

Before the Fast-track Panel

Under: Fast-track Approvals Act 2024

In the matter of: FTAA-2603-L003 – Belmont Quarry Project – Land Exchange

Statement of advice: Jeremy Head

Landscape

Independent consultant

26 May 2026

Introduction

1. My full name is Jeremy Everett Head.

Instruction

2. I have been requested to provide expert advice on behalf of the Director-General of Conservation for her section 35 land exchange report required to be prepared under the Fast-Track Approvals Act 2024, for the Belmont Quarry project land exchange application.

Qualification and Experience

3. I am an independent Consultant Landscape Architect based in Christchurch. I have a Bachelor of Landscape Architecture (Hons) from Lincoln University (1993) and am a registered member of the Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA). I have over 30 years' experience as a Landscape Architect including eight years experience working at Lucas Associates and four years experience working for WSP in Christchurch where I held the role of South Island Team Leader Urban Design. Otherwise I have been self-employed. My role in this project to date has included a peer review of the Applicant's Landscape Assessment and a site visit.
4. I have a good understanding of the Applicant's Landscape Assessment of the land exchange where the various land parcels are located around Belmont Quarry, Lower Hutt.

Code of conduct

5. Whilst it is acknowledged this is not an Environment Court Proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this advice is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of advice and expert opinion

6. My expert advice relates to the following:

- i. Adequacy of the Applicant's Landscape Assessment, including identification of any valued attributes that have not been assessed or have been insufficiently characterised.
- ii. Adequacy of the Applicant's assessment of effects on existing natural landscape character and its values with specific reference to any values that are incomplete, understated, or not addressed.

Material Considered

7. In preparing this advice I have reviewed and rely on the following documents as part of the land exchange application:
 - **Belmont Quarry Overburden: Land Exchange Landscape Assessment;** 1 December 2025 prepared by Rhys Girvan, Senior / Principal Landscape Planner, Boffa Miskell Ltd (Appendix B6a of Application).
 - **Terrestrial Ecological Report** (draft) prepared by Rhys Burns for Department of Conservation (April 2026)
 - **Freshwater Ecological Report** (draft) prepared by Jacob Williams for Department of Conservation (April 2026)
 - **Botany Ecological Report** (draft) prepared by Matt Ward for Department of Conservation (April 2026)
 - **Recreation Report** (draft) prepared by Michael Harbrow for Department of Conservation (April 2026)
 - **Heritage Report** (draft) prepared by Richard Nester for Department of Conservation (April 2026)
8. I have attended weekly Teams calls with Department of Conservation (DOC) experts since 11 March to contribute, share and discuss others' assessments of the different land parcels and their varied attributes. This has enabled me to better and more fully assess the landscape characteristics of each land parcel.
9. I undertook a site visit on 24 March 2026.

Summary

10. This statement of advice ('statement') has been requested by the Department of DOC to assist it with preparing the Director-General's report for the Fast-track Panel in respect of Winstone Aggregate's Land Exchange Application. Part of this statement considers the Applicant's landscape effects assessment prepared by Rhys Girvan of Boffa Miskell (the 'BML Landscape Report'). This statement includes a review of the Applicant's assessment methodology and findings regarding the valued attributes of the five land parcels¹ as they currently exist. I understand that any proposed changes to the land parcels that may occur in the future subject to the land exchange being approved are not within scope of this Application. Such changes may include vegetation removal and earthworks and its replacement with quarrying activity and in other areas the restoration and enhancement of natural landscape character. In this regard, the existing natural landscape character values of the various land parcels, and how the values of these land parcels contribute to the wider landscape forms the focus of this statement.
11. For ease of cross-referencing back to the BML Landscape Report where I provide comment on a point made, I include the page number from the BML Landscape Report in brackets (e.g. [XX]).

Methodology

12. A site visit was undertaken on 24 March 2026 where I was accompanied by Mr Girvan. We walked into the OBDA 'Give' block from near its northernmost and localised high point down to a point close to the parcel's southern boundary. We also walked into the 'Southern Gully' (Get) block from Liverton Road. We observed the 'Dry Creek' (Get) block from the existing Dry Creek quarry roading. We also observed all the various land parcels from the same or similar viewpoint locations in the wider contextual setting that Mr Girvan used in his Landscape Report.

¹ Referred to in the Landscape Report as: 'Dry Creek', 'Firth QE11 Block', 'Northern Gully' and 'Southern Gully' (4 x 'Get' blocks) and the 'Proposed Overburden Disposal Area' or 'OBDA' (the 'Give' Block).

13. The peer review methodology I have used is based on that set out in Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines (TTatM) and utilises information lodged by the Applicant and DOC. As such this statement is largely desktop-based, informed by a site visit. The widely accepted NZILA Seven-Point scale has been used to help describe the landscape quality, the same scale that Mr Girvan has used.
14. This statement forms an impartial and focussed appraisal of the BML Landscape Report and is not a parallel assessment.

Natural Landscape Character

15. In this statement I use the terminology 'natural landscape character'. This is not the same as 'natural character' which is an RMA term used exclusively for S6(a) matters – *'the preservation of natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development.'* While some land parcels include wetlands, (small) lakes and rivers and their margins, I use the term 'natural landscape character' to mean the distinct combination of each land parcel's natural characteristics and qualities, including its degree of naturalness. As mentioned above, a determination of levels of natural landscape character has been made based largely on available reporting both from the Applicant and DOC.

QEII Covenants

16. I understand that the areas mapped as QEII Covenant comprised partially modified landforms prior to the placement of the QEII covenants. They were not fully natural landscapes. Modifications included quarrying activity and earthworks and native planting to varying degrees. I understand that drainage works including earthworks to form artificial channels to control stormwater including inside the QEII covenant area at the Northern Gully land parcel was implemented prior to the covenants being put in place. I also understand from discussions with DOC experts, that while these covenanted areas are fully clothed in vegetation cover now, these areas are not highly natural and in terms of natural landscape character are little different to adjacent non-QEII areas. From my own site

observations, parts of the QEII covenanted areas still retain an expression of layered horizontal earthworks patterning (Firth Block). However, (any) areas protected via QEII covenant will by definition have higher associative shared and recognised values than areas that do not have this protection².

Points of Agreement with the Applicant's Landscape Report

17. In general, I agree with the content of Sections 1.0, 2.0, 3.0, 4.0 and 5.0.
18. The 'DOC-give' areas will not visually change much (if at all) when viewed from afar – especially to the layperson.
19. Putting the landscape quality of each land parcel to one side, the Firth Block and Dry Creek land parcels do not in my opinion contribute 'fragmentation' but rather would consolidate the broader vegetated setting.
20. The zone of theoretical visibility (ZTV) analysis is useful and accords with observations made during the site visit. Further, the limitations of ZTV analysis are correctly stated (Section 5.1).
21. The methodology in selecting public viewpoint locations is logical and represents an appropriate range of views (Section 5.2).
22. The BML Landscape Report considers the land parcels as they are now, and that any proposed physical changes would be assessed when the substantive proposal is applied for.
23. The BML Landscape Report is focussed on the physical, perceptual and associative attributes of the various land parcels, after which an evaluation is made. Visibility and landscape capacity of each land parcel are addressed separately. Regarding capacity, I agree with the discussion in the BML Landscape Report (Section 7.0) and note that capacity will be a relevant matter only when the substantive application is being assessed.

² QEII National Trust Open Space Covenant 5-07-755; Background (C) "*The Covenantor [Fletcher Concrete and Infrastructure Limited] wishes to protect and preserve **certain significant natural environmental values and open space values** on the Covenant Area as defined in this deed.*" (9 November 2025). My emphasis added in **bold**.

24. The solid line inside the heavier dashed line around the OBDA on the 'Belmont Quarry Land Exchange Concept Plan' represents an area that may or may not be physically modified in the substantive application.

Limitations / Information gaps

25. There is only brief mention of specific 'landscape natural character' (elements, patterns and processes), such as hydrology - how water flows across the land including to, over and downstream of the land parcels, a description of the wetland areas in terms of their natural quality, occurrence of mature / noteworthy native trees, levels of biodiversity and their respective values. A more detailed / nuanced acknowledgement (including reference to other's reporting) to these valued attributes would help influence / underpin / strengthen the subjective aspect of the overall evaluation of natural landscape character.
26. To help the Panel, it would assist readability if the A3 photographic viewpoint graphics (pages 9 – 13) illustrated the vegetation cover 'deleted' from the 'DOC-give' / OBDA; or the OBDA area was somehow 'picked out' better (e.g. outlined / hatched). This would highlight the relative location / visibility of the various land parcels better. The overlapping arrowed extents are difficult to follow in places.
27. The photographic viewpoint locations are missing from Figure 4 which includes the ZTV analysis for the OBDA land parcel.
28. ZTV analysis is mostly relevant when a physical change to (any) landscape setting and an assessment of those effects is critical. In other words, a mapped ZTV viewshed indicates the extent of those potentially affected following a landscape change. In the case of this application which is limited to a legal land exchange process and outcome, the outward appearance of the five land parcels will not alter, and further, the outward appearance of all five land parcels which are presently fully vegetated is very similar.
29. I don't believe the area's role as the scenic backdrop (visual attribute) to the Hutt Valley will be 'maintained' (BML Landscape Report, Section 8.0, second bullet point) following the substantive and future changes to the area - if the land exchange is approved. While to a degree 'visually contained', the OBDA land

parcel still forms a part of the visible scenic backdrop. The other visible 'DOC-get' land parcels will change little visually if at all. Therefore, if the land exchange is approved, one area will change while four will not. Overall, there will be a net loss in landscape quality in the future.

30. Notwithstanding the above, though the BML Landscape Report does not address actual change (which is the correct approach), there is no 'general' discussion on the implications of the 'edge effect' or 'fragmentation' regarding the five land parcels. Put simply, edge effects occur where different habitats meet - in this case where increased levels of sunlight and temperature, greater exposure to damaging winds and reduced levels of humidity will likely occur. Risk of fire is also increased as the length of edge increases. Edges can create a non-natural 'transition zone' of sorts which may adversely affect plant growth and the composition of and levels of biodiversity which may have to relocate to more internal locations in the adjacent vegetation cover.
31. The OBDA land parcel includes a 'hollowing out' of an area of largely intact native vegetation albeit in its early stages of succession creating an approximately 1,550 m long 'front' which would be vulnerable to weed invasion, requiring ongoing management. Currently the edge of the 'Give' land parcel with the quarry is approximately 360 m long or some 75% shorter in length.
32. The Dry Creek 'Get' land parcel partly includes rehabilitated quarry land and an approximately 1,050 m long edge adjacent to the existing former quarry site which appears to have a considerable weed infestation problem, requiring urgent management now.
33. The southern 'panhandle' of the Northern Gully and the Southern Gully 'Get' land parcels form a relatively narrow 100 m – 150 m wide 'peninsula' largely comprising 'edge' as opposed to 'patch' extending into a developing rural-residential area. This developed area may be the source of an ongoing spread of animal and plant pests.
34. The existing 'edges' to Belmont Regional Park adjacent to and forming part of the 'Get' land parcels are approximately 2,400 m long, combined. The total lengths of the additional edges of the 'Get' land parcels is approximately 4,350 m. In addition

to this, the 'Give' land parcel currently has an approximately 360 m long edge with the quarry. As proposed, the length of edge for the 'Give' land parcel will increase to approximately 1,550 m. This represents a net increase of approximately 3,140 m of edge that may be susceptible to various risks that DOC will need to manage.

35. Fencing and its ongoing maintenance has not been addressed but will need to be considered by the future landowner/s.

Natural Landscape Character (natural elements, patterns and processes)

36. Ecological values / levels of biodiversity are touched on briefly but should form a more transparent contribution towards a description of the various land parcels' levels of natural landscape character.
37. A description of water bodies, the extent and health of wetlands, length of streams / catchments, hydrological patterns and the natural qualities of these features is touched on briefly. More information on the contribution these features make to each land parcel would enable a deeper understanding of the levels of natural landscape character.
38. An approximate area / proportion of native vegetation cover versus exotic vegetation and weeds versus open pasture quantified for each land parcel would assist with better understanding the levels of natural landscape character in each land parcel. As would any information on animal pests, their habitats and movement.
39. There is no visual sensitivity finding for the OBDA land parcel. However, the term 'visual sensitivity' implies landscape change which this Application does not include.
40. The BML Landscape Report does not summarise all the various findings together in one place which would make a comparison between each land parcel clearer. As such I have assembled the **Table 1** (page 12) using the various findings from the BML Landscape report. Of note, the BML Landscape Report records both a 'Low-moderate' [6.5.5] and 'Low' [7.3] visibility finding for the Southern Gully. When assessing Table 1, the overall landscape value is highest at the Firth Block, and

slightly lesser at the Northern Gully Block. The other three blocks are essentially similar. From my own observations, I would suggest that the overall landscape value of the Dry Creek land parcel should be lower than the other land parcels at 'Low-moderate' (**Table 2** page 13).

Summary of landscape values for each land parcel

41. At Section 6.0, the BML Landscape Report steps through a description of the various attributes of each land parcel and concludes with an overall evaluation. As mentioned above, I do not dispute any of the *descriptive* text in this part of the BML Landscape Report and further, the descriptions accord with my own observations made during the site visit. This section of my statement utilises further information provided by DOC's experts that in my opinion enable a fuller understanding of the natural landscape character values of each land parcel that may be of benefit to the Panel.

OBDA / 'DOC Give' land parcel

- Source water for downstream wetlands and several streams that eventually flow into the Hutt River (tributaries).
- The wetlands (0.23 ha) and waterways that are present have not been modified in recent times and have well-vegetated riparian margins in a 'natural' state.
- Regenerating wetland forest, including 'good quality' wetlands within the area as well as directly to the northeast of the land parcel.
- Vegetation includes some Nationally Threatened plant species.
- Ridges between the arms of the headwaters include large 'old man' pine, macrocarpa and regenerating kamahi or manuka type forest.
- Edges are sound without obvious areas for weed species invasion.
- The flat area in the central / north part of the land parcel once included farm buildings, where the area is now mostly in large macrocarpa with some open exotic grassed areas.

- No planting or major earthworks are present, other than an old pylon access track / farm road.
- Approximately 340 m long edge with the quarry.

Northern Gully / 'Get' land parcel (partly includes QEII covenant)

- There is an area directly adjacent to the Belmont Regional Park which includes 'good quality' kamahi / pukatea along the margins of several tributaries.
- The land parcel includes landform modifications including the dumping of material. In addition, approximately one third of the area includes a channelised watercourse / modified stream.
- There is a small area of natural regeneration along the central western edge of the 'Cottle Block' adjacent to neighbouring private property.
- Part of the topography has been re-shaped and re planted due to quarrying activity.

Southern Gully / 'Get' land parcel

- This area was historically cleared for pastoral grazing and is now clothed in regenerating native (largely mahoe) and exotic vegetation cover including blackberry and gorse which has overgrown the area in places.

Firth Block 'Get' land parcel (overlain with QEII covenant)

- Some wetlands present.

Dry Creek 'Get' land parcel

- This area includes an ex-quarry site that is very weedy but includes some natural regeneration of native plant species through the weed cover.
- The central area (outside the Application) is essentially fully clothed in weed cover which may spread into the 'get' part of the land parcel.

- Given the additional information and site images provided by DOC's experts, some landscape values differ slightly from the Applicant's, set out in **Table 2** page 15.

	Physical attributes	Perceptual attributes	Associative attributes	Visibility	Visual Sensitivity	Overall Landscape Value
OBDA	Moderate	Moderate	Moderate	Low-moderate	No finding	Moderate
Northern Gully	Moderate-high	Moderate	Moderate-high	Low	Low to High	Moderate-high
Firth Block	Moderate-high	High	Moderate-high	High	Low to High	Moderate-high
Dry Creek	Moderate	Moderate	Low-moderate	Low-moderate	Low to Low-moderate	Moderate
Southern Gully	Moderate	Moderate	Low-moderate	Low-moderate / Low	Low to Low-moderate	Moderate

Table 1 – Summary of findings from the BML Landscape Report

Landscape values for each land parcel following improvements made by Applicant

42. In the Land Exchange Report at [10.8] – [10.14] and in Section 13, several improvements to the DOC-Get land parcels are outlined. These improvements proffered by the Applicant include weed and animal pest eradication and control and the relocation and/or replanting of native species. The following discusses the likely change to the existing landscape values at each land parcel on the seven-point scale if the improvements are successful. A comparison / summary is provided in **Table 2**.

Northern Gully / 'Get' land parcel

- A 'Moderate-high' to 'High' overall landscape value. This improves on the 'Moderate-high' value with no improvements in place. The increase is based on the combination of animal pest control and weed eradication enabling improvements to the forest understorey and the substantial removal of exotic canopy species which would otherwise continue to self-seed into the native forest cover. Of note, while the target species include goat and

possum, Old man's beard, Tradescantia, and 'potential' canopy trees, there will be other plant and smaller animal pests (e.g. mustelids) likely to be present or at least able to invade. Blackberry and Pampas grass is noted by the Applicant as occurring in the adjacent Southern Gully block, and also in the adjacent Belmont Regional Park.

Southern Gully / 'Get' land parcel

- A 'Moderate' overall landscape value – no change to the previous overall landscape value rating. While the Applicant proffers the establishment of 200 Swamp maire, there is no measurable outcome or objective regarding weed and animal pest eradication and control.

Firth Block 'Get' land parcel (overlain with QEII covenant)

- A 'Moderate-high' to 'High' overall landscape value – no change to the previous overall landscape value rating. Measurables include 90% establishment within the quarry edge. While this will be an improvement, it is not enough to increase the value higher. It is unclear whether weed and animal pest eradication and control is a measurable objective or outcome in this area.

Dry Creek 'Get' land parcel

- A 'Moderate' overall landscape value. This improves on the previous 'Low-moderate' overall landscape value rating. The increase is based on 90% weed eradication, canopy closure, natural regeneration and the beginnings of natural ecological processes over the entire land parcel and 90% plant establishment within the 'supplementary planting area' shown on the Boffa Miskell Landscape Appendix B6a. Of note no animal pest control is proffered in this land parcel which will have some level of negative effect on any new or regenerating vegetation particularly.

43. The above findings align with the fact that the Applicant does not proffer the same level of weed and animal pest control in all DOC-Get land parcels. Given that many weed species and animal pests will likely be present in all the land parcels, or able to invade all the land parcels from adjacent areas, this introduces a

weakness in the Applicant's measurable objectives and outcomes. In my opinion the eradication and ongoing control of animal and plant pests is more important than replanting or transplanting plant species. Further, it would provide a greater level of certainty if the Applicant also proffered robust conditions regarding planting methodology, protection and replacement.

	Physical attributes	Perceptual attributes	Associative attributes	Visibility	Overall Landscape Value	Where change in findings with BML report (Table 1)	Overall Landscape Value where the proffered improvements are successful*
OBDA	Moderate	Moderate	Moderate	Low-moderate	Moderate	No change	N/A or Moderate 'plus'***
Northern Gully (excludes the QEII part)	Moderate-high	Moderate	Moderate-high	Low	Moderate-high	No change	Moderate-high to High
Northern Gully (QEII part only)	Moderate-high	Moderate	Moderate-high to High	Low	Moderate-high	Change to Associative attributes. Note no change to overall landscape value	Moderate-high to High
Firth Block (QEII)	Moderate-high	High	Moderate-high to High	High	Moderate-high to High	Change to associative attributes and overall landscape value	Moderate-high to High
Dry Creek	Low-moderate	Low-moderate	Low-moderate	Low-moderate	Low-moderate	Change to physical and perceptual attributes and overall landscape value	Moderate
Southern Gully	Moderate	Moderate	Low-moderate	Low-moderate / Low	Moderate	No change	Moderate

Table 2 – Summary of findings / opinion from the preceding Statement by J. Head. Also note I have omitted a 'visual sensitivity' column, as 'visual **sensitivity**' implies landscape change.

* Finding based on the '**Measurable objective or outcome**' for entirety of each block (7 December 2025 Land Exchange Report – [10.8], page 79).

** N/A – any natural landscape value will be largely extinguished over time through quarrying activity. In the event the land parcel exchange did not occur, it is assumed that through ongoing weed and animal pest control, the landscape values of the land parcel would gradually improve. To what extent is uncertain and is time-dependant. As such an assumption is made that there will be an improvement, as opposed to a neutral effect or degradation over time in this scenario.

Overall assessment

44. Rating of the OBDA / DOC 'Give' site: **Moderate (now)** and **Moderate 'plus'** over time through ongoing and successful animal and weed control if the land parcel exchange did not occur.

45. Rating of each of the DOC 'Get' sites:

- Northern Gully / DOC 'Get' site (includes QEII area): **Moderate-high**
- Northern Gully / DOC 'Get' site (excludes QEII area): **Moderate-high**
- Firth Block / DOC 'Get' site: **Moderate-high to High**
- Dry Creek / DOC 'Get' site: **Low-moderate**
- Southern Gully / DOC 'Get' site: **Moderate**

46. Overall rating of the DOC 'Get' sites:

- i. Overall rating of the DOC 'Get' sites not accounting for the QEII area within the Northern Gully block – **'Moderate' - 'Moderate-high'**.
- ii. Overall rating of the DOC 'Get' sites accounting for the QEII area within the Northern Gully block – **'Moderate' - 'Moderate-high'**.
- iii. Overall rating of the DOC 'Get' sites with the Applicant's proffered improvements accounted for - **'Moderate-high'**.



Jeremy Everett Head

Registered NZILA Landscape Architect

26 May 2026