



Belmont Quarry Development – Part F

Substantive Application
Appendix F.4 – Applicants Response to
Comments Received under s.35
Winstone Aggregates

16 August 2026



Memo

To:	Jade Wikaira; Wikaira Consulting Ltd	Project:	2529
From:	Tony Payne; Blueprint Ecology Ltd	Date:	3 March 2026
Subject:	Belmont Quarry Land Exchange: Applicants response to The Friends of Belmont Regional Park; lizards		

Winstones Aggregates Limited is in a process with the Department of Conservation (the Department) to swap an area of Belmont Regional Park in exchange for four areas known as Northern Gully, Southern Gully, Firth Block and Dry Creek (the exchange sites).

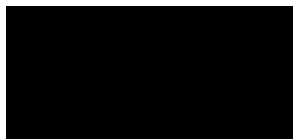
The Friends of Belmont Regional Park has provided feedback during processing to an application for the land exchange. Their sole comment regarding lizards is as follows:

30. The Lizard assessment (Appendix B2, Table 3) summarises the values of lizard habitat. Including the QEII areas gives a total DoC-Get value of 33.19, compared with 18.83 in the POBDA. If the QEII areas, being already conserved, are excluded from the calculation, the the DoC-Get value drops to 19.27, only marginally greater than that of the regional park lands. We note that herpetofauna field observations were restricted to the POBDA and extrapolated to the DoC-Get areas based broadly on forest types. Again, we conclude that there would be little change to the lizard habitat values.

Our assessment covered all areas of the land exchange and surrounding areas, including the OBDA, Northern Gully, Southern Gully, Firth Block and Dry Creek. The assessment included a desktop analysis and on-site habitat assessments over multiple site visits. A further extensive survey program was undertaken within the OBDA at the request of the Department. The Department agreed with Blueprint Ecology Ltd that due to the high survey effort allocated in the OBDA, the close proximity of the exchange sites and OBDA and overall similarity in vegetation cover/ habitat, the results from the OBDA would be analogous across the exchange sites. The results of our assessment have been corroborated by previous surveys in the area.

We understand that the extent of lizard habitat in the QEII covenant areas are to be considered in the application.

Yours sincerely,



Tony Payne
Principal Ecologist¹



¹ This report has been prepared by Blueprint Ecology Limited on the instructions of our Client in accordance with the agreed scope of work. It is intended to support the Client's application for a land exchange and may be relied upon by the Department of Conservation and relevant administering agencies for the purposes of assessing the application. While Blueprint Ecology Limited has exercised due care in preparing this report, it does not accept liability for any use of the report beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

Addendum

To Belmont Winstone's – Department of Conservation land exchange report: **BlueGreen (2025) Belmont Quarry Land Exchange: Overview of Ecological Values. Report prepared by BlueGreen Ecology Ltd for Winstone Aggregate Limited**

The following are responses made by the authors (Dr Keesing and Dr Bull) of the afore mentioned technical ecology report and hold the qualifications and experience as laid out in that report. The authors agreed to adhere to the Environment Court Code of Practice, in respect of the report and this addendum.

We have carefully considered the comments and material provided by NZ Conservation Authority (NZCA), Wellington Botanical Society (WBS), New Zealand Transport Authority (NZTA), the Wellington Conservation Board (WCB), and the Friends of Belmont Regional Park on the proposed DOC-Winstone's land exchange at Belmont Regional Park, in response to ecology. For ease of reference, the issue raised, and our response, is set out below.

NZCA made the following points:

NZCA raised:

"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. Generalizing about corridor functions is difficult – as species/seeds/spores have very different trajectories and ways of moving within the environment, as well as timeframes 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."

Our response is:

That there is no fragmentation, only a change to where the bush edge is in one location for a limited time. While these areas may be legal separate parcels they are all connected to the park physically by adjoining vegetation and will remain so after the OBDA is in operation.

NZCA raised:

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.

Our response is:

We are aware of 17 swamp maire (as well as the presence of new seedlings) in the DOC-give area. To our knowledge only 5 swamp maire sit within the proposed footprint of the OBDA, which is smaller (at around 15ha) than the proposed exchange land at around 24 ha). The impact of the proposed OBDA will be considered at resource consent stage.

The ecological assessment acknowledges the threatened status of Swampmaire and Ramarama. This is well covered in our report.

The comments received have largely ignored or dismissed the improvement plantings offered by Winstone (being 200 swamp maire).

NZCA raised:

The boundary lengths of the parcels proposed to be transferred to DOC exceed the boundary lengths of the land proposed for the OBDA. The neighboring 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 neighboring 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 ongoing 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 ...".

Our response is:

The current boundary between quarry and vegetated park is Ca. 550m and there will be (in stage 1) a new open area around 500m (discounting the haul road which is through the open pasture pine now), and by stage 2, 800m but from there it remains generally around 800-1000m and is progressively advanced back through the OBDA with revegetation. The maximum if all stages are open is around 1500m (3 times the current edge).

We do not consider that the proximity to weed populations materially changes and whatever the area, weed management is required and will be on going for the life of the quarry, but also in perpetuity in the Park (we assume) and can be managed accordingly.

The DOC-Give itself has a number of persistent weeds and old mans beard appears randomly throughout most of the areas. We consider that the exchange DOC-get land contains more mature forest areas and is also more resistant to weed invasion than the younger DOC-Give area (which includes later seral canopy weeds such as pine and holly). Management and its funding of the DOC-get land has been proposed by Winstone as a condition of the exchange to reduce this risk (BlueGreen (2025) page 90, Table 20; Wikaira Consulting (2025), page 92-93).

NZCA raise:

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.

Our response is:

We appreciate that in the wider mix of the DOC-give land there are some higher value areas related to special species or wetland, but these areas are the minority and we consider the averaged value approach adopted in our report best represents and does not hide the actual ecological value.

We have adopted the same approach to the DOC-Get land. The same could be said of the “give” parcels which sum to more than the get exchange.

Further, while potential value does not factor into our assessment as value is as it is today, all areas have a range of potential values. That in mind, the averaged result was tempered with an increased focus on the greater values of especially swamp maire and its habitat even where the majority of land cover is young common seral broadleaf stages. This has led to a focus on ensuring proposed weed control improvements and commitment to establish 200 swamp maire in suitable wetland habitat.

Wellington botanical society (WBS) made the following observations to which we reply

WBS raised:

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. Maire tawaka 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 few than 1,000 individuals are estimated. 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, Regionally Critical) is also present on the site

Our response is:

As discussed in the planning and legal comments the land exchange does not result in the destruction of these plants. The land exchange proposal offers 200 new plants in habitat found to be suitable within the DOC-Get land as part of the exchange to increase the conservation values of the DOC-Get land by creating a significant swamp maire area. (a 20% increase of the current estimated number of 1000 swamp maire estimated by WBS in the Wellington region). These plants will be grown up and established in the DOC-Get area which is suitable habitat.

The improvement proposed in the exchange application will be in the order of 200 new swamp maire in DOC-Get land (BlueGreen (2025), page 90, table 20). The methods proposed included taking seedlings and cuttings to secure the genetics of the swamp maire in the DOC-Give land. There appears to be little natural seed dispersal establishing new populations in the park and so through this process we aim to ensure establishment of a new large population of swamp maire in the park.

WBS raised:

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, the plan to deposit quarry overburden upstream will alter the hydrology of the site and very likely kill the trees, regardless. 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.

Our response is:

These effects arise from the development of the proposed overburden disposal area, rather than the land exchange, and accordingly will be assessed in detail at a later stage.

WBS raised:

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. 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. 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.

Our response is:

The establishment of 200 new swamp maire in the southern gully is not an ecological offset, as those values are not destroyed by the exchange. Ecological offset as a concept is covered within the Legal submission accompanying Winstone’s response. The 200 new swamp maire Winstone proposes is part of an improvement to provide a net benefit to conservation values in favour of DOC. The action is to cause a net gain from the land exchange.

The potential effects of the use of the OBDA includes the potential loss of swamp maire within the OBDA. A separate management process including a risk removal offset is proposed which involves the rearing and planting in new areas a further 50-100 plants in the exchange but outside the OBDA and suitable local areas within the park (there are several). The plan is to safe guard against the possible failure of the proposed transplantation of the swamp maire. If the transplantation does succeed there will be a significant net gain in swamp maire and increased distribution in the local area. In addition, there will be cuttings taken from the affected trees (there is no swamp maire forest) for plant establishment to try to save the genetic material, this will include also taking seed from those affected maire too. These ecological offset proposals will form part of the substantive application for resource consent approvals for the OBDA, and will be assessed further at that stage. They are discrete from the improvement package (planting 200 new swamp maire) that is proposed as part of the land exchange.

WBS raise:

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.

Our response is:

We consider the entire exchange proposed will result in a net benefit in favour of the Conservation Estate. The outstanding value in the exchange is the swamp maire (predominantly in the DOC-Give), this has been balanced by the improvement being offered that provides for establishing 200 swamp maire in the

DOC-Get area. The conservation values of the DOC Get land are further supported by the presence of tawa kahikatea forest within the northern gully, which is regionally rare.

WBS raise:

We wish to bring a few matters to the attention of the project team at DOC considering the overburden proposal. First, is a recent research on maire tawake *Syzygium maire* in the Wellington region published by the School of Biological Sciences at Victoria University. 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 classification of Threatened-Nationally Vulnerable. 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 to many *Syzygium maire* is, in our view, rare and precious.

Our response is:

The proposal takes this study into account (it is discussed in our ecological report at page 84) (and we applied the guidance provided in this publication (BlueGreen (2025) at page 84) to review our findings and to develop a local model for locating suitable swamp maire habitat) and our proposal seeks to increase swamp maire numbers and expand areas of maire (also note section 9.3 of our report). This is, we believe, as the authors of the publication recommend i.e. “leveraging human-nature interactions”.

WBS raise:

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. 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).

Our response is:

This is true and is the condition of almost all of the lowlands (the primarily rural land) of New Zealand – a very large area - and that threat classification was taken into account in the assessment. There is no loss of indigenous land cover from the land exchange. The substantive application for resource consent will, in managing effects, recognize these special species too and has a proposed management response directed at avoiding any losses. We do note that *Ramarama* is also found in the DOC Get areas.

WBS raise:

The birdlife values we rate as equally high in both Doc-Give and DOC-Get. We note that Table 19 in Appendix B1 (Ecological Assessment) scores the Caspian tern and shag species as being in the Firth QEII but not in the POBDA area. Similarly, Table 4 (p25) states that the acoustic recorder AR3 (Lake) was in the Firth Block, whereas in fact the pond where these species were recorded straddles the boundary of both blocks, and the acoustic recorder (AR3) was installed at the boundary fence. We also note that one of the acoustic recorders (AR4) had not been analysed by the time the Ecological report was compiled. We conclude that there would be little change to the avifauna ecological values.

Our response is:

As per Table 4 in the report (replicated below), the AR3 was situated on the Firth Block, but the habitat it was sampling was the lake and surrounding late seral broadleaf forest. As such, the section of lake and any associated late seral broadleaf forest within the DOC- Give would have the same values as the part on the DOC- Get land within Firth Block. However, that value is confined to that habitat feature (pond and wider surrounding area) and is not afforded the entire DOC-Get land. This is already covered in detail in our 2025 report, at 7.1 (Page 66-69). The following table is copied below for the convenience of the Panel. We have reviewed our findings in the updated ecological report in light of that comment and confirm that the updated ecology report as assessed is correct.

Extract from our report:

Table 4: Bioacoustic recorder deployment details (locations shown in Figure 11 and updated recently (26 February 2026 update) with the additional bioacoustics data)

BIOACOUSTIC RECORDER	HABITAT	SITE	RECORDING PERIOD
AR1 (Tawa)	Tree free and tawa-kāmahi forest	Northern gully	17-24 July 2025
AR2 (Exotic)	Ridgeline exotic treeland and young gorse/pasture	OBDA	17-24 July 2025
AR3 (Lake)	Lake surrounded by late seral broadleaf forest	Firth Block QE II	17-24 July 2025
AR4 (Manuka)	Manuka mixed broadleaf forest	OBDA	13-19 August 2025

Wellington Conservation Board (WCB) has the following comments

WCB raise:

The Greater Wellington Regional Council has embarked on a generational restoration plan for the park, including retirement and replanting of significant areas of farmland. Greater Wellington is involved in discussions with adjacent landowners, and other agencies with ecology restoration obligations associated with other progress.

Our response is:

That is understood and it is anticipated that this project contributes to that endeavor in quite a significant way.

WCB raise:

A swamp maire restoration (200 trees) is proposed as part of the conservation gain initiative, as well as other replanting efforts. Through the Friends, Dr Colan Balkwell provided the following comment: *“It is hard to envisage how the proposed swap could provide land that is ecologically valuable as the park land considered for exchange”*. This view is consistent with a range of opinions shared with the Board. We are concerned that the offset proposal does not clearly specify the duration propagation and planning swamp maire, or how security of long-term funding would be protected. The timeframe and certainty of weed and pest control, and regeneration efforts, is an important consideration in assessing overall conservation outcomes. Sourcing suitable native species for replanting activities is a challenge in the Wellington region, and assured long-term approach should be incorporated into plans.

The Board believes that these activities should be assured for a time appropriate to mitigate the area potentially lost to the land swap. We believe this would be in the vicinity of 30-40 years and aligned with economic life of the quarry. The board supports the BlueGreen recommendations attempting to translocate 9 of the swamp maire to another location. Where practical, areas or species of significance should be protected from disturbance for as long as possible, including adopting a planning approach of avoidance by default.

Our response is:

The land proposed for exchange (proposed DOC- Get land) is still part of the wider Belmont hills landform and biogeographical condition, it is not alien to the park and offers a rare larger wetland area. It has ecological value.

It is important to note that the improvement package is a conservation gain, not an offset for a loss or removal of vegetation.

In the absence of observed new populations of swamp maire establishing locally by themselves (in the park), we consider that the Winstone proposed improvement package to establish a large swamp maire forest in suitable habitat and to provide the necessary resources to do so. This might be one of the few initiatives that will establish new areas of swamp maire around the park, and is a valuable conservation opportunity. This project has the potential to substantially increase the population of swamp maire in the Region and provides an excellent opportunity for restoration, study and research into the species (we note the support for the experimental translocation of while swamp maire)– all of which can be factored into the proposed planting and management plan proposed by Winstone as a condition of the exchange. The matters raised regarding sourcing and monitoring can be considered in developing a planting and management plan.

In addition to the exchange improvement gains (which is not an offset), the substantive RMA application will address the loss and relocation of swamp maire arising from the development of the OBDA. A full offset package will be developed for the loss or impact arising from that development, as part of the RMA approvals, to address those effects at that point.

On the concern about sourcing suitable native species for replanting, we consider that there is a suitable source of plants available locally, that weed and pest management are offered and for a suitable period. We agree with the Wellington Conservation Board that 30-40 years is an appropriate time for Winstone's (the beneficiary of the land swap) to manage the swamp maire offered in the southern gully (DOC- Get land).

Lastly, we agree with the comment that whether the swamp maire transplantations (as part of ecological offsetting) are 5 or 9 (or 14), the attempt to transplant is, while experimental, very worth attempt and will provide useful insight into the species. Further details of that will be provided in the ecological assessment to support the resource consent application (they are not intended to be relocated as part of the exchange application).

WCB raise:

The Board believes that the proposed land-swap, should it be approved, presents considerable opportunity for longitudinal ecological research, including relating to trans-location of species, restoration efforts and changes in soil ecology over time. We recommend these opportunities be explored as part of any further mitigation and offset discussions.

Our response is:

Subject to our comments about not confusing the improvements proposed as part of the exchange and any offset required to address the impact of the proposed OBDA at the resource consent stage, we agree with the Board that the exchange does present a considerable conservation opportunity to create a large swamp maire forest. This restoration project provides an excellent opportunity for research and further learning of this species and would support measures to ensure this is provided for in the development of the planting and management plan.

WCB raise:

The Department's 5 Year Regional Strategy (updated 8 January 2026) states that DOC will take an integrated landscape approach to conservation aligned to nature, rather than administrative boundaries. The intent is to ensure all factors and perspectives are weighed and prioritised.

Supporting iwi and like-minded partners is critical to success in this context, adopting a strong partnership-based approach to mitigation efforts is vital.

Greater Wellington is in ongoing discussions with organisations who have restoration obligations under various other consent processes. In some cases, restoration efforts for mitigation purposes have been mutually agreed to be conducted with the Belmont Park. In parallel, GWRC has indicated it will be retiring some areas of the park from farming and incorporating these areas into restoration plans.

These initiatives create a significant opportunity for collaboration opportunities within the park, allowing a multi-generational perspective on ecological restoration at a landscape scale.

As part of mitigation activity should the land swap be approved, the Board believes that incorporating mitigation efforts into a multi-generational, multi-organisation restoration plan for the park would make an impactful and enduring contribution to enhancing conservation values in the area.

Our response is:

The ecological improvements that are proposed as part of the land exchange will contribute to the restoration of values in the park and its surrounds. We are unaware of the other processes underway, but agree that there may be opportunity for collaboration.

Friend of Belmont Regional Park (FOBRP) made the following points to which we respond

FOBRP raise:

The FoBRP has already provided much input to the Department of Conservation (DOC) regarding the application for a land exchange for the purpose of extending the extent and operations of Belmont Quarry. We have discovered and published much about the ecology of the area – in particular the abundance of valuable and threatened tree and plant species, and the rare, uplifted wetlands present that are vital for these species. And in the process, we have significantly re-shaped the understanding of the conservation land involved, so that it is now clear that the applicant's original dismissal of the DOC land as having "low ecological value" rested on superficial and inadequate ecological surveys that entirely missed the key values of the block.

Our response is:

Consultation with DOC has helped form the proposal. The EIANZ process does separate and focus on individual species but these are only one factor contributing to the values assessment. The assessment is an assessment of the ecological habitat and is an averaged assessment where it is a large area with a mosaic of similar assemblages such as here, and where they are not sufficiently large and different to be treated separately. Most of the exchange DOC-give is regenerating broadleaf of various ages and is not special in the ecological domain. The swamp maire in the exchange area are in the ex-farm sedimented gullies, not in the identified terrace wetland. The values however, of the wetland and swamp maire were

taken on board and the values tempered following consultation with DOC and as a comparison with the local DOC Get areas. The hot spots in value were a significant part of the reshaping of the OBDA so as not to involve loss within the exchange where those species and their current habitats values were recognised in order to ensure the exchange did not cause loss of those values.

FOBRP raise:

The POBDA is now known to contain areas of very high ecological value.

Our response is:

We disagree. Five trees in the DOC-Get is not a forest and is not a habitat, they are five relatively young, isolated trees in gullies of seral broad leaf forest. The hot spot value is the central western gully where there are 14 canopy trees with significant fruiting and seedling establishment. This area has been removed from the exchange proposal.

FOBRP raise:

The proposal would replace one large and roughly square-shaped block with three blocks that are physically disconnected, with awkward shapes, and consequently a much greater (3.6x) perimeter-to-area ratio, increased incursion of invasive species and a generally poor ecological outcome. The applicant has been made aware of this problem (Appendix C3, p8) but there is no way of mitigating it.

Our response is:

There is no real fragmentation. The north-western additions are continuous with the park vegetation north and bring better connection to the southern gully system. The Dry Creek additions add directly to the Dry Creek area, and it is only the Firth block that could be perceived to be more isolated, but it too retains strong connectivity east and north.

We do not consider that the proximity to weed populations materially changes and whatever the area, weed management is required and will be on going for the life of the quarry, but also in perpetuity in the Park (we assume) and can be managed accordingly.

During the development of the OBDA (which will be considered as part of the substantive application) while a new edge is created it simply replaces the current edge. At some stages of the OBDA process that edge is longer (1500m instead of 500m at most) but that is relatively short lived. Ultimately with the revegetation proposed over the OBDA, the new edges created are removed and the perceived fragmentation is resolved such that by year 50 the area is entirely again forested.

FOBRP raise:

At the heart of this issue is the question as to what parts of the proposed "DOC-Get" areas can justifiably be included in the comparison of conservation values. The proposed "DOC-Get" areas are summarised in Figure 1. The various parcels in the DOC-Get areas are:

- Southern Gully is the small block in the south-west corner of Fig 1. It comprises 3.94 ha of native vegetation surrounding a poorly-drained area previously used for grazing.
- Northern Gully is the roughly L-shaped block to the west of the existing quarry. The total area is 12.6 ha, of which 2.87 ha comprises established native forest, already protected by a QEII covenant, with the remainder mostly being regenerating bush. Parts of the Northern Gully area have already been subject to overburden dumping.
- The Firth Block is the yellow-shaded area to the east of the existing quarry. This comprises 9.6 ha of mixed native forest, and includes part of a pond which straddles the boundary with the POBDA block. The entire Firth Block is already conserved by QEII covenant.

Dry Creek here refers to a rectangular ring of land surrounding the old quarry site, NW of Haywards, comprising 7.94 ha of mixed exotic and regenerating native forest. Some parts have been previously used for quarrying purposes.

Our response is:

The southern gully contains wetland and stream and is valuable as potential swamp maire habitat and as a wetland – but it is continuous with the northern gully and Cottle area, making only a small part of that area open to debate as QEII. It is true however that much, but not all, of the valued mature forest is in the QEII area (especially the better tawa-kamahi area) but the valued wetland area, the hinau-kamahi forest and half of the northern mature forest as well as the mature pukatea forest and stream protection are additions and not currently in the QEII area.

FOBRP raise:

Fragmentation – the perimeter of the conservation area would increase dramatically. The current boundary with the quarry, from the western edge of Northern Gully down to the eastern intersection with Hebden Crescent is 1.45 km long. The perimeter of the proposed boundary would increase by 360%, to approximately 5.25 km. The negative consequences of this will be discussed later, along with the significance of the increased fragmentation of the conservation land.

Our response is:

See our response above regarding fragmentation.

This is an artificial argument because through the staging of the OBDA development there is rarely if ever that length of new open exposed park forest edge. There is no actual fragmentation, all the DOC-get areas remain connected to the park and all the park areas remain connected. However, there will be a new edge that for stage 1 and 2 would mean 800m instead of the current 550m. At worst this could be around 1km at the latest stages, by which time it would be beginning to be revegetated and would diminish back to where it is today.

FOBRP raise:

Ecology – when comparing the ecological values in terms of habitat, the POBDA in the current park has a wide range of values from low (pine and grass in the centre) to very high (swamp maire and ramarama populations elsewhere); the corresponding values in the Northern Gully (excluding the QEII part) are low to moderate, and quoted as high in the Southern Gully. (The FoBRP has to take this on trust from the reports, since the FoBRP has not been allowed access to the DOC-Get areas). On the whole, given the importance of established 50 to 85 year old and valuable tree species, and their associated wetlands, within the POBDA, the DoBRP considers that the proposal would result in a significant loss in ecological habitat value.

Our response is:

The values in the DOC-get areas, swamp maire aside, are better with more areas of mature forest and Ramarama and rare habitat types. It is the presence of the many decades of advanced successional development in the DOC get areas that create much of the ecological gains e.g. in the pukatea gully, the tawa-kamahi forest, hinau-kamahi forest, and the tawa forest of the fifth block. It is also the case that the north tawa also protects a valuable waterway. The inclusion of the southern gully wetland and the proposed improvement in establishing 200 new swamp maire also contributes to a net gain in conservation values for the DOC-managed land. In the round we remain of the opinion that the exchange is balanced in favour of DOC in terms of ecology.

FOBRP raise:

The birdlife values we rate as equally high in both Doc-Give and DOC-Get. We note that Table 19 in Appendix B1 (Ecological Assessment) scores the Caspian tern and shag species as being in the Firth QEII but not in the POBDA area. Similarly, Table 4 (p25) states that the acoustic recorder AR3 (Lake) was in the Firth Block, whereas in fact the pond where these species were recorded straddles the boundary of both blocks, and the acoustic recorder (AR3) was installed at the boundary fence. We also note that one of the acoustic recorders (AR4) had not been analysed by the time the Ecological report was compiled. We conclude that there would be little change to the avifauna ecological values.

To which we say:

As above, in our response to WBS on birdlife values.

FOBRP raise:

The FoBRP has already made submissions to DOC on the topic of valuable species within the POBDA, so this section will be a brief summary of those points:

Since learning of the Fast-track application in late 2024, the FoBRP has helped coordinate further ecological surveys, which have revealed the presence of valuable species within the POBDA, notably:

- 24 healthy specimens of swamp maire (*Syzygium maire*), status: threatened – national (and regionally) vulnerable
- 23 health specimens of Ramarama (*Lophomyrtus bullata*), status: threatened – nationally (and regionally) critical
- Two observations of *Comptosia rubra* and one of *Carex maorica*
- Perched inland wetland areas which support these populations, these environments are rare.

Swamp maire and ramarama are widely distributed throughout the POBDA and include trees up to 10m tall (see Fig 2). At the time of writing (February 2026) 11 of the swamp maire are fruiting (see Fig 3). The FoBRP has roped off all of these trees to protect their fragile root systems from foot traffic.

Our response is:

We note that in the OBDA there are 5 swamp maire (acknowledging the Inaturalist suggestion of 14), with 17 others being near but outside the OBDA and 14 of those outside the DOC-give area. It will be recognised in the substantive application for resource consents that adverse effects on swamp maire must be appropriately managed.

We recognize the Ramarama in the DOC-give, noting it is also present in the DOC get. The Ramarama will not be affected by the land exchange process. There will be a process as part of the OBDA development for salvaging those Ramarama, which are not all cleared at one time and that process is not reflected in the exchange but the values are present in the give and get areas. The details of which will become available through the substantive application.

Similarly the values associated with the wetland species are also retained through the application and so the exchange does not cause the loss of those values to the DOC land.

FOBRP raise:

Aerial photographs dating back to 1941 (available at <https://retrolens.co.nz/>) show streams, gullies and wetlands within the POBDA as dark, ungrazed areas. It is here that seedling and sapling remnants of the original native forest appear to have survived. So for at least 85 years, these areas have provided an ecological sanctuary for Swamp maire, Ramarama and *Coprosma rubra*. While still young in ecological terms, the ecological value of the established Swamp maire, classified as Threatened-Nationally Vulnerable under the New Zealand Threat Classification System, far outweigh proposals for new plantings which have no guarantee of success.

Our response is:

Those older photos show vegetated gullies, but this does not mean they were ungrazed. Rather they were not cleared totally and were allowed to regenerate as opposed to the dry grasslands. The photos suggest a uniform regeneration of seral scrub, not retention of old forest.

But we do agree that these gullies are more advanced and have become refugia for swamp maire and in the east wetlands.

FOBRP raise:

The FoBRP invited comment from Dr Colan Balkwill, who has recently completed a PhD around swamp maire at Victoria University of Wellington, and is familiar with many of its habitats throughout Aotearoa. Colan visited the POBDA and commented "I observed healthy swamp maire trees of various ages, at least two of which were likely original and seeded prior to land clearance. These trees are therefore not only of historical value but also harbour a snapshot of the ancestral genetic diversity of the region prior to deforestation. They therefore represent living fossils, and any seed they produce is of high value. The habitat as a whole is well suited to swamp maire and other swamp forest plants

Our response is:

The larger older trees (also observed by us), i.e. those with the greatest value as fruiting trees (related to the above statement), are not in the exchange area, but in the central western gully (where they have been roped off (14 fruiting trees).

With respect to the 5 OBDA swamp maire in the DOC-give area, these are not affected by the land exchange. And the substantive application will seek to ensure these are salvaged and offset (both) as well as securing their genetic material. Our swamp maire habitat GIS assessment based on the Victoria University research publication methods and our own field work shows that there are many small swamp maire habitats in the wider local area but which currently do not have swamp maire. The net outcome for swamp maire is a gain.

FOBRP raise:

"Greater Wellington has lost over 95% of its swampland habitat. Any remaining swamps, and the plants they contain, should therefore be considered irreplaceable, and it is hard to envisage how the proposed swap could provide land that is as ecologically valuable as the park land considered for exchange. Of specific note is the site's relative isolation from other swamp maire remnants, and its ease of access, both of which are important components of protecting these trees from myrtle rust. Isolation means reinfection is less likely, and accessibility allows monitoring and control to be more easily carried out by members of the public".

Our response is:

Wetlands and swamp maire habitat and swamp maire are not irreplaceable. Wetlands are created and swamp maire are successfully established in restoration programs. The friends of Waikanae River group have successfully established at least two areas of swamp maire, of which at least 10 are canopy height (for example). The below photograph shows one of eight along this particular created wetland edge healthy and becoming a canopy representative.



A planted swamp maire (right), one of eight along a created wetland edge and walking path left on the Waikanae River.

Wetland values in the DOC give area are balanced by a similar sized wetland in the DOC get area, which is currently still early in its regeneration, and which has proposed improvements to cause a representative wetland that will be more advanced than that lost and with 200 swamp maire.

FOBRP raise:

All of the currently known swamp Maire are publicly visible on the iNaturalist website; these are the only known swamp maire within Belmont Regional Park, and the nearest recorded population is in Stokes Valley (2.5km distant), on the other side of the Hutt Valley.

Our response is:

The issue here is that there is no comprehensive swamp maire survey over the ecological district but we acknowledge that iNaturalist reports do provide a good if unverified survey effort. The iNaturalist shows 14 Swamp maire within the DOC-Give, we assess there to be 8 plants in the DOC-Give and 5 likely to be impacted by the OBDA footprint) but regardless of the actual number the processes proposed as part of the land exchange does not remove swamp maire and rather it adds 200 new swamp maire to be established in suitable habitat in a similar area. There remains swamp maire habitat adjacent and throughout this area of the park and those areas do not currently contain swamp maire.

FOBRP raise:

This part of Belmont Regional Park is part of a Key Natural Ecosystem (KNE), and forms part of a vital ecological corridor connecting native forest fragments in the western hills of Lower Hutt.

Our response is:

The temporary removal (50 years) as a consequence of the OBDA development (not the land exchange) does not exclude or disconnect the KNE, nor does it reduce the width at the Park at that location such that the connectivity north and south is seriously jeopardized for most mobile species currently present. But it is recognized that at the point of the OBDA the width of the seral scrub regenerating vegetation in the park will reduce by 50% in the first 20 years of OBDA operation. There are other such “narrow” bands of seral vegetation south of this location which still offer connectivity and therefore so should this area.

FOBRP raise:

The proposed land exchange would remove about 23.5 ha from that KNE, but the greatest impact would be that, although the overall area of conserved land would remain roughly unchanged, the perimeter between the regional park and the quarry lands would increase by a factor of 43.61, from 1.45km to 5.25km. (That is the increase in plan distance; the actual boundary increase would be greater, given the topographic changes along it). DOC have already raised this as a significant problem (see Appendix C3, p8):

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.

Our response is:

Please see our above response regarding the fragmentation issue. The perimeter along the park and quarry (currently around 550m) will slowly increase (ie the extent of non-forest edge increases as stages progress) with the effects of stage 1, 2 being the most obvious, but these are also mitigated through revegetation first. There is no time in the process where the entire linear outer extent is cleared and would cause the extent the friends proportion to occur. At worst we estimate an additional 1200m of new quarry park interface when all of most of the stages are enacted but not all restored and that effect is temporary.

FOBRP raise:

A longer perimeter will greatly amplify the “edge-effect”, whereby the conservation values near the edges of conservation land are depleted over time through incursion of invasive weeds, pest animals, and (for example) airborne pathogens, such as myrtle rust. This effect is already pronounced and obvious along the current POBDA boundary with the quarry.

Our response is:

See above regarding the fragmentation issue. Because of the staging the vegetation is not cleared all at once and there is progressive revegetation meaning the edge effect while occurring at a different location and variably over the years is actually fairly similar to that of today. We note also that some of the “new” edge effect is not new as there is already edge with the open access way for the park north and through the central ridge of the OBDA.

FOBRP raise:

In fragmented landscapes, edge effects can dominate the entire area, leading to significant loss of habitat for species that require undisturbed interiors. A Nottingham Trent University study (March 2025) suggests that fragmented landscapes have 12.1% fewer species than unfragmented ones

<https://www.ntu.ac.uk/about-us/news/news-articles/2025/03/want-to-preserve-biodiversity-go-big.-researchers-say>).

Our response is:

This level of fragmentation will not occur, and the new edges replace the existing in magnitude, and it is a very far reach to suggest the clearance of the OBDA in the staged fashion proposed would lead to such effects in the remaining park area. The park retains its large size and is not divided or fragmented. It has, for a time, a thinner band at one location, which will be no thinner than other areas already present today and is over time refilled with native vegetation.

FOBRP raise:

Because of their QEII status, the Firth and Northern Gully established forest areas are currently part of the wildlife corridor between the regional park, the Hutt Valley and the great extent of native forest further east. Importantly, they are contiguous with the conservation KNE within the park, but the proposed land exchange and subsequent quarry activity would sever this wildlife corridor

Our response is:

There is no severing of a corridor and no actual fragmentation. The mobile species are still able to navigate through native vegetation cover in a similar way as they can now move north and south, east and west.

FOBRP raise:

We have said little about the relative values of the old Dry Creek clean-fill site, NW of the Haywards Intersection. From a recreation perspective, it is clear from Fig 5 of the Land exchange report (p21) that the area offered by the applicant gives no recreation advantage, being steep-sided bush, adjacent to retired quarry working, and off to one side (east) of all other recreational activity in the park. The exceptionally weedy nature of the old quarry side and its proximity to the proposed exchange block, along with the distance from the rest of the park, suggest that little or no ecological value would be gained from this part of the proposed exchange.

Our response is:

While we also considered the lower levels of the old Dry Creek quarry to be too weedy for inclusion in the exchange, the areas proposed for exchange do have values and values not dissimilar for fauna as the OBDA, only without swamp maire habitat. They, while weedy, have areas of good regeneration of native cover and there is a weed and pest management component to the exchange.

FOBRP raise:

After the initial discovery of 14 swamp maire within the POBDA, the applicant brought the western boundary eastwards in an attempt to mitigate the impact, ostensibly by avoiding the swamp maire. However the submitted plans (eg Fig 2.1 on p3 of the Hydrology Assessment) show the catchment upstream of these trees to be within the POBDA, and if the hydrology in this gully is modified, this grove of swamp maire could be expected to die within one or two years, as was explained in section 3 above.

Our response is:

While it is outside of our area of expertise, we understand that the OBDA cannot alter hydrology or cause discharge of material to that central western gully (especially) and that protection of the hydrology and

material entering the swamp maire gully is paramount. The effects of the development of the OBDA area are to be considered as part of the substantive application.

FOBRP raise:

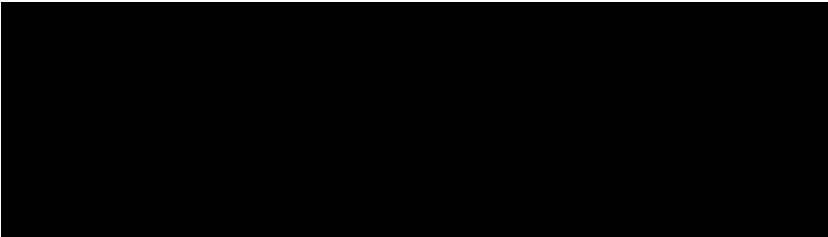
One of our key findings is that the POBDA contains irreplaceable ecosystems and threatened tree species that were not known before the application was conceived. The applicant's argument supporting net ecological gain is rooted in incomplete and unreliable data, and current knowledge shows it to be false.

Our response:

We remain of the view that the land exchange will achieve a net ecological gain.

The natural inland wetland area present on the DOC-Give is not irreplaceable; it is a relatively simple Carex-kiokio wetland with some regionally underrepresented sedge and rush taxa that is in a modified state post farm use. Wetland recreation is typically successful throughout the country, but we note that the loss of the wetland area is a substantive application offset issue, and is not an effect of the land exchange. The exchange offers the same area of wetland (southern gully) with restorative and swamp maire additions and management. Regardless of that the OBDA resource consent application has an offset developed for that wetland effect. It is possible to both recreate native assemblage wetland and cause swamp maire to be propagated in new areas (see Friends of Waikanae River example above).

Dr Vaughan Keesing, Dr Leigh Bull
Ecologists



05.03.2026
BlueGreen Ecology Ltd.

Addendum to

“Belmont Quarry – Hydrological analysis of proposed land exchange”

I am the author of the above report and have the qualifications and experience set out in the introduction of that report. I have been provided with comments received on the Belmont Land Exchange Application and have been asked to respond to those within my area of expertise. I confirm that I have adhered to the Environment Court’s Code of Practice for expert witnesses when preparing these comments.

Context

Planning relating to the future of Belmont Quarry consists of two separate, although potentially interrelated, projects. The first is simply a potential land exchange. Should the exchange be agreed, then planning for, and construction of, an Overburden Disposal Area (OBDA) might be progressed by Winstones Aggregates. While the construction of an OBDA is contingent upon the land exchange, the design and construction of the OBDA would be subject to different rules and planning framework to the land exchange. The development of an OBDA needs to be considered separately from the land exchange.

The detailed hydrological analysis provided in “*Belmont Quarry – Hydrological analysis of proposed land exchange*” dated 3 December 2025 (**Hydrology Report**) focused specifically on the hydrological attributes, likely flow regimes, and characteristics of all the areas considered as part of the land exchange. It deliberately did not address the hydrological implications and effects of any potential OBDA. That analysis will be subject to a separate planning application.

The comments within this Addendum therefore relate mainly to the hydrological attributes of the various areas considered as part of the land exchange. It should be noted that the land exchange will have no effect on the existing hydrological processes, characteristics, or flow regimes of the various drainage lines within any of the potential exchange areas. All the hydrological processes will continue to operate and function, in the same manner and scale, as they do at present. At this stage, it is only a change in land ownership and status that is proposed.

Introduction

As detailed in the Hydrology Report, the various areas proposed for the land exchange are located on the uplifted block immediately west of the Wellington Fault scarp. What is referred to as the ‘OBDA’, is the land parcel located primarily on the interfluvies between six small headwater gullies. The relatively flat slopes on the ridges of this area contrast with the steeply incised small watercourses, and numerous headwater gullies, eroded into the uplifted block. The small catchments, particularly in the headwater gullies, mean that any surface flow is highly variable, both in space and over time. While the lower reaches of the larger streams have perennial flow, the continuity of surface flow (in both time and space) decreases moving upslope, with flow becoming first intermittent and then largely ephemeral¹. It should be noted, however, that the boundaries between these different ‘theoretical’ flow regimes vary over time in response to rainfall and antecedent conditions. Therefore, providing a robust definition of the exact nature of the flow regime at a particular location can be problematic, even when applying current guidance¹.

¹ Watercourse categorisation guidance document, GWRC, May 2021.

Drainage mapping process

The areas considered under the land exchange have a combined area of ~57.3ha. It is impossible to traverse all the various watercourses and drainage lines contained within this area. Therefore, robust modelling of the drainage network, supported by field validation, was undertaken. This is the only way to provide a complete, consistent, and holistic assessment of the hydrological attributes of the various areas.

The method adopted applied a consistent, industry-standard, methodology across all areas. All drainage lines were characterised by their catchment area, topographic form, and number of upstream tributaries. Given the close proximity of these areas, and similarity of geology, climate, topography, and general vegetation, the same rainfall-runoff relationship exists across all exchange areas.

The hydrological modelling therefore provides an accurate quantification of the number, length and size of the various watercourses and drainage lines throughout all areas. It should be noted that the modelling was based on the physical attributes of the landscape and not any arbitrary division of drainage lines and watercourses into perennial, intermittent, or ephemeral reaches. Consequently, in my expert opinion, the comparison provided in the Hydrology Report is both accurate and robust.

The results from the hydrological modelling are summarised in Table 5.2 from the Hydrology Report (*Table 1 of this addendum, below*).

Table 1: Comparison of stream channel metrics for the different land parcels considered within the exchange.

Land exchange parcel	Area (ha)	Longest stream in exchange area (m)	Stream length less than Strahler order 7	Stream length Strahler orders 7&8	Stream length greater than Strahler order 9	Total stream length in exchange area (m)	Upstream contributing catchment area (ha)
OBDA parcel	23.24	265	899	723	223	1,855	89.2
Winstone parcels	34.1	463	449	898	1,682	3,029	177.4

It is significant that, even excluding all areas currently under QEII covenants, the Friends of Belmont Regional Park (FoBRP) conclude that the proposed land exchange would see an increase in 'Stream Length' within Belmont Regional Park of 17% (*Table 2 of this addendum, below*). This is consistent with the findings presented in the Hydrology Report.

Table 2: Summary of the net effect of the proposed land exchanges, excluding land under existing QEII covenants, provided by FoBRP.

Discipline	Doc-Give	Doc-Get excl QEII	Net Gain
Area	23.24 ha	21.6 ha	Loss
Fragmentation	Very low	Very high	Significant loss
Ecology (Habitat)	Low-very high	Low-moderate	Significant loss
Ecology (Birds)	High (incl pond life)	High	Unchanged
Ecology (Bats)	Nil	Nil	Unchanged
Ecology (Lizards)	Proportional to area	Proportional to area	Loss
Landscape	Moderate	Moderate	Unchanged
Recreation	Moderate (with potential)	Low (disjoint and remote)	Significant loss
Archaeology	Very low	Very low	Unchanged
Aquatic	1845 m of stream	2164 m of stream	Yes, by 17%
Wetland	High	High	Unchanged

Consequently, there is no dispute that the land exchange would result in a net increase in the length of streams and associated aquatic ecosystem protected within Belmont Regional Park. The land exchange will not result in any changes to the hydrological processes or flow regimes that are operating in any of these areas currently i.e., there will be no change to the existing hydrology. The existing rainfall-runoff relationships, and patterns and characteristics of drainage will be retained under any land exchange.

Perennial streams

As stated, defining the inferred flow regime (i.e., perennial, intermittent or ephemeral) of a drainage line is problematic, even when applying current guidance¹. Despite this, there are perennial streams (i.e., those with continuous temporal and lateral continuity of flow) within the OBDA exchange area. The reaches of the drainage network with perennial flow were marked on Figure 2.1 in the Hydrology Report (*Figure 1 of this addendum, below*).

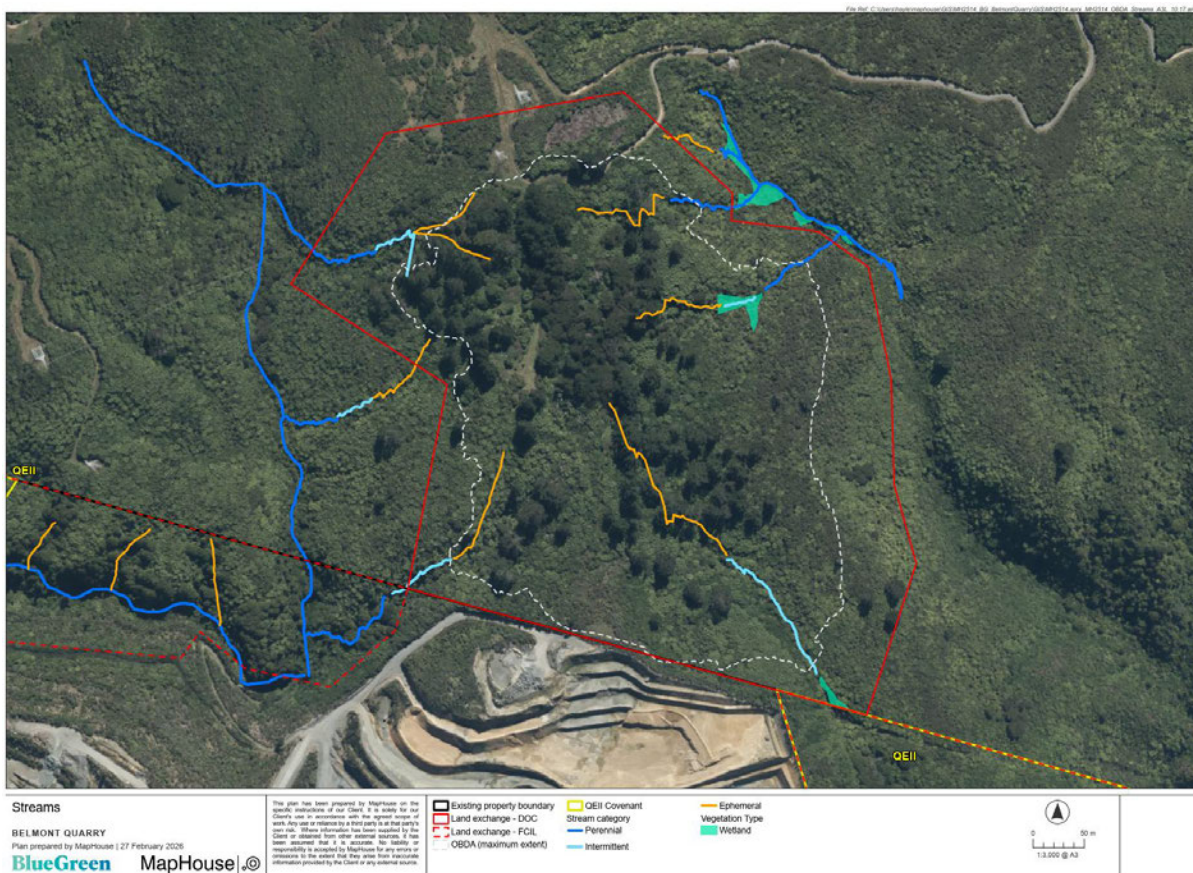


Figure 1: Figure 2.1 from the Hydrology Report updated to show the land exchange boundary and a potential OBDA, the design and construction of which will be addressed in a subsequent application.

Excess precipitation can move as surface and/or subsurface flow depending on antecedent conditions, the properties of the regolith, catchment size, and the intensity and duration of rainfall. A key hydrological characteristic of the watercourses in the exchange areas is therefore whether there is continuous surface flow. Hydrologically, the more significant watercourses are those with perennial or intermittent flow. Both perennial and intermittent watercourses are managed in the same manner, as rivers, under the Natural Resources Plan. Because of this, any distinction between these two types of watercourse assumes less significance. The hydrological values of watercourses with ephemeral flow will vary with flow conditions as discussed above.

While there are guidance documents, the assessment of the type of flow regime is often subjective, particularly in small gully heads. This is because the amount of water on the slope depends on rainfall, antecedent conditions, and the volume and characteristics of the regolith² ('sponge') which can hold, and then release, excess rainfall.

During any rainfall event, the regolith absorbs rainfall. When the regolith is saturated, from either direct rainfall or subsurface percolation, water will flow over the ground surface. If the regolith is not saturated, any flow will be subsurface until either the regolith thins (so it saturates), there is additional rainfall, or there is inflow of water from other areas at which point the regolith will saturate and surface flow will commence.

Headwater gullies are characterised by highly variable flow, both surface and subsurface, and the higher in the catchment the more variable the flow. Surface flow therefore varies both temporally and spatially. For example, with high antecedent moisture and higher rainfall, surface flow will be greater and more extensive. During periods with little or no rainfall, surface flow may cease, although subsurface flow will continue. It is also possible that, depending on the nature of the regolith, topography, and moisture conditions that surface flow will be intermittent down a drainage line, with water flowing over the surface in some reaches while being entirely subsurface in adjacent reaches. Short lengths of disconnected surface flow do not mean that flow in a stream should be considered perennial.

Specific responses

Most of the comments provided by the FoBRP relate to the potential effects of establishing an OBDA within the proposed exchange area currently within Belmont Regional Park. These comments have limited relevance with respect to the impact of the proposed land exchange on the hydrology of the different areas. This is because ownership of the land will have no effect on the hydrological processes. These will continue to operate as they do at present. The existing rainfall-runoff relationships, and patterns and characteristics of drainage will be retained irrespective of any change in land ownership.

Only if there is a significant land use change, is there any potential for the existing hydrological processes to be affected.

Therefore, while not of direct relevance to the proposed land exchange, responses to the FoBRP submission relating to hydrology and hydrological processes are provided below.

FoBRP comment 17

The Hydrology assessment (Appendix B9) significantly underestimates the streams in the POBDA, and states that it contains no perennial streams, concluding that the proposed dumping of overburden would not affect the drainage characteristics of the area. In fact the POBDA contains streams that have never been seen to dry up in the last 20+ years, and the wetland ecology of the area would be destroyed.

As described above, and detailed in the Hydrology Report, robust modelling of the drainage networks within all parcels considered for the land exchange, supported by field validation, was undertaken.

² The unconsolidated, generally more porous and permeable material, overlying the bedrock.

This is the only way to provide a complete, consistent, and holistic assessment of the hydrological attributes of the 57.3ha being considered as part of the land exchange.

The method adopted applied a consistent, industry-standard, methodology across all areas. All drainage lines were characterised by their catchment area, topographic form, and number of upstream tributaries. Given the proximity of the areas, and similarity of geology, climate, topography, and general vegetation, the same rainfall-runoff relationship exists across all the exchange areas.

The hydrological modelling therefore provides an accurate quantification of the number, length and size of the various watercourses and drainage lines throughout all areas. It should be noted that the modelling was based on the physical attributes of the landscape and not any arbitrary division of drainage lines and watercourses into perennial, intermittent, or ephemeral reaches. Consequently, in my expert opinion, the comparison is both accurate and robust.

The Hydrology Report does not state that there are no perennial streams within the OBDA exchange area. Various reaches of the watercourses with perennial flow are mapped and shown in **Figure 1** above.

Any land use change, and potentially the design and construction of an OBDA, are beyond the scope when considering just the land exchange. However, should an OBDA be constructed the existing Cottle's OBDA provides a real example of what can be achieved. It has been shown at the Cottle's OBDA that it is possible to maintain both surface and subsurface flow, the existing flow regime, and existing water quality using a range of industry standard techniques. The design and construction of any new OBDA will ensure that the existing hydrological processes are maintained, including both surface and subsurface flow. The current discharge into each of the various drainage lines within the OBDA will continue. It is therefore incorrect to suggest that the wetland ecology of the area down-gradient would be destroyed.

As shown in **Figure 1**, a significant buffer is proposed between any OBDA and the boundary of the exchange area. It is my expert opinion that it is possible to design an OBDA, with its associated drainage and sediment control, so that any effects on hydrological processes are less than minor at the boundary of the exchange area. There will be no measurable adverse effects on hydrology or hydrological processes beyond the boundary of the exchange area. The OBDA will not affect any wetlands or the flow regimes of any streams down-gradient of the OBDA.

FoBRP comment 38

In late 2025 the applicant revised the POBDA western boundary to exclude one population of swamp maire. The FoBRP regards this as a welcome but token adjustment since (see Fig 2.1 on p3 of the Hydrology Assessment) the watercourse upstream of the "excluded" swamp maire would still be buried in overburden. As J T Salmon points out (on p168 Native Trees of New Zealand): "if the swamp or bog is drained, the tree dies within one or two years". Regardless of the western boundary adjustment, the largest wetland and associated flora (upstream of the pond, in the south-east) would still be destroyed by the proposed overburden disposal.

The only wetland that will be adversely affected by the development of an OBDA is that located within the OBDA (**Figure 1**). As explained above, by applying the hydrological principles and practices from the existing Cottle's OBDA, the hydrology of the remaining wetlands will be unaffected by the development. The operation of the existing Cottle's OBDA proves that existing hydrological

processes can be maintained down-gradient of an OBDA. Consequently, there is no uncertainty or risk to the existing hydrological processes from developing a new OBDA in the exchange area.

FoBRP comment 70

The Hydrology assessment can be found in Appendix B9. It claims that the POBDA area only contains intermittent and ephemeral streams, ie, that there are no streams that flow continuously. This seems to be based to a large extent on what is depicted on the LINZ topographical maps, and Strahler stream order in combination with a digital terrain mode, rather than by repeated field observations. LINZ topographical maps are known to show watercourses where none exist (eg on karst landforms) and they are not intended to provide a reliable source of hydrological information.

This is incorrect as discussed in both the Hydrology Report and this addendum. The mapping of watercourses and drainage lines has used consistent, robust, industry-standard tools. Comparison of the hydrological attributes of the various exchange areas is therefore robust and accurate. Perennial streams have been mapped in the OBDA (**Figure 1**). The hydrological assessment was not reliant on what is shown on LINZ topographical maps.

The reference to karst landforms is irrelevant. There is no limestone or marble in the area and consequently no karst landforms or karst hydrology. The bedrock in this area is relatively impermeable greywacke, with generally thin overlying regolith. Consequently runoff, and particularly the erosion of drainage lines, is dominated by surface processes. The illustration of 'streams' on LINZ topographical maps is consistent but constrained by the scale of the maps and the technology available when the maps were drawn. Irrespective of this, the identification of drainage lines in the Hydrology Report, and reaches of streams with perennial flow, did not rely on the LINZ topographical maps. The identification and mapping of drainage lines is discussed in more detail in the Hydrology Report.

FoBRP comment 71

*Consequently the Hydrology assessment significantly undervalues the importance of the stream courses within the POBDA. In particular (p8) "The [LINZ's topographical map] shows no streams in this area (Figure 2.5). Consequently, there is likely to be only limited surface flow in the proposed OBDA. The existing rainfall-runoff relationships, and patterns and characteristics of drainage, will be retained during any land exchange". This is simply incorrect: members of FoBRP have been visiting the area over the past 20 years and have never seen a lack of flow in the stream that feeds the wetland supporting swamp maire and ramarama, upstream of the pond. These observations over a long period of time are unique to community members, and not something a desktop survey could hope to capture. **Perennial streams definitely exist within the POBDA, and they must be accounted for in the application.***

There are some watercourses with perennial flow within the OBDA exchange area and these were marked on **Figure 1**. The nature and characteristics of streamflow generation, including both surface and subsurface flows, are discussed in detail above and in the Hydrology Report.

As stated above, a land exchange is simply a change of ownership. Therefore, as stated "The existing rainfall-runoff relationships, and patterns and characteristics of drainage, will be retained during any land exchange". Changing ownership will have no effect on the pattern of rainfall, the existing rainfall-runoff relationship, or the hydrological environment. If these attributes do not

change, there will be no changes to hydrology. In my opinion, it is important to separate the potential hydrological effects of the land exchange from those that might result from subsequent land use decisions. The effects of those decisions will be identified, controlled, and managed through a separate process.

Despite the above, it is my opinion that an OBDA could be developed within the exchange area that maintains, and potentially enhances, the hydrological environment downstream of the OBDA. The design, construction and management of the existing Cottle's OBDA provides working example of how this could be achieved.

FoBRP comment 72

This is illustrated in Figure 2.5 (p8 of Appendix B9): A dashed red region is used to vaguely indicate the area of "the proposed OBDA and the lack of any streams shown in this area". The lack of care and attention in this assessment is, frankly, appalling.

The detailed and comprehensive mapping of watercourses and drainage lines is discussed in detail above and in the Hydrology Report. No reliance was placed on Figure 2.5 when identifying the streams and watercourses in the area. That drainage network analysis was done using high-resolution topographic data and a range of hydrological analysis tools which are considered 'industry standard'.

FoBRP comment 73

This point is important, because this stream feeds not only a rare, uplifted wetland, but also flows into the Firth block, immediately downstream. Burial of this stream, and consequent addition of fines and soil particulates into it, would adversely affect the QEII protected lands downstream. This would presumably contravene the terms of the Firth Block QEII covenant.

The infilling of a gully does not need to stop all runoff and hydrological processes. Any rainfall over the area, in excess of evapotranspiration requirements, will still runoff either over the surface or via subsurface drainage. As shown at the Cottle's OBDA, it is possible to control subsurface drainage to maintain existing flow paths, to separate clean and dirty surface flow, to discharge clean water into original flow paths, and to treat dirty water to avoid the discharge of sediment. Consequently, the concern expressed by the FoBRP can be avoided through standard industry practices and local experience that have been shown to be effective at maintaining hydrological processes and the existing flow regime.

It is also not correct to refer to an "uplifted wetland" as if it is a distinctive landform. The wetland is simply an area of impeded drainage within a topographic depression that just happens to be above the Wellington Fault scarp. The wetland formed subsequent to uplift of the scarp and so cannot be described as an "uplifted wetland". Had the wetland been present prior to uplift, it is my expert opinion that this area would have drained and therefore ceased to function as a wetland.

Any land use change, and potentially the design and construction of an OBDA, are beyond the scope when considering the land exchange. However, should an OBDA be constructed the existing Cottle's OBDA provides a real model as to what can be achieved. It has been shown at Cottle's that it is possible to maintain both surface and subsurface flow, the existing flow regime, and existing water quality. Since the existing hydrological processes will be maintained within any OBDA, including both surface and subsurface flow, and the current discharge into each of the various

drainage lines within the OBDA will continue, it is not correct to suggest that the wetland ecology of the area would be destroyed. That said, any hydrological changes associated with constructing an OBDA will be managed to ensure they do not adversely affect the wetlands or their ecological values.

FoBRP comment 76

After the initial discovery of 14 swamp maire within the POBDA, the applicant brought the western boundary eastwards in an attempt to mitigate the impact, ostensibly by avoiding the swamp maire. However the submitted plans (eg Fig 2.1 on p3 of the Hydrology Assessment) show the catchment upstream of these trees to be within the POBDA, and if the hydrology in this gully is modified, this grove of swamp maire could be expected to die within one or two years, as was explained in section 3 above.

Any land use change, and potentially the design and construction of an OBDA, are beyond the scope when considering the land exchange. However, as stated above, should an OBDA be constructed, the existing Cottle's OBDA provides a real model as to what can be achieved. It has been shown at Cottle's that it is possible to maintain both surface and subsurface flow, the existing flow regime, and existing water quality. Since the existing hydrological processes will be maintained within any OBDA, including both surface and subsurface flow, and the current discharge into each of the various drainage lines within the OBDA will continue, it is not correct to suggest that the wetland ecology of the area would be destroyed. Any hydrological changes associated with constructing an OBDA will be managed to ensure they do not adversely affect the wetlands or their ecological values.



Addendum

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Attention: Jade Wikaira

Company: c/- Winstone Aggregates

Date: 3 March 2026

From: Rhys Girvan (Registered Landscape Architect)

Message Ref: Belmont Land Exchange

Project No: W15069

This addendum should be read in conjunction with the Landscape Assessment supporting the proposed land exchange, dated 1 December 2025. The purpose of this addendum is to respond to comments received from the following parties in relation to landscape and visual matters which relate to the proposed Belmont Quarry Overburden: Land Exchange:

- Friends of Belmont Regional Park
- New Zealand Conservation Authority
- Wellington Conservation Board

This addendum was prepared by Rhys Girvan, Senior Principal Landscape Planner and primary author of the Landscape Assessment. This addendum has been prepared in accordance with the Environment Court Practice Note 2023 (Code of Conduct for Expert Witnesses) and complied with that Code. A Curriculum Vitae of the primary author is included in the previous Landscape Assessment. Detailed matters relating to ecology, recreation, planning and cultural values are addressed in other respective technical reports.

Comment Received	Landscape Response
Friends of Belmont Regional Park	
<i>“Reason IV: The proposed application would severely fragment the park</i> <i>The proposal would replace one large and roughly square-shaped block with three blocks that are physically disconnected, with awkward shapes, and consequently a much greater (3.6x) perimeter-to-area ratio, incursion of invasive species and a generally poor ecological outcome. The applicant has been made aware this problem (Appendix C3, pB) but there is no way of mitigating it.”¹</i>	From a landscape perspective, the DOC-get land is not a series of isolated fragments. It includes part of the former Dry Creek Quarry and three contiguous vegetated areas (Northern Gully, Southern Gully and Firth Block) that adjoin Belmont Regional Park and straddle the existing quarry boundary. These parcels align with legible gully and spur landforms on the Western Escarpment and, because they include land that is more prominent in wider views, their inclusion within the Conservation Estate strengthens the continuity and integrity of a coherent vegetated

¹ Friends of Belmont Regional Park, page 4

	escarpment backdrop. By comparison, the proposed OBDA area forms an internal edge location immediately adjacent to the established quarry within a transitional and already modified setting. Concerns about perimeter-to-area ratios, weed incursion and ecological fragmentation are primarily ecological matters and are addressed through the ecological assessment and proposed management measures. Notwithstanding this, the landscape assessment has considered coherence and capacity at the broader landscape character area scale and concludes the exchange would strengthen the conservation estate's landscape and visual fabric while continuing to consolidate potential quarry-related disturbance within a relatively contained area of landscape.
<i>"The confusion over whether QEII lands can be considered is also apparent in the Land-exchange report. In relation to landscape benefits, on p65, it states:</i> <i>9.61 There is also a net benefit in landscape values in favour of the conservation estate. From a conservation perspective, areas with higher landscape values are more valuable because they are more sensitive to change and require greater protection to prevent visual impacts arising from their reduced capacity to withstand development [our emphasis]"²</i>	The landscape assessment compares the underlying landscape values (physical, perceptual and associative attributes) of the land proposed to be exchanged. This evaluation is independent of the particular protection mechanism currently applying to parts of that land (for example, a QEII covenant). QEII covenant status is relevant context because it can indicate recognised values and existing stewardship, but the assessment's conclusions are driven by the comparative landscape value, visibility, sensitivity and capacity of the exchange areas. If the exchange proceeds, the acquired land would be managed within the relevant conservation and/or reserve framework. Any administrative changes to covenant status do not alter the landscape attributes that have been evaluated.
<i>"In terms of the impact on the existing recreation routes outside the POBDA, obviously the quarrying activities would create significant noise, visual pollution and dust. 40% of the Buchanan Road tramping track would have line of sight and spoiled views as a result of the proposal (Fig 5).</i> <i>Policy 3.3.2.5 of The Wellington Conservation Management Strategy (CMS) 2019 states the need to:</i> <i>Avoid, or otherwise minimise, adverse effects on the qualities of peace and natural quiet, solitude and remoteness in places where this is an important feature and expectation of the visitor experience.</i>	It is important to distinguish between the land exchange itself (a change of tenure) and any subsequent substantive application to develop and operate an overburden disposal area. The land exchange does not, of itself, create physical change, noise, dust or other operational effects. Potential effects on recreation experience (including peace and natural quiet) from future quarry/OBDA operations will be assessed as part of the substantive application, alongside relevant operational controls and mitigation (for example, setbacks, buffers, staging and rehabilitation). Regarding visibility, the DOC -give land was assessed via the ZTV mapping provides theoretical visibility based on bare-ground topography to inform my assessment of landscape values. This was checked against field observations, which confirm that existing landform and established / regenerating

² Ibid, pages 7 and 8

<i>Clearly, the proposed land exchange and consequent quarrying operations would contravene this guideline.”³</i>	vegetation provide substantial local screening. From Buchanans Road Tramping Track, visibility of the DOC-get land is assessed as partial and generally short-duration, with the track increasingly enclosed by vegetation through this part of the park.
New Zealand Conservation Authority	
<i>“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.”⁴</i>	While the DOC-get land is not a single cadastral block, it comprises three contiguous vegetated parcels (Northern Gully, Southern Gully and Firth Block) plus part of the former Dry Creek Quarry, each of which adjoins Conservation land, (Belmont Regional Park). From a landscape perspective, the key outcome is that the exchange consolidates the management of prominent vegetated spurs and gullies along the Western Escarpment that form an important backdrop to views from the Hutt Valley. Where parts of this land are already subject to mechanisms such as QEII covenanting, transfer into the Conservation Estate still provides value by bringing these areas under a single, enduring land manager, enabling consistent escarpment-wide stewardship (e.g., weeds/pests, track/access management, and coordinated restoration), and reducing fragmentation and reliance on future private-owner decisions. This provides greater certainty that the existing character and backdrop values will be maintained and enhanced over time. The adjacency of some parcels to rural-residential properties reflects an existing edge condition. Bringing these vegetated areas into the Conservation Estate can further reinforce a stable vegetated interface between residential areas and existing quarry activity and support consistent management of the escarpment backdrop. The DOC-give land proposed to be transferred to Winstone is immediately adjacent to the existing quarry and has been assessed as having moderate landscape value with relatively contained visibility in the broader landscape setting.
Wellington Conservation Board	
<i>The Board notes that a detailed ecological assessment report (“Belmont Quarry Land Exchange: Overview of Ecological Values”, BlueGreen Ecology Ltd) has been prepared to support the application. The report identifies ecological values within both the proposed exchange areas and the overburden disposal site,</i>	The landscape assessment has already considered the exchange at a landscape character area scale (Belmont Hills and Western Escarpment) and treats landscape as a connected, integrated environment where changes in one area can influence wider patterns, views and the sense of openness / enclosure. In this context, the exchange results in a slight increase in visible land and waterways along the

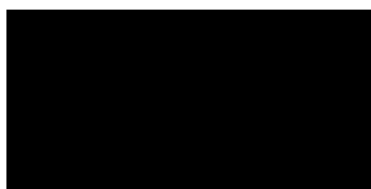
³ Ibid, pages 12 and 13

⁴ New Zealand Conservation Authority, page 5.

<i>and outlines proposed mitigation and restoration measures.</i> <i>While acknowledging this assessment, the Board believes that several broader issues have not been adequately addressed. We believe that landscape-scale ecology within the park, and surrounding catchment, would be helpful in considering the overall conservation impact of the proposal.</i>	Western Escarpment to be incorporated within the Conservation Estate, strengthening the continuity of vegetated gully and spur systems. Landscape-scale ecology matters are principally addressed through the ecological assessment. However, the land exchange also creates practical opportunities to deliver integrated landscape and ecological outcomes (for example, riparian and wetland restoration, weed and pest management, and managed recreation access) across the exchanged parcels to ensure the anticipated conservation benefits are realised.
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Based on the above, no material change in landscape values have been identified which are assessed as representing a net landscape gain based on the proposed land exchange. The findings of my original Landscape Assessment, dated 1 December 2025, therefore remain valid.

Yours sincerely
BOFFA MISKELL LTD



Rhys Girvan
 Senior Principal: Landscape Planner

Memo

TO Amy Robinson, Department of Conservation

CC [name]

FROM Jade Wikaia, Wikaia Consulting
Charlie Hopkins, Wikaia Consulting (Contractor)

CC Shalini Sanjeshni, Winstone Aggregates; Phernne Tancock

DATE 5 March 2026

TOPIC Belmont Land Exchange Application – Response to Comments

1 Introduction

- 1.1 This report was prepared by Wikaia Consulting, with input from Derive Consulting.
Jade Wikaia
- 1.2 My name is Jade Te Awhina Wikaia. I am the Managing Director at Wikaia Consulting Limited.
- 1.3 I prepared the Land Exchange Report (Report) on behalf of Winstone Aggregates (Winstone) for the Belmont Quarry Development project that was lodged with the Department of Conservation on 8 December 2025. My role was also to provide planning and iwi engagement expertise in relation to the land exchange application.
- 1.4 I have the following qualifications:
- a) I hold a Bachelor of Planning from the University of Auckland and a Master of Business Administration from the University of Wellington.
 - b) I am an accredited hearings commissioner.
- 1.5 I have 20 years of policy and planning experience working in local and central government and consultancies.
- 1.6 This memorandum responds to comments received from invited persons and groups in relation to the Belmont land exchange application lodged under Fast-track Approvals Act 2024. This response is confined to the land exchange application only.
Charlie Hopkins
- 1.7 My name is Charlie Hopkins. I am the Managing Director at Derive Consulting Group Limited.
- 1.8 I prepared parts of the Land Exchange Report (Report) in collaboration with Wikaia Consulting, which was subsequently used by Winstone Aggregates (Winstone) and filed with the Department of Conservation. My role was also to provide strategy, drafting, peer review, and proof reading in relation to the land exchange application.

- 1.9 I have the following qualifications:
- I hold a Bachelor of Science from the Victoria University of Wellington and a Master of Resource Management from Massey University.
 - I am an active member of RMLA.
- 1.10 I have 12+ years of consenting and environmental experience working in local government and consultancies.
- 1.11 This memorandum responds to comments received from invited persons and groups in relation to the Belmont land exchange application lodged under Fast-track Approvals Act 2024. This response is confined to the land exchange application only.
- 1.12 This memorandum has been prepared in accordance with the Environment Court Practice Note 2023 (Code of Conduct for Expert Witnesses). The authors confirm they agree to comply with that Code.

2 Comments

- 2.1 Comments were received from the following persons and groups:

Referred to in s53(2) of the FTAA 2024	Comments received
53(2)(a)	Greater Wellington Regional Council (GWRC), Hutt City Council
53(2)(b)	Taranaki Whānui ki te Upoko o Te Ika, Ngāti Toa Rangatira
53(2)(h)	
53(2)(i)	Queen Elizabeth the Second National Trust (QEII)
53(2)(j)	Minister for Infrastructure
53(2)(k)	Heritage New Zealand – Pouhere Taonga
53(2)(l)	GWRC, New Zealand Transport Agency
Listed in clause 25 of schedule 6	New Zealand Conservation Authority (NZCA), Wellington Conservation Board
	Friends of Belmont Regional Park, QEII, Transpower New Zealand Limited, Firth Masonry, Fulton Hogan.
Section 53(3)	Wellington Botanical Society

3 Response to comments

GWRC

- 3.1 The GWRC provided correspondence with five attachments:

Attachment	Summary
Email from David Boone – 17 October 2025	Email to FastTrackApplicationEnquiries providing attached information relevant to the upcoming Fast Track application from Winstone Aggregates to expand the Belmont Quarry.
Advice to Delivery on Winstone's Belmont Quarry Land swap proposal October 2025	Memo to David Boone 7 October 2025: Information pack to support decision making with a summary of terrestrial and freshwater information held by GWRC in relation to the land exchange areas: Attachment 1 – information provided to GWRC from FoBRP (Friends of Belmont Regional Park).

	Attachment 2 – Land exchange information summary table.
Attachment 1A	18 September 2025 email to Jack Mace from Friends of Belmont Regional Park.
Attachment 1B	18 September 2025 correspondence to Rachael Mora, Department of Conservation from the Wellington Botanical Society.
Attachment 1C	2 October 2025 correspondence from Dr Colan Balkwill.

- 3.2 This correspondence was received by Winstone from GWRC in October 2025. The matters raised were discussed through pre-lodgement consultation meetings with GWRC and informed the development of the land exchange application. These matters have already been addressed in the technical assessments filed in support of the application.

Hutt City Council

- 3.3 Hutt City Council note a neutral position on the proposed land exchange proposal.
- 3.4 No further response is required beyond what is already stated in the Land Exchange Application (Wikaira, 2025).

Taranaki Whānui ki Te Upoko o Te Ika

- 3.5 Taranaki Whānui noted *comprehensive* engagement on the proposed land exchange. The issues raised by Taranaki Whānui are captured in the Cultural Values Assessment (Appendix B7) and the associated improvements package (section 10 of the Report) prepared for the application.
- 3.6 No further response is required beyond what is already stated in the Land Exchange Application (Wikaira, 2025).

Ngāti Toa Rangatira

- 3.7 Ngāti Toa Rangatira maintain a neutral position on the proposed land exchange. The matters raised included overall conservation benefit, independent ecological assurance, loss and vulnerability of swamp forest and protection of water bodies and associated species.
- 3.8 The regional scarcity and vulnerability of swamp forest, including swamp maire, were discussed during the site visit and consultation with Ngāti Toa, noted in Appendix C of the application. Matters relating to the protection of water bodies and associated species including sediment control, water flow management, and monitoring frameworks will be addressed as part of the substantive application for RMA and wildlife approvals. Similar feedback had been provided to Winstone as part of pre-lodgement consultation.

- 3.9 An email was received from Luke Wysocki of [REDACTED]. Comments were directed to the Department of Conservation as future owner about future land use of the Southern Gully. There were no issues raised in relation to the land exchange application. No further response is required.

QEII National Trust

- 3.10 QEII maintains a neutral position regarding the Belmont Quarry Development and repeats its position given in consultation i.e. that land use cannot be inconsistent with the open space covenant. These matters have been adequately canvassed with QEII National Trust in pre-lodgement consultation. The application contains confirmation from DOC that it is accepting of the QEII Covenant without changes (See Wikaira (2025) at [12.7]).

Transpower

- 3.11 I have no additional comments in response to the Transpower letter (24/02/2026) beyond what is already stated in the Land Exchange Application (Wikaira, 2025:C1 at [5.14]), that letter reflects the pre-lodgement engagement undertaken between the parties.

Minister for Infrastructure

- 3.12 Letter received from Hon Bishop noting projects like Belmont Quarry Development are critical for economic growth of New Zealand, this is consistent with Winstone's assessment of the significance of the exchange, set out in the economic assessment. There were no issues raised in relation to the land exchange application. No further response is required.

Heritage New Zealand – Pouhere Taonga (HNZPT)

- 3.13 HNZPT noted the land exchange proposal does not intend to modify or destroy any archaeological sites and therefore the Heritage New Zealand Pouhere Taonga Act 2014 is not triggered by the exchange proposal.
- 3.14 HNZPT noted the land exchange will enable the next stage of the Belmont Quarry Development Project that will involve earthworks that may modify or destroy an archaeological site(s) and anticipate an archaeological authority application will be required in the next stage. These issues relate to the substantive application and will be progressed at that stage.
- 3.15 No further response is required beyond what is already stated in the Land Exchange Application (Wikaira, 2025).

New Zealand Transport Agency (NZTA)

- 3.16 The New Zealand Transport Agency Waka Kotahi provided comment on the proposed land exchange. NZTA's comments repeat its pre-lodgement consultation with Winstone (which is addressed at [6.15] in Wikaira (2025:C1) as well as Appendix D18 of the Application Package.
- 3.17 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. GWRC has proposed a new site outside of the land exchange area which has been agreed to in principle by NZTA. NZTA is now seeking internal sign off, and approval from HCC and UHCC, that this alternative location complies with offset planting requirements.
- 3.18 NZTA has confirmed that NZTA's only interest in the land exchange is the proposed offset area, and as described above, and its intention is to actively work to secure a new location

outside of the land subject to the land exchange, to fulfil our obligation for completing the offset planting. When NZTA obtains the relevant approvals, it will have no further interest in the land exchange.

- 3.19 Winstone has engaged with UHCC, LHCC, GWRC, and NZTA to find a satisfactory outcome for all parties.
- 3.20 The comment from NZTA (copied above), is consistent with the consultation summary in Wikaia (2025: C1, C2). Ongoing consultation with NZTA has confirmed that Agency staff have prepared an alternative management plan and are working through the approvals process of that plan becoming operative. At the time of writing this memo, an Outline Plan of Works has not been filed at Hutt City, but we understand the Agency intends to do so

New Zealand Conservation Authority (NZCA)

- 3.21 The NZ Conservation Authority provided comment on the proposal, which is undated but was received in February 2026.
- 3.22 The NZCA considers that the proposal will not result in a net benefit for conservation as required by the Act.

Paragraph 13: “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.”

Response

- 3.23 Winstone has undertaken comprehensive engagement and consultation with Taranaki Whānui ki te Upoko o Te Ika, Ngāti Toa Rangatira, Te Āti Awa Nui Tonu, Rangitāne Tū Mai Ra, and Muaūpoko in relation to the proposed land exchange.
- 3.24 The outcomes of that engagement are reflected in the Cultural Values Assessment at Appendix B7 and summarised in the Consultation Record and Consultation Summary at Appendix C. Assurance can be provided to NZCA that Winstone did consult closely with those parties pre-lodgement and continues to engage with them. These documents set out the matters raised by mana whenua and how they have been addressed in the application, including through proposed conditions and the improvements package.
- 3.25 At the request of mana whenua certain material has been redacted where it contains culturally sensitive information. While Winstone’s views were sought regarding proposed redactions, ultimately that decision was for DOC and the Environmental Protection Authority to determine whether material should be withheld.

Section 4 Paragraphs 14-21, 23: NZCA provides comments regarding *net conservation benefit*, biodiversity and habitat, boundary effects and edge effects, restoration efforts, species identification and spatial distribution.

Response

- 3.26 Restoration efforts, including but not limited to pest plant and animal control, are proposed in Section 10 of Wikaira (2025) at pages 77-81. This will address edge effects from neighbouring rural lifestyle properties as part of the proposed management plan.
- 3.27 In preparing this answer, we have relied on the methods and results of Blue Green Ecology (2025:B1). Post-exchange, the increased perimeter length is an administrative matter and ecologically is connected into a contiguous habitat to the north and east. The boundary relates to land tenure, but the property boundaries are not the edge of ecological habitats. The “size, shape and buffering” of each block contributes to its ecological context score (Blue-Green Ecology (2025:B1) Table 5, page 28).
- 3.28 Per the supplementary material prepared by Boffa Miskell (03 March 2026) which shows that the length of the property boundary increases as a result of the proposal. The existing property boundary has a length of 16.31 km. The proposed property boundary is 19.88 km. This is approximately a 22% increase.
- 3.29 However, it is important to note that this measurement is of the property boundary, which is not necessarily the edge of ecological habitat.

Section 4 Paragraph 22: “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.”

Response

- 3.30 The net-gain in recreation value is demonstrated in Wikaira (2025) at [9.62]. This assessment is predicated on the position held by GWRC during consultation that it had no desire for new tracks to be constructed on land it managed to allow for connectivity, despite Winstone proposing several options that were canvassed with the GWRC Parks team.
- 3.31 In preparing this answer, We have relied on the methods and results of Rob Greenaway & Associates (2025:B4). The methods and results of Rob Greenaway & Associates (2025:B4, Page 8 Section 2.1; Page 13, Section 4) are replicated here, namely that the DOC-Give land has ‘low’ recreational value, and that the proposed exchange results in no-net-loss of recreational value.
- 3.32 Feedback has informed the design of the shape and layout of the DOC-Give land (and OBDA within) including but not limited to avoiding effects on Buchanan's Road Tramping Track (Rob Greenaway & Associates (2025:B4, Page 13, Section 4). Mr Greenaway concludes that the loss of the utility track section of the Buchanan Road Tramping Track is immaterial. Further to this point, it is worth noting that much of the Belmont Regional Park is found to be located on steep terrain and is unsuitable for track building, and therefore it

would not be prudent to use 'tracks' as a sole criterion for acceptability of the proposed exchange.

Wellington Conservation Board

3.33 The Wellington Conservation Board (WCB) provided comment on the proposal.

Paragraphs 2, 5-7: Research and use of volunteers

Response

3.34 The WCB states the proposed land exchange presents opportunities for longitudinal ecological research and highlights the significant contribution that volunteer groups have made to ecological restoration and community engagement within Belmont Regional Park.

3.35 In Wikaira (2025) at [10.13] is a description of an ecological restoration plan for the proposed improvement package for DOC, which has not been commented on in detail by those invited to comment. The Ecological Restoration Plan responds to mana whenua direction to strengthen their relationship and whakapapa to the area. In the preparation of this final draft, allowance could be made for the integration and involvement of the community into the development of this plan and restoration planting. Given the interest of Friends and Botanical Society in swamp maire, provision could be made for their involvement in the development of this plan.

This restoration plan includes (as a summary):

- a) Goat and possum control in the Northern Gully.
- b) Pest plant control in Cottle Block.
- c) Pest plant control in Southern Gully.
- d) Commitment to establish 200 swamp maire in suitable wetland habitat in Southern Gully.
- e) Pest plant control and replacement planting at Dry Creek, this includes but is not limited to ~7000 native plants or 8,000 sqm.
- f) Pest plant control and replacement planting at Firth QEII, this includes but is not limited to ~1000 Kamahi and ~1000 Olearia-Kanuka mix.
- g) Pest animal (rat) control at Firth QEII.

3.36 No person appears to have raised issue with the draft ecological restoration plan during the post-application, DOC-initiated consultation.

Paragraphs 3-4: Effects on ecological values including but not limited to scale and scope, and Swamp Maire.

Response

3.37 These matters are addressed in the reporting package filed by the Applicant, specifically Blue Green Ecology (2025:B1) at Section 9.3 (but also see s 4.2.4, 6.1.6, 6.2.5, 6.5.4), while being read in the context of Blueprint Ecology (2025:B2), and Boffa Miskell (2025:B3).

3.38 The methods and results of those reports was relied upon in preparing the Comparative Assessment of Conservation Values in Wikaira (2025) at [105]. That Assessment concludes that the project will '*provide a net conservation benefit*', while acknowledging that for some values (i.e. bats, archaeology) there is no change.

- 3.39 The Applicant has also proffered an improvements package (see Wikaira, 2025, at Section 10) which includes the replanting of Maire, Kamahi, Olearia, and Kanuka, along with pest plant and pest animal control. Those commenting on the proposal appear to have overlooked the conservation benefits offered by the improvement package.

Paragraphs 1, 9: “The Department’s 5 Year Regional Strategy (updated 8 January 2026) states that DOC will take an integrated landscape approach to conservation aligned to nature, rather than administrative boundaries. The intent is to ensure all factors and perspectives are weighed and prioritised. Supporting iwi and like-minded partners is critical to success in this context, adopting a strong partnership-based approach to mitigation efforts is vital.”

Response

- 3.40 The proposed land exchange does not preclude DOC from undertaking its work with an integrated landscape approach, in partnership with community and Te Tiriti partners. As indicated in the land exchange report Winstone has undertaken significant consultation with mana whenua, community, local, regional, and central government, infrastructure providers, neighbours, and other stakeholders and their views have shaped the exchange proposal. This feedback has informed the design of the shape and layout of the DOC-Give land (and OBDA within) to avoid features where possible.

Friends of Belmont Regional Park ('Friends')

- 3.41 Friends of Belmont Regional Park provided comments on the land exchange application. The following sections respond to the specific planning matters raised throughout the comments.
- 3.42 Since receiving written comment from Friends, Winstone has communicated (email 03/03/26) with Friends requesting a site walkover together to share information.

Paragraph 7: *"At the outset, we wish to note the unprecedented situation which this Fast Track Act creates. Under the Toitū Te Whenua Parks Network Plan 2020-2030 prepared under the Reserves Act 1977 and the Local Government Act 2002, a land exchange that takes land out of the regional park and reduces publicly accessible recreation areas, must be sent out for public submission. But that is not happening here."*

Response

- 3.43 At paragraph 7, Friends comment on the fast-track application process and make reference to the Toitū Te Whenua Parks Network Plan 2020-2030 in relation to public submissions.
- 3.44 Section 15 of the Application (Wikaira, 2025) assesses the matters that DOC and the panel take into account in preparing their respective report and decisions under Schedule 6, clauses 26 and 29 of the Act. Sections 15.26 - 15.32 provide an assessment of the Toitū Te Whenua Parks Network Plan 2020-2030 including an overview of the Plan and its statutory context, management outcomes sought for Belmont Regional Park, relevance to the exchange area and proposal, alignment of the exchange with park management objectives and land disposal under Toitū Te Whenua.
- 3.45 The written comment from Friends does not raise any new information that changes our methods and results in Wikaira (2025) at Section 15 (matters for the Director General to consider) with particular regard to Toitū Te Whenua at 15.26 of that report. The Fast Track Approval Act 2024 creates a new legal process for exchange applications to be considered. Winstone is entitled to rely upon that process.
- 3.46 Paragraph 8: *"It also appears that the RMA plan rules that currently apply to the land in the park, which strongly protect it against any use for overburden, are not proposed to be changed by a public plan change process before the exchange takes place. The Fast Track Act seems to say that the fact that this proposal could not get consents under current plan rules may not be a reason on its own to prevent this proposal going ahead. We find this approach to such an important proposal very concerning, because it means that you do not have perspectives from the public users who have accessed this part of the park and adjoining areas over past decades. Consequently, your reliance on information provided by the applicant, including expert evidence, should recognize this deficit."*

Response

- 3.47 Consideration of RMA planning provisions does not arise in the assessment of the land exchange. RMA plans only relevant to resource consent application, which has not been made yet and will form part of the substantive Fast Track application.
- 3.48 There is no requirement to undertake a plan change under the RMA in advance of lodging a substantive application for RMA approvals under the FTAA 2024. The RMA consent

application will be assessed by reference to the operative and proposed plan provisions, insofar as is required by the Fast-track Approvals Act.

- 3.49 The Applicant has consulted widely, including with GWRC, HCC, and other stakeholder groups such as the Friends, NZCA, WCB, QEII, and Game Animal Council and Fish and Game Council. A range of perspectives is evident in the comments received in Wikaira (2025:C1, C2). The majority of parties hold a neutral or support position, acknowledging that there are parties who hold an opposing position. Those views were carefully considered in the development of the proposal.
- 3.50 The suggestions in the Friends' comments that the OBDA development proposal "could not get consent under current plan rules" is not correct. The City of Lower Hutt Operative District Plan (PC56 version) zones the DOC-Give land as General Recreation Activity Area. The relevant Chapter (7A) does not contain any prohibited activity rules. In the absence of prohibited activity rules, the activity is able to be considered through the resource consent process.

Paragraph 13: *"The proposed land exchange has been discussed and declined twice by DOC, in 2018 and 2022; DOC concluded that the POBDA did not meet the criteria of having "no to low conservation value". Since then, the land in question is essentially unchanged, except that we now know that its ecological value is much higher than previously recognised."*

Response

- 3.51 This is the first time Winstone has made a formal application for a land exchange.
- 3.52 Section 14.3 notes previous decisions and discussions with the Department of Conservation in 2018 and 2022 were informal in nature. No application was lodged and no statutory decision was made under any legislative framework. As noted in the application, these details were provided for completeness. These discussions do not amount to a formal discussion or a decision to decline by DOC or GWRC.

Paragraph 14: *"The POBDA area has been found to contain healthy populations of swamp maire, ramarama and other endangered species. 24 swamp maire are known at present, and 11 of these are currently fruiting. The rare, uplifted wetland ecology that these species need, and the trees themselves, would also be destroyed."*

Response

- 3.53 No ecological features, *healthy populations of swamp maire, ramarama and other endangered species*, would be removed or destroyed as a result of the land exchange itself. This is an exchange of ownership of land; the only consequences of the exchange are changes in the ownership and status of land parcels. Any proposal to undertake physical works within the area would require approval through the substantive application process under section 42 of the Fast-track Approvals Act 2024 as part of RMA approvals.
- 3.54 This distinction has been confirmed through pre-application engagement with DOC and the completeness process undertaken by the Department of Conservation (section 34) in its letter dated 21 January 2026 '*Department of Conservation FTAA section 34 (completeness) check for a land exchange application (listed project)*'.

Paragraph 23: “Table 28 of the Land Exchange Report (p76) summarises the comparative assessment of the conservation of the various land areas, and we reproduce it here (noting that the stream lengths in their last row are transposed)”

Response

- 3.55 We agree that the stream length values in the last row are transposed. See Page 25 of Landscape Dynamics. Below is a corrected version of the same table (Wikaira, 2025, Page 76, Table 28.): This confirms that there is an increase in stream length values on DOC-managed land as a consequence of the proposed exchange.

Table 28: Summary of comparative assessment of conservation values.

Discipline	DOC-Give	DOC-Get	Net gain
Ecology (Habitat)	Moderate	Low- Very High	Yes
Ecology (Birds)	Moderate	High	Yes
Ecology (Bats)	Nil	Nil	Unchanged
Ecology (Lizards)	33.19 ha of habitat	18.83 ha of habitat	Yes
Landscape	Moderate	Moderate-High	Yes
Recreation	Low	Low	Unchanged
Archaeology	Very-Low	Very-Low	Unchanged
Aquatic	1,855 m of stream length	3,029 m of stream length	Yes

- 3.56
- 3.57 In preparing this advice we have relied on Landscape Dynamics (2025: B9) as well as the supplementary memo of Mr McConchie, particularly the methods and results set out at pages 2-3. DOC will receive a net-gain in stream length as part of the promised exchange.

Paragraph 24: “This summary relies on the assumption that the ecological values of the QEII areas within DoC-Get should be taken into account in the overall comparison. But that would make no sense, because those QEII areas already have legal protection, and thus already form part of the broader conservation estate. Their conservation value was created when they were first protected under a QEII covenant and cannot be created a second time. That they are not actually owned by DoC does not affect their ecological value, nor the ongoing protection afforded to those areas. Arguably, these areas are more protected under QEII covenants (none of which have been legally challenged) than they would be as DoC-owned land. The proposal would also transfer the onus of protection (e.g. pest control and boundary maintenance) from the applicant to DoC.”

Response

- 3.58 Section 9 of the Land Exchange Application Report (Wikaira, 2025, section 9) provides a Comparative Assessment of Conservation Values and provides a framework and method for the assessment.
- 3.59 The DOC-Get land (being private property subject to an Open Space Covenant) is not a conservation area or Crown-owned reserve as it is defined in Schedule 6 Clause 22, insofar as it is not subject to the Conservation Act. Therefore, the conservation values of DOC-Get land currently sit outside of the ‘conservation areas’. The Comparative

Assessment of Conservation Values (Wikaira (2025) Section 9) sets out an objective methodical assessment of the conservation values of both pieces of land, identified in that report as DOC-Give and DOC-Get. That Assessment demonstrates that the conservation values of the DOC-Get land is greater than that of the DOC-Give land. Such that, when an exchange does occur then the exchange '*will enhance the conservation values of land managed by the Department of Conservation*', i.e. the value of conservation areas will be enhanced by the inherent values of the DOC-Get land irrespective of its ownership, or existing protection.

- 3.60 The inherent ecological value of the QEII-covenanted areas within DOC-Get is real and not diminished by their current tenure or covenant status. That those areas carry existing protection does not reduce the significance of their contribution to the DOC estate upon exchange. Rather, transferring the land into Crown ownership adds meaningful protection over and above what the Open Space Covenant alone provides. DOC ownership brings with it active and funded pest management obligations, statutory duties under the Conservation Act 1987, and the practical benefit of physical and ecological integration with adjoining conservation areas. The Open Space Covenant protects the conservation values of the land in their current form, but those values are not presently realised as part of land managed by DOC. The proposed exchange changes that. Upon completion, the ecological values of the covenanted areas will be transferred into, and accounted for as part of, land managed by DOC, thereby satisfying the enhancement test under Schedule 6 Clause 29(2) in a direct and substantive way.
- 3.61 QEII National Trust (QEII) provided comment on the land exchange application on 25 February 2026 and confirmed that it maintains a neutral position regarding the Belmont Quarry Development. QEII's primary interest is that the purpose and objectives of open space covenant 5-07-755 are upheld and that the open space values protected by that covenant are not compromised. QEII has further confirmed that, regardless of ownership status, it will continue to monitor the covenant and ensure its purpose and objectives are maintained. Notably, QEII have not raised an issue in their comments or consultation with the covenanted land being included as part of the land exchange. Further, DOC has confirmed through consultation that it is accepting that the exchange land is subject to the existing Open Space Covenant.

Paragraph 31: *"The proposed land exchange has been discussed and declined twice by DoC, in 2018 and 2022 (see <https://environment.govt.nz/assets/what-government-is-doing/Fast-track-listed/Belmont-Quarry-Development/308.08-Additional-DOC-Feedback-FTA308-Belmont-Quarry-Development-project>). DoC undertook a site visit in 2018 and concluded that the POBDA did not meet the criteria of having "no to low conservation valued"; that position was unchanged in 2022. Likewise, the GWRC were also against the proposed land-swap. Since then, the land in question is essentially unchanged, except that we now know that its ecological value is much higher than previously thought."*

Response

- 3.62 The previous position taken by DOC on a land exchange proposal is not relevant to the current application. Previous indications by DOC staff were on the basis of informal comments, made under different statutory regimes, with different legal tests, and for which no formal application was made. They were akin to initial pre-application inquiries about the

possibility of availability of exchange that were never progressed. Winstone provided these details to be fully transparent and to ensure that DOC staff had a thorough understanding of historic albeit informal discussions that had occurred between Winstone, DOC, and GWRC.

- 3.63 Furthermore, the 2018 and 2022 concept was materially different from the 2025 land exchange package, now before the Director-General. The earlier iteration did not include several ecological area or improvement commitments that form part of the current application. The 2025 proposal has been substantially redesigned, informed by extensive consultation with mana whenua, DOC, GWRC, the community and technical experts. DOC's informal views from 2018 and 2022 were based on a different proposal, a different evidence base, and outside the Fast-track approvals framework. Those preliminary views therefore do not have relevance to the statutory assessment required under Schedule 6 of the FTAA 2024.

Paragraph 36: *"In summary, the FoBRP maintains that the applicant's inclusion in the comparative assessment of lands that already enjoy full and perpetual ecological protection amounts to double dipping, and presents a false picture of a net ecological gain, whereas a significant loss of conservation values would result in practice."*

Response

- 3.64 This application to the Director-General was lodged before commencement of the Fast-Track Approvals Amendment Act 2025, therefore the Act as it stood pre-amendment is relevant to the consideration of the exchange.
- 3.65 These matters are addressed in Reports: B1 Blue Green Ecology, B3 Blue Print Ecology, B3 Boffa Miskell, B4 Greenaway and Associates. The methods and results of those reports was relied upon in preparing the Comparative Assessment in Wikaira (2025), that concludes that the project will 'provide a net conservation benefit'¹, while acknowledging that for some values (i.e. bats, archaeology) there is no change. We also note our earlier comments, above in paragraphs 3.57-3.58, about the basis on which the conservation values of the QEII covenanted areas were accounted for in the proposed exchange.

Paragraph 45: *"Given these strong and informed observations that reinforce the special value and rarity of these plants and their habitat, the FoBRP consider that they represent one of the more valuable features of Belmont Regional Park, and that economic arguments cannot justify their destruction."*

- 3.66 The presence of swamp maire is well documented with a specific section in BlueGreen Ecology (2025:B1, Section 9.4, pg. 84). We consider that this section thoroughly and transparently documents the presence and distribution of that population.
- 3.67 The economic effects of the proposal are assessed in Market Economics (2025:B8). It appears as though that no commentator has opposed the methods or results of that report.

¹ FTAA 2024, Schedule 6, Clause 24, particularly subclauses 24(a) and 24(b).

- 3.68 Friends have not made any comment on that assessment or the benefits of the proposal, and their written comment does not identify any omission or deficiency in the economic assessment relied upon for the application.
- 3.69 As already noted, the land exchange will not result in the destruction of plants or ecological features.
- 3.70 We consider that the use of economic arguments to justify the destruction of plants and their habitats would constitute a trade-off, and that is not proposed in the design and documentation of the proposal. The application bundle methodically documents a comparative assessment, and assessment of effects on, conservation values across the exchange. At no point in Wikaira (2025) Sections 9, 10, and 11 is a trade-off relied upon to justify the exchange.

Paragraph 56: “We note that GWRC are not interested in taking on the responsibility of creating new access paths. Nevertheless, other parts of the Park support a rich network of community trails, which provide an invaluable and well-used resource for the Belmont and Kelson communities. There is a great potential for a similar initiative here, which could give a circular walkway that incorporates the regenerating ridges, the tranquil pond (Fig 4), the associated wetlands and taonga species. This would add a superlative recreation resource to the regional park for the local communities and thus fit well with the purpose of the park.

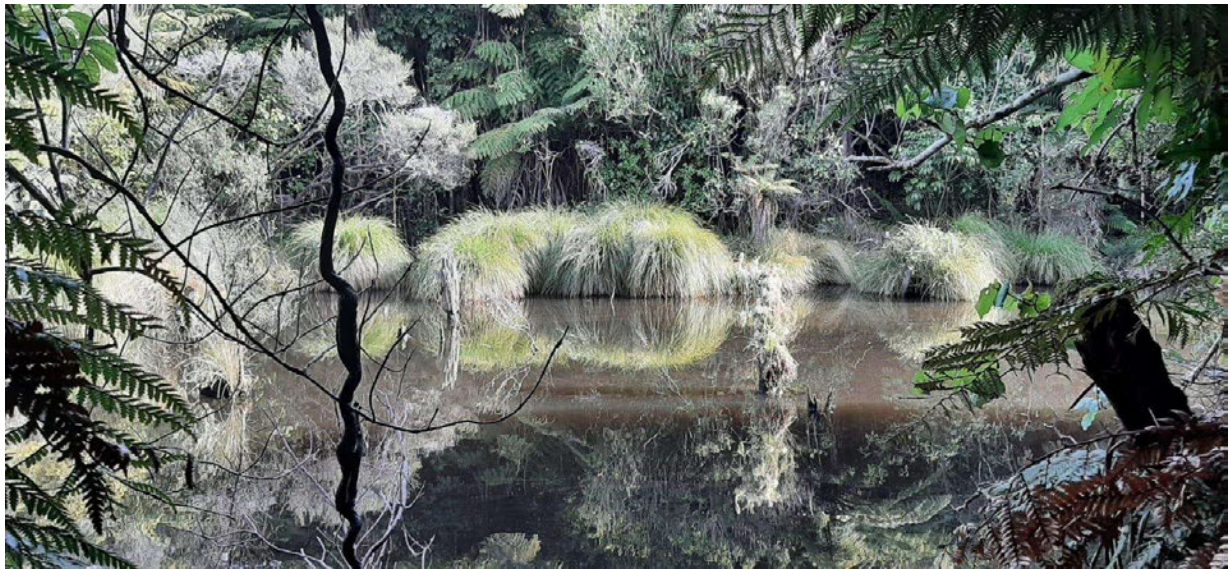


Fig 4: Pond at southern boundary of the POBDA, arguably one of the most beautiful features of Belmont Reginal Park”

Response

- 3.71 During consultation, staff from GWRC presented a view that there was no appetite for the creation of new tracks. Such a position is consistent with the absence of funding in Toitu Te Whenua and the LTP for the creation of a new loop track within the vicinity of the waterbody shown above (photo supplied by Friends).
- 3.72 The assessment by Rob Greenaway & Associates is that there is no net loss in recreation values as a consequence of the exchange.
- 3.73 Winstone remain open to further discussions regarding support of restoration or recreational facilities on Belmont Regional Park/ DOC owned land.

Paragraph 57: *"In terms of the impact on the existing recreation routes outside the POBDA, obviously the quarrying activities would create significant noise, visual pollution and dust. 40% of the Buchanan Road tramping track would have line of sight and spoiled views as a result of the proposal (Fig 5).*

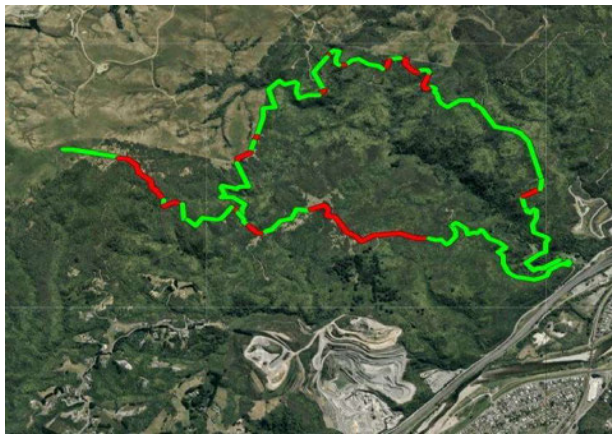


Fig 5: 40% of the main recreation resource in the park would have spoiled views."

Response

- 3.74 The creation of 'significant noise, visual pollution and dust' is not proposed as part of Land Exchange application to the Director-General. This application is made as a preliminary step for resource consent, to allow for the Director-General to prepare a report. Consideration of effects on the environment is a matter that will be addressed when Winstone Aggregates lodges its substantive application for resource consents and other approval types.

Paragraph 58: *"Policy 3.3.2.5 of The Wellington Conservation Management Strategy (CMS) 2019 states the need to: Avoid, or otherwise minimise, adverse effects on the qualities of peace and natural quiet, solitude and remoteness in places where this is an important feature and expectation of the visitor experience."*

Response

- 3.75 The Wellington Conservation Management Strategy (CMS) 2019 does not apply to the DOC-Give and DOC-Get land currently, at the time of making this application. While the

CMS is expected to apply to the DOC-Get land if it becomes part of the conservation estate following the exchange, Policy 3.3.2.5 of the CMS is not applicable to the land exchange proposal.

- 3.76 The reasons given in Wikaira (2025) at [15.21] to [15.25] are adopted here.

Paragraph 59: *“The FoBRP take a long-term view, that the lands within the POBDA are a valuable resource for the people of the Hutt Valley, and that the current recreation value of the POBDA is high, with the potential for future enhancements that would hugely benefit the local communities. The FoBRP also maintains that the lands proposed for the exchange cannot be used for recreation, as the current park land (POBDA) certainly is, and that the land proposed for exchange is therefore not suitable.”*

Response

- 3.77 During consultation, staff from GWRC presented a view that there was no appetite for the creation of new tracks. Such a position is consistent with the absence of funding in Toitu Te Whenua and the LTP for the creation of a new track.
- 3.78 The assessment by Rob Greenaway & Associates is that there is no net loss in recreation values as a consequence of the exchange.
- 3.69 Winstone remain open to further discussions regarding support of restoration or recreational facilities on Belmont Regional Park/ DOC owned land.

Paragraph 62: *“A longer perimeter will greatly amplify the “edge-effect”, whereby the conservation values near the edges of conservation land are depleted over time through incursion of invasive weeds, pest animals, and (for example) airborne pathogens, such as myrtle rust. This effect is already pronounced and obvious along the current POBDA boundary with the quarry.”*

and

Paragraph 64: *“A longer perimeter would also provide more workload for the new land-owner, which could be at odds with section 1B of the FAA, section 3c, which states that the report from DoC to the panel must assess “whether the consequences of the land exchange would be practical to manage on an ongoing basis, including consideration of whether the land exchange would result in an enclave of private land within a conservation area”.*

Response

- 3.79 Post-exchange, the increased perimeter length is an administrative matter, and ecologically is equally connected into a contiguous habitat. The boundary relates to land tenure, but the property boundaries are not the edge of ecological habitats.
- 3.80 BlueGreen Ecology (2025, pg. 90) identifies weed control and pest management, in accordance with an ecological restoration plan, following the exchange as part of its proposed conditions. Any concern about edge effects can be addressed as part of that plan. This matter could be added to the list of items to go into the plan included in the proffered conditions.

Paragraph 65: *“Although the proposal would not entirely land-lock the then privately-owned POBDA, it would create a geometry which is all but land-locked, with the DoC-Get areas physically remote and stretched away from the existing conservation lands.”*

Response

- 3.81 Post-exchange, the land will be no more ‘*physically remote and stretched away from the existing conservation lands*’ than it is currently. From an ecological perspective, the land is still equally connected as it is today, in relation to the highly mobile species such as birds which will regularly cross property boundaries. The boundary relates to land tenure, but the property boundaries are not the edge of ecological habitats.
- 3.82 In preparing this answer, we have relied on the methods and results of Blue Green Ecology (2025:B1, p. 67).

Paragraph 69: *“Moreover, the state of the abandoned Dry Creek quarry workings – full of weeds, including uncontrolled pampas grass and buddlia – brings into question the applicant’s true commitment and ability to protect the environment, and begs the question as to what condition the applicant would leave the POBDA in after the overburden disposal had been completed. Section 26 of the FAA also states that the Director General of Conservation must address the matter of any legal or financial liabilities resulting from the land exchange. The FoBRP contends that, without a very significant financial bond lodged with the department, the possibility that the applicant (or the parent company, Fletcher Challenge) becomes insolvent after overburden work has commenced, would leave the region with an ecological and financial liability.”*

Response

- 3.83 Post-closure remediation of previous works (successful or otherwise) is not the subject the of this application.
- 3.84 Proposed conditions requiring weed control, pest management and restoration planting across the DOC-Get land and the preparation of an Ecological Restoration Plan are provided in Wikaira (2025, p.91–94).
- 3.85

Paragraph 73: *“This point is important, because this stream feeds not only a rare, uplifted wetland, but also flows into the Firth block, immediately downstream. Burial of this stream, and consequent addition of fines and soil particulates into it, would adversely affect the QEII protected lands downstream. This would presumably contravene the terms of the Firth Block QEII covenant.”*

Response

- 3.86 The ‘*Burial of this stream, and consequent addition of fines and soil particulates into it*’ is not proposed as part of Land Exchange application to the Director-General. This application is made as a preliminary step for resource consent, to allow for the Director-General to prepare a report. Consideration of adverse effects on the environment will be addressed as part of the resource consent approvals that will be sought under the substantive application.

Paragraph 74: *“On page 98 of the Land exchange report, Table 31 lists regulations that apply, and Regulation 53 (of the National Environmental Standards for Freshwater) prohibits drainage of a natural inland wetland, with the applicant comment on page 99 that “That is not proposed here. The NES-F prohibitions do not apply”.*

Response

- 3.87 The Regulations of the NES-F are not a relevant matter for the Director-General under Schedule 6 Clauses 26.
- 3.88 If the Friends have a view that the NES-F Regulations are relevant to the overall Belmont Development Project, then that is a matter that can be addressed at the substantive application stage when Winstone Aggregates will be seeking all necessary resource consent approvals.

Paragraph 75: *“However the plans (eg Fig 4, p19 of the land exchange report) clearly show that their OBDA area includes half of the pond and all of the valley upstream of it. That is a natural inland wetland and presumably must therefore be protected.”*

Response

- 3.89 This application is made as a preliminary step for resource consent, to allow for the Director-General to prepare a report. Consideration of adverse effects on the environment will be addressed as part of the resource consent approvals that will be sought under the substantive application.

Paragraph 76: *“After the initial discovery of 14 swamp maire within the POBDA, the applicant brought the western boundary eastwards in an attempt to mitigate the impact, ostensibly by avoiding the swamp maire. However the submitted plans (eg Fig 2.1 on p3 of the Hydrology Assessment) show the catchment upstream of these trees to be within the POBDA, and if the hydrology in this gully is modified, this grove of swamp maire could be expected to die within one or two years, as was explained in section 3 above.”*

Response

- 3.90 The modification of hydrological drainage patterns is not proposed as part of Land Exchange application to the Director-General. This application is made as a preliminary step for resource consent, to allow for the Director-General to prepare a report. Consideration of adverse effects on the environment will be addressed as part of the resource consent approvals that will be sought under the substantive application.

Paragraph 79: *“The FoBRP is grateful, therefore, for the opportunity to comment on the proposed land exchange, as we are well suited to review the various assessments and report, some of which are clearly derived from a brief and superficial acquaintance with the land, and many of which contain misleading and incorrect data and conclusions.”*

Response

- 3.91 Winstone Aggregates has commissioned a wide range of expert reports, which are publicly available on the Government website:
- a) <https://www.fasttrack.govt.nz/projects/belmont-quarry-development/land-exchange-application>
- 3.92 Winstone Aggregates considers that its consultants' reports are appropriately detailed, based on relevant information and appropriate methods. We disagree with the suggestion that the reports are brief, superficial, misleading and incorrect, and note that no expert reports have been provided by the Friends that contradict the reports submitted by Winstone.

Paragraph 81: *“Based on the information presented above, the FoBRP is of the firm belief that the proposed land exchange cannot provide a net gain to conservation lands, but would in reality result in a significant net loss in conservation values, and a significant loss in recreation values. The assessments into recreation and hydrology in particular are woefully inadequate, and do not accurately represent the value of the park lands desired by the applicant. The ecological assessments include already protected conservation lands to bolster the value of the exchanged lands, and the proposals would destroy 50 to 80 year old swamp maire populations in exchange for a re-planting programme with no guarantee of success. The proposal would dramatically fragment the existing regional park boundary, and significantly decrease the ecological values of the area in the process.”*

Response

- 3.93 These matters are addressed in Reports: B1 Blue Green Ecology, B3 Blue Print Ecology, B3 Boffa Miskell, B4 Greenaway and Associates. The methods and results of those reports was relied upon in preparing the Comparative Assessment of Conservation Values in Wikaia (2025). That Assessment concludes that the project will ‘provide a net conservation benefit’², while acknowledging that for some values (i.e. bats, archaeology) there is no change.
- 3.94 The proposed land exchange will not destroy or damage any ecological values in the exchange areas. Any impact on ecological values will be assessed separately at the substantive application stage.

Paragraph 82: *“The proposal would provide short-term economic gain for a private company, at the expense of public recreation and conservation for generations to come.”*

Response

- 3.95 Market Economics (2025:B8, p.23) identifies the economic effects extend beyond the quarry operation and that the land exchange would generate significant net economic benefits at the regional level, including maintaining the local supply of aggregate required for construction and infrastructure and avoiding increased reliance on imported aggregate.

² FTAA 2024, Schedule 6, Clause 24, particularly subclauses 24(a) and 24(b).

- 3.96 The methods and results of Market Economics (2025:B8) were relied upon in the preparation of the Comparative Assessment of Conservation Values in Wikaira (2025) and are adopted here.

Paragraph 83: *“The FoBRP respectfully requests the Director General and the Department to advise the Fast-track panel that the application is not for the good of New Zealand or New Zealanders, and does not meet various applicable criteria for land exchanges to be approved”.*

Response

- 3.97 The Land Exchange report (Wikaira, 2025) sets out the relevant statutory tests and provides evaluation against each point. Whether the application is ‘not for the good of New Zealand or New Zealanders’ appears to be an incorrect interpretation of the relevant tests in the FTAA 2024 at Schedule 6 Clause 29.

Paragraph 84: *“However, if the application were to proceed, the view of FoBRP is that – at the very least – the OBDA eastern boundary be brought west by about 200m to fully protect the pond and the full catchment of the shallow valley and wetland upstream from it, and so protect the swamp maire and ramarama populations in that valley. That would also protect the area containing the Ngahere gecko population, and potentially provide future recreation access to the forest in the QEII Firth block.”*

Response

- 3.98 The spatial size, extent, layout, and orientation of the OBDA is carefully and iteratively designed with numerous factors in mind, including feedback from extensive consultation, geotechnical engineer, operational functions of machinery, and including but not solely to minimize effects on terrestrial biodiversity. It is likely that if the footprint shifts that there will be adverse effects on other matters as a consequence of redesigning the OBDA proposal.
- 3.99 In any event, the effects of the proposed OBDA will be addressed as part of Winstone’s substantive application for resource consents and other approval types, and these effects are not relevant to the land exchange.

Paragraph 85: *“Furthermore, the FoBRP would strongly request that, if a land exchange were to be approved, the actual exchange would not be executed unless the substantive application were also to be successful.”*

Response

- 3.100 Winstone Aggregates has filed the report with the Director-General per section 33 of the FTAA 2024. This is done as a preliminary step to a Substantive Application being made. The proposed land exchange and resource consents will be considered concurrently by the Panel. On that basis, the Land Exchange does not need to be conditional on the Resource Consent (including Wildlife Permit and Archaeological Authority), as they will be considered concurrently. The Land Exchange is able to be granted independently of the necessary resource consents, if the panel concludes that it meets the statutory tests.

Paragraph 86: *“Also, the land exchange report states that “DoC-Give land areas are zoned as a General Recreation Activity Area within the HCC Operative District Plan and as a Natural Open Space Zone within the Proposed Lower Hutt District Plan 2025”. If the exchange proceeds, there should be a condition that the applicant seeks a plan change to apply these provisions to the DoC-Get land, so that it does not have less protection than the DoC-Give land.”*

- 3.101 Winstone Aggregates has filed a submission on the Proposed Lower Hutt District Plan, which is publicly available on council's website. The submission identifier is PDP/444.
- 3.102 There is no requirement to undertake a plan change under the RMA in advance of lodging a substantive application for RMA approvals under the FTAA 2024.
- 3.103 Considering that the submissions (and further submissions) period has closed, there is no ability (or obligation) to make additional submissions on this matter, which is before the independent hearings panel. There would be no utility in Winstone being required to seek a plan change when the points raised by the FOBRP are already submission points that will be addressed in the plan making process for the Proposed Lower Hutt District Plan.

Transpower New Zealand

- 3.104 Transpower New Zealand Ltd ('Transpower') provided comment on the proposal, in the form of a letter from A. Ecclesfield dated 24th February, 2026.
- 3.105 In summary, Transpower stated
- a) *'Transpower has previously outlined in a letter to Winstone Aggregates, that Transpower has no concerns with the proposed land swap at Belmont Quarry. The content of the letter to Winstone Aggregates regarding this matter remains accurate. I understand the Department is likely to have seen this letter as part of the land exchange process. For completeness it is attached.'*
- 3.106 We have no additional comments in response to the Transpower letter (24/02/2026) beyond what is already stated in the Land Exchange Application (Wikaia, 2025: C1). This reflects the consultation undertaken with Transpower.

Firth Masonry

- 3.107 Firth Masonry provided a letter with comments dated 25 February 2026.
- 3.108 In summary, Firth Masonry stated
- a) *'We have reviewed the land exchange application and are already familiar with the areas being proposed for exchange. We have no further comments on the land exchange and are fully supportive of the land exchange and the continued operation of Belmont quarry as a key regional supplier.'*
- 3.109 No further response is required beyond what is already stated in the Land Exchange Application (Wikaia, 2025: C1).

Fulton Hogan

- 3.110 Fulton Hogan provided a letter with comments dated 19 February 2026 and noted support for the proposed land exchange as a necessary step to ensure the ongoing viability of Belmont Quarry and the security of delivery for ongoing infrastructure delivery within the region.
- 3.111 No further response is required beyond what is already stated in the Land Exchange Application (Wikaia, 2025: C1).

Wellington Botanical Society

- 3.112 The Wellington Botanical Society (the 'Botanical Society') provided comment on the proposal. The letter is undated but was received in February 2026.
- 3.113 The Botanical Society notes their earlier letter of 18 September 2025.
- 3.114 In its written comment, the Botanical Society confirms its continued opposition to the proposal to swap DOC land for private land. The Botanical Society asserts that the DOC-Give land has high ecological value.
- 3.115 The matters raised by the Wellington Botanical Society regarding the presence and habitat of maire tawake (*Syzygium maire*) do not introduce new information.
- 3.116 The species was identified through the ecological field surveys undertaken by BlueGreen Ecology (2025:B1), with *Syzygium maire* recorded in the vegetation survey plots (BlueGreen Ecology 2025:B1, p.98). The ecological report also includes a detailed assessment of swamp maire presence and habitat within the DOC-Give area (BlueGreen Ecology 2025:B1, s9.3, pp.86 to 90).
- 3.117 Much of the written comment made by the Botanical Society focuses on potential and actual adverse effects on the environment as a result of the placement of overburden onto land, e.g. where the placement of fill would alter hydrological drainage patterns and the effects of that on Tawake survival. We consider this to be out of scope of this step in the process, which is a preliminary application made for the Director-General to prepare a report. This application (to the Director-General) does not seek permission to place soil onto land, or alter drainage characteristics of any land.
- 3.118 We note that Blue Green Ecology has prepared responses to the written comment made by the Botanical Society, which is outside of my area of expertise including but not limited to: species identification, species presence/absence in the proposed exchange area, the conservation status of any species, habitat preferences for any species, the likelihood of success of restoration efforts or translocation, habitat types in the Wellington Region, effects such as changes in hydrology or pathogens (e.g. myrtle rust), flowering and fruiting, and or evaluation of biodiversity value of exchange land.

4 Conclusion

- 4.1 This memo has been prepared Wikaira Consulting (with support of Derive Consulting) who have expertise in planning and engagement. It responds to comments received by DOC during the consultation process required under the FTAA 2024. The paper addresses matters of consultation, engagement, and planning arising from the comments of invited persons and groups, including Ngāti Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika, the Friends of Belmont Regional Park, Greater Wellington Regional Council, Hutt City Council, the New Zealand Conservation Authority, the Wellington Conservation Board, the Wellington Botanical Society, QEII National Trust, the New Zealand Transport Agency, Heritage New Zealand Pouhere Taonga, and commercial interests including Firth Masonry and Fulton Hogan.
- 4.2 Several parties adopted neutral positions on the proposed land exchange, including Hutt City Council, QEII National Trust, and Ngāti Toa Rangatira. Commercial submitters expressed support for the proposal. Concerns were raised by the Friends of Belmont Regional Park, the New Zealand Conservation Authority, the Wellington Conservation Board, and the Wellington Botanical Society. The key issue raised by those parties is whether the proposed exchange would deliver the net conservation benefit required under the Act, given that a portion of the land proposed for acquisition by the Crown is already subject to QEII open space covenants. Concerns were also raised regarding recreation values of the land to be exchanged, the economic benefits of the proposal were not disputed.
- 4.3 In response, Winstone Aggregates relies on its commissioned expert reports (both in the original application and in response to written comments), which conclude that the exchange would deliver a net conservation benefit when assessed in accordance with the FTAA 2024. Winstone Aggregates maintain that the inclusion of QEII-covenanted land in the comparative assessment is available under the FTAA 2024.
- 4.4 Those matters, and the specific points raised by each party, are addressed in the body of this memo.