

By Fast-track Portal

27 August 2026

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Tēnā Koe

Consultation under section 46 of the Fast-track Approvals Act 2024: Belmont Quarry Development

Thank you for your letter dated 20 August 2026 requesting that Wellington Regional Council (Greater Wellington) provide feedback on the completeness of the substantive application for Belmont Quarry under section 46 of the Fast-track Approvals Act 2024 (FTAA).

In relation to the application for resource consents, Greater Wellington is providing comments on the completeness of the application as a consent authority under the Resource Management Act 1991 (RMA). In relation to the application for concessions, Greater Wellington is providing comments on the completeness of the application as the local authority that manages Belmont Regional Park (within which the concessions are sought) under the Reserves Act 1977.

Completeness – application for resource consents

Greater Wellington has considered whether the application includes the information required for resource consent applications under clauses 5, 6, and 7 of Schedule 5 to the FTAA

Greater Wellington considers that the information requirements described in **Attachment 1** to this letter have not been addressed or have not been provided in sufficient detail for decision-makers to assess the effects of the proposal.

Completeness – application for concessions

The substantive application includes an application for concessions to undertake a range of activities within Belmont Regional Park. Greater Wellington is the manager of Belmont Regional Park under the Reserves Act 1977.

Greater Wellington has considered whether the application includes the information required for concession applications under clause 3 of Schedule 6 to the FTAA. Greater Wellington considers that the information requirements described in **Attachment 2** to this letter have not been addressed or have not been provided in sufficient detail for decision-makers to assess the effects of the proposal.

In the case of the written agreements referred to in **Attachment 2**, Greater Wellington notes that under clause 7(3)(a) of Schedule 6 to the FTAA, the Expert Panel cannot grant concessions for activities on a reserve managed by a local authority if written agreement for those activities has not been provided by the local authority. Greater Wellington also notes the applicant's proposed management of effects as part of the resource consents that it has applied for relies on the approval of the concessions sought by the applicant, so the absence of written approvals may frustrate the ability for the resource consents sought by the applicant to be given effect to. Greater Wellington therefore considers that this is an issue that must be resolved before the application is accepted.

Existing resource consents

Greater Wellington confirms the written notice under section 30(3)(b)/30(5) of the FTAA, dated 8 July 2026 remains accurate and final at the time of receiving this letter.

Should you have any questions about our feedback on completeness and scope, please contact Jessica Glover at [REDACTED]

Ngā mihi



Richard Percy
Team Leader, Major Projects
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Attachment 1: Information not included in substantive application for resource consents

Relevant clause(s) in Schedule 5 of the FTAA	Assessment of Schedule 5 Matters	Information required
5(1)(h)	An assessment of the activity against relevant provisions – National Environmental Standards and the Regional Plan. Greater Wellington has identified the following rules and regulations that appear to apply to the proposal, but which have not been addressed in the application: - Regulation 45A of the National Environmental Standard for Freshwater (NES-F): The applicant has assessed proposed offsetting activities under Regulation 45A of the NES-F. Greater Wellington considers that the proposed offsetting activities are not for the purpose of quarrying activities (rather, they are a result of managing the effects of quarrying activities) and therefore regulation 38 and/or regulation 39 which relates to restoration, wetland maintenance and biosecurity of natural inland wetlands is the more applicable regulation. - Rule R151 of the Natural Resources Plan for the Wellington Region (NRP): Paragraph 125 of the substantive application documents state that redirection of tributaries will be required as part of works associated with the creation of new wetland habitat within the Belmont Regional Park. The Applicant has assessed Rule R151 in regard to the stream and wetland reclamations and associated damming and diversion but has not assessed this rule in regard to the wetland creation works. - Rule R93 of the NRP: Greater Wellington considers Rule R93 is applicable to the proposal to authorise the discharge of overburden material. The Applicant has not assessed or applied for a discharge permit under this rule. - Rule R117 of the NRP: Greater Wellington considers Rule R117 is applicable to the proposal to authorise the removal of indigenous plants in regard to the translocation of swamp maire and ramarama. The Applicant has not assessed or applied for resource consents under this rule.	An assessment of the activity against the listed regulation and rules.

Relevant clause(s) in Schedule 5 of the FTAA	Assessment of Schedule 5 Matters	Information required
5(5)(a)	Permitted activities The applicant has provided an assessment of the relevant permitted activities in Section 14.2 of the substantive application. In addition to those identified by the applicant, Greater Wellington considers the following permitted activity rules and regulations are relevant to the proposal but which have not been addressed in the application: • Rule R165 of the NRP and Regulation 40 of the 'NES-F, which relate to investigation and monitoring bores and scientific research, are applicable to the proposed installation of piezometers within wetlands for hydrological monitoring purposes. • The Erosion and Sediment Control Plan (ESCP) included in the application indicates dewatering may be required from the excavations. Accordingly, Rule R159 of the NRP is considered relevant, as it provides for dewatering activities as a permitted activity, subject to compliance with the relevant standards and conditions.	An assessment demonstrating compliance with Rule R165 and Rule R159 in the NRP and Regulation 40 in the NES-F.
6(1)(c)	Assessment of possible alternative methods of discharge While the application discusses alternatives in relation to the location of the Overburden Disposal Area (OBDA), the application does not address alternative discharge methods.	An assessment of the alternative discharge methods considered and discounted.
6(1)(d)	Assessment of Effects – Hydrology The proposed hydrological monitoring framework have not been provided in sufficient detail as there appears to be several inconsistencies between the recommendations set out in the Hydrological Report and the monitoring specified within the conditions and management plans. The Hydrological Report recommends hydrological monitoring, including the installation of shallow piezometers within the most upstream wetland in each of the drainage lines and water level monitoring in the pond at the Firth QE11 boundary. Additionally, the Landscape and Ecological Monitoring Plan (p19) requires “<i>installation of groundwater monitoring piezometers within selected drainage lines and a background reference location</i>” for the Eastern Catchment Wetland System and in Section 10.3 specifies that “<i>Vegetation condition and groundwater level trends shall be considered together to determine whether any observed changes are consistent with</i>	Details, including methodology of the proposed hydrological monitoring, including updates to the relevant management plans to which the hydrological monitoring will be implemented through.

Relevant clause(s) in Schedule 5 of the FTAA	Assessment of Schedule 5 Matters	Information required
	<i>natural seasonal variation or may be attributable to project-related activities”</i> The monitoring and assessment specified for the Central Western Catchment Swamp Maire Gully is more focussed on sedimentation, with no mention of hydrological monitoring. Additionally, Swamp maire are particularly sensitive to hydrological changes and therefore it would be expected that similar monitoring and assessment requirements for the Swamp Maire wetlands are incorporated into the management plans.	
6(1)(d)	Assessment of Effects – Long Term Rehabilitation of the OBDA The application proposes a Long-term Landscape Rehabilitation Plan, but a draft version of this plan has not been included with the application. Greater Wellington considers that insufficient detail has been provided regarding the proposed rehabilitation measures, and that a draft plan is necessary to assess whether the plan will adequately manage the effects of the proposal.	A Draft Long Term Landscape Rehabilitation Plan
6(1)(a) 6(1)(d)	Assessment of effects - Freshwater Ecology – Streams Greater Wellington has identified the following matters that it considers have not been provided in sufficient detail: - The application does not demonstrate what legal arrangements will be used to protect the proposed offset sites in perpetuity. - The application does not address ongoing access to the offset sites within the Belmont Regional Park. - The Ecological Assessment has provided information to assess the value and effects on the streams within the project site, recognising that avoidance and minimisation is not possible (i.e. the streams will be lost due to infilling). This assessment is, however, incomplete as it is not sufficient to ascertain the level of effects due to uncertainty in the end outcome and whether this consists of remedy (i.e. rebuilding the streams on top of the OBDA) or offsetting (i.e. enhancing a stream elsewhere). - The assessment notes that the consent holder will aim to rebuild streams on the completed OBDA (i.e. as a remedy); however, this would be some time later creating a significant time lag in effects being	Details on the legal arrangements intended to protect the proposed offset, including any updates to the conditions of consent to reflect this. Details on ongoing access to the Belmont Regional park to undertake monitoring and maintenance of the offset sites. Information that demonstrates that remediation within the OBDA is feasible, time lag effects are inconsequential, and offset is not required. Should remediation not be feasible, or the time-lag is

Relevant clause(s) in Schedule 5 of the FTAA	Assessment of Schedule 5 Matters	Information required
	remedied. While the application discusses the use of offsetting to address time-lag effects for terrestrial vegetation, it does not appear to assess whether a similar approach is required for streams. - The Heffernan Block is identified as having a suitable stream for an offset but only if unable to recreate suitable streams on the completed OBDA. Therefore, there would be a significant time lag before recreated streams are established (potentially 30+ years). There is also uncertainty as to whether the stream on the Heffernan Block will remain available in the future for the proposed offset and whether it will achieve the Ecological Compensation Ratio (ECR) outcomes identified, including the required Stream Ecological Valuation (SEV) values and extent.	consequential, information that demonstrates the offset stream will meet the criteria identified to sufficiently offset the partial or complete loss of the streams within the OBDA.
6(1)(a) 6(1)(d)	Assessment of effects - Freshwater Ecology – Wetlands Greater Wellington has identified the following matters that it considers have not been provided in sufficient detail to enable the effects of the proposal to be assessed: - The application documents state that there will be a diversion of a tributary for works associated with the creation of wetland habitat. No further details are provided regarding this diversion. - The Ecological Offset Management Plan (EOMP) notes that the re-purposing of the Sediment Retention Ponds (SRPs) may be considered as a remedy of effects, however no further details or methodologies for this is provided. - The application does not address ongoing access to the offset sites within the Belmont Regional Park. - The application does not demonstrate what legal arrangements are in place to protect the proposed offset sites in perpetuity. - Without a Biodiversity Offset Accounting Model (BOAM), ecological equivalency and no net loss cannot be demonstrated. Offsetting is covered in the Ecological Assessment at pages 68-70. What has been provided gives the appearance of a like-for-like quantitative loss/gain calculation offset calculation following the BOAM model (Maseyk et al, 2016) but the	Details of the proposed diversion, including: - Details of the extent of the diversion, including the length of affected channel and area of disturbance. - An assessment of the adverse effects from the diversion. - An assessment against relevant statutory documents (i.e. applicable rules, regulations, objectives and policies). - Proposed conditions to manage the diversion. Details of the re-purposing of the SRPs, including any updates to the relevant management plans.

Relevant clause(s) in Schedule 5 of the FTAA	Assessment of Schedule 5 Matters	Information required
	inputs into the excel calculator are arbitrary and have not been justified. Given the applicant has undertaken 20 x 20 recce plots they do have the quantitative data available to use the BOAM model as intended.	Details of ongoing access to the Belmont Regional Park to undertake monitoring and maintenance of the offset sites. Details of the legal arrangements intended to protect the proposed offset, including any updates to the conditions of consent to reflect this. A revised BOAM assessment using the available quantitative data, demonstrating ecological equivalency and no net loss.
6(1)(a) 6(1)(d)	Assessment of effects – Terrestrial Ecology Greater Wellington has identified the following matters that it considers have not been provided in sufficient detail to enable the effects of the proposal to be assessed: - Without a BOAM, ecological equivalency and no net loss cannot be demonstrated. Offsetting is covered in the Ecological Assessment at pages 68-70. What has been provided gives the appearance of a like-for-like quantitative loss/gain calculation offset calculation following the BOAM model (Maseyk et al, 2016) but the inputs into the excel calculator are arbitrary and have not been justified. Given the applicant has undertaken 20 x 20 recce plots they do have the quantitative data available to use the BOAM model as intended.	A revised BOAM assessment using the available quantitative data, demonstrating ecological equivalency and no net loss.

Attachment 2: Information not included in substantive application for concessions

Relevant clause in Schedule 6 of the FTAA	Information not included in substantive application	Information required
(3)(1)(g)	Species Translocation Plan The application does not provide sufficient detail about how the translocation of trees from the Overburden Disposal Area (OBDA) to locations within Belmont Regional Park will be carried out. This is an important omission, as the translocation process itself could result in greater adverse effects on the receiving environment than the ecological benefits ultimately gained. This concern is particularly relevant for swamp maire, where mature trees are proposed to be uplifted from the OBDA and transplanted into wetland areas in the Park, likely requiring the use of heavy machinery in sensitive wetlands. The Landscape and Ecological Management Plan (included as part of the resource consent applications) notes that a Species Translocation Plan will be prepared prior to the translocation of trees. Greater Wellington considers this document should be provided as part of the concession application, as the proposed methodology should be considered during the assessment of the application rather than after approval.	A Species Translocation Plan setting out the method for undertaking translocation and how the effects of translocation and associated activities within the park will be managed.
(3)(1)(m)	Written agreement of the local authority as reserve manager (under Schedule 6 Clause 7(3)(a) of the FTAA) The application seeks concessions to undertake the following activities within the Belmont Regional Park (as described in Section 2 of the Concession Application, at pages 3 and 4): a) creation and planting of two new wetlands totalling 2,000m², restoration of existing wetlands, riparian planting of the headwaters of Speedy's Stream and staged indigenous offset planting within the Heffernan Block, including site preparation, earthworks associated with wetland creation, planting, establishment, maintenance, monitoring, weed and pest control, adaptive management and associated access; b) transport, release and monitoring of protected indigenous lizards at the approved receptor sites, including associated habitat preparation, predator control, monitoring, adaptive management and access; and c) relocation of swamp maire, ramarama and coprosma rubra from within the OBDA to the approved receptor areas within Belmont Regional Park, including tree	Written agreement under Schedule 6 Clause 7(3)(a) of the FTAA from Greater Wellington as the manager of Belmont Regional Park to undertake the activities described in (a), (c), and (d). Greater Wellington notes that providing written agreement to these activities would require, firstly, a request by the applicant to undertake these activities, and secondly, a decision by Greater

Relevant clause in Schedule 6 of the FTAA	Information not included in substantive application	Information required
	preparation, transport, replanting, establishment, maintenance, monitoring and adaptive management. d) seed collection, cuttings or propagation of swamp maire within the Belmont Regional Park. The application includes a written agreement from Greater Wellington as the manager of the reserve (dated 18 August 2026, at page 64 of the concession application) however this agreement applies only to activity (b). The application does not include written agreement from Greater Wellington as the manager of the reserve for any of the other activities for which a concession is sought under (a), (c), or (d). For the avoidance of doubt, the letter provided by Greater Wellington dated 15 June 2026 (at page 59 of the concession application) is not a written agreement under Schedule 6 Clause 7(3)(a) of the FTAA.	Wellington to provide written agreement.