the Long-Term Belmont Restoration Strategy and other strategic documents
- The retirement and restoration of licenced land
- Environmental impacts of stock grazing
- Grazing logistics and responsibilities
- Grazing and recreation under the Reserves Act 1977
- Compliance with Toitū Te Whenua Parks Network Plan 2020-2030

4.2 What can be changed about the licence?

48. For clarity around what is in and out of scope for this process, we have identified the ‘options’ available to the Council as the decision maker with regards to the proposed grazing licence. These options are:

- Do not grant the licence, or
- Grant the licence, but:
 - i. Decrease the Licenced Area
 - ii. Alter the licence term

⁵ Hikoikoi Management Ltd represents the views of Taranaki Whānui ki Te Upoko o Te Ika (Port Nicholson Block Settlement) Trust, the Wellington Tenth Trust and the Palmerston North Māori Reserve Trust.

- iii. Modify the conditions that apply to the Licenced Area, key features of which are:
 - a. Stock density and type
 - b. Setbacks from waterbodies and exclusions from environmentally sensitive areas (including how they are classified)
 - c. What is permitted in the Licenced Area (including fertiliser use, weed control and farming infrastructure)
 - d. How breaches are managed
 - e. Mechanisms for amending the licence

4.3 Out-of-scope submissions

- 49. To be in scope, we therefore consider that content included in objections or submissions and their relief sought must relate to:
 - Whether the licence should or should not be granted, or
 - Something that can be managed through the licence, e.g. Extent of grazing, density of stock, or conditions.
- 50. Objections or submissions deemed to be out of scope, and the reason for this assessment, are listed in Appendix 3.
- 51. We consider that there are several issues and concerns raised by submitters which are not within scope of this process but can be considered, balanced and addressed through the BRP master planning process which is currently underway. This includes submissions which relate to the approximately 300 hectares of land which is already retired and therefore not within the proposed Licenced Area.
- 52. We consider that the issue of *how* retired land outside of the license area is managed, including related concerns around fire risk, gorse and weeds, is not able to be managed by a grazing licence. However, the issue of *whether* land should be grazed is able to be considered pursuant to the test in the Reserves Act and the additional requirements of Toitū Te Whenua. That said, not all of the reasons that have been put forward for retiring land are relevant matters. We have included these points in our summary and analysis.

4.4 Information requested from applicant in response to submissions

- 53. On 1 September we requested specific information from the applicant in relation to the proposed grazing licence for BRP, to assist us in giving full consideration to all submissions and objections received.
- 54. The Applicant's response to this request is set out in Appendix 4 to this report.

5.0 Analysis of objections and submissions

5.1 Process concerns

5.1.1 Summary of submissions

55. Pareraho Forest Trust submit that insufficient information has been shared to enable assessment of whether the proposed grazing licence is consistent with Toitū Te Whenua, and the adequacy and legality of licence conditions. Specifically, they sought information on:

- what defines environmentally sensitive areas,
- how stock numbers will be set,
- how the grazing practice will be reviewed and adjusted,
- what allowance will be made for ongoing mana whenua and community input into the AOP (and AEES), and
- how the licence will allow for the implementation of master planning outcomes.

56. Pareraho Forest Trust also submit that the process to develop the licence conditions to the exclusion of existing and long-term stakeholders is unjustifiable. The submitter requests that Officers circulate the draft licence document to stakeholders and take feedback.

57. Ngā Kaitārore ki Pito One also note the lack of licence terms and conditions to provide comment on in their submission.

58. Paul Nation requested further information on water for stock, management of cattle health, control of pests and weeds, and fire management. Responses to these questions were included in the Questions and Answers document on the Council website⁶. Submitters were notified of the addition of this information via email on 14 August 2026.

59. Grenville Gaskell and Trish Heath highlight that a master plan for BRP should ideally have been completed within the 3-year period as identified in Toitū Te Whenua, which would have assisted to agree on a shared approach to restoration. They highlight that Toitū Te Whenua does not provide detail on how its direction will be implemented, which has contributed to uncertainty and differing community views.

60. Forest and Bird, Pene Burton Bell, Russell Bell, and FoBRP submit that considerable engagement with mana whenua and the community occurred to develop Toitū Te Whenua, and that the shift in direction for the proposed grazing licence undermines this community engagement process.

5.1.2 Analysis of submissions

61. We acknowledge the concerns raised by submitters about the process for notifying the proposed grazing licence. The public notice included a brief summary of what the licence conditions would include, rather than the full proposed draft licence terms and conditions. Further detail about the Annual Operations Plan and the proposed licence was provided

⁶ [Belmont-Grazing-Licence-Questions-and-Answers-14-August-2026.pdf](#)

through the Questions and Answers posted on the Council website on 20 July 2026⁷. These were updated with some additional information in response to questions from submitters on 14 August 2026. The AEE was published on the Council website on 30 July 2026⁸.

62. We requested the proposed draft licence terms and conditions from the Applicant, and they were provided to us for consideration in this report. These are included in Appendix 1 of our report for submitters to view and respond to ahead of the hearing. We understand the Applicant intends to provide more information about effects management in their report, which submitters will also be able to respond to.
63. We also acknowledge submitters' concerns around the interaction between this proposed grazing licence and ongoing public engagement on the BRP master plan, as well as the considerable engagement that occurred to feed into Toitū Te Whenua. We are of the view that the BRP master plan is the most appropriate mechanism to collaboratively develop a strategic, spatial approach to implement Toitū Te Whenua and the future management of BRP.
64. In response to the further information sought by Pareraho Forest Trust, these matters are all discussed in Sections 5.3-5.6 of this report.

5.1.3 Conclusions

65. It is our view that no amendments to the proposed grazing licence are necessary in response to these submissions.

5.2 Consistency with Long Term Restoration Strategy and other strategic documents

5.2.1 Summary of submissions

66. Forest and Bird submit that the proposed grazing licence is inconsistent with the BRP Long Term Restoration Strategy, which they consider effectively balances multiple issues and is based on robust engagement, analysis and evidence. They refer to the Council's analysis finding the restoration strategy to be consistent with Toitū Te Whenua and several other strategic documents, and assert that the community has expressed a clear interest in restoration.
67. Forest and Bird and Russell Bell seek that the grazing licence is aligned with the BRP Long Term Restoration Strategy and its 10-year pathway for the reduction of grazing.
68. FoMR, Forest and Bird, and Pene Burton Bell consider the licence is inconsistent with Greater Wellington Regional Council's 2011 Biodiversity Strategy and Recloaking Papatūānuku project.
69. Ngā Kaitārore ki Pito One consider the licence is inconsistent with Te Whaitua and Mauri Tūhono, and particularly highlight the Te Whaitua te Whanganui-a-Tara Committee's note that "Mana Whenua expect the special values associated with Te Korokoro o Te Mana will be

⁷ [Belmont-Grazing-Licence-Questions-and-Answers-14-August-2026.pdf](#)

⁸ <https://www.gw.govt.nz/assets/Documents/Documents/2026/07/Assessment-of-Environmental-Effects-Belmont-Grazing-Licence-2026.pdf>

enhanced through recognition of the persona of the awa and restored through active management."

70. Pene Burton Bell and FoMR submit that the licence is inconsistent with the Council's agreed climate emissions targets. Pene Burton Bell considers that all possible action should be taken to minimise the impact of climate change including not allowing the grazing licence to be granted.
71. Russell Bell submits that the proposed grazing licence will have a negative effect on the Council's emission targets, and that the positive effects of the restoration done to date are irrelevant to consideration of the climate implications of the proposed grazing licence.
72. FoBRP also raise the need for the Council to address carbon impacts of grazing, while Hikoikoi note Action A200 of Toitū Te Whenua sets out that, "...*accelerating destocking of grazed areas of the park...*" is part of the Council meeting its climate emergency and carbon neutrality commitments.

5.2.2 Analysis of submissions

Statutory weighting to strategic documents

73. Under the Reserves Act the administering body is required to comply with the applicable reserve management plan. The Reserves Act itself does not require that any weight is given to other council documents, such as the Council's climate emission targets, Biodiversity Strategy, and Recloaking Papatūānuku.
74. However, Policy 5P of Toitū Te Whenua directs that the Council, "*demonstrate highly sustainable practices in land management following Greater Wellington... policies and rules including... Biodiversity Strategy and other relevant plans and strategies are complied with and exceeded wherever possible.*"
75. The Local Government Act 2002 also establishes overarching requirements that apply to the Council's decisions, unless they are inconsistent with more specific legislation. Section 78(1) of the LGA sets out:

... A local authority must, in the course of its decision-making process in relation to a matter, give consideration to the views and preferences of persons likely to be affected by, or to have an interest in, the matter...

76. We must therefore consider the proposed grazing licence's consistency with the strategic documents raised in the submissions, to the extent that they reflect the views and preferences of affected or interested persons

Belmont Regional Park Long Term Restoration Strategy

77. The BRP Long Term Restoration Strategy was approved by the Council's Environment Committee on 19 June 2025. It constitutes an outline of the strategic approach to restoration, including mana whenua and community involvement, an approach to planting, and the process for master planning. The strategy was supported by considerable collaborative investigation, prioritisation and technical discussion which is outlined in Attachment 1 to the June 2025 report. The strategy outlined that its preferred approach was

a staged restoration of approximately 100 hectares per year, including about 20 hectares of planting each year.

78. The strategy is not a statutory or formal strategy document; rather it is an agreed approach to restoration. Officers repeatedly recognise the need for flexibility, for example in paragraph 16 of the June 2025 report, the adaptive, agile approach of the strategy is emphasised, *“allowing a level of flexibility to enable work to adapt over time, depending on funding, issues arising and levels of success.”* We therefore do not consider the strategy to represent a fixed target to measure against; rather it is a strategic approach to how restoration will occur iteratively and collaboratively.
79. The February 2026 report provides a more detailed description of how the restoration strategy would be implemented up to 2030. The proposed approach was to prepare a 4-year grazing licence after retiring 300 hectares and then use the master planning process to inform future grazing retirement and restoration⁹. This report further explores the necessity of some ongoing grazing as a low impact land management tool to support a transition toward restoration. It also highlights the need for flexibility in the licence design as the master planning process progresses in parallel.
80. It is worth noting that the restoration strategy outlined in the June 2025 report makes it clear that retirement of 100 hectares per year would be a target, or average over the 10-year period of the strategy¹⁰. Given the need for flexibility, as outlined by the strategy, aligning with the BRP Long Term Restoration Strategy would not require the retirement of strictly 100 hectares per year as a fixed number.
81. However this being said, we acknowledge the concern raised by submitters that the proposed grazing licence does not guarantee any reduction in grazing extent, and instead proposes to use the Annual Operations Plan to revisit the extent of grazing annually. We recognise that if the Licenced Area has not reduced in extent by 2030, this would represent a shift away from what was indicated in the June 2025 report. However, even if this is the case, the strategy is not a fixed or statutory target, but rather is an agreed approach to restoration. We do not consider that the grazing licence must align with the BRP Long Term Restoration Strategy.
82. We address whether the licence should specify the progressive exclusion of grazing land, and to what extent, in Section 5.3.

Climate change targets and Recloaking Papatūānuku

83. When the Council declared a climate emergency in 2019, the organisation also committed to gradually phasing out grazing in its regional parks and undertaking significant restoration – a project called Recloaking Papatūānuku¹¹. The Organisational Climate Emergency Action Plan sets out what the Council will do to work toward carbon neutrality, and includes,

⁹ Paragraphs 33, 45 and 61 of the February 2026 report.

¹⁰ Paragraph 25 of the June 2025 report.

¹¹ <https://www.gw.govt.nz/your-region/plans-policies-and-bylaws/plans-and-reports/parks-plans/toitu-te-whenua-parks-network-plan-2020-30/implementing-toitu-te-whenua-parks-network-plan-2020-30/restoring-ecosystem-health/>

“Implement the Toitū Te Whenua Parks Network Plan 2020-30, progressively retiring grazing and restoring native ecosystems across parks.”¹²

84. Submitters have raised concerns that the proposed licence weakens the Council’s ability to achieve its carbon emissions targets. The March 2026 workshop paper notes that if no further retirement occurs, the Council will meet its 2030 organisational emissions target, likely its 2035 target, but not its 2040 target without additional emission reduction contributions from other parts of the organisation¹³.
85. While the climate change action plan and emissions targets are not statutory instruments, we acknowledge submitters’ concern. As noted above, section 78(1) of the Local Government Act requires the Council to, “*give consideration to the views and preferences of persons likely to be affected by, or to have an interest in, the matter*”. This includes the views and preferences expressed in the context of consultation on climate policies and plans. That being said, given that the organisation is still on track to meet its 2030 and 2035 targets through restoration done to date, we consider that there remains time for the BRP master plan to inform future restoration priorities and methods. Because the proposed grazing licence term is only up to 2030, flexibility is maintained beyond this date.
86. Recloaking Papatūānuku anticipates that some low-impact grazing may be necessary and desirable to maintain open areas and manage fire risk in regional parks – in particular Belmont¹⁴. We consider that the proposed licence is not inconsistent with the Recloaking Papatūānuku restoration guidance.
87. The key question remains whether the proposed grazing licence complies with the statutory Toitū Te Whenua direction, which the Council’s climate action plan refers to. We address this matter in Section 5.7.

Biodiversity Strategy 2011-2021

88. The 2011-2021 Biodiversity Strategy sets up a framework to guide the Council’s activities to protect and manage indigenous biodiversity. Policy 5P of Toitū Te Whenua seeks that land management practices comply with the Biodiversity Strategy so it is a relevant consideration for the Council’s responsibilities relating to indigenous biodiversity.
89. The strategy contains three goals:
- Goal One: Greater Wellington demonstrates leadership in biodiversity management
 - Goal Two: High value biodiversity areas are protected
 - Goal Three: Regional ecosystem functions are maintained and restored.

¹² [Organisational-Climate-Emergency-Action-Plan.pdf](#)

¹³ Paragraph 17-19 of the March 2026 workshop paper.

¹⁴ Recloaking Papatūānuku Restoration Guide [Recloaking-Papatuanuku-Technical-Restoration-Guide-Draft-V2-Edit-20230320.pdf](#)

90. A key principle of the biodiversity strategy is for the Council to lead by example in the way that it manages its own land and activities, by demonstrating protection and restoration of the region's biodiversity. This principle is particularly relevant to implementation of Toitū Te Whenua, as is other direction around cost effectiveness, working in partnership, and following best practice. The strategy identifies key actions for the Council to take to achieve its three goals, which includes (among many others), *“assess GW lands and programmes to identify actions that will maintain and improve biodiversity outcomes”* to achieve Goal One.
91. Submitters have not explained in detail why they consider the proposed grazing licence to be inconsistent with the Biodiversity Strategy. Without an in-depth analysis, we are of the view that the direction of Toitū Te Whenua is broadly consistent with the approach of the Biodiversity Strategy. We note that the sentiment of the strategy is that the Council has a responsibility to lead by example in how it manages its own land through partnership, while taking a practical and cost-effective approach. We consider that the commitment to undertake BRP master planning and implement its outcome, while using the proposed grazing licence as an interim land management tool, reflects a flexible and collaborative approach which is cognisant of what can be realistically achieved. In our view this approach is broadly consistent with the 2011-2021 Biodiversity Strategy.

Whaitua Implementation Programmes and Mauri Tūhono

92. The June 2025 report provides an analysis of the BRP Long Term Restoration Strategy against:
- Whaitua te Whanganui-a-Tara
 - Te Mahere Wai o Te Kāhui Taiao
 - Te Awarua-o-Porirua and Te Wai Ora a Parirua – Porirua Harbour Accord
 - Mauri Tūhono
93. We do not think the overall approach, which is to develop and implement a master plan in partnership with mana whenua and in collaboration with communities, while using the grazing licence as an interim land management tool, has materially changed since this analysis was undertaken. We consider that the Applicant will work to mitigate adverse effects on receiving environments and take a holistic and adaptive approach to grazing at BRP. We are satisfied that it is motivated to positively contribute to implementation of these documents. This matter is discussed further in Section 5.4.

5.2.3 Conclusions

94. It is our view that no amendments to the proposed grazing licence are necessary in response to these submissions. We address retirement of land in Section 5.3, environmental impacts of stock grazing in Section 5.4, and compliance with Toitū Te Whenua in Section 5.7.

5.3 Retirement and restoration of licenced land

5.3.1 Summary of submissions

Whether and when the licenced land is retired

95. Several other submitters seek that the grazing licence specifies progressive exclusion of land from the Licenced Area, while others do not support ongoing retirement at this stage. We have summarised the submissions, while noting that they are in scope only as they relate to the 735 hectares within the proposed Licenced Area.
96. Robyn Smith seeks that all grazed land is retired and restored.
97. Pat van Berkel, FoMR, Pene Burton Bell, Russell Bell and Pareraho Forest Trust seek that the licence specifies retirement and restoration of 100ha of grazing land per year.
98. Forest and Bird and FoBRP similarly seek that the licence is aligned with the pathway for reducing the extent of grazing in line with the BRP Long Term Restoration Strategy and the February 2026 report. Forest and Bird seek that the licence provides a clear plan for how livestock will be phased out, and that the licence conditions include the ability to retire land by mutual negotiation.
99. Stephanie Gregor and Pareraho Forest Trust refer to the progressive reductions in the licenced grazing area which were included in the licence Expression of Interest, and submit that this retirement schedule should be retained in the licence in line with Toitū Te Whenua.
100. Maria Whitehead seeks that the licence contains a clause which would allow the progressive retirement and restoration of the remaining grazed land.
101. Merrin Pearse seeks that most livestock grazing is phased out as soon as possible. The submitter states that the area is a significant proportion of the park.
102. Pat van Berkel highlights the park's positioning as an important ecological corridor, and raises concerns around the effects of the proposed grazing licence in delaying retirement.
103. FoBRP query how an agreed upon objective – we understand this to be phasing out of grazing in the park - through Toitū Te Whenua has been brought into question, and that this contributes to uncertainty of objective.
104. Pene Burton Bell and Russell Bell submit that the Council's officers have advised that there is sufficient budget and the fire risk is manageable to specify progressive retirement during the duration of the grazing licence, and that grazing reduction should therefore continue. Pene Burton Bell seeks the progressive reduction in grazing area starts with the most vulnerable ecological areas and waterways.
105. Merrin Pearse and Russell Bell raise that the proposed 4-year licence period will lead up to 2030 which is the end of Toitū Te Whenua, so this licence represents a key opportunity to implement its direction.
106. Hikoikoi Management Ltd, on behalf of The Taranaki Whānui ki Te Upoko o Te Ika (Port Nicholson Block Settlement) Trust, the Wellington Tenths Trust and the Palmerston North Māori Reserve Trust, discuss the benefits of progressive retirement and restoration. They submit that the gradual retirement of grazing within BRP is a central mechanism to achieve the environmental, cultural, climate and recreation outcomes of Toitū Te Whenua and aligns with the aspirations of mana whenua. They seek that the grazing licence should remain

consistent with Toitū Te Whenua, and do not support the use of grazing beyond a temporary land management tool to facilitate ongoing restoration.

107. Preserve Belmont Farm, Paul Robinson, Marlene Bowles and Peter Law seek that grazing is retained on any land until the Council is ready to undertake active restoration on that site, to manage undesirable growth, fuel loads and wildfire risk. The submitters generally consider retirement of land should only occur when the resources to plant, manage and maintain that land are available through long-term planning.
108. Grenville Gaskell and Trish Heath submit that the licence should not require any further land to be retired until master planning has been completed, and already identified priority restoration areas have been restored. They raise that Toitū Te Whenua was never intended to be an implementation plan and that the approach to retirement and restoration requires more refinement. The submitters are of the view that significant retirement has already occurred in absence of a master plan, and that no more should occur until the master plan has appropriately balanced community interests.
109. Preserve Belmont Farm supports the continuation of grazing as an effective land management tool that helps maintain the park's open landscape, supports recreation, manages vegetation, reduces fuel loads, and provides significant wildfire risk mitigation.
110. Preserve Belmont Farm and Paul Robinson raise specific concerns relating to wildfire and legacy-munitions risks given the military history of BRP, and cite a recent wildfire in Le Porge, France, where explosions of WWII shells and munitions were triggered by wildfire heat and contributed to fire risk. They consider this hazard also potentially affects emergency response access and safe operation during a wildfire. Submitters therefore seek that a precautionary approach is taken whereby grazing is not retired from areas surrounding, adjoining or providing a potential wildfire pathway towards historic ammunition magazines, demolition sites, dumping sites and incineration areas until the combined wildfire and legacy-munitions risk has been specifically assessed.
111. Although they don't specifically mention retirement, Paul Nation and Cora McCauley submit in support of continued grazing.

How the licenced land is restored

112. Several submitters raise concerns about retired land and the way that retired land is restored, which cannot be influenced by this grazing licence and is therefore not in scope (as outlined in Appendix 3).
113. However, these concerns do relate to the extent of the grazing licence, because retirement and restoration is the 'alternative' to grazing. The 'alternative' to grazing creates the conditions in which grazing may be necessary or desirable. They also apply to any land within the Licenced Area that might be retired or excluded from grazing within the licence period. We have therefore included concerns about the way that restoration occurs here to support a full analysis.
114. Robyn Smith, Forest and Bird, Stephanie Gregor and Russell Bell specifically submit in support of progressive restoration through natural regeneration as outlined by the BRP Long

Term Restoration Strategy. FoBRP acknowledge the concerns raised by Preserve Belmont Farm, but consider that they can be addressed through BRP master planning.

115. Preserve Belmont Farm, Grenville Gaskell and Trish Heath, Marlene Bowles, Paul Robinson, Paul Nation and Peter Law are generally of the view that restoration of retired land should not rely on a natural regeneration approach. This concern with the natural regeneration approach, as well as the recreational benefits of grazing (discussed in Section 5.6) is generally the reason why they do not support further reductions in the Licenced Area.

116. The concerns raised by these submitters relate to:

- *Wildfire risk:* Submitters are concerned that allowing unmanaged vegetation to establish and accumulate in retired areas will increase fuel loads and poses an unacceptable wildfire risk which is currently being managed through grazing. They submit that due to the location of BRP a major wildfire could potentially affect park users, neighbouring properties and infrastructure.
- *Gorse and other invasive weeds and pests:* Submitters are concerned that natural regeneration may result in large tracts of gorse and other invasive species in regenerating areas. Grenville Gaskell and Trish Heath raise specific concerns around gorse invasiveness given its long-lived seeds which can spread, fire hazards, and supporting other aggressive weeds such as blackberry. Peter Law submits that a 50 year-plus transition phase of a gorse nursery is not what the public was led to believe would happen when restoration was originally proposed in Toitū Te Whenua, and raises concerns around access, recreation values and public safety of widespread gorse. They specifically note that gorse could create a barrier in the park which could trap users during a fire.
- *Length of time to regenerate:* Submitters are concerned that it will take considerable time (up to 50 years) for the natural regeneration process to occur, and that in the meantime the amenity and recreation values of BRP will be adversely affected.
- *Cost to ratepayers:* Submitters are concerned that restoration of large areas creates ongoing weed and pest control needs at public expense, and that restoration must be properly funded, staged and maintained. Grenville Gaskell and Trish Heath consider that the extensive proposed use of natural regeneration indicates insufficient funding is available to enable the restoration envisaged by Toitū Te Whenua, and that this approach to restoration was not articulated in Toitū Te Whenua. They seek that available funding is focussed on the recently retired 300 hectares.

5.3.2 Analysis of submissions

117. The relevant issues to consider from submissions are:

- what the Licenced Area is (noting that the maximum area is limited by the scope of the application at 735 hectares), and

- whether and how the licence specifies a progressive reduction in the Licenced Area.

118. This proposed licence cannot influence what happens to land outside of the Licenced Area.

This matter is not in scope and needs to be worked out through the BRP master plan and ongoing park management. We make no recommendations on the proposed restoration approach through this report. However, because retirement and restoration are the ‘alternative’ case to grazing, concerns with the restoration approach are relevant to consider in the approach to the proposed grazing licence.

119. The BRP Long Term Restoration Strategy’s preferred approach was a staged restoration of approximately 100 hectares per year, which included about 20 hectares of planting each year and then reliance on natural regeneration for the remaining 80 hectares. We note that the BRP Long Term Restoration Strategy considered 100 hectares per year a target or average annual amount over 10 years, because officers recognised that achieving this amount each year in a linear fashion would likely be challenging¹⁵. We discuss the need for flexibility, as indicated in this strategy, further in paragraphs 78-80.

120. The proposed approach to the licence, as detailed in the February 2026 report, was to initially retire approximately 300 hectares for Year 1 of the licence (now reflected in the proposed Licenced Area) and then to rely on BRP master planning to inform future grazing retirements for years 2 to 4 of the licence¹⁶. The Expression of Interest for the licence indicated a more specific plan for when blocks would be retired.

121. A master planning process for BRP is currently underway, as detailed in the June 2025 and February 2026 reports. We will not repeat this information here except to say that the master plan is a key action from Toitū Te Whenua and will further refine, but not alter, direction from this plan. The master plan will develop a collaborative spatial plan for BRP and its staged restoration in partnership with mana whenua and with stakeholder and community input. The master plan is likely to have a particular focus on the approach to grazing across the park. A final master plan is currently expected in late 2027.

122. We also agree that the restoration of BRP needs to be cost effective, feasible, collaborative, strategic and carefully planned, with a good understanding of potential risks to the park’s environmental, recreation and cultural values. We generally consider that the BRP master plan is the most appropriate mechanism to balance these risks and opportunities with mana whenua and the community. The March 2026 workshop paper states that the master plan will, “*integrate restoration, recreation, fire management and land management needs over future years.*” In our view, the concerns raised by submitters about how retirement is prioritised, staged, funded and maintained can be managed through the master plan process, and then incorporated into the approach to grazing in the future.

123. The proposed licence terms and conditions, as supplied by the Applicant and included in Appendix 1, state that the licence is subject to Toitū Te Whenua, and “*The Licensed Area, stocking levels and permitted activities may be amended, reduced or phased over time to*

¹⁵ Paragraph 25 of BRP Long Term Restoration Strategy, Report 25.140 to Environment Committee, 19 June 2025.

¹⁶ Paragraphs 33, 45 and 61 of the February 2026 report.

give effect to that plan.” It also states that the Annual Operations Plan will cover, “*staged changes to grazing if needed to implement Toitū Te Whenua*”. The termination conditions also state that the licence can be terminated in part to reduce the Licenced Area.

124. It is our understanding the Applicant does not currently intend to reduce the Licenced Area extent, and officers clearly state this in the March 2026 workshop paper¹⁷. The licence conditions as proposed do not guarantee further reductions in Licenced Area across the four-year licence period. They do, however, provide a mechanism through which progressive reductions in the Licenced Area (i.e. retirement) could occur, and it appears that the Applicant’s intent is to review the extent of the Licenced Area on an annual basis. Although the licence does not specifically stipulate how, where and when future land may be retired, it provides a possible pathway for future reductions in extent. Once the BRP master planning process is complete, if deemed feasible to do so, the agreed approach to retirement could start to be incorporated into the licence through the Annual Operations Plan.
125. We agree that the approach outlined above is sensible. Throughout the background documentation and analysis to the proposed grazing licence, the need for flexibility is considered necessary to navigate the multiple complexities and uncertainties around the restoration of BRP. We agree that the master planning process is the best mechanism to spatially navigate these complexities and ensure that all trade-offs are considered. This approach also addresses concerns raised by Grenville Gaskell and Trish Heath that future restoration decisions should not come ahead of the master planning process.
126. We therefore do not consider that the licence conditions should specify where and how land will be retired prior to the completion of the master plan.
127. The effect of the licence conditions as proposed is that areas previously identified for retirement prior to 2030 may remain grazed until 2030, but could be retired in the future as a result of master planning or other mutual agreement. We recognise submitters’ concerns that if no further retirement occurs, this would represent a shift away from the approach outlined in the BRP Long Term Restoration Strategy and February 2026 report. The BRP Long Term Restoration Strategy is a non-statutory document. Toitū Te Whenua sets the direction for phasing out of grazing while providing flexibility on how quickly this can occur. We therefore do not consider that this poses a regulatory issue.
128. We acknowledge submitters’ view that the licence period runs up to the end of Toitū Te Whenua, so this licence remains a key opportunity for its implementation. We do not consider this to be an issue. The BRP master plan will align with Toitū Te Whenua and its direction is therefore likely to be implemented beyond 2030.
129. As far as practicable, it is important for conditions to be clear and certain about what might occur and when. In this case we consider that reference to Toitū Te Whenua in the licence conditions provides sufficient reference to the master plan. We recommend minor amendments to the licence conditions to improve clarity, while also maintaining the necessary flexibility in the extent and nature of the Licenced Area over the four-year period.

Wildfire risk

¹⁷ Paragraph 11 of the March 2026 report

130. We acknowledge the concerns raised by submitters around wildfire risk, and the potential interaction with legacy munitions given the military history of BRP. The BRP Long Term Restoration Strategy recognises that wildfire is a real risk with undertaking restoration, and that it will take at least 20 years until the tree canopy is established¹⁸. The restoration plan in the February 2026 report states that the lowest risk land use for the park would be restored forests and wetlands, so wildfire risk will reduce in the long term, and will need to be managed as parts of the park transition to that state¹⁹. We understand that grazing is a key aspect of supporting this transition, particularly the continued grazing of ridge tops to create a significant fire break.
131. We understand that the Applicant has had a wildfire risk assessment undertaken for the eastern and western parts of the Park, which they are starting to implement and will continue to implement over the coming years. Some specific actions from this plan, such as a 50-metre reduced fuel firebreak along ridgelines, are relevant to their approach to the proposed licence. This is not within our area of expertise, however it appears that wildfire risk can be managed in grazed and excluded parts of the Licenced Area according to this plan.
132. We also do not consider that any activities proposed through this licence will increase wildfire or legacy munitions risks, given the fact that this area has been grazed for several decades. We agree with the Applicant and submitters that stock grazing is a useful tool to manage vegetation growth and thereby wildfire risk, and that Toitū Te Whenua permits grazing for the purpose of open space management²⁰.
133. Fire risk management of retired areas, as well as potential safety implications of legacy munitions in retired areas, are best investigated and managed through the BRP master plan. If the master plan determines that further retirement can be funded and delivered safely prior to 2030 there is a pathway for this to occur, and vice versa.

Natural regeneration approach

134. What happens on land that is retired is not within the scope of the proposed grazing licence, however we comment on it briefly given its relevance as the 'alternative' to grazing in the proposed Licenced Area.
135. We consider that the opportunities and risks of natural regeneration have been carefully considered and will be navigated through the BRP master plan and iterative restoration planning, which can be implemented into the grazing licence as relevant through the Annual Operations Plan. A spatially strategic approach will be necessary to optimise the benefits of grazing, planting and ongoing (and cumulative) weed/pest control across the landscape, which can be navigated through master planning.
136. We therefore do not agree with submitters' view that land should only be retired when it will be fully planted; in our view natural regeneration is a practical approach to restoring large areas while balancing cost effectiveness and restoration speed. On the other hand, the need

¹⁸ Paragraph 67 of the June 2025 report.

¹⁹ Paragraph 24 of the February 2026 report.

²⁰ Page 199 of Toitū Te Whenua

for strategic planning of the natural regeneration approach supports the need for a level of flexibility in the extent and nature of grazing across the park.

5.3.3 Conclusions

137. The management of weeds, pests, wildfire and munitions risk in retired areas is best addressed through the BRP master plan and cannot be influenced by this licence. We address responsibilities for wildfire risk and pest/weed management in grazed areas in Section 5.5.

138. Reviews of the Licenced Area may involve progressive reductions in the grazing extent from 2027 to 2030. However, we recognise that this may not be possible and consider that if it does not happen it does not present a regulatory issue.

139. We recommend minor amendments to the wording of the licence conditions to improve clarity.

Current wording

Toitū Te Whenua

- *The licence is subject to Toitū Te Whenua.*
- *The Licensed Area, stocking levels and permitted activities may be amended, reduced or phased over time to give effect to that plan.*

Proposed wording (changes shown in red)

Toitū Te Whenua

- The licence is *granted pursuant to the Reserves Act 1977 and subject to* Toitū Te Whenua.
- *To implement Toitū Te Whenua a review of t*~~The Licensed Area may:~~
 - i) *reduce the Licenced Area over time, and*
 - ii) *amend or reduce* stocking levels and permitted activities ~~be amended, reduced or phased over time to give effect to that plan.~~

5.4 Environmental impacts of stock grazing

5.4.1 Summary of submissions

Location and extent of grazing

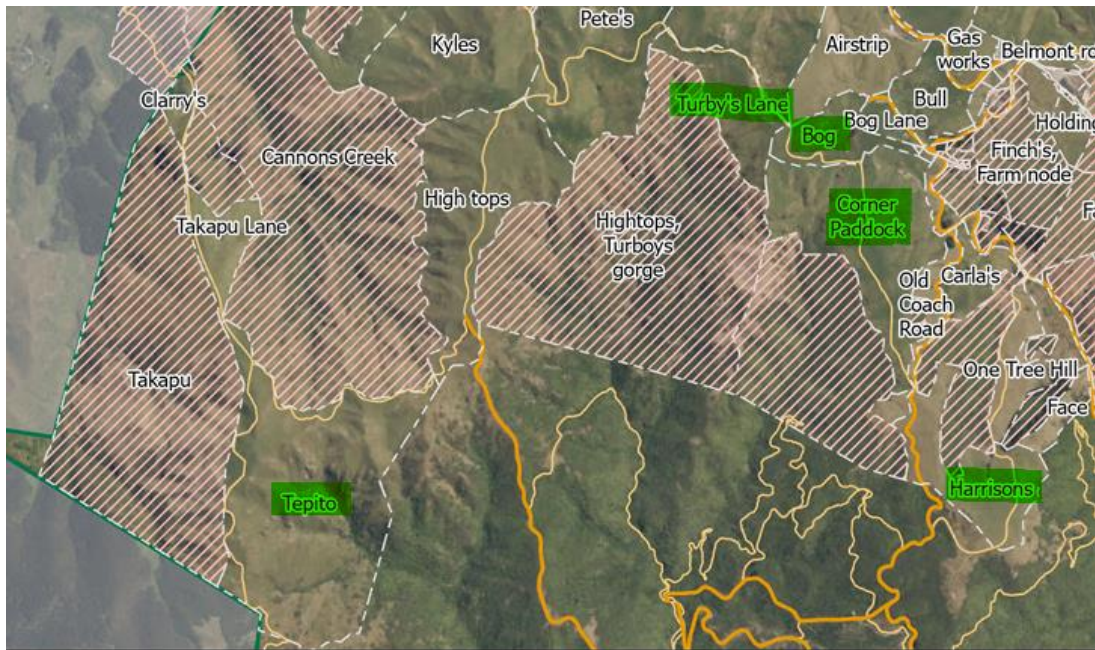
140. Forest and Bird seek that ecological mapping and a values assessment are undertaken to inform priority areas for retirement, and that grazing is limited to areas necessary to protect priority areas.

141. Ngā Kaitārore ki Pito One seek that Te Pito block is excluded from the proposed licence. They consider that the block is particularly marginal land and is wholly unsuitable for grazing particularly due to the block's steep topography and high erodibility. Additionally, the block has a number of tributary streams and springs which could lead to sedimentation and faecal matter leaching into a significant portion of the Korokoro Stream Catchment. The submitter notes that the cost to install troughs and reticulated water to this block will be a considerable expense due to its location to the side of the rest of the grazing area. The

submitter urges the Council to visit Te Pito block to gain an understanding of how integral the area is to the catchment and unsuitable it is for ongoing grazing.

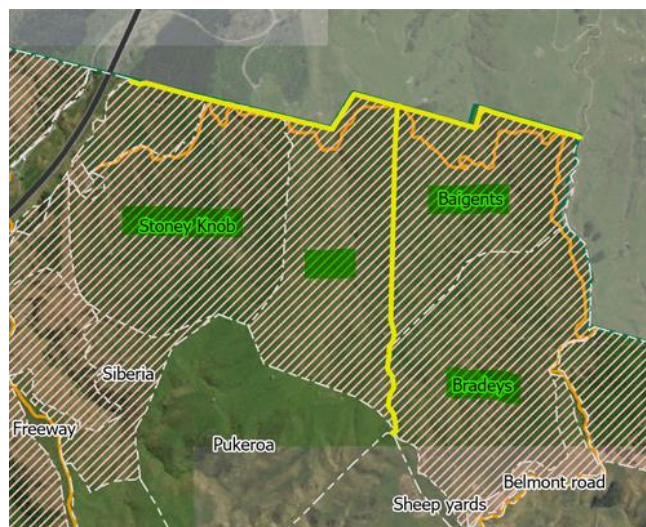
142. Ngā Kaitārore ki Pito One also submits including Te Pito block is inconsistent with the Environment and Climate Committee recommendation in February to only continue grazing outside of the headwater of the Korokoro stream. They submit that Te Pito block should be removed along with Turby's Lane, Harrisons, Bog and Corner Paddock Blocks (see Figure 2).

Figure 2: Extract of proposed grazing licence area showing Te Pito, Turby's Lane, Bog, Corner Paddock and Harrisons



143. Stephanie Gregor raises particular concerns about Stoney Knob, Lewins, Baigents and Bradeys (amongst others) being indicated as part of the proposed grazing licence, and the fact that the licence refers to 735 hectares rather than the 650 initially indicated (see Figure 3).

Figure 3: Extract of area outside of proposed grazing licence showing Stoney Knob, Lewins (label missing), Baigents and Bradeys.



Adverse environmental effects

144. FoMR and Pene Burton Bell seek that indigenous flora and fauna are protected from the impacts of grazing. The submitter raises concerns that grazing activities impact on regenerating native vegetation, riparian and water systems, and land that is erosion prone.
145. Robyn Smith raises concerns about the impact of sediment load from grazing activities in BRP on the streams and harbours in Te Whanganui-a-Tara and Te Awarua o Porirua. The submitter generally seeks wide planted riparian margins to help prevent sediment reaching freshwater. They submit that wide planted riparian margins will help prevent sediment from reaching freshwater, and that community plantings can be used to support lower costs of revegetation.
146. Forest and Bird seek that the licence includes informed, clear and stringent conditions for setbacks for riparian and wetland protection. The submitter references Fenemor and Samarasinghe (2020)²¹ which found that an appropriate setback requires at least ten metres from any permanent river, lake, or wetland to effectively filter runoff from land.
147. Forest and Bird also seek that the use of herbicide and fertiliser are prohibited by the licence. The submitter considers that farming 5,000 stock units can't occur without unacceptable environmental impacts.
148. Pareraho Forest Trust seek that the herbicide spraying is ceased, and raises concerns about the extent of herbicide spraying of wetlands and native bush as well as gorse under previous licences.
149. Russell Bell submits that the licence perpetuates adverse effects on freshwater and biodiversity. They submit that the AEE does not address the effect of distributed effluent from cattle into waterways or the effect of added fertilizer and sprays on gorse.
150. Tamsin Falconer submits that the conditions of the grazing licence and how they are monitored and managed should be informed by the Korokoro Environmental Group Water quality and biomonitoring summary 2026 report.
151. Merrin Pearse submits that previously grazing animals have entered waterways and catchment headwater to access drinking water, which has caused damage to the ecology of the stream.
152. Paul Robinson submits that grazing can continue alongside riparian planting, protection of waterways, and native restoration to achieve environmental restoration objectives.

Proposed stocking rate

153. Forest and Bird and Russell Bell submit that a stocking rate of 6.8 stock units per hectare (SU/ha) over 735 hectares, which at maximum capacity is equivalent to 5,000 stock units, is too high. Russell Bell submits that these licence dimensions do not provide any opportunity for restoration or exclusion.

²¹ [2057-TSDC167-Riparian-setback-distances-from-water-bodies-for-high-risk-land-uses-and-activities\[1\].pdf](#)

154. Forest and Bird and Russell Bell also submit that the applicant has not demonstrated that this is the minimum stocking rate to support land management. Forest and Bird seek that suitable stocking rates are re-calculated.

155. Pareraho Forest Trust raises that there is insufficient information provided on how stock numbers were set and note that the proposed density is comparable to neighbouring commercial farms.

156. Several other submitters indirectly raise concerns about previous farming practices and stock intensities.

5.4.2 Analysis of submissions

Location and extent of grazing

157. We acknowledge Forest and Bird's submission that ecological mapping and values assessments should be undertaken to inform priority areas for retirement. Within the proposed Licenced Area, cattle will be excluded from environmentally sensitive areas from the commencement of the licence.

158. In response to our request for information, the Applicant has advised that environmentally sensitive areas, for the purpose of this licence, are:

Wetlands, ephemeral seeps, streams, riparian margins around all streams and intermittent channels, native forest remnants and regenerating indigenous vegetation, restoration planting areas and erosion-prone land.

159. We recommend that the licence conditions refer to 'environmentally sensitive areas' rather than 'sensitive areas' to make them clearly distinct from definitions in any other statutory instruments. We also recommended that the conditions provide an explanation of what environmentally sensitive areas are for the purpose of this licence.

160. Environmentally sensitive areas have been mapped but not ground-truthed and their extent is uncertain until this process is undertaken. If the licence is granted, it is our understanding that this ground-truthing process will occur before stock arrives to confirm the effective grazing area, given the significant resourcing involved in this process. The mapping determined through this process will then be added into the virtual fencing system. We discuss this further in paragraphs 284-287.

161. Which areas of the licenced area are prioritised for future retirement will be determined through the BRP master planning process. We understand that the master planning process will include ecological mapping exercises to determine where restoration will be prioritised.

162. Ngā Kaitārore ki Pito One raise several concerns regarding the suitability of the Te Pito block for grazing. Te Pito block is approximately 37 hectares; it encompasses a wide stretch of ridgeline which slopes south into the Korokoro Stream Catchment. The block includes a high proportion of high-susceptibility landslide risk land, and a few small gullies containing small wetland areas, that feed into the Korokoro Stream.

163. We asked the Applicant for further information on the Te Pito block and whether any particular assessment on the block had informed its inclusion in the licence. The Applicant advised that while no specific assessment had been undertaken, the ridgelines in these areas are considered high priority for fire threat reduction as part of the wildfire risk management plan for BRP. This is achieved primarily through maintaining a 50 meter-wide reduced fuel firebreak along ridgelines, which without grazing in this area will require a significant strip to be mown and significantly increase operational costs. Inclusion of Te Pito block in the grazing licence will allow the Applicant to maintain a grazed low-fuel fire break as well as the open tracks along the ridgeline which supports recreational use.

164. In response to the Ngā Kaitārore ki Pito One's concerns around the environmental impacts of grazing in Te Pito, we understand that a large proportion of the block will be subject to stock exclusion areas based on the criteria for environmentally sensitive areas. This includes many of the steeper, erosion-prone areas and lower wetland sites within the Te Pito paddock, in addition to the 5-metre minimum buffer/setback distance from these areas. We consider that the exclusion of environmentally sensitive areas within the block from the effective grazing area provides in part for the relief sought by Ngā Kaitārore ki Pito One while enabling the ridge tops to be maintained for both recreational and public access purposes. Before ground-truthing of the environmentally sensitive areas we cannot confirm how much of the Te Pito block would be included in the effective grazing area.

165. In response to Ngā Kaitārore ki Pito One's concerns around the practicalities of providing reticulated water for stock to the Te Pito Block, the Applicant has advised that they have a duty to comply with the requirements of the Animal Welfare Act 1999 to ensure the physical, health, and behavioural needs of the animals are met.

166. Ngā Kaitārore ki Pito One has also asked specifically for the exclusion of Turby's Lane, Harrisons, Bog and Corner Paddock Blocks from the Licenced Area. We have asked the Applicant to comment on these blocks, and they have advised that they are included in the proposed licence area for several reasons:

- They are important ridgelines to graze for fire risk reduction and are included in the wildfire management plan referencing a 50m wide grazed strip.
- The blocks have major tracks running through them that have important recreational value to the park.
- They are vital sites for grazing logistics and efficiencies for the grazier as they are required for moving stock through the Licenced Area.
- Specific to Harrisons, it is predominantly clean pasture. There are higher priority areas to exclude from grazing in the park.

167. As with Te Pito block, areas within these blocks deemed to be environmentally sensitive (as defined in paragraph 158) would be excluded from the effective grazing area.

168. We acknowledge the submitter's concern that the inclusion of Te Pito block in the Licenced Area is inconsistent with the Environment and Climate Committee recommendation in February to only continue grazing outside of the headwaters of the Korokoro Stream. Only

part of the block is within the headwaters and much of this area is likely to be excluded. We refer to the justification for the block's inclusion in paragraphs 163-165 above.

169. We note Stephanie Gregor's concerns that Stoney Knob, Lewins, Baigents, and Bradeys blocks are included in the proposed grazing licence. We have reviewed the map of the proposed licence area and confirm that these blocks are not included in the proposed licence, with one exception being a grazed fire break along the ridgeline between Lewins and Baigents.

170. Stephanie Gregor is also concerned that the Applicant has proposed a licence area of 735 hectares rather than the 650 hectares (decreasing progressively by 80-140 hectares annually) initially indicated in the Expression of Interest. We refer to our analysis on the issue of progressive retirement in Section 5.3. On the matter of the licence area being 735 hectares, this area is an approximate of all the blocks included in the proposed licence. The effective grazed area, being the area that is actually grazed (excludes stock exclusion areas) is currently estimated to be 600-650 ha, however this may change after environmentally sensitive areas are ground-truthed and setbacks are applied²².

Proposed stocking rate

171. Forest and Bird and Russell Bell seek confirmation that the stocking rate will be maintained at the lowest possible rate to achieve the land management outcomes.

172. There are several references in the AEE that state that the relatively low stocking rate combined with other exclusion measures will appropriately manage the environmental impacts of grazing. We have provided separate analysis on the proposed grazing licence's approach to manage environmental impacts in paragraphs 185-200.

173. We understand from the Applicant that their approach to the stocking rate has changed since the licence was publicly notified. They have advised that the actual stocking density will need to vary to suit land class, terrain conditions and seasonal fluctuations in pasture availability, as well as for specific fire risk management purposes (for example brief, more intense grazing of a fire break). The licence conditions therefore set a stock density of 7 SU/ha as a maximum annual average rather than a limit at any given time.

174. The Applicant has confirmed that the stock density will always be set at the minimum necessary to manage vegetation growth. Stocking rates will need to vary in order to achieve this and support good management practices. The licence conditions state that the licensee must, "*manage and maintain the Licensed Area in accordance with the Good Management Practices set out in the Grazing Licence Practice Guide.*" We understand that this Good Management Practices guidance document will be included in the Applicant's report. We recommend that the Applicant provide more information on how Good Management Practices will inform the management of stock density to avoid over-grazing and mitigate any associated adverse effects on receiving environments, soil conditions or recreation values.

175. The Applicant considers that an adaptive management approach is the best way to achieve good management practices and minimise effects on the environment and recreation, thereby complying with Toitū Te Whenua. We agree with the Applicant that establishing a

²² Paragraph 9b of March 2026 workshop paper

year-round maximum stocking density is not the best approach to achieve its management objectives through the proposed licence. Applying a maximum density over such a large area means that the real density in particular blocks may be greater than this. Instead, we consider using the minimum necessary stocking rate and the application of good management practices as the starting point, best implements Toitū Te Whenua.

176. However, we also acknowledge that this approach does not provide certainty to submitters and park users about what the stock density will be at any given time. Given the AEE refers to 7 SU/ha as an appropriate density, we consider specifying 7 SU/ha as a maximum annual average in the licence conditions is sensible. This will ensure that if the density is increased for a period where vegetative growth is more intensive, the stock density will also need to be lower than 7 SU/ha for other parts of the year. Because the stock density at any given time will need to implement good management practices in accordance with the Grazing Licence Practice Guide, our understanding is that stock density will only be increased when the land conditions can support it.
177. In response to submissions about whether total stock units or stock density is the primary measure, we acknowledge the concerns from submitters that it is not clear from information provided to submitters whether 5000 stock units or 6.8 SU/ha is proposed for the licence.
178. We have reviewed the licence conditions and note that total stock units is not included in the licence conditions. We understand that 5000 stock units was used as an example in the Questions and Answers to illustrate how the stocking rate is used to calculate the maximum number of stock grazing units²³.
179. If the licence is granted, the Applicant intends to undertake more granular mapping and ground-truthing of environmentally sensitive areas where stock must be excluded from, which will then confirm the extent of the effective grazing area (estimated to be 600-650 hectares, though not yet known). This effective grazing area, as well as the average stock density and Good Management Practices (as referred to in the licence) will determine the total stock numbers, which will likely vary. If the effective area reduces through more exclusions, so will the total stock number.
180. The Applicant has indicated that the actual total stocking rate will vary according to pasture availability, seasonal conditions and environmental constraints, but that the maximum annual average density will be 7 SU/ha. We asked the Applicant for more information on where 7 SU/ha was derived from. They advised that the stocking rate was determined from the Land Use Capability (LUC) classification of the proposed areas (mostly LUC 5 and 6) and the Beef and Lamb farm benchmarks for North Island hill-country farms.
181. It seems that submitters' concerns about the stocking rate and environmental impacts of grazing understandably come from observations of grazing practices and stock densities under previous grazing licences at BRP. It is our understanding that practices under this licence will be different, including more protection of environmentally sensitive areas and lower stock densities. It would be helpful if the Applicant provided some information and

²³ [Belmont Regional Park Grazing Licence Renewal Questions and Answers](#)

context about grazing under the previous licence, including the stocking rate, and what is proposed to change under this new grazing licence.

182. We consider that the Applicant is motivated to ensure best management practices are applied, given they sit within the Council who is the landowner and environmental regulator, and administer Toitū Te Whenua. Given this, we consider that they will work to actively manage stock densities to mitigate environmental, cultural and recreational effects.

183. However, we consider that the Applicant should provide further information to demonstrate that the maximum average annual stocking rate of 7 SU/ha is an appropriate level to support land management. Given that it is now a maximum average rather than a constant limit, some further commentary on how this average will be achieved would be helpful.

184. In response to submissions, and given the Applicant's evolved approach to stock density, we consider that the wording in the licence conditions should be refined to make it clear how the stock densities will work in practice, including mention of the effective grazing area and the fact that stocking densities will be the minimum for land management purpose. We consider that providing greater certainty about how stock densities will be set may address submitters' concerns, particularly now that the licence stipulates an average density rather than a maximum. We have suggested some amendments in Section 5.4.3.

Adverse environmental effects

185. We note that submitters have raised several concerns about the management of adverse effects on waterbodies and biodiversity in BRP. Specifically, submitters identified adverse effects on natural values from increased sediment load, effluent runoff, stock in waterways, use of herbicides and fertiliser, and damage to native flora and fauna including regenerating native vegetation. We have considered whether the proposed grazing licence has included sufficient management practices in place to manage the adverse effects of grazing.

186. Several submitters have raised concerns about the impact of stock in or near waterways and headwaters.

187. The AEE states that the grazier will be responsible for managing the setbacks [from surface waterbodies and wetlands], which at a minimum will be 3 metres for rivers and lakes, however, in most areas will be more. The setbacks will be achieved through virtual exclusions using halter technology. Setbacks are intended to manage the effects of sediment, effluent runoff and prevent stock from accessing waterways.

188. Forest and Bird submit that a minimum setback distance of 10 metres is required to effectively filter runoff²⁴.

189. In response to our request for further information, the Applicant has advised they are proposing a minimum 5 metre exclusion zone on each side of any waterway (and other environmentally sensitive areas). The Applicant notes that the setback will likely be more than 5 metre in some locations depending on surrounding terrain. They consider that the proposed 5+ metre setback will ensure any effects on stream ecology (and other

²⁴ [2057-TSDC167-Riparian-setback-distances-from-water-bodies-for-high-risk-land-uses-and-activities\[1\].pdf](#)

environmentally sensitive areas), including from distributed effects of stock effluent, are less than minor.

190. We note the discrepancy in the minimum setback figures between the Applicant and Forest and Bird. We observe that the minimum setback of 5 metres is above the national standard for stock exclusion²⁵, and greater than the setback assessed in the AEE. We request that the Applicant provides further information on the suitability of a 5 metre setback compared to a 10 metre setback for the proposed licence area.
191. In response to Forest and Bird's submission that the licence includes informed, clear and stringent conditions for setbacks for riparian and wetland protection, we recommend that the proposed licence conditions set out the minimum setback from environmentally sensitive areas. Because we have asked the Applicant to provide more information on the suitability of a 5 metre setback, the proposed set back included in our recommended amendments may change subject to the Applicant's response.
192. In response to Robyn Smith, we agree that the riparian margins excluded from grazing should be planted and restored according to wider parks management and the BRP master plan, to support implementation of Toitū Te Whenua. This process will occur separately to the proposed grazing licence.
193. As discussed in paragraphs 173-174, the Applicant has advised us that their approach to the stocking rate has evolved, but that the density will always be the minimum necessary for land management. We understand they intend to provide further information on this matter in their report. In our view the use of lighter classes of cattle and the proposed adaptive approach to the stocking rate is likely to, if applied well, prevent grazing from causing widespread pugging, overgrazing or loss of pasture cover. This would help to reduce the extent of exposed soil and risk of sediment entering waterways.
194. Several submitters have identified the potential for herbicide and fertilizer use to have a negative effect on the regional park's waterways. In particular, Russell Bell is concerned that the licence does not preclude the use of herbicide and fertiliser by the licensee. The AEE sets out that there is no intention to apply fertiliser or undertake gorse spraying within the grazing area. We agree with submitters that it is unclear whether fertiliser use and spraying will occur and how the effects will be managed given intentions could change.
195. In response to our request for information, the Applicant confirmed that no fertilizer will be used in the grazed areas. In Section 5.4.3 we recommend some amendments to prohibit fertiliser use to support better compliance with Toitū Te Whenua Policy 19P, given that the Applicant has identified fertiliser use as a high impact activity as discussed in Section 5.7.2.
196. The Applicant also confirmed that no spraying will occur to enable grazing in grazed areas. For clarity this does not mean that spraying will not occur within the grazed area. However, any spraying will be completed by the Council for other park management purposes independent of the grazing. As above, we recommend that the licence conditions prohibit the use of herbicides for the purpose of grazing (within the effective grazing area) to support better compliance with Toitū Te Whenua Policy 19P, given that the Applicant has identified

²⁵ [Resource Management \(Stock Exclusion\) Regulations 2020 | New Zealand Legislation](#)

spraying as a high impact activity as discussed in Section 5.7.2. We recommend amendments in Section 5.4.3, which would still provide some scope for targeted herbicide application within excluded areas if necessary for biosecurity purposes.

197. With confirmation that the proposed grazing licence will not include the use of herbicides and fertilizer we do not consider that the AEE is insufficient in addressing the effects of their use.

198. In response to submissions seeking that indigenous flora and fauna are protected through the grazing licence, the Applicant notes stock will be excluded from environmentally sensitive areas through virtual fencing, which includes native forest remnants, regenerating indigenous vegetation, and restoration planting areas. Additionally, the proposed grazing licence area only contains land that has been grazed for 30 years plus prior to this licence. This means there is no new exposure of indigenous flora and fauna to cattle as a result of this licence.

199. We acknowledge Paul Robinson's submission. We consider that the licence conditions protect waterways through stock exclusion and that efforts to restore retired land are a separate process to the grazing licence.

200. We acknowledge Tamsin Falconer's submission that the Korokoro Environmental Group Water quality and biomonitoring summary 2026 report inform the conditions of the grazing licence and how they are monitored and managed. We have reviewed that document provided and consider it provides a useful record of the existing Korokoro stream health for monitoring the impact of future activities. We have provided the Applicant with this report through the submissions, however we do not recommend any amendments to the proposed licence in response to it.

5.4.3 Conclusions

201. We recommend the Applicant provides more information on:

- Stock densities under previous grazing licences, and
- How and why the maximum average annual stocking rate of 7 SU/ha is appropriate to support land management, and
- How Good Management Practices will be applied to ensure stocking densities are always the minimum necessary for land management while being able to fluctuate, and
- Further information on the suitability of a minimum 5 metre setback from environmentally sensitive areas, compared to a standard 10 metre setback.

202. We recommend some amendments to the proposed licence conditions to provide clarity on the stocking rate, the use of fertiliser and herbicides, and setbacks from environmentally sensitive areas. We note that the extent of setbacks shown in our amendments may be subject to change following further information from the Applicant.

Proposed wording (changes shown in red underline)

The licensed area is approximately 735 hectares, including the dwelling, but ~~the effective grazing area excludes areas where stock will not have access, excluding areas marked as excluded on the plan as shown~~ in Attachment One [plan attached to the final licence conditions, map not yet developed].

...

Permitted Use

- An average annual grazing rate of up to 7 SU/ha stock units ~~across the effective grazing area, and never greater than the minimum stock density necessary for land management purposes, in accordance with the Grazing Licence Practice Guide.~~
- This ~~average~~ grazing rate will be subject to review through the Annual Operations Plan process.

...

Licensee Obligations

The Licensee must:

....

- exclude stock from waterways, drains, wetlands and ~~environmentally~~ sensitive areas and ~~from a setback area of at least 5 metres measured from the mapped edge of environmentally sensitive areas (which for waterbodies means the edge of the bed) unless approved in writing by the Licensor prior to stock access being granted;~~

...

- ~~not apply fertiliser or herbicides within the Licenced Area.~~

~~Note – for the purpose of this licence and as classed by the application, environmentally sensitive areas include wetlands, ephemeral seeps, streams, riparian margins around all streams and intermittent channels, native forest remnants and regenerating indigenous vegetation, restoration planting areas and erosion-prone land. These areas have been mapped and are shown in Attachment One [to the final licence conditions, map not yet developed].~~

5.5 Grazing logistics and responsibilities

5.5.1 Summary of submissions

203. Several submitters raise specific queries, requests or concerns about how the licence manages grazing practices and sets up responsibilities.

204. FoBRP seek that stock management practices reflect wider community engagement.

205. Preserve Belmont Farm and Ngā Kaitārore ki Pito One submit that water troughs and reticulated water supplies must be provided to support the exclusion of stock from natural water sources.

206. Russell Bell queries whether the land will have capacity to grow sufficient annual feed to support stock at a density of 7 SU/ha, and therefore raises concerns that stock may exacerbate erosion and downstream sedimentation, or that fertiliser may need to be used.

207. Marlene Bowles seeks that the licence includes sheep and cattle.

208. Pene Burton Bell supports the use of electronic halters to manage stock.
209. Forest and Bird raise the fact that the virtual fencing system is untested at BRP.
210. Pareraho Forest Trust query how grazing practices will be reviewed and adjusted, as well as how the Annual Operations Plan will be developed and how the community and mana whenua will be able to input into it.
211. Forest and Bird seek that there are penalties for breaches of access to waterways, wetlands and riparian areas, and that the licence can be terminated if conditions are not met. They seek further information on how compliance with licence conditions will be monitored.
212. Stephanie Gregor raises concerns around unruly stock; specifically previous experiences where cattle have been aggressive at times, impacting their ability to use and enjoy the park.
213. Pareraho Forest Trust submit that the licensee's duty to control pests and weeds is unclear. Pareraho Forest Trust seek that the Applicant collaborate with stakeholders on the licensee's duty and rights regarding pest and weed control.
214. Preserve Belmont Farm seek that the Council have continuing responsibility to ensure that wildfire risks created through changes in land management are appropriately identified and managed.

5.5.2 Analysis of submissions

Stock management

215. In response to FoBRP, we consider that from the information we have, the proposed grazing licence conditions as they relate to stock management generally reflect good management practices, which aligns with direction in Toitū Te Whenua.
216. In response to submissions related to water sources for cattle, these matters are dealt with under the Animal Welfare Act 1999, which includes requirements relating to adequate and sufficient food and water.
217. In response to Russell Bell, the Applicant says that it will work with the grazer to ensure that good management practices are applied, which includes management of stock densities to ensure they are appropriate for the terrain, land class and seasonal conditions. We also note that the land has an established productive pasture base from its history of grazing, and therefore consider that the risks of over-grazing are minimal. Fertiliser will not be used as addressed in Section 5.4.
218. In response to Marlene Bowles, we requested that the Applicant provide information on whether sheep grazing was considered. The Applicant responded:

"Sheep grazing alongside cattle was also considered because of the lower risk of pugging and soil compaction. However, no suitable virtual-fencing system for sheep is currently available in New Zealand, meaning substantial additional physical fencing would be required to exclude sensitive areas from sheep, along with considerable maintenance costs for existing fences. Cattle grazing using virtual fencing was preferred as it provides greater

flexibility to exclude waterways, wetlands and other sensitive areas and manage grazing pressure more accurately, as well as lower costs to fence maintenance.”

219. We are comfortable based on the consideration provided by the Applicant that the use of cattle over sheep for grazing is compliant with the policy direction in Toitū Te Whenua to avoid and reduce farming infrastructure investment (20P), and avoid impacts from grazing through exclusion of cattle from waterways, wetlands and other environmentally sensitive areas (12P).

Virtual fencing

220. We asked the Applicant to comment on how breaches to virtual fencing and unruly stock will be managed. They provided the following response:

Cattle fitted with virtual fencing collars will be trained before being managed using virtual boundaries within the park. This generally involves a 7–10 day training period, during which animals learn to respond to audio and vibration cues associated with the virtual boundary. Training will occur either off-farm or within a paddock containing no sensitive areas. Peer-reviewed research has found that cattle learn virtual fencing cues rapidly and can be effectively contained once trained.

Once operational, the collar system provides real-time information on animal location and system performance. Where an animal breaches a virtual boundary, becomes disconnected, or another issue occurs, the farmer can respond promptly. This may involve returning the animal to the appropriate grazing area, moving the affected mob to a secure holding paddock, or resolving the collar or system issue.

221. The Applicant explained that cattle that either do not respond to training or repeatedly breach virtual boundaries will be removed. We are satisfied with this approach and consider this system will allow prompt response to virtual fencing breaches to minimise potential impacts on the environment or on park users. We consider that this will also assist with identifying and removing unruly stock promptly as required.

222. We acknowledge Forest and Bird’s concern that virtual fencing is untested at BRP, however we consider that it presents considerable opportunities for low impact land management and the ability to direct expenditure on fencing infrastructure toward other objectives. We therefore consider that it is worthwhile to implement this system at BRP with appropriate checks and reviews of the system’s performance. In response to Forest and Bird’s submission, in Section 5.5.3 we have suggested an addition to the licence conditions to include a review of the system’s performance into the Annual Operations Plan.

Annual Operations Plan, breaches and monitoring

223. In response to Pareraho Forest Trust, the Applicant has advised that the Annual Operations Plan is, “*an adaptive management tool to support the working relationship between the Applicant and the stock owner/grazier*”. It is an agreement between the Applicant and the *grazier* on how they intend to graze and manage the Licenced Area. It will be developed annually and include stock numbers, stocking rates, grazing rotations, stock exclusion measures, environmental management actions, restoration/retirement priorities, and

maintenance programmes for the grazing area, as set out in the proposed licence conditions in Appendix 1.

224. In response to Forest and Bird's request for there to be penalties or licence termination for breaches, the proposed licence conditions state that termination of the licence is possible if, "*the Licensee breaches the licence and fails to remedy the breach*", which would include a breach to the condition to, "*exclude stock from waterways, drains, wetlands and sensitive areas unless approved*" and "*ensure virtual fencing and electronic stock control systems are properly installed and operated*". The licence conditions also state that the Annual Operations Plan will be used to review performance against the plan, which could be used to address issues with repeated breaches or issues with the virtual fencing system. We consider that this approach is appropriate at this stage, however we agree with Forest and Bird that the consequences of licence breaches should be clearly set out in the conditions. We therefore consider that this wording could be more certain and specific, and we have suggested wording amendments in Section 5.5.3.

225. The Applicant has advised that quarterly inspections will be undertaken by rangers to check against the Annual Operations Plan, as well as generally working closely with the grazier to manage any issues as they arise. We consider this is to be appropriate, however more information on how monitoring and compliance with the licence is expected to work in practice would support compliance with Toitū Te Whenua.

Licencee responsibilities

226. In response to Pareraho Forest Trust, the Applicant has advised that the licensee will not be required to control weeds and pests in the licence area, and weed control will be undertaken by the Council. There may be opportunities for community input into this through the BRP master plan process.

227. In response to Preserve Belmont Farm, the Applicant has advised that responsibility for wildfire risk will solely be with the Council. The grazing licence is proposed as a tool to reduce available fire fuels across the park and therefore contribute to the management of wildfire risk.

5.5.3 Conclusions

228. We recommend that the Applicant provides more detail about how monitoring and enforcement will be undertaken with the grazier through the Annual Operations Plan, and how licence breaches will be managed.

229. We recommend the following amendments in response to submissions to provide greater certainty on expectations around breaches. We also make a minor change to specify 'environmentally sensitive areas' and that written approval must be provided prior to departing from the Annual Operations Plan.

Proposed wording (additions shown in red)

Annual Operations Plan

The Licensee must prepare and submit an Annual Operations Plan:

- *before commencement; and*
- *by 30 June each subsequent year, or another date required by the Licensor.*

The plan must cover:

- stock numbers, type, stocking rates and rotations;
- fencing, virtual fencing and stock control systems, *including how the virtual fencing is working for stock exclusion*;
- maintenance works:
- waterway, soil, vegetation and *environmentally* sensitive-area protection;
- review of performance against the previous plan, *in particular any licence breaches*;
- staged changes to grazing if needed to implement Toitū Te Whenua.

The Licensee must not materially depart from the approved plan without *prior* written approval.

Termination

The Licensor may terminate:

- for convenience with at least six months' written notice;
- for cause if the Licensee breaches the licence and fails to remedy the breach *as soon as practicable and in a way that minimises adverse effects of the breach*;
- immediately if the Licensee becomes insolvent, bankrupt, enters liquidation, receivership, administration, statutory management, or similar;
- in part, to reduce the Licensed Area.

5.6 Grazing and recreation under the Reserves Act 1977

5.6.1 Summary of submissions

Farming vs Grazing

230. Forest and Bird, FoMR and Pene Burton Bell refer to Section 74 of the Reserves Act, which states that a licence for grazing can be granted in recreation reserves where deemed desirable or necessary. They raise concerns that what is proposed under the licence is farming rather than grazing, and therefore unlawful under Section 74 of the Reserves Act.

231. FoMR and Pene Burton Bell's reason for this view is based on observations that previous grazing licences at BRP have operated as farming instead of grazing.

232. Forest and Bird justify their view that the proposed grazing licence constitutes farming by referring to Beef and Lamb's classification of a North Island hill-country farm, as applying 6-10 stock per hectare²⁶. Forest and Bird consider that because the proposed stocking rate of 6.8 stock per hectare sits within this range it should therefore be considered commercial farming and not grazing.

Purpose of recreation reserves

233. Pene Burton Bell and FoMR submit that under the Reserves Act any grazing must not be a primary or preferred use, and that it must protect the natural and scientific features of the reserve and avoid damage to indigenous fauna and flora.

234. Grenville Gaskell and Trish Heath refer to Section 17(1) of the Reserves Act, and specifically highlight the emphasis on, "...the retention of open spaces and on outdoor recreational

²⁶ [Farm classes | Beef + Lamb New Zealand](#)

activities”. They submit that strategies to convert the park to native vegetation should demonstrate how open space and recreation values will be maintained and balanced with restoration. In their view this also includes open hilltops and vistas as a key amenity value of BRP.

Maintaining public access and safety

235. Several submitters make general submissions about public access and recreational values which are relevant to the purpose of a recreation reserve under the Reserves Act.

236. FoBRP submit that maintaining recreational access is key.

237. Robyn Smith submits that it is important to keep recreational use of the park by keeping tracks open and maintained.

238. Cora McCauley submits that grazing should not restrict access and movement of recreational users such as bikers, walkers and horse riders outside of calving season.

239. Pareraho Forest Trust are concerned that under previous grazing licences public access was precluded and did not support the recreation values of grazed areas or of the intact Key Native Ecosystems downstream.

240. Paul Robinson and Preserve Belmont Farm raise the potential safety implications of unexploded munitions and their potential interaction with wildfires and seek confirmation from the Council and the New Zealand Defence Force that all unexploded ordnance or military material has been removed.

Recreational values of grazing or retirement

241. Paul Robinson and Paul Nation support grazing as a land management tool to give park users the ability to enjoy open natural areas and landscapes that many park users value. They note that grazing maintains visibility and access along tracks and across open areas.

242. Paul Robinson submits that grazing adds to the park’s rural character, providing an increasingly rare experience in Wellington and the Hutt Valley.

243. Similarly, Cora McCauley submits that grazing is a beneficial activity because it supports connection between the public and where their food comes from, which is particularly valuable in an urban context.

244. Preserve Belmont Farm Park considers that grazing is an effective management tool that helps maintain the park’s open landscape and supports recreation, which delivers benefits for park users. They submit that grazing has formed an important part of BRP for many decades.

245. Peter Law submits that without grazing, land that is not being actively planted will revert to rank grass, scrub, weeds and gorse, which will ruin affected parts of the park for recreational users, particularly Porirua users.

246. Grenville Gaskell and Trish Heath seek that some open areas are maintained to protect heritage features, open hill tops and vistas, and that grazing is an effective way to manage

open areas. They seek that a balanced approach is taken to restoration and preservation of amenity values.

247. On the other hand, Stephanie Gregor submits that the managed retirement of farming land (decrease in grazing areas) will allow for safer access to the park for the community.

248. Russell Bell submits that the proposed grazing licence does not demonstrate significant recreation benefits. They consider that the 73% of groups and people consulted on the development of Toitū Te Whenua saw either recreation, conservation or community benefits in phasing out grazing.

249. Hikoiki are of the view that any farm park values will be maintained through Battle Hill Park and will continue to provide the wider community with the opportunity to engage with a farm park within the region. They also submit that the opportunities for recreation, conservation, and community engagement that are enhanced through the retirement of grazing strongly align with the aspirations of mana whenua.

250. Ngā Kaitāroa ki Pito One submit that the recreational value gained from excluding Te Pito block from the grazing licence is evidenced through the recreational use of surrounding retired blocks. They consider that there is demonstrably *not* significant recreation (conservation or community) value continuing grazing in the Te Pito One block.

5.6.2 Analysis of submissions

Farming vs. grazing

251. The terms farming and grazing are not defined in the Reserves Act. We are not aware of any case law on the distinction between farming and grazing. However, section 217B of the Resource Management Act 1991 does include a definition of ‘farm’ as follows:

farm means a farm where all or part of the farm is—

(a) arable land use; or

(b) horticultural land use; or

(c) pastoral land use; or

(d) other agricultural land use prescribed in regulations made under [section 217M\(1\)\(b\)](#);
or

(e) any combination of the above.

252. The term ‘pastoral land use’ is also defined as, “*the use of land for the grazing of livestock*”. We consider that these definitions reflect common usage.

253. We acknowledge that the Reserves Act refers to each of these terms distinctly, for example Section 53, 54 and 72 all refer to farming or grazing in recreation reserves. However, given the available definitions we consider that grazing is a ‘subset’ of farming.

254. In other words, there is some overlap between the meanings of farming and grazing, because grazing refers to the consumption of grass which can occur on a farm. We also consider that grazing licenses can (and usually do) authorise more than the ‘consumption of grass’. Specifically, they can authorise other activities that are related to the ‘consumption of

grass’, such as fencing and weed control. However, we generally agree with submitters that farming covers a broader range of activities than grazing.

255. In our view, the question raised by submitters is whether the proposed license would authorize activities that are not related to the ‘consumption of grass’, for example the application of fertiliser or cropping. We have reviewed the grazing licence template of the Department of Conservation (DOC) who administer the Reserves Act²⁷. Schedule 3 lists the activities that (DOC) allow to occur through grazing licences and include farm vehicles, crops, fertiliser, weed control, and fencing. This demonstrates that DOC are comfortable that these activities form part of grazing, and we do not consider the BRP licence proposed grazing licence includes any activities outside of those listed in Schedule 3.

256. While we agree with Forest and Bird that the stock density of 6.8 stock per ha is within the range provided by Beef and Lamb to classify a North Island hard hill country farm²⁸, we do not agree that this means it is not grazing.

257. The concerns raised by submitters relate to the question of whether the stocking rate is too high to allow for potential impacts of grazing to be mitigated appropriately. We have addressed the question of stock density in Section 5.4.

Purpose of a recreation reserve

258. The purpose of a recreation reserve is outlined in Section 17 of the Reserves Act as:

“...providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside.”

259. Section 17(2) goes on to outline that they should be administered, to the extent possible, to:

- maintain public access,
- protect and maintain scenic, historic, archaeological, biological, geological, or other scientific features or indigenous flora or fauna or wildlife,
- conserve the qualities of the reserve which contribute to the pleasantness, harmony, and cohesion of the natural environment, and
- maintain the reserve’s value as a soil, water, and forest conservation area.

260. In response to Pene Burton Bell and FoMR, we are of the view that grazing is not the primary or preferred use of BRP. The proposed licence is for 735 hectares compared to a total park area of 3292 hectares, which means that grazing would represent around 22% of the park’s overall land use. This proportion would also be less once the effective grazing area is confirmed. Given that public access would be maximised in grazing areas, grazing would not be the ‘primary’ use in most areas of the park as they will also be used for recreation. Using stock to graze fire breaks will also fulfil a fire risk management function. The direction

²⁷ [Grazing Licence](#)

²⁸ [Farm classes | Beef + Lamb New Zealand](#)

provided by the BRP Long Term Restoration Strategy and Toitū Te Whenua also clearly indicate that grazing is not the ‘preferred’ use, with the intention to phase it out over time.

261. In response to Grenville Gaskell and Trish Heath, we note that the BRP Long Term Restoration Strategy specifically notes that the open ridge tops will continue to be grazed to provide a significant fire break and maintain an open area for recreation²⁹. Further consideration of how open areas are provided for through progressive restoration will occur through the BRP master planning process.

262. In response to Paul Robinson and Preserve Belmont Farm we acknowledge their concerns raised with regard to the interaction between grazing and munition, and its potential impact on the safety of park users (as it applies within the Licenced Area). While outside of our expertise, we are of the view that no activities proposed through the grazing licence increase this risk. We suggest that this issue is further investigated through master planning.

263. We acknowledge Paul Robinson and Cora McCauley’s submissions in support of the rural character/connection that grazing provides park users. Under Toitū Te Whenua Battle Hill is identified as the only farm park in the regional park network – this provides opportunities for visitors to engage with a farm park. This is consistent with Hikoikoi’s submission that any farm park values will be maintained through Battle Hill Park.

264. In Section 5.4, we respond to Ngā Kaitāroa ki Pito One’s concerns about the environmental impact of including the Te Pito block in the grazing licence. We acknowledge the submitter’s position that there is greater recreational value to be gained from the retirement of Te Pito One. We understand that parts of the Te Pito block will be excluded from grazing through the stock exclusion criteria, and that this area will continue to provide recreational benefits. However, the block is proposed to be included in the licence area because of the need to graze the ridgelines as part of the park’s wildfire management plan and a desire to maintain open hill tops/vistas.

265. We note the concerns across the spectrum from submitters about the impact of grazing on public access and recreational values in the park. These range from support for grazing as it enables recreational use of the park, to opposition because of previous experiences of park users being precluded from areas because of grazing stock, and lower recreational benefits from grazed land compared to restored land.

266. We understand the proposed licence includes several measures to provide for public access, open space, and recreational use:

- Ability to completely exclude cattle from popular tracks or recreation nodes through virtual fencing.
- Public access is maintained to all parts of the licence area (excluding the dwelling) all year round because grazing will be limited to cattle and no breeding stock (no calving or lambing season closures).

²⁹ Paragraph 22 of the June 2025 report.

- Removal of redundant internal fences and gates over time to improve ease of access for park users.
- Virtual fencing provides greater flexibility with stock management to allow better opportunities for park events, organised recreation activities and normal daily use.
- The licensee is required through the proposed licence conditions to protect natural, scenic, historic, cultural, archaeological, biological, geological and scientific features; and keep the area tidy and free from rubbish, carcasses and stored materials.
- Stock can be used to graze open areas and fire breaks and to maintain open tracks, supporting park user recreation, safety and access.

267. Grazing with the proposed measures will maintain access to and recreational values from open hilltops, grass landscape and expansive views. This supports activities such as horse riding and orienteering to occur in these areas. Critically, the grazing licence will support a reduction in fire fuel load. This will support the park to remain open to all users for longer periods during summer when fire risk is higher, and it would be otherwise unsafe to open.

268. We note Russell Bell's submission that the proposed licence prioritises the recreational benefits derived by park users who support grazing over the recreational benefits that are achieved through the phasing out of grazing as determined through the development of Toitū Te Whenua. We consider that the proposed grazing licence incorporates several measures that support recreational use and maintains full public access to BRP. Importantly, we consider that the fire risk that might be present if fuel loads are not managed appropriately would have significant negative impacts on the recreational use and access of all park users.

5.6.3 Conclusions

269. It is our view that no amendments to the licence are necessary in response to these submissions. We have addressed the proposed stock densities further in Section 5.4.

5.7 Compliance with Toitū Te Whenua Parks Network Plan 2020-2030

5.7.1 Summary of submissions

Toitū Te Whenua

270. Forest and Bird, FoMR, Pene Burton Bell, Robyn Smith, Russell Bell, Merrin Pearce, Ngā Kaitākore ki Pito One, and Pareraho Forest Trust have raised concerns that the grazing licence as proposed does not comply with Toitū Te Whenua.

271. Forest and Bird state that because stock grazing is identified as a high impact activity under Toitū Te Whenua, grazing licences must comply with Policies 17P, 18P, 19P, and 20P, which they argue the proposed BRP grazing licence does not.

272. FoBRP supports the submissions of Pareraho Forest Trust, Forest and Bird and Ngā Kaitārora ki Pito One, so by extension also support this point.

273. Grenville Gaskell and Trish Heath, on the other hand, argue that Toitū Te Whenua is not an implementation plan and does not address financial resources or an approach to restoration. They highlight that the intention was for the master plan to guide this land use change with community input. They note that Toitū Te Whenua does enable a continuation of grazing where there are nett recreation, conservation or community benefits, and that Council has previously identified grazing as the most effective strategy for managing open spaces.

274. Hikoikoi submit that seek that any interim or transitional land use decisions support, rather than compromise, the long-term vision for the park and the partnership commitments that underpin Toitū Te Whenua. The direction in Toitū Te Whenua represent aspirations agreed to by mana whenua and are therefore partnership commitments made by Greater Wellington.

275. The details of submitter analysis on particular Toitū Te Whenua policies is discussed for each policy in Section 5.7.2.

Adequacy of the AEE

276. Submitters have also raised concerns about the level of information and analysis provided in the AEE, which is required by Toitū Te Whenua policies, being insufficient to justify the grazing licence.

277. Ngā Kaitārore ki Pito One are concerned that the AEE report appears to be a desktop assessment with no assessment of the types of terrain in the different blocks in the grazing licence. They submit that there is a lack of monitoring data or modelling to back assertions in the AEE that the proposed licence complies with Toitū Te Whenua.

278. Pene Burton Bell and Russell Bell consider that the AEE fails to meet the required standard. Specifically, Pene Burton Bell submits that it does not provide guidance on how elimination, minimisation, and then mitigation of negative environmental effects will be managed, audited and enforced under the licence.

279. Forest and Bird and Russell Bell submit that the AEE is misleading in its assertion that 300 hectares will be retired from 2026-2030, when in fact this retirement of 300 hectares has already occurred.

280. Forest and Bird submit that the AEE does not provide any mapping of sensitive areas, nor any analysis of how much land will be retired to protect headwaters, significant wetlands and erosion prone hills. They seek that the AEE is redone in a more thorough way, and includes ecological mapping and a values assessment.

5.7.2 Analysis of submissions

Adequacy of the AEE

281. We note submitter's concerns that the AEE report is insufficient.

282. *Appendix Two: Manaaki paka/caring for parks AEE guide*³⁰ of Toitū Te Whenua sets out the standard requirements of and the matters that must be addressed in the AEE.

283. We acknowledge Ngā Kaitiārore ki Pito One concerns that the AEE appears to be a desktop assessment without sufficient monitoring data or modelling to back assertions. Section 8 of Appendix Two of Toitū Te Whenua sets out what supporting information or reports may be required for an AEE but does not specify that the AEE must provide this information. We also note the concern from Forest and Bird that the AEE has not provided any mapping of sensitive areas, nor any analysis of how much land will be retired to protect this.

284. We requested mapping of stock exclusion areas as well as the criteria of what constitutes environmentally sensitive areas from the Applicant, which we discuss further in Section 5.4.2.

285. This criteria has informed an initial mapping exercise of stock exclusion areas. However, while this map may indicate where environmentally sensitive areas are it is not particularly helpful until it has been ground-truthed. We understand that there is significant resourcing involved in ground-truthing the environmentally sensitive areas across a large area.

286. To ensure efficient use of resourcing the Applicant intends to undertake a thorough mapping and ground-truthing exercise if the licence is granted, prior to stock arriving. This will also determine the final effective grazing area which is not currently known. The Applicant's reasoning for not doing it at this stage is reasonable in our view, and we recognise the need for some level of flexibility to allow for site-specific stock management to suit particular constraints.

287. In lieu of mapping, the criteria of environmentally sensitive areas provided by the Applicant provides an indication of what will be identified for exclusion from grazing. To further specify the extent of stock exclusion and thereby support the AEE, we request that the Applicant provides further information on:

- The definitions and methodologies that will be used to identify wetlands, seeps, erosion-prone areas etc if available,
- Who will undertake the mapping and ground-truthing of environmentally sensitive areas and their expertise,
- How the map of the effective grazing area will be confirmed or checked following ground-truthing to ensure its robustness.

288. In response to Pene Burton Bell's submission, under Appendix Two of Toitū Te Whenua the AEE is required to identify ways that adverse effects across key values of the park will be avoided, minimised or remedied. The AEE has set out how adverse effects will in the first instance be avoided through stock exclusion; and then minimised through low stocking rates in areas that are grazed. The AEE emphasises the use of an adaptive management approach to respond to adverse effects that may occur despite the measures taken to first

³⁰ Toitū Te Whenua Parks Network Plan 2020-30 Pages 211-212

avoid and then minimise these effects³¹. Therefore, in response to the concerns raised by Pene Burton Bell, in our view the AEE has met the standard in relation to the direction to avoid, minimise or remedy adverse effects in Appendix two of Toitū Te Whenua.

289. We refer to our analysis in paragraphs 220-225 on breaches and monitoring. We understand that the Applicant intends to provide more information on how good management practices will be directed, audited and enforced through the licence.

290. We note the concern from Forest and Bird and Russell Bell that the statement in the AEE that “approximately 300 hectares of the current grazing area is scheduled to be retired from grazing between 2026 and 2030” is misleading. We agree that this could be misinterpreted to mean that the grazing licence area of 735 hectares will be reduced by 300 hectares over the four-year licence term.

291. We understand that the approximately 300 hectares of retired land refers to the reduction in grazing area between the previous grazing licence (1035ha) and the proposed grazing licence (735ha). This reduction is still relevant to note in the AEE given it is the reason for the proposed extent of grazing, and it demonstrates alignment with the direction to progressively retire phase out grazing from BRP in Toitū Te Whenua.

292. The sufficiency of the AEE as it relates to its assessment of particular policies as raised in submissions is addressed below.

Compliance with Toitū Te Whenua

293. Toitū Te Whenua Parks Network Plan 2020-30 is the operative reserve management plan for the Council’s parks. As set out in the statutory context of this report, Toitū Te Whenua manages what activities can be undertaken in BRP and the requirements they must meet. Stock grazing is a restricted activity and therefore must be assessed on a case-by-case basis against the Plan’s Policies and Rules³².

294. Because several submitters have raised concerns regarding the inconsistency of the proposed grazing licence with Toitū Te Whenua, the following analysis will do two things:

- Respond to specific submissions on individual Toitū Te Whenua policies; and
- Consider generally the consistency of the proposed grazing licence against the relevant Policies and Rules in the Plan to support the planning assessment of the proposed grazing licence in Section 6.0 of this report.

295. We note that the matters raised by submitters are only in scope as they relate to the Licenced Area of 735 hectares, and submissions relating to restoration are only in scope for the areas within the Licenced Area which will be excluded from grazing.

Policy 1P – Protect, restore and/or maintain healthy ecosystems across parks for ecosystem service benefits taking a landscape, catchment-wide approach encompassing:

- *Mana whenua values, mātauranga Māori knowledge and kaitiakitanga priorities*

³¹ Paragraphs 3.3 and 6.3 of the Assessment of Environmental Effects

³² Toitū Te Whenua Parks Network Plan 2020-30 Pages 216-220

- *Innovation in restoration and eco-sourcing of seeds for restoration activities wherever possible*
- *Greater Wellington and other biosecurity programmes*
- *Engagement with stakeholders and the wider community*

296. Robyn Smith submits that continuing grazing is contrary to Policy 1P as healthy ecosystems are not farmed ecosystems.

297. We acknowledge Robyn Smith's submission, however in our view the proposed grazing licence is a necessary part of a wider strategy to restore BRP through the gradual retirement and restoration of previously grazed land to achieve healthy ecosystems. The Applicant has proposed a number of measures to manage the impact of grazing on the park's ecosystems which are discussed in the earlier parts of the report, so we are satisfied that environmentally sensitive areas requiring protection will not be grazed.

298. Russell Bell submits that Policy 1P is not met because the stock exclusions do not apply to wetlands, setbacks are determined by the grazier, and the proposed licence does not support restoration because all the land is allocated to grazing.

299. In response to Russell Bell's submission we refer to paragraph 158, which set out the criteria for stock exclusion which is inclusive of wetlands, paragraphs 187-191 which discuss the minimum setback from environmentally sensitive areas, and paragraphs 173-176 which provide clarification on how stock density will operate in practice. Based on this information we consider that the concerns raised by the submitter in relation to Policy 1P are resolved.

Policy 4P – To utilise environmental science knowledge in the restoration of natural heritage. Restoration opportunities are identified strategically, prioritising:

- a. Benefits to overall natural heritage and the reduction of threats and impacts*
- b. Contribution to biodiversity, freshwater quality and Greater Wellington's carbon neutrality targets*
- c. Mana whenua values and kaitiakitanga priorities including sustainable customary use and mahinga kai*
- d. Areas previously grazed by stock for restoration and erosion prone land*
- e. Threatened forest ecosystems and ecological corridor opportunities within and beyond park boundaries*
- f. Community-lead and resourced initiatives where appropriate*

300. Russell Bell submits that the proposed grazing licence is prioritising a grazing contract not restoration and therefore Policy 4P is not met. They submit that the grazing licence will curtail almost all restoration opportunities including previously grazed land and erosion prone areas for 4 years until the grazing licence expires, by which time Toitū Te Whenua will have expired.

301. We interpret Policy 4P as providing direction on the strategic prioritisation of restoration opportunities as not all areas can be restored simultaneously. Areas to prioritise include those previously grazed by stock as directed by Policy 4P. The BRP master planning process which is currently underway will include a spatial mapping exercise to strategically identify areas included in the proposed licence to prioritise for future restoration.

302. We disagree with the submitter that the licence will curtail almost all restoration opportunities on previously grazed land and erosion prone areas. The proposed licence includes a mechanism through the Annual Operations Plan to potentially retire land during the lifetime of the licence, which may then become available for restoration. Additionally, areas within the Licenced Area which would be excluded from grazing would be able to be restored, which could be 100-150 hectares.

Policy 5P – To demonstrate highly sustainable practice in land management following Greater Wellington and territorial authority policies and rules, including District Plans, Greater Wellington Proposed Natural Resources Plan, Regional Pest Management Plan, Biodiversity Strategy and other relevant plans and strategies are complied with and exceeded wherever possible. This includes vegetation clearance, earthworks, discharges and nutrient impacts to land and water, works in and around waterbodies and wetlands and activities in the coastal environment.

303. Robyn Smith submits that grazing is not a sustainable land management practice.

304. Russell Bell submits that the AEE has not demonstrated that sustainable land management will be achieved by the proposed grazing licence. The submitter specifically notes that there is no assessment of soil health, clean water nor biodiversity after 4 years of grazing at 6.8 SU/ha on already degraded land.

305. In response to Robyn Smith, our understanding of sustainable land management is the management of land in a way that balances economic, social, and environmental considerations to sustain the productive capacity of land while protecting and improving the natural environment. From the information available to us, we consider that grazing is a necessary aspect of the sustainable management of BRP at this stage, and that it is a valuable interim tool to support the wider restoration of BRP. This reasoning is laid out in the BRP Long Term Restoration Strategy³³.

306. In response to Russell Bell, we refer to our analysis of the stock management practices and mitigation of environmental effects in Sections 5.4 and 5.5. We consider that if implemented as proposed, the combination of 5 metre setbacks around environmentally sensitive areas (as classified by the Applicant) and best management practices of stock, should minimise any adverse environmental effects of grazing on the health of soil, water and biodiversity.

307. The proposed grazing licence is part of the wider BRP Long-Term Restoration Strategy, which supports the phasing out of grazing and restoration of previously grazed areas over time.

Policy 6P – To protect and restore soil health and minimise impacts on wetland soil types:

- a. Using appropriate methods to minimise erosion*
- b. Undertaking soil quality restoration activities such as indigenous vegetation restoration*
- c. Restoring peat formation processes*
- d. Through Assessment of Environmental Effects (AEE) process, allowing beneficial and minimal impact land uses*

³³ Paragraphs 18-22 of the June 2025 report.

308. Robyn Smith submits that grazing encourages slips, stream bank erosion, and sedimentation of freshwater.

309. Russell Bell submits that the proposed stocking will reduce soil health and increase erosion.

310. We acknowledge that grazing can cause soil disturbance and a loss of vegetation cover which can lead to erosion and sediment runoff. The Applicant will avoid and minimise these effects through virtual fencing which will exclude cattle from erosion-prone land (which is one type of 'environmentally sensitive area'), and at a setback no less than five metres from waterbodies and other environmentally sensitive areas. Additionally, the use of lighter classes of cattle should minimise soil disturbance.

311. In response to Russell Bell, we have clarified the function of the stocking rate in Section 5.4 of this report. We consider that the proposed licence has measures in place to exclude stock from erosion prone land and avoid potential impacts of over-grazing on soil health.

Policy 7P - To protect and promote the health and extent of all indigenous flora, prioritising pest animal reduction, working collaboratively with others

312. Robyn Smith submits that it is essential to encourage and support pest animal reduction in the park to protect native fauna from predation and to protect early stages of seedling growth.

313. The Applicant has confirmed that pest control within the Licenced Area will be the responsibility of the Council. We consider that the proposed licence has measures in place to protect the health and extent of indigenous flora within the Licenced Area.

314. We also note that the use of the proposed licence supports the strategic use of available resourcing to support successful restoration outcomes, acknowledging the need for ongoing pest and weed control in restoring areas.

Policy 11P – To support a precautionary approach to minimising impacts on natural, cultural, landscape and recreation values, also considering possible benefits, by incorporating the Assessment of Environmental Effects (AEE) into decision making processes (Refer AEE Guide, Appendix 2.)

315. Forest and Bird are of the view that the proposed grazing licence does not adequately demonstrate compliance with Policy 11P, because the AEE contains insufficient information on effects and how they will be managed. They consider that a precautionary approach, as required by Policy 11P, would involve determining the stock units based on how impacts on natural, cultural, landscape and recreation values would be minimised, and consider that 5000 stock units does not achieve this. In particular they raise the lack of:

- Assessment of park-wide ecological values
- Analysis of freshwater values
- Assessment of cumulative impacts over the licence period, and

- Evidence that alternative, lower-intensity grazing regimes were considered.

316. Russell Bell submits that the AEE failed to take a precautionary approach to assessing the proposed licence.

317. As we discuss in Section 5.4, the Applicant has advised us that they have revised their approach to stocking density. The stocking rate will always be set at the minimum necessary to manage vegetation growth, and actively managed to mitigate adverse effects on natural, cultural and recreational values. The Applicant intends to further detail their approach in their report.

318. It is our view that the applicant has demonstrated that grazing is necessary in the park as an interim land management tool to protect natural, cultural, landscape and recreation values (see for example its analysis in paragraphs 18-22 of the June 2025 report). We consider that a grazing approach which stocks the minimum amount of cattle to achieve the land management outcomes in addition to the stock exclusion measures is consistent with a precautionary approach.

319. In response to the further information requested by Forest and Bird, park-wide ecological values will be assessed through the BRP master plan. Ecological (including freshwater) values within the Licenced Area will be assessed in detail through the process of ground-truthing of environmentally sensitive areas which is planned after the granting of the licence (if granted), as discussed in Section 5.4. In relation to cumulative effects over the licence period, the good management practices guidance, which the licensee will need to follow, should minimise cumulative effects of grazing. In relation to the consideration of lower-intensity grazing, under Section 5.4 we have asked the Applicant to provide more information on the proposed average stock density of 7 SU/ha. In general it is our understanding that the Applicant intends to apply a low-intensity grazing regime.

Policy 12P – To apply the management effects hierarchy prioritising the avoidance of impacts, then minimising, then remedying informed by an AEE

320. Russell Bell submits that the proposed licence has not applied the effects management hierarchy. They submit that there are no avoidance considerations, one minimisation consideration and one remedy consideration. In their view an avoidance approach would deploy the *lowest number of cattle over the smallest area for the least time* to achieve the land management results. They state that the assessment against 12P is inadequate.

321. Because BRP is classified as a recreation reserve we must consider impacts on all values relevant to a recreation reserve under the Reserves Act. As discussed under Policy 11P, 22P, 34P and 39P as well as in Section 5.6, we consider the Applicant has demonstrated that adverse effects on recreation and landscape values have been avoided, minimised and remedied, and provides benefits by retaining open areas and managing vegetation.

322. Impacts on natural environment values are the focus of the submitters' concerns. We agree that the exclusion of land from grazing is in the first instance, the most effective way to avoid impacts from grazing on natural environmental values. However, this must be considered and balanced with the other values of a recreation reserve. It is our view that the Applicant has demonstrated how effects of grazing on environmentally sensitive areas will be avoided

through stock exclusion. The proposed licence area is substantially reduced from the historic grazing area, thereby contributing to implementation of the BRP Long-term Restoration Strategy.

323. The AEE has not provided specific assessment on the inclusion of each block within the licensed area. We have requested more information from the Applicant on the inclusion of some blocks identified by submitters, and our analysis of this information is set out in section 5.4.

324. To support the AEE and assist with confirming compliance with this policy, we request that the Applicant provides further information on why the full extent of the grazing Licenced Area is necessary.

325. Following avoidance, the Applicant has demonstrated how effects on natural values will be minimised through cattle class selection and stocking rates. Importantly, we consider the approach to graze at the minimum density necessary to manage vegetation growth demonstrates steps to apply the effects management hierarchy and is consistent with the process sought by Russell Bell in their submission.

326. We consider that the other measures and good management practices proposed by the Applicant and the proposed adaptive management approach to remedying impacts comply with Policy 12P. The Applicant has advised that these measures will be, *“supported by ongoing monitoring and the Annual Operations Plan, allowing management to be adjusted over the term of the licence.”*

Policy 13P – Apply the AEE process to annual grazing licence plans.

327. The Applicant has prepared an AEE in accordance with Appendix 2: Manaaki paka/caring for parks AEE guide of the Toitū Te Whenua Parks Network Plan 2020-2030.

Policy 17P – To phase out livestock grazing (except Battle Hill) unless it can be demonstrated that there are significant net recreation, conservation or community benefits, with full public access maintained. Manage grazing licence activity practices to:

- a. Protect soil, water and remnant native vegetation through AEE process. Also refer 13P, 20P*
- b. Ensure full public access in grazing licence areas. Refer Rules.*

328. The proposed licence area's reduction from the previously grazed area, and inclusion of mechanisms for potential future reductions in the grazed area, form part of a long-term approach to progressive phasing out of grazing as guided by master planning. The wording of the policy does not specify a timeframe or rate for grazing to be phased out. Full public access has been maintained in the proposed grazing licence (as discussed in Section 5.6), and steps to protect soil, water remnant native vegetation have been taken (as discussed in Section 5.4).

329. In any event, grazing as an interim land management tool delivers greater recreation, conservation or community benefits than the option of not grazing at this stage. We understand there is a real fire risk if pasture in the park is not managed appropriately while

restoration efforts are undertaken, as is outlined in the BRP Long Term Restoration Strategy. This fire risk presents a threat to recreational, conservation, and community values.

330. We therefore think that the proposed grazing licence complies with Policy P17.

331. Forest and Bird are of the view that the proposed grazing licence does not comply with Policy 17P because;

- It does not support implementation of the BRP Long Term Restoration Strategy as phased removal of grazing is not specified through the AEE.
- Insufficient evidence is provided to demonstrate how soil, water and remnant native vegetation will be protected. The submitter seeks setbacks of at least 10 metres from waterbodies.

332. With respect to point one, we understand that the AEE states that the proposed grazing licence implements the BRP Long Term Restoration Strategy because this document provides the strategic direction for the phasing out of grazing in BRP as directed by Policy 17P. In Section 5.2, we discuss the proposed licence's consistency with the Restoration Strategy.

333. With respect to point two, the AEE sets out the measures that the proposed licence would apply to protect soil, water and remnant native vegetation. These are discussed in Section 5.4 of the report. We acknowledge the concerns from Forest and Bird that there is insufficient evidence to support the conclusion that these measures will achieve these outcomes. The Applicant has provided information on the management of environmental effects to inform this report (Appendix 4). In addition to our requests for further information in Section 7.0 of this report, we consider that the combination of this information will support the AEE's conclusions. We have asked the Applicant to comment on setbacks in particular.

334. Russell Bell submits that significant recreation, conservation or community benefits have not been demonstrated;

- The proposed grazing licence ignores the recreational, conservation or community benefits from those who supported the phasing out of grazing in Toitū Te Whenua.
- The proposed grazing licence provides no conservation gains because of the proposed stocking rate (5000su and 6.8 SU/ha).
- Community benefits must include the greenhouse gas emissions impacts of retirement and restoration.

335. With respect to point 1, we consider that this proposed grazing licence forms part of the long-term approach to phasing out grazing at BRP.

336. With respect to point 2, we have clarified that the stock density will vary and be maintained at the minimum necessary to manage vegetation growth. The stocking rate will not affect whether land can be retired in the future.

337. With respect to point 3, we acknowledge the submitter's concerns that the proposed grazing licence has not taken into account the community benefits from the licence's impact on

greenhouse gas emissions. On balance, we do not think this changes the benefits of grazing in as an interim land management tool.

338. Hikoikoi submit that the policy framework of Toitu Te Whenua, including Policy P17, establishes grazing as an activity that is subordinate to recreation, restoration, conservation, freshwater health and community outcomes. They submit that the phased retirement of grazing is foundational to BRP's future direction, but that they acknowledge the use of grazing as a land management tool during the restoration of BRP. Hikoikoi also refer to Action A200 to "*accelerating destocking of grazing areas of the park*".

339. Robyn Smith submits that livestock has already been reduced in the park and should now be stopped.

340. We note the submissions of Robyn Smith and Hikoikoi. We consider that the Applicant has demonstrated that some grazing in the park is necessary as an interim land management tool, while BRP master planning occurs in partnership with mana whenua and with community input. There are pathways for potential future reductions in grazing. In our view this approach appropriately balances the values supported by a recreational reserve.

341. Grenville Gaskell and Trish Heath submit that Policy 17P supports grazing where it can be demonstrated that there are significant nett recreation, conservation or community benefits. We note this submission.

Policy 19P - To prohibit agricultural grazing related operational activities deemed (through annual grazing licence plan AEE assessment) to be high impact or in sensitive sites

342. Forest and Bird submit that the proposed grazing licence has not been assessed against Policy 19P. They submit that the AEE should have identified what is considered a high impact operational activity under Policy 19P, and how their impacts will be managed.

343. We agree with the submitter that the AEE should have assessed the proposed grazing licence against Policy 19P. We have therefore included it in this assessment.

344. The original Expression of Interest for the grazing licence identified high impact agricultural grazing related operational activities as "*lambling, calving, spraying of gorse for pasture growth and application of fertiliser*"³⁴. We acknowledge that this is not an exclusive list, however in our view the Applicant has identified these as high impact activities relevant to the proposed licence. The proposed licence conditions, as amended by our recommendations, do not allow any of the operational activities listed above, so we consider they have been prohibited. As stated previously, environmentally sensitive areas will be mapped through detailed ground truthing and excluded from grazing.

Policy 20P - To avoid and reduce farming infrastructure investment (except Battle Hill) unless there are direct benefits for conservation, recreation or community activities:

- *Avoid any additional investment in stock fences, shelter, or stock water facilities and services*

³⁴ [Belmont-Regional-Park-Expression-of-Interest-for-new-grazing-activities-.pdf](#)

- *Progressively remove fences not required for recreation or conservation purposes*
- *Minimise impacts during phasing out of grazing licences (Also refer 17P)*
- *Adaptively reuse and recycle farming related infrastructure for conservation, recreation and community purposes*

345. The AEE assessment against this policy states that the use of virtual fencing will reduce the need for new physical fencing, and allow old infrastructure to be removed over time.

346. We consider that the opportunity provided by virtual fencing to manage the environmental and recreational effects of grazing and avoid additional farming infrastructure is significant. We are comfortable that the licence conditions, as amended by our recommendations, provide for annual reviews of the system's performance and opportunity to adapt to breaches.

347. The AEE notes that stock will be provided water troughs or alternative stock watering systems to eliminate the need for stock to have access to surface water for drinking. This is intended to avoid adverse effects of stock accessing waterways. Although the additional investment in stock water facilities does not comply with Policy 20P direction, it appears to be a necessary trade off to achieve the direction in other Toitū Te Whenua policies. The proposed licence is not viable if stock do not have access to drinking water. Therefore, the *benefits for conservation, recreation or community activities* would not be realised without the reticulated stock water.

348. We have invited the applicant to provide further information in its report on the provision of reticulated stock water in Te Pito block given that this has been raised by submitters. We consider this matter is relevant to supporting the exclusion of stock from waterways.

Policy 22P - To maintain and prioritise public access for recreation and conservation activity use in parks unless:

- *There are significant health and safety hazards which cannot be minimised or managed*
- *The activity is managed via a concession or lease agreement which limits general public access*
- *Restricting access is an obligation under a specific Act, such as the Biosecurity Act 1993, Fire and Emergency New Zealand Act 2017 or the Public Health Act 1956.*
- *Continued access to an area of a park poses a threat to indigenous biodiversity, ecosystem services or cultural heritage*

349. There are no submissions on Policy 22P specifically.

350. The licence conditions stipulate that public access is maintained to all parts of the licence area (excluding the dwelling). This will occur all year round because grazing will be limited to cattle and no breeding stock (no calving or lambing season closures).

Policy 34P - To provide multi-use shared facilities wherever practicable that foster friendly sharing behaviour to minimise visitor conflicts.

351. There are no submissions on Policy 34P specifically.

352. We consider that the proposed licence includes measures to minimise visitor conflict through the exclusion of stock from popular tracks or recreation nodes and areas being used for events. This is supported by not using breeding stock which would result in closures for calving season.

Policy 39P - To provide opportunities for park visitors with dogs and horses in a manner that minimises impacts on natural, cultural and recreation values.

353. There are no submissions on Policy 39P specifically.

354. We support the Applicant's assessment of this policy in the AEE, that grazing with cattle only and no breeding stock supports greater dog access and continued horse-riding opportunities. Additionally, the proposed grazing licence supports the retention of open space which provides recreational opportunities for dog walkers and horse riders.

Policy 46P - To preserve and protect a diversity of landscapes across Greater Wellington parks including dark skies and those identified as having significant natural or cultural (encompassing recreation) values. Refer Heritage and Landscapes of Significance Schedule Appendix 4.

355. There are no submissions on Policy 46P specifically.

356. We support the Applicant's assessment of this policy in the AEE. The proposed licenced includes several measures to avoid grazing where this will have an impact on areas with significant natural and cultural values. This will ensure these landscapes remain protected.

357. We understand that the park contains a range of important heritage features, including Heritage New Zealand listed Old Coach Road, former World War 2 ammunition storage facilities and magazines and several archaeological sites which all contribute to the culture and history of the site.

358. The AEE states that these sites will be protected through the use of virtual fencing, which will exclude stock without requiring additional physical fencing that may alter the landscape character and heritage features.

359. We have not been provided with a map of the important heritage features in the park which illustrates their exclusion, and the licence conditions do not currently specify how stock will be excluded from heritage sites. The licence conditions state, "*protect natural, scenic, historic, cultural, archaeological, biological, geological and scientific features*" which reflects the Reserves Act. It may vary how heritage and landscape sites are best protected and some may be suitable for some grazing to enable access and recreation, so we consider it appropriate for this wording to be retained.

360. To support the AEE, we request that the Applicant provides more information on how the heritage and landscape features identified in the Toitū Te Whenua *Heritage and Landscapes of Significance Schedule* will be mapped and protected from grazing if necessary, including how the virtual fencing will be used to achieve this.

Policy 83P - To prioritise restoration of natural heritage values particularly forests and peatland to increase natural carbon sinks

361. Russell Bell considers that Policy 83P provides direction to put the restoration of forests and wetlands first. In this context, they submit that the proposed licence fails to meet Policy 83P because it does not prioritise restoration of forests and wetlands.

362. The AEE states that “*wetlands, waterways and priority restoration areas will be progressively retired from grazing and planted or restored*”.

363. We make the additional observation that wetlands, waterways and native forest remnants are captured by the Applicant’s definition of environmentally sensitive areas which are subject to stock exclusion under the proposed licence.

364. The proposed licence forms part of the wider BRP Long Term Restoration Strategy to progressively retire and restore BRP. The proposed licence includes an approximately 300-hectare reduction from previously grazed land. It is our understanding the prioritisation of future areas to retire will be determined through the BRP master planning process.

Rules in Toitū Te Whenua

365. The following rules in Toitū Te Whenua also apply to stock grazing in BRP:

- Full public access must be maintained other than in equipment/agrichemical storage areas or short, temporary closures for public safety. Grazing licences must accommodate recreation activities (including dog walking). Also refer Dog Walking
- Small scale grazing for open space management, ridge top views or geological feature viewing is limited to low impact stock types and numbers, e.g. Boulder Hill, Belmont.
- Rights of licence renewal will not apply. Leases will not be issued.
- AEE processes and sustainability practices apply to all licences. Park fire management plans apply.

366. We consider that the proposed licence complies with the rules for stock grazing in BRP.

5.7.3 Conclusions

367. In response to submissions stating that the proposed licence does not comply with Toitū Te Whenua, based on the information provided to date, we have not identified any case of non-compliance with the applicable reserves management plan.

368. Several of the policies ‘pull in different directions’ however we consider the overall intent is met. For example, in order to support stock exclusion from environmentally sensitive areas to comply with some policies, investment in some new stock water infrastructure is required which is inconsistent with Policy 20P.

369. The following information would assist in confirming that the proposed grazing licence does comply with Toitū Te Whenua and to further support the AEE (some of these have been discussed in previous sections of this report):

- In the classification of environmentally sensitive areas, the definitions and methodologies that will be used to identify wetlands, seeps, erosion-prone areas etc. if available.
- Who will undertake the mapping and ground-truthing of environmentally sensitive areas and their expertise.
- How the map of the effective grazing area will be confirmed or checked following ground-truthing to ensure its robustness.
- More information about heritage and landscape features within the Licenced Area, and how they will be mapped and protected from grazing if necessary.
- Further information on why the full extent of the grazing Licenced Area is necessary; that is why grazing cannot be avoided in each of these areas.
- How and why the average annual stocking rate of 7 SU/ha is appropriate to support land management.
- How Good Management Practices will be applied to ensure stocking densities are always the minimum necessary for land management while being able to fluctuate.
- Further information on the suitability of a minimum 5 metre setback from environmentally sensitive areas, compared to a 10 metre setback.
- How monitoring and enforcement will be undertaken with the grazier through the Annual Operations Plan, and how licence breaches will be managed.

6.0 Planning Assessment

370. The statutory test for the granting of a grazing licence under the Reserves Act is set out in Section 2.0 of this report.

371. The administering body must be satisfied that the grazing licence is necessary or desirable for the management of the reserve for the purpose for which it is classified.

372. The purpose of a recreational reserve is to provide:

“areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside”.

373. We consider that the Applicant has demonstrated that the proposed grazing licence is necessary as an interim land management tool for BRP as it progressively transitions from grazing to restoration. The proposed licence will enable the management of vegetation and fire risk within the grazed licence area, while maintaining public recreation and access, and protecting the natural environment. Critically, the fire risk that might be present if fuel loads

are not managed appropriately could result in fires which would have significant negative impacts on the recreational use and natural environment in the park.

374. We asked the Applicant to comment on why they thought the proposed licence met the Reserves Act ‘test’, and they provided the following additional context that the licence allows for longer-term planning processes to run their course:

“[The proposed licence] provides time for current planning work to continue to identify areas for retirement and areas where grazing may continue as a land management tool, consistent with the longer-term direction in Toitū Te Whenua.”

375. We consider that using the proposed licence as an interim measure alongside longer term implementation of Toitū Te Whenua direction is consistent with the Reserves Act.

376. In addition to the meeting the test under the Reserves Act, the proposed grazing licence must also comply with the relevant Reserve Management Plan (Toitū Te Whenua).

377. Through this hearing report in response to submissions we have recommended changes to the draft conditions for the proposed grazing licence.

378. We have assessed the proposed licence against the relevant policies and rules in Toitū Te Whenua (Section 5.7). We consider that the proposed licence will comply with Toitū Te Whenua inclusive of our recommended changes to the conditions and subject to receiving the requested further information from the applicant.

7.0 Recommendations

379. Having given consideration to all objections and submissions, it is our view that the licence can be granted subject to some amendments to the proposed licence conditions to improve clarity and certainty and address concerns raised by submitters.

380. We recommend changes to the licence conditions which we have discussed throughout our analysis. The licence terms and conditions including our recommended changes are included in Appendix 2 to this report.

381. In our view the following information would assist in confirming that the proposed grazing licence complies with Toitū Te Whenua and to further support the AEE (some of these have been discussed in previous sections of this report):

- In the classification of environmentally sensitive areas, the definitions and methodologies that will be used to identify wetlands, seeps, erosion-prone areas etc. if available (discussed in Section 5.7).
- Who will undertake the mapping and ground-truthing of environmentally sensitive areas and their expertise (discussed in Section 5.7).
- How the map of the effective grazing area will be confirmed or checked following ground-truthing to ensure its robustness (discussed in Section 5.7).

- More information about heritage and landscape features within the Licenced Area, and how they will be mapped and protected from grazing if necessary (discussed in Section 5.7).
- Further information on why the full extent of the proposed Licenced Area is necessary (discussed in Section 5.7).
- How and why the average annual stocking rate of 7 SU/ha is appropriate to support land management (discussed in Section 5.4).
- How Good Management Practices will be applied to ensure stocking densities are always the minimum necessary for land management while being able to fluctuate (discussed in Section 5.4).
- Further information on the suitability of a minimum 5 metre setback from sensitive areas, compared to a 10-metre setback (discussed in Section 5.4).
- How monitoring and enforcement will be undertaken with the grazier through the Annual Operations Plan, and how licence breaches will be managed (discussed in Section 5.5).

382. We consider it would be helpful if the Applicant also provides the stock densities under previous grazing licences (discussed in Section 5.4).

Appendix 1: Proposed draft Belmont Regional Park grazing licence terms and conditions

Note – the below proposed licence terms and conditions do not include administrative conditions which are not relevant to the grazing effects management considered in this Hearing report. Conditions not included below relate to the licence fees, the dwelling (which is subject to a separate concession), insurance, liability, and health and safety.

Parties

- Licensors: Wellington Regional Council.
- Licensee: Name still to be confirmed.

Land and Licensed Area

- The land is within Belmont Regional Park, including the Waitangirua, Takapu and Kilmister Blocks.
- The licensed area is approximately 735 hectares, including the dwelling, but excluding areas marked as excluded on the plan in Attachment One [to the final licence conditions, map not yet developed].

Purpose of the Licence

- The licence allows the Licensee to use the Licensed Area for grazing stock only.
- The licence is intended to support interim land management while progressing the long-term direction in Toitū Te Whenua Parks Network Plan 2020–2030, including progressive reduction of grazing over time.

Permitted Use

- An average annual grazing rate of up to 7 SU/ha stock units, subject to review through the Annual Operations Plan process.

Term

- The term is four years.
- The commencement date is [insert date].
- There is no expectation or entitlement to renewal or extension.

Licensee Obligations

The Licensee must:

- use the Licensed Area only for grazing;
- manage and maintain the Licensed Area in accordance with the Good Management Practices set out in the Grazing Licence Practice Guide;
- maintain fencing, stock-control systems and other improvements;
- ensure virtual fencing and electronic stock control systems are properly installed and operated;
- exclude stock from waterways, drains, wetlands and sensitive areas unless approved;
- protect natural, scenic, historic, cultural, archaeological, biological, geological and scientific features;
- keep the area tidy and free from rubbish, carcasses and stored materials;
- manage biosecurity risks;
- repair damage caused by stock or the Licensee's activities;

- comply with laws, bylaws, consents and permits;
- occupy and use the area at the Licensee's own risk.

Licensor Obligations

- If the Licensee pays the fee and complies with the licence, the Licensor must allow the Licensee to use the Licensed Area during the term without interruption.

Public Recreation and Access

- The Licensee acknowledges the public has access to all of the Licensed area for recreation.
- The Licensee must not obstruct or interfere with public access unless approved by the Licensor.
- Temporary restrictions may only be implemented where necessary for public safety, animal welfare or safe grazing operations, and only with Licensor approval except for immediate temporary risk-management steps.
- The Licensee must comply with directions about access, signage and communications.

Buildings, Structures and Alterations

- The Licensee must not erect, place or permit any building, structure, shelter, yard, pen, hardstand or other permanent or temporary structure without the Licensor's prior written consent.
- Consent may be withheld at the Licensor's absolute discretion.

Annual Operations Plan

The Licensee must prepare and submit an Annual Operations Plan:

- before commencement; and
- by 30 June each subsequent year, or another date required by the Licensor.

The plan must cover:

- stock numbers, type, stocking rates and rotations;
- fencing, virtual fencing and stock control systems;
- maintenance works:
- waterway, soil, vegetation and sensitive-area protection;
- review of performance against the previous plan;
- staged changes to grazing if needed to implement Toitū Te Whenua.

The Licensee must not materially depart from the approved plan without written approval.

Toitū Te Whenua

- The licence is subject to Toitū Te Whenua.
- The Licensed Area, stocking levels and permitted activities may be amended, reduced or phased over time to give effect to that plan.

Termination

The Licensor may terminate:

- for convenience with at least six months' written notice;
- for cause if the Licensee breaches the licence and fails to remedy the breach;
- immediately if the Licensee becomes insolvent, bankrupt, enters liquidation, receivership, administration, statutory management, or similar;
- in part, to reduce the Licensed Area.

The Licensee is not entitled to compensation or alternative premises following termination.

Removal or Vesting of Improvements

- If required, the Licensee must remove Licensee Improvements within six months of expiry or early termination.
- The Licensee must reinstate and repair disturbance caused by the improvements.
- Otherwise, Licensee Improvements may vest in the Licensor without compensation.

Assignment and Subletting

- The licence is personal to the Licensee.
- It cannot be assigned, sublet or transferred without the Licensor's prior written consent.

Licence Not Registrable

- The licence does not create an interest in land.
- The Licensee's use does not exclude the Licensor's right to possession.

Signage

- The Licensee must not erect, paint, display or allow signs, notices or advertising material without prior written consent.

Licensor's Regulatory Role

- The Licensor signs as owner/administering body, not as regulatory authority.
- The licence does not bind the Licensor in its regulatory capacity.

Dispute Resolution

- A party must first issue a written Dispute Notice.
- Representatives must be nominated within five working days.
- If unresolved within fifteen working days after representatives first confer, either party may refer the matter to mediation or to any independent referee agreed by both parties.
- Urgent court relief remains available where necessary.

General Terms

- The licence is governed by New Zealand law.
- The licence is the entire agreement.
- Variations must be in writing and signed by both parties.
- Invalid provisions can be severed.
- Waivers must be in writing.
- Parties must do what is reasonably required to give effect to the licence.

Appendix 2: Recommended amendments to proposed licence terms and conditions

Note – recommended amendments shown in red.

Note – the below proposed licence terms and conditions do not include administrative conditions which are not relevant to the grazing effects management considered in this Hearing report. Conditions not included below relate to the licence fees, the dwelling (which is subject to a separate concession), insurance, liability, and health and safety.

Parties

- Licensor: Wellington Regional Council.
- Licensee: Name still to be confirmed.

Land and Licensed Area

- The land is within Belmont Regional Park, including the Waitangirua, Takapu and Kilmister Blocks.
- The licensed area is approximately 735 hectares, including the dwelling, but the effective grazing area excludes areas where stock will not have access, excluding areas marked as excluded on the plan as shown in Attachment One [to the final licence conditions, map not yet developed].

Purpose of the Licence

- The licence allows the Licensee to use the Licensed Area for grazing stock only.
- The licence is intended to support interim land management while progressing the long-term direction in Toitū Te Whenua Parks Network Plan 2020–2030, including progressive reduction of grazing over time.

Permitted Use

- An average annual grazing rate of up to 7 SU/ha stock units across the effective grazing area, and never greater than the minimum stock density necessary for land management purposes, in accordance with the Grazing Licence Practice Guide.
- This average grazing rate will be subject to review through the Annual Operations Plan process.

Term

- The term is four years.
- The commencement date is [insert date].
- There is no expectation or entitlement to renewal or extension.

Licensor Assets

The Licensor assets made available include:

- the dwelling;
- a three-bay implement shed;
- ten dog kennels;
- a 590L petrol tank;
- water supply infrastructure, including ten 25,000L tanks and two UV systems.

Licensee Obligations

The Licensee must:

- use the Licensed Area only for grazing;
- manage and maintain the Licensed Area in accordance with the Good Management Practices set out in the Grazing Licence Practice Guide;
- maintain fencing, stock-control systems and other improvements;
- ensure virtual fencing and electronic stock control systems are properly installed and operated;
- exclude stock from waterways, drains, wetlands and environmentally sensitive areas and from a setback area of at least 5 metres measured from the mapped edge of environmentally sensitive areas (which for waterbodies means the edge of the bed) unless approved in writing by the Licensor prior to stock access being granted;
- protect natural, scenic, historic, cultural, archaeological, biological, geological and scientific features;
- keep the area tidy and free from rubbish, carcasses and stored materials;
- manage biosecurity risks;
- repair damage caused by stock or the Licensee's activities;
- comply with laws, bylaws, consents and permits;
- occupy and use the area at the Licensee's own risk, and
- not apply fertiliser or herbicides within the Licenced Area.

Note – for the purpose of this licence and as classed by the application, environmentally sensitive areas include wetlands, ephemeral seeps, streams, riparian margins around all streams and intermittent channels, native forest remnants and regenerating indigenous vegetation, restoration planting areas and erosion-prone land. These areas have been mapped and are shown in Attachment One [to the final licence conditions, map not yet developed].

Licensor Obligations

- If the Licensee pays the fee and complies with the licence, the Licensor must allow the Licensee to use the Licensed Area during the term without interruption.

Public Recreation and Access

- The Licensee acknowledges the public has access to all of the Licensed area for recreation.
- The Licensee must not obstruct or interfere with public access unless approved by the Licensor.
- Temporary restrictions may only be implemented where necessary for public safety, animal welfare or safe grazing operations, and only with Licensor approval except for immediate temporary risk-management steps.
- The Licensee must comply with directions about access, signage and communications.

Buildings, Structures and Alterations

- The Licensee must not erect, place or permit any building, structure, shelter, yard, pen, hardstand or other permanent or temporary structure without the Licensor's prior written consent.
- Consent may be withheld at the Licensor's absolute discretion.

Annual Operations Plan

The Licensee must prepare and submit an Annual Operations Plan:

- before commencement; and
- by 30 June each subsequent year, or another date required by the Licensor.

The plan must cover:

- stock numbers, type, stocking rates and rotations;
- fencing, virtual fencing and stock control systems, including how the virtual fencing is working for stock exclusion;
- maintenance works:
- waterway, soil, vegetation and environmentally sensitive- area protection;
- review of performance against the previous plan, in particular any licence breaches;
- staged changes to grazing if needed to implement Toitū Te Whenua.

The Licensee must not materially depart from the approved plan without prior written approval.

Toitū Te Whenua

- The licence is granted pursuant to the Reserves Act 1977 and subject to Toitū Te Whenua.
- To implement Toitū Te Whenua a review of tThe Licensed Area may:
 - iii) reduce the Licenced Area over time, and
 - iv) amend or reduce stocking levels and permitted activities ~~may be amended, reduced or phased over time to give effect to that plan.~~

Termination

The Licenser may terminate:

- for convenience with at least six months' written notice;
- for cause if the Licensee breaches the licence and fails to remedy the breach as soon as practicable and in a way that minimises adverse effects of the breach;
- immediately if the Licensee becomes insolvent, bankrupt, enters liquidation, receivership, administration, statutory management, or similar;
- in part, to reduce the Licensed Area.

The Licensee is not entitled to compensation or alternative premises following termination.

Removal or Vesting of Improvements

- If required, the Licensee must remove Licensee Improvements within six months of expiry or early termination.
- The Licensee must reinstate and repair disturbance caused by the improvements.
- Otherwise, Licensee Improvements may vest in the Licenser without compensation.

Assignment and Subletting

- The licence is personal to the Licensee.
- It cannot be assigned, sublet or transferred without the Licenser's prior written consent.

Licence Not Registrable

- The licence does not create an interest in land.
- The Licensee's use does not exclude the Licenser's right to possession.

Signage

- The Licensee must not erect, paint, display or allow signs, notices or advertising material without prior written consent.

Licenser's Regulatory Role

- The Licenser signs as owner/administering body, not as regulatory authority.
- The licence does not bind the Licenser in its regulatory capacity.

LGOIMA

- The Licensee acknowledges the Licensor is subject to the Local Government Official Information and Meetings Act 1987.
- Information about the licence may be disclosed under LGOIMA.
- The Licensor has final discretion over disclosure decisions.

Dispute Resolution

- A party must first issue a written Dispute Notice.
- Representatives must be nominated within five working days.
- If unresolved within fifteen working days after representatives first confer, either party may refer the matter to mediation or to any independent referee agreed by both parties.
- Urgent court relief remains available where necessary.

General Terms

- The licence is governed by New Zealand law.
- The licence is the entire agreement.
- Variations must be in writing and signed by both parties.
- Invalid provisions can be severed.
- Waivers must be in writing.
- Parties must do what is reasonably required to give effect to the licence.

Appendix 3: Out-of-scope submissions

Submission point	Submitter/s	Why out of scope
Concerns about wildfire risk, legacy munitions risk and pest plants in retired areas outside the grazing licence area.	Preserve Belmont Farm; Paul Robinson; Peter Law; Paul Nation	This relates to land outside of the Licenced Area. The license process cannot be used to manage these effects. They can instead be managed through the BRP master planning process.
Retain any of the 310 hectares scheduled for retirement which will not be actively planted as grazing land due to fire risk, legacy munitions risk, insufficient funding and impacts of conversion to rank grass, scrub, weeds and gorse.	Peter Law; Preserve Belmont Farm Park; Paul Robinson; Peter Law	This relates to land outside of the Licenced Area. The license process cannot be used to require grazing outside of the area included in the application. This issue can instead be considered through the BRP master planning process.
Retain grazing on all available grassland [as it relates to grass land outside licence area].	Marlene Bowles; Paul Robinson	This relates to land outside of the Licenced Area. The license process cannot be used to require grazing outside of the area included in the application. This issue can instead be considered through the BRP master planning process.
Consult the New Zealand Defence Force on the consequences of wildfire entering legacy munitions areas.	Preserve Belmont Farm Park	This matter cannot be influenced by this process.
That the wildfire assessor has information on historic ammunition magazines, demolition sites, dumping sites, and incineration areas.	Preserve Belmont Farm Park	This matter cannot be influenced by this process.
The Wellington Regional Council Environment and Climate Committee acted outside its mandate in suggesting this grazing licence as it is inconsistent with these documents.	Pene Burton Bell; FoMR; Forest and Bird	This process is to make a decision on the application. The decision maker does not have the power to reconsider previous decisions made by the Environment and Climate Committee. Equally, the decision maker is not bound by the previous decision.
Review the process failures that allowed the Climate and Environment committee to make recommendations outside their mandate.	Pene Burton Bell	This process is to make a decision on the application. The decision maker does not have the power to review or reconsider previous decisions made by the Environment and Climate Committee.

The Applicant should rescind, set aside or ignore that recommendations of Environment and Climate Committee 26/02/2026.	Russell Bell	This process is to make a decision on the application. The decision maker does not have the power to reconsider previous decisions made by the Environment and Climate Committee cannot be revisited. Equally, the decision maker is not bound by the previous decision.
Support the licence subject to a high standard of animal welfare being ensured.	Grenville Gaskell and Trish Heath	Animal welfare is not in scope of the Reserves Act.

Appendix 4: Response to request for information from the Applicant

Appendix 5: Objections and submissions on proposed grazing licence

Appendix 6: Map of Belmont Regional Park – Proposed Licence Area