

Memo

TO Amy Robinson, Department of Conservation

CC [name]

FROM Jade Wikaia, Wikaia Consulting
Charlie Hopkins, Wikaia Consulting (Contractor)

CC Shalini Sanjeshni, Winstone Aggregates; Phernne Tancock

DATE 5 March 2026

TOPIC Belmont Land Exchange Application – Response to Comments

1 Introduction

1.1 This report was prepared by Wikaia Consulting, with input from Derive Consulting.

Jade Wikaia

1.2 My name is Jade Te Awhina Wikaia. I am the Managing Director at Wikaia Consulting Limited.

1.3 I prepared the Land Exchange Report (Report) on behalf of Winstone Aggregates (Winstone) for the Belmont Quarry Development project that was lodged with the Department of Conservation on 8 December 2025. My role was also to provide planning and iwi engagement expertise in relation to the land exchange application.

1.4 I have the following qualifications:

- a) I hold a Bachelor of Planning from the University of Auckland and a Master of Business Administration from the University of Wellington.
- b) I am an accredited hearings commissioner.

1.5 I have 20 years of policy and planning experience working in local and central government and consultancies.

1.6 This memorandum responds to comments received from invited persons and groups in relation to the Belmont land exchange application lodged under Fast-track Approvals Act 2024. This response is confined to the land exchange application only.

Charlie Hopkins

1.7 My name is Charlie Hopkins. I am the Managing Director at Derive Consulting Group Limited.

1.8 I prepared parts of the Land Exchange Report (Report) in collaboration with Wikaia Consulting, which was subsequently used by Winstone Aggregates (Winstone) and filed with the Department of Conservation. My role was also to provide strategy, drafting, peer review, and proof reading in relation to the land exchange application.

- 1.9 I have the following qualifications:
- I hold a Bachelor of Science from the Victoria University of Wellington and a Master of Resource Management from Massey University.
 - I am an active member of RMLA.
- 1.10 I have 12+ years of consenting and environmental experience working in local government and consultancies.
- 1.11 This memorandum responds to comments received from invited persons and groups in relation to the Belmont land exchange application lodged under Fast-track Approvals Act 2024. This response is confined to the land exchange application only.
- 1.12 This memorandum has been prepared in accordance with the Environment Court Practice Note 2023 (Code of Conduct for Expert Witnesses). The authors confirm they agree to comply with that Code.

2 Comments

- 2.1 Comments were received from the following persons and groups:

Referred to in s53(2) of the FTAA 2024	Comments received
53(2)(a)	Greater Wellington Regional Council (GWRC), Hutt City Council
53(2)(b)	Taranaki Whānui ki te Upoko o Te Ika, Ngāti Toa Rangatira
53(2)(h)	[REDACTED]
53(2)(i)	Queen Elizabeth the Second National Trust (QEII)
53(2)(j)	Minister for Infrastructure
53(2)(k)	Heritage New Zealand – Pouhere Taonga
53(2)(l)	GWRC, New Zealand Transport Agency
Listed in clause 25 of schedule 6	New Zealand Conservation Authority (NZCA), Wellington Conservation Board
	Friends of Belmont Regional Park, QEII, Transpower New Zealand Limited, Firth Masonry, Fulton Hogan.
Section 53(3)	Wellington Botanical Society

3 Response to comments

GWRC

- 3.1 The GWRC provided correspondence with five attachments:

Attachment	Summary
Email from David Boone – 17 October 2025	Email to FastTrackApplicationEnquiries providing attached information relevant to the upcoming Fast Track application from Winstone Aggregates to expand the Belmont Quarry.
Advice to Delivery on Winstone's Belmont Quarry Land swap proposal October 2025	Memo to David Boone 7 October 2025: Information pack to support decision making with a summary of terrestrial and freshwater information held by GWRC in relation to the land exchange areas: Attachment 1 – information provided to GWRC from FoBRP (Friends of Belmont Regional Park).

	Attachment 2 – Land exchange information summary table.
Attachment 1A	18 September 2025 email to Jack Mace from Friends of Belmont Regional Park.
Attachment 1B	18 September 2025 correspondence to Rachael Mora, Department of Conservation from the Wellington Botanical Society.
Attachment 1C	2 October 2025 correspondence from Dr Colan Balkwill.

- 3.2 This correspondence was received by Winstone from GWRC in October 2025. The matters raised were discussed through pre-lodgement consultation meetings with GWRC and informed the development of the land exchange application. These matters have already been addressed in the technical assessments filed in support of the application.

Hutt City Council

- 3.3 Hutt City Council note a neutral position on the proposed land exchange proposal.
- 3.4 No further response is required beyond what is already stated in the Land Exchange Application (Wikaira, 2025).

Taranaki Whānui ki Te Upoko o Te Ika

- 3.5 Taranaki Whānui noted *comprehensive* engagement on the proposed land exchange. The issues raised by Taranaki Whānui are captured in the Cultural Values Assessment (Appendix B7) and the associated improvements package (section 10 of the Report) prepared for the application.
- 3.6 No further response is required beyond what is already stated in the Land Exchange Application (Wikaira, 2025).

Ngāti Toa Rangatira

- 3.7 Ngāti Toa Rangatira maintain a neutral position on the proposed land exchange. The matters raised included overall conservation benefit, independent ecological assurance, loss and vulnerability of swamp forest and protection of water bodies and associated species.
- 3.8 The regional scarcity and vulnerability of swamp forest, including swamp maire, were discussed during the site visit and consultation with Ngāti Toa, noted in Appendix C of the application. Matters relating to the protection of water bodies and associated species including sediment control, water flow management, and monitoring frameworks will be addressed as part of the substantive application for RMA and wildlife approvals. Similar feedback had been provided to Winstone as part of pre-lodgement consultation.

- 3.9 An email was received from L [REDACTED] W [REDACTED] of [REDACTED]. Comments were directed to the Department of Conservation as future owner about future land use of the Southern Gully. There were no issues raised in relation to the land exchange application. No further response is required.

QEII National Trust

- 3.10 QEII maintains a neutral position regarding the Belmont Quarry Development and repeats its position given in consultation i.e. that land use cannot be inconsistent with the open space covenant. These matters have been adequately canvassed with QEII National Trust in pre-lodgement consultation. The application contains confirmation from DOC that it is accepting of the QEII Covenant without changes (See Wikaira (2025) at [12.7]).

Transpower

- 3.11 I have no additional comments in response to the Transpower letter (24/02/2026) beyond what is already stated in the Land Exchange Application (Wikaira, 2025:C1 at [5.14]), that letter reflects the pre-lodgement engagement undertaken between the parties.

Minister for Infrastructure

- 3.12 Letter received from Hon Bishop noting projects like Belmont Quarry Development are critical for economic growth of New Zealand, this is consistent with Winstone's assessment of the significance of the exchange, set out in the economic assessment. There were no issues raised in relation to the land exchange application. No further response is required.

Heritage New Zealand – Pouhere Taonga (HNZPT)

- 3.13 HNZPT noted the land exchange proposal does not intend to modify or destroy any archaeological sites and therefore the Heritage New Zealand Pouhere Taonga Act 2014 is not triggered by the exchange proposal.
- 3.14 HNZPT noted the land exchange will enable the next stage of the Belmont Quarry Development Project that will involve earthworks that may modify or destroy an archaeological site(s) and anticipate an archaeological authority application will be required in the next stage. These issues relate to the substantive application and will be progressed at that stage.
- 3.15 No further response is required beyond what is already stated in the Land Exchange Application (Wikaira, 2025).

New Zealand Transport Agency (NZTA)

- 3.16 The New Zealand Transport Agency Waka Kotahi provided comment on the proposed land exchange. NZTA's comments repeat its pre-lodgement consultation with Winstone (which is addressed at [6.15] in Wikaira (2025:C1) as well as Appendix D18 of the Application Package.
- 3.17 NZTA is currently investigating alternatives to relocate the offset planting within other areas of the Belmont Regional Park and has been in discussions with the GWRC, HCC and UHCC to do so. GWRC has proposed a new site outside of the land exchange area which has been agreed to in principle by NZTA. NZTA is now seeking internal sign off, and approval from HCC and UHCC, that this alternative location complies with offset planting requirements.
- 3.18 NZTA has confirmed that NZTA's only interest in the land exchange is the proposed offset area, and as described above, and its intention is to actively work to secure a new location

outside of the land subject to the land exchange, to fulfil our obligation for completing the offset planting. When NZTA obtains the relevant approvals, it will have no further interest in the land exchange.

- 3.19 Winstone has engaged with UHCC, LHCC, GWRC, and NZTA to find a satisfactory outcome for all parties.
- 3.20 The comment from NZTA (copied above), is consistent with the consultation summary in Wikaia (2025: C1, C2). Ongoing consultation with NZTA has confirmed that Agency staff have prepared an alternative management plan and are working through the approvals process of that plan becoming operative. At the time of writing this memo, an Outline Plan of Works has not been filed at Hutt City, but we understand the Agency intends to do so

New Zealand Conservation Authority (NZCA)

- 3.21 The NZ Conservation Authority provided comment on the proposal, which is undated but was received in February 2026.
- 3.22 The NZCA considers that the proposal will not result in a net benefit for conservation as required by the Act.

Paragraph 13: “With respect to Section 4 of the Conservation Act 1987, and giving effect to the Principles of the Treaty of Waitangi, the documentation provided by the applicant refers to consultation that has been undertaken with Taranaki Whānui ki te Upoko o Te Ika, Ngāti Toa Rangitira, Te Āti Awa Nui Tonu, Rangitāne Tū Mai Ra, and Muaūpoko on cultural acceptability and tangata whenua-specific conditions, but as the material reporting on this has been almost completely redacted it is not possible for us to understand the nature and outcomes of that consultation.”

Response

- 3.23 Winstone has undertaken comprehensive engagement and consultation with Taranaki Whānui ki te Upoko o Te Ika, Ngāti Toa Rangitira, Te Āti Awa Nui Tonu, Rangitāne Tū Mai Ra, and Muaūpoko in relation to the proposed land exchange.
- 3.24 The outcomes of that engagement are reflected in the Cultural Values Assessment at Appendix B7 and summarised in the Consultation Record and Consultation Summary at Appendix C. Assurance can be provided to NZCA that Winstone did consult closely with those parties pre-lodgement and continues to engage with them. These documents set out the matters raised by mana whenua and how they have been addressed in the application, including through proposed conditions and the improvements package.
- 3.25 At the request of mana whenua certain material has been redacted where it contains culturally sensitive information. While Winstone’s views were sought regarding proposed redactions, ultimately that decision was for DOC and the Environmental Protection Authority to determine whether material should be withheld.

Section 4 Paragraphs 14-21, 23: NZCA provides comments regarding *net conservation benefit*, biodiversity and habitat, boundary effects and edge effects, restoration efforts, species identification and spatial distribution.

Response

- 3.26 Restoration efforts, including but not limited to pest plant and animal control, are proposed in Section 10 of Wikaira (2025) at pages 77-81. This will address edge effects from neighbouring rural lifestyle properties as part of the proposed management plan.
- 3.27 In preparing this answer, we have relied on the methods and results of Blue Green Ecology (2025:B1). Post-exchange, the increased perimeter length is an administrative matter and ecologically is connected into a contiguous habitat to the north and east. The boundary relates to land tenure, but the property boundaries are not the edge of ecological habitats. The “size, shape and buffering” of each block contributes to its ecological context score (Blue-Green Ecology (2025:B1) Table 5, page 28).
- 3.28 Per the supplementary material prepared by Boffa Miskell (03 March 2026) which shows that the length of the property boundary increases as a result of the proposal. The existing property boundary has a length of 16.31 km. The proposed property boundary is 19.88 km. This is approximately a 22% increase.
- 3.29 However, it is important to note that this measurement is of the property boundary, which is not necessarily the edge of ecological habitat.

Section 4 Paragraph 22: “The fragmentation also will affect the recreational values of the area. The proposed OBDA comes right up to Buchanan’s Walking Track and changes to the land in the OBDA will be visible from just under half of the Buchanan Track, and from sections of the Dry Creek Loop Track. There are issues about public access to the Dry Creek area with the proposed OBDA abutting the main track. The DOC-Get land consists of areas where there is no (or very little) public access and enabling public access with be very challenging based on the terrain. Given the land being transferred is currently a Recreation Reserve it is not clear how the exchange will result in a net benefit for conservation and, in particular, for the purposes this land is held. Given the terrain and access issues, NZCA questions the opportunities and costs for enabling recreation on the DOC-Get parcels.”

Response

- 3.30 The net-gain in recreation value is demonstrated in Wikaira (2025) at [9.62]. This assessment is predicated on the position held by GWRC during consultation that it had no desire for new tracks to be constructed on land it managed to allow for connectivity, despite Winstone proposing several options that were canvassed with the GWRC Parks team.
- 3.31 In preparing this answer, We have relied on the methods and results of Rob Greenaway & Associates (2025:B4). The methods and results of Rob Greenaway & Associates (2025:B4, Page 8 Section 2.1; Page 13, Section 4) are replicated here, namely that the DOC-Give land has ‘low’ recreational value, and that the proposed exchange results in no-net-loss of recreational value.
- 3.32 Feedback has informed the design of the shape and layout of the DOC-Give land (and OBDA within) including but not limited to avoiding effects on Buchanan's Road Tramping Track (Rob Greenaway & Associates (2025:B4, Page 13, Section 4). Mr Greenaway concludes that the loss of the utility track section of the Buchanan Road Tramping Track is immaterial. Further to this point, it is worth noting that much of the Belmont Regional Park is found to be located on steep terrain and is unsuitable for track building, and therefore it

would not be prudent to use 'tracks' as a sole criterion for acceptability of the proposed exchange.

Wellington Conservation Board

3.33 The Wellington Conservation Board (WCB) provided comment on the proposal.

Paragraphs 2, 5-7: Research and use of volunteers

Response

3.34 The WCB states the proposed land exchange presents opportunities for longitudinal ecological research and highlights the significant contribution that volunteer groups have made to ecological restoration and community engagement within Belmont Regional Park.

3.35 In Wikaira (2025) at [10.13] is a description of an ecological restoration plan for the proposed improvement package for DOC, which has not been commented on in detail by those invited to comment. The Ecological Restoration Plan responds to mana whenua direction to strengthen their relationship and whakapapa to the area. In the preparation of this final draft, allowance could be made for the integration and involvement of the community into the development of this plan and restoration planting. Given the interest of Friends and Botanical Society in swamp maire, provision could be made for their involvement in the development of this plan.

This restoration plan includes (as a summary):

- a) Goat and possum control in the Northern Gully.
- b) Pest plant control in Cottle Block.
- c) Pest plant control in Southern Gully.
- d) Commitment to establish 200 swamp maire in suitable wetland habitat in Southern Gully.
- e) Pest plant control and replacement planting at Dry Creek, this includes but is not limited to ~7000 native plants or 8,000 sqm.
- f) Pest plant control and replacement planting at Firth QEII, this includes but is not limited to ~1000 Kamahi and ~1000 Olearia-Kanuka mix.
- g) Pest animal (rat) control at Firth QEII.

3.36 No person appears to have raised issue with the draft ecological restoration plan during the post-application, DOC-initiated consultation.

Paragraphs 3-4: Effects on ecological values including but not limited to scale and scope, and Swamp Maire.

Response

3.37 These matters are addressed in the reporting package filed by the Applicant, specifically Blue Green Ecology (2025:B1) at Section 9.3 (but also see s 4.2.4, 6.1.6, 6.2.5, 6.5.4), while being read in the context of Blueprint Ecology (2025:B2), and Boffa Miskell (2025:B3).

3.38 The methods and results of those reports was relied upon in preparing the Comparative Assessment of Conservation Values in Wikaira (2025) at [105]. That Assessment concludes that the project will '*provide a net conservation benefit*', while acknowledging that for some values (i.e. bats, archaeology) there is no change.

- 3.39 The Applicant has also proffered an improvements package (see Wikaira, 2025, at Section 10) which includes the replanting of Maire, Kamahi, Olearia, and Kanuka, along with pest plant and pest animal control. Those commenting on the proposal appear to have overlooked the conservation benefits offered by the improvement package.

Paragraphs 1, 9: “The Department’s 5 Year Regional Strategy (updated 8 January 2026) states that DOC will take an integrated landscape approach to conservation aligned to nature, rather than administrative boundaries. The intent is to ensure all factors and perspectives are weighed and prioritised. Supporting iwi and like-minded partners is critical to success in this context, adopting a strong partnership-based approach to mitigation efforts is vital.”

Response

- 3.40 The proposed land exchange does not preclude DOC from undertaking its work with an integrated landscape approach, in partnership with community and Te Tiriti partners. As indicated in the land exchange report Winstone has undertaken significant consultation with mana whenua, community, local, regional, and central government, infrastructure providers, neighbours, and other stakeholders and their views have shaped the exchange proposal. This feedback has informed the design of the shape and layout of the DOC-Give land (and OBDA within) to avoid features where possible.

Friends of Belmont Regional Park ('Friends')

- 3.41 Friends of Belmont Regional Park provided comments on the land exchange application. The following sections respond to the specific planning matters raised throughout the comments.
- 3.42 Since receiving written comment from Friends, Winstone has communicated (email 03/03/26) with Friends requesting a site walkover together to share information.

Paragraph 7: *"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."*

Response

- 3.43 At paragraph 7, Friends comment on the fast-track application process and make reference to the Toitū Te Whenua Parks Network Plan 2020-2030 in relation to public submissions.
- 3.44 Section 15 of the Application (Wikaira, 2025) assesses the matters that DOC and the panel take into account in preparing their respective report and decisions under Schedule 6, clauses 26 and 29 of the Act. Sections 15.26 - 15.32 provide an assessment of the Toitū Te Whenua Parks Network Plan 2020-2030 including an overview of the Plan and its statutory context, management outcomes sought for Belmont Regional Park, relevance to the exchange area and proposal, alignment of the exchange with park management objectives and land disposal under Toitū Te Whenua.
- 3.45 The written comment from Friends does not raise any new information that changes our methods and results in Wikaira (2025) at Section 15 (matters for the Director General to consider) with particular regard to Toitū Te Whenua at 15.26 of that report. The Fast Track Approval Act 2024 creates a new legal process for exchange applications to be considered. Winstone is entitled to rely upon that process.
- 3.46 Paragraph 8: *"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 recognize this deficit."*

Response

- 3.47 Consideration of RMA planning provisions does not arise in the assessment of the land exchange. RMA plans only relevant to resource consent application, which has not been made yet and will form part of the substantive Fast Track application.
- 3.48 There is no requirement to undertake a plan change under the RMA in advance of lodging a substantive application for RMA approvals under the FTAA 2024. The RMA consent

application will be assessed by reference to the operative and proposed plan provisions, insofar as is required by the Fast-track Approvals Act.

- 3.49 The Applicant has consulted widely, including with GWRC, HCC, and other stakeholder groups such as the Friends, NZCA, WCB, QEII, and Game Animal Council and Fish and Game Council. A range of perspectives is evident in the comments received in Wikaira (2025:C1, C2). The majority of parties hold a neutral or support position, acknowledging that there are parties who hold an opposing position. Those views were carefully considered in the development of the proposal.
- 3.50 The suggestions in the Friends' comments that the OBDA development proposal "could not get consent under current plan rules" is not correct. The City of Lower Hutt Operative District Plan (PC56 version) zones the DOC-Give land as General Recreation Activity Area. The relevant Chapter (7A) does not contain any prohibited activity rules. In the absence of prohibited activity rules, the activity is able to be considered through the resource consent process.

Paragraph 13: *"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."*

Response

- 3.51 This is the first time Winstone has made a formal application for a land exchange.
- 3.52 Section 14.3 notes previous decisions and discussions with the Department of Conservation in 2018 and 2022 were informal in nature. No application was lodged and no statutory decision was made under any legislative framework. As noted in the application, these details were provided for completeness. These discussions do not amount to a formal discussion or a decision to decline by DOC or GWRC.

Paragraph 14: *"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."*

Response

- 3.53 No ecological features, *healthy populations of swamp maire, ramarama and other endangered species*, would be removed or destroyed as a result of the land exchange itself. This is an exchange of ownership of land; the only consequences of the exchange are changes in the ownership and status of land parcels. Any proposal to undertake physical works within the area would require approval through the substantive application process under section 42 of the Fast-track Approvals Act 2024 as part of RMA approvals.
- 3.54 This distinction has been confirmed through pre-application engagement with DOC and the completeness process undertaken by the Department of Conservation (section 34) in its letter dated 21 January 2026 '*Department of Conservation FTAA section 34 (completeness) check for a land exchange application (listed project)*'.

Paragraph 23: “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)”

Response

- 3.55 We agree that the stream length values in the last row are transposed. See Page 25 of Landscape Dynamics. Below is a corrected version of the same table (Wikaira, 2025, Page 76, Table 28.): This confirms that there is an increase in stream length values on DOC-managed land as a consequence of the proposed exchange.

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	1,855 m of stream length	3,029 m of stream length	Yes

- 3.56
- 3.57 In preparing this advice we have relied on Landscape Dynamics (2025: B9) as well as the supplementary memo of Mr McConchie, particularly the methods and results set out at pages 2-3. DOC will receive a net-gain in stream length as part of the promised exchange.

Paragraph 24: “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 QEII 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 (e.g. pest control and boundary maintenance) from the applicant to DoC.”

Response

- 3.58 Section 9 of the Land Exchange Application Report (Wikaira, 2025, section 9) provides a Comparative Assessment of Conservation Values and provides a framework and method for the assessment.
- 3.59 The DOC-Get land (being private property subject to an Open Space Covenant) is not a conservation area or Crown-owned reserve as it is defined in Schedule 6 Clause 22, insofar as it is not subject to the Conservation Act. Therefore, the conservation values of DOC-Get land currently sit outside of the ‘conservation areas’. The Comparative

Assessment of Conservation Values (Wikaira (2025) Section 9) sets out an objective methodical assessment of the conservation values of both pieces of land, identified in that report as DOC-Give and DOC-Get. That Assessment demonstrates that the conservation values of the DOC-Get land is greater than that of the DOC-Give land. Such that, when an exchange does occur then the exchange '*will enhance the conservation values of land managed by the Department of Conservation*', i.e. the value of conservation areas will be enhanced by the inherent values of the DOC-Get land irrespective of its ownership, or existing protection.

- 3.60 The inherent ecological value of the QEII-covenanted areas within DOC-Get is real and not diminished by their current tenure or covenant status. That those areas carry existing protection does not reduce the significance of their contribution to the DOC estate upon exchange. Rather, transferring the land into Crown ownership adds meaningful protection over and above what the Open Space Covenant alone provides. DOC ownership brings with it active and funded pest management obligations, statutory duties under the Conservation Act 1987, and the practical benefit of physical and ecological integration with adjoining conservation areas. The Open Space Covenant protects the conservation values of the land in their current form, but those values are not presently realised as part of land managed by DOC. The proposed exchange changes that. Upon completion, the ecological values of the covenanted areas will be transferred into, and accounted for as part of, land managed by DOC, thereby satisfying the enhancement test under Schedule 6 Clause 29(2) in a direct and substantive way.
- 3.61 QEII National Trust (QEII) provided comment on the land exchange application on 25 February 2026 and confirmed that it maintains a neutral position regarding the Belmont Quarry Development. QEII's primary interest is that the purpose and objectives of open space covenant 5-07-755 are upheld and that the open space values protected by that covenant are not compromised. QEII has further confirmed that, regardless of ownership status, it will continue to monitor the covenant and ensure its purpose and objectives are maintained. Notably, QEII have not raised an issue in their comments or consultation with the covenanted land being included as part of the land exchange. Further, DOC has confirmed through consultation that it is accepting that the exchange land is subject to the existing Open Space Covenant.

Paragraph 31: *"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 valued"; 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."*

Response

- 3.62 The previous position taken by DOC on a land exchange proposal is not relevant to the current application. Previous indications by DOC staff were on the basis of informal comments, made under different statutory regimes, with different legal tests, and for which no formal application was made. They were akin to initial pre-application inquiries about the

possibility of availability of exchange that were never progressed. Winstone provided these details to be fully transparent and to ensure that DOC staff had a thorough understanding of historic albeit informal discussions that had occurred between Winstone, DOC, and GWRC.

- 3.63 Furthermore, the 2018 and 2022 concept was materially different from the 2025 land exchange package, now before the Director-General. The earlier iteration did not include several ecological area or improvement commitments that form part of the current application. The 2025 proposal has been substantially redesigned, informed by extensive consultation with mana whenua, DOC, GWRC, the community and technical experts. DOC's informal views from 2018 and 2022 were based on a different proposal, a different evidence base, and outside the Fast-track approvals framework. Those preliminary views therefore do not have relevance to the statutory assessment required under Schedule 6 of the FTAA 2024.

Paragraph 36: *"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."*

Response

- 3.64 This application to the Director-General was lodged before commencement of the Fast-Track Approvals Amendment Act 2025, therefore the Act as it stood pre-amendment is relevant to the consideration of the exchange.
- 3.65 These matters are addressed in Reports: B1 Blue Green Ecology, B3 Blue Print Ecology, B3 Boffa Miskell, B4 Greenaway and Associates. The methods and results of those reports was relied upon in preparing the Comparative Assessment in Wikaira (2025), that concludes that the project will 'provide a net conservation benefit'¹, while acknowledging that for some values (i.e. bats, archaeology) there is no change. We also note our earlier comments, above in paragraphs 3.57-3.58, about the basis on which the conservation values of the QEII covenanted areas were accounted for in the proposed exchange.

Paragraph 45: *"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."*

- 3.66 The presence of swamp maire is well documented with a specific section in BlueGreen Ecology (2025:B1, Section 9.4, pg. 84). We consider that this section thoroughly and transparently documents the presence and distribution of that population.
- 3.67 The economic effects of the proposal are assessed in Market Economics (2025:B8). It appears as though that no commentator has opposed the methods or results of that report.

¹ FTAA 2024, Schedule 6, Clause 24, particularly subclauses 24(a) and 24(b).

- 3.68 Friends have not made any comment on that assessment or the benefits of the proposal, and their written comment does not identify any omission or deficiency in the economic assessment relied upon for the application.
- 3.69 As already noted, the land exchange will not result in the destruction of plants or ecological features.
- 3.70 We consider that the use of economic arguments to justify the destruction of plants and their habitats would constitute a trade-off, and that is not proposed in the design and documentation of the proposal. The application bundle methodically documents a comparative assessment, and assessment of effects on, conservation values across the exchange. At no point in Wikaira (2025) Sections 9, 10, and 11 is a trade-off relied upon to justify the exchange.

Paragraph 56: “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 a 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.

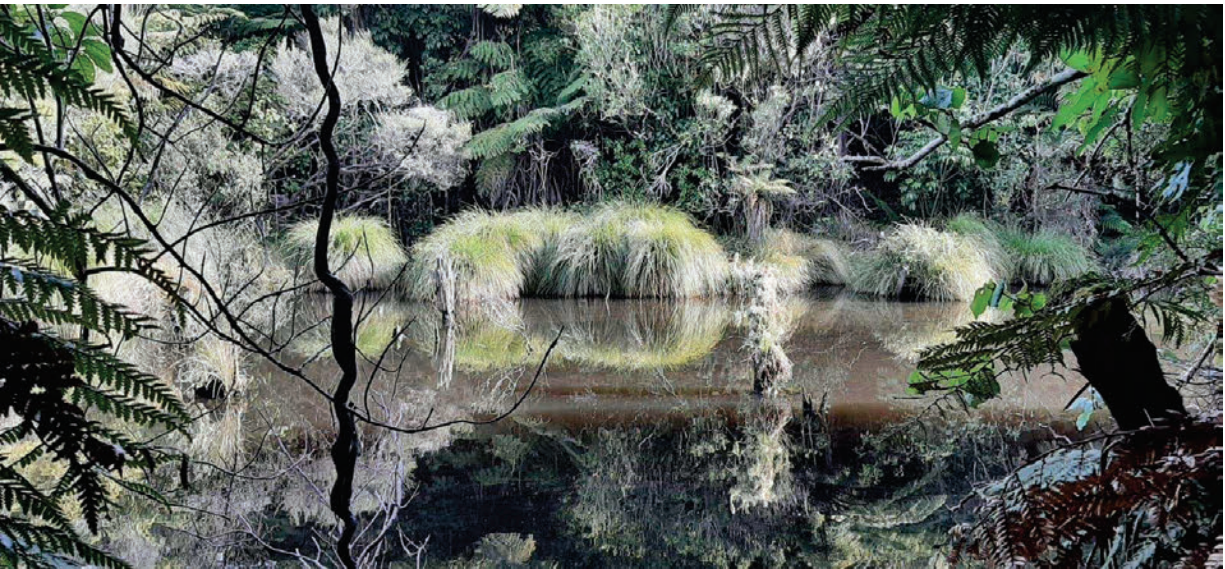


Fig 4: Pond at southern boundary of the POBDA, arguably one of the most beautiful features of Belmont Reginal Park”

Response

- 3.71 During consultation, staff from GWRC presented a view that there was no appetite for the creation of new tracks. Such a position is consistent with the absence of funding in Toitu Te Whenua and the LTP for the creation of a new loop track within the vicinity of the waterbody shown above (photo supplied by Friends).
- 3.72 The assessment by Rob Greenaway & Associates is that there is no net loss in recreation values as a consequence of the exchange.
- 3.73 Winstone remain open to further discussions regarding support of restoration or recreational facilities on Belmont Regional Park/ DOC owned land.

Paragraph 57: *"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).*

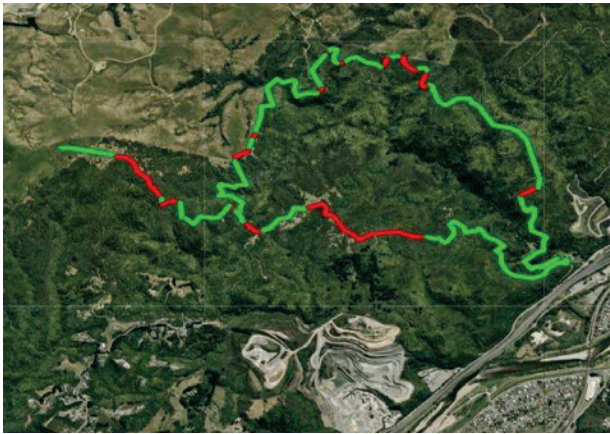


Fig 5: 40% of the main recreation resource in the park would have spoiled views."

Response

- 3.74 The creation of 'significant noise, visual pollution and dust' is not proposed as part of Land Exchange application to the Director-General. This application is made as a preliminary step for resource consent, to allow for the Director-General to prepare a report. Consideration of effects on the environment is a matter that will be addressed when Winstone Aggregates lodges its substantive application for resource consents and other approval types.

Paragraph 58: *"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."*

Response

- 3.75 The Wellington Conservation Management Strategy (CMS) 2019 does not apply to the DOC-Give and DOC-Get land currently, at the time of making this application. While the

CMS is expected to apply to the DOC-Get land if it becomes part of the conservation estate following the exchange, Policy 3.3.2.5 of the CMS is not applicable to the land exchange proposal.

- 3.76 The reasons given in Wikaira (2025) at [15.21] to [15.25] are adopted here.

Paragraph 59: *“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.”*

Response

- 3.77 During consultation, staff from GWRC presented a view that there was no appetite for the creation of new tracks. Such a position is consistent with the absence of funding in Toitu Te Whenua and the LTP for the creation of a new track.
- 3.78 The assessment by Rob Greenaway & Associates is that there is no net loss in recreation values as a consequence of the exchange.
- 3.69 Winstone remain open to further discussions regarding support of restoration or recreational facilities on Belmont Regional Park/ DOC owned land.

Paragraph 62: *“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.”*

and

Paragraph 64: *“A longer perimeter would also provide more workload for the new land-owner, which could be at odds with section 1B 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”.*

Response

- 3.79 Post-exchange, the increased perimeter length is an administrative matter, and ecologically is equally connected into a contiguous habitat. The boundary relates to land tenure, but the property boundaries are not the edge of ecological habitats.
- 3.80 BlueGreen Ecology (2025, pg. 90) identifies weed control and pest management, in accordance with an ecological restoration plan, following the exchange as part of its proposed conditions. Any concern about edge effects can be addressed as part of that plan. This matter could be added to the list of items to go into the plan included in the proffered conditions.

Paragraph 65: *“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.”*

Response

- 3.81 Post-exchange, the land will be no more ‘*physically remote and stretched away from the existing conservation lands*’ than it is currently. From an ecological perspective, the land is still equally connected as it is today, in relation to the highly mobile species such as birds which will regularly cross property boundaries. The boundary relates to land tenure, but the property boundaries are not the edge of ecological habitats.
- 3.82 In preparing this answer, we have relied on the methods and results of Blue Green Ecology (2025:B1, p. 67).

Paragraph 69: *“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.”*

Response

- 3.83 Post-closure remediation of previous works (successful or otherwise) is not the subject of this application.
- 3.84 Proposed conditions requiring weed control, pest management and restoration planting across the DOC-Get land and the preparation of an Ecological Restoration Plan are provided in Wikaira (2025, p.91–94).
- 3.85

Paragraph 73: *“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.”*

Response

- 3.86 The ‘*Burial of this stream, and consequent addition of fines and soil particulates into it*’ is not proposed as part of Land Exchange application to the Director-General. This application is made as a preliminary step for resource consent, to allow for the Director-General to prepare a report. Consideration of adverse effects on the environment will be addressed as part of the resource consent approvals that will be sought under the substantive application.

Paragraph 74: *“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”.*

Response

- 3.87 The Regulations of the NES-F are not a relevant matter for the Director-General under Schedule 6 Clauses 26.
- 3.88 If the Friends have a view that the NES-F Regulations are relevant to the overall Belmont Development Project, then that is a matter that can be addressed at the substantive application stage when Winstone Aggregates will be seeking all necessary resource consent approvals.

Paragraph 75: *“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.”*

Response

- 3.89 This application is made as a preliminary step for resource consent, to allow for the Director-General to prepare a report. Consideration of adverse effects on the environment will be addressed as part of the resource consent approvals that will be sought under the substantive application.

Paragraph 76: *“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.”*

Response

- 3.90 The modification of hydrological drainage patterns is not proposed as part of Land Exchange application to the Director-General. This application is made as a preliminary step for resource consent, to allow for the Director-General to prepare a report. Consideration of adverse effects on the environment will be addressed as part of the resource consent approvals that will be sought under the substantive application.

Paragraph 79: *“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 report, 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.”*

Response

- 3.91 Winstone Aggregates has commissioned a wide range of expert reports, which are publicly available on the Government website:
- a) <https://www.fasttrack.govt.nz/projects/belmont-quarry-development/land-exchange-application>
- 3.92 Winstone Aggregates considers that its consultants' reports are appropriately detailed, based on relevant information and appropriate methods. We disagree with the suggestion that the reports are brief, superficial, misleading and incorrect, and note that no expert reports have been provided by the Friends that contradict the reports submitted by Winstone.

Paragraph 81: *"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 proposals would destroy 50 to 80 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."*

Response

- 3.93 These matters are addressed in Reports: B1 Blue Green Ecology, B3 Blue Print Ecology, B3 Boffa Miskell, B4 Greenaway and Associates. The methods and results of those reports was relied upon in preparing the Comparative Assessment of Conservation Values in Wikaia (2025). That Assessment concludes that the project will 'provide a net conservation benefit'², while acknowledging that for some values (i.e. bats, archaeology) there is no change.
- 3.94 The proposed land exchange will not destroy or damage any ecological values in the exchange areas. Any impact on ecological values will be assessed separately at the substantive application stage.

Paragraph 82: *"The proposal would provide short-term economic gain for a private company, at the expense of public recreation and conservation for generations to come."*

Response

- 3.95 Market Economics (2025:B8, p.23) identifies the economic effects extend beyond the quarry operation and that the land exchange would generate significant net economic benefits at the regional level, including maintaining the local supply of aggregate required for construction and infrastructure and avoiding increased reliance on imported aggregate.

² FTAA 2024, Schedule 6, Clause 24, particularly subclauses 24(a) and 24(b).

- 3.96 The methods and results of Market Economics (2025:B8) were relied upon in the preparation of the Comparative Assessment of Conservation Values in Wikaia (2025) and are adopted here.

Paragraph 83: *“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”.*

Response

- 3.97 The Land Exchange report (Wikaia, 2025) sets out the relevant statutory tests and provides evaluation against each point. Whether the application is ‘not for the good of New Zealand or New Zealanders’ appears to be an incorrect interpretation of the relevant tests in the FTAA 2024 at Schedule 6 Clause 29.

Paragraph 84: *“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.”*

Response

- 3.98 The spatial size, extent, layout, and orientation of the OBDA is carefully and iteratively designed with numerous factors in mind, including feedback from extensive consultation, geotechnical engineer, operational functions of machinery, and including but not solely to minimize effects on terrestrial biodiversity. It is likely that if the footprint shifts that there will be adverse effects on other matters as a consequence of redesigning the OBDA proposal.
- 3.99 In any event, the effects of the proposed OBDA will be addressed as part of Winstone’s substantive application for resource consents and other approval types, and these effects are not relevant to the land exchange.

Paragraph 85: *“Furthermore, the FoBRP would strongly request that, if a land exchange were to be approved, the actual exchange would not be executed unless the substantive application were also to be successful.”*

Response

- 3.100 Winstone Aggregates has filed the report with the Director-General per section 33 of the FTAA 2024. This is done as a preliminary step to a Substantive Application being made. The proposed land exchange and resource consents will be considered concurrently by the Panel. On that basis, the Land Exchange does not need to be conditional on the Resource Consent (including Wildlife Permit and Archaeological Authority), as they will be considered concurrently. The Land Exchange is able to be granted independently of the necessary resource consents, if the panel concludes that it meets the statutory tests.

Paragraph 86: *“Also, the land exchange report states that “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.”*

- 3.101 Winstone Aggregates has filed a submission on the Proposed Lower Hutt District Plan, which is publicly available on council's website. The submission identifier is PDP/444.
- 3.102 There is no requirement to undertake a plan change under the RMA in advance of lodging a substantive application for RMA approvals under the FTAA 2024.
- 3.103 Considering that the submissions (and further submissions) period has closed, there is no ability (or obligation) to make additional submissions on this matter, which is before the independent hearings panel. There would be no utility in Winstone being required to seek a plan change when the points raised by the FOBRP are already submission points that will be addressed in the plan making process for the Proposed Lower Hutt District Plan.

Transpower New Zealand

- 3.104 Transpower New Zealand Ltd ('Transpower') provided comment on the proposal, in the form of a letter from A. Ecclesfield dated 24th February, 2026.
- 3.105 In summary, Transpower stated
- a) *'Transpower has previously outlined in a letter to Winstone Aggregates, that Transpower has no concerns with the proposed land swap at Belmont Quarry. The content of the letter to Winstone Aggregates regarding this matter remains accurate. I understand the Department is likely to have seen this letter as part of the land exchange process. For completeness it is attached.'*
- 3.106 We have no additional comments in response to the Transpower letter (24/02/2026) beyond what is already stated in the Land Exchange Application (Wikaia, 2025: C1). This reflects the consultation undertaken with Transpower.

Firth Masonry

- 3.107 Firth Masonry provided a letter with comments dated 25 February 2026.
- 3.108 In summary, Firth Masonry stated
- a) *'We have reviewed the land exchange application and are already familiar with the areas being proposed for exchange. We have no further comments on the land exchange and are fully supportive of the land exchange and the continued operation of Belmont quarry as a key regional supplier.'*
- 3.109 No further response is required beyond what is already stated in the Land Exchange Application (Wikaia, 2025: C1).

Fulton Hogan

- 3.110 Fulton Hogan provided a letter with comments dated 19 February 2026 and noted support for the proposed land exchange as a necessary step to ensure the ongoing viability of Belmont Quarry and the security of delivery for ongoing infrastructure delivery within the region.
- 3.111 No further response is required beyond what is already stated in the Land Exchange Application (Wikaia, 2025: C1).

Wellington Botanical Society

- 3.112 The Wellington Botanical Society (the 'Botanical Society') provided comment on the proposal. The letter is undated but was received in February 2026.
- 3.113 The Botanical Society notes their earlier letter of 18 September 2025.
- 3.114 In its written comment, the Botanical Society confirms its continued opposition to the proposal to swap DOC land for private land. The Botanical Society asserts that the DOC-Give land has high ecological value.
- 3.115 The matters raised by the Wellington Botanical Society regarding the presence and habitat of maire tawake (*Syzygium maire*) do not introduce new information.
- 3.116 The species was identified through the ecological field surveys undertaken by BlueGreen Ecology (2025:B1), with *Syzygium maire* recorded in the vegetation survey plots (BlueGreen Ecology 2025:B1, p.98). The ecological report also includes a detailed assessment of swamp maire presence and habitat within the DOC-Give area (BlueGreen Ecology 2025:B1, s9.3, pp.86 to 90).
- 3.117 Much of the written comment made by the Botanical Society focuses on potential and actual adverse effects on the environment as a result of the placement of overburden onto land, e.g. where the placement of fill would alter hydrological drainage patterns and the effects of that on Tawake survival. We consider this to be out of scope of this step in the process, which is a preliminary application made for the Director-General to prepare a report. This application (to the Director-General) does not seek permission to place soil onto land, or alter drainage characteristics of any land.
- 3.118 We note that Blue Green Ecology has prepared responses to the written comment made by the Botanical Society, which is outside of my area of expertise including but not limited to: species identification, species presence/absence in the proposed exchange area, the conservation status of any species, habitat preferences for any species, the likelihood of success of restoration efforts or translocation, habitat types in the Wellington Region, effects such as changes in hydrology or pathogens (e.g. myrtle rust), flowering and fruiting, and or evaluation of biodiversity value of exchange land.

4 Conclusion

- 4.1 This memo has been prepared Wikaira Consulting (with support of Derive Consulting) who have expertise in planning and engagement. It responds to comments received by DOC during the consultation process required under the FTAA 2024. The paper addresses matters of consultation, engagement, and planning arising from the comments of invited persons and groups, including Ngāti Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika, the Friends of Belmont Regional Park, Greater Wellington Regional Council, Hutt City Council, the New Zealand Conservation Authority, the Wellington Conservation Board, the Wellington Botanical Society, QEII National Trust, the New Zealand Transport Agency, Heritage New Zealand Pouhere Taonga, and commercial interests including Firth Masonry and Fulton Hogan.
- 4.2 Several parties adopted neutral positions on the proposed land exchange, including Hutt City Council, QEII National Trust, and Ngāti Toa Rangatira. Commercial submitters expressed support for the proposal. Concerns were raised by the Friends of Belmont Regional Park, the New Zealand Conservation Authority, the Wellington Conservation Board, and the Wellington Botanical Society. The key issue raised by those parties is whether the proposed exchange would deliver the net conservation benefit required under the Act, given that a portion of the land proposed for acquisition by the Crown is already subject to QEII open space covenants. Concerns were also raised regarding recreation values of the land to be exchanged, the economic benefits of the proposal were not disputed.
- 4.3 In response, Winstone Aggregates relies on its commissioned expert reports (both in the original application and in response to written comments), which conclude that the exchange would deliver a net conservation benefit when assessed in accordance with the FTAA 2024. Winstone Aggregates maintain that the inclusion of QEII-covenanted land in the comparative assessment is available under the FTAA 2024.
- 4.4 Those matters, and the specific points raised by each party, are addressed in the body of this memo.