

Monday 15 June 2026

Attention: Amy Robinson, Fast-Track Team

Department of Conservation

Belmont Quarry Fast-track Application – DOC Land Exchange Report

Tēnā koe,

Thank you for consulting Te Rūnanga o Toa Rangatira (Te Rūnanga) on the land exchange report for the Belmont Quarry Development project under the Fast-Track Approvals Act 2024 (the Act).

Te Rūnanga is the mandated iwi authority for Ngāti Toa Rangatira (Ngāti Toa). Te Rūnanga holds responsibilities for protecting and enhancing the mana of Ngāti Toa across political, economic, social, and environmental spheres.

In relation to Te Ao Tūroa, the objective of Ngāti Toa is to nurture a resilient environment that sustains future generations through strengthened connections and mātauranga relating to natural resources. This includes enabling kaitiakitanga, supporting environmental sustainability, and safeguarding culturally significant landscapes and waterways.

Engagement on the land exchange application

Te Rūnanga has been engaged with Winstone Aggregates (the applicant) throughout the pre-lodgement phase of the Belmont Quarry Development project. This includes discussions relating to the proposed land exchange, where we submitted a letter as part of the application by Winstone Aggregates (Appendix 1).

This engagement has centred on the review of ecological, hydrological and cultural information and on understanding the conservation values of both the land proposed to be relinquished (DOC-Give) and the land proposed to be acquired (DOC-Get).

In providing these comments, Te Rūnanga reiterates that our assessment is guided by our kaitiaki responsibilities to Te Ao Tūroa and our obligation to uphold the mauri of the wider Belmont landscape. Our interest extends beyond the transactional exchange of land parcels to the long-term ecological integrity, hydrological functioning and intergenerational wellbeing of the catchment.

Observations on the draft Belmont Quarry land exchange report



We note that the applicant and DOC appear to have assessed the proposal using different methodologies and have reached materially different outcomes. This divergence underscores a broader uncertainty about whether the proposed mitigation and ecological offsetting can adequately address the loss of existing and functioning cultural, ecological and hydrological values.

From the perspective of Te Rūnanga o Toa Rangatira, the overriding priority is ensuring that the mauri of te taiao is restored and upheld where possible. This requires a high level of confidence that any proposed approach will maintain or enhance ecological integrity, rather than relying on uncertain future gains to offset immediate and established loss. The extent of the difference between the applicant and DOC must be addressed ahead of the substantive application being considered.

Approach to identifying impacts on cultural values

We note that the assessment of cultural and heritage values within the report has largely relied on archaeological methodology, undertaken by s9(2)(a) (Archaeologist).

Te Rūnanga would like to emphasise that cultural values are held, defined and expressed by mana whenua. They cannot be adequately captured through archaeological assessment alone. Cultural values encompass living relationships, whakapapa, mātauranga, and ongoing practices of kaitiakitanga that extend beyond the presence or absence of recorded archaeological sites.

Accordingly, it is not appropriate for an archaeologist to determine or assign an overall cultural values rating. This approach risks conflating the absence of recorded archaeological features with an absence of cultural value, which is not an accurate reflection of the lived and enduring relationship of mana whenua with the landscape. We also support the views expressed by Taranaki Whānui on this matter.

We are therefore concerned by the report's conclusion that cultural values across the sites are 'low'. This appears inconsistent with the acknowledgement that the sites form part of a wider cultural landscape, with established whakapapa connections, historical travel routes, and ongoing relationships of kaitiakitanga.

Attribution of Te Rūnanga o Toa Rangatira's feedback

Te Rūnanga notes an inconsistency in Appendix 2 (Summary of comments received on the application and responses), particularly on page 57 and page 76, where responses to Te Rūnanga o Toa Rangatira are incorrectly attributed to Taranaki Whānui.

All responses must be amended, where appropriate and relevant, to accurately reflect Te Rūnanga o Toa Rangatira, to ensure mana whenua are properly represented and understood.



Care in assessing long-term, uncertain ecological offsetting

We generally note the report's cautious approach and acknowledge that it is not clearly demonstrated that the land exchange will result in an overall enhancement of conservation values. In particular, we observe the reliance on uncertain future restoration outcomes, the loss of established wetland and ecological systems, and the importance of recognising existing ecosystem values. We also recognise the need to carefully account for existing protections, such as QEII covenants, to avoid overstating conservation gains, along with consideration of the potential for additional and ongoing long term management responsibilities for DOC.

Furthermore, we acknowledge the long-term nature of the proposed offset and the need for sustained, successful pest and animal control for the applicant to achieve the proposed offset value. With this in mind, we emphasise the importance of ensuring that these requirements are clearly understood and adequately addressed.

Conclusion

Te Rūnanga o Toa Rangatira seeks that its comments are fully considered and appropriately incorporated into the final report.

In particular, we emphasise that:

- Cultural values must be defined and assessed by mana whenua, not inferred through archaeological methods alone;
- Caution is taken where current, established values are proposed to be exchanged for uncertain future gains

Ultimately, our priority is to ensure that our mokopuna and future generations inherit a thriving and resilient taiao, and that our relationship with the whenua, wai and wider landscape is upheld in a way that reflects our responsibilities as kaitiaki.

Nāku noa, nā

s9(2)(a)

s9(2)(a)



Appendix 1

25 February 2025

Attn: Emma Fahey

Belmont Quarry Fast -Track Application – Land Exchange

Tēnā koe Emma,

Thank you for consulting Te Rūnanga o Toa Rangatira (Te Rūnanga) on the land exchange application lodged by Winstone Aggregates with the Department of Conservation for the Belmont Quarry Development project under the Fast-Track Approvals Act 2024 (the Act).

Te Rūnanga is the mandated iwi authority for Ngāti Toa Rangatira (Ngāti Toa). We have the responsibility for protecting and enhancing the mana of Ngāti Toa across the various political, economic, social and environmental spheres.

In relation to Te Ao Tūroa, the objective of Ngāti Toa is to nurture a resilient environment to sustain future generations through reclaimed connection and mātauranga to natural resources, empowering kaitiaki who are leaders and co-managers of our natural environment, our commitment to environmental sustainability and our ability to adapt to the impacts of climate change.

Details about the Application and the view of Te Rūnanga

Te Rūnanga has been engaged with Winstone Aggregates throughout the pre-lodgement phase of the Belmont Quarry Development project, in relation to the proposed land exchange (Part A). We provided written feedback prior to lodgement and subsequently supplied an updated letter in November 2025 addressing refinements to the application.

Our engagement reflects our interests in review of ecological, hydrological and cultural information, as well as discussions regarding the conservation values of both the land proposed to be relinquished and the land proposed to be acquired.

In providing these comments to DOC, Te Rūnanga reiterates that our assessment is guided by our kaitiaki responsibilities to Te Ao Tūroa and our obligation to uphold the mauri of the wider Belmont landscape. Our interest extends beyond the transactional exchange of land parcels to the long term ecological integrity, hydrological function, and intergenerational wellbeing of the catchment.

The Position of Te Rūnanga

Te Rūnanga maintains a neutral position on the proposed land exchange. However, we wish to raise the following matters:



TE RŪNANGA O TOA RANGATIRA

- Overall conservation benefit: DOC must be satisfied that the exchange results in a genuine conservation gain, with clear evidence that the values of the land received exceed, or appropriately offset, those of the land being relinquished.
- Independent ecological assurance: Te Rūnanga recommends that DOC obtain or confirm independent peer review of the ecological assessments to ensure robustness and transparency. We also encourage DOC to evaluate the ecological function of the habitats involved, including hydrological characteristics, species composition and regeneration potential.
- Loss and vulnerability of swamp forest: Given the substantial historical loss of wetland and swamp forest habitat in the Wellington Region, Te Rūnanga recommends that DOC's assessment explicitly considers the regional scarcity of such ecosystems. This is particularly important in light of the vulnerability of swamp maire to myrtle rust and the need to support the long term viability of these taonga species.
- Protection of water bodies and associated species: The tributaries, wetlands and taonga species within the Belmont catchment require careful consideration. Sediment control, water flow management and monitoring frameworks must be sufficiently robust to avoid degradation of our ancestral landscape.

Conclusion

Te Rūnanga acknowledges that the proposed land exchange does not alter the enduring relationship of mana whenua with the Belmont landscape. Our kaitiaki responsibilities remain irrespective of land tenure.

Te Rūnanga appreciates the opportunity to provide comment on the land exchange component of the Belmont Quarry Development project. Our position reflects a measured approach grounded in kaitiakitanga, ecological integrity and intergenerational responsibility.

We remain committed to constructive engagement with Winstone Aggregates as this proposal progresses under the Fast-track Approvals Act 2024.

Ngā mihi,

s9(2)(a)



TE RŪNANGA O
TOA RANGATIRA

TE AO TŪROA | OHANGA | ORANGA | WHAI MANA | NGĀTI TOA RANGATIRATANGA

