

Response to comments on draft Belmont Quarry land exchange report

Author:	Michael Harbrow
Discipline:	Recreation
Date:	28 June 2026

1. Introduction

I reviewed the Applicant's December 2025 Recreation Assessment prepared by Rob Greenaway of Rob Greenaway & Associates, along with other relevant information provided by the Applicant. I also undertook site visits to the area on 3 and 10 April 2026.

I prepared a Statement of Advice for the Department of Conservation (DOC) dated 21 April 2026 and have read Mr Greenaway's response to that document. I have also read the Friends of Belmont Regional Park's (FoBRP) comments and the Applicant's planner's comments on DOC's draft report concerning the land exchange. I respond to several matters raised in these comments 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 21 April 2026 Statement of Advice for DOC.

2. Response to comments from Friends of Belmont Regional Park

FoBRP have provided six comments relating to the assessment of recreational values in the comments on the draft Land Exchange Report, dated 14 June 2026. I respond to each of these below.

1. *"...the proposal to plant swamp maire in the Southern Gully parcel ignores the recreation values of the park. Whether 200 or 1800 specimens are planted, it would be a considerable loss from a recreation perspective, since none of them will be accessible to park users. Even if the re-planting would be successful; the swamp maire wouldn't even be visible at a distance."* (p5).

I agree that the planting of swamp maire in the Southern Gully with the difficult access as originally proposed would not address the loss of recreation value for those who value its presence in the more accessible DOC-Give land. The Applicant has now offered further improvement packages in response to the draft Land Exchange Report and is proposing that public access would be provided to

the Southern Gully from Liverton Road. This proposal would improve the accessibility of the restoration plantings, however, the Southern Gully will offer a lower quality recreation experience given it is a narrow corridor between the quarry land and lifestyle blocks, that has had a degree of human modification. The proposed access off Liverton Road is discussed further under Improvement Package A, below.

2. *"The draft report states that there is "no net gain for biodiversity - flora and recreation" but FoBRP believes this understates the case : there would in fact be a significant net loss in recreation value, mainly from the loss of the special upland wetland habitat that is unique to the park, and indeed the Wellington region. FoBRP recommends that the DoC final report make clear that there would be a net loss of recreation values, not just "no net gain". (p5).*

The contribution of heritage and biodiversity values to the visitor experience is already considered as a criterion in the assessment of recreation values for the DOC-Give and DOC-Get land. There are many opportunities to explore areas off track in a bush setting in the Hutt Valley and in the wider region and in that sense, the experience offered in the DOC-Get land is not exceptional. Instead, the area is particularly valued by a small group of knowledgeable visitors who are aware of the significance of the wetland habitat and species present.

3. *"Page 27 of the draft report states that "If the land exchange goes ahead, public access to these blocks will be enabled resulting in a future recreation value of Low." Bearing in mind that there is no expectation that the DoC-get areas would be incorporated into the Park, and that physical access to much of the land would not be possible, we contend that the future recreation value of those lands would be nil. There can also be no public access from Liverton Road." (p5).*
4. *"FoBRP recommends that p27 of the final report be amended to make clear the nil recreation value of the DoC-get areas. Even if these lands were to be incorporated into the Park, quarrying activities and extremely steep terrain would make physical access impossible for much of the DoC-get areas." (p5)*

The assessment of overall recreation value is based on a number of criteria, outlined in my previous Statement of Advice. Level of access is only one of these. All criteria were rated on a scale from low to high and contributed to an overall rating for the DOC-Give and DOC-Get lands. The difficulty of access to the DOC-Get land is acknowledged, but given access would be difficult, but not physically impossible, I do not consider that a nil value would be appropriate. I also note that

access to the DOC-Get land would now be improved to some degree with the addition of public access from Liverton Road.

The impact of the adjacent quarry, previous quarrying and overburden disposal in some of the DOC-Get land, and the steep terrain are also considered in the assessment, particularly in terms of their potential effects on future use-levels for the DOC-Get land.

5. *“The recreation section considers only physical on-site matters but does not consider the landscape as viewed by recreators. As with the landscape assessment, the recreation assessment ignores the effect on track users beyond the boundaries of the DoC-give and DoC-get areas (p5).”*

This concern was raised in previous comments on the application from FoBRP and is addressed in point 54 of my previous Statement of Advice (p15). As it relates to the effects of future development of the land, rather than effects arising from a change of ownership, it is not appropriate to comment on this issue in assessing the land exchange application.

6. *“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.” The FoBRP recommends that the above suggestion be made a condition of the application to ensure that the most valued and important parts of the DoC-Give area would then be excluded from the proposed land exchange. That part would thus remain under DoC ownership, continue to be part of the Park, preserve public access and preserve the most significant conservation values of the lands in question. (p8,9).*

I agree that this suggestion would retain some of the recreational value of the DOC-Give land. However, it would represent a different land exchange proposal to the one being assessed and is outside the scope of my advice.

3. Response to comments from Winstone Aggregates

Comments relating to the assessment of recreational values in the draft Land Exchange Report, have been provided by the Applicant in a planning memo and technical memo on recreation. I respond to the two proposed improvement packages, separately following my response to these comments.

3.1 Planning memo

Two issues were raised in the planning memo, “*Belmont Land Exchange Application – Response to draft DOC report*”, dated 15 June 2026 prepared by Jade Wikaira, Wikaira Consulting Limited.

1. *“Recreation (Appendix 4E) relies on informal pest-control lines as recreation value. Those lines do not meet the track construction standard DOC itself provided to Winstone at the pre-application stage, and cannot fairly be treated as recreation assets.” (p6).*

The track construction standards that are used by DOC and other organisations, guide the construction and maintenance of tracks, where they have chosen to provide managed facilities for use by recreational visitors. Standards are used to ensure that safety and quality of experience are managed at a level appropriate to the predominant visitor group.

Facilities, such as tracks, are only one component of a recreation experience, and are not a prerequisite for a location to have recreational value. The public has a right of access to public conservation land, with or without tracks.

Many activities take place in the absence of formal tracks, and some visitors intentionally seek out experiences where there are no or only limited facilities provided. This may be to experience a less modified environment, a more physically challenging experience, fewer people, or to visit locations of interest to them, including those with biodiversity or heritage value.

The presence of informal tracks and the use and maintenance of pest control lines for access reflect the recreational value that some members of the community have placed on the DOC-Get land. In my view, an assessment that only considered the use of managed facilities would be unduly narrow.

2. *“..the rec report imports 'social licence' as an assessment criterion and rates it Low. That finding rests almost entirely on a single opposing comment, from the Friends of Belmont Regional Park. Social licence was not raised with Winstone at any point during the approximately six-month pre-application process. Assessing it properly would require evidence, which DOC has not commissioned. A social licence conclusion drawn from one comment, introduced late and without that analysis, is not soundly based. The exchange*

is not appropriately (or correctly) assessment on the balance of support and opposition; which to do so would ignore the statutory tests.” (p6).

Technical assessments were undertaken in accordance with the Department’s “*Internal guidance for conservation values assessments for land exchanges under the Fast-track Approvals Act.*” Social license for exchanging away the DOC-Give land and acquiring the DOC-Get land was considered in the context of the recreation opportunities accorded by each. However, it was not a conclusive factor in the overall assessment.

I note that there was no evidence of any community interest in greater recreational access to the DOC-Get land and some opposition to the loss of the DOC-Give, but overall, there were few comments from invited submitters that related specifically to recreation values.

3.2 Technical memo on recreation by Rob Greenaway

A further memo dated 15 June 2026 has been provided by Rob Greenaway responding to points made in the draft Land Exchange Report and my Statement of Advice. These relate to recreation values and the recreation opportunities of the proposed land exchange.

Mr Greenaway acknowledges my concerns with the annual estimate of 6,570 uses of the Buchanan Road Tramping Track which were derived from a short-term visitor counter and Strava data. He notes his overall recreation assessment was cross-checked against other data sources and that these data sources are consistent in indicating that Buchanan Road and the adjacent DOC-Give land are relatively lightly used compared with the main park entrances and track corridors (points 8 & 9, p2). I agree with this assessment.

I also agree with Mr Greenaway that off-track exploration, including use of predator-control lines, is inherently difficult to quantify and typically associated with low-intensity specialised use, and that its presence can add diversity and interest for a small group of experienced users (point 11, p3).

I discuss the values of the DOC-Give land within the wider recreational setting of Belmont Regional Park. I also note the lower level of use of the Dry Creek entrance, compared to the significantly more popular park entrances at Hill Road and Cornish Street. However, for the purposes of assessing the land exchange, a comparative assessment of the recreation value of the DOC-Give and DOC-Get land is required, rather than a comparison between the DOC-Give and other

areas of Belmont Regional Park. I remain of the view that the DOC-Get land is of lower recreational value.

The network of well used and maintained predator control lines and informal trails within the DOC-Give land indicates a level of use and community value, which is supported by the comments on the application from FoBRP. The fact that these trails may be informal or unsanctioned does not invalidate the level of use or the recreational value that people may attach to the area. I also note that FoBRP has roped off specimens of swamp maire, ramarama and *Coprosma rubra* to allow them to be viewed whilst protecting their fragile root systems. This would not be necessary if there were only very low levels of visitation to the DOC-Give land.

The site visits by myself and Mr Greenaway were undertaken several months apart during which time Winstone Aggregates lodged their application for land exchange. The routes that I observed in April 2026 were either not present or not observed at the time of Mr Greenaway's visits in June to September 2025. I note that winter and early spring would likely have been the time of lowest visitor use of the park. The routes were also not disclosed to Mr Greenaway by Greater Wellington Regional Council in April 2025 during preparation of his assessment.

Mr Greenaway contends that the more defined routes have been developed recently and most likely in response to heightened community interest in the Winstone land exchange proposal (point 15, p5). My assessment has been made from observations during my own site visits and the information that is currently available, and in my view reflects how the site is currently used and valued. I cannot speculate on conditions prior to my engagement with the application.

Mr Greenaway disagrees with the medium access rating given to the DOC-Give land in my assessment on the basis of a relatively long and physically demanding 1.7 km uphill approach along the Buchanan Road Tramping Track. He compares this to the ease of access to areas reached directly from main park entrances and car parks (point 19, p6).

I consider that this significantly overstates the difficulty of the walk along the Buchanan Road Track to the DOC-Get land. In my original assessment I also noted that there is a clear difference in the ease of access to and within the DOC-Give land compared to the DOC-Get. Even with the proposed access from Liverton Road, this still applies with respect to the Dry Creek and Firth Blocks, and part of the Northern Gully. I discuss the impact of the new proposed access to the Southern Gully under Improvement Package A, below.

In my report I described the initial 1.7 km of the Buchanan Road Tramping Track as a gravel 4WD road. Mr Greenaway correctly points out that this part of the

track is a “*Transpower service route formed and maintained for network access under statutory powers, with vehicle use generally limited to Transpower and GWRC staff*” and that “*it is not promoted or managed as a public 4WD recreation opportunity, and 4WD recreationists would not be able to access the track because there is a locked gate at the bottom of the hill*” (point 20, p6). I did not consider public 4WD access when rating the accessibility of the DOC-Give land, however I agree that it would more appropriately be described as a “gravel service road (that is generally limited to Transpower and GW vehicles).”

Finally, Mr Greenaway makes comments regarding social license which are also repeated in the planning memo prepared by Jade Wikaira. I have addressed these comments in my response to the planning memo, above.

3.3 Winstone Aggregates Improvement Package A

Improvements offered

Improvement Package A is premised on the pre-amendment version of section 29(2) of the Fast Track Approvals Act 2024 applying to the land exchange. Under that scenario, the values associated with the QEII covenant are not discounted.

In addition to the improvements offered by Winstone Aggregates as part of the land exchange application on 10 December, Improvement Package A would include:

- an increase in mammalian pest control from 5 to 10 years
- an increase in the number of ramarama included in plantings in the Dry Creek Block,
- provision for public access onto the DOC-Get land via the right of way to the Southern Gully off Liverton Road.

Feedback on Improvement Package

The applicant proposes that Improvement Package A would allow for mana whenua involvement in restoration activities and for visitors to directly experience the restoration plantings and would ensure there are opportunities for access and community involvement.

The Department would consider planting and restoration activities undertaken by mana whenua or appropriately authorised volunteer groups to be

conservation management activities. We would therefore expect to be able to use the right of way off Liverton Road for this purpose already under the terms of 10 December proposal. I do not consider that the opening up of the right of way to wider public use under Improvement Package A would confer any additional advantage for these activities.

Allowing access to the DOC-Get land from Liverton Road for recreational users would improve the recreational value of the proposed exchange by offering legal and practical access into the Southern Gully, the proposed plantings of swamp maire and the Northern Gully. It is also possible that this access could improve linkages with other areas of Belmont Regional Park, but I note that the terrain at the end of the Northern Gully is steep. If visitors are encouraged to use this area, fencing would need to be installed to discourage people from entering the quarry and overburden disposal areas from the Northern and Southern Gullies.

Liverton Road itself is a narrow access road that is single lane for much of its length. It has a number of blind corners and limited places for vehicles to pass. It is therefore poorly suited to supporting visitor use of the DOC-Get land.

Conditions

As managing a new access point at this location would not be a strategic priority for DOC and would impose additional costs on the Department, or other parties who may manage the area in future, it is important that these costs are borne by the Applicant. The following additional conditions are proposed.

1. A stile should be installed alongside the existing locked gate on Liverton Road, along with entry signage and a large orange triangle marker at the boundary of the DOC-Get land.
2. Within the Southern Gully a route should be marked and maintained by the applicant to direct visitors away from wetland areas and the vulnerable roots of the new plantings of swamp maire and other species.
3. The boundary between the Southern and Northern Gully blocks and the quarry land should be fully fenced at the applicant's expense with fencing funded and maintained by the Applicant. The same should apply to the boundary between these blocks and the adjacent private land.

4. If DOC is to manage the DOC-Get land, separate from Greater Wellington's management of Belmont Regional Park, DOC signage indicating the reserve name should be placed in the following locations to make the public aware of ownership and right of access:
 - At the boundary of the Southern Gully Block facing Liverton Road
 - On the Hebden Crescent frontages of the Firth and Dry Creek Blocks
 - On the existing easement on the Dry Creek Loop Track within the Dry Creek Block.
5. All assets described above should be funded, owned and maintained by the Applicant.

What is the conservation value rating of Package A

I consider that Improvement Package A would increase the "level of access" rating for the DOC-Get land from Low to Low-Medium. I note however, that the road access is relatively poor and that the right-of-way off Liverton Road would only enable improved access to less than half of the area of the DOC-Get land. The Firth and Dry Creek Blocks would remain difficult to access.

The swamp maire plantings in the Southern Gully would likely be of interest to some of the same visitors who currently access the DOC-Give land along with residents of the immediate area. However, the Southern Gully is a thin strip of highly modified land, parts of which are overrun by blackberry, located between lifestyle blocks on one side and the quarry on the other. The Northern Gully beyond is also modified with part having previously been used for overburden disposal.

The quality of experience will improve over time as weed control is undertaken and plantings establish, however, it is unlikely to provide a high quality visitor experience. I consider that it is unlikely to attract significant visitation given the range of other opportunities in Wellington and the Hutt Valley, the experience offered, and the difficult road access. My assessment of potential use of the DOC-Get land therefore remains low.

Improvement Package A does not change my assessment of other criteria for rating recreation value, and my overall assessment is that the recreation value of the DOC-Get land remains low.

3.4 Winstone Aggregates Improvement Package B

Improvements offered

Improvement Package B is premised on the post-amendment version of section 29(2) of the Fast Track Approvals Act 2024 applying to the land exchange. Under that scenario, the values associated with the QEII covenant are discounted.

In addition to the improvements offered in Improvement Package A and the 10 December land exchange application, Package B includes:

- additional planting of 200 ramarama and 200 swamp maire in two areas of the Dry Creek Recreation Reserve within Belmont Regional Park that are adjacent to the DOC-Give area.
- 5 years of weed management and 10 years of pest management in the Regional Park to assist with establishment of these plantings.

Feedback on improvement package

I have no comment on Improvement Package B as it is likely to have only a minimal effect on recreational values beyond what is proposed in Improvement Package A.

Conditions

No further conditions are recommended beyond those outlined for Improvement Package A

What is the conservation value rating of Package B

The improvements in Package B would have a negligible impact on recreation values beyond those offered in Improvement Package A. My assessment of the recreation value of the DOC-Get land under Improvement Package B is that it remains low.

5. Recommendation

My overall view of the conservation value of the DOC-Give and DOC-Get land is unchanged.

I consider the DOC-Give land to have low-medium recreation value and the DOC-Get land to have low recreation value.