

Addendum

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Attention: Jade Wikaira

Company: c/- Winstone Aggregates

Date: 3 March 2026

From: Rhys Girvan (Registered Landscape Architect)

Message Ref: Belmont Land Exchange

Project No: W15069

This addendum should be read in conjunction with the Landscape Assessment supporting the proposed land exchange, dated 1 December 2025. The purpose of this addendum is to respond to comments received from the following parties in relation to landscape and visual matters which relate to the proposed Belmont Quarry Overburden: Land Exchange:

- Friends of Belmont Regional Park
- New Zealand Conservation Authority
- Wellington Conservation Board

This addendum was prepared by Rhys Girvan, Senior Principal Landscape Planner and primary author of the Landscape Assessment. This addendum has been prepared in accordance with the Environment Court Practice Note 2023 (Code of Conduct for Expert Witnesses) and complied with that Code. A Curriculum Vitae of the primary author is included in the previous Landscape Assessment. Detailed matters relating to ecology, recreation, planning and cultural values are addressed in other respective technical reports.

Comment Received	Landscape Response
Friends of Belmont Regional Park	
<p><i>“Reason IV: The proposed application would severely fragment the park</i></p> <p><i>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, incursion of invasive species and a generally poor ecological outcome. The applicant has been made aware this problem (Appendix C3, pB) but there is no way of mitigating it.”¹</i></p>	<p>From a landscape perspective, the DOC-get land is not a series of isolated fragments. It includes part of the former Dry Creek Quarry and three contiguous vegetated areas (Northern Gully, Southern Gully and Firth Block) that adjoin Belmont Regional Park and straddle the existing quarry boundary.</p> <p>These parcels align with legible gully and spur landforms on the Western Escarpment and, because they include land that is more prominent in wider views, their inclusion within the Conservation Estate strengthens the continuity and integrity of a coherent vegetated</p>

¹ Friends of Belmont Regional Park, page 4

	<p>escarpment backdrop. By comparison, the proposed OBDA area forms an internal edge location immediately adjacent to the established quarry within a transitional and already modified setting.</p> <p>Concerns about perimeter-to-area ratios, weed incursion and ecological fragmentation are primarily ecological matters and are addressed through the ecological assessment and proposed management measures. Notwithstanding this, the landscape assessment has considered coherence and capacity at the broader landscape character area scale and concludes the exchange would strengthen the conservation estate's landscape and visual fabric while continuing to consolidate potential quarry-related disturbance within a relatively contained area of landscape.</p>
<p><i>"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:</i></p> <p><i>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]"²</i></p>	<p>The landscape assessment compares the underlying landscape values (physical, perceptual and associative attributes) of the land proposed to be exchanged. This evaluation is independent of the particular protection mechanism currently applying to parts of that land (for example, a QEII covenant).</p> <p>QEII covenant status is relevant context because it can indicate recognised values and existing stewardship, but the assessment's conclusions are driven by the comparative landscape value, visibility, sensitivity and capacity of the exchange areas.</p> <p>If the exchange proceeds, the acquired land would be managed within the relevant conservation and/or reserve framework. Any administrative changes to covenant status do not alter the landscape attributes that have been evaluated.</p>
<p><i>"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).</i></p> <p><i>Policy 3.3.2.5 of The Wellington Conservation Management Strategy (CMS) 2019 states the need to:</i></p> <p><i>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.</i></p>	<p>It is important to distinguish between the land exchange itself (a change of tenure) and any subsequent substantive application to develop and operate an overburden disposal area. The land exchange does not, of itself, create physical change, noise, dust or other operational effects.</p> <p>Potential effects on recreation experience (including peace and natural quiet) from future quarry/OBDA operations will be assessed as part of the substantive application, alongside relevant operational controls and mitigation (for example, setbacks, buffers, staging and rehabilitation).</p> <p>Regarding visibility, the DOC -give land was assessed via the ZTV mapping provides theoretical visibility based on bare-ground topography to inform my assessment of landscape values. This was checked against field observations, which confirm that existing landform and established / regenerating</p>

² Ibid, pages 7 and 8

<p><i>Clearly, the proposed land exchange and consequent quarrying operations would contravene this guideline.</i>³</p>	<p>vegetation provide substantial local screening. From Buchanans Road Tramping Track, visibility of the DOC-get land is assessed as partial and generally short-duration, with the track increasingly enclosed by vegetation through this part of the park.</p>
<p>New Zealand Conservation Authority</p>	
<p><i>“The parcels of land in the DOC-Get offer are not contiguous. In the case of the Northern and Southern Gully parcels the DOC-Get land is adjacent to a number of rural residential properties in private ownership. The land designated as DOC-Give (to be the Overburden Development Area – OBDA) is surrounded on 3 sides by the Belmont Regional Park and the fourth side shares a boundary with the existing quarry.”⁴</i></p>	<p>While the DOC-get land is not a single cadastral block, it comprises three contiguous vegetated parcels (Northern Gully, Southern Gully and Firth Block) plus part of the former Dry Creek Quarry, each of which adjoins Conservation land, (Belmont Regional Park).</p> <p>From a landscape perspective, the key outcome is that the exchange consolidates the management of prominent vegetated spurs and gullies along the Western Escarpment that form an important backdrop to views from the Hutt Valley. Where parts of this land are already subject to mechanisms such as QEII covenanting, transfer into the Conservation Estate still provides value by bringing these areas under a single, enduring land manager, enabling consistent escarpment-wide stewardship (e.g., weeds/pests, track/access management, and coordinated restoration), and reducing fragmentation and reliance on future private-owner decisions. This provides greater certainty that the existing character and backdrop values will be maintained and enhanced over time.</p> <p>The adjacency of some parcels to rural-residential properties reflects an existing edge condition. Bringing these vegetated areas into the Conservation Estate can further reinforce a stable vegetated interface between residential areas and existing quarry activity and support consistent management of the escarpment backdrop. The DOC-give land proposed to be transferred to Winstone is immediately adjacent to the existing quarry and has been assessed as having moderate landscape value with relatively contained visibility in the broader landscape setting.</p>
<p>Wellington Conservation Board</p>	
<p><i>The Board notes that a detailed ecological assessment report (“Belmont Quarry Land Exchange: Overview of Ecological Values”, BlueGreen Ecology Ltd) has been prepared to support the application. The report identifies ecological values within both the proposed exchange areas and the overburden disposal site,</i></p>	<p>The landscape assessment has already considered the exchange at a landscape character area scale (Belmont Hills and Western Escarpment) and treats landscape as a connected, integrated environment where changes in one area can influence wider patterns, views and the sense of openness / enclosure.</p> <p>In this context, the exchange results in a slight increase in visible land and waterways along the</p>

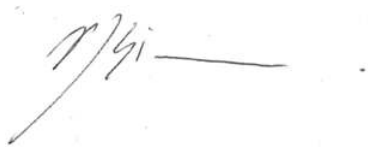
³ Ibid, pages 12 and 13

⁴ New Zealand Conservation Authority, page 5.

<p><i>and outlines proposed mitigation and restoration measures.</i></p> <p><i>While acknowledging this assessment, the Board believes that several broader issues have not been adequately addressed. We believe that landscape-scale ecology within the park, and surrounding catchment, would be helpful in considering the overall conservation impact of the proposal.</i></p>	<p>Western Escarpment to be incorporated within the Conservation Estate, strengthening the continuity of vegetated gully and spur systems.</p> <p>Landscape-scale ecology matters are principally addressed through the ecological assessment. However, the land exchange also creates practical opportunities to deliver integrated landscape and ecological outcomes (for example, riparian and wetland restoration, weed and pest management, and managed recreation access) across the exchanged parcels to ensure the anticipated conservation benefits are realised.</p>
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Based on the above, no material change in landscape values have been identified which are assessed as representing a net landscape gain based on the proposed land exchange. The findings of my original Landscape Assessment, dated 1 December 2025, therefore remain valid.

Yours sincerely
BOFFA MISKELL LTD



Rhys Girvan
Senior Principal: Landscape Planner