

New Zealand Conservation Authority – Comments under the Fast-track Approvals Act 2024

Belmont Quarry Development

1. Introduction

The New Zealand Conservation Authority (**NZCA**) acknowledges and appreciates the opportunity given by the Expert Consenting Panel (**Panel**) to comment on this application, pursuant to section 35 of the Fast-track Approvals Act 2024 (**FTAA**). The NZCA offers these comments in line with its statutory role as an independent body established under the Conservation Act 1987. The Authority's responsibilities include advising on matters of national conservation importance, overseeing the development and implementation of conservation strategies and plans, and ensuring the management of natural and cultural resources aligns with the principles of the Treaty of Waitangi.

In doing so, the NZCA offers a national conservation perspective to help the Panel ensure the application is assessed in a way that protects the environment, statutes, and mana whenua rights. The Authority acknowledges the significance of infrastructure development at a national level but stresses that such development must not compromise Aotearoa's conservation duties or the Crown's responsibilities under Te Tiriti o Waitangi.

Key priorities for the NZCA are upholding Treaty principles embodied in Section 4 of the Conservation Act, the implementation of Te Mana o te Taiao New Zealand Biodiversity Strategy, and the protection of native biodiversity and taonga species. The NZCA also

supports DOC's duty under the Conservation Act *to foster the use of natural and historic resources for recreation.*

The following comments are based on the application and material required under section 18 of the FTAA, which identifies relevant iwi authorities, Treaty settlement entities, and MACA applicants, as well as the Crown's statutory obligations in relation to existing Treaty settlements and customary rights. The NZCA's views on this proposed land swap also take into account the recreation and ecosystem values.

2. Application Summary Relevant to NZCA Functions

The Land Exchange application related to the Belmont Quarry Fast-Track application relates to land that is Crown-owned and was set apart as a recreation reserve under the Reserves Act 1977 (**the Act**) in June 1989. In 1991, the Greater Wellington Regional Council (**GWRC**) was appointed by the Minister of Conservation to control and manage for recreation purposes the Dry Creek Recreation Reserve with the underlying freehold interest in the land remaining vested in the Crown.

Recreational reserves are classified under section 17 of the Act for the general purpose of:

...“providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside.”

Recreational reserves are also administered for the further purposes of:

(a) The public having freedom of entry and access to the reserve... subject to such conditions and restrictions as the administering body considers to be necessary for the protection and general well-being of the reserve and for the protection and control of the public using it.

(b) where scenic, historic, archaeological, biological, geological, or other scientific features or indigenous flora or fauna or wildlife are present on the reserve, those features or that flora or fauna or wildlife shall be managed and protected to the extent compatible with the principal or primary purpose of the reserve....

(c) those qualities of the reserve which contribute to the pleasantness, harmony, and cohesion of the natural environment and to the better use and enjoyment of the reserve shall be conserved:

(d) to the extent compatible with the principal or primary purpose of the reserve, its value as a soil, water, and forest conservation area shall be maintained.

The GWRC Parks Network Plan, Toitū Te Whenua (2020–30), has identified Belmont Regional Park as a place of regional significance for recreation, conservation, landscape character, and cultural heritage. In terms of landscape values, the Plan recognises that “the park contributes to the legibility and identity of the Wellington landscape, particularly through its ridgelines, open spaces, and scenic views”. Mining and quarrying are prohibited activities in Belmont Park in Toitū Te Whenua.

For Belmont Regional Park the Natural Heritage Goal is to “*Protect and restore high levels of terrestrial and freshwater ecosystem health to enhance biodiversity and ecosystem services*”.

The Recreation Goal states “*Parks are highly accessible places for many visitors to enjoy; they offer a variety of interesting experiences, enhancing the health and wellbeing of local communities and broader regional economy*”, and the Cultural Heritage Features and Landscape Values Goal is “*A variety of landscape settings are preserved and enhanced reflecting social values; historic heritage features are protected and interpreted for visitors*”.

The land is not classified under any of the protected reserve categories listed in Schedule 4 of the FTAA 2024. The Act enables the exchange of public conservation land with a Fast Track project where the exchange will result in a net benefit for conservation. The Minister of Conservation must be satisfied that an exchange will result in a net-conservation benefit in order to approve the transaction, and must consider (but is not bound by) Chapter 6 of the Conservation General Policy. This policy states:

6 (d) Subject to policy 6 (c), land disposal should not be undertaken where the land in question either:...

vii. secures practical walking access to public conservation lands and waters, rivers, lakes or the coast.

The FTAA Section 29 provides “Criteria for Panel” when considering a land exchange, and of particular relevance in this context (1)(a) (ii)-(iv):

(ii) the conservation values of the land concerned, including how threatened or abundant they are, and a comparative assessment of the values that relate to each area of land concerned; and

(iii) the financial implications for the Crown of the land exchange; and

(iv) whether the consequences of the land exchange would be practical to manage on an ongoing basis...”.

3. Section 4 Considerations

With respect to Section 4 of the Conservation Act 1987, and giving effect to the Principles of the Treaty of Waitangi, the documentation provided by the applicant refers to consultation that has been undertaken with Taranaki Whānui ki te Upoko o Te Ika, Ngāti Toa Rangatira, Te Āti Awa Nui Tonu, Rangitāne Tū Mai Ra, and Muaūpoko on cultural acceptability and tangata whenua-specific conditions, but as the material reporting on this has been almost completely redacted it is not possible for us to understand the nature and outcomes of that consultation.

4. Land exchange proposal assessment

The Land exchange component of this proposal refers to land parcels as *DOC-Get* and *DOC-Give*.

The DOC-Get land is stated to consist of 34.11 ha, composed of 4 blocks of land – Northern Gully (12.62 ha of which 2.9 ha are protected by an existing Queen Elizabeth the Second National Trust (**QE II**) covenant), Southern Gully (3.94 ha), Firth Block (9.6 ha, protected by a QE II covenant), and Dry Creek (7.9 ha). The DOC-Give land is stated to be 23.86 ha. The QE II areas were covenanted to offset previous quarry expansion. The parcels of land being offered in exchange for PCL have in the past received clean fill (Northern Gully), overburden and extraction (Firth Block), extraction and clean fill (Dry Creek), and solely clean fill (northern end of Southern Gully).

Thus, the proposal is to exchange 23.86 ha of Public Conservation land for 21.6 ha of private land with an additional 12.5 ha of land already protected through QE II covenants.

The parcels of land in the DOC-Get offer are not contiguous. In the case of the Northern and Southern Gully parcels the DOC-Get land is adjacent to a number of rural-residential properties in private ownership. The land designated as DOC-Give (to be the Overburden Development Area – **OBDA**) is surrounded on 3 sides by the Belmont Regional Park and the fourth side shares a boundary with the existing quarry.

All of the land being considered has been modified to a greater or lesser extent by human activities. There are important habitats for a range of invertebrate and vertebrate species and well as a range of land plants and aquatic organisms. Active restoration has been underway with a number of volunteer groups and guided by the Restoration plan of GWRC “Recloaking Papatūānuku”, and guidance provided by GWRC (refer website).

The fact that the DOC-Get land is in separate parcels raises questions about the ability of these parcels to serve as corridors for species. Generalising about corridor functions is difficult – as species/seeds/spores have very different trajectories and ways of moving within the environment, as well as time frames over which such movement occurs. It is not clear how this fragmentation will influence species and communities. The loss of the DOC-Give block will also mean the loss of the regenerative aspects of native seedbank that has been building up in the approximately 50 years of recovery, revegetation and pest management that has been undertaken in the area.

Within the past week (reported 10 February 2026) in the OBDA, 11 swamp maire trees were found to be fruiting, with seedling plants beneath them from previous years. These were located in four areas across the proposed OBDA. The Friends of Belmont Regional Park now report 16 swamp maire in the OBDA area. In addition, more Ramarama (*Lophomyrtus bullata*) have been located. Swamp Maire has “Threatened - Nationally Vulnerable” status and Ramarama “Threatened - Nationally Critical” status in the DOC Threatened Species system and both are listed as “Critically Endangered” in the IUCN Red List.

The boundary lengths of the parcels proposed to be transferred to DOC exceed the boundary lengths of the land proposed for the OBDA. The neighbouring rural / residential properties, particularly in the Northern and Southern Gully parcels, present a number of issues if the land is transferred to DOC, in terms of management of incursions of weeds and pest species/predators from neighbouring private owners, who may or may not be operating weed and pest control measures that harmonise with those proposed for the DOC-Get land. Pest and weed control will have on-going associated

financial implications for the Crown, relevant to the criterion “*whether the consequences of the land exchange would be practical to manage on an ongoing basis...*”.

The fragmentation also will affect the recreational values of the area. The proposed OBDA comes right up to Buchanan’s Walking Track and changes to the land in the OBDA will be visible from just under half of the Buchanan Track, and from sections of the Dry Creek Loop Track. There are issues about public access to the Dry Creek area with the proposed OBDA abutting the main track. The DOC-Get land consists of areas where there is no (or very little) public access and enabling public access will be very challenging based on the terrain. Given the land being transferred is currently a Recreation Reserve it is not clear how *the exchange will result in a net benefit for conservation* and, in particular, for the purposes this land is held. Given the terrain and access issues, NZCA questions the opportunities and costs for enabling recreation on the DOC-Get parcels.

In the Ecological Assessment of the Belmont Quarry Land Exchange the authors compared the DOC-Give area (23 ha that is known to include a variety of habitat types and ecological values) with the smaller parcels of land being proposed for exchange. In our opinion this led to a downgrading of the values present in portions of the DOC-Give land, where values were averaged across the whole area. While there may be currently negligible ecological values in some areas of the DOC-Give parcel (e.g. central exotic pine and grassland ridge), there are areas with potential for further recovery including wetland habitats. Natural inland wetlands are regionally rare (<3% remaining Regionally). The Ecological Assessment notes the presence of a wetland and wet gullies in the DOC-Give land which also represent important habitats with potential for swamp maire. As noted above there are both mature and young swamp maire within the OBDA. Wetlands in New Zealand have been reduced to ca. 10% of the pre-human cover and swamps to ca. 6% of their original extent. Given their ecological importance and the threats on these habitats, NZCA considers the potential loss of any such areas needs to be taken very seriously.

5. NZCA Position and Recommendations to the Expert Panel

The NZCA thanks the Panel for the opportunity to comment on this application under the FTAA. NZCA **recommends against the exchange of land** given:

- the NZCA does not consider this exchange will result in a “*net benefit for conservation*” as required by the Act,
- the lack of visibility in relation to iwi consultation,
- the reduction in biodiversity and habitat protection – currently 36.36 ha (consisting of 23.86 ha PCL and 12.5 ha QE II covenant) compared with 21.61 ha (consisting of 34.11 ha that includes the QE II covenant), including loss of habitats and investment over the past ca. 50 years in regeneration of the native flora and fauna,
- the significant border of two of the land blocks with rural/residential properties and increased issues and costs associated with weed and predator control,
- the reduction in public access and likelihood of recreational opportunities given the terrain, fragmentation and state of parcels being offered.