

From: s7(2)(a) <s7(2)(a)>

Sent: Thursday, 18 September 2025 10:22 am

To: Jack Mace <[Jack.Mace@gw.govt.nz](mailto:Jack.Mace@gw.govt.nz)>

Cc: s7(2)(a) s7(2)(a) Quentin Duthie

<[Quentin.Duthie@gw.govt.nz](mailto:Quentin.Duthie@gw.govt.nz)>

Subject: Belmont Regional Park land-swap proposal: updates

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Dear Jack,

I'm writing on behalf of the Friends of Belmont Regional Park (FoBRP), about the proposed land-swap with Winstone Aggregates (WA). As you'll be aware, the land that WA want to acquire is public land, part of a Key Native Ecosystem, owned by DoC, and managed by GWRC. WA have claimed that the park land is of low ecological value, but that is clearly not the case.

DoC are currently considering whether to accept or decline WA's proposed land-swap, and GWRC will be asked to comment to DoC on that. The FoBRP have been working hard over the last year to better define the ecology of the park land in question, and have discovered some important species that the WA's own eco-surveys appear to have missed entirely.

We (FoBRP) want to ensure that GW is aware of all these findings, and our concerns about the land-swap, to better inform their comments to DoC.

Initially, I'll present the main points here, but we would be glad to call in and talk to the key people in person at any time. We're also greatly aware of the urgency of all of this, and would be happy to take any GW or DoC staff in to see the area for themselves. The botanical findings seem to be increasing by the week, and are all visible on iNaturalist, eg via this link (with a couple of screen-grabs attached to this Email) :

[https://inaturalist.nz/observations?nelat=-41.15761972540405&nelng=174.96253765218174&subview=map&swlat=-41.163467809823835&swlng=174.95200764127532&iconic\\_taxa=Plantae](https://inaturalist.nz/observations?nelat=-41.15761972540405&nelng=174.96253765218174&subview=map&swlat=-41.163467809823835&swlng=174.95200764127532&iconic_taxa=Plantae)

In summary :

- Currently 16 observations of Swamp Maire (Threatened - Nationally Vulnerable)
- 20 observations of Ramarama (Threatened - Nationally Critical)
- these populations are well protected here. Nationally they are both at risk from Myrtle rust.
- WA have recently reduced the area they wish to use, to avoid the first of these Swamp Maire populations, but may not be aware of the rest
- To protect these swamp-loving plants also requires careful conservation of their upstream water catchments.
- We have also found Coprosma rubra (At Risk – Declining)
- **Overall, the area in question has a rich diversity of plant life, with 98 species noted so far**
- **In particular, the shallow valley trending SSE towards the large pond is a particularly rich and valuable habitat**
- Potentially, that area could become the perfect focus for a new walkway, which would significantly enhance community connection.
  
- The DoC/GWRC land in question is not just regenerating farmland; it is part of a KNE which contains original landforms, wetlands and streams, and incised gullies with original native forest. This land is protected by a well-maintained network of bait-lines.
- The proposed land-swap would destroy the original landforms and fragment the structure of this part of the regional park
- Two parcels of the WA land proposed for the swap are already protected by a QEII covenant
- The QEII protection was a resource consent requirement for a previous quarry expansion. It has already been traded for other land.
- **The proposed land-swap does not offer any net ecological gain, but instead a significant ecological loss.**
- Should the land-swap and fast-track proposal go ahead, the FoBRP would be extremely concerned about the financial burden that would be placed on public funds for remediation, should WA, their parent company, or a later new owner, fail. A significant bond would need to be set aside to counter that possibility, but we have seen no mention of that in the WA proposals.
  
- **The recreational value of Belmont Regional Park would be significantly reduced by the land-swap**

- Access to the QEII-covenanted WA land would be impossible, given that the access from the north would be blocked by WA earthworks, and access from the south is too steep to access (the GW contractors even find it challenging).
- WA have recently stated that "*We see genuine ecological and community value in this land becoming part of the Belmont Regional Park, creating more space for everyone to explore, connect with nature, and enjoy for generations to come.*". But that could not work if the area is inaccessible.

Thank you for considering this and bringing it to the attention of those in GWRC who will be commenting to DoC. We look forward to your response and repeat our offer to help GWRC in any way we can.

Kind regards,

s7(2)(a) [REDACTED], for Friends of Belmont Regional Park  
s7(2)(a) [REDACTED]

cc'd : Quentin Duthie, s7(2)(a) [REDACTED] (FoBRP Convener) & s7(2)(a) [REDACTED] (FoBRP Secretary)

