

Response to comments on draft Belmont Quarry land exchange report

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Date:	30 June 2026

1. Introduction

This is a response to the comments received on my Statement of Advice (dated 28 May 2026) regarding the proposed land exchange for the Belmont Quarry Fast-Track application.

2. Response to comments from Winstones

2.1. Technical memo on Lizards by Tony Payne (Blueprint Ecology Ltd)

Mr Payne has responded to my earlier Statement of Advice. The main criticism Mr Payne provides about my Statement is my view that more work could have been done to further understand the density of lizard species in each land parcel. I acknowledge that Mr Payne had practical constraints of time, and I consider the survey work he did within that time to be appropriate and prioritised at the 'DOC Give' site, using suitable methods.

Mr Payne also contests my suggestion that he could have, in addition to the methods used, also used closed cell foam covers to better detect geckos. He reasonably points out that the 'DOC-Give' site only has relatively small trees, and the closed cell foam method requires large trees. I think this is a reasonable assumption. However, I think the method could have been adapted to make smaller closed cell foam covers that would have fitted on the smaller stature trees. My suggestion also included using this method at all the 'DOC-Get' sites such as the Northern Block and Firth Block, which do contain mature large trees that would be suitable for this method, using the standard-sized closed cell foam covers. This would have required more resources (effort and time) than Mr Payne was able to devote to this survey.

The feasibility and effectiveness of ground pest control is questioned. However, I consider this to be a relevant factor, due to:

- (i) ground-based animal pest control is currently occurring in the 'DOC-Give' area, so benefits to terrestrial native fauna should have accrued at this site

- (mainly birds – as lizards are constantly highly vulnerable to predation by introduced mammals), and will continue if this pest control is maintained;
- (ii) the applicant has offered that pest control should occur over the ‘DOC-Get’ sites, so raising the feasibility of achieving this in practice, is relevant.

2.2. Technical memo by Graham Ussher

Section 3 – I agree with Dr Ussher that a 20-year pest control timeframe would result in better ecological outcomes for the sites. As Dr Ussher describes, the applicant should declare what they are trying to achieve at each site (e.g. condition or ecological integrity at each site), and from there decide the appropriate management timeframes that are most likely need to achieve these.

Section 4 – Dr Ussher criticises DOC’s approach to scoring the land parcels, and concludes that DOC has, in part, not taken into account the size of each parcel. In my Statement of Advice for Terrestrial fauna, I did take into account the land parcel size – this was mentioned in the text of the various tables in that report. I agree with Dr Ussher that the DOC approach is less qualitative than the BlueGreen Ecology approach, making aspects such as land parcel size less obvious in the DOC assessment. However, I think the BlueGreen Ecology approach is not perfect either. For example, it assumes a linear increase in value for each condition score, which is unlikely to be true ecologically (I consider the direct relationship is essentially unknowable due to the complexity of ecosystems, but is more likely to be exponential than linear). The DOC approach could potentially be seen as more holistic (compared to more reductionist for the BlueGreen Ecology approach), with more reliance on expert opinion that takes into account a range of scoring for a number of conservation values.

Section 5 – my understanding is that if the QEII sites are discounted, the assessment does not include values protected by the covenant.

The pest control (possum control only) offered in the 13ha of Package B in Belmont Regional Park, will, in my opinion, provide no additional benefit to the conservation values of this site. This is because possum control is already occurring at this site (by Greater Wellington Regional Council (GWRC)), so this offers no additional benefit. Dr Ussher states that this possum control alone will provide benefits to native birds and lizards. However, without control of ship rats (and ideally mustelids), I consider the outcomes for these species by possum control only will be negligible. Although rat control over this 13 ha is currently undertaken by GWRC, I consider any benefits to native birds and lizards would largely be due to GWRC efforts, so I don’t believe that Winstone’s can legitimately claim this additionality as resulting from their efforts.

2.3. Technical memo by Dr Hazel Burrridge (bats)

I am satisfied with the explanation provided by Dr Burrridge, and have no further comment.

2.4. Winstones Improvement Package A

2.4.1. Improvements offered

Package A proposes measures to undertake and measure mammalian pest management in 3 blocks (Northern Gully, Southern Gully and Firth Block).

Possum control is suggested at 2 per ha at both Northern Gully and Southern Gully). However, as the blocks are so small, I consider this is inadequate. In my opinion, there should be a possum trap every 50m along the boundary of these blocks, and then a grid of 50m internally between traps. The table also doesn't indicate how many times the traps will be checked, reset and rebaited each year. I consider this should happen once per month (12 times per years).

For the Northern Gully, rats are also listed as a target species, but no method or target is shown. In my view, the method should be bait stations set on a 50x 50m grid, plus 50m spacing around the perimeter – i.e. similar to my proposed possum setup above.

The rodent control area in the Firth Block is not specifically defined, and should be a minimum of 50 x 50m, with 50m spacings along the perimeter. Traps are proposed to be used, however I consider that only self-resetting traps should be used to provide greater confidence in being able to achieve a result that is likely to benefit conservation values. These traps only need to be checked every few months, reducing the labour cost of servicing non-resetting traps.

2.4.2. Conditions

Condition 28 (Table 3): outlines the proffered mammalian pest control management. However, no quantitative targets are offered. The column 'Response trigger' is a qualitative target; it is neither a trigger level nor a response that will be invoked if a target is not achieved. In addition, the method by which observations will be made by a contractor are not provided, so the suitability of this approach for each pest species cannot be assessed. The suggested 'Response trigger' in Table 3 doesn't follow any best practice or standard methodology, and doesn't try to measure the

crucial element of best practice pest control monitoring – the number of animal pests remaining, i.e. those pests that have not been killed and continue to do damage to terrestrial fauna values at the site.

Overall, I consider the proposed animal pest targets and response if any targets are not achieved are not satisfactory. This is because there is uncertainty that any conservation values affected by mammalian pests will achieve any substantive beneficial outcomes.

Condition 39: 10 Working Days is not sufficient. In my view, this should be at least 30 Working Days to provide greater certainty that DOC can adequately find resources in future to consider any changes to the plan. Any DOC time used to consider any changes to plans should be cost recoverable by DOC.

Condition 43: any contamination should also be assessed for potential adverse impacts on native fauna, not just human health requirements.

2.4.3. What is the conservation value rating of Package A

For the Mammalian Pest Management Plan there are no reliable specific, measurable targets, no trigger thresholds if targets are not met, and no additional measures provided if thresholds are breached.

2.5. Winstones Improvement Package B

2.5.1. Improvements offered

Package B offers, in addition to Package A, planting and pest control in the Belmont Regional Park. The main potential benefit that this package offers for terrestrial fauna is possum control for 10 years over 13 ha within Belmont Regional Park. However, the purpose of the possum control is to assist the successful establishment of swamp maire and ramarama, so there are no specific benefits aimed at terrestrial fauna with Package B.

2.5.2. Conditions

Condition 26: offers the Mammalian Pest Management Plan 20 days before settlement. In my view, this should be 30 Working Days to provide greater certainty that DOC can adequately find resources in future to consider any changes to the plan. Any DOC time used to consider any changes to plans should be cost recoverable by DOC.

Condition 29: same comments as Package A – Condition 28.

Condition 40: any amendment change to the Plan should allow at least 20 Working Days for DOC to respond. This will provide greater certainty that DOC can adequately find resources in future to consider any changes to the Plan. Any DOC time used to consider any changes to plans should be cost recoverable by DOC.

Condition 41 (b): reducing pests over a calendar year is not usually how animal pest populations work. They generally increase in spring/summer as breeding occurs, and naturally decline over autumn/winter as resources become scarcer. In my view, having a regular (calendar-based) monitoring regime with targets and thresholds above which further management actions are triggered, is more appropriate than showing there is a decline over a calendar year (i.e. between January and December).

Condition 45: any contamination should also be assessed for potential adverse impacts on native fauna, not just human health requirements.

2.5.3. What is the conservation value rating of Package B

Low. In addition to Package A, only possum control is offered over 13 ha. No residual possum targets have been set and no triggers are listed to compel additional measures if targets are not achieved. As in Package A, the ‘measurable objective or outcome’ are uncertain, inadequate and not standard practice.

3. Discussion

There is already control of possums using toxic bait in bait stations at the proposed 13 ha site offered in Package B (in addition to rat control by the same measure and mustelids by trapping) by Greater Wellington Regional Council (GWRC) as part of a much larger area of animal pest control (Fig. 3 in my Statement of Advice). Unless it is known that GWRC intend to discontinue this pest control, I consider there would be little to no benefit to terrestrial fauna in further possum control taking place within the 13ha site.

The use of 26 ‘Flipping Timmy’ traps over the 13ha will kill some additional possums, particularly over the winter period when bait stations are not having toxic bait deployed. However, most terrestrial fauna (particular birds) are not known to be

vulnerable to possums during the winter season when they aren't nesting, so I do not consider any additional benefit to birds will accrue.

The effectiveness of the Flipping Timmy traps is also dependent on the frequency with which they are checked, rebaited, relured and reset, which hasn't been described in the proposed Conditions.

After considering the responses of the applicant to my Statement, I consider the conservation values outlined in my Statement following implementation of the offered improvements, would not change with the implementation of Package A and B.

4. Recommendation

Condition 27 (Package A) and Condition 28 (package B) – needs to state the measurable targets for each pest species. In my view, these are fundamental and so should be in the conditions, as relying on yet to be developed management plans means there is uncertainty of conservation results and outcomes.

Table 3 (in Conditions of both Packages) needs to be amended to clearly show:

- a. measurable pest control targets (using suitable methods) for each pest species that will likely result in conservation gains for native species at the land parcels
- b. threshold triggers; and
- c. additional measures to be deployed if thresholds are breached.