

FTAA-2607-1262

Belmont Quarry Substantive Application

25 September 2026

Environmental Protection Agency

RE: Response to Further Information Request under section 46(2A)

Tēnā koe,

Thank you for your letter dated 2 September 2026 requesting further information to support the EPA's assessment of completeness and scope under section 46 of the Fast-track Approvals Act 2024. We have reviewed the matters raised and provide the following responses:

Resource Consent – Schedule 5 information Requirements

- 1. Please provide the full names and addresses of each occupier of the site and adjacent properties, as required by clause 5(1)(d)(ii). Alternatively, please confirm that no occupiers were identified after reasonable inquiry.***

Winstone has undertaken reasonable inquiry to identify the full names and addresses of occupiers of the site and adjacent properties, as required by clause 5(1)(d)(ii). As part of the earlier land-exchange process, Winstone carried out door-knocking of neighbouring residential properties to confirm occupiers and ensure they were aware of the proposal. The list of known occupiers from that engagement is included in Appendix B.15.

In response to the EPA's request, Winstone has completed a further desktop review of publicly available information to confirm current owners and ascertain the details of occupiers of adjacent land where these differ. Letters were issued on 10 September 20026 to all identified properties, including both the land-exchange occupiers and those identified through the updated desktop review. A copy of the letter and the list of addresses contacted is attached.

As of today's date, none of the responses received have identified any additional occupiers, and this has been recorded in an updated Appendix B.15, a copy of which is attached. The Consultation Report in Appendix A4 of Part A has also been updated to reflect this. If any additional occupier information is received following this correspondence, Winstone will provide this to the EPA and update Appendix B.15 accordingly. Where it has not been possible to identify occupiers of adjacent properties, Winstone confirms that it has made reasonable inquiries to identify those occupiers but has been unable to do so.

- 2. In accordance with clause 5(1)(f), please confirm if any other resource consents are required for the project to which the consent application relates, and if so, provide a description of these and whether the applicant intends to seek these via the Fast-track Approvals Process.***

We have reviewed the reasons for consent outlined in Section B13.1 of the substantive application and confirm that it incorrectly omits Lot 10, and the reason for consent under the LHDP Rule 11.24(j) should include lot 10.

The correct reason for consent should read:

- *Subdivision that is not a Permitted, Controlled or Restricted Discretionary Activity, is a **discretionary activity** in accordance with Rule 11.24 (j). In this case the proposal includes subdivision in the General Rural Zone, however the proposal does not meet the controlled activity standards and terms (11.2.2.1 (a) with respect to Allotment Design for subdivision in the General Rural Zone, as the Minimum size of the allotment is below 15ha for Lots 6, 9 and 10. [emphasis added]*

Similarly, under the P-LHDP, Lot 10 should be specifically included within B13.1. The subdivision to create Lot 10, along with all other lots, requires consent under SUB-R4, and no consent is required under SUB-R1. While each lot created requires consent under SUB-R4, the specific standards that are not met vary between lots. For clarity, the reasons for consent have been corrected and updated to separate out the lots, and are as follows:

- Subdivision in all zones that creates a vacant allotment that does not comply with the standards requires consent as **restricted discretionary activity** in accordance with Rule SUB-R4. In this case, the subdivision of the overburden disposal site (OBDA) and Haywards Quarry to create Quarry sites Lots 3, 5, and 101 will not meet the following standards:
 - S4 – Water
 - S5 – Wastewater
 - S6 – Stormwater
 - S7 – Power
 - S8 - Telecommunications

In this case, no services are proposed to be provided for proposed OBDA Lots 3 and 5 or 101 (and there is no minimum allotment size for the zone).

- Subdivision that creates a vacant allotment that does not comply with the standards S2-S9 requires consent as **restricted discretionary activity** in accordance with Rule SUB-R4. In this case, the subdivision to create DoC Get Lots 1, 2, 4, 8 or 100 of the will not meet the following standards:
 - S4 – Water
 - S5 – Wastewater
 - S6 – Stormwater
 - S7 – Power
 - S8 - Telecommunications

In this case, no services are proposed to be provided as part of the subdivision for proposed for Lots 1, 2, 4, or 100 (and there is no minimum allotment size for the zone).

- Subdivision that creates a vacant allotment that does not comply with standard S1 requires consent as **discretionary activity** in accordance with Rule SUB-R4. In this case, the subdivision to create DoC Get sites Lots 6, and 9 will not meet the following standards:
 - S1 – Allotment Size (with respect of the General Rural Zone).

In this case, Lots 6 and 9 do not meet the minimum allotment size for the General Rural Zone of 15ha, being 12.63ha and 3.94ha respectively.

- Subdivision that creates a vacant allotment that does not comply with standard S1 requires consent as **discretionary activity** in accordance with Rule SUB-R4. In this case, the subdivision to create Quarry site Lot 10 will not meet the following standards:
 - S1 – Allotment Size (with respect of the General Rural Zone)

In this case, Lot 10 does not meet the minimum allotment size for the General Rural Zone of 15ha, being 0.5ha.

We provide the following assessment with respect to the omission of Lot 10:

Lot 10 is a residual parcel arising from the land-exchange process and comprises land that is not required for the DOC-Get conservation lots. The creation of Lot 10 reflects the land-exchange boundaries, and although it does not meet the minimum lot size of 15 ha for rural subdivision, its formation is simply a direct consequence of the land-exchange outcome and does not introduce any new rural activity or development potential beyond the existing environment.

Section B15.1 of Part B has been updated to include this assessment.

3. In accordance with clause 5(1)(g), please provide an assessment of the activity against section 7(ba) and 7(j) of the RMA

An assessment of section 7 Other Matters is provided in section B19.3 of Part B. Further to that assessment, and specifically with respect to sections 7(ba) and 7(j) of the RMA, we provide the following assessment:

Particular regard has been given to the efficiency of end-use energy (section 7(ba)), with the OBDA location minimising transport distances between extraction and deposition areas. This reduces unnecessary vehicle movements, fuel consumption, and associated emissions, ensuring energy is used as efficiently as practicable.

Section 7(j) is not directly engaged, as the Project does not involve renewable energy generation or infrastructure.

Section B19.3 of Part B has been updated to include this assessment.

4. In accordance with clause 5(1)(h) (and also clauses 5(2) and 5(3)), please provide an assessment of the activity against the above provisions that have been deemed relevant by Greater Wellington Regional Council.

- *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.

Section B13.4 of Part B incorrectly referenced Regulation 45A as a reason for consent for the ecological offset works. We acknowledge this error in the reasons for consent. However, the underlying NES-F assessment in section B17.3 remains correct, with the ecological offset works assessed against Regulation 54.

As outlined in section B17.3.2, Regulation 45A is relevant to the disposal of overburden, whereas Regulation 54 applies to the works required to establish the wetland offset site. This distinction was correctly reflected in the NES-F assessment, notwithstanding the referencing error in section B13.4.

Section B13.4 has now been updated to correct the reference, and section B17.3.2 has been refined to more clearly distinguish the applicable regulations for each consent. No changes to the assessment itself are necessary.

- *Rule R151 of the Natural Resources Plan for the Wellington Region (NRP)*

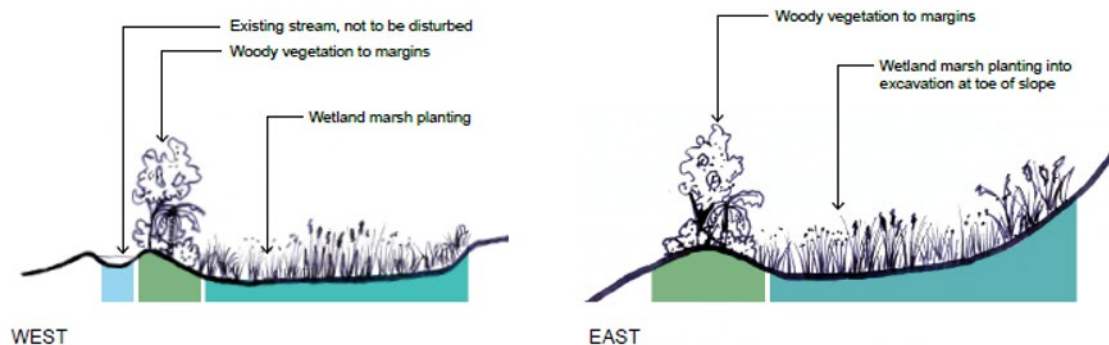
Paragraph 125 of the substantive application documents state that redirection of tributaries will be required as part of works associated with the creation of new wetland habitat within the Belmont Regional Park. The Applicant has assessed Rule R151 in regard to the stream and wetland reclamations and associated damming and diversion but has not assessed this rule in regard to the wetland creation works.

Paragraph 125 of the substantive application refers to the potential redirection of tributaries as part of establishing new wetland habitat within Belmont Regional Park. To address any uncertainties, further hydrological and ecological assessments have been undertaken, and confirm that no tributaries will need to be redirected, or damming or diversion occur for the creation of the wetland works.

The wetland creation works involve lowering two elevated terrace surfaces to facilitate natural wetland formation. These terraces are fed only by small local sub-catchments and do not receive flow from Speedy Stream or any of its tributaries. The proposed wetland base, sits above the elevation of nearby stream channels, meaning the works will not intersect existing waterways, will not alter channel form, and will not modify existing flow paths.

TYPICAL CROSS SECTIONS

Not to scale



The additional hydrological assessment further confirms that the wetland formation will rely on existing impeded drainage and localised surface water inputs, rather than any redirection, damming, or diversion of streams. The ecological assessment similarly confirms that the wetland creation footprint is entirely outside stream channels and does not require any modification to natural watercourses.

On this basis, consent is not required with respect to Rule 151 to deliver the ecological offset works. Section B8.5 and Paragraph 125 have been amended accordingly. The Hydrological addendum assessment is attached and is included in Part B as Appendix B5D.

- *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.

The application has sought consent under Rule 94 on the basis that a review of the GWRC mapping indicates the site is not within a site of significance, and because the discharge of cleanfill (being the deposition of overburden) does not meet the permitted activity conditions of Rule 80, specifically the volume thresholds in condition (e).

Following a meeting with GWRC on 17 September 2026, we understand that the relevant waterbody is the unnamed tributary of Te Awa Kairangi / Hutt River entering at approximately easting 1764760 and northing 5441110. On this basis, we accept that Rule 93 is the applicable rule for the discharge of overburden. Section B13.2 has been updated to reflect this.

GWRC advised that no further information is required. Reliance can be placed on the assessments already provided in the AEE and specialist reports addressing the management of overburden and associated effects.

- **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.

Respectfully, our position is that a separate consent under Rule R117 is not required. The application seeks consent under Rule R118 for the reclamation of the wetland as a non-complying activity, and our assessment is on the basis that the scope of works authorised under Rule R118 appropriately captures all associated activities, including the removal and translocation of swamp maire and ramarama required to facilitate the reclamation. However, if it were considered that consent is required specifically for the removal of indigenous plants (and consent is sought for all necessary reasons for consent), reliance can be placed on the assessments already provided in the AEE and specialist reports. These assessments address the ecological values of the affected vegetation, the proposed translocation methodology, and the associated effects, and include an assessment under the NES-Freshwater (see sections B14.4.2, B15.2.2, and B17.3.2).

5. *In accordance with clause 5(5)(a) please provide an assessment demonstrating compliance with the rules deemed relevant by Greater Wellington Regional Council.*

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**

Regulation 40 of the NES- F provides for permitted activities associated with scientific research, and we had not sought to rely on this as a permitted activity with respect of any monitoring activities. Monitoring consisting of installing and removing a piezometer within a wetland is proposed (see section B15.2.3 of Part B) and on the basis that the FTAA considers that this monitoring constitutes scientific research, we provide the following assessment with respect to Regulation 40:

- (a) The monitoring activity is of a nature that reasonably be undertaken to meet the general conditions on natural inland wetlands activities in Regulation 55.
- (b) The activity does not include formation of pathways, boardwalks, or another accessways.
- (c) The monitoring activity will not exceed a single area of 10m² or total area of 100m² within the natural inland wetland.
- (d) The monitoring activity does not include a discharge of water.

With respect to Rule 165, we have discussed this matter with GWRC and accept that this rule is a relevant consideration with respect of the installation of the piezometers as the definition of a bore includes investigating or monitoring the conditions below ground surface¹.

¹ Bore is defined in the NRP as:

A structure or hole in the ground constructed for the purpose of:

- (a) investigating or monitoring the conditions below the ground surface, or*
- (b) abstracting liquid substances from the ground, or*
- (c) discharging liquid substances into the ground.*

With respect to the undertaking of monitoring within upstream wetlands, we provide the following assessment of the activity against NRP Rule 165:

- **Rule R165: Investigation and monitoring bores – permitted activity**

The use of land and the associated diversion and discharge of water or contaminants for the drilling, construction or alteration of a bore for the purpose of investigation or monitoring the conditions below the ground surface is a permitted activity, provided the following conditions are met:

- (a) where the bore is located within a community drinking water supply protection area shown on Map 40, Map 41, Map 42 or Map 43, the depth below ground level will not exceed 5m, and
- (b) there is compliance with the NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock, and
- (c) a Wellington Regional Council bore/well log form is submitted to the Wellington Regional Council within one month of the bore being constructed, and
- (d) there is no flooding beyond the boundary of the property, and
- (e) where the bore is located within the Hutt Valley Aquifer Protection Zone shown on Map 48 the depth below ground level will not exceed 5m on land or 5m below the seabed in the coastal marine area, and
- (f) a discharge to water, or onto or into land where it may enter water meets the conditions of Rule R91, and
- (g) where the bore is located within the coastal marine area, the activity shall comply with the coastal management general conditions specified in Section 5.6.2, excluding conditions (b) and (c), and
- (h) the bore shall be decommissioned in accordance with NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock as soon as practical after the investigation and monitoring is completed, and
- (i) the bore is not associated with hydrocarbon exploration or production.

In this case, clauses (a), (e), and (g) do not apply given the location of the site. The installation and decommissioning of the piezometer can be undertaken in accordance with the required standards in clauses (b) and (h), and the applicant commits to submitting the bore/well log within one month of construction, as required by clause (c). In addition, the monitoring activity is of a scale and nature that it will not cause flooding beyond the boundary of the property (clause (d)), will not result in a discharge to water (clause (f)), and is not associated with hydrocarbon exploration or production as referenced in clause (i).

Section B14.4 of Part B has been updated to include this assessment.

- **Rule R159 of the NRP**

A process for managing dewatering during the earthworks associated with the disposal of overburden is discussed in Part 2.15 of the Draft Erosion and Sediment Control Plan (see Appendix A of the ESCP (Appendix B4.1)). On that basis, GWRC identified that Rule R159 of the NRP as potentially relevant, as it provides for dewatering as a permitted activity subject to compliance with the associated standards and conditions.

To clarify, the works associated with the disposal of overburden do not involve the take of groundwater. Any water requiring removal from excavations will be limited to incidental surface water accumulation (e.g., rainfall, runoff, or perched water encountered during earthworks), and will be managed in accordance with

the procedures set out in the Draft ESCP. As the proposal does not involve a groundwater take, reliance on R159 is not required.

Concession – Schedule 6 Information Requirements

In accordance with clause 3(1)(m), please provide confirmation that the written approval from Greater Wellington Regional Council included in Part E of the application is for all activities applied for as part of the Concession, or otherwise provide confirmation of the written approval relied on.

Winstone has continued discussions with Greater Wellington Regional Council regarding the written agreement required under clause 3(1)(m) of Schedule 6. GWRC has now confirmed its written approval for all activities applied for under the concession.

A copy of this approval is attached, and it replaces the material previously included in Part E of the substantive application. The Concession Application material in Part F has also been updated to reflect this, as the approval letter contained more detailed description of the activities and areas

Conclusion

We trust that the clarifications provided above address the matters raised in your letter and assist the EPA in confirming the completeness and scope of the application. Updated versions of the relevant application documents will be submitted to replace the corresponding sections of the substantive application.

Nāku noa, nā

Shalini Sanjeshni

Winstone Aggregates