

14 July 2026

File Ref: OIAPR-1274023063-52710

By email: [REDACTED]

Tēnā koe [REDACTED]

Request for information 2026-243

I refer to your request for information dated 3 June 2026, which was received by Greater Wellington Regional Council (Greater Wellington) on 3 June 2026.

We have reviewed your correspondence of 3 June 2026. **Attachment 1** provides the parts of your correspondence that we have identified as an official information request. The parts of your letter that are statements are noted, thank you for raising these matters.

Greater Wellington's response follows:

Your request has been assessed under the Local Government Official Information and Meetings Act 1987 (LGOIMA).

1. *Are GWRC Health and Safety aware that the Toitū Te Whenua Parks Network Plan 2020–2030 proposes land regeneration in Belmont Regional Park that presents significant health and safety risks, potentially creating a fire risk across more than 1,000 hectares?*

In response to this question, and every part of your request about whether Greater Wellington's Health, Safety and Wellbeing team (the HSW team) is aware of the various matters raised in your request, a member of the team has read your information request. However, the HSW team is not actively involved in assessing or managing any risks from the regeneration at the present time. The role of the HSW team is to provide support and advice on matters that may impact the health, safety, or wellbeing of workers, in line with the Health and Safety at Work Act 2015 and associated regulations. Management of operational risks is responsibility of relevant operational teams, and the HSW team provides an internal advisory service. This may include advising on operational planning for restoration work in the future.

The HSW team is not involved in:

- Reserve management decisions.
 - Consultation with external parties around the impacts of implementing Greater Wellington plans, including Toitū te Whenua-Parks Network Plan.
 - Managing risk to assets and infrastructure.
 - Liaising with other agencies on the health and safety of their workers.
2. *Does Health and Safety acknowledge that the Toitū Te Whenua Parks Network Plan 2020–2030, adopted in 2020, was approved without a detailed wildfire risk plan or operational fire assessment being completed beforehand?*

Regarding the HSW team, please refer to our response to question 1 above.

Please refer to our response to your previous request dated 25 June 2026, our reference 2026-233, in which we stated - Toitū te Whenua provides the strategic direction for council officers to carry out. Detailed wildfire risk assessments and operational modelling were not required to inform this direction. Toitū te Whenua does acknowledge fire risk and as part of implementation officers are undertaking fire risk management planning.

3. *Are Health and Safety aware of the fire risk report completed after the adoption of the Toitū Te Whenua Parks Network Plan 2020–2030, including the 2021 assessments and the recent 2025 report by Tony Teeling highlighting wildfire risks within Belmont Regional Park? and*
4. *Does health and safety know that Toitū Te Whenua Parks Network Plan 2020–2030 focused on ecology and did not fully consider wildfire risk, operational impacts, recreation impacts, and public safety?*

Regarding the HSW team being aware, please refer to our response to part 1 above.

New Zealand Defence Force: Potential Unexploded Ordnance and Historic Dump Sites within Belmont Regional Park

5. *Are Health and Safety aware of the Defence Force munition dump sites and the possibility of buried WWII era unexploded ordnance within Belmont Regional Park? (see attachment 1) and*
6. *Are Health and Safety aware that the New Zealand Defence Force cannot guarantee that all risks were removed prior to the transfer of the land to the Department of Lands and Survey between 1967 and 1971, noting that Crown due diligence requirements at that time were less stringent? and*
7. *Does health and safety know that the park is no longer part of the Defence estate, and that it is not the role of the NZDF to guarantee that all risks have been removed?*

Regarding parts 5, 6 and 7 please refer to our response to part 1 above.

Greater Wellington's view on the risk to park users of potential unexploded ordnance igniting during a fire is low risk. It is extremely unlikely that park users would be in the area of potential unexploded ordnance during a fire event.

We accept that there is a risk that potential unexploded ordnance, if on the ground surface or underground to a shallow depth, could become hazardous during firefighting and fire extinguishing activities during a fire response. Greater Wellington will identify the areas of potential unexploded ordnance with any persons participating in firefighting activities.

8. *Has Health and Safety been advised that any firebreak construction or earthworks across the Belmont site have the potential to disturb the ground, and that the NZDF Directorate of Strategic Commitments should be consulted before any such work? (see attachment 2)*

Please refer to our response to part 1 above. Greater Wellington is not aware of any obligation to consult the New Zealand Defence Force Directorate of Strategic Commitments before carrying out work that could involve ground disturbance.

11. *Did health and safety know that people had found munitions in the park?*

Please refer to our response to part 1 above.

Stage One, Two, Three and Four of retirement of grazing to allow regeneration and the fire risks involved? (see attachment 5)

13. *Does the Health and Safety team understand that the first-year proposal for grazing retirement involves large north-west-facing areas running from Transmission Gully to the top of the park? and*
14. *Is Health and Safety aware that, in the first year of the proposed grazing retirement, paddocks (White Lane, White and Heffernan) adjacent to GWRC neighbours in Kelson are planned to be retired from grazing, potentially increasing fire risk to the Kelson suburb? and*
15. *Are Health and Safety aware that the other proposed retirement area around Finch's and Falling has previously had munitions discovered near bunker sites, and that recent findings suggest additional ordnance cases may still be present in a nearby creek within the area? and*
16. *Did health and safety know the other proposed areas of retirement year two, three and four are tops of hills that will be a fire risk if grazing is removed? Yet the (SCM) said all tops will stay open?*

Regarding questions 13-16 and the HSW team understanding, knowing or being aware, please refer to our response to question 1 above.

For further information about Greater Wellington's management of fire risk in the areas noted in parts 13-16, please refer to our response to your previous request dated 6 May 2026, our reference 2026-157.

Transpower and First Gas: Fire Risk to Major Nationally Important Infrastructure

17. *Are Health and Safety aware that Transpower has found no record of being formally consulted by GWRC regarding the proposed land-use changes within Belmont Regional Park? and*
18. *Does health and safety know the fire risk to major nationally important infrastructure?*

Regarding part 17-18 and the HSW team being aware or knowing, please refer to our response to part 1 above.

Regarding the other comments within this part of your request, Transpower have provided Greater Wellington shapefiles identifying suggested planting offsets for their overhead and underground assets (see **Attachments 2, 3, 4 and 5**).

19. *North Island Gas Main: Does Health and Safety know if a rupture to the North Island natural gas mains pipeline will result in the gas supply to all natural gas users being cut? and*
20. *First Gas personnel require regular vehicular access through Belmont Regional Park to inspect, service, maintain, and repair critical gas infrastructure. How has Health and Safety assessed the increased wildfire risk to these workers if large areas of the park are retired from grazing and vegetation fuel loads increase? and*
21. *Has Health and Safety assessed the risk that essential maintenance vehicles, machinery, or emergency repair activities may inadvertently become ignition sources during periods of high fire danger, particularly where grazing retirement has increased fuel loads adjacent to access tracks, transmission corridors, and critical infrastructure?*

Regarding parts 19-21 and the HSW team being aware or knowing, or whether the HSW team has assessed these risks, please refer to our response to part 1 above.

The duties of Greater Wellington as a landowner/manager are to inform other parties undertaking work on Greater Wellington land of known hazards. Future fire risk will be part of site safety briefings provided to other parties working on Greater Wellington land. However, the Park Ranger team would provide these briefings, not the HSW team.

Regarding vehicular access to the park during high fire risk site conditions, please refer to our response to your previous request dated 6 May 2026, our reference 2026-157, Attachment 12.

22. *What measures will GWRC implement to minimise wildfire risk along infrastructure access routes and ensure compliance with its duty under the Health and Safety at Work Act 2015 to protect workers and other persons from foreseeable risks arising from its land management decisions?*

There are two separate matters in this part which we respond to below.

Regarding what measures Greater Wellington will implement to minimise wildfire risk along infrastructure access routes, Greater Wellington is currently working to prioritise the completion of actions listed in Attachment 10 to our response to your previous request dated

6 May 2026, our reference 2026-157. Attachment 12 to our 6 May 2026 response describes other measures relating to park activity controls to manage fire risk.

Regarding the reference to the Health and Safety at Work Act 2015 (HSW Act) to protect workers and other persons from foreseeable risks arising from Greater Wellington's land management decisions, Greater Wellington's duties under the HSW Act don't include managing all fire risks at regional parks. They are focused on managing risks to our 'workers' and risks relating to our 'workplaces'¹. We would not normally have duties under the Health and Safety at Work Act 2015 in relation to places where no work is being done, such as parts of regional parks that are regenerating into native bush where no active work is occurring at the time.

23. *If wildfire fuel loads increase as a result of grazing retirement, has Health and Safety assessed whether this may expose First Gas and Transpower to a greater level of risk than exists under the current grazing management regime?*

Regarding the HSW team assessment, please refer to our response to part 1 above.

Fire Risk to Park Users, The Public and Residents

24. *What safety measures does GWRC intend to implement to protect neighbouring communities in the event of a major wildfire originating within Belmont Regional Park following large-scale grazing retirement and increased fuel accumulation?*

Greater Wellington is currently working to prioritise the completion of actions listed in Attachment 10 to our response to your previous request dated 6 May 2026, our reference 2026-157. Attachment 12 to our 6 May 2026 response describes other measures relating to park activity controls to manage fire risk.

25. *Is Health and Safety aware of the risks to public safety and potential loss of life if a wildfire breaks out within Belmont Regional Park as areas revert to weeds, rank grass, and gorse, and people become trapped within the park? What systems, evacuation procedures, emergency access routes and public warning measures will be put in place to protect park users? and*

26. *Does Health and Safety acknowledge that manuka and kanuka are recognised as highly flammable vegetation under dry conditions and that extensive regeneration of these species may increase wildfire fuel loads within Belmont Regional Park? Considering Belmont has a lot of kanuka and manuka planted in areas of restoration, what assessment*

the term 'workplace' is defined in the HSW Act as follows:

20Meaning of workplace

(1) In this Act, unless the context otherwise requires, a **workplace**—

(a) means a place where work is being carried out, or is customarily carried out, for a business or undertaking; and

(b) includes any place where a worker goes, or is likely to be, while at work.

(2) In this section, **place** includes—

(a) a vehicle, vessel, aircraft, ship, or other mobile structure; and

(b) any waters and any installation on land, on the bed of any waters, or floating on any waters.

has been undertaken of the associated health and safety risks to park users, neighbouring residents, critical infrastructure, and emergency response operations? and

27. *Does Health and Safety know that gorse is being allowed to regenerate within Belmont Regional Park (particularly in the Kilmister block that is owned by Hutt City Council and managed by GWRC, creating a significantly high fuel load? If large areas are allowed to continue regenerating in the park, what fire risk safety measures are in place? and*
28. *Does health and safety know the Structured Decision-Making (SDM): decisions were made in May 2025 before the Prometheus Wildfire Risk reports were completed by Tony Teeling from Integrated Consultancy Ltd in July and August 2025. and*
29. *Wildfire Risk Management Analysis Tony Teeling July 2025: Tony Teeling "Presently, the grazing management effectively reduces wildfire risk through fuel reduction, resulting in reduced fire intensity. The proposal to reduce the grazing by half in 2026 will result in less fuel reduction and therefore fires with higher intensity"?*

Regarding parts 25-29 and the HSW team being aware, acknowledging or knowing about the matters raised in these questions, please refer to our response to part 1 above.

Regarding question 29 and noted decrease in fuel reduction leading to higher fire intensity, Greater Wellington acknowledges this is an impact of changing land use and seeking to restore native vegetation and natural ecosystems throughout the park. The implementation of actions in the noted report are mitigations of the increased risk resulting from land use change.

FENZ and Helicopter Operations

30. *Does Health and Safety acknowledge that GWRC has identified many park tracks as unsuitable for urban fire engines, meaning wildfire response may rely heavily on helicopter operations? and*
34. *Does Health and Safety know that no surface ponds or dams have been constructed within Belmont Regional Park to allow helicopters equipped with monsoon buckets to efficiently scoop water for wildfire suppression? and*
35. *Does Health and Safety know that it can take up to two hours for Fire and Emergency New Zealand (FENZ) to establish a portable heli tank for helicopter water operations?*

Regarding parts 30, 34 and 35, and the HSW team being aware, acknowledging or knowing about the matters raised in these questions, please refer to our response to part 1 above.

Greater Wellington acknowledges the matters raised in 30-35. These matters will be valuable to our fire response planning that is expected to be in development later this year in collaboration with Fire and Emergency New Zealand.

38. *Do property owners know they rely entirely on their private insurance policies to see if land or property damage from a wildfire is covered?*

As we have no information on what property owners do or do not know we are refusing this part of your request under section 17(g) of the Act on the grounds that the information requested is not held by Greater Wellington and we have no grounds for believing that the information is either—

- (i) held by another local authority or a department or Minister of the Crown or organisation; or
- (ii) connected more closely with the functions of another local authority, or a department or Minister of the Crown or organisation.

Please refer to our response to your previous request dated 6 May 2026, our reference 2026-157, Attachment 10, which sets out some actions relating to fire risk affecting land adjacent to Belmont Regional Park.

Health and Safety Legislation

40. *Does Health and Safety acknowledge that GWRC, as a PCBU under the Health and Safety at Work Act 2015, has a legal obligation to ensure that proposed grazing retirement, vegetation changes, and planting programmes within Belmont Regional Park do not create or increase foreseeable fire, access, infrastructure, or public-safety risks to workers, park users, neighbouring residents, contractors, and other affected persons?*

Please refer to our response to part 22 above and the explanation of what is a “workplace” under the HSW Act in footnote 1. Greater Wellington does not consider that the HSW Act applies in all areas of the park at all times.

Structured Decision-Making (SDM)

55. *The Structured Decision-Making (SDM) process states that it seeks to avoid decisions being influenced by individual biases. SDM deliberately left out Councillors, neighbouring residents, park users, stakeholders, and other affected parties from the assessment panel. Why were 10 internal GWRC representatives compared with only 5 external entities, and how was this considered a balanced process? and*
56. *Does Health and Safety consider that the SDM process may have been disproportionately weighted towards ecological outcomes while giving insufficient consideration to wildfire risk, fuel loading, public safety, emergency access, infrastructure protection, and the practical management benefits currently provided by grazing? and*
57. *Given that the proposed changes have significant implications for wildfire risk, public safety, recreation, infrastructure, and neighbouring communities, why were emergency management representatives, neighbouring landowners, stakeholders, councillors and regular park users not directly included in the SDM assessment process? and*
58. *Do health and safety know that the SDM report says it will be a fire risk for 20-40 years? and*
59. *Does Health and Safety consider in the SDM that reducing actively grazed land within Belmont Regional Park to approximately 100 hectares over the next 10 years will increase wildfire fuel loads and fire risk? If not, what evidence supports this conclusion?*

Regarding parts 56, 58 and 59, and the HSW team considering or knowing about the matters raised in these questions, please refer our response part 1 above regarding the role of the HSW team.

Regarding parts 55-59, the extent of the information Greater Wellington holds which is relevant to the Structure Decision Making (SDM) process in reference has been provided to you. Please refer to our response to your previous request dated 6 May 2026, our reference 2026-157, Attachments 2A and 2B.

Park Closures Due to Fire Risk

62. *How will GWRC manage closing the park when it becomes a fire risk in the future due to grazing being removed?*

Please refer to our response to your previous request dated 6 May 2026, our reference 2026-157, Attachment 12.

Animal Welfare Under the SDM, open hilltops would be retained under all scenarios

63. *If the grazed area of the park is proposed to be reduced, what assessment has been undertaken regarding the welfare of livestock that will remain grazing on highly exposed hilltops and ridgelines within the park? and*

1. *What specific animal health and welfare obligations will apply to livestock grazing under the reduced grazing footprint and associated licence conditions? and*
2. *How will livestock be protected from prolonged exposure to extreme weather conditions, including high winds, heavy rainfall, cold temperatures, and summer heat? and*
3. *What minimum requirements for shelter, shade, and natural protection will be mandated under the grazing licence issued by Greater Wellington Regional Council? and*
4. *Has an assessment been undertaken to determine whether the reduced grazing areas provide sufficient access to natural shelter during adverse weather events? and*
5. *What systems will be in place to monitor, audit, and enforce compliance with animal welfare obligations on an ongoing basis? and*
6. *Given that a significant proportion of the retained grazing area appears to consist of exposed terrain, how will GWRC ensure that animal welfare requirements are met while also achieving its broader land management and environmental objectives?*
7. *What evidence supports the assumption that dairy-beef cattle fitted with collars will not be spooked by horse riders, mountain bikers, or other park users? What assessment has been undertaken of the associated risks and potential animal welfare impacts should an animal become startled and breach the designated grazing boundary or fencing perimeter?*

Under New Zealand's Animal Welfare Act 1999, both the stock owner and the landowner can be held responsible for animal welfare if the landowner has day-to-day responsibilities or is the "person in charge" of the animals. However, Greater Wellington has no intention of being the person in charge of the animals in issue. Therefore, the responsibility for animal welfare will rest with the livestock owner who holds the grazing license.

We are therefore refusing this part of your request under section 17(g) of the Act on the ground that the information requested is not held by Greater Wellington and we have no grounds for believing that the information is either—

- (i) held by another local authority or a department or Minister of the Crown or organisation; or
- (ii) connected more closely with the functions of another local authority, or a department or Minister of the Crown or organisation.

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Act.

Please note that it is our policy to proactively release our responses to official information requests where appropriate. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā



Fathima Iftikar

Kaiwhakahaere Matua Rōpū Taiao | Group Manager Environment

Attachment 1 for response to request 2026-243

The parts of your correspondence that we have identified as an official information request.

1. *Are GWRC Health and Safety aware that the Toitū Te Whenua Parks Network Plan 2020–2030 proposes land regeneration in Belmont Regional Park that presents significant health and safety risks, potentially creating a fire risk across more than 1,000 hectares?*
2. *Does Health and Safety acknowledge that the Toitū Te Whenua Parks Network Plan 2020–2030, adopted in 2020, was approved without a detailed wildfire risk plan or operational fire assessment being completed beforehand?*
3. *Are Health and Safety aware of the fire risk reports completed after the adoption of the Toitū Te Whenua Parks Network Plan 2020–2030 including the 2021 assessments and the recent 2025 report by Tony Teeing highlighting wildfire risks within Belmont Regional Park?*
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New Zealand Defence Force: Potential Unexploded Ordnance and Historic Dump Sites within Belmont Regional Park

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7. *Does health and safety know that the park is no longer part of the Defence estate, and that it is not the role of the NZDF to guarantee that all risks have been removed?*
8. *Has Health and Safety been advised that any firebreak construction or earthworks across the Belmont site have the potential to disturb the ground, and that the NZDF Directorate of Strategic Commitments should be consulted before any such work? (see attachment 2)*
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24. What safety measures does GWRC intend to implement to protect neighbouring communities in the event of a major wildfire originating within Belmont Regional Park following large-scale grazing retirement and increased fuel accumulation?
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27. Does Health and Safety know that gorse is being allowed to regenerate within Belmont Regional Park (particularly in the Kilmister block that is owned by Hutt City Council and managed by GWRC, creating a significantly high fuel load? If large areas are allowed to continue regenerating in the park, what fire risk safety measures are in place?
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58. Do health and safety know that the SDM report says it will be a fire risk for 20-40 years?
59. Does Health and Safety consider in the SDM that reducing actively grazed land within Belmont Regional Park to approximately 100 hectares over the next 10 years will increase wildfire fuel loads and fire risk? If not, what evidence supports this conclusion?

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62. How will GWRC manage closing the park when it becomes a fire risk in the future due to grazing being removed?

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animal welfare impacts should an animal become startled and breach the designated grazing boundary or fencing perimeter?

PROACTIVE RELEASE