

From: Jonathan Ravens s9(2)(a)
Sent: Tuesday, 24 February 2026 11:53 am
To: Land Exchange
Cc: Anthony Davies; Craig Stansfield
Subject: Comments on land draft land exchange application and Belmont Quarry Development
Attachments: Comment_form_for_land_exchange_application_-_Belmont_Quarry.pdf;
FoBRP_Commentary_Final.pdf

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Dear Land-exchange team,

Please find attached the comments from Friends of Belmont Regional Park Inc., on the proposed land exchange application for Belmont Regional Park, which the Department has invited us to provide. There are two attachments, both in PDF format, one being the submission form, and the other being our commentary.

Please confirm receipt of this Email and attachments, and let me know if you need anything else.

As always, the Friends would be happy to meet with the Department to discuss this issue, or to organise a guided site visit, should you wish.

Many thanks,
Jonathan Ravens, for Friends of Belmont Regional Park
s9(2)(a)

(cc;d to Anthony Davies & Craig Stansfield, Convener & Secretary of FoBRP)



An application has been made by Winstone Aggregates under the Fast-track Approvals Act 2024 (the Act) for a land exchange application for Belmont Quarry Development (the project).

How do I make a comment on the application?

- Fill in the details on the attached form and:
- **Email** the form to landexchange@doc.govt.nz. Please mark in the subject line: "Comments on land draft land exchange application and Belmont Quarry Development; or
- **Post** the form the form to Land Exchange Fast-track Application, Conservation House, PO Box 10 420, Wellington 6143 in time for the form to be received by the date comments are due by.

Comments must be received by the Department of Conservation, on behalf of the Director-General of Conservation, no later than the date comments are due by. The Department of Conservation is not able to issue extensions of waivers to the deadline and may not consider comments received late.

If you are an iwi authority you may share the consent application with hapū whose rohe is in the project area in the application and choose to include comments from the hapū with any comments you may wish to provide.

Closing date of comments

The closing date and time for sending objections or submissions to the Director-General on this matter is **26 February 2026**.

Important information

Your personal information will be held by the Department of Conservation and used in relation to the land exchange application process. You have the right to access and correct personal information held by the Department of Conservation.

The Fast-track Team will forward copies of any comments received to Winstone Aggregates and they may be published on the Fast-track website.

Your name and organisation will be identified in the draft report, which may become publicly available. Having commented on the application, you will be invited to comment on the draft report that the Department of Conservation will prepare.

If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be provided to the Director-General of Conservation consideration on withholding that information from publication.

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All information held by the Department of Conservation is subject to the Official Information Act 1982.



Contact details

All sections of this form with an asterisk (*) are mandatory.

Organisation name (if submitting on behalf of a business, community group, etc.)	Friends of Belmont Regional Park Incorporated
*First and Last name	Jonathan Ravens
*Email (Communication from DOC will be via email unless alternate contact requested)	s9(2)(a)
Alternate contact for all DOC communication	Anthony Davies s9(2)(a)
*Phone/Mobile	s9(2)(a)
Postal Address and Post Code	s9(2)(a)

We will email you the draft land exchange report for your comment

Please identify your preferred method for receiving the draft land exchange report for your comment.	Email
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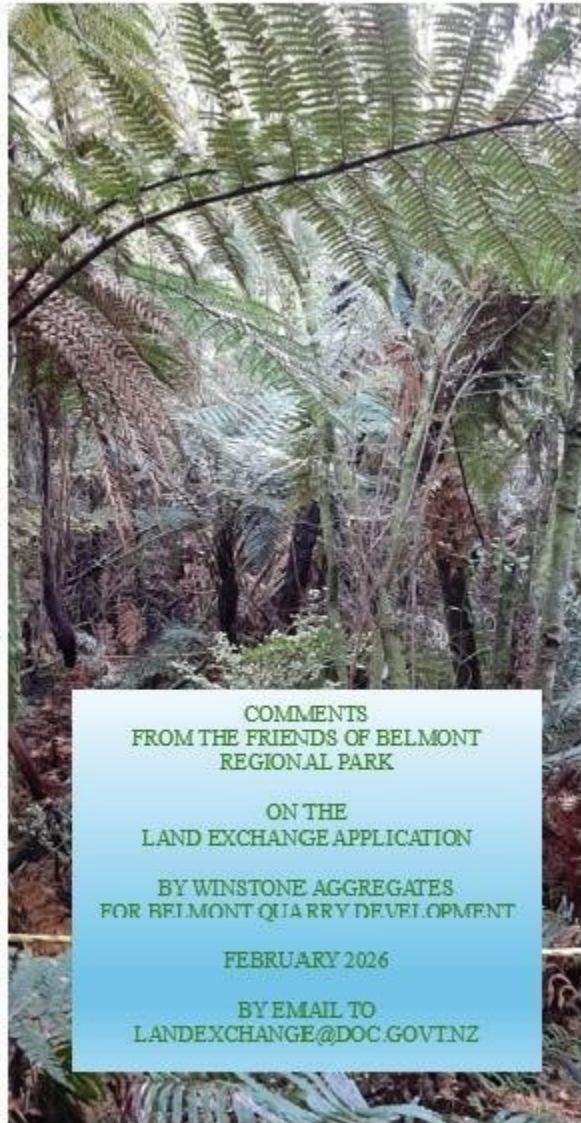
I wish to **keep my contact details confidential - yes please.**

Note: Your contact details will be not made public, but your name and organisation may be published alongside your commentary

Attachments

If you are using attachments to support your commentary, please clearly label each attachment, complete the table below and send in your attachments with this form.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
FoBRP_Commentary_final.pdf	PDF	Written response from FOBRP on this proposal



COMMENTS
FROM THE FRIENDS OF BELMONT
REGIONAL PARK

ON THE
LAND EXCHANGE APPLICATION

BY WINSTONE AGGREGATES
FOR BELMONT QUARRY DEVELOPMENT

FEBRUARY 2026

BY EMAIL TO
LANDEXCHANGE@DOC.GOVTNZ

Submission to: Fast-Track Evaluation Panel, Department of Conservation
By email: landexchange@doc.govt.nz
From: Friends of Belmont Regional Park (FoBRP)
Subject: Belmont Quarry Development
Winstone Aggregates application for land exchange
Date: 24 February 2026

References to appendices in this document refer to the application documents filed at
<https://www.fasttrack.govt.nz/projects/belmont-quarry-development/land-exchange-application>

1. Introduction

Thank you for the opportunity to comment on Winstone Aggregates' application for a land exchange affecting Belmont Regional Park.

The Friends of Belmont Regional Park (FoBRP) is an independent community group dedicated to preserving, restoring, and ensuring the long-term integrity of the park while promoting its natural values, biodiversity, and recreational use. We act as advocates, educators, and volunteers, bridging the surrounding communities and Greater Wellington Regional Council (GWRC) to enhance the park's environment. Since 2002, we have engaged with stakeholders to advocate for the park. As an incorporated society our objective is to 'ensure the future integrity of the Belmont Regional Park and its protection in perpetuity for the use and enjoyment of present and future generations'.

Winstone Aggregates (WA) is applying for a land exchange under section 33 and Schedule 6 of the Fast-track Approvals Act 2024. The exchange would involve up to 34 hectares of Fletcher-owned land to be added to the conservation estate and approximately 23.5 hectares of conservation land within Belmont Regional Park to be transferred to WA. If the land exchange is approved, WA would then use the land currently in the park as a place to dump overburden in order to extend the life of the quarry. The conservation land currently in the park is referred to here as the proposed overburden disposal area (POBDA).

The FoBRP has already provided much input to the Department of Conservation (DoC) regarding the application for a land exchange for the purpose of extending the extent and operations of Belmont Quarry. We have discovered and published much about the ecology of the area – in particular the abundance of valuable & threatened tree and plant species, and the rare uplifted wetlands present that are vital for these species. And in the process we have significantly re-shaped the understanding of the conservation land involved, so that it is now clear that the applicant's original dismissal of the DoC land as having "low ecological value" rested on superficial and inadequate ecological surveys that entirely missed the key values of the block.

The POBDA is now known to contain areas of very high ecological value.

Although our previous submissions to DoC have largely focused on the ecological aspects of the proposal, the FoBRP is also concerned about the significant adverse effect on recreation activities, which is a core purpose of the Park. We will address those issues, and others, below.

At the outset, we wish to note the unprecedented situation which this Fast Track Act creates. Under the Toitū Te Whenua Parks Network Plan 2020-2030 prepared under the Reserves Act 1977 and the Local Government Act 2002, a land exchange that takes land out of the regional park and reduces publicly accessible recreation areas, must be sent out for public submission. But that is not happening here.

It also appears that the RMA plan rules that currently apply to the land in the park, which strongly protect it against any use for overburden, are not proposed to be changed by a public plan change process before the exchange takes place. The Fast Track Act seems to say that the fact that this proposal could not get consents under current plan rules may not be a reason on its own to prevent this proposal going ahead. We find this approach to such an important proposal very concerning, because it means that you do not have perspectives from the public users who have accessed this part of the park and adjoining areas over past decades. Consequently, your reliance on information provided by the applicant, including expert evidence, should recognise this deficit.

The FoBRP believe that there are five principal reasons why the application for land exchange should be declined. These are listed here, with a brief explanation, and will be explored in detail in the sections following.

Reason I : There would be no net increase in conservation values

The Fast-track Approvals Act (FAA) 2024 No 56 states that the Fast-track panel “*must not grant the approval unless it is satisfied that the land exchange (including money and conditions) will enhance the conservation values of conservation areas and Crown-owned reserves considered as a whole*”. The land-swap can therefore only be approved if there is a net increase in conservation values.

The applicant attempts to show that that is the case, but our analysis shows that there would instead be a definite loss in conservation values. The scoring system in the Ecological Assessment (Appendix B1) is skewed and confused on important points, and relies in large part on the values of two parcels of land whose conservation values are already legally protected in perpetuity, due to their QEII covenant status. These two areas cannot therefore be considered to add conservation value; neither can they offer any recreation value. The FoBRP considers it disingenuous and inappropriate for the applicant to propose that these blocks be considered as offsets for quarry activity again, when they were originally conserved as offsets for previous quarry expansion.

An August 2025 Cabinet paper agrees with this. Whilst discussing the exclusions under the FAA, the paper notes that private land that is already protected, eg by conservation covenant, is “***not likely to meet the test for land exchange***”, since “***shifting ownership does not increase the protection for such areas.***”.

The proposed land exchange has been discussed and declined twice by DoC, in 2018 and 2022; DoC concluded that the POBDA did not meet the criteria of having “*no to low conservation value*”. Since then, the land in question is essentially unchanged, except that we now know that its ecological value is much higher than previously recognised.

Reason II : Valuable and threatened species and wetlands would be destroyed

The POBDA area has been found to contain healthy populations of swamp maire, ramarama and other endangered species. 24 swamp maire are known at present, and 11 of these are currently fruiting. The rare uplifted wetland ecology that these species need, and the trees themselves, would also be destroyed.

Reason III : The land proposed for exchange is not suitable for a like-for-like exchange

DoC’s advice on proposed land exchanges states that “*The land being acquired will attain the status the land being transferred held, it must therefore be suitable for this purpose.*” Belmont Regional Park is a vital recreation resource for the local communities, but the application proposes to remove 24 ha of this recreation land, to be exchanged for areas which cannot be used for recreation; it is therefore not fit for purpose. We will show below that the Recreation assessment (Appendix B4) completely misrepresents the actual recreation usage and value of the POBDA.

Reason IV : The proposed application would severely fragment the park

The proposal would replace one large and roughly square-shaped block with three blocks that are physically disconnected, with awkward shapes, and consequently a much greater (3.6x) perimeter-to-area ratio, increased incursion of invasive species and a generally poor ecological outcome. The applicant has been made aware of this problem (Appendix C3, p8) but there is no way of mitigating it.

Reason V : The proposal would severely affect the hydrology of the area.

The Hydrology assessment (Appendix B9) significantly underestimates the streams in the POBDA, and states that it contains no perennial streams, concluding that the proposed dumping of overburden would not affect the drainage characteristics of the area. In fact the POBDA contains streams that have never been seen to dry up in the last 20+ years, and the wetland ecology of the area would be destroyed.

2. No net increase in conservation values

The Land Exchange Report uses “DoC-Get” and “DoC-Give” to refer to the land owned by the applicant, and to the Regional Park land that the applicant wishes to acquire for overburden disposal.

As already mentioned, the FAA states that the panel “*must not grant the approval unless it is satisfied that the land exchange (including money and conditions) will enhance the conservation values of conservation areas and Crown-owned reserves considered as a whole*”. The land-swap can therefore only be approved if there is a net increase in conservation values.

We understand that this is a new statutory test. As the land exchange report notes (page 96), previous exchange discussions faced the obstacle that the DoC-Give land has not diminished in conservation value (and is steadily increasing in value). Previously, that was the only way that DoC could consider giving up land in an exchange.

At the heart of this issue is the question as to what parts of the proposed “DoC-get” areas can justifiably be included in the comparison of conservation values. The proposed “Doc-get” areas are summarised in Fig. 1, below. The various parcels in the DoC-get areas are :

- **Southern Gully** is the small block in the south-west corner of Fig 1. It comprises 3.94 ha of native vegetation surrounding a poorly-drained area previously used for grazing.
- **Northern Gully** is the roughly L-shaped block to the west of the existing quarry. The total area is 12.6 ha, of which 2.87 ha comprises established native forest, already protected by a QEII Covenant, with the remainder mostly being regenerating bush. Parts of the Northern Gully area have already been subject to overburden dumping.
- The **Firth Block** is the yellow-shaded area to the east of the existing quarry. This comprises 9.6 ha of mixed native forest, and includes part of a pond which straddles the boundary with the POBDA block. The entire Firth Block is already conserved by QEII Covenant.
- **Dry Creek** here refers to a rectangular ring of land surrounding the old quarry site, NW of Haywards, comprising 7.94 ha of mixed exotic and regenerating native forest. Some parts have been previously used for quarrying purposes.



Fig. 1 From the Land Exchange Report, p13. The “DoC-Give” area is the roughly square-shaped region outlined in solid blue; the “DoC-Get” areas are those outlined in dashed blue. The two QEII-protected areas are shaded in yellow.

Table 28 of the Land Exchange Report (p76) summarises the comparative assessment of the conservation of the various land areas, and we reproduce it here (noting that the stream lengths in their last row are transposed) :

Table 28: Summary of comparative assessment of conservation values.

Discipline	DOC-Give	DOC-Get	Net gain
Ecology (Habitat)	Moderate	Low- Very High	Yes
Ecology (Birds)	Moderate	High	Yes
Ecology (Bats)	Nil	Nil	Unchanged
Ecology (Lizards)	33.19 ha of habitat	18.83 ha of habitat	Yes
Landscape	Moderate	Moderate-High	Yes
Recreation	Low	Low	Unchanged
Archaeology	Very-Low	Very-Low	Unchanged
Aquatic	3,029 m of stream length	1,855 m of stream length	Yes

This summary relies on the assumption that the ecological values of the QEII areas within DoC-Get should be taken into account in the overall comparison. But that would make no sense, because those QEII areas already have legal protection, and thus already form part of the broader conservation estate. **Their conservation value was created when they were first protected under a QE11 covenant and cannot be created a second time.** That they are not actually owned by DoC does not affect their ecological value, nor the ongoing protection afforded to those areas. Arguably, these areas are more protected under QEII covenants (none of which have been legally challenged) than they would be as DoC-owned land. The proposal would also transfer the onus of protection (eg pest control and boundary maintenance) from the applicant to DoC.

By contrast, we now present what this summary table shows when the QEII areas are not included in the comparison, with explanatory comments to follow. For clarity, we have added rows for Area, Fragmentation, wetland, and recreation :

Discipline	Doc-Give	Doc-Get excl QEII	Net Gain
Area	23.24 ha	21.6 ha	Loss
Fragmentation	Very low	Very high	Significant loss
Ecology (Habitat)	Low-very high	Low-moderate	Significant loss
Ecology (Birds)	High (incl pond life)	High	Unchanged
Ecology (Bats)	Nil	Nil	Unchanged
Ecology (Lizards)	Proportional to area	Proportional to area	Loss
Landscape	Moderate	Moderate	Unchanged
Recreation	Moderate (with potential)	Low (disjoint and remote)	Significant loss
Archaeology	Very low	Very low	Unchanged
Aquatic	1845 m of stream	2164 m of stream	Yes, by 17%
Wetland	High	High	Unchanged

Area

Excluding the already conserved QEII blocks from the calculation reduces the area by 9.6 ha (Firth QEII) and 2.87 (Northern Gully QEII), resulting in a small net loss in conservation area.

Fragmentation

The perimeter of the conservation area would increase dramatically. The current boundary with the quarry, from the western edge of Northern Gully down to the eastern intersection with Hebden Crescent is 1.45km long. The perimeter of the proposed boundary would increase by 360%, to approximately 5.25km. The negative consequences of this will be discussed later, along with the significance of the increased fragmentation of the conservation land.

Ecology

When comparing the ecological values in terms of habitat, the POBDA in the current park has a wide range of values from low (pine and grass in the centre) to very high (swamp maire & ramarama populations elsewhere); the corresponding values in the Northern Gully (excluding the QEII part) are low to moderate, and quoted as high in the Southern Gully. (The FoBRP has to take this on trust from the reports, since the FoBRP has not been allowed access to the DoC-get areas). On the whole, given the importance of established 50 to 85 year old and valuable tree species, and their associated wetlands, within the POBDA, the FoBRP considers that the proposal would result in a significant loss in ecological habitat value.

The birdlife values we rate as equally high in both DoC-give and DoC-get. We note that Table 19 in Appendix B1 (Ecological Assessment) scores the Caspian tern and shag species as being in the Firth QEII but not in the POBDA area. Similarly, Table 4 (p25) states that the acoustic recorder AR3 (Lake) was in the Firth Block, whereas in fact the pond where these species were recorded straddles the boundary of both blocks, and the acoustic recorder (AR3) was installed at the boundary fence. We also note that one of the acoustic recorders (AR4) had not been analysed by the time the Ecological report was compiled. We conclude that there would be little change to the avifauna ecological values.

The Lizard assessment (Appendix B2, Table 3) summarises the values of lizard habitat. Including the QEII areas gives a total DoC-get value of 33.19, compared with 18.83 in the POBDA. If the QEII areas, being already conserved, are excluded from the calculation, then the DoC-get value drops to 19.27, only marginally greater than that of the regional park lands. We note that herpetofauna field observations were restricted to the POBDA, and extrapolated to the DoC-get areas based broadly on forest types. Again, we conclude that there would be little change to the lizard habitat values.

Other

We will comment further on the loss in recreation values, wetland and streams in sections 4 and 6.

The proposed land exchange has been discussed and declined twice by DoC, in 2018 and 2022 (see <https://environment.govt.nz/assets/what-government-is-doing/Fast-track-listed/Belmont-Quarry-Development/308.08-Additional-DOC-Feedback-FTA308-Belmont-Quarry-Development-project>). DoC undertook a site visit in 2018 and concluded that the POBDA did not meet the criteria of having “no to low conservation value”; that position was unchanged in 2022. Likewise, the GWRC were also against the proposed land-swap. Since then, the land in question is essentially unchanged, except that we now know that its ecological value is much higher than previously thought.

The confusion over whether QEII lands can be considered is also apparent in the Land-exchange report. In relation to landscape benefits, on p65, it states :

9.61 There is also a net benefit in landscape values in favour of the conservation estate. From a conservation perspective, areas with higher landscape values are more valuable because they are more

*sensitive to change and **require greater protection** to prevent visual impacts arising from their reduced capacity to withstand development. [our emphasis]*

But if some of those areas are already protected, and the quarry is currently consented with the impact on landscape values already managed, the proposed exchange does not add this claimed benefit.

Pivotaly, a recent Cabinet paper (August 2025) on reforming conservation land exchanges (<https://www.doc.govt.nz/globalassets/documents/getting-involved/consultations/2024/modernising-conservation-management/cabinet-material-modernising-conservation-land-management.pdf>), which discussed the exclusions under the Fast Track Act, includes this comment (on p229 of the PDF) :

*100. Conversely, on the other side of the exchange equation, areas of private land or areas of land that are not PCL but have existing sound protection mechanisms in place, such as a conservation covenant, have not been explicitly excluded. **However, they may not be assessed as meeting the net conservation benefit test (given that shifting ownership does not increase the protection for such areas) and would therefore not likely meet the test for land exchange.** [our emphasis]*

Apart from the QE II covenants, a careful check should be made for any other protections for vegetation that exist on the titles of the proposed DoC-Get areas that may originate from conditions of earlier resource consents. Conditions of consent of the existing quarry that manage any adverse effects should also be carefully considered. Presumably those consents have already taken care to prevent adverse effects on the conservation values of the adjoining park.

In summary, the FoBRP maintains that the applicant's inclusion in the comparative assessment of lands that already enjoy full and perpetual ecological protection amounts to double dipping, and presents a false picture of a net ecological gain, whereas a significant loss of conservation values would result in practice.

3. Valuable and threatened species and wetlands would be destroyed

The FoBRP has already made submissions to DoC on the topic of valuable species within the POBDA, so this section will be a brief summary of those points.

Since learning of the Fast-track application in late 2024, the FoBRP has helped coordinate further ecological surveys, which have revealed the presence of valuable species within the POBDA, notably:

- 24 healthy specimens of swamp maire (*Syzygium maire*), status : Threatened - Nationally (and Regionally) Vulnerable
- 23 healthy specimens of Ramarama (*Lophomyrtus bullata*), status : Threatened - Nationally (and regionally) Critical
- Two observations of *Comptosia rubra* and one of *Carex maorica*.
- Perched inland wetland areas which support these populations; these environments are rare.

Swamp maire and ramarama are widely distributed throughout the POBDA and include trees up to 10m tall (see Fig 2). At the time of writing (February 2026) 11 of the swamp maire are fruiting (see Fig 3). The FoBRP has roped off all of these trees to protect their fragile root systems from foot traffic.

Maire tawake / swamp maire / *Syzygium maire*

A selection of maire tawake growing in the proposed overburden disposal area, Belmont Regional Park.

Photos by Dianna Thomson.

Red dots on the map show approximate positions of maire tawake. The representation of watercourses by blue lines is approximate.



Fig 2. Poster showing the extent and nature of the swamp maire trees within the POBDA



Fig 3 : Fruiting swamp maire in the POBDA, February 2026. Manaaki Whenua (https://www.landcareresearch.co.nz/assets/Publications/Te-reo-o-te-repo-vol-2/TRoTR_Kei-konei-tonu-au_Chapter-7.pdf) point out that swamp maire seeds can be dispersed widely (kereru can travel up to 65 km in a day) but can also germinate readily without the assistance of moving through a bird's digestive tract, but that lots of swamp habitat is essential for this to happen.

In late 2025 the applicant revised the POBDA western boundary to exclude one population of swamp maire. The FoBRP regards this as a welcome but token adjustment since (see Fig 2.1 on p3 of the Hydrology

Assessment) the watercourse upstream of the “excluded” swamp maire would still be buried in overburden. As J T Salmon points out (on page 168 *Native Trees of New Zealand*) : “*if the swamp or bog is drained, the tree dies within one or two years.*”. Regardless of the western boundary adjustment, the largest wetland and associated flora (upstream of the pond, in the south-east) would still be destroyed by the proposed overburden disposal.

Aerial photographs dating back to 1941 (available at <https://retrolens.co.nz/>) show streams, gullies and wetlands within the POBDA as dark, ungrazed areas. It is here that seedling and sapling remnants of the original native forest appear to have survived. So for at least 85 years, these areas have provided an ecological sanctuary for Swamp maire, Ramarama and Coprosma rubra. While still young in ecological terms, the ecological value of the established Swamp maire, classified as Threatened-Nationally Vulnerable under the New Zealand Threat Classification System, far outweighs proposals for new plantings which have no guarantee of success.

(A small version of the historic aerial photo can also be seen in Figure 4, page 14 of appendix B1).

The destruction of the stream and wetland upstream of the pond in the southeast corner of the POBDA would, in all likelihood, destroy the ecology of the pond, and the associated rare avifauna. The downstream ecology of the Firth QEII block may also be compromised. The hydrology assessment (Appendix B9) dismisses the importance of this area, as will be discussed in section 6, below.

The FoBRP invited comment from Dr Colan Balkwill, who has recently completed a PhD around swamp maire at Victoria University of Wellington, and is familiar with many of its habitats throughout Aotearoa.

Colan visited the POBDA, and commented : “*I observed healthy swamp maire trees of various ages, at least two of which were likely original and seeded prior to land clearance. These trees are therefore not only of historical value but also harbour a snapshot of the ancestral genetic diversity of the region prior to deforestation. They therefore represent living fossils, and any seed they produce is of high value. The habitat as a whole is well suited to swamp maire and other swamp forest plants.*”

“*Greater Wellington has lost over 95% of its swampland habitat. Any remaining swamps, and the plants they contain, should therefore be considered irreplaceable, and it is hard to envisage how the proposed swap could provide land that is as ecologically valuable as the park land considered for exchange. Of specific note is the site’s relative isolation from other swamp maire remnants, and its ease of access, both which are important components of protecting these trees from myrtle rust. Isolation means reinfection is less likely, and accessibility allows monitoring and control to be more easily carried out by members of the public.*”

All of the currently known swamp Maire are publicly visible on the iNaturalist website; these are the only known swamp maire within Belmont Regional Park, and the nearest recorded population is in Stokes Valley (2.5km distant), on the other other side of the Hutt Valley.

Given these strong and informed observations that reinforce the special value and rarity of these plants and their habitat, the FoBRP consider that they represent one of the more valuable features of Belmont Regional Park, and that economic arguments cannot justify their destruction.

4. Loss of recreation access, and unsuitability of the proposed exchange lands

Under a page title of “Purchase or exchange enquiries”, DoC’s website offers “Advice on acquiring or exchanging conservation land” and then states for exchanges:

DOC administers various provisions in legislation (e.g. Conservation Act 1987 or Reserves Act 1977) under which exchanges of land can be undertaken, each involving different criteria and/or processes.

The land being acquired will attain the status the land being transferred held, it must therefore be suitable for this purpose.

This advice is at:

<https://www.doc.govt.nz/about-us/our-role/managing-conservation/statutory-land-management/purchase-or-exchange-enquiries/#:~:text=Introduction,Contact%20us>

Belmont Regional Park’s core purpose is to provide public recreational access, protect local landscapes and ecosystems, and preserve open spaces between the Hutt Valley and Porirua. It serves as a multi-use area balancing conservation, recreation (walking, biking), and farming, managed by Greater Wellington Regional Council to restore ecosystem health.

Therefore, to be considered for exchange, the DoC-Get areas must offer equivalent recreational opportunities as well as a greater ecological value.

The Recreation assessment by Greenaway & Associates (Appendix B4) presents a shockingly inaccurate description of the recreational values of the POBDA. It states that the POBDA’s main recreation feature is a 400m section of 4WD pylon access track, that duplicates part of the Buchanan Road tramping track, and that “No recreation activities were recorded on the OBDA beyond that utilities [4WD] track, and that the recreation value beyond the track was considered ‘insignificant’”.

In fact, the POBDA contains a rich network of trails that are frequently in use by the public. Many of these routes are pest control lines that provide access right across the POBDA, which are linked together by well-marked connecting paths. The contribution and value of the much-discussed 400m section of 4WD utilities road is indeed negligible.

The Recreation assessment is based largely on data from a social media app (Strava), and on online notices by local tramping clubs. The assessment appears to be oblivious to the off-track usage by the public within the POBDA and, for example, of the 12 botanical trips since July last year. These trips do not feature in online advertisements, and although Strava might be frequently used by athletic (biking, running) activities on the main track (ie, north of the POBDA), it would have little or no usage for off-track tramping and exploration.

The recreational value of the POBDA could easily be increased. DoC and GWRC have expertise in creating interpretative signs and panels. As DoC’s Interpretation Handbook records, ‘interpretation is fundamental to the Department’s fostering of recreation, heritage, understanding and engagement in conservation.’

The flat top of the POBDA is an ideal location, in the middle of the track up Boulder Hill, for interpretative signs or panels about both swamp maire and a historical feature at a newly recorded archaeological site. ArchSite is the national database of recorded archaeological sites in Aotearoa New Zealand, and ArchSite record R27/910 is an early 1900s farm building visible near the centre of the POBDA. The historic site and surrounds are the remains of a farm building, with a concrete floor and nib wall, macrocarpa trees, a strainer fencepost and a patch of flowering daffodils, well-known to some Hutt Valley residents.

The proximity of the Dry Creek entrance to public transport (Manor Park station) and the popularity of the campsite at the Dry Creek entrance also contribute to making this a valuable recreation resource for the greater Wellington area.

Table 1 (p5) of Appendix B4 merely lists the existing recreation value of all areas as “Nil” excepting the 400m of 4WD track at the north of the POBDA, and future recreational value of all DoC-Get areas as “Low”.

In section 9.70 (p74) the Land Exchange Report states that “*The four DOC-Get areas are better suited to creating recreational opportunities, given the presence of remnant indigenous forest.*” **This could not be further from the truth.** While the Firth block contains parts that would be good to open more to public access, the block would be impossible to access, given the proposed quarry activities to the north, and that access from Hebden Crescent is dangerously steep for the pest control contractors, and utterly impractical for normal public access. The Northern Gully would be similarly difficult to access as part of the park, as it would require a new and long route to skirt the boundary of the POBDA, with no possibility of a round trip. Southern Gully could be made accessible to the public from Liverton Road, but that would only access a small area, disjoint from the existing park, and would require further land exchanges and a new park entry point.

We note that GWRC are not interested in taking on the responsibility of creating new access paths. Nevertheless, other parts of the Park support a rich network of community trails, which provide an invaluable and well-used resource for the Belmont and Kelson communities. There is great potential for a similar initiative here, which could give a circular walkway that incorporates the regenerating ridges, the tranquil pond (Fig 4), the associated wetlands and taonga species. This would add a superlative recreation resource to the regional park for the local communities, and thus fit well with the purpose of the park.



Fig. 4 : Pond at the southern boundary of the POBDA, arguably one of most beautiful features of Belmont Regional Park.

In terms of the impact on the existing recreation routes outside the POBDA, obviously the quarrying activities would create significant noise, visual pollution and dust. 40% of the Buchanan Road tramping track would have line of sight and spoiled views as a result of the proposal (Fig 5).

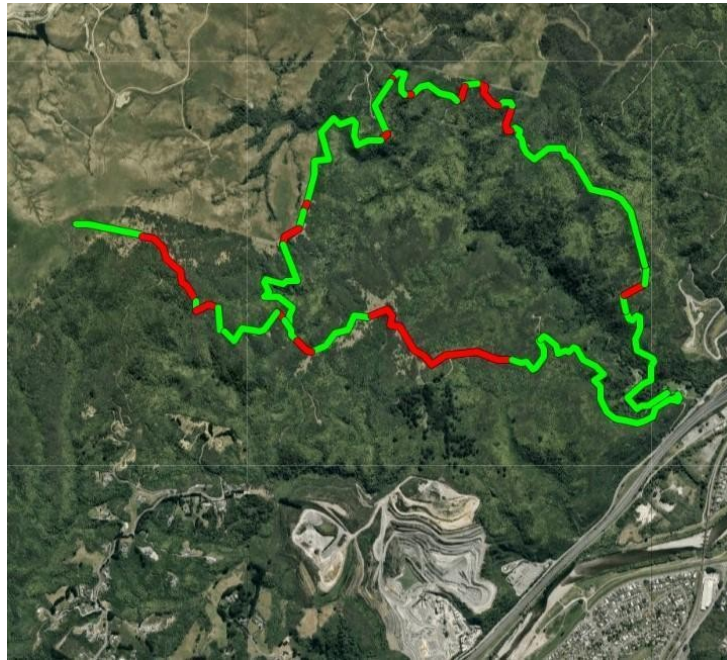


Fig 5 : 40% of the main recreation resource in the park would have spoiled views

Policy 3.3.2.5 of The Wellington Conservation Management Strategy (CMS) 2019 states the need to:

Avoid, or otherwise minimise, adverse effects on the qualities of peace and natural quiet, solitude and remoteness in places where this is an important feature and expectation of the visitor experience.

Clearly, the proposed land exchange and consequent quarrying operations would contravene this guideline.

The FoBRP take a long-term view, that the lands within the POBDA are a valuable resource for the people of the Hutt Valley, and that the current recreation value of the POBDA is high, with the potential for future enhancements that would hugely benefit the local communities. The FoBRP also maintains that the lands proposed for the exchange cannot be used for recreation, as the current park land (POBDA) certainly is, and that the land proposed for exchange is therefore not suitable.

5. Effect of fragmentation of the conservation lands

This part of Belmont Regional Park is part of a Key Natural Ecosystem (KNE), and forms part of a vital ecological corridor connecting native forest fragments in the western hills of Lower Hutt.

The proposed land exchange would remove about 23.5 ha from that KNE, but the greatest impact would be that, although the overall area of conserved land would remain roughly unchanged, the perimeter between the regional park and the quarry lands would increase by a factor of 3.61, from 1.45 km to 5.25 km. (That is the increase in plan distance; the actual boundary increase would be greater, given the topographic changes along it). DoC have already raised this as a significant problem (see Appendix C3, page 8) :

“there does not appear to be consideration that the OBDA + setback area is one intact square-shaped block, whereas the other 3 blocks are not physically connected and have awkward, long shapes with high perimeter:area ratios. This is important for fauna and ecology generally, as island biogeographic theory states that larger areas can support more diverse range of species. In addition, the connectivity

of the OBDA to other larger areas of native habitat does not appear to have been considered in the scoring system”.

A longer perimeter will greatly amplify the “edge-effect”, whereby the conservation values near the edges of conservation land are depleted over time through incursion of invasive weeds, pest animals, and (for example) airborne pathogens, such as myrtle rust. This effect is already pronounced and obvious along the current POBDA boundary with the quarry.

In fragmented landscapes, edge effects can dominate the entire area, leading to significant loss of habitat for species that require undisturbed interiors. A Nottingham Trent University study (March 2025) suggests that fragmented landscapes have 12.1% fewer species than unfragmented ones (<https://www.ntu.ac.uk/about-us/news/news-articles/2025/03/want-to-preserve-biodiversity-go-big,-researchers-say>).

A longer perimeter would also provide more workload for the new land-owner, which could be at odds with section 18 of the FAA, section 3c, which states that the report from DoC to the panel must assess “*whether the consequences of the land exchange would be practical to manage on an ongoing basis, including consideration of whether the land exchange would result in an enclave of private land within a conservation area*”.

Although the proposal would not entirely land-lock the then privately-owned POBDA, it would create a geometry which is all but land-locked, with the DoC-Get areas physically remote and stretched away from the existing conservation lands.

Because of their QEII status, the Firth and Northern Gully established forest areas are currently part of the wildlife corridor between the regional park, the Hutt Valley and the great extent of native forest further east. Importantly, they are contiguous with the conservation KNE within the park, but the proposed land exchange and subsequent quarry activity would sever this wildlife corridor.

As mentioned above, the park fragmentation would also have a significant effect on recreation values, because of the loss of approximately 23.5 ha of park land with no recreation redress.

We have said little about the relative values of the old Dry Creek clean-fill site, NW of the Haywards Intersection. From a recreation perspective, it is clear from Fig 5 of the Land exchange report (p 21) that the area offered by the applicant gives no recreation advantage, being steep-sided bush, adjacent to retired quarry workings, and off to one side (east) of all other recreational activity in the park. The exceptionally weedy nature of the old quarry site and its proximity to the proposed exchange block, along with the distance from the rest of the park, suggest that little or no ecological value would be gained from this part of the proposed exchange.

Moreover, the state of the abandoned Dry Creek quarry workings - full of weeds, including uncontrolled pampas grass and buddlia - brings into question the applicant’s true commitment and ability to protect the environment, and begs the question as to what condition the applicant would leave the POBDA in after the overburden disposal had been completed. Section 26 of the FAA also states that the Director General of Conservation must address the matter of any legal or financial liabilities resulting from the land exchange. The FoBRP contends that, without a very significant financial bond lodged with the department, the possibility that the applicant (or the parent company, Fletcher Challenge) becomes insolvent after overburden work has commenced, would leave the region with an ecological and financial liability.

6. Impact on hydrology

The Hydrology assessment can be found in Appendix B9. It claims that the POBDA area only contains intermittent and ephemeral streams, ie, that there are no streams that flow continuously. This seems to be based to a large extent on what is depicted on the LINZ topographical maps, and Strahler stream order in combination with a digital terrain model, rather than by repeated field observations. LINZ topographical maps are known to show watercourses where none exist (eg on karst landforms), and they are not intended to provide a reliable source of hydrological information.

Consequently the Hydrology assessment significantly undervalues the importance of the stream courses within the POBDA. In particular (p8) *“The [LINZ’s topographical map] shows no streams in this area (Figure 2.5). Consequently, there is likely to be only limited surface flow in the proposed OBDA. The existing rainfall-runoff relationships, and patterns and characteristics of drainage, will be retained during any land exchange”*. This is simply incorrect: members of FoBRP have been visiting the area over the past 20 years and have never seen a lack of flow in the stream that feeds the wetland supporting swamp maire and ramarama, upstream of the pond. These observations over a long period of time are unique to community members, and not something a desktop survey could hope to capture. **Perennial streams definitely exist within the POBDA, and they must be accounted for in the application.**

This is illustrated in Figure 2.5 (p8 of Appendix B9) : A dashed red region is used to vaguely indicate the area of *“the proposed OBDA and the lack of any streams shown in this area”*. The lack of care and attention in this assessment is, frankly, appalling.

This point is important, because this stream feeds not only a rare uplifted wetland, but also flows into the Firth block, immediately downstream. Burial of this stream, and consequent addition of fines and soil particulates into it, would adversely affect the QEII-protected lands downstream. This would presumably contravene the terms of the Firth Block QEII covenant.

On page 98 of the Land exchange report, Table 31 lists regulations that apply, and Regulation 53 (of the National Environmental Standards for Freshwater) prohibits drainage of a natural inland wetland, with the applicant comment on page 99 that *“That is not proposed here. The NES-F prohibitions do not apply”*.

However the plans (eg Fig 4, p19 of the land exchange report) clearly show that their OBDA area includes half of the pond and all of the valley upstream of it. That is a natural inland wetland, and presumably must therefore be protected.

After the initial discovery of 14 swamp maire within the POBDA, the applicant brought the western boundary eastwards in an attempt to mitigate the impact, ostensibly by avoiding the swamp maire. However the submitted plans (eg Fig 2.1 on p3 of the Hydrology Assessment) show the catchment upstream of these trees to be within the POBDA, and if the hydrology in this gully is modified, this grove of swamp maire could be expected to die within one or two years, as was explained in section 3 above.

The FoBRP concludes that the Hydrology assessment grossly misrepresents the actual hydrology of the POBDA, and cannot be accepted as a true assessment of the current situation, or the likely impact of the application.

7. Conclusion

The Friends of Belmont Regional Park is an incorporated society, formed in 2002. Our primary purpose is to ensure the future integrity of Belmont Regional Park, and its protection in perpetuity for the use and enjoyment of present and future generations. Our involvement in this issue directly represents one of our objectives, which is to *'lobby and draw public attention to any issues which affect the well-being of the Belmont Regional Park'*. We act as an umbrella group for local communities and organisations, and our organisational members include the Korokoro Environmental Group (KEG), Pest-Free Puke Ariki, and the Pareraho Forest Trust - who have entrusted the FoBRP to speak to this issue on their behalf. We have also engaged with the Hutt Valley Tramping Club and Forest & Bird to highlight the quarry proposal. Our other activities in recent years have included securing funding for pest control in the park, and working with GWRC on future planning to replace farming. The FoBRP has a long-standing and intimate relationship with this land; as a result, both the owner (DoC) and manager (GWRC) of the land regularly consult with the FoBRP to guide the management of the park.

The FoBRP is grateful, therefore, for the opportunity to comment on the proposed land exchange, as we are well-suited to review the various assessments and reports, some of which are clearly derived from a brief and superficial acquaintance with the land, and many of which contain misleading and incorrect data and conclusions.

One of our key findings is that the POBDA contains irreplaceable ecosystems and threatened tree species that were not known before the application was conceived. The applicant's argument supporting net ecological gain is rooted in incomplete and unreliable data, and current knowledge shows it to be false.

Based on the information presented above, the FoBRP is of the firm belief that the proposed land exchange cannot provide a net gain to conservation lands, but would in reality result in a significant net loss in conservation values, and a significant loss in recreation values. The assessments into recreation and hydrology in particular are woefully inadequate, and do not accurately represent the value of the park lands desired by the applicant. The ecological assessments include already protected conservation lands to bolster the value of the exchanged lands, and the proposal would destroy 50 to 85 year old swamp maire populations in exchange for a re-planting programme with no guarantee of success. The proposal would dramatically fragment the existing regional park boundary, and significantly decrease the ecological values of the area in the process.

The proposal would provide short-term economic gain for a private company, at the expense of public recreation and conservation for generations to come.

The FoBRP respectfully requests the Director General and the Department to advise the Fast-track panel that the application is not for the good of New Zealand or New Zealanders, and does not meet various applicable criteria for land exchanges to be approved..

However : if the application were to proceed, the view of FoBRP is that - at the very least - the OBDA eastern boundary be brought west by about 200m to fully protect the pond and the full catchment of the shallow valley and wetland upstream from it, and so protect the swamp maire and ramarama populations in that valley. That would also protect the area containing the Ngahere gecko population, and potentially provide future recreation access to the forest in the QEII Firth block.

Furthermore, the FoBRP would strongly request that, if a land-exchange were to be approved, that the actual exchange would not be executed unless the substantive application were also to be successful.

Also, the land exchange report states that the *"DOC-Give land areas are zoned as a General Recreation Activity Area within the HCC Operative District Plan and as a Natural Open Space Zone within the Proposed Lower Hutt District Plan 2025."* If the exchange proceeds, there should be a condition that the applicant seeks a plan

change to apply these provisions to the DOC-Get land, so that it does not have less protection than the "DOC-Give" land.

Finally, the FoBRP will be happy to discuss these issues further with DoC, and would be grateful for the opportunity to guide department staff through the POBDA area at any time, should they so wish.