

To: Fast-Track Panel – FTAA-2603-L003

Date: 14 June 2026

From: Wellington Botanical Society



Comments on the Draft Report – Belmont

Quarry Land Exchange

Tēnā koutou,

The Wellington Botanical Society (WBS) thanks the Department of Conservation (DOC) for the opportunity to comment on this draft report. These comments supplement our submissions of September 2025 and February 2026. We remain firmly opposed to the proposed exchange. The legal test in clause 29(2) of Schedule 6 of the FTAA requires the Panel to be satisfied that the exchange will *enhance* the conservation values of land managed by the Department. On the Department's own evidence, that test is not met.

1. Flora values – a net loss, not a gain

DOC's assessment (Table 8 of the Draft Report) rates the DOC-Give site at *Moderate–High* for flora and the composite DOC-Get sites at *Low–Moderate*. This gap persists even when the applicant's proffered improvements are included (Table 10). The DOC-Give site contains the only population of *Syzygium maire* (swamp maire, Threatened – Nationally Vulnerable) in Belmont Regional Park, sections of WF8 kahikatea/pukatea forest (Regionally Critically Endangered, 1% remaining), and a weed-free, structurally intact wetland gully system. None of the DOC-Get sites approach this botanical value. Flora is the primary domain of the Society's expertise, and the exchange clearly represents a net loss on this criterion alone.

2. The QEII discount negates any terrestrial fauna gain

The Draft Report acknowledges the legal uncertainty created by the Fast-track Approvals Amendment Act 2025, which inserted clause 29(2A) requiring the Panel to discount conservation values attributable to QEII covenants on the DOC-Get titles. This matters because Dr Burns' assessment states explicitly that *without the QEII sites*, the DOC-Give and DOC-Get are of comparable terrestrial fauna value. The entirety of the Firth Block (9.6 ha) and 2.87 ha of the Northern Gully are already covenanted in perpetuity. Treating existing permanent protection as an offset for new destruction is not enhancement.

3. Freshwater values unchanged; recreation values fall

The DOC assessments (Tables 3 and 4) record freshwater ecology remaining at *Moderate–High* for both sides of the exchange, while recreation values declining from *Low–Medium* (DOC-Give) to *Low* (DOC-Get). Taken together with the flora net loss and the conditional nature of the fauna gain, the exchange fails the enhancement test across every dimension within WBS’s scope of interest.

WBS urges the Panel to decline this application. Should it be approved, the Society requests as minimum conditions: a swamp maire offset ratio of no less than 200:1 (i.e. at least 1800 plants, following the 2019 NZTA precedent); a funded long-term weed and pest management programme extending well beyond the applicant’s proposed five years; and hydrological monitoring to assess impacts on swamp maire retained outside the immediate OBDA footprint.

Ngā mihi,
Kate Jordan
Chairperson
Wellington Botanical Society