

# Invitation for comment on Belmont Quarry Development land exchange application under the Fast-track Approvals Act 2024



Department of  
Conservation  
*Te Papa Atawhai*

New Zealand Government

An application has been made by Winstone Aggregates under the Fast-track Approvals Act 2024 (the Act) for a land exchange application for Belmont Quarry Development (the project).

## How do I make a comment on the application?

- Fill in the details on the attached form and:
- **Email** the form to [landexchange@doc.govt.nz](mailto:landexchange@doc.govt.nz). Please mark in the subject line: "Comments on land draft land exchange application and Belmont Quarry Development; or
- **Post** the form the form to Land Exchange Fast-track Application, Conservation House, PO Box 10 420, Wellington 6143 in time for the form to be received by the date comments are due by.

Comments must be received by the Department of Conservation, on behalf of the Director-General of Conservation, no later than the date comments are due by. The Department of Conservation is not able to issue extensions of waivers to the deadline and may not consider comments received late.

If you are an iwi authority you may share the consent application with hapū whose rohe is in the project area in the application and choose to include comments from the hapū with any comments you may wish to provide.

## Closing date of comments

The closing date and time for sending objections or submissions to the Director-General on this matter is **26 February 2026**.

## Important information

Your personal information will be held by the Department of Conservation and used in relation to the land exchange application process. You have the right to access and correct personal information held by the Department of Conservation.

The Fast-track Team will forward copies of any comments received to Winstone Aggregates and they may be published on the Fast-track website.

Your name and organisation will be identified in the draft report, which may become publicly available. Having commented on the application, you will be invited to comment on the draft report that the Department of Conservation will prepare.

If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be provided to the Director-General of Conservation consideration on withholding that information from publication.

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All information held by the Department of Conservation is subject to the Official Information Act 1982.

# Comments on the Belmont Quarry Development land exchange application



Department of  
Conservation  
*Te Papa Atawhai*  
New Zealand Government

## Contact details

All sections of this form with an asterisk (\*) are mandatory.

|                                                                                         |                              |
|-----------------------------------------------------------------------------------------|------------------------------|
| Organisation name (if submitting on behalf of a business, community group, etc.)        | Wellington Botanical Society |
| *First and Last name                                                                    | Kate Jordan (Chairperson)    |
| *Email<br>(Communication from DOC will be via email unless alternate contact requested) |                              |
| Alternate contact for all DOC communication                                             |                              |
| *Phone/Mobile                                                                           | s9(2)(a)                     |
| Postal Address and Post Code                                                            |                              |

## We will email you the draft land exchange report for your comment

|                                                                                                      |       |
|------------------------------------------------------------------------------------------------------|-------|
| Please identify your preferred method for receiving the draft land exchange report for your comment. | Email |
|------------------------------------------------------------------------------------------------------|-------|

**X** I wish to **keep my contact details confidential**

**Note:** Your contact details will be not made public, but your name and organisation may be published alongside your commentary

**Please provide your comments on the land exchange application (use additional pages if required)**

These comments are additional to those in our letter of 18<sup>th</sup> September 2025, attached at the end of this document.

We confirm our continued opposition to the proposal to swap ecologically rich DOC land for private land and to use present Belmont Regional Park land as an overburden deposit site.

Our submission focuses on the loss of maire tawake (*Syzygium maire*), as this endemic species is Threatened-Nationally Vulnerable under the New Zealand Threat Classification System.<sup>1</sup> Maire tawake is considered to be in serious decline throughout its range. Fewer than 100,000 individuals are thought to exist, with a decline in population of 30-50% expected over the next three generations. In the Wellington region it is also considered Vulnerable and fewer than 1,000 individuals are estimated.<sup>2</sup> This is due to historical fragmentation of its habitat and the arrival of myrtle rust (*Austropuccinia psidii*) to New Zealand. Activities such as the proposed land use changes cause further fragmentation of suitable habitat and increase the vulnerability of an already threatened species. Ramarama (*Lophomyrtus bullata*) (Threatened-Nationally Critical,<sup>1</sup> Regionally Critical<sup>2</sup>) is also present on the site.

We have reviewed the changes to the proposal. While the concession to move the southern part of the western boundary eastwards to exclude fourteen 6-10m maire tawake is good,<sup>3</sup> the plan to deposit quarry overburden upstream will alter the hydrology of the site and very likely kill the trees, regardless.<sup>4</sup> Maire tawake relies physiologically and ecologically on high-moisture soil and it is highly susceptible to disturbance. It should be noted that eight of these trees have fruited in the past month, representing an important seed source for further regeneration of maire tawake.

The ecological offset proposal to plant 200 maire tawake in Southern Gully is a reasonably positive action, but biodiversity offsetting like this means accepting ecological losses for uncertain ecological recompense or gains.<sup>5</sup> These trees may take decades to reach maturity and there is no guarantee they will persist that long. The loss of ecologically complex forest and wetland is not adequately compensated by a gain of regenerating scrub, nor the loss of mature flowering and fruiting plants (with successful recruitment evident) by the establishment of a grove of young saplings. The ecological assessment estimates the age of the existing swamp maire to be 50 to 60 years.<sup>6</sup> The Wellington Botanical Society fails to see the 'net ecological gain' from destroying 24 of these healthy in-situ trees, along with their habitat, and replacing them with 200 young plants to be managed for five years. We also consider the proposed 'attempts to transfer the existing nine swamp maire in the OBDA by way of whole tree or pruned tree and root ball transfer' a cynical and poorly thought-out offer that is unlikely to have a positive outcome.

<sup>1</sup> de Lange et al., 2023. *Conservation status of vascular plants in Aotearoa New Zealand*.

<sup>2</sup> Enright, et al., 2025. *Conservation status of indigenous vascular plants in the Wellington region*

<sup>3</sup> BlueGreen (2025). *Belmont Quarry Land Exchange: Overview of Ecological Values*.

<sup>4</sup> Landscape Dynamics Ltd, December 2025. *Belmont Quarry: Hydrological analysis of proposed land exchange*. pp. 5, 7

<sup>5</sup> BlueGreen (2025). *Belmont Quarry Land Exchange: Overview of Ecological Values*. p. 19; Bull et al. (2013). Biodiversity offsets in theory and practice. *Oryx*, 47(3), 369-380.

<sup>6</sup> BlueGreen (2025). *Belmont Quarry Land Exchange: Overview of Ecological Values*. p. 62

We wholeheartedly oppose the proposed land swap. The sacrifice of 'DOC-Give' area for the 'DOC-Get' would be a net loss to biodiversity in the Wellington region and set back an area of Belmont Park's regeneration by decades. The ecological report underrepresents the biodiversity value of the DOC land and overstates that of the Winstone Quarry. The 'DOC-Give' area has significant biodiversity, harbours several nationally threatened species, and has a long history of natural regeneration. The land held by Winstone is in its earliest stages, has minimal biodiversity value, and will require significant investment for many years to achieve parity with other parts of the park.

Ngā mihi,  
Kate Jordan  
Chairperson  
Wellington Botanical Society

#### Links to relevant documents:

BlueGreen (2025). *Belmont Quarry Land Exchange: Overview of Ecological Values*:

[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0021/19434/B1-Ecological-Assessment\\_Redacted.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0021/19434/B1-Ecological-Assessment_Redacted.pdf)

de Lange, *et al.*, 2024. *Conservation status of vascular plants in Aotearoa New Zealand*:

<https://www.doc.govt.nz/globalassets/documents/science-and-technical/nztcs43entire.pdf>

Enright, *et al.*, 2025. *Conservation status of indigenous vascular plants in the Wellington region*:

<https://www.gw.govt.nz/assets/Documents/Documents/2025/12/Conservation-status-of-indigenous-vascular-plants-in-the-Wellington-region.pdf>

Landscape Dynamics Ltd, December 2025. *Belmont Quarry: Hydrological analysis of proposed land exchange*:

[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0021/19443/B9-Hydrology-Assessment\\_Redacted.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0021/19443/B9-Hydrology-Assessment_Redacted.pdf)

Previous letter: [https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0028/19459/Appendix-D1-to-D22\\_Redacted-v2.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0028/19459/Appendix-D1-to-D22_Redacted-v2.pdf)

#### Previous letter of 18<sup>th</sup> September 2025 on proposed land-swap by Winstone Aggregates

Tēnā koe Rachael,

I am writing on behalf of the Wellington Botanical Society. We have a membership of approximately 200 professional and amateur botanists. We aim to encourage the study of botany (particularly New Zealand flora), foster an interest in New Zealand's native plants, and advocate for the protection, under protected area statutes, of lands and waters.

With these aims, we wish to express our concern of, and opposition to, the proposal to swap DOC land for private land for use as an overburden deposit site. We understand this area to be within [the rectangle represented here](#).

We wish to bring a few matters to the attention of the project team at DOC considering the overburden proposal. First, is recent research on maire tawake *Syzygium maire* in the Wellington region published by the School of Biological Sciences at Victoria University.<sup>7</sup> The authors highlight that we 'need to identify refugia in accessible, albeit sometimes fragmented, habitat' and recommend 'leveraging human–nature interactions in areas to create, expand, and protect habitat for [this] rare species in a rapidly changing world'. *Syzygium maire* has a threat

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<sup>7</sup> Herbert, S. M., Tomscha, S.A., Lai, H. R., Benavidez, R., Balkwill, C. G., Ruston, P. R., Jackson, B., & Deslippe, J. R. (2025). Identifying potentially suitable and accessible refugia to mitigate impacts of an emerging disease on a rare tree. *Conservation Biology*, e70088. <https://doi.org/10.1111/cobi.70088>

classification of Threatened-Nationally Vulnerable.<sup>8</sup> The article illustrates that *Syzygium maire*'s preferred habitat of waterlogged areas in the Wellington region are few and shrinking.

Second, is the number of recently observed *Syzygium maire* in the proposed overburden deposit site. These can be seen at [this link](#). Given that their habitat is shrinking, an area that hosts so many *Syzygium maire* is, in our view, rare and precious.

Third, a large proportion of the land area under consideration for development is classified as a Category 1 threatened environment, indicating that less than 10% indigenous land cover of this type remains intact in Aotearoa New Zealand.<sup>9</sup> This is the most threatened status allowed by this classification. Other species recorded in the area at risk are *Coprosma rubra* (with a national threat status of declining and regional status of uncommon) and *Lophomyrtus bullata* (with a national threat status of nationally critical and regional status of critical).

We hope this information is of use to the project team at DOC.

Ngā mihi,  
Kate Jordan Chairperson Wellington Botanical Society

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<sup>8</sup> Peter J. de Lange, Jane Gosden, Shannel P. Courtney, Alexander J. Fergus, John W. Barkla, Sarah M. Beadel, Paul D. Champion, Rowan Hindmarsh-Walls, Troy Mekan and Pascale Michel, *New Zealand Threat Classification Series* 43.

<sup>9</sup> Cieraad et al, *New Zeal J Ecol.* 39, 309–315 (2015)

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## Attachments

If you are using attachments to support your commentary, please clearly label each attachment, complete the table below and send in your attachments with this form.

| Document title | Document format (e.g. Word, PDF, Excel, jpg etc.) | Description of attachment |
|----------------|---------------------------------------------------|---------------------------|
|                |                                                   |                           |
|                |                                                   |                           |