

BELMONT QUARRY LAND EXCHANGE APPLICATION
C.03 CONSULTATION – ISSUES AND RESPONSES

Number	Issues raised during pre-lodgement consultation		How issues raised during consultation have informed the project
	Topic	Description	Response
		Relevant Local Authorities – Section 11(1)(a)	
		Greater Wellington Regional Council	
		Manager of Belmont Regional Park (s 19(3) FTA Act)	DOC will invite comments from GWRC on the exchange in this capacity. Winstone has consulted with GWRC about the exchange taking its feedback on board to modify its proposal and reached agreement with GWRC. GWRC has written to DOC providing its comments on the exchange and indicating its neutral position on the exchange.
	Potential impact of land exchange on recreation values.	Concern that the proposal would remove an existing recreational track and disrupt walking and biking connections within this part of the regional park. Discussion of proposed new walking tracks and connections (discouraged by GWRC did not want new assets, did not consider feasible or desirable from a recreation perspective to have new connections in this area)	OBDA footprint reduced in order to achieve the following: <ul style="list-style-type: none"> • Upper walking track remains intact • Park connectivity remains. GWRC did not support new tracks being developed or offered as part of the exchange, Winstone revised its designs to explore GWRC concerns and decided not to pursue proposal to exchange new tracks.
	Potential effects of land exchange on recreation values.	Concern that the lower loop track, used informally by bikers and required for Transpower access, would be lost or disrupted	New alignment of Transpower utilities track in order to achieve the following: <ul style="list-style-type: none"> • Maintained connectivity and access to Transpower pylons.
	Potential impact of land exchange on natural wetland and swamp maire.	Concern that the footprint included a significant natural wetland and a mature population of threatened swamp maire	OBDA footprint reduced and refined in order to achieve: <ul style="list-style-type: none"> • Part of the swamp maire habitat and natural inland wetland stay within the Regional Park and remain untouched by the proposal.
	Ecological value at Dry Creek	Concern that parts of the Dry Creek site had low ecological value due to historic quarry and clean fill use.	Dry Creek exchange area revised in order to achieve the following: <ul style="list-style-type: none"> • Now includes only land with ecological value, excluding areas identified as unsuitable for public land because of past quarry and cleanfill activities.
	Ecological value of land parcels	Concern that the exchange did not provide sufficient ecological value or fair return for the land sought.	Southern Gully parcel (3.96 ha) added to land exchange in order to achieve the following: <ul style="list-style-type: none"> • Additional land with higher riparian value and includes a natural wetland • Habitat available for swamp maire GWRC was informed and supported the inclusion of further land in the exchange.
	Environmental effects from end use as OBDA	Hydrological effects from fill placement. Impacts on wetlands	Winstone will continue to engage with GWRC as a party with an interest in the exchange while preparing the Substantive Application. A copy of the proposed land exchange draft technical reports was provided to GWRC, prior to making an application to the Director-General of Conservation.
	Relationship with GWRC	Use of fast track. Expectations and relationship Political Desire for complete information and technical clarity Winstone as a good neighbour to Dry Creek area of Belmont Park – assistance to GWRC for maintenance of recreation tracks in the area.	Working agreement <ul style="list-style-type: none"> • Need for continued engagement, including briefings and site visits • Importance of a “no surprises” approach. • Winstone Aggregates and GWRC agree to work cooperatively.
		Requiring authority (s 178 RMA 1991)	
	Designation	Its role as the requiring authority for the Notice of Requirement seeking a designation over the entire Belmont Regional Park (including the area that Winstone seeks to exchange with DOC).	Consultation with GWRC, in its capacity as Requiring Authority, resulted in agreement being reached, and a section 178(2) letter being signed by GWRC on 25/11/25.

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			A copy of the proposed land exchange draft technical reports was provided to GWRC, prior to making an application to the Director-General of Conservation. See Appendix D1.
		Occupier of land adjacent to the project site	
	Adjacent land	Manages the remainder of Belmont Regional Park outside of the DOC-Give areas (subject to Toitū Te Whenua Parks Network Plan 2020-2030).	GWRC Parks has signed a section 178 letter from the requiring authority, dated 25/11/25. A copy of the proposed land exchange draft technical reports was provided to GWRC, prior to making an application to the Director-General of Conservation.
		Consent authority	
	Use of fast-track	GWRC also has a regulatory function in respect of the consents as the local authority. Winstone anticipates being able to work cooperatively with Andrew's Banks Fast Track team (in the usual way). Preliminary discussions have been held on the approach to consultation for the substantive application.	Winstone will prepare and file an application for resource consent under section 42 of the FTAA 2024. Winstone will work with GWRC in preparing that application. A copy of the proposed land exchange draft technical reports was provided to GWRC, prior to making an application to the Director-General of Conservation. See Appendix D1.
		Hutt City Council	
		Consent authority	
	Pre-application for resource consent	Winstone met with Hutt City Council to discuss the land exchange, including with the planning team, roading team and legal team. Hutt City Council understands that Winstone Aggregates intends to lodge an application for approval of a land exchange under the Fast-track Approvals Act 2024, and that the subject site will be one of the parcels proposed for inclusion in the land exchange (The DOC-Give land is to be used as an OBDA). Hutt City Council raised no concerns in its capacity as the consent authority. Winstone provided HCC with draft technical reports on the exchange. No feedback was provided.	Winstone will engage with HCC as a consent authority under the RMA 1991, while preparing to lodge Substantive Application. A copy of the proposed land exchange draft technical reports was provided to HCC, prior to making an application to the Director-General of Conservation. See Appendix D2.
		Adjacent landowner	
	Hutt City as a landowner	Hutt City Council does not own any allotments in the area of the exchange.	No further action needed. See Appendix D2.
		Holder of an interest	
	Existing encumbrance – vegetation protection (instrument 9032630.1)	Confirmation there is an encumbrance (the Encumbrance) in favour of Hutt City Council on the land with legal description Part Lot 1 DP 22561 and record of title WN31D/969 (the Land). The Encumbrance is for the protection of vegetation on part of the Land and is contained in instrument 9032630.1. Hutt City Council provided a letter (dated 2 December 2025) confirming that: <ul style="list-style-type: none"> Hutt City Council agrees that its legal interest in the land under encumbrance is unaffected by the proposed land exchange; and To the extent required, Hutt City Council as holder of a legal interest in the land under the encumbrance gives agreement to the land exchange proposed by Winstone Aggregates (pursuant to schedule 6, clause 31(1)(b) of the Fast-track Approvals Act 2024). This was updated on 2 December 2025 noting that there was agreement in principle to remove this encumbrance following advice that it may not be able to remain on land under the Reserves Act. It was suggested that Winstone prepare the necessary paperwork to discharge the encumbrance.	Winstone will engage with HCC as the holder of the encumbrance, while preparing to lodge Substantive Application. Winstone will provide the HCC letter to the Director General as part of its request for a land exchange recommendation Following advice that the encumbrance may not be able to remain on the title when exchanged Winstone and Hutt City Council have agreed to pursue discharge of the encumbrance issuing an updated letter. Winstone has provided the required paperwork to HCC for consideration of the discharge. See Appendix D2.
		Relevant Iwi Authorities, Hapū and Treaty Settlement Entities - Section 11(1)(b)	

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		Winstone undertook detailed pre-lodgement consultation with DOC Fast Track Exchange team prior to Lodgement over a period of 8 months. This included site visits, workshops, provision of draft technical reports and feedback from DOC legal and SLM team, and experts as well as several expert conferences on ecology. The exchange proposal was developed over this time in response to feedback from DOC and other parties.	
		Botanical	
		Would it be possible to provide a list of species that are used for the planting of the Cottle Block area that is to be offered and: a. Were the plants came from, and b. Who did the planting.	A copy of the Quarry Management Plan is available on the MfE website Belmont Quarry Development Ministry for the Environment .
		General BlueGreen report feedback We do not agree with the method of vegetation partitioning that has been done in the BlueGreen report; it suggests the areas are low in diversity, and therefore low in value. We would like to adjust these substantially. Therefore, we have provided an alternative assessment in Appendix 1.	The Blue Green Ecology report has been revised to include the Southern Gully Block (3.96 ha), to increase the representation of wetland and slope habitat types into the DOC-Get land package. The Southern Gully provides habitat available for swamp maire generation.
		Biodiversity Values - Northern Gully – pages 29-31 of BlueGreen report <ul style="list-style-type: none"> • Representativeness: moderate • Rarity and distinctiveness • Diversity & pattern: moderate-low • Ecological context Values conclusion: moderate biodiversity value	The Blue Green Ecology report has been revised in response to this feedback at section 6.1. A copy of Blue Green Ecology report is provided at Appendix B1 of the land exchange application lodged with the Director-General of Conservation. A copy of this report was shared with DOC-staff prior to making an application to the Director-General of Conservation.
		Biodiversity Values - Firth Block – pages 40-41 of BlueGreen report <ul style="list-style-type: none"> • Representativeness: moderate-low • Rarity and distinctiveness: low • Diversity & pattern: low • Ecological context: low-moderate Values conclusion: moderate-low biodiversity value	The Blue Green Ecology report has been revised in response to this feedback at section 6.4. A copy of Blue Green Ecology report is provided at Appendix B1 of the land exchange application lodged with the Director-General of Conservation. A copy of this report was shared with DOC-staff prior to making an application to the Director-General of Conservation.
		Biodiversity Values - Dry Creek – pages 35-37 of BlueGreen report <ul style="list-style-type: none"> • Representativeness: low • Rarity and distinctiveness: low • Diversity & pattern: low • Ecological context: low Value conclusion: low biodiversity value	The Blue Green Ecology report has been revised in response to this feedback at section 6.3. A copy of Blue Green Ecology report is provided at Appendix B1 of the land exchange application lodged with the Director-General of Conservation. A copy of this report was shared with DOC-staff prior to making an application to the Director-General of Conservation.
		OBDA	
		In the BlueGreen report, page 20, figure 5, a very insightful sequence of pictures has been included to show the land use through time. In the first (oldest) picture 1941, there is still land which is not pasture. These tongues of dark coloured something are likely wetlands in a style of low-sloping shallow gullies. This is where our botanist has found swamp maire and ramarama. The section on the lower left inside the OBDA is now mature forest and includes rewarewa, pukatea, horoeka, and even a couple of hinau. We have detailed locations of the rare plants below.	The Blue Green Ecology report has been revised to include the Southern Gully Block (3.96 ha), to increase the representation of wetland and slope habitat types into the DOC-Get land package. The Southern Gully provides habitat available for swamp maire generation.
		Three visits have been made to the Belmont Regional Park (BRP) by our botanist. He has found more than 100 native species in the area in addition to Avifauna recordings.	No action required. A list of species found in the DOC-Give and DOC-Get areas is presented as Appendices 2, 3, 4, 5, and 6 of 02/12/25).
		In addition to botanical recording, some Avifauna was seen or heard - shelduck, falcon(s), ruru, tomtit, whitehead, piwaiwaka, kereru, blackjack gull, belbird, tui, grey warblers, waxeyes, mallards, blackbirds, Eastern rosella. More visits at various time of the year would be required to get a fair idea of the potential species that frequent the area. This is by no means a comprehensive record.	No action required. A comparative assessment of bird species present is presented as Section 7.1 and Appendix 6 of Blue Green Ecology (02/12/25).
		A number of threatened plant species have been noted in the OBDA seen on the screen shot to the right:	The Blue Green Ecology report (02/12/25) has been revised at 6.5 and Appendix 6 in response to this feedback and is provided at Appendix B1.

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		Numerous specimens of swamp maire, (Threatened – Nationally Vulnerable) have been recorded within the OBDA. 7 locations - 9 mature specimens, including 2 of the locations having seedlings also suggesting healthy plants that are good viable seed sources.	The Blue Green Ecology report (02/12/25) has been revised at 6.5 and Appendix 1 in response to this feedback and is provided at Appendix B1.
		Numerous specimens of ramarama (Threatened – Nationally Critical) have been recorded, but they may not be as valuable as the swamp maire. 11 locations (mostly near each other) 23 specimens from sapling age to mature, representing all stages of growth.	The Blue Green Ecology report (02/12/25) has been revised at 6.5 and Appendix 1 in response to this feedback and is provided at Appendix B1.
		1 mature plant of Coprosma rubra (At Risk - Declining) is also present.	The Blue Green Ecology report (02/12/25) has been revised at 6.5 and Appendix 1 in response to this feedback and is provided at Appendix B1.
		One wetland has Carex maorica (Regionally Uncommon, Obligate Wetland species) present.	The Blue Green Ecology report (02/12/25) has been revised at 6.5 and Appendix 1 in response to this feedback and is provided at Appendix B1.
		Another wetland also has a healthy population/colony of Isolepis habra (Regionally – Uncommon) present.	The Blue Green Ecology report (02/12/25) has been revised at 6.5 and Appendix 1 in response to this feedback and is provided at Appendix B1.
		The swampy areas that the swamp maire (Obligate Wetland species) are in have been thoroughly mapped back to where they start, so that a good record of the entire system which feeds the swampy areas is accurate. We note that the map above is in draft state but could reflect a clearer picture of the current swamp maire numbers than the BlueGreen report.	The Blue Green Ecology report (02/12/25) has been revised at 9.3.
		The values that these areas have and the species that are in them suggest that the area is of high biodiversity value due mostly to its rare wetland complex nature. When looking at the area on a Topomap; the geology being so flat for such a large area is very unusual. This is the only population of swamp maire in the BRP. Therefore, we do not agree with the BlueGreen assessment of the area being low biodiversity value.	The Blue Green Ecology report (02/12/25) has been revised at 9.1 to include the Southern Gully Block (3.96 ha), to increase the representation of wetland and slope habitat types into the DOC-Get land package. The Southern Gully provides habitat available for swamp maire generation.
		The edges of the vegetation throughout the OBDA are intact and prevent weedy species invasion. The pines and macrocarpa are a bit of a liability as where they have fallen over or dropped large limbs. Some invasives have taken hold (for example, Holly). Some noxious old man's beard is present.	Improvements Package. The proposal includes an ecological improvements package which includes weed control in DOC-Get areas. The pines and macrocarpa will be removed from the community as part of Substantive Application.
		Ecology	
	Ecological values	Concern about a solely qualitative approach to assessment of ecological values, as opposed to a mixed quantitative qualitative approach.	The Blue Green Ecology report has been revised in response to this feedback at section 9.1.
		Herpetofauna	
	Need for lizard surveys.	No attempt was made to survey for lizards at the appropriate time of year (October to April inclusive) on the DOC Recreation Reserve area. A 1-day site visit in July (mid-winter) is insufficient to determine the species and potential density of lizards present. It does not appear that all 4 blocks were visited.	Additional lizard surveys were completed. A copy of the lizard assessment by Blueprint Ecology is provided at Appendix B2.
	Need for lizard surveys.	An in-depth survey during October to April period is required at all four blocks so a fair comparison can be made of the number of species likely to be present, as well as potential density of each species in different habitats.	Additional lizard surveys were completed. A copy of the lizard assessment by Blueprint Ecology is provided at Appendix B2. Blueprint Ecology Ltd report (Appendix B) provides a presence analysis by using ground cover traps and spotlighting to determine species presence/absence as well as distribution based on habitat type.
	Need for lizard surveys.	It is considered (p.28) that within the northern gully block 4 species of lizards are highly likely to be present, while 2 others are possibly present. As there has been no survey, an estimate of the number of individuals of each species, or relative density of each of these species in this block is unknown.	The Blueprint Ecology Ltd report (Appendix B2) provides a map of likely habitat quality, which includes high quality habitat in the Northern Gully.
	Need for lizard surveys.	The Dry Creek block is considered highly likely to contain 2 species of lizard (<i>Oligosoma polychroma</i> and <i>Mokopirirakau</i> "southern North Island"), and possibly another 2 species (<i>O. ornatum</i> and <i>O. zelandicum</i>).	Four northern grass skink (<i>Oligosoma polychroma</i>) and three ngahere gecko (<i>Mokopirirakau</i> "Southern North Island") were recorded at BRP. Lizard capture results are provided in Blueprint Ecology Ltd (Appendix B2).

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	Need for lizard surveys.	The Firth QEII block is the only site that has had previous survey, and it is confirmed that <i>Oligosoma polychroma</i> and Mokopirirakau “southern North Island” are present. Another 2 skinks (<i>O. aenum</i> and <i>O. ornatum</i>) are possibly present, but again there needs to be further sustained survey in likely habitat and sufficient effort to determine whether these species are in fact present, and an assessment provided of their likely numbers or relative density.	Blueprint Ecology (Appendix B2) provides a map of likely habitat quality, which includes a moderate-sized pocket of high-quality habitat in the Firth Block, with the balance of firth block in moderate quality.
	Need for lizard surveys.	A recent reporting of barking geckos (<i>Naultinus punctatus</i>) within the Belmont area has come to our attention. This species is not mentioned in the ecological report.	It is possible that higher proportions of barking gecko or ngahere gecko could occur within the high quality habitats “hot spots”. The presence and abundance of these species in these locations have been assumed in our habitat quality assessment.
	Need for lizard surveys.	Appendix 5 (Herpetologist report) is not provided.	Blueprint Ecology (Appendix B2) provides this information.
	Need for lizard surveys.	Without this detail of the species found in each block, as well as likely numbers/density, a fair comparison with high confidence of each block for its herpetofauna values cannot be made.	Blueprint Ecology (Appendix B2) provides this information.
		Avifauna	
	Avifauna	Bird calls were recorded at 4 locations in the DOC Recreation Reserve. This method is appropriate, but different habitats should be sure to be included. This is shown in Fig 2, but the text in the figure is partly illegible, and parts of the description seem to be missing.	BlueGreen Ecology report (Appendix B1) presents analysis at section 7.1, and raw data at Appendix 6.
		However, all 4 blocks were not included in these surveys, and surveys are needed during all 4 seasons at each block to provide a fair comparison between all blocks. Also, the hours during which the recorders were operating are not provided.	BlueGreen Ecology report (Appendix B1) presents analysis at section 7.1, and raw data at Appendix 6.
		There is no analysis of the bird recordings taken in winter 2025 in the DOC Reserve – analysis of this data should be provided.	Survey data is presented in BlueGreen Ecology (Appendix B1) at Appendix 6.
		Sites also need to have other assessments by avifauna experts on-site, as species such as shags that may use some waterway features are difficult to detect using bird recorders alone.	Survey data is presented in BlueGreen Ecology (Appendix B1) at Table 19.
		Fig. 7 shows the bird species detected by various data sources, but these are not adequately explained in the table or referred to easily to a section within the text. There is also no indication of the number (or relative density/conspicuousness) of each species present, and it is not provided per block.	Survey data is presented in BlueGreen Ecology (Appendix B1) at Appendix 6.
		It appears there has been no in-depth survey for avifauna values at Dry Creek.	BlueGreen Ecology report (Appendix B1) presents analysis at section 7.1.
		At Firth QEII, the authors speculate (p.39) that this site may hold several species that have not yet been detected at the site. It is important that sufficient surveys are undertaken throughout the year in order to determine if these species are in fact present, and if so, what their relative numbers or density may be.	BlueGreen Ecology report (Appendix B1) presents analysis at section 7.1.
		Bats	
		No bat detection work was attempted. This should be undertaken for at least 4 weeks during October-March at all 4 blocks.	A bat study has been commissioned and reported on, see Boffa Miskell (05/12/2025) for details.
		A recent reporting of the critically endangered lower North Island sub-species of short-tailed bat in the Hutt Valley is within 25km of the site, meaning this site is potentially in range of this population. A season-long survey should therefore be carried out at the site to ensure the area and large trees at the site are not used for Short-tailed bat roosting.	Boffa Miskell (05/12/2025) finds that there is equally likely an absence of bats between the DOC-Give and DOC-Get.
		Terrestrial Biodiversity Values	
		The improvement package socialised on 12 October does not materially improve the above scoring of the land offered in the exchange.	An updated ecological improvements package is provided at Table 20 of the BlueGreen Ecology (2025) taking into account DOC’s identification that swamp maire habitat and species identified above.
		The rarity of species present is the primary factor that results in the Public Conservation Land being assessed as ‘High.’	The Southern Gully, a swamp maire habitat, has been added into the DOC-Get package of the proposed land exchange.

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		We have identified a potential model for an improvement package design which addresses rarity which the applicant may wish to consider, which was used for the Manawatu Gorge Road project. Attached is a condition set from that project that addresses rare species (swamp maire and ramarama) by way of example. Something that addresses the rarity factor may help raise the assessed value of the land offered.	
		With the current information offered (not all bird recordings analysed, no lizard data for most sites and no bat data), the terrestrial biodiversity values do not change from our 24 Sept commentary. We are working on the breakdown of all the components (much like the freshwater approach in Appendix 1). This is difficult to assess until all the survey information has been collated, analysed and reported to us.	No action required. Analysis of bird call data is presented in BlueGreen Ecology at 7.1 and assessment of lizard data is presented in Blueprint Ecology (2025) these reports are appended as B01 and B02 respectively.
		The Concept Plan requires more detail. It suggests at new tracks, which would be an inconvenience to DOC as they don't manage the wider site. There is a need to understand where the costs lie and explore third party management options.	Winstone consulted on adding a new Northern Gully foot track or a new Dry Creek lookout track. Both tracks were removed so as to reduce future cost burden on DOC following consultation feedback from DOC and GWRC Parks that the Northern Gully Track was not seen as desirable.
		Freshwater	
	Freshwater	It would be good to understand the connectivity of the waterbodies better and where there are fish passage barriers (man-made and artificial) in the sites and downstream – could this level of detail be added to the report?	The Blue Green Ecology report (02/12/2025) has been amended to reflect this at 8. See Appendix B01.
		The report refers to a stream survey report, it would be good to have a copy of this. If not, further information on the freshwater fish and macroinvertebrate species present/likely to be present in the waterways (if there are no surveys then predictive models can be used). In particular we would be keen to understand the freshwater values that could be gained. To do this we would need species / habitat types present in the 'give' areas.	The Blue Green Ecology report (02/12/2025) has been amended to reflect this at 8. See Appendix B01. A hydrological assessment by Landscape Dynamics provides an assessment of surface water bodies. This is provided at Appendix B9.
		More information on the wetlands present (natural and otherwise) is needed, as there is conflicting information on their locations in each area. We would expect to see more detailed freshwater survey reports/information in the application to be able to assess the freshwater values.	The Blue Green Ecology report (02/12/2025) has been amended to reflect this at 8. See Appendix B01. A hydrological assessment by Landscape Dynamics provides an assessment of surface water bodies. This is provided at Appendix B9.
		The applicant has provided limited information on the fish and invertebrate species present in the waterways. Only two waterways (one within the take area, one adjacent to the western side of the take area) were surveyed in 2022. It is understandable given the ephemeral/intermittent nature of some of the waterways; however, there are also permanent streams that weren't surveyed and may contain fish and macroinvertebrate species.	The Blue Green Ecology report (02/12/2025) has been amended to reflect this at 8. See Appendix B01.
		There is a lack of information on the wetland types that have been recorded by the applicant.	The Blue Green Ecology report (02/12/2025) has been amended to reflect this at 8. See Appendix B01. For further reading also see Landscape Dynamics hydrology assessment of surface water bodies. This is Appendix B9 to the application.
		Some of the information provided appears to be based on qualitative and assumed statements rather than surveyed information, especially in relation to ephemeral and intermittent stream reaches. Ephemeral and intermittent waterways may have less value as habitat for fish species however they still provide seasonal habitat for fish species, habitat for macroinvertebrates, act as buffers for downstream reaches and can help regulate water flows.	The BlueGreen Ecology report (Appendix B01) has been amended to reflect this at 8. See Appendix B01. For further reading also see Landscape Dynamics hydrology assessment of surface water bodies. This is Appendix B9 to the application.
		Where is the location of the perched culvert shown in Figure 3 (Boffa Miskell, 2022, P. 9)	Boffa Miskell (2022) states that this perched culvert is located in Kaitangata Stream.

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		Where is the location of the culvert on Buchanan Stream shown in the unnamed figure? (Boffa Miskell, 2022, P.12).	Boffa Miskell (2022) states that this perched culvert is located in Buchanans Stream.
		There is a lack of qualitative survey information for the perennial and intermittent waterways on the eastern side of the OBDA area e.g. fish, invertebrates, habitat.	The Blue Green Ecology report (02/12/2025) has been amended to reflect this at 8. See Appendix B01.
		Is there any survey information for the ephemeral waterways in the Firth Block?	This information is in Landscape Dynamics (Appendix B9) at 2.5.
		Is there any fish survey information for the wetland feature located within the OBDA/QEII/Firth Block site?	This point has been superseded through design revisions to exclude the wetland from the OBDA footprint.
		Where has the fine sediment in Buchanan Stream and Kaitangata Stream identified in the Aquatic values report originated from?	Sediment in the Buchanan Stream and Kaitangata Stream will have originated further upstream from the sampling location.
		The applicant has stated the OBDA does not include perennial streams (BlueGreen, 2025, P. 11)[2] but their map (Figure 29) shows there are perennial waterways within the OBDA and setback area, in addition to the ephemeral and intermittent headwater reaches. Clarity on this is needed.	A hydrology report has been provided with the application.
		Fauna	
	Fauna	Fig. 1- it is very difficult to work out which habitats line up with the descriptions in the key provided. For example, there is a dark brown colour on the map with no equivalent in the key. We suggest letters are also used on the habitat types on both the map and key so it is clear which habitat is which.	Blueprint Ecology Ltd (Appendix B02) has been amended to reflect this.
		On p.14-15, it states that a framework for land exchange was circulated to DOC ecologists, where it was approved. This is not the case – we did not approve this approach as we were waiting for our own methodology to be developed and approved. Once this was approved, our methodology was provided to Winstone.	This is addressed in the BlueGreen Ecology report (Appendix B01) at Section 5.
		The quality of the photos is very poor and highly pixelated.	Blue Green Ecology (Appendix B01) has been amended to reflect this.
		Fig. 19 – there are 4 vegetation types shown on the map, but only 3 described in the key. Also, one of the vegetation types is termed “Tawa-kamahi forest proposed overburden” which is problematic as this site is meant to be for land exchange and not meant to be used for the placement of overburden. There are also two green circles drawn on the map where the quarry is (one large, 1 small), but the purpose of these is not explained.	Blue Green Ecology (Appendix B01) has been amended at 6.1 to reflect this.
		The ecological report uses an assessment of the various blocks according to the value of each vegetation type. However, fauna values do not appear to be included in this assessment. There is an assessment of other ecological aspects of the sites in Fig. 17, but there does not appear to be consideration that the OBDA + setback area is one intact square-shaped block, whereas the other 3 blocks are not physically connected and have awkward, long shapes with high perimeter:area ratios. This is important for fauna and ecology generally, as island biogeographic theory states that larger areas can support more diverse range of species. In addition, the connectivity of the OBDA to other larger areas of native habitat does not appear to have been considered in the scoring system. For example, the ‘OBDA+ setback’ scores ‘negligible’ for both ‘Other buffering roles’ and ‘Corridor or movement assistance roles’ yet it is connected to other more extensive areas of vegetation. We also suggest the report should consider scoring fauna values in each of these ecological aspects.	Blue Green Ecology (Appendix B01) has been amended at 9.2 to reflect this.
		Recreation	
	Recreation	We did not receive a recreation report to assess. We would expect to see further information on recreation within the application for land exchange.	A copy of Greenaway & Associates Ltd (2025) was subsequently presented to DOC and is provided at Appendix B4.
		The Concept Plan provides some indication of what is proposed, but it would be good to have more detail. It suggests a potential new connection from the existing Boulder Hill Track (labelled as Puke Ariki Traverse on the map) to the edge of the QE2 covenant in the Northern Gully block. It should be	These aspects were added to the final Concept Plan (Boffa Miskell, 2025). See Appendix B6a Appendices.

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Number	Issues raised during pre-lodgement consultation		How issues raised during consultation have informed the project
	Topic	Description	Response
		noted that this connection effectively already exists as it follows a pylon access route for most of the way. Only a very small section of track in the Northern Gully block appears to be new track.	
		A short length of track is also proposed branching off the Dry Creek Loop Track into the area above the former Dry Creek Quarry. It would be good to understand if these tracks are intended as part of a mitigation package or are just to illustrate possible connections with the new areas of PCL. New tracks in this area would be a bit of an inconvenience to DOC given we don't manage the wider site. We would want to understand where any costs lie and explore third party management options.	Dry Creek foot track was removed so as to reduce future cost burden on DOC and lack of desire for new tracks from GWRC (who manage adjacent Regional Park) and permission for connections.
		It is hard to form a view on the benefit of these tracks to the public with the information we have been provided so far. Understanding the existing use of the Dry Creek block, the opportunity provided by the additional tracks and how they complement the existing network would be important for assessing their value (i.e. through the missing rec assessment).	Dry Creek foot track was removed so as to reduce future cost burden on DOC and lack of desire for new tracks from GWRC (who manage adjacent Regional Park) and permission for connections.
		Note that the realigned section of the Boulder Hill Track reflects an existing marked short cut.	All effects on the Boulder Hill Tramping Track Puke Ariki Traverse have been avoided through subsequent design.
		Historic Heritage	
	Archaeology	The archaeological assessment report of the proposed land exchange for Wellington Belmont Quarry contains a sound and generally complete survey of the areas concerned and beyond.	No further action needed. No further action needed. A copy of the final Archaeological Assessment (Clough & Associates Ltd) is appended to the application made to the DG. A copy was provided to DOC staff prior to making this application.
		The methodology includes checks with the NZAA database, HNZ listings and District Council listed Heritage sites as well as a field trip. Reference to early survey maps and aerial photos were also detailed. These are all the sources we would expect to see examined and interpreted for a report like this.	No further action needed.
		It should be noted that this report doesn't cover cultural values.	Cultural values are reported elsewhere in the application document package.
		We would recommend the inclusion of a Cultural Values report to read in conjunction with this report as intangible values shouldn't be overlooked.	A copy of the Cultural Values Assessment report provided by Taranaki Whānui is provided at Appendix B7.
		Valuation	
	Valuation	The valuation report covers what we would expect in a reasonable manner.	No further action needed. A copy of the final Valuation Report (Colliers WGN Ltd) is appended to the application made to the DG. A copy was provided to DOC staff prior to making this application.
		Landscape	
	Landscape	The Draft Landscape Assessment Report appears to be complete and provides sufficient detail to form a view on the landscape values and the visibility of the affected blocks of land within the wider area. One point to highlight is the inclusion of areas of QE2 covenant and how these are treated in the assessment of net contribution to conservation values. These areas are protected under both the land exchange scenario and the status quo.	No further action needed. A copy of the final LVEA and Concept Plan (Boffa Miskell, 2025) is appended to the application made to the DG. A copy was provided to DOC staff prior to making this application.
		Heritage New Zealand Pouhere Taonga	
		Archaeological assessment. HNZPT met with Winstone twice in May 2025, a copy of the draft archaeological assessment was provided in advance of the second meeting and reviewed by NZHPT NZHPT confirmed it had no no concerns with its methods or findings. An updated draft archaeological assessment was later provided to NZHPT in response to Winstone's decision to include the Southern Gully, NZHPT views were sought and NZHPT confirmed it had no concerns.	Discussed draft archaeology report. No comments from HNZPT confirmed via meeting notes and email correspondence.
		Holders of Interest in the Land to be Exchanged- s 11(1)(f)	
		Queen Elizabeth The Second National Trust (QEII)	
	QEII Covenant	QEII met with Winstone's in July and attended a site visit on 5 September 2025 and provided a memo dated 25/9/25. In advance of the site visit they were provided a draft copy of the ecological report. QEII maintains a neutral position regarding the proposed development and has provided a letter to this effect.	Winstone will further engage with QEII at the time of preparing the Substantive Application. Winstone has confirmed with both DOC and QEII that the covenant would remain in place and advised DOC of the obligations under the covenant. A copy of the memorandum dated 25/09/2025 is provided at Appendix D9.

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	Open Space Covenant 5-07-755	QEII's primary interest in this development is that the purpose and objectives of Open Space Covenant 5-07-755 (instrument no. 10476608.1) are upheld, and the open space values protected by this covenant are not compromised.	The proposed boundaries of the land exchange have been designed so as to not affect the areas defined in the Open Space Covenant (OSC). Winstone has agreed to undertake 10m revegetated planting on the edge of the Firth Block and pit face in response to QEII concerns about edge effects. This is offered as a condition of the exchange. See Appendix D9.
	Owner obligations	Regardless of ownership status, QEII will continue to monitor open space covenant 5-07-755 and ensure its purpose and objectives are upheld, as it has since this covenant was registered in 2016.	DOC has been consulted as the future owner of the covenanted land and has confirmed in writing that it is agreeable to leaving the QEII covenant in place. See Appendix D9.
Transpower New Zealand Limited			
	Engagement with Transpower	During ongoing consultation with Transpower, it was concluded that Transpower have 'no opposition' to the proposed land exchange. A letter to that effect is dated 16/10/25 is attached to the consultation report.	Winstone will use the Transpower letter in its application for land exchange, made to DOC. Winstone also undertook further consultation with Transpower after the decision to include the Southern Gully was made, Transpower have confirmed there is no issue with additional area being included via email.
	Transpower NG assets in the area	Transpower has two separate and independent transmission lines to cross the land that is to be swapped and become part of the Winstone Belmont quarry. This link is nationally significant.	Transpower has statutory access rights under the Electricity Act 1992.
	Transpower tower assets in the area	The Haywards - Melling B (HAY-MLG-B) is a 110kV transmission line that is closest to the existing quarry activity. The land identified for inclusion in the quarry contains two support towers on this line.	Through consultation it was ascertained that ROW Easement in Gross (favouring Transpower NZ Ltd) was not needed due to rights in the EA 1992.
	Transpower tower assets in the area	The Oteranga Bay - Haywards A (OTB-HAY-A) is capable of operating at 350kV and is the northern most of the two lines. The land identified for inclusion in the quarry contains two support towers on this line.	The footprint of DOC-Get was optimised to ensure that towers in the Oteranga Bay - Haywards A (OTB-HAY-A) Line are outside of DOC-Gets. No changes are needed.
	Existing access tracks	Existing access tracks maintained by Transpower are located within the land area to be transferred to the quarry. These tracks provide vehicular access to the line support towers for the transmission lines identified above. While the access tracks used and maintained by Transpower cross small segments of the legal road to be stopped, the access tracks do not rely on, or follow, the legal road.	In the vicinity of the National Grid towers there are two unformed 4WD vehicle tracks, which Transpower use for physical access to their Towers. One of these two access roads falls within the DOC-Give and therefore will be lost to private property as a result of this exchange. It was confirmed by Winstone and Transpower that the second of the two access roads remains a viable access option. No physical upgrades are needed to the second access track to allow Transpower access. An easement in gross (ROW) is also not needed as access is already provided under the Electricity Act
	Existing legal access	The Electricity Act grants Transpower the right to access tower structures situated on the land proposed for exchange.	The land swap itself will not alter the current use of the property or access via the existing track. Transpower's statutory access rights under the Electricity Act 1992 are not altered by the change in land ownership/management and no additional easements or rights-of-way are required.
	Transpower Position	Given the above, Transpower has no objection to the proposed land exchange proceeding. We look forward to continued engagement with Winstone Aggregates as the application advances, to ensure infrastructure considerations remain integrated into the process.	Winstone will engage Transpower for feedback at the time of preparing a Substantive Application.
	Transpower letter	We expect that Transpower will be asked to provide comments in relation to the land exchange application, as Transpower is an "other person" (section 17(5)), due to being an occupier of the land to which the substantive application relates and the land adjacent to that land (section 53(2)(i)).	Letter of 16/10/2025 noting Transpower has no objection to the proposed land exchange proceeding and provided at Appendix D10 .
Firth Industries (Firth)			
	Occupier	Firth is a tenant of Winstone who occupy part of the Belmont Quarry site. As an occupier of the land subject to this exchange, Firth is identified as a stakeholder. Firth Concrete supports this project as it secures long-term supply of aggregates essential for the development of Wellington region.	The letter of support for this project dated 01/12/2025 is provided at Appendix D11. Winstone will continue to engage at the time of preparing the Substantive Application.
Fulton Hogan (FH)			
	Occupier	Fulton Hogan leases premises immediately adjacent to the land exchange boundary.	The letter of support for this project dated 27/11/2025 is provided at Appendix D12. Winstone will continue to engage at the time of preparing the Substantive Application.
Holcim New Zealand Limited (Holcim)			

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	Occupier	Holcim (New Zealand) Limited is the leaseholder of the Premise and Access areas adjoining the proposed land exchange boundary.	The letter of principle support for this project date 5/12/2025 is provided at Appendix D13. Winstone will continue to engage at the time of preparing the Substantive Application.
	OTHER CONSULTATION		
	Persons and groups the applicant considers are likely to be affected by the project - Section 13(4)(j)		
	Kāinga Ora		
	Neutral position	During ongoing consultation with Kāinga Ora, it was concluded that KO have a neutral position towards to the proposed land exchange. A letter to that effect is dated 24/11/25 is attached to the consultation report.	The letter of support in principle for this project dated 24/11/2025 is provided at Appendix D14. Winstone will continue to engage at the time of preparing the Substantive Application.
	Friends of Belmont Regional Park		
	Swamp maire	The proposed overburden area sits within approximately 50 years of regenerating native forest that contains remnant swamp maire.	Change to Exchange footprint - OBDA footprint altered to avoid a natural inland wetland and swamp maire. Further Addition of Southern Gully block: swamp maire habitat and plating of 200 swamp maire.
	Swamp maire	The group raised concerns about the impacts of the land exchange on swamp maire. Further, the land proposed for exchange is unlikely to be as ecologically valuable as the park land considered for exchange.	This was considered in detail by Winstone's ecologist and amendments made to address concerns included revised footprint and addition of Southern Gully block with swamp maire habitat and planting of 200 swamp maire trees. Detailed ecological, lizard, bird and bat surveys were undertaken to provide more information about values of the OBDA.
	Net loss	The group noted the proposed exchange of 29 hectares of Regional Park land for up to 31 hectares of Fletcher owned land, including QEII land, was described as a net loss.	Change to the Exchange footprint - Addition of Southern Gully block: 3.9 hectares of land of higher ecological value.
	Dry Creek and invasive pampas grass	The group noted that the Dry Creek land proposed for exchange is dominated by invasive pampas grass.	Further investigations were undertaken in respect of the Dry Creek land and Winstone made amendments to the exchange footprint. The Improvement package proposes weed management at Dry Creek and restorative plantings.
	No meaningful recreational or ecological values at Dry Creek	FOBRP stated that the Dry Creek area holds no meaningful recreational or ecological value for the community.	Change to Dry Creek land parcel footprint - Dry Creek footprint reduced to remove land of lower conservation and recreational value. Surveys and foot count surveys were undertaken by Xyst to independently determine the recreational use of the OBDA area, which was confirmed to be low. Interviews were also conducted with GWRC Parks Ranger.
	Kelson Community Association		
	Consultation	Winstone provided a summary of proposal and September Stakeholder Update. A representative of Kelson Community Centre confirmed that the organisation has no interest in the Dry Creek area of Belmont Regional Park.	No further action needed. A copy of the email is provided at Appendix D.
	Pareraho Forest Trust		
	Consultation	<p>From: [REDACTED] Sent: Thursday, September 18, 2025 9:49 AM To: [REDACTED] (Winstone Aggregates) Cc: [REDACTED] (Winstone Aggregates) Subject: Re: Belmont Quarry Development - Pareraho Forest Trust</p> <p>Hi [REDACTED]</p> <p>Thank you for your email, and the attached information.</p> <p>Our Trust, at least informally, comes under the umbrella of the Friends of Belmont Regional Park, which is a collective of community groups and individuals active within the Regional Park. We are aware that you have been engaging with the Friends and we are satisfied at this stage that they represent our interests in this matter, we encourage you to keep working closely with them.</p>	No further action needed. A copy of the email is provided at Appendix D.

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		Yours sincerely, [REDACTED] Pareraho Forest Trust - Convenor	
		The owners of the land to which the application relates and the land adjacent to that land (section 53(2)(h) FTAA 2024.	
	Neighbours	The following properties were door knocked: [REDACTED]	Door knocked 7 properties. 4 of 7 properties no one was home. Left information pack and contact details if they had any additional questions.
	Neighbours	[REDACTED] - Ensure conditions of the consents look at discharge of sediment in Hutt River	Door knocked. Information pack supplied. Discharge from the OBDA will be considered as part of the substantive RMA approvals.
	Neighbours	[REDACTED]	Door knocked, information pack supplied. [REDACTED] is still under construction, the premise was unoccupied.
	Neighbours	[REDACTED]	Door knocked, information pack supplied. Spoke to [REDACTED] and [REDACTED]
	Neighbours	[REDACTED]	Door knocked, information pack supplied. Spoke to [REDACTED] and [REDACTED]
	Neighbours	[REDACTED] - Door knocked. Heald no concerns about the proposal and acknowledged the OBDA was moving farther away from property.	Door knocked, information pack supplied.
	Neighbours	[REDACTED]	Door knocked. Information pack supplied.
	Neighbours	[REDACTED]	Door knocked. Information pack supplied.
	Neighbours	[REDACTED] - Door knocked. Met with owner occupier who acknowledged the OBDA being located farther away than Cottle Block and was not opposed to the OBDA proposal. Primary concern and was landscape/outlook but understood the OBDA was beyond the Cottle. Requested blackberry weeds be controlled on the boundary of Fletchers land.	Door knocked. Information pack supplied. Winstone to include blackberry (weed pest) control in the Southern Gully improvement works.
		Waka Kotahi - New Zealand Transport Agency	
	Impact of land exchange on state highway 58 project	Waka Kotahi - NZTA had previously agreed with GWRC in 2017 to undertake ecological restoration works within the Belmont Regional Park as part of an ecological offset to remove exotic trees, undertake planning and weed control as part of the designation requirement to monitor, manage and mitigate the adverse effects of construction activities, arising from its State Highway 58 upgrade project. One of the sites identified for these offset works was within the OBDA. NZTA is currently investigating alternatives to relocate the offset planting within other areas of the Belmont Regional Park and has been in discussions with the GWRC, HCC and UHCC to do so.	Letter from NZTA that confirmed its only interest relates to the offset area and it is securing an alternative location. Once approved, NZTA will have no further interest in the land exchange. A copy of the NZTA letter dated 28/11/2025 is provided at Appendix D18.
	Impact of proposed exchange on state highway network	Waka Kotahi queried whether the exchange resulted in new access arrangements that would impact its state highway network	Further information provided to Waka Kotahi that confirmed the Exchange would not impact State Highway Network.
		Persons to be invited to provide written comment (Schedule 6, CI 25)	
		New Zealand Conservation Authority	
	Consultation	Winstone made attempts to contact NZCA, however were able to confirm times to discuss or meet.	Further engagement anticipated for substantive application. See Appendix D19.
		Wellington Conservation Board	
	Firth Block - weed and pest management	Key focus of discussion was the ecological connectivity of Firth Block and duration of weed and pest management proposed.	Replanting of edge protection in the form of Olearia, Kamahi, Kanuka to protect and restore ecological values. See Appendix D20.

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		New Zealand Fish and Game Council	
	Water quality	Confirmed the immediate site is unlikely to be a significant habitat of sports fish. Requested that sediment and erosion control consent conditions are incorporated with minimal sediment discharge into the Hutt River.	Erosion and sediment control is an important issue which Winstone is committed to managing at the time of preparing for Substantive Application. See Appendix D21.
		Game Animal Council New Zealand	
	Consultation	Winstone engaged the Game Animal Council through a formal letter and update, and the Council confirmed it had no comment and did not require further consultation.	No further action needed. See Appendix D22.