

Response to comments on draft Belmont Quarry land exchange report

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1. Introduction

I peer reviewed the Applicant's 1 December 2025 Landscape Assessment prepared for Winstone Aggregates which included a site visit with Rhys Girvan – author of the Landscape Assessment on 24 March 2026. I prepared an Advice Statement for the Department of Conservation (DOC) dated 26 May 2026 and have read Mr Girvan's response to that document. I have also read the Friends of Belmont Regional Park's (FoBRP) comments, the Landscape Dynamics hydrological technical memorandum and the Applicant's Planner's comments on DOC's draft report concerning the land exchange. I comment on several matters below.

My qualifications and expertise, and agreement to comply with the Environment Court's Code of Conduct for Expert Witnesses, is set out in my 26 May 2026 Advice Statement for DOC.

2. Response to comments from Friends of Belmont Park

FoBRP note that the Applicant's landscape assessment and my advice statement to DOC do not consider the proposed changes arising from future quarrying activity, should the land exchange be approved. The scope for this current phase of reporting specifically excluded the substantive proposal which will be addressed comprehensively at a later date through additional landscape effects reporting by the Applicant and DOC peer review. I acknowledge FoBRP's observation that why then are the proffered improvements to the DOC-get areas included for consideration now as these also include future changes and only if the land exchange is approved. I address this in my **Table 2** where I include a separate column with the various landscape values of each block assessed '*where the proffered improvements are successful*'. This also includes a rating where the OBDA is left unchanged but will naturally improve over time through normal ongoing weed and animal pest control as currently occurs. Otherwise, I assess the overall landscape value (without improvements / in the various blocks' current state) in a separate column in Table 2.

FoBRP question the Applicant's assessment regarding the current visibility of the DOC-Give block / OBDA. I rely on the ZTV mapping prepared by the Applicant (24 April 2026 Graphic Supplement **Figure 4**, prepared by Boffa Miskell). ZTV mapping does not account for screening vegetation, of which much would be present where

the mapped areas of theoretical visibility are shown. Figure 4's mapped theoretical visibility (across the wider area, including the Regional Park) is rated by the Applicant as 'Low-moderate' which in my opinion is fair. Most of the area appears to overlay inaccessible / unsettled / heavily vegetated areas which in addition would likely preclude any limited outward views.

If track users in Belmont Regional Park were assessed as a separate party, it may be that the visibility of the OBDA for this group would be proportionally greater, and a higher rating than Low-moderate may be concluded - the OBDA land parcel may well be 'Moderately' visible from 40% of the most well-used track in the Regional Park as FoBRP state. This seems fair on the face of things, looking at the photographs in the FoBRP comments report. The Applicant's Figure 4 shows these tracks passing through areas of theoretical visibility.

However, I have not walked all of these tracks, so cannot confirm the visible extent of the OBDA where screening vegetation is absent providing views.

In their comments report at Figure 4, FoBRP put forward an alternative reduced extent for the OBDA. While I agree that this would reduce adverse effects on landscape and natural character of the substantive changes should the land exchange be granted, I understand that revising the extent of the land parcels is beyond scope now.

3. Response to comments from Winstones

3.1. Planning memo

I have read the JW Wikaira Consulting 15 June 2026 Memorandum. Landscape matters are briefly summarised at 5.1.6. I have no comment on the planner's points and comment on any outstanding landscape matters in detail in the following section.

3.2. Technical memo – Hydrology

I have read the Landscape Dynamics Ltd 12 June 2026 Technical Memorandum which provides some additional technical information. I understand that the Panel will need to determine what test applies under the FTAA, and whether that means the values I have described are effectively discounted.

I have no comment on this report other to state that in my opinion and regardless of the application of the legal test, the natural values of the land parcels remain, irrespective of whether there is a QEII covenant over them or not.

I also note that the various metrics for the various DOC 'Get' blocks are not separated out in the hydrology memorandum. As such, my conclusions reached regarding overall landscape value of the various blocks will not alter, given the seven-point scale I've used in my own assessment.

3.3. Technical memo on Landscape by Rhys Girvan (Boffa Miskell)

Mr Girvan's findings in his original 1 December 2025 Landscape Assessment and the findings in my subsequent peer review following a site visit and later Advice Statement for DOC broadly align. As such my comments below will be brief.

Mr Girvan has helpfully included additional material in his revised 24 April 2026 Landscape Assessment ('Rev A') which includes the outlines of the various land parcels on his site photographs, additional quantifiable material relating to physical elements of each block, and a summary table. This helps describe the various land parcels and their visibility.

Mr Girvan acknowledges my Advice Statement for DOC noted that edge effects, weed and animal pest eradication and ongoing control were not addressed in great detail in his Landscape Assessment. Mr Girvan notes in his response statement that better protection against 'edge effects' can be achieved through '*strengthened conditions and clear management obligations*' which partly relies on the Applicant adopting DOCs additional conditions in the consent package should the land exchange be granted. I agree with and support Mr Girvan's recommendation but note that edge effects will prevail to a degree. The measures do not promise to eliminate edge effects.

Edge effects are also noted by Mr Girvan as relevant '*where future physical changes create new edges (and effects)*'. However, in my opinion edge effects also apply where there is no physical change too - particularly in three DOC-Get land parcels (Dry Creek, Northern Gully and Southern Gully) which are adjacent to weed and animal pest sources and have a larger edge to core ratio. In my opinion this must be reflected in their overall landscape values. Following the land exchange (if successful), these land parcels will continue to be exposed to weed and animal pest invasion which needs to be recognised with robust conditions put in place. Some threats will continuously come from neighbouring land which is outside the Applicant's control.

The Dry Creek land parcel is noted by Mr Girvan in his response statement as "...*best understood as a restoration and consolidation opportunity*". This goes beyond the description of current landscape value. Or in other words, 'restoration opportunity' shouldn't be conflated with current landscape value.

Mr Girvan discusses the relative value of the QEII covenants where he appears to opine that a separate landscape value may arise from the (legal) covenant itself as opposed to the various attributes that justify and underpin the covenant. In my opinion the two are inextricably linked. The covenant is there because the various combined attributes of the land parcel meet the standard worthy of a QEII covenant. In addition, the area will subject to a level of ongoing monitoring and management that may not occur to the same level at adjacent areas.

If the landscape values of the QEII covenanted areas are disregarded, then my overall ranking of the DOC-Get sites is **‘Moderate’**.

I am encouraged by Mr Girvan’s response and recommendation to the Applicant regarding conditions and ongoing management, to be allied with the substantive future application, where he states: *“I support the intent of DOC’s proposed conditions. If Winstone is able to strengthen its pest and weed control commitments in response to those conditions, that would further reinforce the certainty of the anticipated landscape benefits.”* And: *“I would describe the applicant’s improvement package, and more particularly the DOC conditions if adopted or reflected in amended conditions, as strengthening the long-term landscape trajectory of the DOC-Get land.”* And: *“...I remain of the view that the DOC-Get land, considered as a package and alongside the proposed improvement measures and DOC’s recommended conditions, would make a stronger and more certain long-term landscape contribution to the Conservation Estate than the DOC-Give land.”*

3.4. Winstones Improvement Package A

3.5. Winstones Improvement Package B

No landscape-related comment – these documents largely concern legal and ecological aspects including additional activities proposed in the wider Belmont Regional Park. While Package B includes additional improvements, they are not great enough to alter my conclusions on the seven-point scale regarding the relative overall landscape values for the DOC-Get and DOC-Give blocks, noting that most improvements include land outside the various land parcels, and therefore also outside my scope. I note that there is no change in the Applicant’s landscape values for the DOC-Give and DOC-Get blocks between Package A and Package B.

4. Discussion

My opinion with regards to the current conservation values of the various land parcels included in my advice statement has not altered following the various comments received. I am supportive of the Applicant’s approach in principle to adopting the various DOC conditions of consent, should the land exchange be granted.

5. Recommendation

That any additional conditions proffered by the Applicant in ‘Appendix 7 – Package B Draft conditions proposed by Winstones’ AND the additional / amended conditions recommended by DOC in their Draft Report be adopted, should the land exchange be granted.