



Belmont Quarry Development – Part F

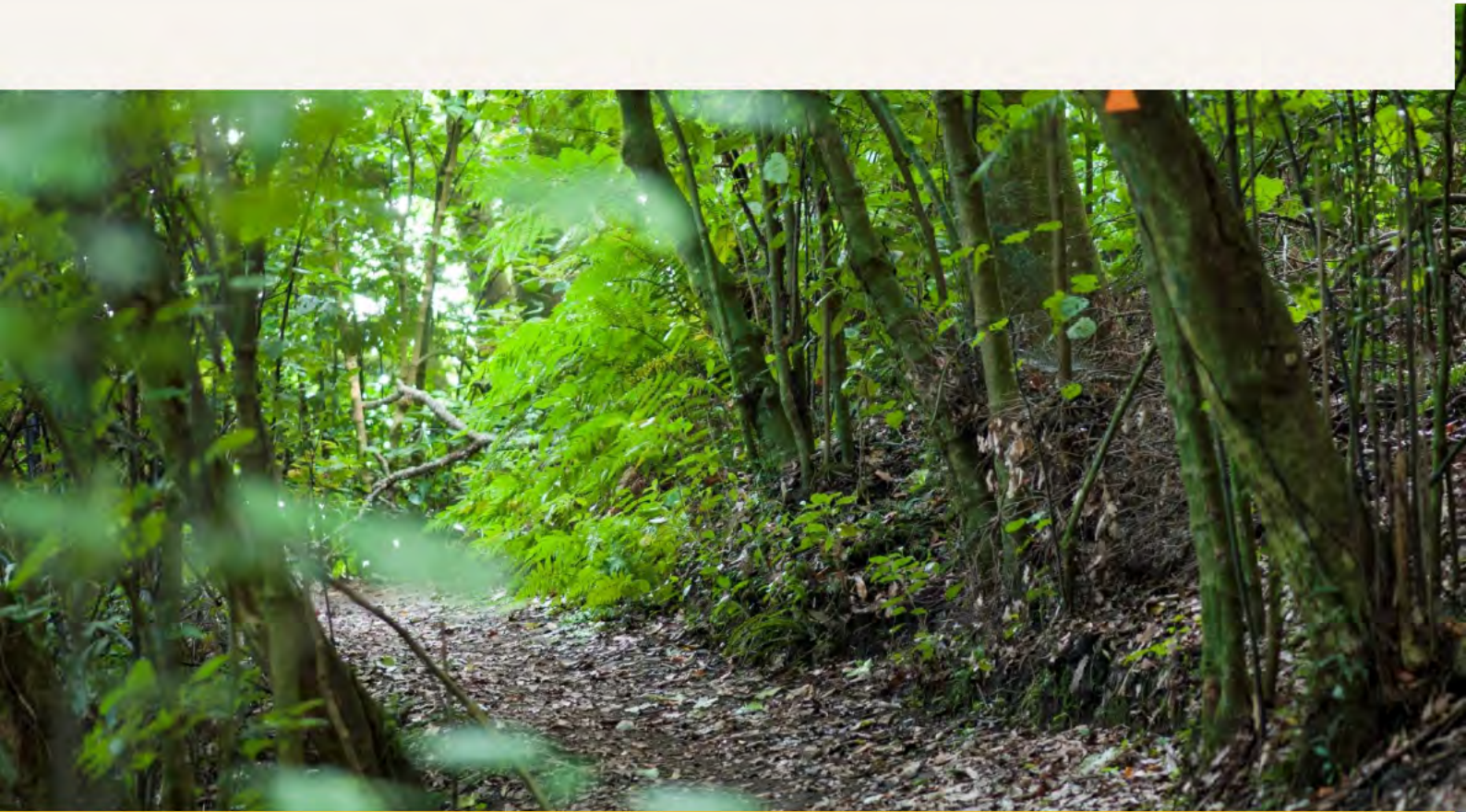
Substantive Application
Appendix F.7 – Final Department of
Conservation Report on Land Exchange
Application
Winstone Aggregates

16 August 2026

7 July 2026

Report on land exchange

Belmont Quarry – FTAA-2603-L003



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

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Cover photo: Mount Ngongotaha Scenic Reserve (credit: Nicole Porter Photography)

1 Introduction

1. This report has been prepared on behalf of the Director-General of Conservation under section 35(3) of the Fast-track Approvals Act 2024 (**FTAA**) by the Department of Conservation (**DOC / the Department**). It provides information and advice for Winstone Aggregates (**Winstone/the Applicant**) for the Belmont Quarry development project. In accordance with section 35(7) this report must be provided to the applicant by 7 July 2026 as specified by the Panel Convener.
2. Pursuant to section 35(3), this report must include certain information. The requirements and where the information can be found is set out in the table below.

Section	Requirement	Report section
s 35(3)(a)	the matters specified in clause 26 of Schedule 6	Section 5
s35(3)(b)(i)	the information lodged under s33(1)	Appendix 1
s35(3)(b)(ii)	any comments received under subsection (1) or (5)	Appendix 1 Appendix 3

3. This report may also include advice on matters relevant to sections 82-84 under s35(4) as set out below.

Section	Requirement	Report section
s82(2)	consideration of any document provided for in a relevant Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, or the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	Section 6.1
s82(3)	whether granting the approval would comply with s7	Section 7
s83	Conditions – noting that a condition must not be more onerous than necessary to address the reason for which it is set	Section 5.7
s84	Conditions which may be set to recognise or protect a relevant Treaty settlement and any obligations arising under the Marine and Coastal Area (Takutai Moana) Act 2011, or the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	Section 5.7.1.3

4. While the land exchange proposal is for the purposes of an application to extend the life of the Belmont Quarry and store overburden, this report does not consider any future land uses and concentrates entirely on the effects of a change in ownership.
5. The purpose of this report is to provide an overview of the information provided by the Applicant and advice of technical experts to DOC. It is not intended to be a one-stop-shop

and all the technical reports and comments are available either appended to this report or on the Fast-Track website¹ should a reader seek further information.

6. It does not provide a recommendation on whether the land exchange should be approved. That is for the Expert Consenting Panel to make its own decision when it is appointed.

2 The land exchange application

7. Winstone Aggregates lodged an application for a land exchange relating to the Belmont Quarry Development project (a listed project under the FTAA) with the Department of Conservation on 10 December 2025. Belmont Quarry is accessed off Hebden Crescent, approximately 1.7 km to the south-west of the Dry Creek entrance to Belmont Regional Park. The quarry occupies part of the escarpment defining the edge of the Hutt Valley, approximately 6 km north-east of the Lower Hutt CBD.
8. The proposed exchange involves land adjoining the existing quarry. This application forms part of a broader development proposal that will be advanced through a subsequent substantive application under section 42 of the FTAA.
9. The application is for up to 34 hectares of Fletcher-owned land to be added to the conservation estate and approximately 23.24 - 23.86 ha hectares of conservation land within Belmont Regional Park to be transferred to Winstone Aggregates. The land exchange report prepared on behalf of the Applicant explains that the exact area of land will be confirmed once a topographical survey of the exchange areas is completed. For the purposes of this application, it is noted that there is inconsistent use of areas due to the paper road, including different approaches to rounding in the expert reports and whether or not the alignment of the paper road footprint has been excluded from the land to be exchanged. This results in variances in the description of area from approximately 23.24 ha to 23.86 ha (including the paper road area). For avoidance of doubt, the area including the paper road is sought for exchange and will form part of the footprint for the resource consent approvals in the future substantive FTAA application.
10. The unformed paper road can only be stopped by Hutt City Council as the road controlling authority (not through the FTAA process) and DOC understands that Winstone has engaged with Hutt City Council regarding this matter.
11. The land exchange application can be found at:
<https://www.fasttrack.govt.nz/projects/belmont-quarry-development/land-exchange-application>.

2.1 The land proposed to be exchanged by the Crown

12. Winstone Aggregates is a division of Fletcher Concrete and Infrastructure Limited which owns the land Winstone Aggregates offers in exchange. 'DOC-Give' refers to the Crown reserve land within Belmont Regional Park that Winstone seeks to obtain for an overburden disposal area as part of the Belmont Quarry Development Project.
13. The DOC-Give site was vested in the Crown on 13 September 1979 for state housing purposes pursuant to section 32 of the Public Works Act 1928 (New Zealand Gazette 1979, p 2687). Pursuant to section 42 of the Public Works Act 1981, these titles were declared to be Crown land under the Land Act 1948 on 8 March 1983 (New Zealand Gazette 1983, p 751).

¹ <https://www.fasttrack.govt.nz/projects/belmont-quarry-development/land-exchange-application>

14. The DOC-Give site was later set apart as a recreation reserve under the Reserves Act 1977 by notice in the New Zealand Gazette on 10 June 1989 (No. 107, p. 2757). On 24 May 1991 Greater Wellington Regional Council was appointed by the Minister of Conservation to control and manage for recreation purposes the Dry Creek Recreation Reserve (New Zealand Gazette 1991 No. 80, p. 1765). The underlying freehold interest in the land remains vested in the Crown. The DOC-Give site is essentially a Crown-owned reserve managed by Greater Wellington Regional Council. It is classified as a recreation reserve and subject to the Reserves Act 1977.²

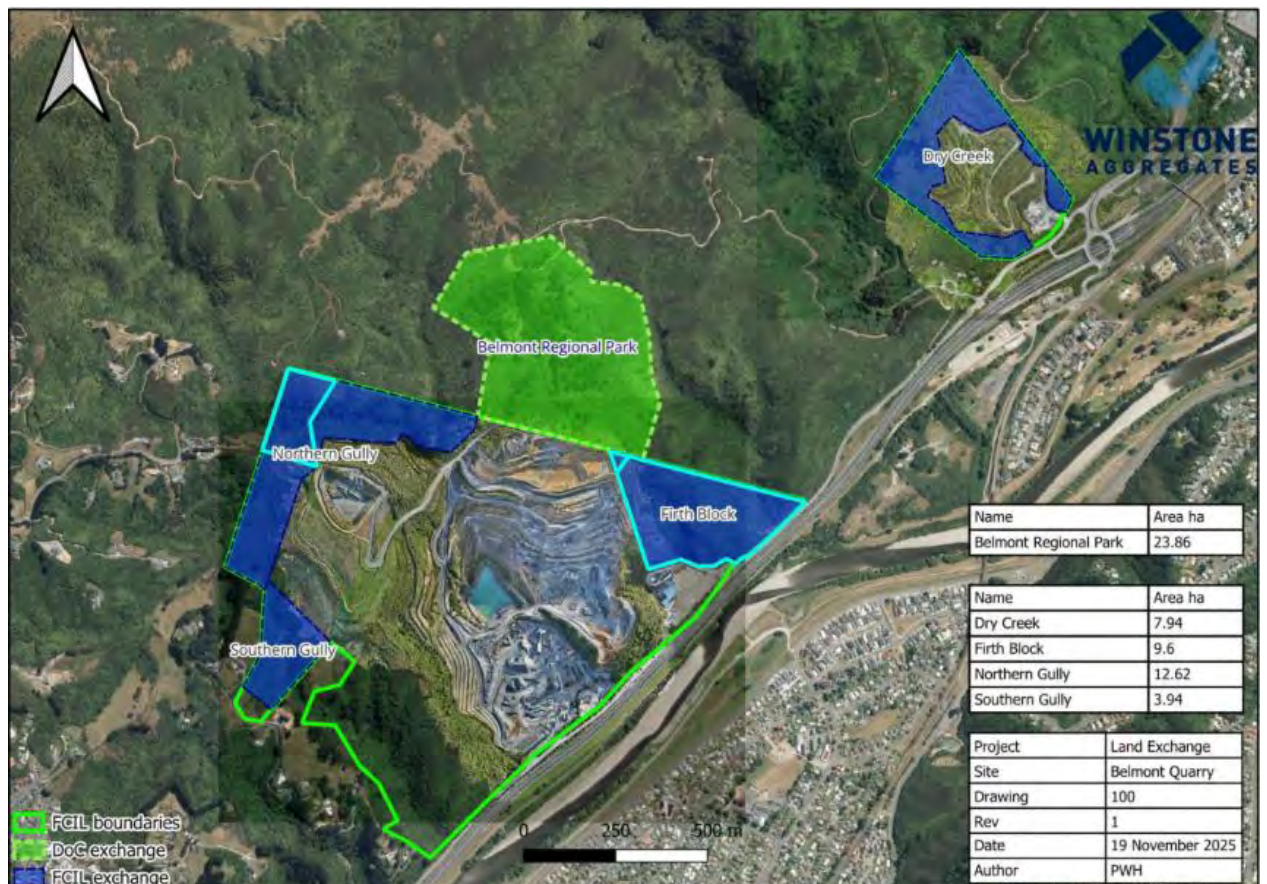


Figure 1: Overview of proposed land exchange parcels³

15. The DOC-Give site is located immediately north of the Belmont Quarry and is shown in green as “DOC exchange” in Figure 1.
16. The DOC-Give site is described as predominantly regenerating native broadleaf forest that increases with age towards the stream. Its highest point is 210 metres above sea level down to 152 metres above sea level at its lowest point. The western gullies are more steeply incised, while the eastern network is broader and supports wetlands. The Applicant’s landscape assessment describes the physical attributes as a rolling ridge top and spur which is flanked by the upper reaches of steep undulating gullies. The wider landscape comprises of a series of gullies contained beyond steeper spur faces which rise from the Hutt Valley

² Land Exchange Report, Wikaira Consulting, dated December 2025 at [5.38-5.40]

³ Land Exchange Report, Wikaira Consulting dated 7 December 2025 page 31

floor. There are no buildings although there are wire fences reflective of historic farming activity. The National Grid electricity transmission towers and conductors extend along the northern boundary.

17. Jeremy Head (landscape architect advisor to DOC) has supplemented this with the following description of the physical values:
- a. Source water for downstream wetlands and several streams that eventually flow into the Hutt River (tributaries).
 - b. The wetlands (0.23 ha) and waterways that are present have not been modified in recent times and have well-vegetated riparian margins in a 'natural' state.
 - c. Regenerating wetland forest, including 'good quality' wetlands within the area as well as directly to the northeast of the land parcel.
 - d. Vegetation includes some Nationally Threatened plant species.
 - e. Ridges between the arms of the headwaters include large 'old man' pine, macrocarpa and regenerating kāmahī or mānuka type forest.
 - f. Edges are sound without obvious areas for weed species invasion.
 - g. The flat area in the central / north part of the land parcel once included farm buildings, where the area is now mostly in large macrocarpa with some open exotic grassed areas.
 - h. No planting or major earthworks are present, other than an old pylon access track / farm road.
 - i. Approximately 340 m long shared boundary with the quarry.
18. The range of habitats includes:⁴
- a. Natural inland wetlands - The vegetation in these areas is predominantly kiokio, native sedges (*Carex geminata*), rushes and ferns with edges of tree fern, mānuka and broadleaf shrub species.
 - b. Pioneer shrublands and emerging scrub. Where pasture has most recently been the vegetation cover, gorse is the main pioneer species.
 - c. Māhoe-tree fern forest – this is a continuous strip along the main valley floor.
 - d. Māhoe / broadleaved scrub – this is found in several south-facing gullies. The canopy ranges from 3-8 m height. These areas have a good diversity of under-canopy.
 - e. Mānuka scrub ranging from 3-6 m in height. The understorey can be reasonably dense.
 - f. Exotic trees, comprising macrocarpas located on the upper ridge.
19. As described by Mr Matt Ward⁵ (botanist advising DOC), the DOC-Give site is dominated by mānuka/kanuka on the eastern edge, while the southwestern edge contains tawa, kāmahī, podocarp forest (regionally endangered with 22% remaining). The DOC-Give site also has sections of kahikatea and pukatea forest (regionally critically endangered with 1% remaining). A key species present is the *Syzygium maire* – swamp maire, which is a specialist

⁴ Ecological Assessment, BlueGreen Ecology, dated December 2025, pages 57-61

⁵ Statement of advice – Botanical and ecological restoration, Matt Ward dated April 2026 at page 11

obligate wetland species and a Threatened - Nationally Vulnerable species. The gullies are in good health with a canopy of tree fern and a general absence of weed species.

20. There are three short intermittent stream reaches in this area, but of most significance is the ephemeral headwaters of six gully systems that feed into the perennial systems and the natural inland wetland. Four hundred metres of each reach of the central main stem and western main stem were surveyed for macroinvertebrates, fish and habitat conditions. The perennial reaches are described as having good macroinvertebrate habitat and kōura. A single shortfin eel, single longfin eel and kōura were observed.⁶
21. The recreation assessment notes the presence of a 4WD track of around 400 m length which forms an extended loop off the Buchanan Road Tramping Track. The estimated number of users are around 6,570 per year as it is not marked on the Track route.⁷, although Michael Harbrow (advisor to DOC) has some concerns about these numbers due to the dependence on data captured by Strava which is more likely to be used by participants in active sports like cycling and running.⁸

Consultation

22. Where land proposed to be exchanged is Crown-owned reserve managed by someone other than DOC, in preparing this report the Director-General is required to consult the manager of the reserve pursuant to clause 26(3) of Schedule 6. In relation to this application, this requirement is engaged due to management of the DOC-Give land by Greater Wellington Regional Council.
23. The extent of communications between DOC and Greater Wellington Regional Council are as follows:
 - a. Pre-lodgement discussions relating to the exchange and future designation requirements.
 - b. Invitation to comment under section 35 of the FTAA (28 January 2026).
24. This is further addressed in Section 5 below. The Applicant outlined its engagement with Greater Wellington Regional Council as follows:⁹
 - a. 2018-2021 early discussions about a potential exchange.
 - b. 2024 discussions regarding its application to be a listed project.
 - c. 2025 site visits with Elected Members.
 - d. 2025 discussions regarding the proposed land exchange.

2.2 The land offered by the Applicant

25. 'DOC-Get' refers to the four Fletcher-owned parcels proposed to be transferred to the conservation estate called the Northern Gully, Southern Gully, Firth and Dry Creek blocks. The land adjoins Belmont Regional Park and includes a mix of forest, scrub and wetland environments. Four parcels are proposed to be transferred to DOC and adjoin Belmont Regional Park. A description of each parcel is outlined below.

⁶ Ecological Assessment, BlueGreen Ecology, dated December 2025, section 8

⁷ Recreation Assessment, Rob Greenaway & Associates, dated December 2025, pages 6 and 9

⁸ Statement of advice of Michael Harbrow, dated 21 April 2026 at [49-50]

⁹ Land Exchange Report, Wikaira Consulting dated 7 December 2025 at section 8.2 and 8.3

Northern Gully

26. As the block is privately owned there is currently no public or recreational access.
27. The site is L shaped and located north-west of the quarry, and measures 12.62 ha. A QEII covenant is located over part of this block that was put in place in 2016. The purpose of the covenant is to protect and maintain the natural character of the covenant area and covers 2.87 ha. The objectives of this covenant are:
- Protection and enhancement of the natural character of the Covenant Area with particular regard to the indigenous flora and fauna;
 - Maintenance and enhancement of the landscape values of the Covenant Area;
 - Enhance the contribution that the Covenant Area makes to the protection of indigenous biodiversity, by encouraging (where appropriate) the restoration of indigenous vegetation cover on the Covenant Area; and
 - Prevention of subdivision (within the meaning of the Resource Management Act 1991 or any other equivalent replacement legislation) of the Covenant Area.



Figure 2: Northern Gully

28. The physical attributes of this block are described as a steep sided gully with a stream of approximately 350 metres at the bottom. The northern corner adjoins the Belmont Quarry and then continues ascending into the Belmont Regional Park. The groundcover comprises regenerating native vegetation with mature tawa and kāmahī forest which merges into broadleaf forest along the gully floor.

29. The southern-western margins are more reflective of regenerating native and exotic vegetation on historic overburden. Existing vehicle access links to the stream.
30. Mr Head notes the following additional physical attributes:¹⁰
- a. There is an area directly adjacent to the Belmont Regional Park which includes 'good quality' kāmahī and pukatea along the margins of several tributaries.
 - b. The land parcel includes landform modifications including the dumping of cleanfill material. In addition, approximately one third of the area includes a channelised watercourse / modified stream.
 - c. There is a small area of natural regeneration along the central western edge of the 'Cottle Block' adjacent to neighbouring private property.
 - d. Part of the topography has been reshaped and replanted due to quarrying activity.
31. The Applicant describes the vegetation in this site as including regenerating (seral) broadleaf forest, mature tawa forest remnants, and riparian vegetation that provides important stream cover. The forest is primarily dominated by tawa and pukatea, with kāmahī, rewarewa, pigeonwood and māhoe forming parts of the canopy and understorey. Notably large pigeonwood trees and some miro and historic rātā are present. The northwestern plateau is the most intact and mature forest area, with minimal herbivore impact. Surrounding areas include regenerating vegetation and some invasive species at the boundaries. Stream edges are well vegetated, ensuring good riparian cover. The Applicant notes the presence of ramarama (a nationally critical threatened species), with three specimens recorded during a 2025 survey. The southern section is regenerating although there is a mature tawa patch.
32. Apart from the established forest on the north side of the watercourse, the remainder of the block is regenerating native bush. The southern portion has been subject to overburden placement and subsequent rehabilitation, including native planting.
33. Mr Ward describes the QEII covenanted portion as containing some quality forest including mature pukatea, miro and tawa, although the understorey is hollow due to recruitment failure and pest management is required. The forest type and age is consistent with the neighbouring Belmont Regional Park. The stream has good riparian vegetation and settled edges.
34. The Northern Gully has two main perennial streams, with the larger piped under the quarry to the Hutt River and the other leading into the Southern Gully and then down into Hutt River after traversing two waterfalls.
35. In terms of slope stability, the parcel is partly unmodified natural slopes, and rehabilitated overburden slopes that have been engineered to achieve acceptable levels of stability.

Southern Gully

36. Southern Gully is 3.9 hectares and is contiguous with the Northern Gully block. It is a lower vegetated gully that separates modified terraces that are gradually revegetating overburden and a rural lifestyle development established along Liverton Road. The site is owned by Winstone Aggregates.

¹⁰ Landscape statement of advice, Jeremy Head, May 2026 at page 11



Figure 3: Southern Gully

37. There are a number of notations on this block including:
 - a. Right of way, telecoms, and electricity supply which burdens Lot 4 DP 322126 and benefits Lot 5 DP 322126;
 - b. Easements in Gross (in favour of Fletcher). This is an easement / private land covenant in favour of Fletcher (Grantee) over Lots 4, 5 and 100 DP 322126 (Grantor) for the emission of noise, vibration, earthworks and dust; and
 - c. Consent notice which affects future buildings and use of the site (matters such as water supply, wastewater and stormwater drainage, grazing of pigs and goats, building consent plan specifications). This does not affect the use of the land for quarrying activities or conservation activities.

38. The Southern Gully comprises both sides of a 225 m stream that drains from the headwaters below Kaitangata Crescent. The southern parts of the block are rehabilitated overburden with visible benching. The topography rises 50 metres with the low point being the stream, and the high point located in the north-eastern corner. The vegetation is later seral broadleaf with emergent tōtara and rimu, although the overburden area is more sparsely vegetated. A 0.27 ha wetland contains a mix of indigenous and exotic plant species but is dominated by sedges.

39. This block is described as late-stage, mid-successional native vegetation, with some rimu and tōtara in the northeast and riparian vegetation near the stream. Mr Head also describes the site as being clothed in regenerating native (largely māhoe) and exotic vegetation cover including blackberry and gorse, which has overgrown the area in places. Aside from a

wetland area, the Southern Gully consists largely of early- to mid-stage regenerating forest. The stream shows signs of being a high-quality aquatic habitat. A number of wetland species have been planted, and the natural inland wetland occupies an area of 0.27 ha and is regenerating. The gully contains a 225 m section of an unnamed stream, which eventually joins the Hutt River after traversing a series of waterfalls.

40. The stream in the Southern Gully was not surveyed by the Applicant for fauna but visual observations indicate it has good instream aquatic habitat quality, a mixed hard-substrate base under forest canopy, and at least banded kōkopu. Through the lower wetland, it is more entrenched and narrower, with a dense sedge and grass cover.
41. Access into this block is from the road frontage between 174 and 184 Liverton Road by way of a benched access track. The construction of this section of overburden was completed in 2015 and no instability has been noted since. The stability of the slopes has been confirmed by a geotechnical assessment.

Firth Block

42. This elevated area is located to the east of the Belmont Quarry and is a roughly triangular piece of land wedged between the quarry and the Western Hutt Road. It covers an area of 9.6 hectares and the entire block is subject to a QEII covenant. The objectives of this covenant are the same as the QEII covenant applying to the Northern Gully.



Figure 4: Firth Block

43. The physical attributes of this block are described as being part of the steep and convoluted slopes of the Western Escarpment. The elevation ranges between 32-180 m above sea level, with 130 m stream length passing through the northeast corner. Previous excavation has led to the presence of terraces in the lower portions.
44. This block is part of the Western Escarpment and contributes a prominent slope that is visible from urban areas. Views from the Hutt Valley show an area with little modification and a prominent green backdrop.
45. The Applicant describes the prominent ridge and steep, previously quarried south-facing slopes as supporting early- to mid-stage regenerating broadleaf scrub. More mature tawa forest containing a mix of canopy species, including hīnau, pukatea, rewarewa, kahikatea, nīkau, black beech and some young rimu, miro and tōtara seedlings located at the head of the south-draining gully.
46. Upslope vegetation includes mānuka over kiokio, while downslope areas transition to rewarewa–broadleaf forest. Surrounding steep slopes are a mosaic of later-stage broadleaf and tree fern communities extending toward a pond/lake area. Eastern slopes are mid-seral and notable for a high presence of māpou.
47. Small patches of mānuka occur on upper slopes and established native forest is located at the head of the central gully. A farm pond and associated wetland are located near the boundary with the proposed overburden area. Waterways appear not to have been modified in recent times.
48. It has an Open Space Covenant 5-07-755 (Covenant 10476608.1) recorded on the title.
49. In terms of the geotechnical characteristics, remnant quarry batters are part of this block which were completed over 50 years ago. The geotechnical assessment recommends a setback in one area to ensure a low risk of instability.

Dry Creek

50. Dry Creek is a U-shaped area comprising 7.94 hectares in area. It is located around the edge of a retired clean fill face and includes areas that were not subject to quarrying or clean fill activities. In some places the slopes are very steep, particularly where these were the former batter slopes. Based on the report undertaken by Baseline Geotechnical Ltd (2025), there is a slope stability hazard in Dry Creek but it is limited to very localised areas of old access roads,



Figure 5: Dry Creek

51. The physical attributes of this block are dominated by the terraced benches from the former quarry. It is very steep in places, rising from 50 to 180 metres above sea level, with the highest point being a vegetated spur running along the northwest boundary. A stream remains culverted through this block. National Grid transmission lines cross the upper corner of Dry Creek.
52. Vegetation is regenerating with areas of early and late seral broadleaved forest. The faces of the former cleanfill site are more modified and less vegetated.
53. The eastern and northern boundaries contain advanced regenerating broadleaf forest with emergent rewarewa above a diverse understorey of ferns, seedlings and species typical of mature forest succession. Epiphytes, vines and a well-developed bryophyte layer are present, especially in wetter areas.
54. The southwestern boundary supports varied vegetation, including wet seral forest and mixed regenerating communities with species such as māhoe, pigeonwood, mānuka, and karaka, alongside fern-dominated understories.
55. The western slopes are rocky and dominated by regenerating native species, while earlier-stage vegetation elsewhere is patchy and often includes invasive exotics (e.g. gorse, buddleia, wattle), mixed with developing native species like karamu, māhoe, and kānuka.
56. Mr Head notes that this site is very weedy but includes some natural regeneration of native plant species through the weed cover. The central area (outside the land exchange Application) is essentially fully clothed in weed cover.

57. 507 m of waterways are present although it is unknown if ephemeral, intermittent or perennial. Waterways have been modified in the Dry Creek block downstream of the proposed give site.
58. It is subject to the following notations on the title:
- a. A Right of Way which favours the recreation reserve land owned by the Crown and is used for the Dry Creek loop track. This easement will become redundant if the area comes into Crown ownership.
 - b. Gazette notice taking 1,203 m² from the front of the block for roading purposes.
59. The block is contiguous with regenerating native bush that connects to the Regional Park.

2.3 Improvements offered

60. The Application initially offered the following improvements as part of the land exchange:¹¹

Northern Gully:

- Pest animal control for 5 years
- Weed control for 5 years

Southern Gully:

- Pest animal control for 5 years
- Weed control for 5 years
- Establishment of 200 swamp maire > 2m in height

Dry Creek:

- Supplementary planting of indigenous species for 2 years of an area of 0.8 ha with approximately 7,000 plants
- Maintenance of planting for 4 years to achieve 90% establishment
- Weed control

Firth Block:

- Planting of approximately 1,000 kāmahī and 1,000 *Olearia paniculata* and kānuka along the quarry edge. This is to be planted within a year.
- Maintenance of planting for 4 years to achieve 90% establishment
- Rat trapping

61. An Ecological Restoration Plan is proposed in response to mana whenua feedback to integrate mātauranga Māori with ecological science to support Taranaki Whānui to strengthen their relationship and whakapapa to the area. This approach is intended to align pest plant management, indigenous restoration, wānanga and educational activities.
62. In response to the Draft Land Exchange Report, the improvements offered through the conditions were amended with Conditions Package A and B. This is discussed further in section 5.7 and 9.

¹¹ Land Exchange Report, Wikaira Consulting dated December 2025, page 79

3 Invitations to comment on the application

63. On 28 January 2026 the Director-General of Conservation invited comments on the proposed land exchange from the parties specified in section 35(1) of the Act. The list of those invited to comment is included in [Appendix 1](#). Responses to that invitation to comment are included in [Appendix 1](#), summarised in [Appendix 2](#), and discussed further in [section 8.1](#) of this report.
64. It should be noted that the table in [Appendix 2](#) is a summary of comments received and readers should refer to the original responses contained in Appendix 1 for further detail.

4 Draft report

65. On 29 May 2026 the Director-General of Conservation invited comments on the draft report from the Applicant and the parties who provided comments under section 35(1), pursuant to section 35(5). Responses to the invitation to comment on the draft report are included in [Appendix 3](#) and discussed further in [section 8.2](#) of this report. Where comments on the draft report have identified amendments warranted to the content of the draft report, these changes have been made where appropriate.
66. [Appendix 3](#) contains a summary of the comments received. It should be noted that the table in [Appendix 3](#) is a summary only and the original responses contained on the EPA website should be considered as the primary source.

5 Section 35(3)(a) requirements

67. This section of the report addresses the requirements of section 35(3)(a) which requires the matters specified in clause 26 of Schedule 6 be included. There are two key requirements set out in clause 26:
- information to address the matters in clause 29(1)(a)(ii)-(vi) and (b) (which sets out matters the Panel must take into account or may consider when considering a land exchange), including the information specified in clause 26(1)(a) to (g); and
 - any conditions of those specified under section 78 that the Panel must impose in accordance with clause 33.
68. These are discussed in turn below.
69. In addition, clause 26(3) requires that where Crown-owned reserve managed by someone other than the Department is proposed to be exchanged, the manager of the reserve must be consulted in the preparation of the report. The Applicant undertook several pre-lodgement meetings with Greater Wellington Regional Council since early 2024. The issues raised by Greater Wellington Regional Council relating to the proposed exchange include:¹²
- a. Impact on recreation values: concerns the land exchange proposal would remove existing recreation tracks disrupting walking and biking connections within this part of the regional park.
 - b. Ecological values at Dry Creek: concern that parts of the Dry Creek site had low ecological value due to historic quarry and clean fill use.
 - c. Impact on natural wetland and swamp maire: concern that the footprint included a significant natural wetland and a mature population of threatened swamp maire.

¹² Consultation Report, Wikaira Consulting, dated December 2025, page 4

- d. Whether the exchange was fair value, given that it included low quality Dry Creek land.
 - e. The possibility of new tracks connecting the land being acquired by the Crown as part of the proposed exchange to the existing track network in the Belmont Regional Park. Winstone explored both Northern Gully Track and Dry Creek Track options. Greater Wellington Regional Council did not want any new tracks, although the reasons are not recorded in the consultation record.
70. In its communication to DOC dated 4 December 2025, Greater Wellington Regional Council explained that it is neutral on the proposed land exchange proposal.
71. Greater Wellington Regional Council was invited to comment on the land exchange application. The comments received from Greater Wellington Regional Council on 13 February 2026 set out that it had no further comments specific to the land exchange beyond those it provided in the pre-application stage. The comments received from Greater Wellington at that point included a report outlining summary of land on each site held by Greater Wellington Regional Council including
- a. Land area of each parcel.
 - b. Area of DOC-Give.
 - c. The DOC-Give falls within the Belmont Dry Creek Key Native Ecosystem which is managed as part of the Greater Wellington Key Native Ecosystem Programme. This programme provides long term funding for weed control and pest animal control.
 - d. Identification of the QEII covenanted areas.
 - e. Terrestrial and freshwater information held by Greater Wellington including previous landuses, waterways, physical environment and management activities.
 - f. Vegetation maps surveyed by Boffa Miskell in 2017.
 - g. An email from Friends of the Belmont Regional Park outlining its concerns with the proposed land exchange. This includes the presence of swamp maire, ramarama, *Coprosma rubra* and the rich diversity of plants present in the DOC-Give site. The email considered that the proposed land exchange does not offer any ecological gain but instead ecological loss.
 - h. An email from the Wellington Botanical Society outlining its concerns with the proposed land exchange. This includes the presence of swamp maire, *Coprosma rubra*, *Lophomyrtus bullata* and a large proportion of Category 1 threatened environment.
72. Various information has been sought from and provided by Greater Wellington in the preparation of this report. Examples include an estimation of costs associated with maintaining the DOC-Give site.
73. While Greater Wellington was invited to comment on the draft Land exchange report, no comments were received.

Relevance of QEII covenant affecting some of the land proposed for exchange

74. The land exchange application was lodged on 10 December 2025 which was prior to the amendments to the FTAA made by the Fast-track Approvals Amendment Act 2025 (**FTAAA**) coming into force.
75. While this report is prepared under the provisions of the FTAA prior to amendment, the Department considers the correct legal position is the Panel's decision on any substantive application for approvals by Winstone will be required to be made under the provisions as

amended by the FTAAA. This is addressed in Appendix 5 (legal memorandum dated 29 May 2026).

76. Of particular relevance is the new clause 29(2A) in Schedule 6 inserted by ss 55(12) of the FTAAA. This requires the Panel, in considering the conservation values of the land to be acquired by the Crown, to discount the extent to which the conservation values of that land are affected by the QEII covenant on the title for that land:
- (2A) When considering the conservation values of land to be acquired by the Crown, for the purpose of forming its view under sub clause (2), the Panel must discount the extent to which the conservation values of that land are affected by anything registered or noted for conservation purposes on the record of title for that land.*
77. The significance of this to the Belmont land exchange application is that 2.87 ha within the Northern Gully and the entirety of the 9.6 ha Firth Block are subject to a QEII conservation covenant. The Open Space Covenant was registered in 2016 between Fletcher and the QEII National Trust.
78. Open Space Covenant 5-07-755 is held in Covenant 10476608.1 pursuant to Section 22 of the Queen Elizabeth the Second National Trust Act 1977 (QEII Act 1977) dated 23/06/2016. This Covenant applies to WN31B/39 and WN31D/969. The purpose is to protect, maintain and enhance the Open Space Values of the covenant area. The objectives of the covenant are to:
- a. Protect and enhance the natural character with regard to the indigenous flora and fauna;
 - b. Maintain and enhance the landscape value;
 - c. Encourage the restoration of indigenous vegetation cover; and
 - d. Prevent subdivision.
79. The covenant applies to three mapped areas (Areas A, B, C) within DP 494230. The covenant restricts the use, development and modification of the land except as permitted under its terms.
80. As noted above, the Department considers the Panel's consideration of the land exchange must be based on the amended version of the FTAA including new clause 29(2A) of Schedule 6. However, it is also acknowledged that there are opposing views, including by Winstone, that the Panel is bound by the law as it was when the land exchange application was lodged, i.e. pre-amendment.
81. If the Panel considers the post-amendment exchange provisions of the FTAA apply, when considering the conservation values of the land to be acquired by the Crown, it must discount the extent to which those conservation values are affected by the QEII covenant. This is addressed further in Legal memorandum # 2 dated 7 July 2026 which is [Appendix 6](#) to this report, and in section 9 as Winstone have offered conditions on the basis the Panel might accept it needs to apply the new law.
82. Preparation of this report by the Department is under the law as it stood when the Application was lodged. Which version of the FTAA applies in its decision making on the substantive land exchange application is something the Panel will need to determine.
83. DOC has assessed the conservation values of the DOC-Get sites including the QEII covenanted land. In DOC's view this is within the scope of the FTAA as it applied pre-amendment. In addition (and as discussed in section 9) the technical experts have assessed the values if the QEII sites were to be discounted.

84. The Panel can also request further information from the Department in the event it considers that the new law applies, and/or there is insufficient information on which to make an informed decision on the exchange proposed (referring to ss 67 and 68 of the FTAA).

5.1 Conservation values of the land (cl 26(1)(a))

85. A Panel cannot approve a land exchange unless satisfied that the exchange (taking into account any money that may be received and any conditions that may be imposed) will:
1. Enhance the conservation values of land managed by the Department (the former test in cl 29(2), Sch 6).
- OR
2. Enhance the conservation values of conservation areas and Crown-owned reserves considered as a whole (the new test in cl 29(2), Sch 6).
86. When considering a land exchange, the Panel must take into account the conservation values of the land concerned, including how threatened or abundant they are, and a comparative assessment of the values that relate to each area of land concerned.
87. The FTAA requires the Department to consider the following criteria:
- (1) The report referred to in [section 35\(3\)](#) must include information to address the matters in [clause 29\(1\)\(a\)\(ii\) to \(vi\) and \(b\)](#), including—*
- (a) the conservation values of the land concerned, including how threatened or abundant they are, and a comparative assessment of the values that relate to each area of land concerned; and*
 - (b) the financial implications for the Crown of the land exchange; and*
 - (c) 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 or a Crown-owned reserve; and*
 - (d) the legal and financial liabilities, and health and safety risks, for the Crown associated with the land exchange; and*
 - (e) statements of general policy approved under [section 17B](#) or [17C](#) of the Conservation Act 1987; and*
 - (f) any conservation management strategy, conservation management plan, or reserve management plan that has been co-authored, authored, or approved by a Treaty settlement entity; and*
 - (g) any conditions that should be imposed in accordance with [clause 31](#) or [32](#) or [section 84](#).*
88. This report provides the necessary elements for the Panel to make a conclusion on whether conservation values will be enhanced (and is sufficient for making a decision regardless of which test in the Act applies).
89. Conservation values are comprised of biodiversity values, freshwater values, recreational values, landscape and cultural and heritage values (including natural, scenic, archaeological, historical, biological, geological, scientific, educational, or community values that contribute to

these). Accordingly, experts in the following areas provided an analysis of the conservation values of each piece of land:

- a. botany;
- b. heritage;
- c. terrestrial fauna;
- d. recreation;
- e. freshwater ecology; and
- f. landscape.

90. Each subject field was assessed by a relevant expert, informed by a combination of site visit(s), research and review of the material provided by the Applicant. Criteria were developed to enable components of each block to be considered. These criteria differ across disciplines as they are appropriate to the subject field and are in line with the relevant industry guidelines or practices. Each expert has then undertaken an assessment of the DOC-Give site and each of the four DOC-Get sites.
91. A sliding spectrum of scoring was used, ranging from low to high. The value assigned to each criterion for each area of land has then been documented in a matrix for easy reference. The rating for each value is directly derived from the analysis of each expert's report. This allows not only direct comparison of the conservation values of the DOC-Get against those of the DOC-Give sites, but also to see the analysis which sits behind the value attributed to it. As the Applicant is proposing improvements such as mammalian pest control, weed control and propagation of swamp maire, the assessment of conservation values has undertaken two assessments – without the improvements proffered in the first instance, and secondly taking those measures into account.
92. The conservation values for each subject field and for each area of land have been directly imported from the technical reports in [Appendix 4](#) (and any updates in response to the comments on the Draft Land Exchange Report in [Appendix 3](#) into this report to allow comparison). The benefit of a comparative analysis across each of the DOC-Get areas rather than an amalgamated value is that it allows the identification of the specific locations and subject field where the land exchange will result in a net gain, net loss or no change in conservation values. While the Applicant supports a single amalgamated overall value for the DOC-Get sites, a concern with this approach is that it does not allow the Expert Consenting Panel to adequately consider the individual values and also determine whether weighting is appropriate; the Panel may consider conservation values for one subject field to be more critical than others. Notwithstanding this, the ratings for each DOC-Give site have been amalgamated (as well as amalgamating the values for all the DOC-Give sites) but should only be considered indicative for comparative purposes. This exercise has assumed that each subject field and each DOC-Give site has an equal weighting. The Expert Consenting Panel may wish to consider whether certain values or specific DOC-Give sites should carry a higher weighting than others.
93. The Applicant observed that the subject fields (and therefore this report) assess a number of different scenarios based on differing assumptions regarding QEII covenant land, proposed enhancement and future conditions. Consequently, the Applicant considered that it does not identify a single basis upon which the exchange should ultimately be assessed.¹³ This report considers carefully the statutory criteria for advising the Expert Consenting Panel. The report

¹³ Response to draft DOC report memorandum, J. Wikaira dated 15 June 2026 at [38].

provides the Panel with a comprehensive assessment which is sufficiently flexible to enable robust decision-making.

94. Having said that, there are a number of variables that the report must address. First, it is acknowledged there is uncertainty as to which version of the FTAA the Panel will apply in its decision making (and therefore whether the conservation values of the QEII covenanted land should be considered). This report ensures the Panel has sufficient information on which to decide regardless of the law it applies. Second, there are now multiple versions of enhancements proffered by the Applicant.¹⁴ Thirdly there are four different versions of conditions.¹⁵ And finally, how exactly the discount should be applied if the more recent amendment to the FTAA applies.

5.1.1 Terrestrial fauna values

95. The Applicant's assessments of biodiversity values are contained in the following reports:
- a. Overview of Ecological Values, BlueGreen Ecology Ltd dated 26 February 2025;
 - b. Lizard Assessment, Blueprint Ecology dated 3 December 2025.
96. A review of the Applicant's assessment was undertaken for DOC by Dr Rhys Burns for terrestrial fauna ([Appendix 4B](#)). Birds, lizards and bats were the main focus of the Applicant's reports and the species most likely to be affected by the proposed changes to land use. Dr Burns' review notes that mobile species such as birds and bats (if present) would be expected to use all sites similarly, but can be influenced by habitat quality. Less mobile species such as lizards are expected to mainly be influenced by habitat quality. In both cases, animal pest management may increase their survival and breeding success.

Lizards

97. Lizard surveys were undertaken in the DOC-Give site which found four grass skinks (*Oligosoma polychroma*; At Risk - Declining and three ngahere geckos (Mokopirirakau "Southern North Island"; At Risk – Declining). No lizard surveys were undertaken in the DOC-Get sites due to very steep terrain and dense vegetation. This makes it difficult to compare across the sites. In the absence of numbers of lizards, the Applicant's assessment focused on the habitat type and inferred the suitability of each for lizards. Dr Burns largely agrees with the assumption in the Applicant's assessment that lizard diversity and density could have some correlation to habitat maturity and complexity. It is expected that northern grass skink and/or a low number of forest lizard species would be recorded at each site, with possible presence of barking gecko or ngahere gecko occurring in high-quality habitat "hot spots".
98. The Applicant's report considers that DOC would receive a significant increase in lizard habitat extent and quality as part of the proposed land exchange.¹⁶ It also noted that native planting, weed control and targeted rat control will provide a considerable improvement to lizard habitats over the medium- to long-term.

¹⁴ As outlined in the Land Exchange Report dated 7 December 2025 and more recently the Response to draft DOC report memorandum dated 15 June 2026

¹⁵ The Applicant's proffered conditions as outlined in the Land Exchange Report dated 7 December 2025; a suggested set of conditions developed by DOC the Draft report on land exchange dated 29 May 2026; Condition Sets A and B as set out in the Response to draft DOC report memorandum dated 15 June 2026

¹⁶ Lizard Assessment, Blueprint Ecology dated 3 December 2025 at page 12.



Figure 6: Quality of habitat for lizards (high habitat quality – red, moderate habitat quality – orange, low habitat quality – green) *Source: Lizard Assessment, Blueprint Ecology*

99. The questions raised by Dr Burns about the adequacy of the 2025 lizard survey methodology was addressed by a memorandum prepared by Mr Tony Payne.¹⁷ Mr Payne addressed the omission of closed-cell foam covers as a detection method for lizards but considered it did not meaningfully diminish the survey's detection capability. He considered that the 2025 Blueprint Ecology survey was appropriate, targeted, and well-suited to the habitat and species present. While additional gecko detections might have been achieved through closed-cell foam covers deployment, he considered this would have no bearing on the conclusions of the habitat assessment.

Avifauna

100. The Applicant derived data from field surveys, acoustic monitoring devices and supplementary datasets from the wider landscape. The majority of species recorded in the area are native, Not Threatened and primarily associated with native forests and shrublands (e.g. kereru, fantail, silvereye, grey warbler, ruru, tūī, and bellbird).¹⁸ The Dry Creek site is a known habitat for at least one pair of breeding New Zealand bush falcon, which is classified as both nationally and regionally Threatened. The DOC-Give site is located within an eco-corridor. The greatest number of species were recorded at the lake, and the bioacoustics recorders picked up two Threatened species (Caspian tern and long-tailed cuckoo) and one At Risk species (North Island robin) at that same location.
101. Dr Burns noted that it is not clear whether the 'mānuka' site (AR4) in the DOC-Give site (described as Mānuka Mixed Broadleaf Forest) was analysed for bird calls (noting the contradiction between the text stating it had not been analysed and Table 10 which implies it was). He considers the AR4 site represents more mature forest than the AR2 site that was

¹⁷ Response to DOC report – Lizards, Mr T Payne dated 12 June 2026.

¹⁸ Overview of Ecological Values, BlueGreen Ecology Ltd dated 26 February 2025 at section 7.1.

analysed by the Applicant, which would have the effect of understating the avifauna values because AR4 is likely to have a higher density of native birds.¹⁹

102. In terms of avifauna, Dr Burns considers the areas of tawa-kāmahi forest, hīnau-kāmahi forest, pukatea-rewarewa forest and pukatea-tawa forest in the Northern Gully site and the tawa-kāmahi forest in the Firth Block should offer better quality native forest bird habitat than most areas present in the DOC-Give site.²⁰ He considers that the Southern Gully and Dry Creek are in early succession or dominated by exotic species and weeds meaning lower quality for native forest birds.
103. He agrees with the statement that the forest bird species are mobile and so if present in one area, are likely to also be present in the other forested areas.²¹ The exception to this are territorial robins, but Dr Burns is sceptical about their presence.

Bats

104. While monitoring was undertaken for the presence of bats over three weeks, no bats were detected and there was no evidence of foraging.²²
105. Dr Burns observed that information was not provided as to whether the conditions were optimal for bat activity (and therefore detection). It is therefore not known whether the data can be completely relied upon.²³ In response, Dr Hazel Burrridge provided further detail on the acoustic bat survey.²⁴

Invertebrates

106. Invertebrate monitoring was not undertaken by the Applicant, but Dr Burns notes there are no known threatened invertebrate species present at the site. He noted that the brightly coloured endemic moth *Macarostola miniella* (At Risk – Declining) is often associated with swamp maire meaning these moths may be present.²⁵ As swamp maire is only found in the DOC-Give site and not in any of the other proposed DOC-Get areas, Dr Burns considers the terrestrial invertebrate values in the DOC-Give to be higher than the other lands available for the proposed land exchange due to the potential presence of this moth.²⁶

Pest management

107. Dr Burns outlined the benefits of pest management. Because the DOC-Give site is part of the Belmont Regional Park, it already benefits from pest control. While pest management is not being currently carried out at the DOC-Get sites, the number of successful nests and quality of food resources will increase with future pest management. He noted the high perimeter to area ratio for the DOC-Get sites, making it more difficult to protect from pest animal incursions, and the elongated nature of the land making it less likely to achieve effective pest control that can benefit native fauna. These matters were addressed by Dr Payne. In terms of the effectiveness of ground-based pest control, he considered that steep terrain and dense vegetation is a shared characteristic between DOC-Give and DOC-Get sites.
108. Dr Burns noted errors in the Applicant's calculations of habitat areas, meaning they cannot be relied upon. He noted too that the ecological assessment includes a fifth block (Cottle Block) that is not mapped, however this appears to be a subset of the Northern Gully.

¹⁹ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [28].

²⁰ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [30].

²¹ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [39].

²² Overview of Ecological Values, BlueGreen Ecology Ltd dated 26 February 2025 at section 7.2.

²³ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [47].

²⁴ Response memorandum – bats, Dr H. Burrridge dated 12 June 2026

²⁵ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [49].

²⁶ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [51].

Overall

109. The Applicant's assessment considers that both the DOC-Give and the DOC-Get sites are comparable habitat types, although the DOC-Get sites cover more land area and includes patches of more advanced native regeneration and retained mature forest. Other key elements in terms of fauna are:²⁷
- a. Both areas have a small number of rare taxa (lizards and birds).
 - b. Both DOC-Give and DOC-Get have similar faunal habitats, although the DOC-Get sites have more mature habitat.
110. The Applicant's overall assessment is that the land proposed for addition to the conservation estate (DOC-Get) is greater in area and holds higher ecological value than the land to be exchanged (DOC-Give).²⁸ The Applicant initially did not split out its assessment of the fauna and flora values however, instead amalgamating them. This approach was modified in the response to the Draft Land Exchange Report with conservation values set out for:
- a. Ecology (habitat);
 - b. Ecology (birds);
 - c. Ecology (bats); and
 - d. Ecology (lizards).
111. Dr Burns concludes the DOC-Get sites to be of slightly higher value to terrestrial fauna than the current DOC-Give. This is mainly due to greater maturity, complexity and area of habitat. He considers the values for terrestrial fauna to be Moderate for the DOC-Give site. He considers the overall amalgamated terrestrial fauna value of the DOC-Get sites to be Moderate-High.²⁹ This gives a higher value than if the sites are considered individually.
112. The key area where the values are higher for the DOC-Get sites is representativeness, diversity and rarity and distinctiveness, although Dry Creek and Southern Gully both have lower values across all criteria than the DOC-Give site. More mature habitats enable a greater diversity and density of birds and lizards.
113. Dr Burns undertook an assessment of the terrestrial fauna values if the improvements offered by the Applicant are implemented, and he initially assumed five years for the duration of the interventions. This results in an increase in the values for the Firth Block and Southern Gully. He considers the Firth Block will benefit from the rat control offered and it is likely that wetland birds may benefit from this pest control. As rat control alone is offered, and only seasonally (to benefit bird nesting), accompanying benefits to lizards will be low, as lizards can be vulnerable to rat predation throughout the year. Indigenous revegetation measures will have little impact on bird values but may marginally benefit lizards within five years.³⁰
114. Mr Payne responded to this by stating that seasonal rat trapping alone will deliver limited direct benefit to lizard populations. Therefore, the land exchange does not rely on pest control delivering lizard population benefits at the DOC-Get sites but instead rests on the substantial net-gain in lizard habitat extent and quality that DOC receives as a consequence of the exchange. The DOC-Get sites provide an increase of 14.36 ha of lizard habitat overall and 3.46 ha of high-quality habitat.

²⁷ Overview of Ecological Values, BlueGreen Ecology Ltd dated 26 February 2025 at page 1.

²⁸ Overview of Ecological Values, BlueGreen Ecology Ltd dated 26 February 2025 at page 1.

²⁹ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [56].

³⁰ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [62-64].

115. Dr Burns considers that the possum control for the Southern Gully should cause a marginal increase in food resources for birds, hence the small uplift in values.³¹ Dr Burns considers the amalgamated values for terrestrial fauna including the improvements offered by the Applicant are Moderate-High.³²
116. Dr Burns considered Conditions Package A but it did not cause him to change the ranking of any of the sites, or the overall assessment.

DOC's Overall value ranking – Terrestrial fauna		
		Assessment including the proffered improvements
DOC-Give site:	Moderate	N/A
DOC-Get sites:		
Northern Gully	Moderate	Moderate
Firth Block	Moderate-Low	Moderate
Dry Creek	Low	Low
Southern Gully	Low	Low to Moderate-Low
Amalgamated (all Get sites)	Moderate-High	Moderate-High

Table 1: Conservation values for terrestrial fauna

5.1.2 Flora values

117. BlueGreen Ecology undertook an ecological assessment for the Applicant. This was reviewed by Matt Ward who provided advice to DOC ([Appendix 4A](#)). The vegetation composition of each of the sites is very different.

DOC-Give

118. The Applicant acknowledges there are a range of values (Low to High) associated with the age and extent of seral development, noting that there are gaps and missing taxa and a lack of evidence of later seral stage species. Several rare taxa are present in low abundance, often as young specimens, suggesting the area has potential for these species (e.g. swamp maire, ramarama). The open central exotic pine and grassland ridge is identified as being currently of Negligible value. The rest of the areas (later seral broadleaf and mānuka-kānuka scrub) are assessed as Moderate ecological value (comprising one high and the rest moderate or lower).³³
119. Mr Ward similarly considers values of the DOC-Give site range from Moderate for ecological context and representativeness, to High for rarity and distinctiveness. Overall, he considers the indigenous flora value for the DOC-Give site to be Moderate-High.³⁴

Northern Gully

120. Mr Ward noted that the northeastern section has a somewhat similar mature forest to the QEII covenanted area although it lacks species diversity. The western section is low value replanted overburden area. Mr Ward considered that this factor combined with the reshaping detracts from the overall value and natural features present and results in an overall Low value.

³¹ Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026 at [66].

³² Statement of advice on terrestrial ecology, Rhys Burns dated 15 April 2026, page 24].

³³ Ecological Assessment, BlueGreen Ecology dated October 2025 at page 65.

³⁴ Statement of advice – botanical and ecological restoration, Matt Ward dated April 2026, page 10

121. This differs from the Applicant's assessment which rates the overall indigenous flora value as High. This is due to its more mature canopy, threatened regional habitat type, diversity of types and its functional role in stream protection.³⁵

Southern Gully

122. The Applicant rated the rarity and distinctiveness as High due to the wetland, and the ecological context as High due to the connection this site provides between the northern tawa-kāmahi areas and the southwestern gully forest. These two elements increase the overall value to High.³⁶ This differs considerably from Mr Ward's overall indigenous flora value as Low-Moderate. Mr Ward ranked representativeness as Low-Moderate because it only has 33 of the 602 native plants listed in the Wellington Ecological District plant species list. The central wetland is overrun with blackberry. Mr Ward also ranked ecological context as Low-Moderate as it is bordered by privately owned farmland and a quarry, making it susceptible to edge effects. He notes that the wetland is not particularly natural and is lacking original or naturally regenerating vegetation. He ranked diversity and pattern and rarity and distinctiveness as Moderate.³⁷

Dry Creek

123. Mr Ward agrees with the description in the Applicant's report. In particular he noted the level of weed species and observed that it currently serves as a buffer between the central area of the former quarry which is very weedy.³⁸ He considered it would be an expensive liability for the management of the Belmont Regional Park due to the need to manage weeds.
124. The Applicant considers this site to have Low values³⁹, and this is consistent with Mr Ward's assessment.

Firth Block

125. Mr Ward agrees with the assessment in the Applicant's report and describes it as a regenerating ex-quarry face. He noted that one edge has integrity by being adjacent to the Belmont Regional Park. The assessments of overall values differ. The Applicant rating the Firth Block as having Moderate value with a range of developing seral broadleaf stages and one mature tawa.⁴⁰ Mr Ward rates the Firth Block as Moderate. The main area of disagreement being representativeness, which the Applicant assesses as High but Mr Ward assesses as Moderate.

Overall

126. Mr Ward considers that the amalgamated value of the DOC-Get sites is Low-Moderate.⁴¹
127. Mr Ward assessed the effect on values of the improvements offered. The key changes are in the values for Dry Creek which increases from Low to Low-Moderate, and Southern Gully which increases from Low-Moderate to Moderate. Mr Ward observes that for Dry Creek, the removal of the weed species will allow the vegetation to 'catch up' with the rest of the Belmont Regional Park which has ongoing weed and pest management. The recalibration will take time however.⁴²

³⁵ Ecological Assessment, BlueGreen Ecology dated October 2025 at page 40.

³⁶ Ecological Assessment, BlueGreen Ecology dated October 2025 at page 45.

³⁷ Statement of advice – botanical and ecological restoration, Matt Ward dated April 2026, page 27

³⁸ Statement of advice – botanical and ecological restoration, Matt Ward dated April 2026, page 15

³⁹ Ecological Assessment, BlueGreen Ecology dated October 2025 at page 50.

⁴⁰ Ecological Assessment, BlueGreen Ecology dated October 2025 at page 55.

⁴¹ Statement of advice – botanical and ecological restoration, Matt Ward dated April 2026, page 10

⁴² Statement of advice – botanical and ecological restoration, Matt Ward dated April 2026, page 15

128. With regards to the improvements offered for the Southern Gully, Mr Ward considers that the removal of weeds will enable natural buffering and increase the resilience of the edges. If this were to remain weed free in the long term (25 years) it would be measurably improved.⁴³ He considers that the amalgamated values increase to Moderate with the successful implementation of the improvements offered by the Applicant.⁴⁴
129. Dr Keesing considered that Mr Ward had under stated the conservation of the DOC-Give area while undervaluing the DOC-Get blocks. Mr Ward provided further detail on how he came to each rating and increased the rating of diversity and pattern to Moderate for the Firth Block, which increased its overall rating.

DOC's Overall value ranking – Flora		
		Assessment including the proffered improvements
DOC-Give site:	Moderate - High	N/A
DOC-Get sites:		
Northern Gully	Low-Moderate	Moderate
Firth Block	Moderate	Moderate
Dry Creek	Low	Low-Moderate
Southern Gully	Low-Moderate	Moderate
Amalgamated (all Get sites)	Low-Moderate	Moderate

Table 2: Conservation values for flora

5.1.3 Freshwater values

130. BlueGreen Ecology addresses benthic macroinvertebrates, habitat and the presence of some fish species in its ecological assessment, while the hydrology of the sites is addressed in the hydrological analysis undertaken by Landscape Dynamics Limited (December 2025). The supplementary information provided by the Applicant expanded the information available to DOC.

DOC-Give site

131. Of the three short intermittent stream reaches in this area, the Applicant classifies the northern main stem as highly representative (despite the general absence of fish), with moderate rarity and distinctiveness, moderate in terms of pattern and diversity and with a moderate ecological context creating a high value aquatic system. The western branch ranks moderate for all factors and is considered, therefore, to be of Moderate aquatic habitat value.⁴⁵ The revision of the Applicant's values in response to the Draft Land Exchange Report resulted in a ranking of Low for ecology (freshwater) and noted the approximate length of aquatic habitat as 450 m.⁴⁶
132. Mr Jacob Williams undertook an assessment of freshwater values in his advice to DOC ([Appendix 4D](#)) and expresses some concerns about the location where the eDNA surveys were collected. He considers there may be additional species not captured because of the location of the sample points. He considers that the calculations for the area of the wetlands are not clear and the assessment of the species likely to be present will change depending

⁴³ Statement of advice – botanical and ecological restoration, Matt Ward dated April 2026, page 27

⁴⁴ Statement of advice – botanical and ecological restoration, Matt Ward dated April 2026, page 10

⁴⁵ Ecological Assessment, BlueGreen Ecology dated October 2025 at page 75.

⁴⁶ Response to DOC Freshwater Ecology, Dr V Keesing dated 15 June 2026 at [126]. This differs to stream length in the DOC-Give site stated in the planning response dated 15 June 2026 as 1,855 m in Table 28.

on the hydrology of the waterways at any given time. Dr Keesing responded by stating that the eDNA sampling locations provide an accurate representation of the values to be found there.⁴⁷

133. Mr Williams' review of the Applicant's survey / information provided indicates MCI scores of fair-good quality and excellent quality downstream of the site. Mr Williams categorised the rarity and distinctiveness as Medium-High because of the wetlands present in the site - less than 3% of wetlands remain in the Greater Wellington Region, and the presence of longfin eel (At Risk - Declining) and kōura likely present (seasonally). Modelled presence indicates that additional fish species such as banded kōkopu and redfin bully may be present. He rated the ecological context as Low-Medium for reasons including the presence of barriers to fish passage and that the DOC-Give site is a source of water for the tributaries of the Hutt River and downstream wetlands.⁴⁸

Northern Gully

134. Mr Williams notes the MCI score for some waterways in the Northern Gully are excellent quality. Surveys for fish recorded the presence of longfin eel (At Risk - Declining), shortfin eel (Not Threatened) and kōura (Not Threatened). Modelled fish presence indicates additional species (banded kōkopu, redfin bully) may be present. Mr Williams therefore rates the freshwater values for the sites as mostly Medium, with the exception of ecological context, which he rates Low-Medium because the connectivity for fish movement is marginal given the location of the catchment and known fish barriers downstream.⁴⁹ The Applicant's assessment notes that there are significant constraints to fish passage from the Hutt River due to the piping of the perennial stream and two waterfalls.

Southern Gully

135. The stream in the Southern Gully was surveyed through additional eDNA surveys and visual observations indicate it has good instream aquatic habitat quality, with a mixed hard-substrate base under forest canopy. The lower wetland is more entrenched, with a dense sedge and grass cover, and is likely good kōura habitat.⁵⁰
136. Mr Williams rates the representativeness as Medium-High due to the largely unmodified state of the waterways and the presence of a wetland, with a similar rating for rarity and distinctiveness. The eDNA survey provided by the Applicant indicates longfin eel (At Risk - Declining), shortfin eel (Not Threatened), and banded kōkopu (At-Risk - Naturally Uncommon) present, with the potential for shortjaw kōkopu (Threatened - Nationally Vulnerable) also being present (although Mr Williams does not agree as there are no records of shortjaw kōkopu in the Hutt River catchment). The MCI score for one waterway in the Southern Gully is good quality.

Dry Creek

137. Mr Williams notes that there is no quantitative survey undertaken for the Firth Block or the Dry Creek site, and no quantitative survey for the Dry Creek site. Due to the significant fish passage barriers downstream (piped stream) fish diversity is likely to be minimal but there is likely to be a good macroinvertebrate community similar to the other blocks in the un-piped sections of waterway. The modelling suggests banded kōkopu, longfin eel and redfin bully may be present.

⁴⁷ Response to DOC Freshwater Ecology, Dr V Keesing dated 15 June 2026 at [92-95]

⁴⁸ Freshwater statement of advice, Jacob Williams, April 2026 at page 3-4.

⁴⁹ Freshwater statement of advice, Jacob Williams, April 2026 at page 5.

⁵⁰ Ecological Assessment, BlueGreen Ecology dated October 2025 at page 78.

138. Mr Williams rated the Dry Creek values as all Low.⁵¹ While there is 507 m of waterways, they have mostly been heavily modified.

Firth Block

139. The presence of a wetland in this site results in a Medium-High rating for representativeness, rarity and distinctiveness by Mr Williams. Other criteria are rated as Low-Medium due to a good MCI score, absence of fish species and restricted connectivity for fish movement downstream.⁵²

Overall

140. Mr Williams acknowledges that ephemeral and intermittent waterways may have less value as habitat for fish species, however, they still provide seasonal habitat for fish species, habitat for macroinvertebrates, act as buffers for downstream reaches and can help regulate water flows. Mr Williams derived the following overall ecological value based on the highest ranking for each criteria.
141. Mr Williams assessed the amalgamated values as Medium-High based on a combination of factors including the values assessments, area of wetlands, length of waterways, quality of waterways, fish passage barriers etc rather than assigning a numeric values-based assessment.
142. Mr Williams assessed Conditions Package A proffered by the Applicant, but it did not change the freshwater values. Mr Williams concludes that there is no change in conservation values between DOC-Get and DOC-Give. This differs from Dr Keesing who considers that the exchange favours DOC, with DOC receiving more and better aquatic habitat than it releases.⁵³

DOC's overall value ranking – Freshwater		
		Assessment including the proffered improvements
DOC-Give site:	Medium-High	N/A
DOC-Get sites:		
Northern Gully	Medium	Medium
Firth Block	Medium-High	Medium-High
Dry Creek	Low	Low
Southern Gully	Medium-High	Medium-High

Table 3: Conservation values for freshwater ecology

5.1.4 Recreational values

143. The Applicant undertook an assessment of recreational values (Rob Greenaway & Associates). Other relevant assessment includes a Health and Safety report, Contaminated Land report, Climate Change and Natural Hazards.
144. Mr Mike Harbrow has undertaken an assessment of the recreational values in his advice to DOC in Appendix 4E.

⁵¹ Freshwater statement of advice, Jacob Williams, April 2026 at page 7.

⁵² Freshwater statement of advice, Jacob Williams, April 2026 at page 7-8.

⁵³ Response to DOC Freshwater Ecology, Dr V Keesing dated 15 June 2026 at [29]

145. The main recreation feature of the DOC-Give site is 400 m of 4WD track which forms an extended loop to the Buchanan Road Tramping Track. In addition to use as a walking and cycling track, the 4WD track also provides access to the National Grid support structures. Usage of Buchanan Road Tramping Track is estimated by the Applicant to be in the vicinity of 6,570 each year based on data captured by a visitor counter, of which 41% is estimated to use the 4WD track portion. Mr Harbrow had some concerns about the accuracy of this data given the methodology with which it was collected.
146. Mr Greenaway considered that loss of that portion of the 4WD track will not affect the use of any other tracks including the Buchanan Road Tramping Track, access to Boulder Hill or the Puke Ariki / Haywards Korokoro Traverse.⁵⁴



Figure 7: Relationship of the 4WD track (shown in pink) with the Buchanan Road Tramping Track

147. No recreation activities were recorded on the DOC-Give site and the recreation values beyond the track were considered to be 'insignificant' by the Applicant. This was based on the perceived lack of recreation activity beyond the formed track, although Mr Harbrow again had concerns about the collection of data and that it may not be representative.⁵⁵ Mr Greenaway responded that the data was cross-checked against other sources of data. He considered that those multiple sources are consistent in indicating that Buchanan Road and the adjacent DOC-Give land are relatively lightly used compared with the main park entrances and track corridors.⁵⁶

⁵⁴ Recreation Assessment, Rob Greenaway & Associates dated December 2025, page 13.

⁵⁵ Recreation statement of advice, Mike Harbrow dated April 2026 at [51].

⁵⁶ Memorandum on recreation, R. Greenaway dated 15 June 2025 at [9]

148. The assessment by Mr Harbrow notes that the 4WD track provides access into the DOC-Give site, although the experience within the DOC-Give area is not exceptional with numerous other opportunities to explore areas off track in a bush setting in the Hutt Valley and in the wider region. The site does not provide connectivity to other locations of interest and does not contain significant points of interest that would appeal beyond a niche audience.⁵⁷ While the 4WD track provides an alternative route for a short section of the Buchanan Road Tramping Track, Mr Harbrow considers its recreation value to be low.⁵⁸ Mr Harbrow noted the presence of informal trails into the DOC-Give site, including trails used for predator control lines, but recognised that these uses are inherently hard to quantify.
149. Recreation value of the DOC-Get land is confined to 33 m of a loop track on the Dry Creek site which is enabled by a public right of way. The Dry Creek entrance is used for access by walkers, mountain bikers, horse riders and campers, although no information is provided on the frequency of usage of the Dry Creek Loop Track. The Dry Creek entrance attracted 29,400 users in 2025 based on data sourced from Greater Wellington Regional Council. There will be no change in recreational values associated with Dry Creek.
150. The Firth Block, Southern Gully and Northern Gully sites currently have no public access due to their private ownership. The Applicant's assessment therefore describes their existing recreational values as nil. If the land exchange goes ahead, public access to these blocks will be enabled resulting in a future recreation value of Low. This rating is largely because no recreational development is proposed and the core value is ecological. The proposed right of way from Liverton Road for the Southern Gully provides only for conservation activities and maintenance by DOC. Public access to the Southern Gully would be through the Northern Gully which would in turn be connected to the Regional Park.
151. The assessment by Mr Harbrow noted that access to and within the DOC-Get sites would be poor as the land is fragmented, the blocks lack existing tracks and are steep and generally not well connected to conservation land within Belmont Regional Park. This contrasts with the relative ease of access to the DOC-Give land.⁵⁹
152. The Applicant amended its improvement package after receiving the draft exchange report to include public access from Liverton Road via the existing right-of-way through Southern Gully. This would create a new entry into the regional park, providing a direct connection into the DOC-Get land and linking through Northern Gully to the wider Belmont Regional Park track system.⁶⁰ The Applicant's assessment initially considered there to be no measurable gain or loss at the Regional Park scale,⁶¹ however this was revised to a gain with the addition of secured public access from Liverton Road and the creation of a unique ecological destination via the swamp mire restoration.⁶²
153. This differs from the assessment of Mr Harbrow who considers the current recreational value of the DOC-Get land to be Low⁶³ and the value of the DOC-Give land higher at Low-Medium. The land exchange would therefore reduce the recreation value of conservation land. Key factors in his assessment are:⁶⁴
- a. The ease of recreational access both to and within the DOC-Give land compared to the DOC-Get land.

⁵⁷ Recreation statement of advice, Mike Harbrow dated April 2026 at [26].

⁵⁸ Recreation Assessment, Rob Greenaway & Associates dated December 2025, page 4.

⁵⁹ Recreation statement of advice, Mike Harbrow dated April 2026 at [28].

⁶⁰ Memorandum from R. Greenaway dated 15 June 2026 at [23].

⁶¹ Recreation Assessment, Rob Greenaway & Associates, December 2025, page 13.

⁶² Memorandum from Rob Greenaway dated 15 June 2026 at [28].

⁶³ Recreation statement of advice, Mike Harbrow dated April 2026 at [35].

⁶⁴ Recreation statement of advice, Mike Harbrow dated April 2026 at [52].

- b. The extent to which the DOC-Get land has been subject to human modification compared to the DOC-Give land.
 - c. The contiguous nature of the DOC-Give land and length of experience that is possible within it, compared to the fragmented nature of the DOC-Get land and the smaller size of the individual blocks.
154. Mr Harbrow assessed the amalgamated values of the DOC-Get sites as Low.⁶⁵
155. Mr Harbrow assessed Conditions Package A proffered by the Applicant. He considered that allowing access to the DOC-Get land from Liverton Road for recreational users would improve the recreational value of the proposed exchange by offering legal and practical access into the Southern Gully, the proposed plantings of swamp maire and the Northern Gully. It is also possible that this access could improve linkages with other areas of Belmont Regional Park, but he notes that the terrain at the end of the Northern Gully is steep. Mr Harbrow considered that Conditions Package A would increase the “level of access” rating for the DOC-Get land from Low to Low-Medium. Due to constraints such as poor road access by Liverton Road and the limited experience offered it did not result in a change to the recreation values.

DOC's overall value ranking – Recreation		
		Assessment including the proffered improvements
DOC-Give site:	Low-Medium	N/A
DOC-Get sites:		
Northern Gully	Low	Low
Firth Block	Low	Low
Dry Creek	Low	Low
Southern Gully	Low	Low

Table 4: Conservation values for recreation

5.1.5 Heritage values

156. The Application is supported by the following assessments:
- a. Archaeological Assessment, Clough and Associates Ltd, November 2025
 - b. Cultural Values Assessment, Hikoikoi Management Limited, December 2025
 - c. Land Exchange Report, Wikairaa Consulting Limited, December 2025
157. Historic heritage has been reviewed by Mr Richard Nester and his advice provided to DOC ([Appendix 4F](#)).

Archaeology

158. The Applicant's archaeological assessment notes that there are no archaeological or historic heritage sites recorded within or in close proximity to any of the land exchange sites.⁶⁶ The DOC-Give site, Northern and Southern Gully sites have the potential to contain archaeological sites associated with early European settlement, and accordingly the heritage values are estimated as being low to moderate.⁶⁷ The Firth Block is unlikely to have any

⁶⁵ Recreation statement of advice, Mike Harbrow dated April 2026 at [56].

⁶⁶ Archaeological Assessment, Clough and Associates Ltd dated November 2025 at [26].

⁶⁷ Archaeological Assessment, Clough and Associates Ltd dated November 2025 at [62-63].

archaeological sites due to the steep and hilly nature, and no evidence of an historical access track. Similarly, the Dry Creek site is unlikely to have any archaeological sites due to its topography and past usage for quarrying. Consequently the assessment considers that there will be no known effects on archaeological or historic values.⁶⁸ The assessment considers that the loss of the DOC-Give site will be compensated by the addition of the Northern and Southern Gully sites, both of which have some potential for containing archaeological sites of similar values.⁶⁹ The assessment concludes that the benefits of the land exchange are neutral.⁷⁰

159. The presence of archaeological sites associated with Māori occupation and settlement are considered to be very low.⁷¹
160. Mr Nester undertook a review of the archaeological report and records of meetings between the Applicant and Heritage New Zealand Pouhere Taonga. He noted that the DOC-Give site has one recorded cultural heritage site. It is recorded by the New Zealand Archaeological site recording scheme as R27/910 and is described as the remains of 'Farm Building' and historic artefacts. The site includes a collapsed roof and associated building framing, roofing iron, concrete footings, fences and some artefacts (glass bottles). Although this indicates a previous land use, he considered that the significance of it is low.⁷² He considered there is potential for partial remnant of a pre-1900 tramway used for timber extraction to be present in the Northern Gully and the Southern Gully although no tramway has yet been discovered.
161. Ms Cameron responded to the Draft Land exchange Report and agreed with parts of Mr Nester's assessment. In terms of the archaeological significance or value of Site R27/910 she considered that while the significance is currently low the ranking of medium could be applied in future if based on the nature of any subsurface remains, and their condition and extent. She considered there is potential for archaeological remains of the tramway identified on an historical plan to also be present in both the Northern and Southern Gully sites. This would result in a low-medium ranking for archaeological value for Southern Gully. She noted that Mr Nester stated that broader cultural values identified and associated with mana whenua are not addressed in his report, yet Table 2 contains a "Cultural Value" with low value assigned for all of the land exchange sites. She recommends that the cultural values column is removed completely from the table or that the low value is removed and replaced with a value to be determined by mana whenua.

Overall

162. Mr Nester considered that the rating of the heritage values of both the DOC-Give site and the DOC-Get sites is Low. He assessed the amalgamated values of the DOC-Get sites as Low.⁷³
163. Mr Nester assessed the improvements proffered by the Applicant, but it did not change the heritage values.

DOC's overall value ranking – Heritage		
		Assessment including the proffered improvements
DOC-Give site:	Low	N/A

⁶⁸ Archaeological Assessment, Clough and Associates Ltd dated November 2025 at [66].

⁶⁹ Archaeological Assessment, Clough and Associates Ltd dated November 2025 at [68].

⁷⁰ Archaeological Assessment, Clough and Associates Ltd dated November 2025 at [74].

⁷¹ Archaeological Assessment, Clough and Associates Ltd dated November 2025 at [42].

⁷² Cultural heritage statement of advice, Richard Nester dated 22 April 2026 at [11 and 12].

⁷³ Cultural heritage statement of advice, Richard Nester dated 22 April 2026 at [19].

DOC-Get sites:		
Northern Gully	Low	Low
Firth Block	Low	Low
Dry Creek	Low	Low
Southern Gully	Low	Low

Table 5: Conservation values for heritage

5.1.6 Landscape and natural character values

164. Mr Rhys Girvan from Boffa Miskell undertook a landscape assessment of the DOC-Get and DOC-Give land on behalf of Winstone Aggregates. The landscape assessment followed Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines. The parcels were assessed in terms of the following attributes:

- a. Physical - being the tangible elements of the landscape;
- b. Perceptual – which is how people experience and interpret the landscape; and
- c. Associative – which captures the cultural, historical and spiritual connections that people and communities have with a place.

165. This assessment has been reviewed by Mr Jeremy Head in his advice to DOC ([Appendix 4C](#)).

166. The Applicant's landscape assessment and review of each parcel is summarised below, along with Mr Head's assessment.

DOC-Give

167. The perceptual attributes are of this parcel being part of the broader rolling vegetated landscape of the Belmont Regional Park. The elevated parts of this parcel contribute to the green backdrop that frames the upper slopes of the western Hutt hills. It transitions between the pastoral grasses and the regenerating native vegetation. The nearest properties are rural residential and are located approximately 750 m away, with residential suburbs of Taitā and Pomare being the closest urban development. Most of these properties are described as having no view of the DOC-Give parcel beyond the vegetated slopes of the western escarpment, such as the residential development located on the eastern Hutt hills which has views of the DOC-Give parcel above the western escarpment.

168. Given its proximity to the Belmont Regional Park, Mr Girvan described the associative attributes as conservation, recreation and transitioning farming activity.

169. This area is assessed by the Applicant as having moderate landscape value and low-moderate visibility. Its proximity beside the established quarry reflects a relatively contained aspect of the broader Belmont Hills with capacity to absorb progressive quarry development. There are no significant cultural or historical associations in the context of former and existing quarrying activity.

170. All three attributes for the DOC-Give parcel are classed by the Applicant as having a Moderate value, giving an overall landscape value of Moderate. Mr Head agrees with this assessment.

171. Given the limited visibility of the block due to vegetation, intervening landforms and distance, the Applicant classified visibility as Low-Moderate. Mr Head agrees.

172. Mr Head noted that the DOC-Give site could reach a Moderate 'plus' value if there is no land swap and the block keeps getting managed as it is now through animal and weed pest control. He considers that there should be some level of improvement (above the 'Moderate' status quo) condition of the block over time.

Northern Gully

173. The Applicant described the perceptual attributes as being connected to the pattern of incised gullies that contrast with the more prominent spur of the Wellington Fault. The proximity to the Extraction Zone means this block is not memorable or visible. It is part of the broader elevated green backdrop above the western escarpment. The microclimates in this block add ecological and visual richness.
174. The presence of the QEII covenant supports ongoing conservation and ecological value, however no significant cultural or historical associations have been identified. The QEII covenanted area is not accessible by the public.
175. The Applicant considers the block has Moderate-High physical values, Moderate perceptual values and Moderate-High associative values. Mr Head elevates the associative values as Moderate-High to High for the QEII covenanted area and Moderate-High outside the QEII covenanted area. Mr Head considers that overall the site has Moderate-High landscape value with low visual sensitivity given it is visible from the quarry with only limited glimpses from the rural residential properties to the north of Kelson.

Southern Gully

176. The Applicant described the perceptual attributes as being derived from its location on the edge of the working quarry and the rural lifestyle development along Liverton Road. It is described as not being particularly memorable and is generally not visible above the more prominent western escarpment.
177. There are little associative values, and it is a localised area of regenerating vegetation with a wetland that contributes to the wider landscape.
178. The Applicant assessed the physical and perceptual values as being Moderate, with Low-Moderate associative values. This gives an overall Moderate landscape value and Low to Low-Moderate visual sensitivity. There is the potential for ongoing rehabilitation restoring natural character along existing streams and wetlands and expanding area of regenerating native vegetation. Mr Head agrees.

Dry Creek Quarry

179. The Applicant described the perceptual attributes as reflecting the former use as a quarry and cleanfill, however the original gully structure is still present. It is a missing piece of the wider escarpment system. When viewed closely, the benching does not have a high degree of naturalness however from a distance or in the context of the adjoining vegetated hills the sight aligns visually with the surrounding landscape.
180. The Applicant considered that the block has limited associative values reflecting its industrial history. Filming occurred at this site for Helm's Deep and Minas Tirith in the Lord of the Rings trilogy providing some more recent associative values.
181. The Applicant assessed Dry Creek as having Moderate physical and perceptual values, and Low-Moderate associative values, with an overall landscape value of Moderate and Low to Low-Moderate visual sensitivity. The visual sensitivity rating is due to its enclosed contained landform. There is the potential for ongoing rehabilitation restoring natural character along

existing streams and wetlands and expanding area of regenerating native vegetation. Mr Head disagrees and classifies all landscape values for the Dry Creek site as being Low-Moderate.

Firth Block

182. The associative values are assessed by the Applicant as Moderate-High due to the presence of the QEII conservation covenant and its contribution to the broader vegetated western escarpment. Mr Head considered the associative values are Moderate-High to High. The Applicant assessed the physical values as Moderate-High, and perceptual values as High given its visual prominence.
183. The Applicant considered the overall landscape values to be Moderate-High, with High visibility. Mr Head assesses the Firth Block as having a slightly higher overall landscape value than that of the Applicant, with a Moderate-High to High value.

General comments

184. The capacity of the landscape was also assessed by Mr Girvan, with Belmont Hills having a moderate landscape capacity within the undulating round ridgetop which is stepped back from the western escarpment. The western escarpment by comparison has more limited capacity for change as it is more visible, with prominent revegetated spurs, enclosed wetlands and gullies. Mr Head agrees with the assessment and notes that capacity will be a relevant matter only when the substantive application is being assessed.
185. Mr Head agrees that the DOC-Get areas will not visually change much (if at all) when viewed from afar – especially to the lay person. He considered that the Firth Block and Dry Creek land parcels would consolidate the broader vegetated setting.
186. The Applicant's landscape assessment considers there would be a net gain in landscape values by:
- a. Increasing the extent of high-value vegetated land with higher naturalness and intactness than the land removed.
 - b. Maintaining the scenic backdrop role in the Hutt Valley, consistent with its recognition in the Greater Wellington Regional Council Parks Network Plan;
 - c. Strengthening the contribution of landscape values to the conservation estate including connectivity and legibility along the western escarpment and the ongoing rehabilitation of Dry Creek.
187. Mr Head notes some omissions in Mr Girvan's assessment, such as the absence of any discussion of edge effects. The significance of edges is that they are particularly sensitive to weed and pest invasion. Mr Girvan responded to these concerns. Although they did not change Mr Girvan's overall landscape conclusion, he considered it is a matter that should be addressed through robust and measurable conditions.⁷⁴ Mr Head agrees with Mr Girvan's recommendation but considers that edge effects will prevail to a degree. The measures do not promise to eliminate edge effects.
188. In addition, Mr Head considers that ecological values / levels of biodiversity should form a more transparent contribution towards a description of the various land parcels' levels of natural landscape character.

⁷⁴ DOC peer review memorandum – landscape, R. Girvan dated 10 June 2026, page 9

189. Mr Head considered the amalgamated landscape value for the DOC-Get sites as Moderate to Moderate-High.⁷⁵
190. Mr Head considered the effect on landscape values if the Conditions Package A is successfully implemented. He concluded that the landscape values would be increased in the Northern Gully and Dry Creek. For Northern Gully, the increase is based on the combination of animal pest control and weed eradication enabling improvements to the forest understorey and the substantial removal of exotic canopy species which would otherwise continue to self-seed.⁷⁶ The increase in landscape value for Dry Creek is based on 90% weed eradication, canopy closure, natural regeneration and the beginning of natural ecological processes over the entire land parcel. The supplementary planting proposed also would enhance the landscape values. Including the improvements offered by the Applicant gives an overall landscape value for the DOC-Get sites as Moderate-High.⁷⁷

DOC's overall value ranking – Landscape and natural character		
		Assessment including the proffered improvements
DOC-Give site:	Moderate	N/A
DOC-Get sites:		
Northern Gully	Moderate-High	Moderate-High to High
Firth Block	Moderate-High to High	Moderate-High to High
Dry Creek	Low-Moderate	Moderate
Southern Gully	Moderate	Moderate

Table 6: Conservation values for landscape and natural character

5.1.7 Cultural values

191. DOC did not commission an expert to undertake an assessment of the cultural conservation values as this was appropriately provided by mana whenua. The cultural values for the exchange parcels and opportunities for enhancement as expressed in the Cultural Values Assessment prepared by Hikoikoi Management Limited are summarised here. The consideration of the DOC-Give and DOC-Get sites are in the context of a broader association with the Belmont landscape, with known features such as Pōkaimangumangu, Speedy's Stream and the Puke Ariki Traverse alongside the physical features of Belmont.
192. The principles used for assessing cultural values in the Cultural Values Assessment are:
- Enduring association;
 - Treaty settlement context;
 - Kaitiakitanga;
 - Ki Uta, Ki Tai;
 - Cultural integrity;
 - Access and integrity;
 - Cultural indicators; and
 - Customary practice.

⁷⁵ Landscape statement of advice, Jeremy Head, May 2026 at [46]

⁷⁶ Landscape statement of advice, Jeremy Head, May 2026, page 12

⁷⁷ Landscape statement of advice, Jeremy Head, May 2026 at [46]

DOC-Give

193. This site is part of the Belmont landscape with enduring cultural association through whakapapa, identity, and kaitiakitanga responsibilities. The site is connected to a much wider catchment reflecting Ki Uta Ki Tai. The cultural values are expected to remain consistent given that there will be no opportunities for increased access, interpretation or visible mana whenua presence.⁷⁸

DOC-Get

194. The Cultural Values Assessment considers that from a cultural perspective all of the DOC-Get parcels hold comparable value due to limited access and cultural visibility.⁷⁹

Northern Gully

195. The Cultural Values Assessment highlights the significance of the forested gullies and regenerating vegetation which reflects the principles of enduring association and kaitiakitanga. The continuous vegetation cover connects land, water and people through whakapapa and carries mouri.

Southern Gully

196. Of note, the stream within the Southern Gully flows into Te Awa Kairanga which is a statutory area in Schedule 1 of the Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009. The block therefore strengthens the hydrological and spiritual connection to Te Awa Kairangi.

Dry Creek

197. The regenerative native cover provides a connection with the surrounding Belmont Park and reflects the principals of whakapapa and Ki Uta Ki Tai. Its cultural connection lies in the connections of land and water and the responsibilities of kaitiakitanga that apply across the catchment.

Firth Block

198. The ridgelines, regenerating vegetation and wetland features demonstrate the principles of Ki Uta Ki Tai and cultural integrity, and support the continuity of the Belmont landscape. Cultural values are expected to remain consistent although mana whenua may wish to influence how the mouri of water and vegetation health is understood and managed in the future.

Enhancements

199. The Cultural Values Assessment considers that the land exchange creates opportunities to strengthen cultural values where mana whenua involvement is embedded in access, restoration and interpretation.⁸⁰ The key opportunities include:
- a. Pest management – opportunities to shape the targeted pest management programme and provide delivery and monitoring where appropriate (Northern Gully, Southern Gully, Firth Block).
 - b. Weed management – opportunity for mana whenua in developing and implementing (Northern Gully, Southern Gully, Dry Creek).
 - c. Cultural harvesting of fallen swamp maire materials from Southern Gully

⁷⁸ Cultural Values Assessment, Hikoikoi Management Limited dated December 2025 at [30]

⁷⁹ Cultural Values Assessment, Hikoikoi Management Limited dated December 2025 at [31]

⁸⁰ Cultural Values Assessment, Hikoikoi Management Limited dated December 2025 at [45]

- d. Active indigenous revegetation – providing cultural oversight on how the revegetation area is implemented and monitoring. Identification of taonga species (Firth Block and Dry Creek).
200. Enhancement such as weed management and restoration planting provide opportunities to restore mauri and enable kaitiakitanga. It enables greater visibility of cultural values. The Cultural Values Assessment considers that any action that uplifts the land contributes to mana whenua responsibilities and gives effect to kaitiakitanga.⁸¹

5.1.8 Overall comparative assessment of conservation values

201. The collation of the conservation values derived from the technical assessments undertaken for DOC are summarised in the following table (Table 8). The table also includes a “composite ranking” of all the conservation values of the DOC-Get sites, noting that these values assume an equal weighting of the conservation values, and the same for the DOC-Give sites. The assessment of cultural values was derived from the Cultural Values Assessment Report. These values were not able to be accounted for in the composite ranking because of the different way they had been described.
202. The assessments undertaken by DOC include the improvements offered by the Applicant. During the process of preparing the land exchange report, the improvements and conditions have evolved – firstly the improvements offered as part of the initial application and secondly in response to the draft Land Exchange Report where the Applicant proposed Conditions Package A. For the avoidance of doubt, the conservation values in Table 7 are in response to Conditions Package A as the experts considered whether Conditions Package A caused them to change their values. Table 7 identifies the sites and assessments that experience an increase in values arising from the proposed improvements as assessed by the experts advising DOC.

⁸¹ Cultural Values Assessment, Hikoikoi Management Limited dated December 2025 at [32]

	DOC-Give	Northern Gully	Firth Block	Dry Creek	Southern Gully	Composite ranking for DOC-Get	Net gain?
Flora	Moderate-High	Moderate	Moderate	Low-Moderate	Moderate	Moderate	No (Loss)
Terrestrial fauna	Moderate	Moderate	Moderate	Low	Low -Moderate-Low	Moderate-High	Yes
Landscape and natural character	Moderate	Moderate-High to High	Moderate-High to High	Moderate	Moderate	Moderate-High	Yes
Recreation	Low-Medium	Low	Low	Low	Low	Low	No (Loss)
Heritage	Low	Low	Low	Low	Low	Low	No (No change)
Freshwater Ecology	Medium-High	Medium	Medium-High	Low	Medium-High	Medium-High	No (No change)
COMPOSITE OF ALL VALUES EXCLUDING CULTURAL	MODERATE-LOW - MODERATE	MODERATE-LOW - MODERATE	MODERATE-LOW - MODERATE	LOW - MODERATE-LOW	MODERATE-LOW - MODERATE	MODERATE-LOW - MODERATE	NO (NO CHANGE)
Cultural	Expected to remain consistent					Strengthened providing an overall uplift in conservation outcomes	Yes – based on Cultural Values Assessment Report

Table 7: Assessment of conservation values with Conditions Package A as assessed by the experts advising DOC and the Cultural Values Assessment Report. The green shading indicates those values that increase as a result of the improvements offered by the Applicant.

203. Table 7 demonstrates that based on the conservation values of the sites (taking into account proposed improvements through conditions), there would be:
- a net benefit for landscape and natural character, cultural and terrestrial fauna values;
 - no difference (and therefore no net gain) for heritage and freshwater ecology values; and
 - a loss (and therefore no net gain) for flora and recreation values.
204. Table 8 reflects the updated expert assessments of the Applicant in response to the matters raised in the Draft Land Exchange Report and implementation of Conditions Package A. The Applicant considers those changes strengthen the comparative assessment and confirm that the proposed exchange delivers an overall net conservation gain.⁸² The Applicant's assessment of the conservation values of the sites (taking into account the proposed improvements of Conditions Package A), and whether there would be "net gain" to conservation values, is as follows:⁸³

	DOC-Give	DOC-Get	Net gain?
Ecology (habitat)	Moderate	Moderate - Very High	Yes
Ecology (birds)	Moderate	High	Yes
Ecology (bats)	Nil	Nil	No (No change)
Ecology (lizards)	18.83 ha of habitat	33.19 ha of habitat	Yes
Ecology (freshwater)	Low	Medium - High	Yes
Hydrology	1,855 m of stream length	3,029 m of stream length	Yes
Landscape	Moderate	Moderate - High	Yes
Recreation	Low	Low - Medium	Yes
Archaeology	Very Low	Very low	No (No change)
Cultural	Expected to remain consistent	Strengthened providing an overall uplift in conservation outcomes	Yes - based on Cultural Values Assessment

Table 8: The Applicant's assessment of conservation values based on Conditions Package A

⁸² Response to the draft DOC report, J Wikaira, dated 15 June 2026 at [132]

⁸³ Response to draft DOC Report memorandum, J. Wikaira dated 15 June 2026, Table 28

205. The Applicant considers that the effect of the land exchange including the improvements offered through Conditions Package A is that there would be a net gain in the following areas:
- a. ecology (habitat, birds, and lizards and freshwater);
 - b. landscape;
 - c. hydrology;
 - d. recreation; and
 - e. cultural values.
206. There would be no change in conservation values for ecology (bats) and archaeology.
207. The following table brings the previous two tables together and compares the different values between the Applicant's and DOC's assessment. This table reflects the assessment of conservation values taking into account Conditions Package A. DOC's expert advisers' assessments are shown in green font, Winstone's assessments in black font.

	DOC-Give	Northern Gully	Firth Block	Dry Creek	Southern Gully	Composite ranking for DOC-Get	Net gain
Ecology (habitat)	Moderate	Very High	Moderate	Moderate	Very High	Moderate – Very High	Yes
Flora	Moderate-High	Moderate	Moderate	Low-Moderate	Moderate	Moderate	No (Loss)
Ecology (birds)	Moderate					High	Yes
Ecology (bats)	Nil					Nil	No (No change)
Ecology (lizards) ⁸⁴	18.83 ha of habitat					33.19 ha of habitat	Yes
Terrestrial fauna	Moderate	Moderate	Moderate	Low	Low to Moderate-Low	Moderate-High	Yes
Ecology (freshwater)	Low	Medium	Medium	Medium	High	Medium-High	Yes
Freshwater	Medium-High	Medium	Medium-High	Low	Medium-High	Medium-High	No (No change)
Hydrology	450 m	620 m	110 m	127 m	170 m		
Landscape	Moderate	Moderate-High	Moderate-High	Moderate	Moderate	Moderate – High	Yes
Landscape and natural character	Moderate	Moderate-High to High	Moderate-High to High	Moderate	Moderate	Moderate-High	Yes
Recreation	Low	Nil	Nil	Low	Low-Medium	Low-Medium	Yes
	Low-Medium	Low	Low	Low	Low	Low	No (Loss)
Archaeology	Very Low	Very Low	Negligible	Negligible	Very low	Very Low	No (No change)
Heritage	Low	Low	Low	Low	Low	Low	No (No change)

⁸⁴ Note corrected area of lizard habitat which was transposed in the Land Exchange Report

Cultural	Expected to remain consistent	Strengthened providing an overall uplift in conservation outcomes	Yes - based on Cultural Values Assessment Report
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Table 9: Comparison of the Applicant's assessment of values (black) against that undertaken on behalf of DOC (green)

This assessment takes into consideration Conditions Package A.

5.1.5.1 Conclusion on comparative assessment of values that relate to each area of land concerned

208. This section draws together the above discussion and provides an overall assessment of whether there is a gain/benefit in conservation values through the exchange.
209. While three of the DOC assessments indicate a net gain, all but two of the assessments undertaken by the Applicant indicate a net gain. The DOC assessments indicate two areas where there would be a net loss (flora and recreation) but none of the Applicant's assessments result in a net loss.
210. The subject areas where the values are aligned between the Applicant and DOC are in terrestrial fauna, landscape and archaeology / heritage.
211. The land area proposed to be exchanged is larger for the combined DOC-Get, with 23.86 ha for the DOC-Give and 34.1 ha for the DOC-Get. The gain for terrestrial fauna is that DOC gets an increased land area and some of it is of relatively high value, and better habitat for birds and lizards. That is countered by some land being of low value and requiring significant resources to maintain in good condition.
212. Other benefits include:
- a. An additional access point into the Regional Park from Liverton Road for conservation purposes and public access.
 - b. A gain in stream length and watercourses (ephemeral/intermittent/perennial) in the order of 2,408m compared to 1,855m.
 - c. A gain in habitat associated with the increased length of stream.
 - d. Comprehensive and effective pest and weed management.
 - e. Restoration opportunities (noting the concern outlined below about monoculture). An increase in eco-sourced indigenous vegetation will be a benefit.
 - f. Potential catalyst for research into swamp maire, including propagating
 - g. Increase in the number of swamp maire, a benefit to a Threatened - Nationally Vulnerable species.
 - h. Animal pest control measures that would be expected to increase breeding success of indigenous species. This could result in higher density of birds and lizards (if effective over a long time period: birds – about five consecutive years; lizards – approximately 20 consecutive years)
 - i. Better quality habitat arising from restoration planting and weed management.
 - j. Improvements to the landscape values of the Northern Gully arising from the combination of animal pest control and weed eradication enabling improvements to the forest understorey and the substantial removal of exotic canopy species which would otherwise continue to self-seed into the native forest cover.⁸⁵
 - k. Improvements to the landscape values of Dry Creek. The increase is based on 90% weed eradication, canopy closure, natural regeneration and the beginnings of natural ecological processes over the entire land parcel and 90% plant establishment within the 'supplementary planting area' shown on the Boffa Miskell Landscape Appendix B6a.⁸⁶
 - l. Removal of rubbish and remediation of contamination.
 - m. Opportunities for kaitiakitanga, and for mana whenua to partner in the restoration efforts

⁸⁵ Landscape statement of advice, Jeremy Head, April 2026, page 12

⁸⁶ Landscape statement of advice, Jeremy Head, April 2026, page 13

5.2 Financial implications for the Crown (cl 26(1)(b))

213. When considering a land exchange, the Panel must take into account the financial implications for the Crown of the land exchange.

Land value

214. The DOC-Give site has a book value of approximately \$6,590.68 per hectare.
215. The August 2025 valuation undertaken by Colliers⁸⁷ values the DOC-Get sites at \$539,000 and the DOC-Give site at \$428,000.
216. Given the difference in values, clause 31(2) of the Schedule 6 is relevant to this application. It requires:
- No condition may be imposed in accordance with subclause (1) requiring the payment of money by the Crown to offset any inequality between the market value of the land to be acquired by the Crown and the land to be given by way of exchange by the Crown, and nothing in this Act otherwise requires such a payment.*
217. In terms of the land valuation, there are no financial implications of the land exchange for DOC.

Operational costs

218. There are two works programmes that are involved in the proposed land exchange area, being:
- a. Parks operations (ranger services and asset maintenance work).
 - b. Biodiversity, Key Native Ecosystem operations.
219. As these works programmes are applied to the whole of the Belmont Regional Park, Greater Wellington Regional Council has advised that the total operational expenditure for the DOC-Give land is in the vicinity of \$5,000 per annum.
220. Other operations relevant to the DOC-Give site includes pest and weed control which amounts to \$4,500 per annum ongoing pest animal control (ungulates, possums and mustelids). Greater Wellington Regional Council noted that the land that is proposed for DOC-Get has a much higher weed burden than the DOC-Give land. Managing weeds will likely require a greater investment than the current \$4,500.
221. The maintenance costs for the blocks are a liability for DOC as there is no operational expenditure or human resource capacity to manage the land, it is not a property that is an Outcome Plan site, has no ranking, and therefore additional time and money is not justified for biodiversity or public access reasons.
222. The conditions proposed by the Applicant (Conditions Package A) include five years of weed management and ten years of animal pest control, but following that the Applicant's responsibilities will end and the cost of ongoing maintenance will become an expense to DOC.

5.3 Consequences of the land exchange (cl 26(1)(c))

223. When considering a land exchange, the Panel must take into account whether the consequences of the land exchange would be practical to manage on an ongoing basis,

⁸⁷ Valuation Report, Colliers dated August 2025, page 54

including consideration of whether the land exchange would result in an enclave of private land within a conservation area or a Crown-owned reserve.

224. DOC confirmed during consultation that the DOC-Get areas will be subject to the same management regime as other Crown-managed reserves in the Wellington region.
225. The most challenging characteristics of the DOC-Get sites are:
- a. The terrain and topography;
 - b. Increased perimeter and therefore a greater risk of incursion by weeds and pests;
 - c. Low level of regeneration in places; and
 - d. Level of weeds already present.
226. The exchange will not create an enclave of private land. With the exception of the Southern Gully (which is connected by way of the Northern Gully), all the DOC-Get sites are contiguous with the Belmont Regional Park.
227. The Applicant considers that the ongoing management and maintenance burden on the Crown is anticipated to be low,⁸⁸ however given the level of weeds in some parts of the DOC-Get sites more intensive management will be required. If the land exchange is approved, the details and implementation of the improvement package (including significant weed and pest control and planting) will be critical to minimising the actions required by the Crown to manage the land.

5.4 Legal and financial liabilities and risks (cl 26(1)(d))

228. When considering a land exchange, the Panel must take into account the legal and financial liabilities and health and safety risks for the Crown associated with the land exchange. The Land Exchange Application states (12.0 onwards) that there are limited legal and financial liabilities associated with the land parcels as part of the exchange.

Northern Gully

229. First, there is the QEII covenant over the Firth Block and the Northern Block. The covenant is an Open Space Covenant (10476608.1) pursuant to s 22 of the Queen Elizabeth the Second National Trust Act 1977. The instrument is the same for both and prevents the following activities (in summary):⁸⁹
- a. The removal of native vegetation or planting of any non-native vegetation.
 - b. Construction / erection of buildings or signs.
 - c. Mining or quarrying.
 - d. Depositing rubbish.
 - e. Allowing livestock into the covenanted areas.
 - f. Altering or disturbing water courses.
 - g. Disturbing ground.
230. The only aspect of the Covenant that would seem a potential liability for the Department is the restriction on stock usage in the covenant. That might result in the Department having to take steps to fence the area to keep stock out, particularly if the current fencing is not adequate. The Covenant itself has requirements on fencing, which is to be discussed with the National Trust noting also the Fencing Act 1978 applies to the boundaries.

⁸⁸ Land Exchange Report, Wikaira Consulting dated December 2025 at [12.36]

⁸⁹ Valuation Report, Colliers dated August 2025, page 16

231. The Northern Gully has potentially been subject to over burden on the site (particularly on Lot 5). Part of Lot 1 is also subject to an open space covenant (Covenant 10476608.1) (addressed above).
232. The Preliminary Site Investigation sets out the various approvals acquired for this purpose in the vicinity of the Northern Gully area.⁹⁰ This is noted as being unlikely to have involved hazardous material⁹¹, however, this is not known for certain. In addition to overburden the wider property is listed on Greater Wellington Regional Council's Selected Land Use Register (SLUR) for mining extraction (quarrying activities) and the bulk storage of drums for fuel, chemicals or liquid waste.⁹²The significance of this classification is discussed below.
233. A memorandum by Pattle Delamore Partners Limited⁹³ addressed an isolated pocket of dumped waste material (including drums, metal, and other debris) that is present in the stream as well as an area approximately 25m by 20m on the adjacent stream embankment extending to the stream. The material on the streambank comprises a heterogeneous mixture of materials, including concrete, corrugated iron, scrap metal, rusted empty drums, a collapsed shed, and an old refrigerator. The deposited material extends to the edge of the stream. Pattle Delamore Partners Limited considers that potential localised contamination may be present within and hydraulically downgradient of the area of dumped material; however, its presence can only be confirmed through targeted site investigation. Pattle Delamore Partners Limited recommends a targeted investigation of this discrete area to confirm the presence or absence of contamination in the soil underlying and the surrounding material. The results of this investigation will also inform the nature and extent of any contamination identified and the use of the site in supporting the development of appropriate remedial options, if required.
234. Part of the Northern Gully is a designed landform accommodating overburden. It is understood this has been designed to achieve acceptable levels of static and seismic stability (Damage Control Limit State) with calculated displacements in the Maximum Considered Earthquake of less than 170 mm.⁹⁴ Consequently the Applicant's report concludes there is limited slope instability hazards and negligible risk to persons and to conservation values.
235. Finally, there are overhead electricity transmission lines in the Northern Gully owned and operated by Transpower New Zealand Limited (**Transpower**) (which extend into the Belmont Regional Park). These lines will mean that there are some restrictions under the lines on the types of activities that can occur on the site, and the potential for future work to ensure adequate clearance between the top of the vegetation and the lines in accordance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001). Comments from Transpower on the draft Land Exchange Report states that it has no concerns with the proposed land swap. Transpower confirms that, based on the information supplied, National Grid assets and operations are not adversely impacted by the proposed land exchange. The comments observe that the Electricity Act grants Transpower the right to access tower structures situated on the land proposed for exchange. Transpower's statutory access rights under the Electricity Act 1992 are not altered by the change in land ownership / management and no additional easements or rights-of-way are required.

⁹⁰ Preliminary site investigation – Northern Gully, Southern Gully and Firth block, PDP, dated 5 December 2025, pages 7-8

⁹¹ Preliminary site investigation – Northern Gully, Southern Gully and Firth block, PDP, dated 5 December 2025, page 10

⁹² Preliminary site investigation – Northern Gully, Southern Gully and Firth block, PDP, dated 5 December 2025, page 12

⁹³ Draft DOC report response, Pattle Delamore Partners Limited dated 15 June 2026, page 2-3

⁹⁴ Geotechnical Appraisal Report, Baseline Geotechnical Limited, dated December 2025, page 18

Southern Gully

236. The Southern Gully is subject to a proposed right of way access via Liverton Road. While the Colliers Report notes that this is proposed to be limited to maintenance purposes only,⁹⁵ this has been revised in the Applicant's response to the draft Land Exchange Report to provide public access.⁹⁶ Given that the intention is for this to provide public access, there will be costs associated with maintenance as well as potential impacts on the conservation values of the block.
237. The Southern Gully has also been subject to overburden disposal, but again it is noted by the Applicant that this is unlikely to be hazardous.⁹⁷ Given that it is likely to be natural in-situ material, comprising topsoil and weathered rock the placed overburden is not expected to represent a source of soil contamination within either gully.⁹⁸ Without further onsite studies it is not possible to confirm if that is the case.

Firth Block

238. The Firth Block is subject to the QEII covenant (addressed above).
239. There are records of potential land contamination.⁹⁹ The north-western portion of the Firth Block falls within the SLUR delineation for the overall property.
240. As noted in the geotechnical report, there is an area of instability between the Firth Block and the quarry pit wall.¹⁰⁰ The instability extends through the upper two batters, with debris spilling onto the benches below. The geotechnical assessment considered that a 6 m zone measured from the crest of the slope back into the Firth Block presents a higher risk of instability. The report recommends excluding people from accessing this area through fencing positioned a minimum of 6 m from the crest of the quarry batters.

Dry Creek

241. The Dry Creek block has records of fill in the northern corner. It is not clear to what extent there has been past quarrying and whether impacted by that or associated use that might have contaminated the land being obtained. There is also a right of way road in the southern corner of the block.
242. The Application notes that there is the possibility for contamination on the site and that, in the future event of public tracks being constructed, steps would be needed to ensure this was safe for the public in future.¹⁰¹ Overall the Applicant advises that contamination risk is identified as being low. Evidence provided and obtained by Pattle Delamore Partners during the preliminary and detailed site investigation indicates the site has been subject to consented clean filling (cleanfill material was restricted to clay, soil, rock, asphalt, brick or concrete (including reinforcing steel)). Therefore, the scope of soil investigation undertaken at Dry Creek by Pattle Delamore Partners was limited as potential for contamination that could impact the site, future site users and wider environment was considered unlikely (or low). Shallow soil investigations were undertaken (to approximately 0.3 m depth) to assess the potential exposure risks to site users (e.g. DOC workers) who may be undertaking planting. Pattle Delamore Partners considered that based on the results of the testing there are no contaminants identified that would present a risk to staff/personal involved in the planting or

⁹⁵ Valuation Report, Colliers dated August 2025, page 17

⁹⁶ Response to the DOC Draft Report memorandum, R. Greenaway dated 15 June 2026 at [23]

⁹⁷ Preliminary site investigation – Northern Gully, Southern Gully and Firth block, PDP, dated 5 December 2025, page 10

⁹⁸ Draft DOC report response, Pattle Delamore Partners Limited dated 15 June 2026, page 3

⁹⁹ Preliminary site investigation – Northern Gully, Southern Gully and Firth block, PDP, dated 5 December 2025, page 12

¹⁰⁰ Geotechnical Appraisal Report, Baseline Geotechnical Limited, dated December 2025, page 14

¹⁰¹ Preliminary and Detailed Site Investigation – Dry Creek, PDP, dated 5 December 2025.

soil disturbance.¹⁰² The memorandum acknowledges that it is possible that with any historic filling activity there may have been placement of 'non-complying' fill materials but Pattle Delamore Partners considers there is no information to suggest that this had occurred, including no visual evidence during the shallow site test pit investigation.¹⁰³

243. The geotechnical report notes that localised small-scale instability may still be possible in cut batters above the former quarry access road, but that scale of instability will present little risk to persons and negligible risk to conservation values.¹⁰⁴

Summary of key risks from land proposed to be obtained from exchange

244. The preliminary site investigation undertaken by Pattle Delamore Partners Limited incorporated a review of current and historical information for each site and concluded that the bulk storage of drums for fuel, chemicals, or liquid waste occurred in discrete, centralised areas within Belmont Quarry, located toward the centre of the property and outside the site boundary of Northern Gully, Southern Gully and Firth land that is subject to the exchange. No evidence of bulk storage of drums for fuel, chemicals, or liquid waste was identified within the site boundaries (Northern Gully, Southern Gully and Firth Block). As such, Pattle Delamore Partners Limited consider additional investigation is not warranted in relation to this potential contaminant source.¹⁰⁵
245. Aside from the QEII covenant, the most significant risk is the remediation of any contamination caused by the dumped material in the waterway of the Northern Gully. Depending on what forms of contamination / fill is present, there is a risk that DOC will have a legal liability to clean some of the material if it becomes a hazard to the public. This is also a potential health and safety hazard for anyone using the areas.

DOC-Give site

246. The main legal risk to note is there is a paper road in the northern corner that belongs to the Hutt City Council. The applicant has indicated that the paper road (and it is assumed the land beneath it), will not be included in the exchange. It will be necessary to consider what is going to occur to this as part of the exchange, although Winstone indicates that it will pursue the road stopping and acquiring of this land at a later date from Hutt City Council in the event that the approvals are granted.
247. In addition, there is going to be a need for adequate public awareness of the new boundaries of the Regional Park.

Financial liabilities

248. Weed and pest control will financially be a liability that falls on DOC to maintain the DOC-Give sites as discussed in section 5.2.

5.5 Statements of general policy (cl 26(1)(e))

249. When considering a land exchange, the Panel must take into account statements of general policy under section 17B or 17C of the Conservation Act 1987.
250. The following documents are relevant.

¹⁰² Draft DOC report response, Pattle Delamore Partners Limited dated 15 June 2026, page 4

¹⁰³ Draft DOC report response, Pattle Delamore Partners Limited dated 15 June 2026, page 4

¹⁰⁴ Geotechnical Appraisal Report, Baseline Geotechnical Limited, dated December 2025, page 9

¹⁰⁵ Preliminary site investigation – Northern Gully, Southern Gully and Firth block, PDP, dated 5 December 2025, section 10

5.5.1 Conservation General Policy

251. The Conservation General Policy (**CGP**) was prepared under section 17C of the Conservation Act 1987 to provide unified policy for the implementation of a number of Acts listed in the First Schedule of the Conservation Act. It provides guidance for the administration and management of all lands and waters and all natural and historic resources managed for the purposes of the specified Acts, excluding reserves administered by other agencies under the Reserves Act 1977.
252. The CGP also provides guidance for consistent management planning for the wide range of places and resources administered or managed by DOC, including the preparation of conservation management strategies, conservation management plans and sports fish management plans.
253. CGP does not apply to reserves controlled and managed by an administering body i.e. Greater Wellington Regional Council administers Dry Creek Recreation Reserve. This is due to the definition of “public conservation lands and water” being:

Lands and water areas administered by the Department of Conservation for whatever purpose, including the natural and historic resources of those areas covered by this general policy. Reserves administered by other agencies are not included in this definition.

254. The CGP is considered to potentially apply (in future) to the DOC-Get sites but not the DOC-Give site for the purposes of this land exchange application.

255. Policy 6 states:

6. Changes to public conservation land

6(a) Land acquisition or exchange (including boundary changes) may be undertaken to manage, for conservation purposes, natural resources or historical and cultural heritage; or for the benefit and enjoyment of the public, including public access, where the land has international, national or regional significance; or where land acquisition or exchange will either:

- i. improve representativeness of public conservation land; or*
- ii. improve the natural functioning or integrity of places; or*
- iii. improve the amenity or utility of places; or*
- iv. prevent significant loss of natural resources or historical and cultural heritage; or*
- v. improve the natural linkages between places; or*
- vi. secure practical walking access to public conservation lands and waters, rivers, lakes or the coast; or*
- vii. achieve any other purpose allowed for under the relevant Acts.*

256. The policy sets out the appropriate circumstances for land acquisition or exchange. CGP Policy 6(a) is a three-limb test insofar as either the proposed exchange may be:

- *‘undertaken to manage, for conservation purposes, natural resources or historical and cultural heritage’ or*
- *for the benefit and enjoyment of the public, including public access, where the land has international, national or regional significance’ or*
- *where the land exchange will satisfy any one or more of the points listed in (i) – (vii).*

257. Starting with the first limb, the proposed land exchange meets this as the DOC-Get sites are natural resources and could be used for conservation purposes. "Conservation purposes" is not a defined term in either the Conservation Act or the CGP, however "conservation" is defined in the Conservation Act and the CGP as:

The preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations

258. This is a broad statement, but if the DOC-Get sites were to be transferred into DOC ownership, their intrinsic values would be not only maintained but improved through the revegetation, pest and weed control required by Conditions Package A. The achievement of the first limb is evidenced by the net gain in terrestrial fauna and landscape and natural character conservation values when Conditions Package A is taken into account.
259. The second limb is not relevant as the DOC-Get land does not have international, national or regional significance. While the Northern Gully contains ramarama which has a Nationally Critical threat status and contains a forest type (tawa-kāmahi) that is regionally classified as threatened, this is not *the land* per se.
260. Turning to the third limb, the proposed land exchange will achieve some of the clauses. Based on the DOC technical assessments, the DOC-Get sites would not achieve the matters in (i), (iii), (vi), (v) or (vii). The land exchange will achieve Policy 6(a)(ii) by providing for an improvement in the natural functioning of conservation land, in particular as Dr Burns evaluated the terrestrial fauna values of the DOC-Get sites as being slightly higher than the DOC-Give site. In addition, targeted weed and pest management and restoration planting will improve the natural functioning.
261. Policy 6(a)(iv) requires secure practical walking access to public conservation lands and waters, rivers, lakes or the coast. The public access proposed from Liverton Road would enable entry to the Southern Gully, and from there provide a connection through to the Northern Gully, both of which are currently inaccessible. The land exchange would therefore be consistent with this part of the Policy.
262. The proposed land exchange therefore achieves the first and third limb of CGP Policy 6(a).

5.6 Strategies and plans (cl 26(1)(f))

263. When considering a land exchange, the Panel must take into account any conservation management strategy, conservation management plan or reserve management plan that has been co-authored, authored or approved by a Treaty settlement entity.
264. Where these documents exist but were not co-authored, authored or approved by a Treaty settlement entity, the Panel may consider them (but is not required to) (cl 29(1)(b) of Schedule 6). Clause 26(1) requires this report to include information on these documents.
265. The following documents are potentially relevant:
- Wellington Conservation Management Strategy 2019
 - Toitū Te Whenua Parks Network Plan 2020-2030 management plan

5.6.1 Wellington Conservation Management Strategy 2019

266. The purpose of the Wellington Conservation Management Strategy is to describe the conservation values and issues for the Wellington region and how these will be managed by DOC. It recognises the partnerships, organisations and parties that collaborate to deliver the

four values of historic, natural, recreation and engagement. Given that the Wellington Conservation Management Strategy applies to lands, waters and resources managed by DOC,¹⁰⁶ but not to conservation land administered by an administering agency, this document is not considered to be relevant to the DOC-Give land (Greater Wellington Regional Council being the administering agency for the DOC-Give land). If the land exchange is approved and the DOC-Get sites transfer into DOC ownership, the Wellington Conservation Management Strategy will be relevant in future. It is therefore considered from this limited perspective.

267. The Wellington Conservation Management Strategy was not co-authored or approved by a Treaty settlement entity, although Treaty partners were consulted when drafting specific parts of the Strategy. The significance of this is that the panel *may* consider the Wellington Conservation Management Strategy.
268. Sections 2 and 3 contain overarching objectives and policies. Consistency of the DOC-Get sites with these is assessed in Table 10 below. The level of consistency is indicated by a negative, positive or zero for neutral.

	Land exchange without improvements / conditions	Land exchange with improvements set out in Conditions Package A	Comment
Objective 2.3.1 and Policies 2.3.2 Treaty relationships and tangata whenua involvement	+	++	The Cultural Values Assessment states that the land parcels are culturally significant as part of a wider landscape. The conditions enable opportunities to enhance cultural values through the exchange. involvement of mana whenua in the replanting, pest control and to have input into the Ecological Restoration Plan
Objective 3.1.1 and Policy 3.1.2 Maintaining and restoring the diversity of natural values	0	+	The land exchange itself will not change the biodiversity, however the revegetation and propagation of swamp maire (if successful) will improve the biodiversity and number of a threatened species. The weed and pest management required by the conditions will maintain and restore the diversity of natural values.

¹⁰⁶ Wellington Conservation Management Strategy 2019-2029, page 15

Objective 3.3.1 and Policies 3.3.2 Identify, provide and maintain a range of outdoor recreation opportunities on public conservation lands	-	+	While the DOC-Get sites are likely to be largely unsuitable for recreation due to topography and access difficulties, the public access from Liverton Road will enable entry to the Southern Gully and through this to the Northern Gully which are currently not accessible.
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Table 10: Consistency of the DOC-Get sites against the relevant objectives and policies of the Wellington Conservation Management Strategy 2019

269. Belmont Regional Park sits within the Wellington-Kāpiti Place, and section 10 of the Strategy sets out the outcomes and policies for this area. Of particular relevance is the following outcomes:
- The remnant reserves within this Place are actively protected. Threatened and at-risk species are secure in thriving ecosystems, especially where intensive pest management is occurring. The public and visitors encounter a diverse range of plants, lizards and birds, including kererū, kākāriki/red-crowned parakeet and North Island kākā, which migrate through ecological corridors established in partnership with PSGEs, tangata whenua and other conservation partners. The communities of Wellington-Kāpiti Place value conservation and the Department works with them to improve the state of indigenous biodiversity within the Place. They engage in a variety of biodiversity enhancement programmes, helping reduce pest plants and animals and protect threatened and at-risk species, both on and off public conservation lands and waters. PSGEs, tangata whenua, conservation partners, research organisations and the Department work together to achieve integrated management across public conservation lands and waters and adjoining land.*
270. Section 10.3 sets out policies for:
- Treaty of Waitangi relationships
 - Natural values
 - Historic values
 - Recreation.
271. Alignment with each of these policy areas is the same as set out above in Table 10. The DOC-Get sites will assist in achieving these objectives and policies.

5.6.2 Toitū Te Whenua Parks Network Plan 2020-2030 management plan

272. Toitū Te Whenua is the management plan for eight regional parks and forests and includes considerable detail for Belmont. This replaces all earlier park management plans, including the 1996 Belmont Regional Park Management Plan. The opportunities for the Belmont Regional Park include:

- a. Restoration, including opportunity for community-led restoration and predator free work;
- b. Master planning;
- c. Contributing to Greater Wellington Regional Council's climate change target through restoration;
- d. Heritage education opportunities;
- e. Development and promotion of key destinations in the park; and
- f. Natural heritage improvements through restoration of riparian areas.

273. The DOC-Give area proposed for exchange currently sits within Belmont Regional Park and is subject to the policies and direction set out in Toitū Te Whenua. The DOC-Get areas sit outside the Belmont Regional Park (unless and until a decision by the Minister to add the areas to the Regional Park is made if the exchange is approved by the Panel). Therefore these areas are not covered by Toitū Te Whenua Parks Network Plan. It cannot be assumed that they will become part of the Belmont Regional Park and therefore the provisions cannot be applied to the DOC-Get sites.

274. Section 7.3 is specific to Belmont Regional Park and sets out the key features and characteristics as well as opportunities. The following goals are relevant to the proposed land exchange:

Natural heritage Goal 1: Protect and restore high levels of terrestrial and freshwater ecosystem health to enhance biodiversity and ecosystem services

275. The DOC-Give site contains rare and threatened species including swamp maire and ramarama. The land exchange will not support the protection and restoration of these habitats.

Recreation experience Goal 2: Parks are highly accessible places for many visitors to enjoy; they offer a variety of interesting experiences, enhancing the health and wellbeing of local communities and broader regional economy

276. The DOC-Give site contains a 4WD track which will no longer be accessible for walking or cycling in the event of a land exchange. Mr Harbrow recorded several predator control lines and informal trails extending from this area down through bush that has regenerated in the decades since the area ceased to be farmed. These routes are marked with permatap or flagging tape. Mr Harbrow described these trails to be well used and maintained, with clear ground trails.¹⁰⁷

Cultural heritage features and landscape values Goal 3: A variety of landscape settings are preserved and enhanced reflecting social values; historic heritage features are protected and interpreted for visitors

277. The land exchange would mean that the archaeological site (R27/910) could not be accessed by the public, and therefore Goal 3 is partially achieved. The land exchange will have no impact on the presence of the archaeological site other than preventing public access.

Goal 4: Working collaboratively and consistently with others, we enable learning and build strong partnerships to deliver more conservation and recreation benefits for parks, people and communities

¹⁰⁷ Statement of advice on recreation, Michael Harbrow, dated 21 April 2026 at [23-24]

278. If the land exchange were to be approved, the DOC-Give site would no longer be accessible to the public. Goal 4 would therefore be difficult to achieve for the DOC-Give site.
279. There are a number of policies contained in Toitū Te Whenua, with varying degrees of relevance to the DOC-Give site and land exchange. The most relevant policies are assessed below in the context of the land exchange application.

Summary of relevant policies	Comments
1P To protect, restore and/or maintain healthy ecosystems	The land exchange is unlikely to achieve this policy as the weed and pest eradication work will cease to continue if the site transfers into private ownership. Currently it being undertaken by Greater Wellington and volunteers.
7P Protect and promote the health and extent of all indigenous flora, prioritising pest animal reduction, working collaboratively with others	
10P To protect and enhance habitat and extent for all native fauna , prioritising pest animal reduction, working collaboratively with others	
22P To maintain and prioritise public access for recreation and conservation activity use in parks	The land exchange will not achieve this policy because the DOC-Give land will not longer be accessible to the public
47P To identify, protect and preserve information and knowledge related to significant heritage sites	While the heritage site in the DOC-Give site remains, the land exchange would mean it is no longer accessible to the public.
48P To protect registered archaeological sites	
51P Considerations for an exchange	The conservation values of the DOC-Give site have been considered through this process.
57P To follow a mahi tahi partnership approach to working alongside mana whenua	Mana whenua have been engaged through this process, and the Cultural Values Assessment sets out the values associated with the DOC-Give site.

Table 11: Assessment of the most relevant policies of Toitū Te Whenua

280. Toitū Te Whenua classifies land / asset swap, disposal or acquisition for Belmont as a 'restricted activity'.¹⁰⁸ Primary consideration when making decisions is to be given to the land tenure and associated provisions in legislation for an area within the park. Policy 51P sets out 23 matters to consider when undertaking an exchange⁸¹.

¹⁰⁸ Toitū Te Whenua Parks Network Plan 2020–30 at page 190 (<https://www.gw.govt.nz/assets/Documents/2022/05/Parks-Network-Plan-2020-30-3.0.pdf>).

5.7 Conditions (cl 26(1)(g))

Conditions included with the application

281. This report must include information about any conditions that should be imposed in accordance with clause 31 or 32 of Schedule 6, or section 84, as well as being required to specify any conditions of those specified under section 78 that the Panel must impose in accordance with clause 33.
282. The Applicant proffered conditions (which form part of the exchange proposal) on the following matters:
- a. Separating the individual titles by obtaining a subdivision consent.
 - b. Preconditions:
 - Review and approval of the survey plan
 - Outlines the encumbrances and covenants to remain on the titles
 - Installation of 60 m of fence set back 6 m from the Firth Block pit face
 - Full discharge/withdrawal of Encumbrance for Vegetation Protection from Hutt City Council
 - Costs to be met by the Applicant
 - Registration of an easement (Right of Way) for the purpose of conservation activity and maintenance undertaken by DOC or its agents
 - c. Conditions:
 - The land being given by the Crown will be subject to no reservation, classification, interest or encumbrance
 - Outlines the encumbrances and covenants to remain on the titles
 - The Applicant must undertake the following improvement works for a period of five years
 - Northern Gully: 5.7 ha of pest animal management (goat and possum) control in the Northern Gully Tawa-Kāmahī Northwestern Forest and Eastern Pukatea Forest and 6.3 ha of weed management of old man's beard, tradescantia and exotic canopy trees and pest management (possum) in the Northern Gully Cottle Block.
 - Southern Gully: Undertake 3.6 ha weed control, and plant swamp maire, in the Southern Gully block.
 - Dry Creek: weed control over an area of 1.85 ha, and replanting of native species over an area of 0.80 ha.
 - Firth QEII Block: 9.6 ha of pest management including targeted rodent control around the water body boarding the Park, OBDA and Firth Block (Farm Pond) for a period of 10 years.
 - Active indigenous re-vegetation of 10 m band along quarry edge with Olearia, kāmahī and kānuka mix
 - Development of an Ecological Restoration Plan in consultation with Taranaki Whānui ki te Upoko o Te Ika and integrate mātauranga Māori measures alongside ecological science to guide monitoring and restoration.
283. It is noted the conditions do not reflect the improvements proposed by the Applicant as set out in the Land Exchange report. For example, the physical works for Dry Creek are described as:¹⁰⁹

¹⁰⁹ Ecology report, BlueGreen Ecology dated December 2025, page 90

- a. Drill and fill large exotic trees (*Acacia* spp);
- b. 2 x rounds (spring and autumn) of *C. vitalba* vine control work per year for five years. Hand pulling young vines and cutting and pasting established vines.
- c. Knapsack spray exotic weed species within the weed management area.
- d. Supplementary planting of 0.8 ha. An estimated 7,000 plants.

284. It may be that this level of detail is intended to be set out in the Ecological Restoration Plan, but it was not reflected in the conditions proffered.

Conditions proposed by DOC in the Draft Land Exchange Report

285. In the draft Land Exchange Report, DOC provided a revised set of suggested conditions – both as pre-conditions and conditions. The key additions to the pre-conditions included:

- a. A draft process for the survey plan to provide sufficient time to review and make changes if necessary.
- b. Deleting the requirement to vest the sites as a reserve subject to the Reserves Act 1977 as that is a future decision under clause 34(2) of Schedule 6 which cannot be fettered through this process.
- c. Inclusion of a condition requiring full discharge / withdrawal of Encumbrance for Vegetation Protection over Part Lot 1 DP22561.
- d. The requirement to survey (as well as register) the appropriate easements.
- e. Inclusion of bonds to ensure that the improvements offered (and conditioned) are successfully implemented, but also to cover monitoring costs and any risk to DOC.
- f. Rewording of conditions to be SMART¹¹⁰ that are clear and enforceable.
- g. Reframing of the Ecological Restoration Plan and Mammalian Pest Management Plan to clearly set out the process and content of each.
- h. Increasing the requirements for pest management.
- i. Setting clear levels for weed management.
- j. Increasing the minimum number of swamp maire specimens to a rate of 200 plants per specimen (resulting in a replacement level of 1,800 plants with a survival rate of 90%.
- k. Clarity around the appropriate species for restoration planting including ramarama.
- l. Strengthened conditions for developing the Ecological Restoration Plan in consultation with Taranaki Whānui ki te Upoko o Te Ika and capturing feedback.
- m. A process for agreeing the design of the fence in close proximity to the quarry face to the Firth Block for safety and to minimise risk.

286. DOC proposed the following amendments to the conditions also:

- a. Requirements to ensure activities are undertaken in accordance with the approved Ecological Restoration Plan and Mammalian Pest Management Plan.
- b. Additional conditions provide specificity about the restoration planting.
- c. Requirement to remove rubbish from the sites including drums and refuse from past uses.

287. DOC specified s 78 conditions that must be imposed regarding the following matters:

- a. Contaminated land.
- b. Fencing.
- c. Rates.

¹¹⁰ Stands for Specific, Measurable, Achievable, Relevant and Time-bound

- d. Continuance of rights.
- e. Withdrawal by agreement.
- f. Existing structures.
- g. Biosecurity Act.
- h. First right of refusal.
- i. Costs.
- j. Encumbrances.

Conditions Package A

288. In response to the Draft Land Exchange Report, the Applicant responded with a substantially revised set of conditions (Conditions Package A) that adopted many of the concepts proposed in DOC's conditions (albeit with different wording in places). The key matters addressed by the conditions are as follows:

Pre-conditions:

- a. A process for finalising the survey plan
- b. Enabling transferral including encumbrances, consents and approvals
- c. Installation of a fence set back 6 metres from the Firth Block pit face
- d. Costs
- e. Access easement Z for conservation activity, maintenance and public pedestrian access to Southern Gully
- f. A bond up to a maximum of \$200,000
- g. Boundary fencing
- h. Structures and improvements
- i. Preparation of an Ecological Restoration Plan which includes:
 - i. Planting 200 swamp maire in the Southern Gully
 - ii. Weed management for five years but only for certain species
 - iii. Planting of approximately 7,000 plants in Dry Creek, of which 500 will be ramarama;
 - iv. Planting of 1000 kamahi and 1000 kanuka in Firth Block.
- j. Preparation of a Mammalian Pest Management Plan which includes pest management for ten years for certain species

Conditions:

- k. Further detail for restoration planting;
- l. Further detail for pest management;
- m. Contaminated land identification and remediation;
- n. Contaminated land investigation of the discrete area identified in the Northern Gully; and
- o. Continuance of rights and obligations.

289. The Applicant also provided an alternative version of conditions (Conditions Package B) which is discussed in section 9 of this report.

5.7.1 Conditions proposed by DOC

290. In terms of this section, DOC has compiled a set of conditions that it would recommend if the Panel were minded to approve the land exchange, based on the Applicant's Conditions Package A as a starting point. To be clear, they are not put forward on the basis that they will satisfy the relevant tests in the Act, including clause 29(2) of Schedule 6. Rather, the conditions are put forward as required by clauses 26(1)(g) and 26(2).

291. It is for the Panel to consider whether the tests in the Act, including clause 29(2) (whether the new or old provision) are met by the proposed exchange.
292. In developing the pre-conditions and conditions, DOC has been mindful of s 83 of the FTAA and the requirement for conditions to not be more onerous than necessary to address the reasons for which they are set. In its review of the conditions, DOC has ensured they are SMART¹¹¹ conditions that are clear and enforceable.

5.7.1.1 Clause 31 preconditions

293. Clause 31 of Schedule 6 relates to preconditions for land exchange:
- (1) *For the purposes of sections 81 and 86,—*
 - (a) *a Panel may impose a condition that the applicant—*
 - (i) *obtain any resource consent or other matter necessary to enable the land exchange to be effected:*
 - (ii) *obtain any agreement with the holder of an interest in land:*
 - (b) *if the agreement of the holder of an interest in land is required for the land exchange to be effected, the Panel must impose a condition that the applicant obtain that agreement:*
 - (c) *if the land offered by the applicant is of lower market value than the land to be given by way of exchange by the Crown, the Panel must impose a condition that the applicant pay an amount of money to the Crown to offset the inequality.*
 - (2) *No condition may be imposed in accordance with subclause (1) requiring the payment of money by the Crown to offset any inequality between the market value of the land to be acquired by the Crown and the land to be given by way of exchange by the Crown, and nothing in this Act otherwise requires such a payment...*
294. DOC has proposed a number of additional pre-conditions to the set proffered by the Applicant. Each of the changes is outlined below and the reasons. The additional pre-conditions are considered necessary to enable the land exchange to be effected in accordance with clause 31(1)(a)(i) of Schedule 6.
295. The Applicant has in its legal memorandum challenged the extent of pre-conditions. This is not accepted and DOC consider that the pre-conditions are reasonable and necessary.
296. In light of clauses 31 and 32, DOC recommends a reorganisation of the conditions to better align with the requirements of the Act. To avoid confusion, where a specific condition is referred to, the number is that in the condition set allocated by DOC. The former numbering of the conditions as it was attributed by Winstone in its set dated 15 June 2026 is shown struckthrough in [Appendix 8B](#).

Survey plan

297. DOC supports a two stage process for developing and finalising the survey plan. A draft process will enable any issues to be resolved and will make for a smoother finalisation process. DOC considers 20 days is an appropriate and achievable length of time for considering the draft survey plan and providing feedback. DOC does not consider that

¹¹¹ Stands for Specific, Measurable, Achievable, Relevant and Time-bound

Condition 1 needs to set out the scope of the comments provided given that the purpose of this condition is very narrow already - that is, to create a survey plan.

298. DOC has amended Condition 2 to outline the process for finalising the survey plan more clearly. DOC prefers the wording “make best endeavours” rather than “acting reasonably” which implies that the behaviour of the Minister or the Minister’s delegate is something that needs to be conditioned. DOC considers 20 days is an appropriate and achievable length of time for considering the final survey plan. DOC does not support deeming approval, particularly when there is a timeframe built into the condition.
299. The setting out of encumbrances and interests is supported in Condition 3. Minor amendments are recommended to use consistent language. DOC considers there are two separate parts to Condition 3 and therefore recommends splitting them into two conditions.
300. Condition 30 is recommended for deletion as it duplicates Condition 3.
301. Condition 5 is intended to enable the Crown Land to be transferred to the Approval holder as fee simple land, free of encumbrances and without reserve classification on Gazettal. DOC recommend replacing the condition with wording that is clearer and more simply framed. It also recommends separating the condition into two separate conditions.

Encumbrances

302. Condition 6 is a s78 condition, with a slight amendment to use a defined term. It is uncertain whether this is a pre-condition or condition. Given that it requires an action in advance of the land exchange, it has been located as a pre-condition.

Easements

303. Condition 7 is supported, particularly as it enables public access to the Southern Gully.

Costs

304. DOC supports Condition 8 which relates to which party covers the costs, but considers there is no need to include the word “reasonable” as this introduces uncertainty.

5.7.1.2 Clause 32 conditions

305. Clause 32 of Schedule 6 provides for other conditions a Panel may impose.
- (1) *The Panel may grant a land exchange subject to a condition that—*
 - (a) *the land being given by way of exchange by the Crown will be subject to a reservation, classification, interest, or encumbrance specified by the Panel;*
 - (b) *the applicant is required to undertake or bear the cost of any improvements to the land acquired by the Crown that the Panel thinks necessary as part of ensuring that the land exchange will enhance the conservation values of conservation areas and Crown-owned reserves considered as a whole.*
 - (2) *The Panel may impose any condition to address impacts on any person who has a right to use the land, but the condition must not include the requirement for the applicant to obtain the person’s agreement to the land exchange.*
306. Clause 29(2) Schedule 6 of the FTAA (as amended by the FTAAA see the above discussion) provides that the Panel must not grant the approval unless the Panel is satisfied that the land

exchange (including any money that may be received and any conditions that the Panel may impose) will enhance the conservation values of conservation areas and Crown-owned reserves considered as a whole. It is noted, as referred to above, that at the time the application for exchange was made, this provision stated “land managed by the Department of Conservation.” This wording was expanded to ensure it included Crown-owned reserves. For the purpose of this report, as also set out above, it does not materially impact on the assessment of values undertaken above. This report is prepared under the law as it existed when the application was filed, however, the nature of the criteria in clause 26 in particular put the Panel in the position of being able to apply and consider the law as it stands when the substantive assessment is made.

307. The conditions proffered by the Applicant in Condition Package A have been amended by DOC in collaboration with the technical advisors to ensure that the improvements offered translate into measurable and enforceable conditions. In particular the conditions for pest management did not have any measurable or certain levels. Following on from the preconditions, DOC supports the adoption of SMART conditions for ecological restoration and management of animal pests. The conditions require the Applicant to undertake the activities in accordance with the approved Ecological Restoration Plan and Mammalian Pest Management Plan.

Definitions

308. DOC considers that the definitions included are helpful and provide a consistent set of terms to use in the conditions.
309. A definition of “Conservation Improvement Works” is included as this provides additional clarity to the bond conditions.

Costs

310. Conditions 10 – 12 are s78 conditions and therefore must be amended for consistency with the approved wording.

Bonds

311. The legal submissions by the Applicant consider there is no lawful ability under the Act for a bond condition to be imposed. However, cl 32(1)(b) enables conditions that require the applicant to bear the cost of any improvements to the land acquired by the Crown that the panel thinks necessary as part of ensuring that the land exchange will enhance the conservation values of conservation areas. A bond is precisely that – a cost of the improvements offered in the event that the Applicant does not fulfil the conditions. The wording proposed by Winstone sets out the works to which the conditions relate; that is, weed clearance, native planting, fencing, removal of rubbish, pest-management and any other works required under these conditions the Approval holder is required to undertake at its cost. DOC’s intention was that the bond cover the risk of these works not being carried out, particularly as they are an important part of the Applicant’s stated gain in conservation values.
312. DOC proposes deletion of the cap in Condition 12 as there is no analysis to support this being a value that the “Conservation Improvement Works” will not exceed.
313. DOC considers that a more certain and clear way of framing the bond is to refer to the minimum requirements in Tables 1, 2 and 3, removal of rubbish, pest-management and any other works required under these conditions the Approval holder is required to undertake at its cost. A release schedule seems reasonable, but the appropriate trigger for the release of

the first 50% is meeting the minimum success rates in accordance with Table 1, 2 and 3 after 7 years. Seven years is the timeframe for the planting of the swamp maire.

314. DOC suggests restructuring the condition to have the conditions relating to drawing on the bond as separate conditions. An additional condition is recommended to make it clearer when the bond can be drawn upon.

Fencing

315. In terms of boundary fencing, there is a s78 condition for this matter. The Applicant proposes a more narrow Condition 15 which requires fencing to be constructed where reasonably necessary to exclude persons, meet any existing covenant requirement, or address an identified safety risk. DOC can see the value of a tailored condition for fencing but suggests the inclusion of fencing to keep stock out of the DOC-Give sites which is consistent with the requirements of the QEII covenant. DOC considers there is no need to include the words “acting reasonably” and this introduces uncertainty into the condition.
316. Condition 16 requires the Approval holder to install a fence along part of the quarry face against the Firth block. DOC supports the requirement for a barrier to be constructed to keep people away from the area that is subject to instability associated with the quarry face. However DOC proposes the fencing requirement be extended further north along other quarry earthworked areas which are very close to the Firth Block boundary, and an approval process for the location and design. In the absence of a detailed design being set out in the conditions, DOC recommends inserting a requirement for the design to be submitted for its approval. It is important that this fence is appropriately designed for safety and to minimise risk, particularly given that the purpose of the fence is public safety and future liability for public safety on the Firth Block will be DOC’s responsibility. This will also enable the risk to vegetation to be minimised – a concern that was expressed by the comments from QEII Trust. DOC recommends including references to the Geotechnical Appraisal report rather than the Boffa Miskell diagram as it provides additional information. Because of the risks of geotechnical instability, clear signage is required to reduce the risk to people. DOC also proposes that Winstone be required to make good any issues with instability resulting in the future from the quarry activity.

Biosecurity Act

317. This is a s78 condition which requires the land to be transferred to the Minister to be compliant with any applicable “good neighbour” rules under the Biosecurity Act. The Applicant considered this condition to be redundant and more onerous than is necessary. It considered that may be replicating an existing legal obligation on Winstone under the Biosecurity Act and is therefore unnecessary. DOC consider that the condition is appropriate and does not impose any unreasonable requirements.

Rates

318. Condition 18 is a s78 condition which DOC requires be imposed.

Structures and improvements, condition of land

319. Conditions 19 and 20 are s78 conditions which DOC requires be imposed.
320. For Conditions 21 and 22, DOC prefers the equivalent wording of the s78 condition as they are clearer. Consequently DOC requires that they be imposed.
321. A number of assessments including that undertaken by Pattle Delamore Partners identifies rubbish in the Northern Gully. There may well be other areas where dumping has occurred

that DOC and the Applicant are unaware of. DOC prefers the replacement wording proposed for Condition 23 as it reduces the liability to DOC should further areas where dumping has occurred and rubbish is discovered.

322. Given the potential instability issues identified by the Applicant's Geotechnical Assessment, Condition 24 requires the Approval holder to take all steps reasonably necessary, at its own cost, to ensure that the stability of the Firth Block will not be undermined.

Rights of first refusal

323. DOC requires adding in Condition 25 which is a s78 condition. It covers any rights of first refusal obligations that may be triggered by the land exchange process.

Ecological Restoration Plans and Mammalian Pest Management Plan

324. DOC supports the concept of the Ecological Restoration Plan which covers both weed management and revegetation, and a Mammalian Pest Management Plan which targets eradication of animal pests. It supports a consistent structure comprising:
- a. a clear statement of purpose or objective;
 - b. matters that the management / restoration plan must address in order to achieve the purpose;
 - c. a list of information that must be included;
 - d. direction on who prepares the management / restoration plan;
 - e. a process for DOC to approve the management / restoration plan;
 - f. identification of parties that must be consulted during the preparation of the management / restoration plan and a process for documenting any feedback received and the responses to that feedback (where appropriate);
 - g. process for amending the management / restoration plan; and
 - h. a requirement for activities to be undertaken in accordance with the approved management / restoration plan.
325. Further consideration of Clause 31 indicates that these conditions are most appropriately located as conditions. The Applicant proposes that the management / restoration plans are certified by a suitably qualified and experienced ecologist but DOC prefers that they be approved by DOC. This provides a level of certainty that the outcomes for weeds, revegetation and pest management can be achieved (and how they will be achieved). DOC supports the implementation of the management / restoration plans being a clear requirement.
326. DOC recommends making the requirements more clear such as "minimum" targets for weeds and success rate for restoration planting. DOC considers that all weed species should be targeted, but accepts that the key weed species for each site have been accurately listed. DOC supports ten years management of weeds and timeframes that range between 3 – 7 years for restoration planting.
327. Given the threatened status of swamp maire and that it is a taonga species, DOC accepts that a measurable improvement of the Southern Gully would be the establishment and survival of at least 180 swamp maire specimens (being 90% of 200). It is important that these be eco-sourced and DOC has added words to that effect.
328. DOC supports the species identified for planting in Dry Creek for clarity, of which 500 are ramarama.

329. DOC supports the proffered condition which requires the Applicant to develop the Ecological Restoration Plan in consultation with Taranaki Whānui ki te Upoko o Te Ika, and the addition of Te Rūnanga o Toa Rangatira. To ensure all feedback received from Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira is captured, DOC supports the requirement to record all feedback and outline how it has been reflected in the Ecological Restoration Plan. DOC considers this will enable mana whenua to have meaningful input into the document and recognises their kaitiaki role.
330. DOC consider it is important that the Approval holder covers the costs of DOC, Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira performing their roles in these processes. The Applicant recognised the importance of the management / restoration plans in enhancing the conservation values, and therefore it is a cost of those improvements in accordance with cl 32(1)(b).
331. DOC considers that the former Conditions 26 and 27 (now 40) need to be combined as they are part of the same package.
332. DOC considers that the “response triggers” for Table 3 are unclear and unenforceable. They are framed by Winstone as targets rather than triggers. Not only is there a lack of specificity about the targets, but it is not clear whether the contractor observations would result in an increase or decrease in trapping and baiting efforts. For this reason, DOC prefer more certainty about what the targets for pest levels are.
333. The longer the duration of pest control, the more confident DOC is that the land is in better ecological condition than when it was exchanged. Dr Ussher observed that if the goal is to provide assurance of measurable gains to seed survival, seedling germination, and bring about positive changes to understorey composition, then a longer period of sustained control is probably needed, for example 20 years.¹¹² While a longer duration of pest management would be ideal, DOC supports ten years of pest management at a minimum.
334. The conditions also set out a process if the management / restoration plans need amending. This allows a level of adaptive management – if the yearly reporting is showing that the requirements for weed management, revegetation or management of animal pests are not being achieved, then the plans can be amended to increase the efforts or use alternative methods. DOC considers it appropriate that DOC be involved in the approval process rather than delegating this to a suitably qualified and experienced ecology, and the conditions set out a process for this.
335. DOC has added specificity about the restoration planting – namely that the successful establishment of the plants is supported by the use of slow-release fertiliser and the plants must be planted with mulch (but this is not required for planting wetlands). This will give the plants the best chance to become established.
336. DOC also recommends amendments for the annual reporting requirements to make these clear.
337. Mr Harbrow recommended that the wetland areas and the vulnerable roots of the new plantings of swamp maire and other species are protected from visitors to the Southern Gully. This has been included as a matter for the Ecological Restoration Plan to address.

¹¹² Review of Winstone Aggregates and DOC assessment reports on ecology matters, Dr G. Ussher, dated 14 June 2026, page 6

Contaminated land

338. The Applicant has included a complex set of conditions that require contaminated land investigation. DOC is concerned that the current drafting of those conditions provide no certainty that any contamination will be remediated and to what level. The definition of “land covered / piece of land” in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 is narrow and DOC is concerned that this may limit the identification and remediation of contamination. DOC considers that the s78 condition is more appropriate and provides more certainty to DOC. DOC therefore requires that the s 78 condition relating to contaminated land be imposed.
339. In addition, the potentially contaminated area in the Northern Gully was discovered by chance during site visits. It was not the result of targeted and methodological surveys. There may be further historic dumping in the Northern Gully and therefore DOC does not support limiting it to the area identified in the Pattle Delamore Partners memorandum.

Continuance of rights

340. This condition is consistent with the s78 condition and is required to be imposed by DOC.

Signage

341. Condition 50 has been added which requires the construction and installation of signage indicating the ownership of each DOC-Get site and right of access.

5.7.2 Conditions relating to Treaty settlements and recognised customary rights

342. Section 84 provides that the Panel may set conditions to recognise or protect a relevant Treaty settlement and any obligations arising under the Marine and Coastal Area (Takutai Moana) Act 2011 or the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019.
343. While there are no conditions necessary for Treaty settlements and recognised customary rights, DOC supports the condition which requires the Applicant to develop the Ecological Restoration Plan in consultation with Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira. The strengthened conditions which require the feedback and input to be recorded will effectively recognise their kaitiaki role and ensure they have a role in guiding restoration and increasing the conservation values.

5.7.3 Section 78 conditions that must be imposed

344. Section 78 establishes that the Minister of Conservation may specify conditions that a Panel may be required to impose on a land exchange approval. Pursuant to clause 26(2) of Schedule 6, this report must specify any such conditions that the Panel must impose in accordance with clause 33. The Minister of Conservation has specified a suite of conditions relating to exchanges. These are set out on pages 24 to 27 of a Briefing to the Minister which has been tabled in the context of other fast-track projects for which DOC has required section 78 conditions be imposed¹¹³. Conditions that DOC requires be imposed in accordance with section 78 are outlined below.

¹¹³ See [25-B-0187 SIGNED Briefing Fast Track Approvals - Mandatory Section 78 conditions - Redacted.pdf](#).

Encumbrances (Condition 6)

345. This condition ensures that the DOC-Get sites are discharged from all mortgages, charges, and other encumbrances other than the QEII covenant 5-07-755.

Costs (10-12)

346. There are also s78 conditions requiring all costs associated with the Exchange Agreement to be met by the Applicant.

Biosecurity Act (Condition 17)

347. This condition requires that the DOC-Get land is compliant with any “good neighbour” rules under the Biosecurity Act prior to the settlement date.

Rates (Condition 18)

348. This condition requires no apportionment of rates or other outgoings paid by the parties.

Existing structures (Conditions 19-22)

349. These conditions apply to both parties in that the DOC-Give site is on an “as is, where is” basis. It also outlines that the Minister accepts no liability in relation to structures or improvements on the DOC-Give site. Any structures are required to be removed from the DOC-Get land, including any reinstatement required as a result.

First right of refusal (Condition 25)

350. This condition requires the Approval holder to waive any first right of refusal or similar obligations in terms of the DOC-Get land.

Contaminated land (Condition 44)

351. While the rubbish and potential contamination of the Northern Gully waterway is known, Condition 44 is to address the risk of previously undiscovered contaminants present.

Continuance of rights (Condition 48)

352. This condition enables the rights and obligations of the parties to continue beyond settlement.

6 Section 35(4) matters

353. Section 35(4) sets out matters that this report may include advice on which are discussed further below.

6.1 Effects of Treaty settlements and other obligations on decision making

354. Section 82 applies if a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011 or Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 is relevant to an approval. It provides that if the settlement or Act provides for the consideration of any document, the Panel must give the document the same or equivalent effect through its decision making as it would have under any relevant specified Act (in this case the Reserves and/or Conservation Act). In this context, “document” means any document, arrangement or other matter, and includes any statutory planning document amended as a result of the settlement or Act.

355. In addition, section 82 requires the Panel to consider whether granting the land exchange would comply with section 7. This requires all persons performing and exercising functions, powers and duties under the FTAA to act in a manner that is consistent with obligations under existing Treaty settlements¹¹⁴ and customary rights recognised under the Marine and Coastal Area (Takutai Moana) Act 2011 or Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019.

6.2 Obligations relating to Treaty settlements and recognised customary rights

356. There are two Treaty settlements of relevance:

Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009

357. Cultural Redress Protocol with DOC is set out in Schedule 2 of the Deed of Settlement (19 August 2008) and acknowledged in the Act under section 29.
358. While Right of First Refusal regime is provided for, it does not include the Belmont Regional Park parcels proposed for exchange.

Ngāti Toa Rangatira Claims Settlement Act 2014

359. The Statutory Acknowledgment and Deed of Recognition for the Hutt River and tributaries are relevant insofar as the proposed exchange area includes waterways. The Act has provisions relating to the transfer of reserves land, but they all appear to be linked to specific cultural redress sites and does not include the Dry Creek Recreation Reserve or Belmont Regional Park.

7 Treaty of Waitangi considerations

360. The Conservation Act, among other things, establishes the Department of Conservation. Section 4 of the Conservation Act outlines that the “*Act shall be ... administered as to give effect to the principles of the Treaty of Waitangi*”.
361. Based on the information provided in the application for land exchange, the Applicant has engaged meaningfully with mana whenua including Taranaki Whānui Ki Te Upoko O Te Ika, Ngāti Toa Rangatira Te Āti Awa Nui Tonu, Rangitāne Tū Mai Ra, and Muaūpoko. Two relevant Treaty Settlement deeds apply, and ongoing engagement is continuing to ensure cultural interests are woven into the design and respected.
362. The DOC-Give site is described through a mātauranga Māori lens as forming part of the Belmont landscape that holds enduring cultural association through whakapapa, identity, and kaitiakitanga responsibilities. The land is connected to the wider catchment system and reflects the principles of Ki Uta Ki Tai, where gullies, and waterways are understood as an interconnected whole.
363. The DOC-Get sites hold comparable cultural value at present with the DOC-Get site. Their current state reflects limited cultural visibility and constrained access, with few opportunities for mana whenua to exercise kaitiakitanga in an active and visible way. The proposed improvements package provides a pathway to uplift these values through targeted restoration and management. The cultural values assessment considers that the DOC-Get sites provide an opportunity to restore and improve the land and thereby give effect to kaitiakitanga.¹¹⁵

¹¹⁴ Means Treaty settlements that exist at the time the relevant function, power or duty is performed or exercised

¹¹⁵ Cultural Values Assessment, Hikoiki Management Limited dated December 2025, page 10-11

364. Mana whenua considers that the exchange alters tenure but does not diminish the enduring relationship of mana whenua with the Belmont landscape. That relationship continues regardless of ownership. Cultural values remain present across the land and can be bolstered through initiatives that strengthen mana whenua presence, in particular the planned weed management programme at Dry Creek.
365. The cultural values report included with the application identifies opportunities to enhance cultural values through the exchange, including:¹¹⁶
- a. Weed management at Dry Creek – improving the health of indigenous vegetation and strengthening catchment care.
 - b. Co-lead restoration opportunities – involvement in planning and delivery of works to ensure cultural approaches guide outcomes.
 - c. Cultural indicators – applying mātauranga Māori measures alongside ecological science to monitor the condition of vegetation, water, and soils.
 - d. Application of Ki Uta Ki Tai – recognising the interconnection of uplands, waterways, and lowlands when planning and implementing management actions.
366. The cultural values assessment sets out opportunities to strengthen cultural values where mana whenua involvement is embedded in access, restoration, and interpretation.¹¹⁷
- DOC-Give Block:
- No cultural enhancements proposed
 - Cultural values remain as existing associations and responsibilities without additional expression or visibility
- Northern Gully:
- Pest management: opportunity for mana whenua to shape the targeted pest management programme and provide hands on delivery and monitoring where appropriate.
- Southern Gully:
- Weed and pest management: opportunity in both areas for mana whenua role in developing and implementing where appropriate.
 - Cultural harvest opportunity: to ethically harvest fallen Swamp Maire materials for cultural practices
- Firth Block:
- Active indigenous re-vegetation: opportunity for mana whenua to provide cultural oversight on how the active revegetation area is implemented and monitored. Identification of taonga species.
 - Pest management: opportunity for mana whenua to shape the targeted pest management programme and provide hands on delivery and monitoring where appropriate.
- Dry Creek:
- Active indigenous re-vegetation: opportunity for mana whenua to provide cultural oversight on how the active revegetation area is implemented and monitored. Identification of taonga species.

¹¹⁶ Cultural Values Assessment, Hikoiki Management Limited dated December 2025, page 1

¹¹⁷ Cultural Values Assessment, Hikoiki Management Limited dated December 2025, page 14-15

- Weed management: opportunity for mana whenua role in this programme.

367. The comments on the exchange application provided by Taranaki Whānui ki te Upoko o te Ika noted the comprehensive engagement on the proposed land exchange. The issues captured in the Cultural Values Assessment and the associated improvements package prepared for the application are still relevant.
368. Te Rūnanga o Toa Rangatira expressed a neutral position to the proposed land exchange. It cautioned that DOC must be satisfied that the exchange results in a genuine conservation gain, with clear evidence that the values of the land received exceed, or appropriately offset, those of the land being relinquished. The feedback addressed the importance of ecological function, including the habitats, hydrological characteristics, species composition and regeneration potential. It noted the vulnerability of swamp forest and consideration of the regional scarcity of such ecosystems, and that swamp maire is a taonga species.
369. Te Rūnanga o Toa Rangatira stated that the proposed land exchange does not alter the enduring relationship of mana whenua with the Belmont landscape. Kaitiaki responsibilities remain irrespective of land tenure. Based on the cultural values assessment, the DOC-Get sites appear to provide opportunities for partnership and active kaitiakitanga which accords with the principles of the Treaty of Waitangi. These opportunities can be increased by the improvements offered and conditions imposed.

8 Comments received

8.1 Comments on the Application

370. Of those invited to comment on the land exchange application, sixteen parties responded and their responses are available through the link included in [Appendix 1](#). In accordance with s 35(2), the Applicant was required to provide any responses to the invited comments received by 5 March 2026, which it did. A summary of the Applicant's responses is included in [Appendix 2](#).
371. There was a mix of comments supporting, opposing and neutral. A summary of the main themes is outlined below.

Support for the land exchange

372. Firth Industries and Fulton Hogan expressed full support for the land exchange and the continued operation of Belmont quarry.

Neutral position

373. Greater Wellington Regional Council expressed a neutral position. It attached information provided by Friends of Belmont Regional Park, Wellington Botanical Society and Dr Colan Balkwell.
374. Similarly Hutt City Council, Te Rūnanga o Toa Rangatira and QEII Trust also stated a neutral position.

Conservation values

375. Commenters such as Friends of Belmont Regional Park and New Zealand Conservation Authority consider that there is no net increase in conservation values and therefore the land

exchange cannot be approved. The land exchange would be a net loss to biodiversity and conservation values in the Wellington region.

376. Te Rūnanga o Toa Rangatira considered that DOC must be satisfied that the exchange results in a genuine conservation gain, with clear evidence that the values of the land received exceed, or appropriately offset, those of the land being relinquished. It recommended DOC evaluate the ecological function of the habitats involved, including hydrological characteristics, species composition and regeneration potential.
377. The Wellington Botanical Society questioned the 'net ecological gain' from destroying 24 healthy in-situ swamp maire trees, along with their habitat, and replacing them with 200 young plants to be managed for five years. They consider the proposal to be a net loss to biodiversity in the Wellington region.
378. The Wellington Conservation Board considers that landscape-scale ecology within the park, and surrounding catchment, would be helpful in considering the overall conservation impact of the proposal.

Value of the DOC-Give site

379. Commenters such as Friends of Belmont Regional Park and Wellington Botanical Society consider that the DOC-Give site has significant biodiversity, harbours several nationally threatened species, and has a long history of natural regeneration. They considered that the Applicant's ecological assessment of the DOC-Give site rested on inadequate ecological surveys and missed the key values. New Zealand Conservation Authority raised concerns that the ecological assessment downgraded the values present in the DOC-Give site.
380. Wellington Botanical Society consider that the ecological report underrepresents the biodiversity value of the DOC land and overstates that of the Winstone Quarry.

Effect on recreation

381. Comments received considered that the DOC-Get sites cannot be used for recreation and are not equivalent to the recreation values of the DOC-Give site. Commenters consider that the DOC-Get sites are not suitable for recreation, resulting in a reduction of public access and recreational opportunities. Constraints to the DOC-Get site for recreation include lack of access, the state of the parcels and steep terrain. The recreation assessment misrepresents the actual recreation usage and value of the DOC-Give site and there is significantly more use than recorded.
382. New Zealand Conservation Authority considers fragmentation of the DOC-Get sites will affect the recreational values of the area. It questions the opportunities and costs for enabling recreation on the DOC-Get parcels.
383. Friends of Belmont Regional Park observed that the FTAA does not allow perspectives from the public users of the DOC-Give site and adjoining areas.

Inclusion of the QEII covenanted sites

384. The Friends of Belmont Regional Park expressed concern at the inclusion of the ecological values (in particular) of the QEII covenanted areas. They consider their conservation value was created when they were first protected under a QEII covenant and cannot be created a second time. Excluding them would reduce the ecological values of the DOC-Get sites and the total area.

385. The comments noted that the ecological value relies in large part on the values of the areas protected by a QEII covenant in perpetuity. They consider these areas cannot be considered to add conservation value; neither can they offer any recreation value.
386. QEII Trust set out the purpose and objectives of the covenant. QEII Trust stated that regardless of its ownership status, QEII will continue to monitor open space covenant 5-07-755 and ensure its purpose and objectives are upheld.

Perimeter length

387. Commenters observed that the DOC-Get sites have a considerably longer boundary than the DOC-Give site and therefore increases the incursion of invasive species and results in a generally poor ecological outcome. The issues include management of incursions of weeds and pest species/predators from neighbouring private owners, who may or may not be operating weed and pest control measures that harmonise with those proposed for the DOC-Get land. Pest and weed control will have on-going associated financial implications for the Crown.

Fragmentation and discrete parcels

388. Commenters observed that the DOC-Get land being in separate parcels raises questions about the ability of these parcels to serve as corridors for species.

Loss of valuable and threatened species and wetlands

389. A number of commenters expressed concern at the loss of swamp maire, ramarama *Comprosmia rubra*, *Carex maorica* and perched inland wetland areas which support these populations. Natural inland wetlands are regionally rare (<3% remaining regionally). Commenters expressed concern at the ecological importance of these species and features.
390. Te Rūnanga o Toa Rangatira recommended that DOC's assessment explicitly considers the regional scarcity of such ecosystems, including swamp maire as a taonga species.
391. Wellington Botanical Society considered the ecological offset proposal to plant 200 swamp maire in Southern Gully is a reasonably positive action, but biodiversity offsetting like this means accepting ecological losses for uncertain ecological recompense or gains. They expressed concern that these trees may take decades to reach maturity and there is no guarantee they will persist that long. They also remain cynical about the ability to relocate the trees.

Hydrology

392. Concerns were raised that the hydrology assessment significantly underestimates the streams in the DOC-Give site, particularly as there are streams that do not dry up and therefore would be more appropriately recognised as perennial.
393. Te Rūnanga o Toa Rangatira considered that the tributaries, wetlands and taonga species within the Belmont catchment require careful consideration.

Cultural

394. Comments from Taranaki Whānui noted the comprehensive engagement on this matter. It considered that the issues had been captured in the cultural values assessment for this application, as well as in the improvements package.
395. Te Rūnanga o Toa Rangatira outlined its engagement with Winstone Aggregates. It noted that its assessment is guided by our kaitiaki responsibilities to Te Ao Tūroa and its obligation to

uphold the mauri of the wider Belmont landscape. Its interest extends beyond the transactional exchange of land parcels to the long term ecological integrity, hydrological function, and intergenerational wellbeing of the catchment.

396. Te Rūnanga o Toa Rangatira noted that proposed land exchange does not alter the enduring relationship of mana whenua with the Belmont landscape. Its kaitiaki responsibilities remain irrespective of land tenure.

Importance of the aggregate

397. Commenters including Firth Industries and Fulton Hogan noted the importance of aggregate supply and the impacts should Belmont cease operation. They noted that concrete is needed to support the significant infrastructure, population growth, construction and housing growth in Wellington. Reliable access to chips and concrete aggregates is fundamental to the continuity of asphalt production; to meet contractual obligations and provide a cost effective supply to Wellington. Housing and infrastructure growth means increased demand for concrete which in turn requires reliable, local aggregate.
398. The Minister for Infrastructure commented that long-term benefits by providing a local source of the aggregate materials that are essential for Wellington's growth, supporting housing, construction, and infrastructure. Projects like this are critical for economic growth.
- Commenters consider the application will secure the long term future of the quarry.
399. The consequence of having to import aggregates from further distances is increased costs, risk, delays and carbon footprint. It would result on an inability to deliver on key infrastructure projects. It is noted that the above comments on the importance of aggregate supply do not relate to the proposed exchange, but to the quarrying activity itself. There are therefore not relevant to the exchange assessment, but are summarised for completeness.

Improvements offered / conditions

400. Luke Wysocki expressed support for trapping and research.
401. The Wellington Conservation Board commented that any legal or financial liabilities resulting from the land exchange, including bonds is important. It expressed concern 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. It supported the opportunities for research on swamp maire, including relating to trans-location of species, restoration efforts and changes in soil ecology over time. It considered ecological mitigation should include the use of volunteers.

Heritage

402. Heritage New Zealand Pouhere Taonga observed that 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. For the substantive application, an earthworks that may modify or destroy an archaeological site(s) will require an archaeological authority application.

Impacts on the nearby activities

403. Fulton Hogan operates the asphalt manufacturing plant adjacent to Belmont Quarry and confirmed that a change in land ownership will not affect its operations.
404. Comments from neighbouring property owner Luke Wysocki raised questions about public access to Dry Creek and in the gully as it would involve the back of his property.

405. New Zealand Transport Agency considers that the land exchange and associated use will not result in any impacts on New Zealand Transport Agency administered land, or prevent or hinder its ability to give effect to its designation. New Zealand Transport Agency noted it has an informal interest in the area of land that is subject to the proposed land exchange with designation conditions which require planting to be undertaken within the Belmont Regional Park to offset the removal of indigenous vegetation along the SH58 alignment. New Zealand Transport Agency advises it has been investigating alternative areas with Greater Wellington Regional Council.
406. Transpower New Zealand Limited confirmed that, based on the information supplied, National Grid assets and operations are not adversely impacted by the proposed land exchange. It noted the Electricity Act grants Transpower the right to access tower structures situated on the land proposed for exchange. Transpower's statutory access rights under the Electricity Act 1992 are not altered by the change in land ownership/management and no additional easements or rights-of-way are required.
407. Some of the comments raise concerns about the effect of the overburden on hydrology or visual effects. This is beyond the scope of the considerations for land exchange and therefore has not been taken into account.
408. The Applicant responded to the comments with a mix of technical addendum reports and memoranda, a planning response and legal memorandum. All feedback from Winstone's is premised on QEII covenanted land being included as having positive value in terms of the exchange, in alignment with its legal opinion. [Appendix 2](#) contains a summary of the Applicant's responses.
409. The comments have been considered by DOC in the context of not only the assessment of the values of both the DOC-Give and DOC-Get sites, but also in the development of recommended conditions.

8.2 Draft report feedback

410. The list of those invited to comment on the draft report and their comments are included in [Appendix 3](#). [Appendix 3](#) contains a summary of the comments received and a response from DOC. It should be noted that the text in this section and the table in [Appendix 3](#) are summaries and readers should refer to the original responses in the link to the EPA website for further detail.
411. Comments were received from:
- a. The Applicant;
 - b. Friends of Belmont Regional Park;
 - c. Heritage New Zealand Pouhere Taonga;
 - d. QEII National Trust;
 - e. Transpower New Zealand Limited;
 - f. Te Rūnanga o Toa Rangatira; and
 - g. Wellington Botanical Society.
412. Similar to the comments received on the Application, there were a mix of comments supporting, opposing and neutral. The Applicant provided comprehensive feedback to the Draft Land Exchange Report that canvassed legal, planning and technical matters. The broad matters raised are set out below.

General comments

413. Both commenters and the Applicant observed the different methodologies used to evaluate the conservation values. Commenters observed that it is not clearly demonstrated that the land exchange will result in an overall enhancement of conservation values. Commenters acknowledged the amendments to the FTAA and the different applications of that. In this respect, Te Rūnanga o Toa Rangatira recognises the need to carefully account for existing protections, such as QEII covenants, to avoid overstating conservation gains. It also recognised the potential for additional and ongoing long term management responsibilities for DOC.

Opposition to the proposed land exchange

414. Friends of Belmont Regional Park and Wellington Botanical Society oppose the Application for a range of reasons including loss of swamp maire and a public recreation area. Both commenters consider that the proposal will result in a net loss and therefore should be declined as the statutory test is not met.

Landscape values

415. Friends of Belmont Regional Park consider that the DOC-Give parcel has a higher level of visibility than the low-moderate value attributed in the landscape assessment. It is visible from about 40% of the most commonly used recreation track in the park.
416. Mr Girvan provided comments on behalf of the Applicant. He noted the high level of consistency between the two assessments of landscape values, with the DOC-Get land having a greater collective value than the DOC-Give land, particularly if the proposed improvement package is secured through robust and measurable conditions. He addressed each of the areas where the two assessments diverged. If the QEII values are discounted, the overall landscape comparison remains as a net benefit in favour of the Crown. He considered that edge effects, weed management, pest control, and the need for greater certainty around restoration outcomes can be addressed through strengthened conditions.

Heritage

417. Heritage New Zealand Pouhere Taonga agrees with Mr Nester that “any transfer would not impact on the conservation of cultural heritage values”. It also drew attention to any future proposal involves works that may modify or destroy an archaeological site(s) will require an archaeological authority.

QEII covenant

418. QEII National Trust drew attention to the requirements of the covenants. It also expressed concern that there is an unstable area between the Firth Block and quarry pit wall, and that any measures to prevent people from accessing the unstable area does not result in any further degradation of native vegetation. Recommends that fencing on the boundary of the Firth Block is required to be constructed as close to the boundary of the Covenant Area as is reasonably practicable and the area stabilised by Winstone before exchange takes place. It also expressed a preference for the QEII covenant to be in a single title.

Cultural

419. Te Rūnanga o Toa Rangatira supports restoring and upholding the mauri of te taiao, but this requires a high level of confidence that any proposed approach will maintain or enhance ecological integrity rather than relying on uncertain future gains. Cultural values must be defined and assessed by mana whenua, not inferred through archaeological methods alone.

The low cultural values assessment is not consistent with the acknowledgement that the sites form part of a wider cultural landscape with established whakapapa connections, historical travel routes, and ongoing relationships of kaitiakitanga.

Key infrastructure providers

420. Transpower confirms that, based on the information supplied, National Grid assets and operations are not adversely impacted by the proposed land exchange. It also drew attention to access to its assets being enabled by the Electricity Act, but that this is not altered by the change in ownership.

Conditions

421. Support for funded long-term weed and pest management beyond the five years offered by the Applicant. Dr Keesing made the following comments:
- Agree with the purpose of Ecological Restoration Plan
 - The list of weed species is too wide
 - Annual weed monitoring is preferred over 6 monthly
 - Baseline mammalian pest monitoring is not warranted
 - Reduction target monitoring of pest animals is not required

Botanical values

422. Dr Keesing and Dr Ussher provided comments on behalf of the Applicant. The DOC-Get sites do not have the same values as the DOC-Get site with its swamp maire and ecological composition. Dr Keesing provided a response on behalf of the Applicant and noted the difference in methodology between the DOC assessment which was focused on botany while the BlueGreen assessment was broader ecology. Dr Keesing considered that Mr Ward has materially overstated the conservation values of the DOC-Give site in a number of the assessment criteria, and under-valued the DOC-Get sites. He considered that how values were derived at are not clear. He remains of the view that, taking into account the proposed improvements, principal of which is the addition of a large number of swamp maire and Ramarama, the land exchange proposal will achieve a net conservation benefit for ecological values. Conservation values are further enhanced and provide even more benefit to the Crown if an additional 200 swamp maire and Ramarama in the Regional Park area proposed in Package B is provided.

Swamp maire

423. Swamp maire attracted a number of comments. Dr Keesing disagrees with the 200:1 offset for the planting of swamp maire proposed by Mr Ward and that 200 is a more fair and proportionate level than 1800. He noted that the Southern Gully could support up to 600 if the Panel wanted to increase the number. Conversely some of the commenters supported the 1,800 swamp maire offset ratio. Dr Ussher considered that 200 is appropriate.

Terrestrial fauna values

424. Dr Burrige provided comments on behalf of the Applicant about bats with more detail on the bat surveys. She considers the exclusion of the QEII sites would have no effect on values relating to bats or bat habitat.
425. Mr Payne provided further information on lizards with additional detail on detection methods used. He notes that the land exchange does not rely on pest control delivering lizard population benefits at the DOC-Get sites, and instead rests on the substantial net-gain in lizard habitat extent and quality that DOC receives as a consequence of the exchange. The

DOC-Get sites provide an increase of 14.36 ha of lizard habitat overall and 3.46 ha of high-quality habitat. The effect of discounting the conservation effects of QEII covenanted area is a reduction of lizard habitat but the total area of lizard habitat at the DOC-Get sites is still greater by 2.2 ha, with a relatively comparable exchange in lizard values is achieved slightly in DOC's favour.

Archaeology

426. Ms Cameron provided comments on behalf of the Applicant. She agreed with many of Mr Nester's assessments. She discussed the value of Site R27/910 and that it could be medium if any subsurface remains are established dependent on their condition and extent. There is potential for archaeological remains of the tramway to also be present in both the Northern and Southern Gully sites. This would result in a low-medium ranking for archaeological value for Southern Gully. Suggested deletion of the column for "cultural values" and replaced that this value is to be determined by mana whenua. The discounting of conservation values associated with the QEII covenants will have no effect on archaeological values.

Freshwater values

427. Dr Keesing disagrees with the DOC assessment that the difference between the DOC-Get and DOC-Give values are neutral. He considers that the DOC assessment overinflated the DOC-Give areas in the exchange waterways and underrated the Northern Gully waterways but arrived at the same overall value (without consideration of the quantity of stream and habitat given and offered). He outlined the areas of disagreement between the DOC and BlueGreen and hydrology assessment. He considers that Mr Williams' freshwater values do not appear to have taken into consideration the much greater length of stream that is offered through the DOC-get parcels. While DOC conclude that the exchange is balanced, Dr Keesing is of the strong opinion that the exchange favours DOC, with DOC receiving more and better aquatic habitat than it releases.

Hydrology

428. Dr McConchie provided comment on behalf of the Applicant. If the conservation values of the two QEII Blocks must be discounted by the Panel, it will result in a reduction of stream length of 436 m from the Firth Block and 185 m from Northern Gully. Seto out the gains the proposed land exchange will provide to DOC including longer stream length, increase in the upstream catchments contributing flow and 'protected' hydraulic connections to several upstream catchments, providing a net benefit in favour of the Crown in terms of hydrology.

Recreation

429. Mr Greenaway on behalf of the Applicant addressed Mr Harbrow's assessment. He does not consider that unformed exploration tracks should be afforded the same weight as properly planned, sanctioned and maintained tracks when assessing the long-term recreation outcomes of the exchange and the "low" recreation value is warranted for the DOC-Give. He considers that the addition of public access from Liverton Road increases the DOC-Get recreation value from low to low-medium. Very minor impact on the assessment of recreation values if the QEII conservation values were discounted.

Land contamination

430. Pattle Delamore Partners provided comments on behalf of the Applicant. It described the pocket of dumped waste material in Northern Gully and the potential for localised contamination may be present within and hydrologically down gradient. A targeted investigation of this area is considered appropriate for contamination as a precondition. The

Preliminary Site Investigation for Northern Gully, Southern Gully and Firth block indicated no evidence of bulk storage of drums for fuel, chemicals or liquid waste. Stated that the potential for contamination from quarrying is very low due to the nature of rock quarrying operations, including the overburden. The results of near-surface soil testing in Dry Creek did not identify contaminants that would present a risk to staff / personal involved in planting or soil disturbance. Set out conditions around contaminated land.

Works in Belmont Regional Park as proposed by Conditions Package B

431. Greater Wellington Regional Council support in principle the use of two sites within Belmont Regional Park for biodiversity restoration and enhancement for offsetting/mitigation purposes. Separate agreements will be required to address operational matters.

Legal and planning issues

432. A number of legal and planning comments were raised by the Applicant including:
- The version of the FTAA that applies;
 - The development of Conditions Package B in the event that the Panel applies the amended version;
 - The statutory test and whether each category of conservation values needs to have a net gain;
 - Methodological differences;
 - Suggestions that the DOC-Get sites will be included in Belmont Regional Park;
 - Removal of the Hutt City Council vegetation encumbrance from the title to the Firth Block;
 - The assignment of too many conditions under cl 31;
 - The absence of s 78 conditions;
 - Further amendments to the conditions by Winstone including the bond, management plans, number of swamp maire, targeted weed species and monitoring of pests;
 - Clarification of the relevance of the paper road;
 - Statutory tests for a land exchange;
 - Assessment against the purpose of the FTAA; and
 - Need for explicit recognition of cultural conservation values;

9 Alternative assessment

433. DOC applied the former version of the FTAA. In its comments to the draft land exchange report the Applicant has contemplated that the Panel may apply the current version of the Act. The Applicant agrees with the approach of the Department in that the application and this report is under the old law but disagrees about the Panel decision being under the new law. However, and notwithstanding that legal view, the Applicant has in its comments to the draft land exchange report contemplated that the Panel may apply the current version of the Act. Of particular consequence is the addition of cl 29(2A), which provides: *“When considering the conservation values of the land to be acquired by the Crown, for the purpose of forming its view under subclause (2), the Panel must discount the extent to which the conservation values of that land are affected by anything registered or noted for conservation purposes on the record of title for that land.”*
434. Because the Applicant has raised this proposition, this section of the report sets out the conservation values if the QEII covenanted areas are excluded. It also addresses Conditions Package B proposed by the Applicant.

9.1 Conservation values

435. As well as assessing the conservation values of the entire areas proposed for exchange, each of DOC's experts has also assessed the conservation values without the QEII covenanted areas. This is collated in Table 12. The approach taken in this report is outlined in the attached further Legal memorandum dated 7 July 2026 ([Appendix 6](#)). In short, as there is a QEII covenant protecting the conservation values of part of the land (the QEII blocks – the nature of which is set out earlier in this report and in the annexed legal memorandum #2) the values of the QEII blocks are already protected. So, in deciding whether the values of the conservation land will be enhanced (i.e., whether there would be a “net benefit” from the exchange), the values of the QEII land are effectively disregarded.

Value	DOC-Give	DOC-Get	Net gain?
Flora	Moderate-High	Moderate	No (Loss)
Terrestrial fauna	Moderate	Moderate	No (No change)
Landscape and natural character	Moderate	Moderate	No (No change)
Recreation	Low-Medium	Low	No (Loss)
Heritage	Low	Low	No (No change)
Freshwater ecology	Medium-High	Medium-High	No (No change)
Cultural	Expected to remain consistent	Strengthened providing an overall uplift in conservation outcomes	Yes based on Cultural Values Assessment Report

Table 12 DOC expert advisers' assessment of values **excluding conservation values** affected by the presence and content of the QEII covenants, and taking into consideration Conditions Package A

436. In terms of overall conservation values, the main consequence of applying the amended version of the FTAA is that there is no net gain of conservation values in any of subject areas other than cultural.¹¹⁸ There remains a net loss in recreational values.
437. For comparison, Table 7 (on page 40) represents the pre-amendment version of the FTAA (including conservation values of the QEII covenanted areas).
438. DOC's assessment in Table 12 contrasts with the Applicant's assessment as shown in Table 13.

¹¹⁸ This is based on the replacement Table 28 including QEII considerations as contained in the planning response to the Draft Land Exchange Report, J. Wikaira dated June 2026.

Discipline	DOC-Give	DOC-Get	Net gain?
Ecology (habitat)	Moderate	Moderate – Very high	Yes
Ecology (birds)	Moderate	High	Yes
Ecology (bats)	Nil	Nil	No (No change)
Ecology (freshwater)	Low	Medium - High	Yes
Hydrology	1,855 m of stream length	2,408 m of stream length	Yes
Ecology (lizards)	18.83 ha of habitat	20.98 ha of habitat	Yes
Landscape	Moderate	Moderate – High	Yes
Recreation	Low	Low – Medium	Yes
Archaeology	Very low	Very low	No (No change)
Cultural	Expected to remain consistent	Strengthened providing an overall uplift in conservation outcomes	Yes based on Cultural Values Assessment

Table 13: Applicant's assessment excluding conservation values affected by the presence and content of the QEII covenants and after applying Conditions Package B¹¹⁹

439. The Applicant notes that some of the key changes arising from excluding the conservation values of the QEII covenanted area include:
- For freshwater ecology, the conservation values would be unchanged but the length of aquatic habitat would be reduced by 110 m for the Firth Block and circa 250 m from the Northern Gully.¹²⁰
 - Dr McConchie had different metrics and stated that 436m of stream length in the Firth Block and 185m of stream length in the part of the Northern Gully that is subject to the QEII covenant would need to be excluded.¹²¹
 - The exclusion of two areas of mature forest and the rarity elements of the forest ecosystem in the North Gully and some of the ramarama.
 - The two areas of QEII covenant land have a notable influence of the quantum of lizard values being exchanged by excluding the conservation values assigned to the QEII covenants. The total area of lizard habitat at the DOC-Get sites is still greater by 2.2 ha, and the differences between high, medium and low value habitat effectively balance each other out such that a relatively comparable exchange in lizard values is achieved, slightly in DOC's favour.¹²²

¹¹⁹Response to draft DOC report – planning, J. Wikaira dated 125 June 2026 at [133]

¹²⁰ Response to the DOC Freshwater Assessment, Dr V. Keesing dated 15 June 2026 at [130]

¹²¹ Impact of QEII covenant areas memorandum, Dr J McConchie dated 12 June 2026, page 1

¹²² Response to DOC report – lizards, T. Payne dated 12 June 2026 at [27]

440. For completeness, a comparison of the assessments of values as undertaken by DOC's experts (green) and Winstone's experts (black) disregarding the values of the QEII blocks is set out in Table 14.

Discipline	DOC-Give	DOC-Get	Net gain?
Ecology (habitat)	Moderate	Moderate – Very high	Yes
	Moderate-High	Moderate	No (Loss)
Ecology (birds)	Moderate	High	Yes
Ecology (bats)	Nil	Nil	No (No change)
Ecology (lizards)	18.83 ha of habitat	20.98 ha of habitat	Yes
Terrestrial ecology	Moderate	Moderate	No (No change)
Ecology (freshwater)	Low	Medium - High	Yes
	Medium-High	Medium-High	No (No change)
Hydrology	1,855 m of stream length	2,408 m of stream length	Yes
Landscape	Moderate	Moderate – High	Yes
Landscape and natural character	Moderate	Moderate	No (No change)
Recreation	Low	Low – Medium	Yes
	Low-Medium	Low	No (Loss)
Archaeology	Very low	Very low	No (No change)
Heritage	Low	Low	No (No change)
Cultural	Expected to remain consistent	Strengthened providing an overall uplift in conservation outcomes	Yes based on Cultural Values Assessment

Table 14: Comparison of the conservation values excluding conservation values affected by the presence and content of the QEII covenants and after applying Conditions Package B. Green shading indicates the conservation values attributed by DOC.

9.2 Conditions Package B

441. The Applicant has prepared Conditions Package B in the event that the Expert Consenting Panel apply the amended cl 29(2) and (2A) to the land exchange application with the

conservation values of the QEII areas discounted in the panel's assessment. This means that there will be discounting of the protected conservation values of part of the Northern Gully area and all of the Firth Block area (but only to the extent of those values are protected by the QEII covenant).

442. The legal submissions for the Applicant consider that the amended version of cl 29(2A) allows the Panel to take into account improvements or benefits to the conservation estate "considered as a whole" including those that sit outside the exchange parcels.
443. As set out in the Applicant's legal submissions, the extent of improvements offered is greater under Conditions Package B than Conditions Package A to account for the discounting of the QEII areas' values and includes improvements within the wider Belmont Regional Park (in the event the panel considers they are required).¹²³
444. Package B as proposed by Winstone includes the following elements:
- a. All of Conditions Package A;
 - b. Planting of 200 further swamp maire and 200 ramarama at an offsite location in the Belmont Regional Park adjacent to the DOC-Give area; and
 - c. Five year weed pest control and ten year mammalian pest control in the Belmont Regional Park at the offsite planting location to assist the successful establishment of the planting.
445. Given that Condition Package B would require restoration works within the Belmont Regional Park, the comments from Greater Wellington are particularly relevant¹²⁴. The comments support in principle the use of land within Belmont Regional Park, consisting of two potential sites for biodiversity restoration and enhancement (the proposed works), which may be required for offsetting/mitigation purposes involved in regulatory requirements of the project. The sites are described as:
- a. land that is part of the Conservation Estate (owned by the Crown but which is managed and controlled by Greater Wellington as Belmont Regional Park) in the immediate vicinity of the Proposed OBDA land; and
 - b. a block of land known as the Heffernan Block that is within the Regional Park and owned by Hutt City.
446. The Council notes that the proposed works are:
- a. not currently subject to programmed works by Greater Wellington that would conflict with the proposed offset or mitigation activities.
 - b. generally consistent with the long-term management intent for the land, including ecological management and site restoration
447. The Council advises that the land is held as Belmont Regional Park land and managed by Greater Wellington Regional Council and is subject to applicable statutory and management plan requirements being a recreation reserve. Although the letter confirms support from an asset management perspective only, the need for statutory approval is noted. The letter also observes that should statutory approval be granted for the Belmont Quarry Development Project, a separate agreement with Greater Wellington Regional Council will be required to address operational matters including access, health and safety, methodology of works, maintenance and monitoring, management and cost recovery / funding.

¹²³ Response to draft report on land exchange, dated 15 June 2026 at 75

¹²⁴ Letter of support for Winstone Aggregates (Winstone's) Belmont Quarry Development Offset/Mitigation Proposal, D. Boone dated 15 June 2026.

448. DOC considers the question around the scope of these conditions will need to be carefully considered by the Panel, as:
- a. It was not what the exchange application originally sought. If the Panel is minded to consider Condition Package B, given it was not originally part of the application, the Panel might consider it appropriate to seek further information from the Applicant on this under ss 67/68 of the FTAA;
 - b. The proffered conditions relating to Package B do not relate to the land being exchanged. It is clear that the test in cl 29(2) is about the land being exchanged and any conditions.
 - c. Clauses 31 and 32 do not provide scope for conditions relating to offsite works (or the payment of money for offsite works).
449. This matter is addressed separately in Legal memorandum #2 dated 7 July 2026 ([Appendix 6](#)). On the basis of this assessment, DOC considers that Conditions Package B is ultra vires the Act, and therefore cannot be imposed.

10 Summary of conclusions

450. As outlined in the Introduction, this report has traversed all of the relevant statutory criteria in s 35 and the associated provisions. It is prepared and assessed against the provisions in the FTAA that were in force when the Application was made. A decision by the Panel will be required on whether the new provisions apply at the time it makes its decision. The legal memorandum in Appendix 5 sets out the Department's view that these new provisions do apply to the Panel.
451. This report provides the necessary platform for a decision by the Panel on whether to approve the exchange under the key provisions in the FTAA (s 81 and Schedule 6) as they were when the Application for land exchange was lodged.
452. By way of overall summary on the values, based on the current values of the sites and taking into consideration the improvements offered in Conditions Package A, the technical advice to DOC is that there would be:
- a. a net benefit for landscape and natural character, cultural and terrestrial fauna;
 - b. no difference (and therefore no net gain) for cultural heritage values and freshwater ecology values; and
 - c. a net loss (and therefore no net gain) for flora and recreation.
453. This contrasts with the Applicant's assessment which indicates:
- a. a net gain for ecology (habitat, birds, freshwater and lizards), landscape, recreation, cultural and hydrology; and
 - b. no difference (and therefore no net gain) for ecology (bats) and archaeology.
454. Should the Panel be minded to approve the land exchange, DOC recommends amendments to Conditions Package A as preconditions (cl 31) and conditions (cl 32), and DOC requires that the specified section 78 conditions be imposed (cl 33).
455. The recommended amendments to the conditions would ensure they are SMART and also provide certainty that the improvements will be carried out to an appropriate standard.

Appendix 1 – Application for land exchange and comments received on the application

This information can be found on the EPA website:

<https://www.fasttrack.govt.nz/projects/belmont-quarry-development/land-exchange-application>

Appendix 2 – Summary of comments received on the application and responses

The comments received can be found on the EPA website:

<https://www.fasttrack.govt.nz/projects/belmont-quarry-development/land-exchange-application>

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
Friends of Belmont Regional Park Incorporated		
- No net increase in conservation values due to inclusion of the QEII covenanted areas - The scoring system in the Ecological Assessment (Appendix B1) is skewed and confused on important points, and relies in large part on the values of two parcels of land whose conservation values are already legally protected in perpetuity, due to their QEII covenant status. These two areas cannot be considered to add conservation value or offer any recreation value.	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 Applicant's comparison of values indicates that the conservation values of the DOC-Get land are greater than the DOC-Give land. The QEII covenants do not reduce the significance of their contribution to the DOC estate upon exchange.¹²⁵ 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.¹²⁶	The technical assessments undertaken by DOC have both included and excluded the QEII covenanted land due to the changes to the FTAA legislation. With the improvements offered by the Applicant there will be a net increase in conservation values for landscape and natural character. There is an increase in the conservation values of landscape, terrestrial fauna and botanical and vegetation elements for particular DOC-Get sites.

¹²⁵ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.59-3.61]

¹²⁶ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.64]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	While a good proportion of the valued mature forest is in the QEII area (especially the better tawa-kāmahi area) but the valued wetland area, the hinau-kāmahi 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.¹²⁷ The test that must be met is that set out in cl 29(2), requiring that the exchange will enhance the conservation values of land managed by DOC. This is not the same thing as a “net-conservation benefit” or a “net benefit for conservation.”¹²⁸	
Including the QEII areas gives a total DOC-Get value of 33.19, compared with 18.83 in DOC-Give. If the QEII areas, being already conserved, are excluded from the calculation, the DOC-Get value drops to 19.27. Concludes there would be little change to the lizard habitat values.	The extent of lizard habitat in the QEII covenant areas are to be considered in the application.¹²⁹ With regards to the relevance of the QEII covenanted areas, Clause 29(2) was amended in December 2025 by the Fast-track Approvals Amendment Act 2025, with the amendment to cl 29(2) coming into force on 17 December 2025. The land exchange application was lodged before the amendments came into force.¹³⁰	The assessment undertaken by Dr Burns indicates that including the QEII covenanted areas does result in a slightly higher ecological value for lizards than if the QEII covenanted areas are excluded. With the inclusion of conditions requiring restoration planting, there will be an increase in the diversity of lizard habitat and result in higher quality habitat. The management of pests

¹²⁷ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 10

¹²⁸ Legal memorandum dated 5 March 2026 at [75]

¹²⁹ Memorandum in response to The Friends of Belmont Regional Park, Blueprint Ecology, dated 3 March 2026.

¹³⁰ Legal memorandum dated 5 March 2026 at [17-30]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
		through the conditions is likely have a significant effect on lizard populations.
Significant loss in ecological habitat value given the importance of established 50 to 85 year old and valuable tree species, and their associated wetlands within the DOC-Give site	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 Wikaira (2025). That Assessment concludes that the project will 'provide a net conservation benefit'. 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.¹³¹ Five trees in the DOC-Give 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.¹³²	This has been addressed in the botanical technical report, the submitter is correct, the loss of the six headwater wetlands is significant and they do contain 9 (not 5 as suggested here by Winstone) Threatened – Nationally Vulnerable Swamp maire (<i>Syzygium maire</i>) specimens which are relict of a rare forest type to the Wellington region. Quantity of specimens is not important; existence of the species is important. The conditions initially proposed by DOC in the Draft Land Exchange Report recommend a 1:200 replacement ratio and require 1,800 swamp maire of minimum PB3 size and vegetative height of 600mm to be propagated and planted in the Southern Gully. This has since been revised to a minimum of 200 specimens, reflective of this being a land exchange application rather than a resource consent application and to avoid creating a monoculture.

¹³¹ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.93-3.94]

¹³² Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 9

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	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-kāmahi forest, hinau-kāmahi forest, and the tawa forest of the firth block. 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. The Applicant considers that the exchange is balanced in favour of DOC in terms of ecology.¹³³	
The DOC-Give site contains swamp maire, ramarama and other endangered species which will be destroyed	The Applicant's response is that that the land exchange proposal would not involve destruction of any species. 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.¹³⁴	The land exchange process will not result in destruction of these endangered species. That is an issue to be addressed in the substantive application. However additional planting of swamp maire and ramarama is required in DOC's recommended conditions. There are detailed conditions requiring the propagation and planting of swamp maire. The recommended

¹³³ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 10

¹³⁴ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.53]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	The presence of swamp maire is well documented with a specific section in BlueGreen Ecology. The Applicant considers this thoroughly and transparently documents the presence and distribution of that population.¹³⁵ 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. There is ramarama in the DOC-Give, but 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 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.¹³⁶ The natural inland wetland area present on the DOC-Give is not irreplaceable; it is a relatively simple carex-kiokio wetland with some	conditions include a minimum of 500 ramarama to be planted in Dry Creek.

¹³⁵ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.66]

¹³⁶ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 11

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	regionally underrepresented sedge and rush taxa that is in a modified state post farm use. Wetland recreation is typically successful throughout the country, but consider that the loss of the wetland area is a substantive application offset issue, and is not an effect of the land exchange. ¹³⁷	
If the application were to proceed, 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	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.¹³⁸	Agreed that this suggestion would protect the Regionally Uncommon sedge <i>Carex maorica</i>, and the other obligate wetland species present as listed in Ward 2026 page 6. The assessment of the conservation values of the land exchange application is based on the proposal submitted by the Applicant.
The DOC-Get sites are not suitable for recreation due to topography and difficult access	During consultation, staff from Greater Wellington Regional Council presented a view that there was no appetite for the creation of new tracks.¹³⁹ The Recreation Assessment (Rob Greenaway & Associates) concludes that there is no net loss	Agree, the DOC-Get land is fragmented, lacks existing tracks and is generally not well connected to conservation land within Belmont Regional Park. This contrasts with the relative ease of access to the DOC-Give land. (see Recreation Technical Report point 28). The steepness of the land is also noted at several points in the Recreation Technical Report.

¹³⁷ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 16

¹³⁸ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.98]

¹³⁹ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.71]; Memorandum on recreation, Rob Greenaway dated 5 March 2026 at [4]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	in recreation values as a consequence of the exchange. Considers there is no existing demand for recreational track development in the exchange areas, which informed the assessment of low recreation value in both the DOC-Get and DOC-Give areas. As identified in the Network Plan, there may be demand for a new short walk in the Dry Creek area, subsequent to the completion of the park master planning proposed by the Network Plan.¹⁴⁰ Not all areas of recreation reserve need to be immediately available or suitable for recreational use and access. There are significant areas of Belmont Regional Park and other land within the conservation estate that are not currently used for recreational purposes, including parts that are grazed by livestock or difficult to access — but that does not mean those areas are misclassified. The purposes of a recreation reserve are a balance between public use and environmental protection.¹⁴¹	This is reflected in the Low classification Mr Harbrow has attributed to the recreation values for the DOC-Get land. The Applicant has proposed enabling public access to the Southern Gully from Liverton Road and this is reflected in the conditions.
The Applicant's assessment of recreation values does not recognise the trails throughout the DOC-Give site, many of	Off-track opportunities are common in most areas within the Regional Park and there are no indications that the study area is particularly	Agree. The presence of predator control lines and informal trails which appear well used and provide relatively easy travel is noted in the

¹⁴⁰ Memorandum on recreation, Rob Greenaway dated 5 March 2026 at [8-9]

¹⁴¹ Legal memorandum dated 5 March 2026 at [59]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
which are pest control lines that provide access throughout the site. The recreation value of the DOC-Give site could easily be increased through interpretative signs and Panels.	unusual. The track counter data is very likely to have counted all those accessing this area of the park via Buchanan's Road, including those not using Strava. The site visit did not reveal any "well marked connecting paths" and remain of the view that it is not developed for general recreation. These were also not identified in the Xyst review. Well marked paths should be patently obvious.¹⁴² Improvements offered in the exchange process must focus on the parcels of land being exchanged. The existing environment reflects no expectations for new recreation developments in the parcels under consideration.¹⁴³	Recreation Technical report (point 24). Mr Harbrow notes the estimate of use of the Buchanan Road Tramping Track in the applicant's Recreation Assessment is flawed. Mr Greenaway has addressed this matter in his repose to the Draft Land Exchange Report. Future development of recreation opportunities in this area, such as installation of interpretive signs and Panels, is considered in the Recreation Technical Report but is not a priority for either DOC or Greater Wellington Regional Council. In the absence of funding or management agreements for development by a third party, this is speculative.
The greater perimeter will increase the incursion of pests and weeds	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. BlueGreen Ecology (2025, pg. 90) identifies weed control and pest management, in	The length of the perimeter would increase and with it comes increased risk of weeds and pests. This is reflected in the assessments undertaken by DOC's experts. The conditions suggested by DOC require 90% weed control and comprehensive pest management.

¹⁴² Memorandum on recreation, Rob Greenaway dated 5 March 2026 at [14-16]

¹⁴³ Memorandum on recreation, Rob Greenaway dated 5 March 2026 at [10-11]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	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.¹⁴⁴ The Applicant does 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 and can be managed accordingly.¹⁴⁵	
The dispersed location of the DOC-Get sites will fragment the Belmont Regional Park	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.¹⁴⁶	The DOC-Get sites are all contiguous with the Belmont Regional Park, however it would change the overall shape of the Regional Park around the quarry. It cannot be assumed that the DOC-Give sites would become part of the Belmont Regional Park.
Little to no ecological value of Dry Creek	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	This matter is addressed in Ward 2026 page 10. Mr Ward assessed Dry Creek as having Low ecological value, consistent with the assessment of the Applicant.

¹⁴⁴ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.79-3.80]

¹⁴⁵ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 9

¹⁴⁶ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, pages 9 and 10

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	dissimilar for fauna as the DOC-Give, 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. ¹⁴⁷	
The use of the DOC-Give site for overburden will remove the streams and affect the drainage characteristics	The effects of the development of the overburden area are to be considered as part of the substantive application. ¹⁴⁸ 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. ¹⁴⁹	The future use of the DOC-Give area could not be considered as part of the freshwater ecology assessment. This is a matter to address in the substantive application.
The Hydrology assessment grossly misrepresents the actual hydrology of the DOC-Give site and therefore underestimates the likely impact.	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. The hydrological modelling therefore provides an accurate quantification of the	This matter was considered when undertaking the freshwater ecology assessment.

¹⁴⁷ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 15

¹⁴⁸ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 16

¹⁴⁹ Addendum to the Hydrological analysis, pages 1 and 3

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	number, length and size of the various watercourses and drainage lines throughout all areas.¹⁵⁰ The land exchange would result in a net increase in the length of streams and associated aquatic ecosystem protected within Belmont Regional Park.¹⁵¹	
The need for any legal or financial liabilities resulting from the land exchange, including bonds.	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).¹⁵² There is no ability for the Panel to impose a bond as a condition of the land exchange application. The scope of conditions that may be imposed on a land exchange is set by sch 6, cls 31 and 32.¹⁵³	DOC is cognisant of the legal and financial liabilities and has addressed this through the conditions such as: - Bonds; - Remediation of any contaminated land; - Fencing in the Firth block near the quarry pit face; and - Works to stabilise the edge of the Firth block
The comments recommend that if the land exchange were to be approved: it only be initiated if the substantive application is also approved; and	Winstone Aggregates has filed a submission on the Proposed Lower Hutt District Plan, but as submissions have closed there is no further opportunity through that process. Its submission points include a request for certain areas to be rezoned as Natural Open Space Zone with a	The land exchange process is separate to the substantive application and it cannot be assumed that the substantive application will be approved or declined at this stage.

¹⁵⁰ Addendum to the Hydrological analysis, page 2 and 4

¹⁵¹ Addendum to the Hydrological analysis, page 3

¹⁵² Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.84]

¹⁵³ Legal memorandum dated 5 March 2026 at [45]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
a plan change to the Hutt City District Plan to change the zoning to Natural Open Space Zone.	Quarry Zone Protection Overlay, where those areas are anticipated to be owned by DOC as a consequence of the proposed land exchange.¹⁵⁴ Such a condition would not be appropriate and is likely to be <i>ultra vires</i>.	It is not appropriate for the conditions to require a plan change to change the zoning.
Identification of new archaeological site (R27/910)	The new site is recorded as a ruinous 20th century farm outbuilding and does not alter the archaeological values of the proposed land exchange properties as presented in the archaeological assessment report for the land exchange. ¹⁵⁵	This site is recognised in Mr Nester's assessment of heritage values.
Firth Industries		
- Supports the application and its plan to secure the long term future of the quarry - Housing and infrastructure growth means increased demand for concrete which in turn requires reliable, local aggregate	No response required	No response required. The importance of good quality aggregate is recognised for supporting development.
Fulton Hogan		
- Supports the land exchange proposal - Confirmed that the change in land ownership will not affect operation of the asphalt plant - Outlines the importance of the quarry to maintaining asphalt production. If the quarry	No response required	No response required. The importance of good quality aggregate is recognised for supporting development, as well as its proximity to a significant urban area. Accept that a change in

¹⁵⁴ Legal memorandum dated 5 March 2026 at [61-63]

¹⁵⁵ Archaeology memorandum, Ellen Cameron date 4 March 2026, page 2.

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
were to close or significantly reduce its outputs, this would have flow on effects for key infrastructure and increased emissions to transport the product from further afield. This will have consequences for the wider community through higher project costs and delays on the delivery of essential infrastructure.		ownership will not affect operation of the asphalt plant.
Greater Wellington Regional Council		
Summary of land on each site held by Greater Wellington Regional Council including • Land area of each parcel • Area of DOC-Give • The DOC-Give falls within the Belmont Dry Creek Key Native Ecosystem which is managed as part of the Greater Wellington Key Native Ecosystem Programme. This programme provides long term funding for weed control and pest animal control. • Identification of the QEII covenanted areas • Terrestrial and freshwater information held by Greater Wellington including previous landuses, waterways, physical environment and management activities • Vegetation maps surveyed by Boffa Miskell in 2017 • An email from Friends of the Belmont Regional Park outlining its concerns with the proposed land exchange. This includes the presence of	No response required	No response required. The report contained useful information on the sites held by Council.

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
swamp maire, ramarama, <i>Coprosma rubra</i> and the rich diversity of plants present in the DOC-Give site. The email considered that the proposed land exchange does not offer any ecological gain but instead ecological loss. An email from the Wellington Botanical Society outlining its concerns with the proposed land exchange. This includes the presence of swamp maire, <i>Coprosma rubra</i>, <i>Lophomyrtus bullata</i> and a large proportion of Category 1 threatened environment.		
Heritage New Zealand Pouhere Taonga		
Outlines its understanding that 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. Acknowledges that earthworks as part of the substantive application will involve earthworks that may modify or destroy an archaeological site(s) and an archaeological authority application will be required at that point.	No response required ¹⁵⁶	No response required. The modification of destruction of the registered archaeological site is not proposed as part of the land exchange proposal.
Hutt City Council		
Council expressed a neutral position	No response required	No response required and the position is noted.
Luke Wysocki		

¹⁵⁶ Planning memorandum, Jade Wikaia dated 5 March 2026 at [3.15]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
- Neighbouring property owner - Supportive of ongoing trapping and researching in the Southern Gully site - Concerns about the forming of any new tracks providing public access from the dry creek to their property	Comments were directed to the Department of Conservation as future owner about future land use of the Southern Gully. Applicant considers there were no issues raised in relation to the land exchange application. ¹⁵⁷	The concerns are noted, although no action is required at this stage of the land exchange application. The proposed management of pests will support the habitat of the DOC-Give sites.
Minister for Infrastructure		
No comments on the land exchange proposal, but acknowledges the project will deliver long-term benefits by providing a local source of the aggregate materials that are essential for Wellington's growth, supporting housing, construction, and infrastructure.	No response required ¹⁵⁸	No response required. The importance of good quality aggregate is recognised for supporting development, as well as its proximity to a significant urban area.
New Zealand Conservation Authority		
Opposes the exchange of land for the following reasons: Does not consider the exchange will result in a net benefit for conservation	The test that must be met is that set out in cl 29(2), requiring that the exchange will enhance the conservation values of land managed by DOC. This is not the same thing as a "net-conservation benefit" or a "net benefit for conservation". ¹⁵⁹	Based on the conservation values of the sites (without taking into account proposed improvements through conditions), there would be: - no net gain for biodiversity - flora and recreation; - no difference (and therefore no net gain) for cultural heritage values and freshwater ecology values; and - a net benefit for landscape and natural character and terrestrial fauna.

¹⁵⁷ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.9]

¹⁵⁸ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.12]

¹⁵⁹ Legal memorandum dated 5 March 2026 at [75]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
		This assessment changes slightly upon consideration of the improvements offered by the Applicant, with an increase in the conservation values of landscape, terrestrial fauna and botanical and vegetation elements for particular DOC-Get sites. The improvements offered by the Applicant do not result in an overall change in net gain however.
A lack of visibility in relation to iwi consultation	Detailed the 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. 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. 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. Explained that information has been redacted at the request of mana whenua.¹⁶⁰	The Applicant provided detail with the Application of consultation with iwi. The conditions proposed by DOC ensure Taranaki Whānui ki te Upoko o Te Ika is meaningfully involved in the development of the Ecological Restoration Plan. The conditions formalise the feedback from mana whenua and incorporation of those matters in the Plan. The Applicant amended the conditions to also include Te Rūnunga o Toa Rangatira in the development of the Ecological Restoration Plan

¹⁶⁰ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.23-3.25]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
Increase in perimeter length meaning greater management of incursions of weeds and pest species/predators from neighbouring private owners will be needed, and this comes with financial implications	The length of the property boundary from 16.31 km to 19.88 km, which is approximately a 22% increase. The property boundaries are not the edge of the ecological habitats as they are connected to a contiguous habitat to the north and east.¹⁶¹ Restoration efforts, including but not limited to pest plant and animal control, are proposed.¹⁶² This will address edge effects from neighbouring rural lifestyle properties as part of the proposed management plan. The Applicant does 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 (this is assumed) and can be managed accordingly. The 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.¹⁶³	The landscape report raises the 'edge effect' issue regarding neighbouring private landowners at [34]: "The southern 'panhandle' of the Northern Gully and the Southern Gully 'Get' land parcels form a relatively narrow 100 m – 150 m wide 'peninsula' largely comprising 'edge' as opposed to 'patch' extending into a developing rural-residential area. This developed area may be the source of an ongoing spread of animal and plant pests." Mr Ward suggests the present exposed edge to the active quarry edge is 380 m, with the suggested land exchange considered this increases to 5,000 m an increase 1,300%. The length of the perimeter would increase and with it comes increased risk of weeds and pests. The conditions suggested by DOC require 90% weed control and comprehensive pest management by the Applicant for five years. This has since been revised to ten years in the final Land Exchange Report.
The reduction in public access and likelihood of recreational opportunities.	The absence of public access and tracks in the DOC-Get sites was based on the indications	The level of accessibility of each block is covered in the Recreation Technical

¹⁶¹ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.27-3.29]

¹⁶² Land Exchange Report, Wikara Consulting dated 7 December 2025, pages 79-80

¹⁶³ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 2

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
Fragmentation will affect the recreational values of the area given the proximity of the DOC-Give site to Buchanan's Walking Track. The DOC-Get land is challenging terrain to access	from Greater Wellington Regional Council that it had no desire for new tracks to be constructed on land it managed to allow for connectivity. ¹⁶⁴ The Application considered the effects on recreation. ¹⁶⁵ This assessment concludes that the loss of the utility track section of the Buchanan Road Tramping Track is immaterial.	Assessment (points 27 – 35) and is one of the key reasons the DOC-Get land is assessed as having low recreation value. This contrasts with the ease of access to the DOC-Give land from the Buchanan Road Tramping Track. The Applicant added public access to Southern Gully from Liverton Road in response to the Draft Land Exchange Report.
Set out the legislative context for the creation of the Belmont Regional Park and the framework for any land exchanges	No response required.	No response required. The legal framework has informed the structure and content of the Land Exchange report.
The DOC-Get land is in separate parcels raising questions about the ability of these parcels to serve as corridors for species	The Applicant states 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 overburden area is in operation.¹⁶⁶ 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.¹⁶⁷	The parcels are all contiguous with the Belmont Regional Park which means there is the potential for corridor function.

¹⁶⁴ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.30]

¹⁶⁵ Recreation Assessment, Rob Greenaway & Associated, 2025.

¹⁶⁶ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 1

¹⁶⁷ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 15

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
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	Not explicitly addressed.	The loss of the Threatened - Nationally Vulnerable swamp maire, will have an effect on the species' slow but steady spread in the area. It is unique to this area, not found anywhere else within the Belmont Regional Park. It is for this reason that DOC initially recommended a 1:200 replacement ratio for swamp maire in the Draft Land Exchange Report. This has been revised to 200 by Mr Ward (refer to Mr Ward's revised report in Appendix 4Ai). If successful this will result in up to 200 additional swamp maire. The conditions require the seeds to be eco-sourced.
Increase in the number of discovered swamp maire and ramarama trees in the DOC-Give site	Acknowledged that 17 swamp maire (as well as the presence of new seedlings) are present in the DOC-Give area. However only 5 swamp maire sit within the proposed footprint of the overburden area, which is smaller (at around 15ha) than the proposed exchange land at around 24 ha). The impact of the proposed overburden area will be considered at resource consent stage. ¹⁶⁸	Mr Ward confirms that there are 9 mature specimens of swamp maire in the DOC-Give site not 5.
The Applicant downgraded the ecological values of the DOC-Give site	All areas have a range of values. DOC-Give land contains some higher value areas related to special species or wetland, but these areas are the minority. The ecological assessment	Mr Ward's assessed the DOC-Give as Moderate-High values for vegetation, the DOC-Get sites is assessed as having Low-Moderate values. This is revised to Moderate for the DOC-

¹⁶⁸ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 1

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	used an averaged valued which best represents and does not hide the actual ecological value. The same approach was adopted for the DOC-Get land. The averaged result was tempered with an increased focus on the greater values of especially swamp maire and its habitat. ¹⁶⁹	Give sites when the Conditions Package A is table into account.
New Zealand Transport Agency		
- New Zealand Transport Agency (NZTA) is a road controlling authority for the nearby state highway and an adjacent landowner to the Firth site and Dry Creek - Agrees with the Applicant that there will not be impacts on NZTA administered land, nor will the exchange and associated use prevent or hinder the NZTA's ability to give effect to its designation - Has an interest in the proposed exchange sites for offset planting but are working through an alternative location elsewhere	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. An Outline Plan of Works has not been filed at Hutt City at this point in time but the Agency intends to do so.¹⁷⁰ The Applicant is supportive of NZTA's proposal to undertake offset planting in other areas and expects the informal interest NZTA has noted can be resolved through discussions. The Applicant will continue to engage with Waka Kotahi and GWRC to keep the Director General updated on any developments.	No response required. It is noted that the land exchange will have no impacts on the state highway or land administered by NZTA.

¹⁶⁹ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 3

¹⁷⁰ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.20]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	In the unlikely event that NZTA is unable to obtain approval to undertake its offset planting at other sites, this practical difficulty should be given very little weight in the statutory decision-making under the Fast-track Approvals Act. ¹⁷¹	
QEII		
- Neutral position - Primary interest in this proposed development is that the purpose and objectives of open space covenant 5-07-755 (instrument no. 10476608.1) are upheld, regardless of ownership	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. ¹⁷²	No response required. DOC is very aware of the presence of the covenants to the Firth Block and Northern Gully and the requirements of those covenants.
Taranaki Whānui ki te Upoko o te Ika		
Noted comprehensive engagement on the proposed land exchange. The issues raised by Taranaki Whānui are captured in the Cultural Values Assessment and the associated improvements package prepared for the application	No response required	No response required. The Cultural Values Assessment has been carefully considered in terms of the conservation values and the redrafting conditions. There is a new section added in the Final Land Exchange Report to increase the visibility of the cultural values.

¹⁷¹ Legal memorandum dated 5 March 2026 at [89-91]

¹⁷² Planning memorandum, Jade Wikaia dated 5 March 2026 at [3.10]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
Te Rununga o Toa Rangatira		
• Neutral position • DOC must be satisfied that the exchange results in a genuine conservation gain, with clear evidence that the values of the land received exceed, or appropriately offset, those of the land being relinquished. • Importance of independent ecological assurance, and robust assessment of ecological function of the habitats involved, including hydrological characteristics, species composition and regeneration potential. • Loss and vulnerability of swamp forest and consideration of the regional scarcity of such ecosystems. Swamp maire is vulnerable to myrtle rust and is a taonga species. • Protection of water bodies and associated species, comprising tributaries, wetlands and taonga species within the Belmont catchment • The proposed land exchange does not alter the enduring relationship of mana whenua with the Belmont landscape. Kaitiaki responsibilities remain irrespective of land tenure.	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.¹⁷³	The updated conditions proposed by the Applicant provide opportunities for Te Rununga o Toa Rangatira to be involved in the development of the Ecological Restoration Plan. The conditions formalise the process for recording feedback from mana whenua and incorporation of those matters in the Ecological Restoration Plan. Based on the conservation values of the sites (without taking into account proposed improvements through conditions), there would be: - a loss (no net gain) for biodiversity - flora and recreation; - no difference (and therefore no net gain) for cultural heritage values and freshwater ecology values; and - a net benefit for landscape and natural character and terrestrial fauna. This assessment changes slightly upon consideration of the improvements offered by the Applicant, with an increase in the conservation values of landscape, terrestrial fauna and botanical and vegetation elements for particular DOC-Get sites. The improvements

¹⁷³ Planning memorandum, Jade Wikaia dated 5 March 2026 at [3.8]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
		offered by the Applicant do not result in an overall change in net gain however. DOC initially recommended a 1:200 replacement ratio for swamp maire in the Draft Land Exchange Report. This has since been revised to a minimum of 200 specimens (refer to Mr Ward's response in Appendix 4Ai). If successful this will result in 200 additional swamp maire. The conditions require the seeds to be eco-sourced. Protection of waterbodies is a matter that would be addressed through a substantive application rather than the land exchange application.
Transpower New Zealand Limited (Transpower)		
- Transpower has statutory access rights under the Electricity Act 1992 that enable two separate transmission lines to cross the land that is to be swapped and become part of the Winstone Belmont quarry - Existing access tracks to the National Grid support towers are located within the land area to be transferred to the quarry. - The access tracks do not follow the legal road - In the event that the land exchange proceeds, Winstone and Transpower have agreed that	No response required. ¹⁷⁴	No response required. It is noted that the National Grid spans the DOC-Give site as well as the Northern Gully. It is noted that the National Grid will not be adversely impacted by the proposed land exchange. This is reflected in the Final Land Exchange Report.

¹⁷⁴ Planning memorandum, Jade Wikaia dated 5 March 2026 at [3.11]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
alternative, suitable vehicular access that meets Transpower's requirements can be established Confirms that National Grid assets and operations are not adversely impacted by the proposed land exchange and therefore has no objection to the land exchange		
Wellington Botanical Society		
Opposes the land exchange		The opposition is noted.
Particularly concerned about the swamp maire as it is 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	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.¹⁷⁵	The Southern Gully is not a proven potential site suitable for the swamp maire mitigation plantings. The delicate ecology of this species has mostly been ignored, with methods of transfer and 'potting up' being suggested when there is no evidence of these methods being successful. DOC initially recommended a 1:200 replacement ratio for swamp maire in the Draft Land Exchange Report. This has since been revised to a minimum of 200 specimens (refer to Mr Ward's response in Appendix 4Ai). If successful this will result in 200 additional swamp maire. The conditions require the seeds to be eco-sourced.

¹⁷⁵ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 3

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
Ramarama (Threatened-Nationally Critical, Regionally Critical) is also present on the site	The ecological assessment acknowledges the threatened status of Swamp maire and ramarama, but note that ramarama is also present in the DOC-Get. The values in the DOC-Get areas, swamp maire aside, are better with more areas of mature forest and Ramarama and rare habitat types.¹⁷⁶	There is some ramarama present in the DOC-Get area. It is only seen in the northern border of the Northern Gully block and western QEII covenant, not at the same volume or frequency as found in the DOC-Give land so a net loss. Ramarama is identified as a species for revegetation of Dry Creek in DOC's recommended conditions with a minimum of 500 plants. Any successful planting of this species will increase the numbers of this species. This requirement is required in the conditions.
While moving the southern part of the western boundary eastwards to exclude fourteen 6-10m maire tawake is good, deposition of the quarry overburden upstream will alter the hydrology of the site and very likely kill the trees regardless	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.¹⁷⁷ 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.¹⁷⁸	The future use of the DOC-Give area could not be considered as part of the freshwater ecology assessment.

¹⁷⁶ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, pages 2,8 and 10

¹⁷⁷ Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.90]

¹⁷⁸ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 4

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
- The ecological offset proposal to plant 200 maire tawake in Southern Gully is a reasonably positive action - The loss of ecologically complex forest, wetland, and loss of mature flowering and fruiting plants is not adequately compensated by a gain of regenerating scrub and a grove of young saplings - Does not consider there is 'net ecological gain' from destroying 24 of healthy in-situ trees, along with their habitat, and replacing them with 200 young plants to be managed for five years - Doubts transferring nine swamp maire will be successful	The establishment of 200 new swamp maire in the southern gully is not an ecological offset, it 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.¹⁷⁹ 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.¹⁸⁰ The proposal to use the DOC-Give area as a site for an overburden disposal area is to be assessed at the substantive application stage, when Winstone will be seeking resource consents and other approval types to enable the overburden disposal and associated activities.¹⁸¹	This rate of compensation as proposed by the Applicant for the loss of swamp maire is now considered to be sufficient. DOC initially recommended a 1:200 replacement ratio for swamp maire in the Draft Land Exchange Report. This has since been revised to a minimum of 200 specimens (refer to Mr Ward's response in Appendix 4Ai). If successful this will result in 200 additional swamp maire. The conditions require the seeds to be eco-sourced.

¹⁷⁹ Legal memorandum dated 5 March 2026 at [86-87]; Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 4

¹⁸⁰ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 4

¹⁸¹ Legal memorandum dated 5 March 2026 at [84]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
- The land exchange 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.	Considers 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 has been balanced by the improvement of establishing 200 swamp maire. 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.¹⁸²	Based on the conservation values of the sites (without taking into account proposed improvements through conditions), there would be: - A loss (no net gain) for biodiversity - flora and recreation; - no difference (and therefore no net gain) for cultural heritage values and freshwater ecology values; and - a net benefit for landscape and natural character and terrestrial fauna. This assessment changes slightly upon consideration of the improvements offered by the Applicant, with an increase in the conservation values of landscape, terrestrial fauna and botanical and vegetation elements for particular DOC-Get sites. The improvements offered by the Applicant do not result in an overall change in net gain however.
Questions the location of the acoustic recorders and considers there would be little change to the avifauna ecological values	Explained where the acoustic recorders were located and the habitat each was sampling from.¹⁸³	This is addressed in paragraphs 28-29 of Dr Burns' assessment of terrestrial fauna. He notes the drawbacks of understanding the avian value of a site by relying on sound alone as some species rarely verbalise, particularly outside of the breeding season or away from nests so will not be recorded using this method.

¹⁸² Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 4

¹⁸³ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 6

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
		He considers that the areas of tawa-kāmahi forest, hīnau-kāmahi forest, pukatea-rewarewa forest and pukatea-tawa forest in the Northern Gully and the small area of tawa-kāmahi forest in the Firth block should offer better quality native bird than most areas present in the DOC-Give site.
- The DOC-Give site 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.	Considers 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. ¹⁸⁴	As shown in the various technical assessments, there are some conservation values that score higher for DOC-Get sites than the DOC-Give. The stage of regeneration is reflected in the expert assessments.
Wellington Conservation Board		
- Prioritising avoidance of effects should be the principal concern in considering the application - Areas containing swamp maire and other scarce indigenous species and ecosystems should be protected wherever practicable	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	The test in the FTAA for land exchange applications is not to avoid effects, but the point is noted. The conditions have been crafted to improve the conservation values.

¹⁸⁴ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, pages 4-5

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	into the species. The improvement package is a conservation gain. ¹⁸⁵	DOC initially recommended a 1:200 replacement ratio for swamp maire in the Draft Land Exchange Report. This has since been revised to a minimum of 200 specimens (refer to Mr Ward's response in Appendix 4Ai). If successful this will result in 200 additional swamp maire. The conditions require the seeds to be eco-sourced.
- Landscape-scale ecological connectivity and catchment-level hydrological considerations must be adequately addressed - Assessment of landscape-scale ecology within the park, and surrounding catchment would be helpful	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 Western Escarpment to be incorporated within the Conservation Estate, strengthening the continuity of vegetated gully and spur systems.¹⁸⁶	The advice to DOC includes assessments on: - Landscape - Ecological – including freshwater, terrestrial fauna and flora A land exchange will not result in any change in hydrology, although this would be a relevant consideration for the substantive application.
It is hard to envisage how the proposed swap could provide land that is ecologically valuable as the park land considered for exchange	The DOC- Get land is 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.	The DOC assessments have assessed ecology in terms of: - Freshwater; - Terrestrial fauna; and

¹⁸⁵ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, pages 7

¹⁸⁶ Memorandum on landscape, Rhys Girvan dated 3 March 2026, pages 3-4

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	The substantive RMA application will address the loss and relocation of swamp maire arising from the development of the overburden area. 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.¹⁸⁷	c. Flora Based on the conservation values of the sites (without taking into account proposed improvements through conditions), there would be: - A loss (and therefore no net gain) for biodiversity - flora and recreation; - no difference (and therefore no net gain) for cultural heritage values and freshwater ecology values; and - a net benefit for landscape and natural character and terrestrial fauna. This assessment changes slightly upon consideration of the improvements offered by the Applicant, with an increase in the conservation values of landscape, terrestrial fauna and botanical and vegetation elements for particular DOC-Get sites. The improvements offered by the Applicant do not result in an overall change in net gain however.
Supports attempting to translocate 9 of the swamp maire to another location	While it is experimental, it is a very worthwhile attempt and will provide useful insight into the species.¹⁸⁸	Mr Ward has concerns about the viability of this. This is one of the reasons DOC initially recommended a 1:200 replacement ratio for swamp maire in the Draft Land Exchange Report. This has since been revised to a minimum of 200 specimens (refer to Mr Ward's

¹⁸⁷ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 7

¹⁸⁸ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 7

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
		response in Appendix 4Ai). If successful this will result in 200 additional swamp maire. The conditions require the seeds to be eco-sourced.
Sourcing suitable native species for replanting should be incorporated into plans	Consider that there is a suitable source of plants available locally. ¹⁸⁹	Eco-sourced only can be accepted, as this is Greater Wellington Regional Council policy as the land managers. The requirements for eco-sourced species has been included in DOC's recommended conditions.
- The timeframe and certainty of weed and pest control, and regeneration efforts is an important consideration for assessing overall conservation outcomes - The offset proposal does not clearly specify the duration propagation and planning swamp maire, or how security of long-term funding would be protected - Restoration, pest control, and offsets must be secured, legally and financially, for the lifespan of the quarry (assumed 30-40 years)	Agree that weed and pest management are offered and for a suitable period. The improvement package is a conservation gain, not an offset for a loss or removal of vegetation. This is a valuable conservation opportunity. Agree 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. land).¹⁹⁰	DOC agrees and has put effort into crafting conditions that will ensure sufficient weed and pest control and restoration planting. Similarly DOC recommends the propagation of a minimum of 200 swamp maire eco-sourced seedlings through the conditions. Written into the conditions is a minimum success rate to ensure an appropriate level of replacements for the the 9 mature swamp maire in the DOC-Give site.
If the exchange proceeds, it presents an opportunity for research relating to translocation of species, restoration efforts and changes in soil ecology over time	Agree that the exchange presents a considerable conservation opportunity to create a large swamp maire forest . This restoration project provides an excellent opportunity for	DOC agrees that it does present a research opportunity although Mr Ward has reservations about the likelihood of successful relocation of swamp maire.

¹⁸⁹ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 7

¹⁹⁰ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 7

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	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. ¹⁹¹	
- Finding a mechanism to honour the multi-generational commitment of volunteers in the park should be a key consideration in assessing the community impact - Growing native species for restoration activities, in conjunction with community organisations, including iwi, may provide an opportunity to further contribute to promotion of conservation values	The Applicant refers to the Ecological Restoration Plan, and states that 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. ¹⁹²	DOC agrees that the Ecological Restoration Plan presents an opportunity to meaningfully involve mana whenua in restoration efforts. DOC would support the wider community being involved in conservation efforts also.
The potential loss of amenity value and recreational opportunity should also be considered	Off-track opportunities are common in most areas within the Regional Park and there are no indications that the study area is particularly unusual. The track counter data is very likely to have counted all those accessing this area of the park via Buchanan's Road, including those not using Strava. The site visit did not reveal any "well marked connecting paths" and remain of the view that it is not developed for general recreation. These were also not identified in the Xyst review. Well marked paths should be patently obvious. ¹⁹³	Acknowledged and covered in the Recreation Technical Report.

¹⁹¹ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 8

¹⁹² Planning memorandum, Jade Wikaira dated 5 March 2026 at [3.35]

¹⁹³ Memorandum on recreation, Rob Greenaway dated 5 March 2026 at [14-16]

Organisation or person	Response from Winstone Aggregates	Response from DOC to the comments received
	Improvements offered in the exchange process must focus on the parcels of land being exchanged. The existing environment reflects no expectations for new recreation developments in the parcels under consideration.¹⁹⁴	
Supports incorporating mitigation efforts into a multi-generational, multi-organisation restoration plan for the park	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. The Applicant is unaware of the other processes underway, but agree that there may be opportunity for collaboration.¹⁹⁵	The conditions require that the Ecological Restoration Plan be approved by DOC as a pre-condition. The Ecological Restoration Plan presents an opportunity to meaningfully involve mana whenua in restoration efforts. DOC would support the wider community being involved in conservation efforts also.

¹⁹⁴ Memorandum on recreation, Rob Greenaway dated 5 March 2026 at [10-11]

¹⁹⁵ Ecology Addendum, BlueGreen Ecology, dated 5 March 2026, page 8

Appendix 3 – Comments received on the draft report

The comments received can be found on the EPA website:

<https://www.fasttrack.govt.nz/projects/belmont-quarry-development/land-exchange-application>

The following table is a summary of those comments.

Organisation or person	Response from DOC
Friends of Belmont Regional Park	
These observations are in addition to its earlier comments on the application	These comments are acknowledged.
Strongly opposed to the proposed land exchange as it would result in the unacceptable loss of a valuable ecological treasure and equally vital public recreation area, and that the initial concept for the application was rooted in inadequate environmental surveys	The land exchange application has been assessed in terms of the conservation values by the Applicant as well as experts advising DOC. Recreation, habitat and botany were all matters that were assessed.
The application is contrary to s 29(2) of the FTAA. The DOC assessment shows that the proposal would give no net gain, but FoBRP consider there is actually a clear net loss	The DOC assessment indicated: a. a net benefit for landscape and natural character, cultural and terrestrial fauna values. b. no difference (and therefore no net gain) for heritage and freshwater ecology values; and c. net loss (and therefore no net gain) for flora and recreation values. The Applicant's assessment indicates: a. a net gain for ecology (habitat, birds, lizards and freshwater), landscape, hydrology, recreation and cultural values; b. no difference (and therefore no net gain) for ecology (bats) and archaeology.

Organisation or person	Response from DOC
	It will be for the Expert Consenting Panel to decide whether the application meets the test of the FTAA.
The assessment is inconsistent in that it specifically ignores some future land-use changes (that would be an inevitable consequence of the land exchange being approved) but accepts other proposed “improvements”	Clauses 31 and 32 of the FTAA enables the Panel to impose conditions. The land exchange application must not consider the contents of the substantive application.
Strongly agree with the majority of the DOC draft report’s contents, most importantly: • The overall assessment of no net gain when all environmental value categories are taken together • The ambiguity of which version of the FTAA should be used. If the QEII covenanted land is discounted from the value comparison, this would significantly lower the overall value of the DOC-get area • The precious nature and rarity of the healthy swamp maire population and the high risk / unsuitability of the Southern Gully for mitigation planting • The recognised well-used recreational value of the DOC-give land and a low-nil recreational value of DOC-get lands • The very poor level of weed control in much of the DOC-get areas currently owned by the Applicant • The increased pest and weed incursion, with associated cost and responsibility to DOC and edge effects	The comments are acknowledged. These matters were considered by the experts advising DOC and are included in the appended technical reports.

Organisation or person

Response from DOC

Pages 42 and 43 of the DOC draft report contains an assumption that the DOC-get land will become incorporated into Belmont Regional Park and may be administered by Greater Wellington but this has not been agreed by Greater Wellington.

Agree that this assumption may not be correct and have deleted the sentences.

Page 5 of the draft DOC report notes that GWRC was appointed to "control and manage" Dry Creek Recreation Reserve in 1991, by Gazette notice. The legal test in cl29(2) of the FTAA (before the December amendment) relates to "land managed by the Department of Conservation". The FTAA (after amendment) changed this to "...Crown-owned reserves...". The DoC-give land is "a Crown-owned reserve" but it is not "land managed by DoC".

With respect to the changes to the test, accept that there is a change to cl 29 as well as the change to add cl 29(2A).

The former version of the law says: *(2) The panel must not grant the approval unless the panel is satisfied that the land exchange (including any money that may be received under clause 30 and any conditions that the panel may impose in accordance with clause 32) will enhance the conservation values of land managed by the Department of Conservation.*

And, the new law says: *(2) The panel must not grant the approval unless the panel is satisfied that the land exchange (including any money that may be received under [clause 30](#) and any conditions that the panel may impose in accordance with [clause 32](#)) will enhance the conservation values of conservation areas and Crown-owned reserves considered as a whole.*

As set out in this Report, the DOC legal position is the report should be prepared under the old law, but the Panel decision will be under the new. The Winstone's response largely agree, but have invited the Department also consider the exchange as if the new law were to apply through a set of new conditions in anticipation the Panel agrees with the Department's legal view. The Department's position on this issue and the application of the new law is addressed in sections 9 of the Report and the legal memorandum dated 7 July 2026.

Organisation or person	Response from DOC
Page 45 of the DOC draft report describes Toitū Te Whenua, but it has overlooked the policies in 6.2.1 (especially 1P, 5P, 6P, 7P, 8P, 11P and 12P and Natural Heritage Outcomes in 6.2.2, p47, (especially (A) i and ii)	The analysis of Toitū Te Whenua has been expanded to include some (but not all) of the policies listed. Only those that are relevant have been assessed.
Seeks recognition that the swamp maire within and immediately adjacent to the DOC-Give area are the only known mature swamp maire in Belmont Regional Park, and some of the most mature and healthy specimens of them locally. Seeks strengthened recognition of the risks of mitigation planting of swamp maire and imposition of a bond.	Mr Ward's assessment recognises that based on available information this species is not found anywhere else in the Belmont Regional Park. DOC supports the inclusion of a bond for restoration planting, and pest and weed management.
Considers there will be a loss of recreation value as no swamp maire will be accessible by the public	Refer to the response from Mr Harbrow. He agrees that the planting of swamp maire in the Southern Gully with the difficult access as originally proposed would not address the loss of recreation value for those who value its presence in the more accessible DOC-Give land. The revised public access provided to the Southern Gully from Liverton Road would improve the accessibility of the restoration plantings. The Southern Gully will offer a lower quality recreation experience given it is a narrow corridor between the quarry land and lifestyle blocks, that has had a degree of human modification.
Considers that there will be nil recreation value of the DOC-Get areas and a significant loss in recreation value	Refer to the response from Mr Harbrow. The contribution of heritage and biodiversity values to the visitor experience is already considered as a criterion in the assessment of recreation values for the DOC-Give and DOC-Get land. The experience offered in the

Organisation or person	Response from DOC
	DOC-Get land is not exceptional, but is valued by a small group of knowledgeable visitors. The difficulty of access to the DOC-Get land is acknowledged, but given access would be difficult, but not physically impossible, a nil value would not be appropriate.
Seeks a clear explanation as to why proposed improvements to DOC-get can be considered, but detrimental changes to DOC-give lands can not.	The assessments undertaken and the matters included in DOC's Land Exchange Report reflect the wording of the FTAA. Clause 24(b) requires details of any improvement work to be done to provide a net conservation benefit, and cl 32(1)(b) enables conditions to be imposed for improvements.
Considers that the DOC-Give parcel has a higher level of visibility than the low-moderate value attributed in the landscape assessment. It is visible from about 40% of the most commonly used recreation track in the park. The landscape assessment does not consider the landscape as views by recreators. • recommends that the DOC final report takes into account the negative effect of the changes consequent to any land swap being approved, regardless of any legal claim that those changes would not be relevant. • recommends that the DOC final report should more accurately describe the overall change in landscape values that would result from this application being approved to be a net loss	Refer to the response from Mr Head. He opines that if track users in Belmont Regional Park were assessed as a separate party, it may be that the visibility of the DOC-Give for this group would be proportionally greater, and a higher rating than Low-moderate may be concluded. As he has not walked all of the tracks, he cannot confirm the visible extent.

Organisation or person	Response from DOC
Agrees with DOC that there is no overall net gain in conservation values, but recommends that this message is made more clear in the summary texts, and that a net loss be described as such.	The technical assessments have been expressed in language that the FTAA uses. However the report has been updated to indicate where there would be a loss in conservation values.
Seeks inclusion of a condition moving the boundary of the DOC-Give 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	While this suggestion would retain some of the recreational value of the DOC-Give land, it would represent a different land exchange proposal to the one being assessed.
Seeks that the Panel consider alternative quarry sites	This is a matter for the Panel to consider for the substantive application.
Heritage New Zealand Pouhere Taonga	
Agrees with Mr Nester that “any transfer would not impact on the conservation of cultural heritage values”	The comments are acknowledged.
Reiterates that if any future proposal involves works that may modify or destroy an archaeological site(s) then an archaeological authority is required.	The comments are acknowledged. This will be a matter for the substantive application.
QEII National Trust	
Management requirements for open space covenant 5-07-755 – while the Applicant considers the ongoing management and maintenance burden on the Crown for the DOC-Get sites is anticipated to be low, more intensive management will be	The obligations of the QEII covenant is acknowledged as a legal and financial liability and risk in accordance with cl 26(1)(d) of the FTAA.

Organisation or person

Response from DOC

required given the level of weeds in some parts of the DOC-Get sites.

Part B, clause 7 of the covenant deed clarifies that the Covenantor is required to control weeds and pests in the Covenant Area to the extent required by any statute (the examples given being the Biosecurity Act 1993 and the Wild Animal Control Act 1977).

Part B, clause 4.1 of the covenant deed contains a broader obligation on the Covenantor: "No act or thing may be done or placed or permitted to be done or remain on the Covenant Area which in the reasonable opinion of the Board materially alters the appearance or condition of the Covenant Area or is prejudicial to the Covenant Area as an area of open space as defined in the Act".

This broad obligation also captures weed and pest control. While the Applicant may consider the current management and maintenance burden for the Covenant Area to be low, this may not always be the case, and QEII National Trust may require a different level of management or maintenance in the future (particularly once any pest plant and animal control required to be carried out by the Applicant ceases).

As above - the obligations of the QEII covenant is acknowledged as a legal and financial liability and risk in accordance with cl 26(1)(d) of the FTAA.

Understand that fencing requirements are to be discussed with QEII National Trust. Part B, clause 9 sets out the Covenantor's fencing obligations. Any fencing will be what is reasonably required to protect the Covenant Area from livestock. These requirements can change when adjacent land use changes, which may include a change in the specification of fencing

Fencing for the exclusion of livestock is expressly included in the conditions suggested by DOC.

Organisation or person	Response from DOC
required. Maintenance of any fencing must be carried out at the Covenantor's sole cost.	
Notes that an area of instability between the Firth Block and the quarry pit wall has been identified. We would prefer that any measures taken to prevent people from accessing the unstable area do not result in any further degradation of native vegetation	Installation of a fence is included in the conditions and will be the primary mechanism for excluding people from the potentially unstable area.
If it were quarrying activities that have caused this instability, that the Applicant would take further measures (in its current capacity as Covenantor) to stabilise that land, rather than simply recommend that people be excluded from accessing it. We propose, if the land exchange is to go ahead, that this is attended to prior to the exchange in order to reduce any further management burden being imposed on a future Covenantor.	DOC has added a condition around stabilising this area.
Notes that the Applicant's proposed draft pre-condition (4) would require installation of 60 metres of fencing set back six metres from the Firth Block pit face (in the location shown on Drawing W15069_Land_Exchange_Concept Boffa Miskell 1 December 2025). We understand fencing needs to be installed in practical places. However, the western boundary of the Firth Block (Area B of the Covenant Area) appears to already closely align with the Firth Block pit face. It appears installing fencing set back six metres from the Firth Block pit face would leave part of the Covenant Area exposed, and risks an assumption being made on the ground that anything outside the fence line is not part of the Covenant Area.	While DOC appreciates that QEII Trust would prefer to have the fence located on the boundary of the covenant, this may not be possible due to the depth of the area of instability and safety risks. The conditions enable an alternative location of the fence to be determined by an independent certified by a suitably qualified geotechnical engineer as being suitable to address the instability issues at the quarry face.

Organisation or person	Response from DOC
We propose, if fencing is to be required on this boundary of the Firth Block, that it is required to be constructed as close to the boundary of the Covenant Area as is reasonably practicable.	
Part A, clause 2.1.4 of the covenant deed notes that an objective of the open space covenant is to prevent subdivision (within the meaning of the Resource Management Act 1991 or any other equivalent replacement legislation) of the Covenant Area. The covenant deed was originally registered over two records of title (WN31B/39 and WN31D/969). QEII National Trust would prefer that the Covenant Area be held within one record of title, and we respectfully request that the Minister (or their delegate) take this into consideration when reviewing any survey plan prepared by the Applicant. However, the objective in Part A, clause 2.1.4 is still met if the Covenant Area remains split over two records of title following any land exchange.	The comment is acknowledged and can be considered at the time that the survey plan is developed.
Te Rūnanga o Toa Rangatira	
Notes that the applicant and DOC appear to have assessed the proposal using different methodologies and have reached materially different outcomes. This divergence underscores a broader uncertainty about whether the proposed mitigation and ecological offsetting can adequately address the loss of existing and functioning cultural, ecological and hydrological values.	While different assessments may have been used, the comment process to the Draft Land Exchange Report has allowed some of the differences to be raised and addressed. It is acknowledged that DOC and the Applicant differ on some conservation value ratings.
The overriding priority of Te Runanga o Toa Rangatira is ensuring that the mauri of te taiao is restored and upheld where possible.	The comments are acknowledged.

Organisation or person	Response from DOC
This requires a high level of confidence that any proposed approach will maintain or enhance ecological integrity, rather than relying on uncertain future gains to offset immediate and established loss.	
The extent of the difference between the applicant and DOC must be addressed ahead of the substantive application being considered.	It will be for the Expert Consenting Panel to decide how it wants to proceed and may include conferencing of experts to better understand the areas of agreement and disagreement.
Cultural values must be defined and assessed by mana whenua, not inferred through archaeological methods alone. Concerned by the report's conclusion that cultural values across the sites are 'low'. This appears inconsistent with the acknowledgement that the sites form part of a wider cultural landscape, with established whakapapa connections, historical travel routes, and ongoing relationships of kaitiakitanga.	Agreed, and it is for this reason that the cultural values are captured as a separate subject area. The Cultural Values Assessment Report along with the comments provided by mana whenua has informed the description of cultural values.
Errors in Appendix 2 whereby responses to Te Rūnanga o Toa Rangatira are incorrectly attributed to Taranaki Whānui.	Thank you for drawing this to our attention. Appendix 2 has now been corrected and updated to reflect the contents of Condition Package A.
Acknowledge that it is not clearly demonstrated that the land exchange will result in an overall enhancement of conservation values.	There is a difference in the conservation values assessed. The DOC assessment indicated: • a net benefit for landscape and natural character, cultural and terrestrial fauna values. • no difference (and therefore no net gain) for heritage and freshwater ecology values; and • a net loss (and therefore no net gain) for flora and recreation values.

Organisation or person	Response from DOC
	The Applicant's assessment indicates: • a net gain for ecology (habitat, birds, lizards and freshwater), landscape, hydrology, recreation and cultural values; • no difference (and therefore no net gain) for ecology (bats) and archaeology. It will be for the Expert Consenting Panel to decide whether the application meets the test of the FTAA.
Observe the reliance on uncertain future restoration outcomes, the loss of established wetland and ecological systems, and the importance of recognising existing ecosystem values. We also recognise the need to carefully account for existing protections, such as QEII covenants, to avoid overstating conservation gains, along with consideration of the potential for additional and ongoing long term management responsibilities for DOC. Furthermore, we acknowledge the long-term nature of the proposed offset and the need for sustained, successful pest and animal control for the applicant to achieve the proposed offset value. With this in mind, we emphasise the importance of ensuring that these requirements are clearly understood and adequately addressed.	All of the matters raised in this comment have been addressed in the Land Exchange Report and its appendices. Refer to section 9 for an assessment should QEII values need to be discounted.
Advises caution where current, established values are proposed to be exchanged for uncertain future gains	The assessments of both the Applicant and advisors to DOC are set out in the report. it will be for the Expert Consenting Panel to decide whether the application meets the test of the FTAA.

Organisation or person	Response from DOC
Priority is to ensure that their mokopuna and future generations inherit a thriving and resilient taiao, and that their relationship with the whenua, wai and wider landscape is upheld in a way that reflects their responsibilities as kaitiaki.	The comments are acknowledged. This emphasises the importance of the conditions should the Expert Consenting Panel approve the land exchange.
Transpower New Zealand Limited	
Has no concerns with the proposed land swap	The comments are acknowledged.
Transpower confirms that, based on the information supplied, National Grid assets and operations are not adversely impacted by the proposed land exchange.	The comments are acknowledged. This information is reflected in section 5.4 of the Land Exchange Report.
The Electricity Act grants Transpower the right to access tower structures situated on the land proposed for exchange. Transpower's statutory access rights under the Electricity Act 1992 are not altered by the change in land ownership / management and no additional easements or rights-of-way are required.	The comments are acknowledged. This information is reflected in section 5.4 of the Land Exchange Report.
Wellington Botanical Society	
Opposes the proposed exchange and considers it should be declined.	The comments are acknowledged.
The legal test in clause 29(2) of Schedule 6 of the FTAA requires the Panel to be satisfied that the exchange will <i>enhance</i> the	The assessments of both the Applicant and advisors to DOC are set out in the report. It will be for the Expert Consenting Panel to decide whether the application meets the test of the FTAA.

Organisation or person	Response from DOC
conservation values of land managed by the Department but this test is not met.	
There is a net loss for flora values even when the applicant's proffered improvements are included (illustrated in Tables 8 and 10 of the draft report)	Refer to Mr Ward's assessment of botanical conservation values, but his assessment is that there is not a net gain.
None of the DOC-Get sites approach the botanical value of the <i>Syzygium maire</i> (swamp maire, Threatened – Nationally Vulnerable) in Belmont Regional Park, sections of WF8 kahikatea/pukatea forest (Regionally Critically Endangered, 1% remaining), and a weed-free, structurally intact wetland gully system.	Refer to Mr Ward's assessment of botanical conservation values which takes into consideration these factors.
The change created by the Fast-track Approvals Amendment Act 2025 is important because Dr Burns' assessment states explicitly that <i>without the QEII sites</i> , the DOC-Give and DOC-Get are of comparable terrestrial fauna value	Refer to section 9 which contains the alternative assessment should the current version of the FTAA be used. If the current version of the FTAA is used, there is no change for terrestrial fauna as assessed by Dr Burns.
A reduction in values for recreation, flora net loss, unchanged freshwater values and conditions fauna gain means the exchange fails the enhancement test	The assessments of both the Applicant and advisors to DOC are set out in the report. It will be for the Expert Consenting Panel to decide whether the application meets the test of the FTAA.
Should it be approved, the minimum conditions should be: • a swamp maire offset ratio of no less than 200:1 (i.e. at least 1800 plants, following the 2019 NZTA precedent); • a funded long-term weed and pest management programme extending well beyond the applicant's proposed five years; and	After further consideration of the matters raised by the Applicant including the offset ratio for a resource consent and the area available in Southern Gully, Mr Ward has amended the conditions to include the planting of a minimum of 200 swamp maire. Refer to Mr Ward's assessment.

Organisation or person	Response from DOC
hydrological monitoring to assess impacts on swamp maire retained outside the immediate OBDA footprint.	The conditions as amended by DOC would have ten years for weed and pest management. Hydrological monitoring has not been proposed as a condition as this matter is more relevant to the substantive application.

Winstone Aggregates

Botanical assessment

The fundamental disagreement between Dr Keesing's assessment and Mr Ward's is methodological: Mr Ward's assessment is primarily based on botany, focusing on species lists and the presence of swamp maire (<i>Syzygium maire</i>), whereas the BlueGreen assessment applies a broader ecological methodology, evaluating habitat maturity, structural complexity, and landscape function across all four EIANZ assessment criteria — representativeness, rarity and distinctiveness, diversity and pattern, and ecological context.	Mr Ward confirms that he used the same criteria as Dr Keesing. He has amended his assessment to provide further clarity in relation to the assessment of the DOC-Give site.
Considers that Mr Ward has materially overstated the conservation values of the DOC-Give area. Areas of disagreement include: - rating of broadleaf shrubland area as moderate-high - ignored the area of exotic weed fields (30%) and young common native regenerating scrub (37%) - the scoring of the individual components of Mr Ward's assessment - inconsistencies between descriptions of representativeness and ranking	Having considered the comments, Mr Ward considers no changes to the assessment of values are necessary.

Organisation or person

Response from DOC

- diversity and pattern contains discussion about matters which are not related such as rarity. There is no WF8 kahikatea-forest in the DOC-Give
- The factors in the ecological context assessment

Considers that Mr Ward has under-valued the DOC-Get blocks. Matters of disagreement include:

- not factoring in the larger cumulative area of the DOC-Get areas
- the Firth Block and Northern Gully areas have more complex and aged and less disturbed communities than the DOC-Get area
- the Firth Block and Northern Gully have the same younger seral communities as the DOC-Give, and there is a rare forest type (tawa-kāmahi forest type), and they support perennial waterways
- Northern Gully and Firth Block should result logically in a higher than the DOC-Give result, because those areas are larger, older, more mature, of greater integrity, are mosaics of greater diversity and stature and have been less adversely impacted by past uses
- Northern Gully is high value due to the absence of understory mammal disturbance is important but so is the value related to the rare forest type (Tawa-Kamahi MF7 - endangered) and the Pukatea - Kahikatea (WF8 – critically endangered) type
- The Firth Block has this range of mature forest in basins through to complex steep shrublands and in all measures other than rarity, the Firth Block should be greater than the DOC-Give because of its age, less modification and complexity

Much of the areas suggested by Dr Keesing as early seral vegetation particularly in the Northern Gully area apart from the QEII covenant are planted areas over top of reshaped and reconstituted landforms which are of low value.

Having considered the comments, Mr Ward considers no changes to the assessment of values are necessary.

Organisation or person	Response from DOC
• The value of the Southern Gully exchange wetland area which Mr Ward ranks as moderate. The areas of difference are rarity and ecological context. • The value of Southern Gully is heightened by the potential for greater restoration through the proposed weed management and importance of the area in being able to establish a sizable swamp maire forest area • The small area of QEII covenanted area in Northern Gully to score higher and differently than the wider area	
Disagrees with the 200:1 offset for the planting of swamp maire, and considers that 200 is a more fair and proportionate level than 1800. If the Panel found more was required, the Southern Gully could support up to 600.	Mr Ward has reassessed and amended the offset rate accordingly. Mr Ussher made a good case for the NZTA decision being a resource consent condition not what is being discussed in the context of a land exchange application.
Mr Ward's analysis does not conform to the EIANZ (2018) values assessment protocol in its use of intermediate value rankings (moderate-high, low-moderate). Such intermediate values are not recognised by EIANZ	The DOC assessments all used a standard scale to rating to allow for direct comparison.
Considers that a low-moderate rating for the Southern Gully does not appropriately reflect such a sizable wetland. It must be considered as high or even very high following weed and pest and swamp maire planting.	Mr Ward does not consider the wetland to be of high value due to the state of infestation by non-native floral species.
Edge effects and their management are usually considered as a vegetation clearance effect through consent applications	Edge effects are relevant as the length of boundary would increase if the land exchange were approved.
Remain of the view that, taking into account the proposed improvements, principal of which is the addition of a large	The addition of two species of plant does not increase the ecological values of an area, it slightly increases the diversity.

Organisation or person	Response from DOC
number of swamp maire and Ramarama, the land exchange proposal will achieve a net conservation benefit for ecological values.	
How values were derived at are not clear	See Mr Ward's technical assessment where he has made additional clarifications.
Weed and pest management will raise the Cottle Block to meet the better northern elements, but does not raise the average over all value to a different rank. In the Firth Block the western edge buffer planting and the weed and pest control similarly protects the existing values and allows progression of the vegetation but the deficit in this area in terms of values is the absence of rarity and the weed and pest management does not cause rarity to change. The moderate ranking will persist. The Dry Creek area, however, will greatly benefit from the weed and pest management and supplementary planting and bring it up to a moderate value.	The Northern Gully area apart from the QEII covenant are planted areas over top of reshaped and reconstituted landforms which are of low value, some weed care will not improve the ecological value greatly in Mr Ward's opinion. The Dry Creek area, is however in such a poor state that the considerable amount of effort required to remove the high percentage of weedy species, followed up by the vast number of plantings, would likely slightly improve the area.
The flora assessment is flawed in the DOC summary report because the method for assessing composite value has been applied inconsistently, and omits consideration of parcel size	Having considered the comments, Mr Ward considers no changes to the assessment of values are necessary.
Winstone are proposing to plant 200 swamp Maire and 200 Ramarama along with pest control to support the planting in this area as part of Package B. This would add significantly to the values of those wetland areas and spread the location of populations of swamp maire	It would add some value, but plantings are not as valuable as natural.

Organisation or person	Response from DOC
Taking into account the proposed improvements, principal of which is the addition of a large number of swamp maire and Ramarama, the land exchange proposal will achieve a net conservation benefit for ecological values. Conservation values are further enhanced and provide even more benefit to the Crown if an additional 200 swamp maire and Ramarama in the Regional Park area proposed in Package B is provided.	The addition of two species of plant does not increase the ecological values of an area, it slightly increases the diversity.
Comments on conditions: • Agree with the purpose of Ecological Restoration Plan • The list of weed species is too wide • Annual weed monitoring is preferred over 6 monthly • Baseline mammalian pest monitoring is not warranted • Reduction target monitoring of pest animals is not required	Amendments have been made to the conditions: • The Ecological Restoration Plan will be an effective mechanism for managing restoration planning and weed management • The weed species list has been reduced to reflect the current weeds present • The reporting period has been lengthened to yearly • While baseline mammalian pest monitoring is not required, but measurable minimum targets are required
Dr Ussher compared the methodology of the Applicant and DOC assessment for vegetation Key differences include: • Vegetation units versus overall land blocks • Stated reasons for how a ranking was arrived at • Consideration of land parcels and areas of each community • The method for assessing composite value has been applied inconsistently	Refer to Mr Ward's report which has updated descriptions and reasoning for ratings.
Dr Ussher observes that more detail is required of how a value is arrived at. Considers the Blue Green Ecology reports are more transparent and systematic	The experts have made amendments to their technical reports where they consider more detail is warranted.

Organisation or person	Response from DOC
Questioned whether there should be a net gain in terms of freshwater values.	Refer to the response by Mr William.
Dr Ussher outlined the reasons for not supporting the replacement ration of swamp maire	Mr Ward has revised the level of planting of swamp maire to a minimum of 200. This is reflected in the conditions.
De Ussher provided further information on the proposed pest management duration. He considered that 5 years would be sufficient but herbivory gains will be lost quickly after cessation of control. 20 yaers will provides assurance of measurable gains	DOC recommends increasing the duration of pest management to 10 years.
Dr Ussher considers that the combination of land areas, land values, and enhancements offered by Winstone will ensure a net gain for the exchange in terms of ecological communities, important species (in particular swamp maire), and fauna.	This is different from the results of the experts advising DOC.
Outlined two ways in which the land exchange could There are two ways in which the land exchange could provide an overall enhancement of ecological values, even with the two QEII areas discounted. 1. Include an additional land parcel(s) not currently in public ownership or QEII covenant, 2. Identify land that is currently protected (for example Belmont Regional Park), within which ecology values can be enhanced to be at least 'Moderate'.	Either of these options are potentially outside the scope of the Application. Refer to section 9 and the legal memorandum in Appendix 6.
Outlined the actions of Conditions Package B which is proposed to take place within a part of Belmont Regional Park – including planting swamp maire, ramarama, weed control and possum control.	Refer to section 9 where this is addressed.

Organisation or person	Response from DOC
Freshwater	
Disagrees with the DOC assessment that the difference between the DOC-Get and DOC-Give values are neutral.	Refer to Mr Williams response and updated technical assessment.
Considers that the DOC assessment overinflated the DOC-Give areas in the exchange waterways and underrated the Northern Gully waterways but arrived at the same overall value (without consideration of the quantity of stream and habitat given and offered)	The DOC freshwater assessment method also provides an overall score for 'freshwater value' by using the maximum score for any single criterion. This is to make sure we are not underestimating values based on uncertainty and assumes a precautionary position. In the cases of the blocks that are given a medium-high rating, this is primarily due to the presence of wetlands which are a rare ecosystem in the Wellington Region. The assessment aims to give an indication of the overall freshwater values in each block using the information available, not provide a weighting scale to assess the blocks against each other. The freshwater assessment outlines the high-level values across all the blocks (give and get). Overall, while the values are assessed as medium-high for the give and get, Mr Williams does not have any significant concerns about the loss and gain of freshwater values due to the potential land swap taking place.
It is not clear whether Mr Williams had reviewed all the relevant information provided by the Applicant	Mr Williams' assessment was completed was based on desktop information and the information supplied by the applicant
An important consideration is that DOC has not undertaken any of its own surveys of the waterways in any season and has not collected its own data. A desktop review should not outweigh repeated site based observations.	The assessment completed by Mr Williams was based on desktop information and information supplied by the Applicant.

Organisation or person

Response from DOC

Areas of disagreement include:

- Exaggeration of the significance of intermittent aquatic habitat
- Presence of rarity and functional ecological contextual values
- Lack of recognition that the DOC-Give site holds predominantly ephemeral flow paths, with lesser amounts of intermittent reach and very limited amounts of perennial flow, whereas the DOC-Get site has substantive amounts of perennial waterway
- Likelihood of long fin eel
- Modelling presence of fish species

Refer to Mr Williams response and updated technical assessment.

The eDNA sampling locations to provide an accurate representation of the values to be found there

Refer to Mr Williams response and updated technical assessment.

The wetlands in the exchange are, on the east side, kiokio-sedge wet gully bottom sediment dominated features are riverine.

It is not a seepage/flush or an ephemeral wetland or other special "threatened" type. The DOC-Get wetland (Southern Gully) is also a riverine swamp

Description of the values associated with the farm pond including the tree fern gully habitat as of low value (young, simple, modified) and the manuka (kanuka) mixed broadleaf as moderate value the "wetland" being mostly open water as low value but the faunal value as high (avian).

Organisation or person	Response from DOC
Qualitative judgements and assumptions are based on the data collected and numerous site visits.	
Accepts that the nature of the waterways may change over time	
Confirms there is no quantitative survey information for the waterways in the Firth Block, but there is observational judgement. Includes a description of the waterways	
Confirms that there is no quantitative or qualitative survey information for the waterways present in the Dry Creek Block, there is very little stream habitat in the DOC-Get space. Therefore no values have been assigned in that area, i.e. no "value" gain is attributed to that habitat for DOC-Get	
DOC also incorporate aspects for the DOC Give site that are not relevant to the DOC Give site e.g. MCI downstream	
Comments on the assessment in terms of: • Representativeness • Diversity and pattern • Rarity	
Comparison of Dr Keesing's assessment against Mr Williams	
While DOC eventually conclude that the exchange is balanced, Dr Keesing is of the strong opinion that the exchange favours	

Organisation or person	Response from DOC
DOC, with DOC receiving more and better aquatic habitat than it releases.	
The freshwater values do not appear to have taken into consideration the much greater length of stream that is offered through the DOC-get parcels	
The DOC Get stream habitats are of greater lengths of better condition perennial reaches, with better instream condition and values than the DOC Give tributaries, and that raising the smaller, less flowing, less developed, more modified headwater tributaries of the DOC Give	
Recreation	
Clarifies that the annual estimate of 6,570 uses of the Buchanan Road Tramping Track was not solely derived from Strava data. While informal or seasonal use may not be captured, the effect on the overall conclusion is modest	Agree with this description.
Social licence as a criteria would require other assessments such as social impact	Refer to Mr Harbrow's assessment. Social license for exchanging away the DOC-Give land and acquiring the DOC-Get land was considered in the context of the recreation opportunities accorded by each. However, it was not a conclusive factor in the overall assessment.
Does not consider that unformed exploration tracks should be afforded the same weight as properly planned, sanctioned and maintained tracks when assessing the long-term recreation	Refer to Mr Harbrow's assessment. He considers that the presence of informal tracks and the use and maintenance of pest control lines

Organisation or person	Response from DOC
outcomes of the exchange and the “low” recreation value is warranted for the DOC-Give.	for access reflect the recreational value that some members of the community have placed on the DOC-Get land.
The proposed access from Liverton Road has implications for future nature-based recreation and will increase the DOC-Get recreation value from low to low-medium	Refer to Mr Harbrow’s assessment. He does not consider that the opening up of the right of way to wider public use under Improvement Package A would confer any additional advantage for planting and restoration activities undertaken by mana whenua or appropriately authorised volunteer groups. Allowing access to the DOC-Get land from Liverton Road for recreational users would improve the recreational value of the proposed exchange by offering legal and practical access into the Southern Gully, the proposed plantings of swamp maire and the Northern Gully. It is also possible that this access could improve linkages with other areas of Belmont Regional Park, but I note that the terrain at the end of the Northern Gully is steep. If visitors are encouraged to use this area, fencing would need to be installed to discourage people from entering the quarry and overburden disposal areas from the Northern and Southern Gullies. Liverton Road itself is a narrow access road that is single lane for much of its length. It has a number of blind corners and limited places for vehicles to pass. It is therefore poorly suited to supporting visitor use of the DOC-Get land.
If the conservation values of QEII were discounted, there would be a very minor impact on the assessment of recreation values, and the overall rating of the recreation values for the DOC Get and DOC Give land remains unchanged, regardless of discounting.	Refer to Mr Harbrow’s assessment. If the QEII areas were to be discounted, the DOC-Get sites have a Low conservation value for recreation.

Organisation or person	Response from DOC
Land contamination	
Northern Gully – there is an isolated pocket of dumped waste material including drums, metal, and other debris in the streambed. An area measuring 20 m x 25 m of concrete, corrugated iron, scrap metal, empty drums, a collapsed shed and an old refrigerator is on the adjacent stream embankment. Potentially localised contamination may be present within and hydrologically down gradient. A targeted investigation of this area is considered appropriate for contamination as a precondition.	The description has been updated in the report. The presence of this material and the risks of contamination have been reflected in the conditions.
The Preliminary Site Investigation for Northern Gully, Southern Gully and Firth block indicated no evidence of bulk storage of drums for fuel, chemicals or liquid waste. Additional investigation is not considered to be warranted in relation to this potential contaminant source.	The description has been updated in the report.
While the DOC report states there is the potential for ongoing contamination from adjacent quarrying activities, this is very low due to the nature of rock quarrying operations. The overburden in the Northern and Southern Gullies is not expected to represent a source of soil contamination.	The description has been updated in the report.
Dry Creek has been subjected to consented clean filling so the scope of soil investigation was limited as the potential for contamination was unlikely or low. Based on the results of testing near-surface soil there are no contaminants identified that would present a risk to staff / personal involved in planting or soil disturbance.	The description has been updated in the report.

Organisation or person	Response from DOC
There is no evidence that soil contaminants are present at concentrations that would present a risk to health of site users or the public	The description has been updated in the report. The presence of this material and the risks of contamination have been reflected in the conditions.
Suggested amendments to the conditions around contaminated land	The conditions have been further amended to reflect known potential contamination as well as unknown.
Landscape	
Mr Head's assessment is broadly consistent with the relative weighting in Mr Girvan's assessment including assessing the DOC-Give land as Moderate in landscape value, with low-moderate visibility. The areas of difference are Firth Block is ranked slightly higher and Dry Creek slightly lower in its existing condition. Mr Girvan does not consider those differences materially alter the overall landscape conclusion.	Refer to Mr Head's response where he agrees.
High level of consistency between Mr Head's and Mr Girvan's assessment of landscape values, with the DOC-Get land has greater collective value than the DOC-Give land, particularly if the proposed improvement package is secured through robust and measurable conditions.	Refer to Mr Head's response where he agrees. He is supportive of the Applicant's approach in principle to adopting the various DOC conditions of consent, should the land exchange be granted.
If the QEII values are discounted, the overall landscape comparison remains as a net benefit in favour of the Crown, particularly when the DOC-Get parcels are considered as a package and alongside the proposed improvement measures.	If QEII covenanted areas are disregarded, Mr Head assesses the overall ranking of the DOC-Get sites as 'Moderate'.

Organisation or person	Response from DOC
Edge effects, weed management, pest control, and the need for greater certainty around restoration outcomes are capable of being addressed through strengthened conditions and clear management obligations, including through the proposed ecological restoration / management framework	Refer to Mr Head's response. Following the land exchange (if successful), these land parcels will continue to be exposed to weed and animal pest invasion which needs to be recognised with robust conditions put in place. Some threats will continuously come from neighbouring land which is outside the Applicant's control.
Amended the visibility rating for Southern Gully to Low, acknowledged the more nuanced treatment of QEII-related associative value, and accepted that edge effects, weed management and pest control require greater certainty through conditions. This does not change the overall values.	The clarification is acknowledged.
Agrees with Mr Head that the DOC-Give land will not visually change much, if at all, simply as a consequence of the exchange	The clarification is acknowledged.
Northern Gully – it is important that the Moderate–High landscape value of Northern Gully is not dependent solely on its QEII status. Mr Head's assessment of landscape values is the same as Mr Girvan's.	The clarification is acknowledged.
Southern Gully – although there was an error in the rating of the visibility of this block, the overall landscape values are Moderate.	The correction is acknowledged.
Firth block – rated as Moderate-High landscape value and High visibility. If discounting of QEII covenanted areas is required, reduced weight may need to be given to any value arising from that legal protection or recognised conservation status. Discounting the covenant-related aspect does not remove the underlying landscape values of the land	Refer to Mr Head's response. He considers that regardless of the application of the legal test, the natural values of the land parcels remain, irrespective of whether there is a QEII covenant over them or not.

Organisation or person	Response from DOC
Firth block - There is a difference in associative values between Mr Head and Mr Girvan	The difference in assessment is acknowledged.
Dry Creek – difference in values between Mr Girvan who rated it as having Moderate landscape values, while Mr Head considered it to have Low-Moderate landscape values which reflects the differing consideration of the nearby quarry activity.	The Dry Creek land parcel is noted by Mr Girvan in his response statement as “...best understood as a restoration and consolidation opportunity”. This goes beyond the description of current landscape value. Or in other words, ‘restoration opportunity’ shouldn’t be conflated with current landscape value.
The conditions should be sufficiently certain to ensure that weed management is delivered, monitored and maintained, but sufficiently flexible to allow adaptive management where site conditions, reinvasion risk or best-practice control methods change over time	Mr Head agrees.
Planting and replanting will only materially improve landscape values where this is supported by measurable establishment, protection, replacement, weed control, pest control, monitoring and maintenance obligations.	Mr Head agrees.
Remains of the view that the DOC-Get land, considered as a package and alongside the proposed improvement measures and DOC’s recommended conditions, would make a stronger and more certain long-term landscape contribution to the Conservation Estate than the DOC-Give land	The assessment is acknowledged.

Organisation or person	Response from DOC
Hydrology	
If the conservation values of the two QEII Blocks must be discounted by the Panel when forming its view, the hydrological values within these blocks must also be removed from the hydrological analysis provided previously. This would remove from consideration the 436m of stream length in the Firth Block (142m of Order 6, 130m of Order 7, 77m of Order 8 and 87m of Order 9) and the 185m (95m $\geq$ Order 10 and 90m of Order 6) of stream length in the part of the Northern Gully that is subject to the QEII covenant. The proposed land exchange will provide DOC with: • Significantly longer streams i.e., maximum length of 463m compared to 265m; • Although there will be a reduction in the number of gully heads and ephemeral flow paths, there will be a significant increase in both the length and number of larger streams with higher and more resilient flow regimes i.e., 1,500m compared to 223m; • A significant increase in the total length of streams and watercourses i.e., 2,408m compared to 1,855m; • A significant increase in the upstream catchments contributing flow (i.e., 164.92ha compared to 89.2ha). This will ensure more stable and resilient flows in the larger streams which form part of the exchange • The land exchange will provide 'protected' hydraulic connections to several upstream catchments.	Refer to section 9, the report has been updated to reflect these metrics. The report has been updated to reflect the length of streams.

Organisation or person	Response from DOC
Even excluding the areas under QEII covenants, the proposed land exchange offers a range of attributes and advantages to DOC, providing a net benefit in favour of the Crown in terms of hydrology	Refer to Mr William's response. He confirms that the presence (or not) of the QEII block does not change his view of the values present as the values remain the same regardless of any covenant over the land.
Bats	
Provided further detail on the temperature during the bat surveys.	The further detail is acknowledged. Dr Burns is satisfied with the explanation provided.
Confident that the bat survey that has been undertaken is representative of bat activity at this site for this time of year and can be relied upon to detect bats that might have been intermittently present at the site	The further detail is acknowledged. Dr Burns is satisfied with the explanation provided.
The exclusion of the QEII sites would have no effect on values relating to bats or bat habitat due to the very low likelihood of bats using the site.	The clarification is noted.
Lizards	
Addressed the omission of closed-cell foam covers as a detection method for lizards but did not meaningfully diminish the survey's detection capability. On survey methodology, the 2025 Blueprint Ecology survey was appropriate, targeted, and well-suited to the habitat and species present	Refer to Dr Burns' response.

Organisation or person	Response from DOC
On habitat equivalence, Mr Burns accepts the applicant's core methodology of correlating lizard values with vegetation maturity and complexity. The areas most likely to support ngahere gecko at all sites are already assessed and mapped as high quality which is not disputed by Mr Burns	This is correct, see Dr Burns' technical assessment for further information.
Mr Burns contends that steep terrain and dense vegetation at the DOC-Get sites will limit the effectiveness of ground-based pest control relative to the more accessible DOC-Give sites however this is a shared characteristic between DOC-Give and DOC-Get.	Dr Burns considers the feasibility and effectiveness of ground pest control this to be a relevant factor due to: ground-based animal pest control is currently occurring in the 'DOC-Give' area, so benefits to terrestrial native fauna should have accrued at this site (mainly birds – as lizards are constantly highly vulnerable to predation by introduced mammals), and will continue if this pest control is maintained; the applicant has offered that pest control should occur over the 'DOC-Get' sites, so raising the feasibility of achieving this in practice, is relevant.
Seasonal rat trapping alone will deliver limited direct benefit to lizard populations	Refer to Dr Burns' response.
The land exchange does not rely on pest control delivering lizard population benefits at the DOC-Get sites. It rests on the substantial net-gain in lizard habitat extent and quality that DOC receives as a consequence of the exchange. The DOC-Get sites provide an increase of 14.36 ha of lizard habitat overall and 3.46 ha of high-quality habitat	Refer to Dr Burns' response.
The two areas of QEII covenant land have a notable influence of the quantum of lizard values being exchanged by excluding the	The report has been updated to reflect this difference.

Organisation or person	Response from DOC
conservation values assigned to the QEII covenants. The total area of lizard habitat at the DOC-Get sites is still greater by 2.2 ha, and the differences between high, medium and low value habitat effectively balance each other out such that a relatively comparable exchange in lizard values is achieved, slightly in DOC's favour.	
There is no deficiency in the habitat equivalence assessment. The land exchange delivers a meaningful and demonstrable improvement in lizard habitat extent and quality, and the assessment supporting that conclusion is methodologically sound.	The assessment is acknowledged.
Archaeology	
Agree with Mr Nester's assessment that the proposed transfer would not impact on the conservation of cultural heritage values	The agreement is acknowledged.
Agree with Mr Nester that the recorded archaeological site is of low cultural heritage value and that an Authority would be required if it was pre-1900 origin for any modification	The agreement is acknowledged.
Agree with Mr Nester that any archaeological sites identified in future would likely be of overall low cultural heritage values, but that the archaeological provisions of the heritage New Zealand Pouhere Taonga Act would still apply	The agreement is acknowledged.
While Mr Nester has ranked the archaeological significance or value of Site R27/910 low to medium, considers the significance	The report has been updated to reflect this.

Organisation or person	Response from DOC
is currently low. The ranking could be medium if any subsurface remains are established dependent on their condition and extent	
There is potential for archaeological remains of the tramway identified on an historical plan to also be present in both the Northern and Southern Gully sites. This would result in a low-medium ranking for archaeological value for Southern Gully.	The report has been updated to reflect this assessment.
Suggest deletion of the column for “cultural values” and replaced that this value is to be determined by mana whenua	While Mr Nester’s technical report has not been amended, the overall report has been amended to reflect this approach.
Archaeological values are not associated with or affected by QEII covenants and there is no reference to these values in the covenant. The relevant archaeological values of the exchange are therefore unaffected by the presence of QEII covenants	Refer to section 9 where this information is reflected.
Greater Wellington Regional Council	
Support in principle the use of land within Belmont Regional Park, consisting of two potential sites for biodiversity restoration and enhancement (the proposed works), which may be required for offsetting/mitigation purposes involved in regulatory requirements of the project:	Section 9 addresses Conditions Set B and reflects the information provided by Greater Wellington Regional Council.
Land that is part of the Conservation Estate (owned by the Crown but which is managed and controlled by Greater Wellington as Belmont Regional Park) in the immediate vicinity of the Proposed OBDA land; and	

Organisation or person	Response from DOC
A block of land known as the Heffernan Block that is within the Regional Park and owned by Hutt City.	
The proposed works are: • not currently subject to programmed works by Greater Wellington that would conflict with the proposed offset or mitigation activities. • generally consistent with the long-term management intent for the land, including ecological management and site restoration	Section 9 addresses Conditions Set B and reflects the information provided by Greater Wellington Regional Council.
The land is held as Belmont Regional Park land and managed by Greater Wellington and is subject to applicable statutory and management plan requirements being a recreation reserve	Section 9 addresses Conditions Set B and reflects the information provided by Greater Wellington Regional Council.
The letter confirms support from an asset management perspective only, and still needs statutory approval	Section 9 addresses Conditions Set B and reflects the information provided by Greater Wellington Regional Council.
Should statutory approval be granted for the Belmont Quarry Development Project, a separate agreement with Greater Wellington Regional Council will be required to address operational matters including access, health and safety, methodology of works, maintenance and monitoring, management and cost recovery / funding.	Section 9 addresses Conditions Set B and reflects the information provided by Greater Wellington Regional Council.

Organisation or person	Response from DOC
Legal issues	
The land exchange application should be fully determined under the existing law for the following reasons: • The legislative intention of the Amendment Act is that a land exchange application that is lodged under the existing law will be determined under the existing law • There is no separate decision made on a land exchange application except as part of a substantive application • The 3 parts to the definition of “application” • Does not believe that a land exchange application is required to be subject to different transitional provisions because it is subsequently part of a substantive application. • FTAA’s transitional provisions, including cl 6(1), Schedule 1 • the plain words (read literally) of cl 8, Schedule 1, would mean that a substantive application lodged after 31 March should be determined in accordance with the new law. This would not apply to the land exchange application component of any substantive application.	Refer to the legal memo dated 7 July 2026 in Appendix 6.
The DOC draft report and legal memorandum agree with Mr Matheson that the report must be prepared under the existing law	Refer to the legal memo dated 7 July 2026 in Appendix 6.
The Department says, the Expert Panel must apply the new law to the substantive application, but Mr Matheson does not agree.	Refer to the legal memo dated 7 July 2026 in Appendix 6.
Mr Matheson does not agree that it may be open to an Expert Panel to discount conservation values that are already protected	Refer to the legal memo dated 7 July 2026 in Appendix 6.

Organisation or person	Response from DOC
on the title of land proposed for exchange due to the breadth of the criteria under cl 26, Schedule 6 (Legal memorandum, [11]).	
The amendment in December 2025 was also accompanied by another change which effectively allowed an applicant to undertake works on other land so as to achieve an overall enhancement of conservation values	Refer to the legal memo dated 7 July 2026 in Appendix 6.
Agree that it might be possible for the Expert Panel to seek further information under s 67, and that if the Expert Panel did decide that the new law applied, then it would have to exercise this process in order to bring to it the relevant material on which to base a sound decision	Refer to the legal memo dated 7 July 2026 in Appendix 6.
Expressed concern that because an applicant would need to be able to respond to new information (and potentially other parties), then this effectively creates a “comments-process” which the FTAA has limited, in the context of a land exchange	Refer to the legal memo dated 7 July 2026 in Appendix 6.
Does not agree that s 68 would provide an avenue for the Expert Panel to seek comment from all parties, which as a matter of fairness it would need to do.	Refer to the legal memo dated 7 July 2026 in Appendix 6.
The Expert Panel will have to make a determination as to whether the existing law or the new applies to the substantive application for the land exchange	Refer to the legal memo dated 7 July 2026 in Appendix 6.

Organisation or person	Response from DOC
Given that the Panel may take a different view, Winstone Aggregates has developed 2 sets of conditions: a. Includes conservation enhancement works for the applicant's exchange parcels, but without applying any discount to the conservation values of land subject to a QEII covenant (ie the existing law). b. Includes conservation enhancement works primarily off the applicant's exchange parcels, and which would discount the conservation values of land subject to a QEII covenant	Refer to the legal memo dated 7 July 2026 in Appendix 6.and section 9.
Legal submissions	
DOC's overall approach to the statutory test for approving a land exchange in clause 29(2) appears to be one that requires a net benefit for each sub-category of conservation values. Winstone does not agree that there needs to be a net benefit for each category of conservation values	Refer to the legal memo dated 7 July 2026 in Appendix 6.
Methodological discrepancies results in difficulties comparing DOC values with those of Winstone	Refer to the legal memo dated 7 July 2026 in Appendix 6.
The lack of consistency and transparency in DOC's overall assessment is a potential legal error in DOC's assessment. The information must be presented in a clear, rational and consistent manner	Refer to the legal memo dated 7 July 2026 in Appendix 6.. The expert reports are clear, and provide how they reached their views on the values of the relevant areas.
The findings of the Cultural Values assessment prepared by Hikoikoi Management Limited are not adequately reflected. That	Refer to the legal memo dated 7 July 2026 in Appendix 6 and section 5.1.7 in the report. A new section has been created to give

Organisation or person	Response from DOC
assessment is that the exchange will result in strengthened cultural values and an overall uplift in conservation outcomes. Improvements and opportunities for partnership and active kaitiakitanga arise from the land exchange.	the Cultural Values Assessment more visibility. The cultural values have been added into all the comparison tables.
Suggestions that the land will form part of the Belmont Regional Park are incorrect	Refer to the legal memo dated 7 July 2026 in Appendix 6. It is accepted that a future decision will be required to determine the exact land status after the Panel decision pursuant to cl 34 of schedule 6 to the FTAA.
Suggestions that the effects of the substantive development of the overburden disposal area have been factored into the assessment in the appended technical reports.	DOC confirms that the potential future use of the DOC-Give site was not factored into the assessments.
The Hutt City Council vegetation encumbrance has been removed from the title to the Firth Block since the lodging of the report, and no longer requires consideration	Noted and all references to it have been removed from the report.
The Draft Report omits an assessment of whether the land exchange would be approved if DOC's proffered condition set were imposed. The technical assessments do not assess the conservation values against the DOC-offered conditions	This has been superseded by Conditions Package A which has been assessed by the various technical experts.
The discrepancies in methodology and information relied upon could be resolved by an expert conferral process.	The Expert Consenting Panel could direct expert conferencing if it felt it would be of assistance.
A key legal issue is whether the "enhancement" of conservation values is required to be considered on an individualised basis for each sub-category of value, or whether a holistic assessment is	Refer to the legal memo dated 7 July 2026 in Appendix 6.

Organisation or person	Response from DOC
required of all conservation values considered together. Winstone considers that clause 29 mandates an overall or global assessment of all types of conservation values considered together	
DOC considers that the post-commencement version of clause 29(2) must be applied in the panel's decision making whereas Winstone consider the pre-amendment version should be applied.	Refer to the legal memo dated 7 July 2026 in Appendix 6 and the Department's 29 May 2026 legal memorandum in Appendix 5.
It is uncertain which legal test will be applied by the expert panel and therefore two packages of conditions have been developed, with Package B applying should the Panel apply the post-commencement version of the FTAA	Addressed in section 9 of the Report.
Winstone considers that DOC's condition set may assign too many conditions to the clause 31 category. Some of DOC's clause 31 preconditions are not readily achievable within a two-year timeframe and are not strictly necessary to enable the land exchange to be effected	Addressed in section 5.7 of the Report. The conditions have been reorganised to reflect clauses 31 and 32.
As far as the applicant is aware the Minister for Conservation has not specified any "standard conditions" for land exchanges under s78. DOC cannot invoke section 78 by simply asserting that conditions ought to be imposed	Refer to the legal memo dated 7 July 2026 in Appendix 6. Section 78 conditions have been developed and are available for viewing. ¹⁹⁶

¹⁹⁶ https://www.fasttrack.govt.nz/__data/assets/pdf_file/0014/17060/Updated-Minister-of-Conservation-decision-re-section-78-conditions.pdf

Organisation or person	Response from DOC
The condition requiring review of the survey plan is unnecessary and the timing for review should not be open ended	DOC supports a two stage process for developing and finalising the survey plan. A draft process will enable any issues to be resolved and will make for a smoother finalisation process.
No objection to the deletion of the requirement to vest the sites as reserve subject to the Reserves Act 1977 but notes that the DOC land must be held for conservation purposes as a matter of law under the Reserves Act	Not a correct statement of the law. Refer to clause 34 of the FTAA.
The condition requiring full discharge of the vegetation protection encumbrance is unnecessary because that encumbrance has already been discharged	The discharge of the vegetation protection encumbrance is noted. The report has been updated to remove any reference to it. In addition, there are no remaining references to this in the conditions.
Consider there is no need for a bond, but if the Panel consider there is then more certainty is needed about the scale and what it is intended to address.	Clause 32(1)(b) enables conditions that require the applicant to bear the cost of any improvements to the land acquired by the Crown that the panel thinks necessary as part of ensuring that the land exchange will enhance the conservation values of conservation areas. A bond is precisely that – a cost of the improvements offered in the event that the Applicant does not fulfil the conditions. The wording proposed by Winstone sets out the works to which the conditions relate; that is, weed clearance, native planting, fencing, removal of rubbish, pest-management and any other works required under these conditions the Approval holder is required to undertake at its cost. DOC's intention was that the bond cover the risk of these works not being carried out, particularly as they are an important part of the Applicant's stated gain in conservation values.
Winstone has proposed amendments to the management plans to make them more workable	Addressed in section 5.7 of the Report. The conditions were significantly improved after receiving the draft Exchange Report, however there remains some areas of difference particularly whether

Organisation or person	Response from DOC
	the management plans should be certified by an external suitably qualified and experienced person or whether they are for approval by DOC. The approval process is to ensure that the mechanisms outlined in the management plans will achieve the minimum levels set out in Tables 1-3. The responses as proposed by the Applicant for pest management are not certain enough to be measurable. DOC prefers the minimum requirements as set out in the Draft Land Exchange Report.
There is disagreement between Winstone and DOC experts on the appropriate number of swamp maire to be planted	Addressed by Mr Ward in his response who has agreed with a reduced number.
Winstone has accepted DOC's requirement for 10 years of mammalian pest management, however it has proposed amendments to the monitoring and target species	Addressed in section 5.7 of the Report. The conditions were significantly improved after receiving the draft Exchange Report. The responses as proposed by the Applicant for pest management are not certain enough to be measurable. DOC prefers the minimum requirements as set out in the Draft Land Exchange Report. DOC accepts targeting of the key pest species set out in Table 3. Ten years pest management is supported, which reflects the comments made by Dr Ussher.
Winstone has amended the fencing conditions to be more certain and not require the Minister's approval.	Addressed in section 5.7 of the Report. In terms of boundary fencing, there is a s78 condition for this matter. The Applicant proposes a more narrow Condition 15 which requires fencing to be constructed where reasonably necessary to exclude persons, meet any existing covenant requirement, or address an identified safety risk. DOC can see the value of a tailored condition for fencing but suggests the inclusion of fencing to keep stock out of the DOC-Give

Organisation or person	Response from DOC
	sites which is consistent with the requirements of the QEII covenant. DOC considers there is no need to include the words “acting reasonably” and this introduces uncertainty into the condition. Condition 16 requires the Approval holder to install a fence along part of the quarry face against the Firth block. DOC supports the requirement for a barrier to be constructed to keep people away from the area that is subject to instability associated with the quarry face. However, DOC proposes the fencing requirement be extended further north along other quarry earthworked areas which are very close to the Firth Block boundary, and an approval process for the location and design. In the absence of a detailed design being set out in the conditions, DOC recommends inserting a requirement for the design to be submitted for its approval. It is important that this fence is appropriately designed for safety and to minimise risk, particularly given that the purpose of the fence is public safety and future liability for public safety on the Firth Block will be DOC’s responsibility. This will also enable the risk to vegetation to be minimised – a concern that was expressed by the comments from QEII Trust. DOC recommends including references to the Geotechnical Appraisal report rather than the Boffa Miskell diagram as it provides additional information. Because of the risks of geotechnical instability, clear signage is required to reduce the risk to people. DOC also proposes that Winstone be required to make good any issues with instability resulting in the future from the quarry activity.
Considers that the condition about the Biosecurity Act is redundant	This is a s78 condition and is considered to be appropriate.

Organisation or person	Response from DOC
Considers that the proposed land contamination condition is not specified by s78. States that it is unlikely that there is any contaminated land in the DOC-Give areas. Proposes a replacement condition to limit the period and extent of remediation required	Addressed in section 5.7 of the Report. DOC is concerned that the current drafting of those conditions provide no certainty that any contamination will be remediated and to what level. The definition of “land covered / piece of land” in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 is narrow and DOC is concerned that this may limit the identification and remediation of contamination. DOC considers that the s78 condition is more appropriate and provides more certainty to DOC. DOC therefore requires that the s 78 condition relating to contaminated land be imposed. In addition, the potentially contaminated area in the Northern Gully was discovered by chance during site visits. It was not the result of targeted and methodological surveys. There may be further historic dumping in the Northern Gully and therefore DOC does not support limiting it to the area identified in the Pattle Delamore Partners memorandum.
Winstone has deleted the condition about not proceeding with the land exchange as it is more appropriate to be included as part of a land exchange agreement rather than a condition on the land exchange approval.	This is an acceptable approach.
Whether the land exchange achieves the matters set out in the Conservation General Policy is not relevant to the decision-making process for the land exchange because the Conservation General Policy does not apply to reserves that are controlled and managed by administering bodies such as Greater Wellington Regional Council	Agree with respect to the land being given as part of the exchange. However, it is relevant to the DOC-Get land which would come into DOC ownership if the land exchange is approved. Addressed in section 5.5 of the Report.

Organisation or person	Response from DOC
Clarified the relevance of the paper road – it cannot be part of the land exchange unless a road stopping process is completed with Hutt City Council	Noted, and an explanation of this process external to the land exchange process has been added.
The assessment of liabilities and risks is one-sided in that it only considers the potential legal and financial liabilities associated with DOC taking ownership of the land exchange parcels. It does not consider the liabilities that DOC will be exposed to in the counterfactual scenario where the land exchange does not proceed and the status quo continues, e.g. potential liability to remediate contaminated land that has been found in that area. Overall, the potential exposure to the Crown associated with cleaning up rubbish and contaminated land is not significantly increased by it taking ownership of the DOC-get areas in exchange for the DOC-give area, and subject to the proposed condition package	Addressed in section 5.4 of the Report. The risk is increased for DOC as the Pattle Delamore Partners memorandum has identified an area in a waterway of the Northern Gully where historic dumping has occurred and there is the potential for contamination as a result.
There is a misconception about the potential land contamination risk from quarrying activities	The information from PDP was helpful explaining that the nature of quarrying is unlikely to result in contaminated land. The report has been updated to reflect this material.
Statutory tests for a land exchange	The analysis is acknowledged.
Set out an assessment against the purpose of the FTAA	The analysis is acknowledged.
Planning issues	

Organisation or person	Response from DOC
The stopping of the unformed paper road within the DOC-Give area is not a matter that can be determined through the FTAA process and is not part of the land exchange application	Noted, and an explanation of this process external to the land exchange process has been added.
Drawing on a range of technical assessments to describe the parcels results in descriptions that are not always presented in a consistent or readily comparable manner	The description reflects a combining of the technical descriptions provided by the Applicant and the observations of DOC's technical experts.
Winstone confirms that the Hutt City Council vegetation encumbrance has been removed from the title to the Firth Block since the lodging of the report, and no longer requires consideration	The confirmation is appreciated, and the report has been updated accordingly.
Appendix 2 does not fully reflect the breadth of comments received during the section 35(1) process. The views of key stakeholders, including those expressing support for or neutral position towards the proposal, warrant equal consideration alongside comments expressing opposition	This is only a summary and the primary comments are available if a reader seeks further detail.
The response to Te Rūnanga o Toa Rangatira comments includes reference to Taranaki Whānui ki te Upoko o te Ika	This was an error and has been corrected to reflect the contents of Conditions Package A and the involvement of mana whenua in developing the Ecological Restoration Plan.
The version of cl 29 that should be applied and the consequences of that	This is a legal issue and is addressed in section 5 of the report.
Different methodologies were used in the DOC assessments from Winstone	This is addressed in the responses of the experts.

Organisation or person	Response from DOC
Issues with the botanical assessment include: • Methodology • Value of the DOC-Give site • The number of swamp maire to be planted • The rating of the wetlands • Edge effects • Improvement packages • The effect of discounting the conservation values on the QEII covenanted areas	Refer to Mr Ward's response.
Issues with the freshwater assessment include: • Overinflation of the DOC-Give waterways and underrating the Northern Gully waterways but arrived at the same overall value (without consideration of the quantity of stream and habitat being given and offered). • Provided responses to the information gaps identified	Refer to Mr Williams' response
Describes amendments to the conditions for weed and pest control	The conditions are addressed in section 5.7 of the report.
Considers that from a hydrological perspective the proposed land exchange offers a range of attributes and advantages to DOC including increased stream length	The report has been updated to reflect this information.
Winstone assessment maintains that the DOC-Give land has low recreation value. The additional improvements proposed by Winstone, including public access from Liverton Road and the	Refer to Mr Harbrow's response.

Organisation or person	Response from DOC
swamp maire restoration area, increase the recreation value of the DOC-Get land from low to low-medium.	
Response to archaeology values assessment	This is acknowledged and reflected in the report.
Considers that the Draft Report does not appropriately reflect the cultural values evidence provided through the Cultural Values Assessment and the extensive engagement undertaken with mana whenua throughout the development of the proposal	There was considerable discussion of the Cultural Assessment Values Report, however this has been consolidated into a new section 5.1.7.
Mr Girvan notes there is broad agreement between his assessment and Mr Head's review, with both assessing the DOC-Give land as having Moderate landscape value and recognising that the DOC-Get land includes areas of higher landscape value, particularly within the Northern Gully and Firth Block.	Refer to Mr Head's response.
Interpretation of Conservation General Policy 6(a)	This section of the report has been updated.
The assessment of Toitu Te Whenua places considerable emphasis on the existing characteristics of the DOC-Give land and gives comparatively limited consideration to the broader conservation outcomes associated with the proposed exchange package, including ecological restoration, biodiversity enhancement and the addition of land to the conservation estate	The DOC-Give area proposed for exchange currently sits within Belmont Regional Park and is subject to the policies and direction set out in Toitū Te Whenua. The DOC-Get areas sit outside the Belmont Regional Park (unless and until a decision by the Minister to add the areas to the Regional Park is made if the exchange is approved by the Panel). Therefore, these areas are not covered by Toitū Te Whenua Parks Network Plan. It cannot be assumed that they will become part of the Belmont Regional Park and therefore the provisions cannot be applied to the DOC-Get sites.

Organisation or person	Response from DOC
Updated assessment of conservation values, including an assessment excluding values affected by the presence of QEII covenant	Refer to section 9.
Description of Improvement Package A: • Planting: Flora, pest control measures and physical works for up to 10 years (as detailed in the table attached in memorandum titled Improvement Package A). • Southern Gully: 200 swamp maire to be planted in the southern gully • Dry Creek Approximately 7,000 plants, of which 500 ramarama within 0.8 ha area • Firth Block: 1000 kamahi and 1000 kanuka • Addition of public access via the right of way to Southern Gully	This is reflected in section 5.7.
Description of Improvement Package B: • All of Package (A) • 200 swamp maire planting in the Belmont Regional Park, within the indicative area shown in Figure 1. • 200 ramarama planting in the Belmont Regional Park, within the indicative area shown in Figure 1 • 5 year weed management in Belmont Regional Park to assist with the establishment of 200 swamp maire and 200 ramarama • 10-year pest management in the Belmont Regional Park to assist with the establishment of 200 swamp maire and 200 ramarama	Refer to section 9.

Organisation or person	Response from DOC
Survey plan conditions - disagree with the DOC Draft Report reasoning for adding this condition, in particular the references to sufficient time to review and make changes as necessary and a no surprises approach. This feedback should have occurred as part of the Draft Report.	DOC supports a two stage process for developing and finalising the survey plan. A draft process will enable any issues to be resolved and will make for a smoother finalisation process.
Condition 3 - is accepted, with a minor amendment to (c)	Refer to section 5.7
Condition 4 – sets out expectations for working together	Refer to section 5.7
Condition 5 – Firth block pit fence conditions have been refined to require certification by a geotechnical engineer	Condition 16 requires the Approval holder to install a fence along part of the quarry face against the Firth block. DOC supports the requirement for a barrier to be constructed to keep people away from the area that is subject to instability associated with the quarry face. However, DOC proposes the fencing requirement be extended further north along other quarry earthworked areas which are very close to the Firth Block boundary, and an approval process for the location and design. In the absence of a detailed design being set out in the conditions, DOC recommends inserting a requirement for the design to be submitted for its approval. It is important that this fence is appropriately designed for safety and to minimise risk, particularly given that the purpose of the fence is public safety and future liability for public safety on the Firth Block will be DOC's responsibility. This will also enable the risk to vegetation to be minimised – a concern that was expressed by the comments from QEII Trust. DOC recommends including references to the Geotechnical Appraisal report rather than the Boffa Miskell diagram as it provides additional information. Because of the risks of geotechnical instability, clear signage is required to reduce the risk to people. DOC also proposes that Winstone be required to make good

Organisation or person	Response from DOC
	any issues with instability resulting in the future from the quarry activity.
Condition 6 – accepted	Refer to section 5.7
Condition 7 – 10 – generally accepted with clarity that only reasonable costs can be recovered by the Crown	Replaced with s78 conditions.
Condition 11 – wording change to reflect the public access easement from Liverton Road	This condition is supported, particularly as it enables public access to the Southern Gully.
Condition 12 – opposed to the application of bonds. If the Panel decides a bond is necessary, it should be limited to a practical, enforceable completion bond for the specific improvement works offered as part of the exchange, with clear works, clear timeframes, a fixed cap, defined default triggers, and release once those works are certified complete	Clause 3 2(1)(b) enables conditions that require the applicant to bear the cost of any improvements to the land acquired by the Crown that the panel thinks necessary as part of ensuring that the land exchange will enhance the conservation values of conservation areas. A bond is precisely that – a cost of the improvements offered in the event that the Applicant does not fulfil the conditions. The wording proposed by Winstone sets out the works to which the conditions relate; that is, weed clearance, native planting, fencing, removal of rubbish, pest-management and any other works required under these conditions the Approval holder is required to undertake at its cost. DOC's intention was that the bond cover the risk of these works not being carried out, particularly as they are an important part of the Applicant's stated gain in conservation values. DOC proposes deletion of the cap in Condition 12 as there is no analysis to support this being a value that the "Conservation Improvement Works" will not exceed. DOC considers that a more certain and clear way of framing the bond is to refer to the minimum requirements in Tables 1, 2 and 3,

Organisation or person	Response from DOC
	removal of rubbish, pest-management and any other works required under these conditions the Approval holder is required to undertake at its cost. A release schedule seems reasonable, but the appropriate trigger for the release of the first 50% is meeting the minimum success rates in accordance with Table 1, 2 and 3 after 7 years. Seven years is the timeframe for the planting of the swamp maire. DOC suggests restructuring the condition to have the conditions relating to drawing on the bond as separate conditions. An additional condition is recommended to make it clearer when the bond can be drawn upon.
Condition 13 - Winstone are not opposed to providing fencing where required, but note it is a large area, where some parts are inaccessible and where fencing is not practicable or necessary.	In terms of boundary fencing, there is a s78 condition for this matter. The Applicant proposes a more narrow Condition 15 which requires fencing to be constructed where reasonably necessary to exclude persons, meet any existing covenant requirement, or address an identified safety risk. DOC can see the value of a tailored condition for fencing but suggests the inclusion of fencing to keep stock out of the DOC-Give sites which is consistent with the requirements of the QEII covenant. DOC considers there is no need to include the words "acting reasonably" and this introduces uncertainty into the condition
Condition 14 - agree	Refer to section 5.7
Conditions 15 – 19 - Additional detail is provided regarding structures, improvements, site reinstatement and the condition of the land at settlement	Conditions 19 and 20 are s78 conditions which DOC requires be imposed. For Conditions 21 and 22, DOC prefers the equivalent wording of the s78 condition as they are clearer. Consequently, DOC requires that they be imposed.

Organisation or person	Response from DOC
	A number of assessments including that undertaken by Pattle Delamore Partners identifies rubbish in the Northern Gully. There may well be other areas where dumping has occurred that DOC and the Applicant are unaware of. DOC prefers the replacement wording proposed for Condition 23 as it reduces the liability to DOC should further areas where dumping has occurred and rubbish is discovered. Given the potential instability issues identified by the Applicant's Geotechnical Assessment, Condition 24 requires the Approval holder to take all steps reasonably necessary, at its own cost, to ensure that the stability of the Firth Block will not be undermined.
Condition 20 – Revised drafting of the Ecological Restoration Plans, with annual reporting instead of 6 monthly. Consider 5 years weed management is sufficient and that key weed species need to be identified.	Refer to section 5.7. DOC propose a number of amendments to make the conditions more certain. Annual reporting is considered appropriate and key weed species have been retained. 10 years is considered appropriate to manage weeds.
Conditions 23 and 24 - Provides further amendments to specify the consultation and input process for Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira into the Ecological Restoration Plan, including a comment process	This process is supported.
Condition 25-28- The revised drafting retains the pest management outcomes sought by DOC but provides a more practical framework for implementation, monitoring and adaptive management over time	The response triggers are not measurable or certain. DOC has therefore replaced these with measurable and clear targets.

Organisation or person	Response from DOC
Conditions 30 –31 The revised drafting clarifies the interests intended to remain following the exchange and how those interests are reflected in the transfer documentation.	Implementation of the Ecological Restoration Plan is important, and it is for this reason that it is a requirement of the conditions.
Condition 31- 42 - revised drafting to provides a clearer directive	Refer to section 5.7 where the changes proposed for the Ecological Restoration Plan are discussed.
Condition 39 – 42 – requires that any remediation of contaminated land must be to a level to comply with the National Environmental Standard	DOC is concerned that the current drafting of those conditions provide no certainty that any contamination will be remediated and to what level. The definition of “land covered / piece of land” in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 is narrow and DOC is concerned that this may limit the identification and remediation of contamination. DOC considers that the s78 condition is more appropriate and provides more certainty to DOC. DOC therefore requires that the s 78 condition relating to contaminated land be imposed. In addition, the potentially contaminated area in the Northern Gully was discovered by chance during site visits. It was not the result of targeted and methodological surveys. There may be further historic dumping in the Northern Gully and therefore DOC does not support limiting it to the area identified in the Pattle Delamore Partners memorandum.
Condition 44 sets out ways to address potential contamination in the Northern Gully site,	
Condition 45 Continuance of Rights – Winstone accept this condition	This condition is supported.

Appendix 4– Technical advice to DOC

- [Appendix 4A](#) – Botany, M Ward
- [Appendix 4Ai](#) – Response to comments on draft report - Botany
- [Appendix 4B](#) – Terrestrial fauna, Dr R Burns
- [Appendix 4Bi](#) – Response to comments on draft report – Terrestrial fauna
- [Appendix 4C](#) – Landscape and natural character, J Head
- [Appendix 4Ci](#) – Response to comments on draft report – Landscape
- Appendix 4D – Freshwater ecology, J Williams
- Appendix 4Di – Response to comments on draft report – Freshwater ecology
- Appendix 4E – Recreation, M Harbrow
- Appendix 4Ei – Response to comments on draft report – Recreation
- Appendix 4F – Heritage, R Nester

Appendix 4A – Botany, M Ward

[Separate document]

Appendix 4Ai – Response to comments on draft report, Botany

[Separate document]

Appendix 4B – Terrestrial fauna, Dr R Burns

[Separate document]

Appendix 4Bi – Response to comments on draft report, Terrestrial fauna

[Separate document]

Appendix 4C – Landscape and natural character, J Head

[Separate document]

Appendix 4Ci – Response to comments on draft report, Landscape

[Separate document]

Appendix 4D – Freshwater ecology, J Williams

[Separate document]

Appendix 4Di – Response to comments on draft report, Freshwater ecology

[Separate document]

Appendix 4E – Recreation, M Harbrow

[Separate document]

Appendix 4Ei – Response to comments on draft report, Recreation

[Separate document]

Appendix 4F – Heritage, R Nester

[Separate document]

Appendix 5 – Legal Memorandum

BEFORE THE PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application for land exchange by Winstone Aggregates under section 33 of the FTAA for the Belmont Quarry Development Project.

APPLICATION NO. FTAA-2603-L003 – Belmont Quarry Development – Land Exchange

**LEGAL MEMORANDUM – ANNEXURE TO REPORT PREPARED BY THE DIRECTOR-GENERAL OF
CONSERVATION UNDER SECTION 35 OF THE FAST-TRACK APPROVALS ACT 2024**

29 May 2026

Barrister Instructed:
Jeremy Prebble
Hawkestone Chambers

[REDACTED]

Shona Bradley Legal Services Manager DOC Te Papa Atawhai 99 Sala Street Rotorua 3010 Telephone: [REDACTED] Email: [REDACTED]	Amy Robinson Project Manager Fast Track Consenting DOC Te Papa Atawhai PO Box 10420 Wellington 6140 Telephone: [REDACTED] Email: [REDACTED]
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MAY IT PLEASE THE PANEL:

Introduction

1. This memorandum addresses the issue of what law the Panel's decision should be under with regard to the Fast-track Approvals Act 2024 (**FTAA**) as amended by the Fast-track Approvals Amendment Act 2025 (**FTAAA**). This issue arises because under the FTAAA the matters for the Department and the Panel for an exchange have been amended.

The change in provisions - purpose

2. The FTAAA sets out in s 55 the provisions that have changed. Without listing all detailed adjustments, the key changes to Schedule 6 are:

2.1 For referral applications, in cl 23 in describing the conservation values, rather than just explaining why the exchange would benefit the conservation estate, there is a need to include the details of anything registered or noted for conservation purposes on the record of title for the land to be acquired by the Crown.

2.2 Clause 26(1)(a) (which required a comparison of conservation values), to be replaced with more description, including when considering the conservation values of the land concerned:

How threatened or abundant they are.

A comparative assessment of the values that relate to each area of land concerned.

An explanation of why the exchange would benefit the conservation estate.

The impact of anything registered or noted for conservation purposes on the record of title for the land.

2.3 For the Panel, changes to cl 29 including:

Replacing "land managed by the Department of Conservation" with "conservation areas and Crown-owned reserves considered as a whole"

Adding a new cl 29(2A), which provides: "When considering the conservation values of the land to be acquired by the Crown, for the purpose of forming its view under subclause (2), the Panel must discount the extent to which the conservation values of that land are affected by anything registered or noted for conservation purposes on the record of title for that land." This final change is arguably the most significant of the various amendments outlined above and in the FTAAA.

3. There is little guidance in the Select Committee material and Departmental Report on these amendments.¹⁹⁷ The Departmental Report provides the Government's overall intention is for the changes to commence as soon as practicable, to ensure the benefits from the amendments are

¹⁹⁷ The Select Committee Report does not address this point, simply noting in respect to transitional provisions that:
Include commencement and transitional provisions—The Government intends to set specific commencement dates for different provisions in the bill and include transitional provisions. These suggested provisions are set out in Appendix 2 of the departmental report (See departmental report pp 82–84 and Appendix 2). Broadly, the Government proposes that:
- amendments that would not require the EPA to make updates to its systems would come into effect the day after Royal assent
- amendments that would require the EPA to update its systems would come into effect on 31 March 2026
- further transitional provisions would be added to avoid adverse effects on applicants, commenters, and expert Panels for applications that are currently in train. (Refer to page 13 Select Committee Report on the Amendment Bill).

embedded in the system as soon as possible.¹⁹⁸ This could justify having the amendment not apply to an exchange application that is about to be filed, yet, with the passage of time, for the adjusted test applying to the Panel's substantive consideration.

4. The Table at the back of the Departmental Report confirms the transitional provisions will have two transition points, to ensure applicants are not adversely affected.¹⁹⁹ This also indicates that, with the expanded powers available to the Panel to seek more information, it is not unreasonable for the later substantive consideration to be subject to the enhanced test.
5. In making these changes, the legislation appears to be balancing applications about to be made or in train, against requiring significant rework before being considered. This was enabled by having the ability to have the report from the Director-General under the old law and, if any changes are significant, the Panel will determine them or seek further information.
6. A related matter is whether discounting is required under the "old" section 29(2). As this note sets out below, the law applies as it stood when the application was made. That requires consideration of whether the exchange will enhance the values of land managed by the Department. Arguably, this is not the same as applying a discounting with respect to the areas already protected.

The Report by the Director-General on the exchange

7. The pre-amendment provisions in the FTAA apply to the Director-General's exchange report (and the attached exchange report has been prepared on that basis):
 - 7.1 In preparing the Director-General's report on Belmont's exchange application under cl 26 of Schedule 6 to the FTAA the Department must do so in accordance with the FTAA provisions as they were immediately before the "first commencement date" (17 December 2025) (refer to FTAA schedule 1, clauses 5 and 6(1)).
 - 7.2 "Application" is defined in cl 5 to include both land exchange applications and substantive applications – the application already lodged with the Department being an exchange application, but not a substantive application.
 - 7.3 The FTAA, as it was before the 17 December 2025 amendments came into force, continues to apply to an exchange application lodged before 17 December 2025. Winstones' exchange application was lodged before 17 December 2025, so the old law applies to the exchange application report prepared by the Department.

The substantive application and consideration

8. The Panel will need to determine if it substantively is under the old or new law, as outlined below, and then make a decision on whether the report fundamentally provides all of the information required to make a decision under the FTAA, noting in particular the tests at clauses 29(1), (2) and (2A) above.
9. With respect to the substantive consideration of the proposed exchange by the Panel, the key provisions provide:
 - 9.1 Under s 35(9) of the FTAA there is no discretion, an applicant must not lodge a substantive

¹⁹⁸ FTAA Bill, Departmental Report, page 83.

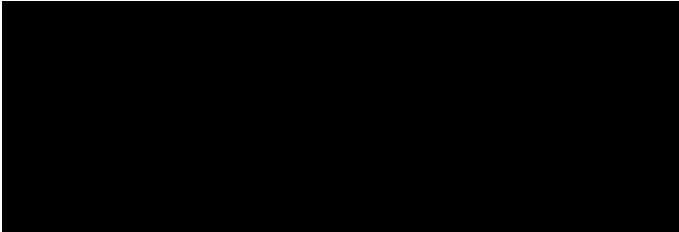
¹⁹⁹ FTAA Bill, Departmental Report, page 88.

application for an exchange for a project until they receive the report of the Director-General on the land exchange. That hasn't been provided, so Belmont is not yet entitled to lodge a substantive application. Noting "substantive application" means an application under s 42 of the FTAA for one or more approvals for a listed or referred project.

- 9.2 An application, if it includes an exchange, must comply with s 35(9) – see s 42(8). It is clear an application for a substantive application cannot be lodged until the report is provided by the Department under s 35 if it involves a land exchange.
- 9.3 As a substantive application has not been lodged, the savings provisions in clauses 5 and 6 of Part 2 of Schedule 1 (as inserted by the FTAAA) will not apply to it. Rather, cl 8 of Schedule 1 and the new FTAA provisions that came into force on 31 March 2026 ("second commencement date" as per cl 5 of Schedule 1) will apply to any substantive application Winstone makes. The old law will not apply to their substantive application.
- 9.4 These provisions mean that, when the decision is made by the Panel on the substantive application, all of the new exchange provisions that will be in force will apply. This includes new clause 29(2A) inserted by s 55(12) FTAAA, which will require the Panel in considering the conservation values of the land to be acquired by the Crown, to discount the extent to which the conservation values of that land are affected by the QEII covenant on the title for that land.
10. The applicant asserts that a relevant consideration in this case is cl 27 to Schedule 6. Clause 27 provides that the information required for the land exchange is the application and the report from the Director-General (provided under s 35). The clause makes clear that nothing more can be provided under s 43 (cl 27(b)). Superficially this suggests the total information that the Panel will have is the application and Director-General exchange report and, since they must be under the old law, it cannot be the case that the Panel can consider anything further.
11. However, this is not correct for the reasons in this advice and as set out below.
 - 11.1 The criteria in cl 26 pre-amendment are broad enough to enable the Panel to apply the new provisions in cl 29 and 29(2A) in particular.
 - 11.2 It is an oversimplification to say an absurd result will arise if the Panel's decision on the exchange is made under the new law. A key addition for the Panel in considering the exchange is cl 29(2A), noted above. Adding this consideration to the decision would not seem particularly onerous and would be able of being considered with the report as provided. The report has been carefully prepared to enable the Panel to consider what the position would be if the values attributed to the QEII land were discounted from the exchange consideration.
 - 11.3 If the Panel were to consider that the new provisions apply (as we consider it must), but thought it needed further information, there are mechanisms under the FTAA for that to be sought from the Department. For example, s 68 specifically provides that the Panel may request from the Director-General of Conservation any information on any issue relating to an application for land exchange.
12. When the Panel receives the Department's exchange report, it will need to determine what law applies when making its decision under s 81 and whether, having made that decision, it needs further information from the Department. More information or advice could be sought on the implications under

s 67, or s 68 of the FTAA.

13. Finally, it would seem difficult to argue the old provisions apply to the Panel and its consideration, but that these must be limited to the exchange. There are a range of generic provisions that have been amended, and it would arguably create more complexity and absurd consequences if the Panel was part in, and part out, of the old and new law.



Shona Bradley / Jeremy Prebble
Counsel for the Director-General of Conservation
29 May 2026

Appendix 6 – Legal Memorandum #2 dated 7 July 2026

BEFORE THE PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application for land exchange by Winstone Aggregates under section 33 of the FTAA for the Belmont Quarry Development Project.

APPLICATION NO. FTAA-2603-L003

**LEGAL MEMORANDUM #2 – ANNEXURE TO REPORT PREPARED BY THE DIRECTOR-GENERAL OF
CONSERVATION UNDER SECTION 35 OF THE FAST-TRACK APPROVALS ACT 2024**

7 July 2026

Barrister Instructed:
Jeremy Prebble
Hawkestone Chambers
[REDACTED]

Shona Bradley Legal Services Manager DOC Te Papa Atawhai 99 Sala Street Rotorua 3010 Telephone: [REDACTED] Email: [REDACTED]	Amy Robinson Project Manager Fast Track Consenting DOC Te Papa Atawhai PO Box 10420 Wellington 6140 Email [REDACTED]
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MAY IT PLEASE THE PANEL:

Introduction

1. This memorandum addresses legal issues raised by the Applicant Winstone (the **Applicant**) in providing comments (including legal submissions and annexed legal opinion) on the draft Land Exchange Report (**draft Exchange Report**) prepared on behalf of the Director-General of Conservation (the **Department**) under section 35 of the Fast-Track Approvals Amendment Act 2025 (**FTAA**).

Response to legal memorandum and opinion provided by the Applicant

2. The Applicant provided a legal response to the Department's draft Exchange Report, dated 15 June 2026 with the substantive responses from technical experts. It also included a legal opinion from Bal Matheson KC dated 11 June 2026.

Response to the Bal Matheson KC legal opinion

3. The view provided in the Department's legal memorandum dated 29 May 2026²⁰⁰ remains intact, including the points set out in that memorandum for the correct interpretation to which law applies for the Panel decision.
4. At a general level, the advice from Mr Matheson KC appears to accept that there is uncertainty, such that the approach now being taken is to have a "Plan B" for the Panel that addresses the new tests in the post-amended version of the FTAA, should the Panel find they apply.
5. For the reasons set out in the Department's 29 May 2026 legal memorandum, the Department does not agree with Mr Matheson KC's conclusion that the Panel should consider the exchange under the old provisions of the FTAA.
6. A component of Mr Matheson KC's reasoning rests on what he says: "makes sense". He considers that includes not having the application prepared under the old law but then considered by the Panel under the new law. With respect to Mr Matheson KC, this ignores the points made in the draft Exchange Report and above that the key components for the Department have not materially changed, such that the Panel will be in a position to undertake that assessment on the basis of the Department's Final Land Exchange Report (**Exchange Report**). In any case, and as noted in his advice, and the Applicant's response generally, they now appear to accept it is possible for the Panel to consider the new provisions and have, as a result, provided an alternative set of conditions in the event that is the approach taken.
7. Mr Matheson KC considers an absurdity arises if the Department's interpretation is adopted. With respect, that is also incorrect for the reasons outlined in the Department's 29 May 2026 legal memorandum, including the legislative intention at the time. In addition to those reasons, the base information is sufficient to inform the Panel for it to then make an assessment under clauses 29(2) and 29(2A).
8. Mr Matheson KC places considerable weight on the change to clause 29(2) but is mistaken as to the intention and effect of this provision (this point is addressed more fully below in response to the Applicant's legal memorandum). The wording does not enable considering any enhancement disconnected to the

²⁰⁰ Annexure 5 to the Department's draft Land Exchange Report, at: [*DRAFT-Belmont-Quarry-s353-land-exchange-report-29-May-2026.pdf](#)

land at issue but rather clarifies the enhancement can be to land not just managed by the Department but also Crown owned reserves, and that the enhancement relates to the area considered as a whole (not just the part being exchanged). In essence, the legislation is requiring consideration of whether the exchange of certain parcels of land with conditions related to that land will overall benefit conservation and conservation areas.

9. In saying this, that does not introduce an ability to claim the exchange itself is land plus enhancements to areas that are not subject to the exchange. This change in wording to clause 29(2) does not enable the consideration of enhancements to other land managed by the Department as a means to “bolster” the value of what is being offered. The enhancements need to relate directly to the land parcels being lost and provided.²⁰¹ This is confirmed when considering the scope of the conditions in clause 32(1)(b), which only relate to the land *being acquired* by the Crown (this point is also expanded on below).

Response to the key points in Winstone’s legal submissions dated 15 June 2026

10. Not all responses to the legal submissions are addressed here as many of them are more fully responded to in the main body of the Department’s Exchange Report. There are many points made and some are more factual in nature, so are addressed in other parts of the Exchange Report. Where there is a clear substantive legal point, it is responded to here.

Approach to clauses 29(2) / 29(2A) FTAA

11. In addition to the different stance on which version of the FTAA applies to the Panel, the Applicant asserts (paras 11 to 12 of their legal submissions) that the Department’s overall approach to the statutory test is wrong because the Department requires a net benefit for each subcategory of conservation values. Rather, the Applicant says, an overall or holistic approach to net benefit should have been taken (see also paragraphs 41 to 54 of the Applicant legal submissions). In response:
- 11.1 The points made by the Applicant are not accepted.
- 11.2 The use of different values was to ensure the Panel could clearly see the areas that are impacted by the exchange, and where the values are either addressed or not.
- 11.3 Logically before any overall assessment is undertaken it is necessary to first consider the relevant conservation values that the land holds and then consider how these are or are not addressed and enhanced. This is not to suggest that the Act requires that there be an enhancement in each individual value, but it is necessary to consider them individually before then considering how to overall assess the exchange proposal against the tests in the FTAA.
- 11.4 Following that, it is for the panel to consider if the tests in clauses 29(2) and 29(2A) are met (and the version of the FTAA that applies in this case).
- 11.5 The Exchange Report makes no final recommendation on the relevant tests but has provided

²⁰¹ Refer to [Hansard - New Zealand Parliament - Tuesday, 09 December 2025](#). As Hon James Meager (Minister for the South Island) stated when explaining Part 2 Amendments to schedule 6, the focus is on the exchange of land and benefits that flow from that exchange including through conditions of that exchange: “The second thing that Part 2 does—the very short and succinct and somewhat bland Part 2—is amend schedules related to land exchange in conservation. It amends Schedule 6 so that panels must consider the conservation values of **both land disposed of and land acquired**. It requires explanation of **why the exchange benefits the conservation land, and it ensures that any improvements required as conditions of the exchange are aimed at enhancing conservation values across conservation areas and Crown-owned reserves**—which, I think we’ll all agree, are very, very positive, pro-environmental, pro-conservation changes that will receive wide support from across the House, from all members.” [Emphasis added]

the Panel with the information necessary to undertake that assessment.

- 11.6 Accordingly, the applicant is wrong to suggest the Department is requiring an approach that each value needs to have a net benefit in order to meet the test in clause 29(2).

12. The Applicant argues (as part of its overall argument that the Department is incorrect about the law that applies to the Panel), that the Department assumed wrongly the land being obtained will become part of the Belmont Regional Park. And, the statutory test that applies at the time the application was lodged required there to be an enhancement to conservation values on land “managed” by the Department. Because the land is not managed by the Department (the Belmont Regional Park is a Crown owned reserved managed by the Regional Council) it cannot be assumed to be added back to the Park (paragraphs 19 to 21 and then again at 55 to 62 of the Applicant legal submissions). In response:

- 12.1 The position on the correct law to apply to the Panel is addressed above in response to Mr Matheson KC’s opinion and is covered robustly in the Department’s legal memorandum dated 29 May 2026.

- 12.2 With respect to the point about assuming the land will be added to the Belmont Regional Park, the Exchange Report has been clarified where this appeared in the draft version. The Department agrees it is not possible to assume that will occur as it requires a future decision of the Minister under clause 34 FTAA.

- 12.3 With respect to the old wording in clause 29(2), as set out above, and in the Department’s legal memorandum dated 29 May 2026, it is not critical for the Panel to assess this wording given its decision is under the amended wording in clause 29(2) – which confirms that the test is whether the application will benefit the conservation values of conservation areas and Crown-owned reserves considered as a whole.

- 12.4 However, even if the former wording in clause 29(2) were to apply, whether or not the land becomes part of the Belmont Regional Park is not foreclosed, but relies on a future decision. So, it is reasonable to consider, will the land benefit land held by the Department (which is in essence what is meant by “managed” by the Department).

13. Winstone argues, at a more fine-grained level, that what the discounting requires (assuming the Panel were to consider clause 29(2A) applies) is a nuanced consideration of what the terms of the QEII covenant provide, and then whether those terms will affect the values of the land being offered for exchange. Values that are not affected by the QEII covenant should not be discounted on this approach (paragraphs 66 to 67 of the Applicant’s legal submissions). In response to this:

- 13.1 The Department does not agree with the approach to what is and is not discounted.

- 13.2 The way the tests work under the law as amended is that when considering the conservation values of the land to be acquired by the Crown, for the purpose of forming its view under subclause (2) [as to whether the exchange would enhance the values of conservation land], the Panel must discount the extent to which the conservation values of that land [the land coming to the Crown] are affected by anything registered or noted for conservation purposes on the record of title for that land [the QEII covenant over particular blocks].

- 13.3 In this case, there is a QEII covenant protecting the conservation values of part of the land (the

top corner of the Northern Gully block, and the Firth block). The values of that land are already protected (that is how the QEII covenant affects those values). So, in deciding whether the values of the conservation land will be enhanced (whether the values will be greater following the exchange as compared to the values before the exchange), the values of the already protected land need to be discounted from values of the land coming to the Crown.

13.4 Put simply (and in line with the intent of the FTAA amendments) there is a QEII covenant protecting the conservation values of part of the land (the QEII blocks). The values of the QEII blocks are *already protected*. So, in deciding whether the values of the conservation land will be enhanced (i.e., whether there would be a “net benefit” from the exchange), the values of the QEII land need to be disregarded.

13.5 This interpretation best meets the purpose of the exchange provisions as it ensures that land that is already protected (safe) is not being used to count as part of an exchange as there is no overall net enhancement to conservation.

14. Finally, the Applicant argues that if the Panel does apply the new wording in clause 29(2), this enables consideration (as part of this exchange), of proffered enhancements to the conservation estate “considered as a whole”. The Applicant argues this because of the wording in clause 29(2) now asking whether the land exchange (and any money that might be received under clause 30, or any conditions that may be imposed in accordance with clause 32) will enhance the conservation values of conservation areas and Crown-owned reserves considered as a whole. The Applicant then goes on to outline an alternative Package B in the event the Panel does consider a discounting in respect of the QEII covenant applies (paragraphs 69 to 81 of the Applicant legal submissions). In response:

14.1 This point is responded to with respect to Mr Matheson KC’s advice above. The approach being taken by the Applicant is not correct.

14.2 The test in clause 29(2) relates to the *land exchange*. That is, the land exchange must result in an enhancement when considering the relevant overall areas. The fact that the consideration is against conservation areas and Crown owned reserves is to ensure that both reserves that are not managed by the Department as well as land managed by it are able to be considered for the purposes of the enhancement test in clause 29(2) of Schedule 6.

14.3 Clause 32(1)(b) referenced by the Applicant (legal submissions paragraph 57, footnote 28) which sets the parameters on what conditions the Panel can impose does not provide general authority to volunteer compensation disconnected from the exchange altogether. The FTAA has been clear to limit that to money under clause 30. But that is a recognised exception alongside the exchange itself and must be spent on the land to be acquired by the Crown, in accordance with clause 34(3) in any event.

14.4 Clause 32 also uses similar wording to clause 30 but makes it clear that the ability to impose conditions is limited to the exchange itself. In particular, the Panel may impose conditions on the applicant by way of “*improvements to the land acquired by the Crown*” that the Panel thinks necessary as part of ensuring that the land exchange will enhance the conservation values of conservation areas and Crown-owned reserves considered as a whole. This wording clarifies the scope of improvements are tagged to the exchange land itself, and not other land.

- 14.5 As noted above, clause 34 which the Applicant seeks to rely on (paragraph 57, footnote 28 of their legal submissions) is also limited to land directly subject to the exchange. In particular, clause 34(3) provides that money received under clause 30 for the purposes of the panel's decision under clause 29(2) "*must be used on improvements to the land acquired by the Crown*".
- 14.6 What this means is that the Package B conditions relating to land not directly part of the exchange being put forward by Winstone are *ultra vires*, as they are outside the scope of the Act's exchange provisions. Certainly, they should be given little weight by the Panel in determining if there is an enhancement to the conservation estate from this exchange.
- 14.7 In support of this point, Package B provides mitigation or compensation to areas already legally protected as Crown-owned reserve (planting and pest control in the Belmont Forest Park). Even if some form of offsetting is available, it would seem counter to the intended approach of these provisions to enable benefits or enhancements to be considered when the land is already protected, given the values of such areas are discounted when considering the exchange itself under clause 29(2A).

Cultural benefits as part of the exchange

15. The Applicant argues (para 15 to 18 of their legal submissions) the Exchange Report does not adequately address the findings in the cultural values assessment prepared by Hikoikoi Management Ltd.
- 15.1 The Department does not agree and has considered this above, along with the direct input from tangata whenua as part of the consultation process on the draft report.
- 15.2 These factors have been considered in the overall assessment of the exchange, and this point is further addressed elsewhere in the Department's report.

Consistency in approach/discrepancies between experts

16. The Applicant argues there are methodological discrepancies in the way that the Department's experts and their experts have approached technical assessments (paragraphs 31 to 34 of their legal submissions). In response:
- 16.1 This is addressed by the various experts' reports (which have been updated in response to the comments from Winstone). More fundamentally the criticism is not accepted.
- 16.2 The exact methodology does not have to be homogenous, nor does the FTAA require that. Provided experts adequately explain their approach as they would in any expert evidence or report, then it is not a mistake of law in how they undertook the task.
- 16.3 While the Applicant is critical of not having any expert conferencing (paragraphs 35 to 40), the Department has been careful to ensure a fair and transparent process has been undertaken given the range of other groups with a material interest in this matter.

Conditions

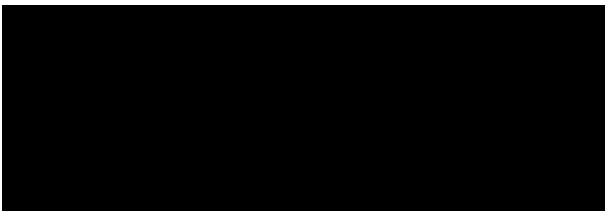
17. The Applicant addresses conditions in the legal submissions at paragraphs 82 to 125. The Exchange Report addresses conditions separately. On the key legal points, the following responses are made:
- 17.1 Section 78 conditions are able to be imposed as part of the exchange contrary to the view being

expressed at paragraph 87. That is clear when considering clause 33 and the reference to clause 26(2). Clause 26(2) provides that the Department's Exchange Report must specify any conditions under section 78 that the Panel must impose. With respect to the ability to impose section 78 conditions on exchanges this is a matter that has been determined already by the Minister.²⁰²

- 17.2 The above point on s 78 conditions applies for other conditions outlined as well (paragraph 118 to 122), in particular as related to contaminated land.
- 17.3 To the extent that conditions are imposed, the Department has been careful to ensure that they fall within the scope of clauses 31, 32, or as required by s 78.

Other matters

- 18. The Department agrees with the Applicant that the Conservation General Policy (CGP) does not apply to Reserves that are administered by other agencies in this case the Regional Council.
- 19. With respect to the paper roads, most ownership of roads are for a stratum title under s 316 of the Local Government Act 1974. This matter will need to be resolved as part of the substantive application. It is understood the intention is the underlying land beneath the Paper road is staying with the Crown.
- 20. In terms of the legal risks section of the Exchange Report: it is not accepted that the Report is biased or one sided. The "legal risks" section (and FTAA) does not require a counterfactual scenario to be tested, but rather requires the Department to advise on what the legal and financial risks are if the exchange goes ahead.



Shona Bradley / Jeremy Prebble
Counsel for the Director-General of Conservation

7 July 2026

²⁰² https://www.fasttrack.govt.nz/data/assets/pdf_file/0014/17060/Updated-Minister-of-Conservation-decision-re-section-78-conditions.pdf

Appendix 7B: Conditions proposed by Applicant - Package A

Draft conditions proposed by Winstone in response to the Draft Report

This approval for land exchange is conditional until the Minister of Conservation is satisfied that Conditions 1 to 46 below (being pre-conditions imposed in accordance with clause 31 and conditions imposed in accordance with clause 32 of Schedule 6 of the Fast-Track Approvals Act 2024) are complied with.

Definitions:

Approval Holder Means the authorised person for the purposes of the Schedule 2 listing, being Winstone Aggregates (A Division of Fletcher Concrete and Infrastructure Limited), or any successor approved in writing by the Minister, being the entity to whom approval is granted under these conditions.

Approval holder's land: Means the land in the ownership or control of the Approval Holder that is subject to the Land exchange and identified as the parcels known as:

- Northern Gully: means the area of land comprising approximately 12.62 hectares being part of Lot 1 DP 60552 and Lot 5 DP322126, and as identified in approved plan [x]
- Southern Gully: means the area of land comprising approximately 3.94 hectares, being Lots 4 and 5 DP 32212, and as identified in approved plan [x]
- Firth Block: means the area of land comprising approximately 9.6 hectares, being part of Lot 1 DP 60552 and Part Lot 1 DP 22561, and as identified in approved plan [x] and
- Dry Creek: means the area of land comprising approximately 7.94 hectares being Part Lot 1 DP 28205, and as identified in approved plan [x]

DOC – Get: Means the land to be transferred from the Approval Holder to the Crown and administered by the Department of Conservation, comprising the Approval Holder's land and shown on approved plans x.

DOC – Give: Means the land currently owned by the Crown and administered as part of the Belmont Regional Park that is to be transferred to the Approval Holder, comprising approximately 23 hectares (more or less), as shown on the approved plans [X].

Crown Land: Means land owned by the Crown and held for conservation or reserve purposes, including land administered by or on behalf of the Department of Conservation under the Conservation Act 1987 and/or the Reserves Act 1977.

The Minister: Means Minister for Conservation, or any person acting under delegated authority on behalf of the Minister, in accordance with the Conservation Act 1987 or the Reserves Act 1977.

Proposed Draft Pre-Conditions for land exchange

To prepare the land for exchange, the following pre-conditions are imposed under schedule 6, clause 31 and must be completed within 2 years of the date of approval:

1. The Approval holder must provide a draft survey plan to the Minister no less than 10 working days before submitting the final survey plan under condition 2. Any comments provided by the Minister within that period must relate only to the identification of the exchange boundaries and required transfer mechanics.
2. The Minister or the Minister's delegate must, acting reasonably, approve or reject the final survey plan within 10 working days of receipt. Any rejection must be accompanied by written reasons. If no response is given within that period, the plan is deemed approved.
3. The Approval holder shall obtain all consents and approvals required to separately define the Applicant's land and to enable ownership of that land to be transferred to the Crown. The Approval holder's land will be provided free of all encumbrances and interests, except for the following interests that must remain in place and be brought down onto the new titles:
 - a. Open Space Covenant Pursuant to Section 22 of the QEII National Trust Act 1977 (Lot 1 DP60552 and Part Lot 1 DP22561 – Creating document 10476608.1);
 - b. Right of way over Part Lot 1 DP28205 (Creating Document 701267); and
 - c. Easement in Gross – Quarrying effects, shown on Lots 4, 5 and 100 DP322126, burdened land Lots 4, 5 & 100 DP322126 (creating document 5835385.5).
4. The Crown and the Approval holder must each promptly do all things reasonably required to enable the Crown Land to be transferred to the Approval holder as fee simple land, free of encumbrances and without reserve classification on Gazettal. The Minister must not unreasonably withhold, delay or condition any approval or execution required for that purpose.
5. Before settlement, the Approval holder must install a fence approximately 60 metres in length and set back 6 metres from the Firth Block pit face in the location shown on Drawing W15069_Land_Exchange_Concept Boffa Miskell 1 December 2025, or as otherwise certified by a suitably qualified geotechnical engineer for equivalent safety outcomes. The design and location certification must be provided to the Minister before construction.

Encumbrances

6. The Approval holder will transfer its estate and interest in the Approval Holder's land to the Minister free from all leases and tenancies and discharges from all mortgages, charges and other encumbrances other than those listed in Condition 3.

Costs

7. For avoidance of doubt all reasonable costs associated with complying with Conditions 1 to 6 shall be met by the Approval holder.
8. The Approval holder must pay the Minister's reasonable costs and expenses of, and incidental to, preparing and signing the Exchange Agreement or any extension or variation of it, including surveying, conveyancing and legal costs.
9. The Approval holder must pay all reasonable costs associated with the Minister's work to give effect to the Exchange Agreement, calculated at DOC's standard cost-recovery rates current at the date the work is undertaken and invoiced within 3 months of the relevant work being completed.
10. The Approval holder must pay in full immediately and on demand all reasonable costs and fees (including solicitors' costs and fees of debt collecting agencies engaged by the Minister) arising out of and associated with steps taken by the Minister to enforce or attempt to enforce the Minister's rights and powers under the Exchange Agreement including the right to recover outstanding money owed to the Minister.

Easements

11. The Approval holder shall survey and register the appropriate easements as shown on Scheme Plan SC-02 (Appendix B10a), including but not limited to:
 - a. Easement Z (Right of Way) to be granted over part of Lot 9 for the benefit of Lot 10 (comprised in the DOC-Get Area) for the purpose of conservation activity and maintenance undertaken by DOC or its agents and public pedestrian access. DOC shall have the full and unrestricted right of access, including the right to enter, pass, and repass on foot or by vehicle or machinery, together with its employees and contractors, for the sole purpose of accessing adjoining conservation land for inspection and maintenance related to conservation purposes. Public pedestrian only access shall be permitted, subject to any reasonable temporary restrictions required for public safety, ecological restoration works, pest or weed control, maintenance, fire risk, weather events, or quarry operational safety and may be reasonably determined and specified from time to time by the grantor. DOC shall have the right to carry out inspection, maintenance, repair, and improvement works on any tracks, roads, or structures within Easement Z as reasonably required for conservation purposes and managing public pedestrian access subject to standard terms regarding the suitable

management of health and safety obligations and ensuring that the grantor has reasonable prior notice of the intended access and programme of works.

Bonds for Conservation Works

12. If the Land Exchange is approved, the Approval holder shall provide to the Minister, before giving effect to the exchange, a performance security ("Bond") for the purpose of ensuring completion of the "Conservation Improvement Works" defined below. The Bond shall:

(a) **Scope:** Secure the Approval holders timely performance of all identified Conservation Improvement Works on the land to be given, as specified in Conditions 13, 22, 27 and 28 (for example, weed clearance, native planting, fencing, and pest-management), but shall not cover any other obligations.

(b) **Amount:** Be in an amount equal to the reasonably estimated cost (as certified by an independent Quantity Surveyor or registered valuer or contractor) of completing the Works. The Bond amount shall be subject to audit and revaluation by mutual agreement (or by binding expert determination if disputed). In no case shall it exceed a specified cap \$200,000.

(c) **Form:** Be provided by way of a performance guarantee by a group company of the Approval holder which provides performance security, or (if preferred by the Approval holder) an unconditional bank guarantee or irrevocable performance bond from a NZ-registered bank or insurer reasonably acceptable to the Minister (alternatively, a cash deposit may be lodged).

(d) **Release Schedule:** The Bond shall be released in two stages:

(i) fifty percent (50%) upon completion and acceptance of the specified Conservation Improvement Works by the Minister or the Minister's agent; and

(ii) the remaining fifty percent (50%) at the close of the 24 month maintenance period following such completion, provided the land remains free of noxious weeds and meets agreed success standards. If all Conservation Improvement Works are completed to satisfaction before the expiry of 24 months, the second half may be released early.

(e) **Default and Call:** The Bond shall only be drawn upon if the Approval holder fails to complete the specified Conservation Improvement Works by the agreed deadlines (or maintain them during the maintenance period) after receiving written notice and a 30 working day cure period. Any call on the Bond shall be limited to the cost of completing or remedying the Works, and the Applicant may dispute any call by written notice; unresolved disputes will be referred to arbitration in New Zealand under the Arbitration Act 1996 before funds are released.

Conservation Improvement Works means those specific enhancement works or restoration measures agreed by the parties and detailed in an annex to these conditions (for

example, specified planting areas, pest-proof fences, access tracks, or restoration of riparian margins).

The Bond is a section 78 condition (Crown risk condition) and shall not be used as a penalty. The value of the Bond is expressly intended to cover only the cost of completing the above-defined Conservation Improvement Works.

Fencing

13. The Approval holder must construct, only that boundary fencing which is reasonably necessary to exclude persons, meet any existing covenant requirement, or address an identified safety risk on the external boundary of the land being transferred to the Crown. The required locations and fence standard must be identified in a pre-settlement fencing plan agreed by the parties, acting reasonably.

Rates

14. There shall be no apportionment of rates or other outgoings paid by the Parties.

Structure and improvements, condition of land

15. The land being acquired by the Approval holder, including any structures or improvements thereon, is transferred and accepted by the Approval holder on an “as is, where is” basis.
16. The Minister accepts no liability (financial or otherwise) in relation to any structure or other improvement on the land being acquired by the Approval holder, including for any remedial, removal, or maintenance costs associated with any structure or improvement.
17. The Approval holder must remove from the Approval holder’s Land only those structures, improvements or materials identified in a joint pre-settlement schedule prepared by the parties, no later than 20 working days before settlement. Reinstatement is limited to areas directly disturbed by that removal.
18. Any structure or improvement expressly agreed in writing to remain on the Approval holder’s land at settlement must, as at settlement, be safe for its intended use and lawful so far as reasonably ascertainable from existing records and visible condition.
19. The Approval holder must remove surface rubbish, dumped materials and anthropogenic debris identified in the joint pre-settlement schedule or visible upon reasonable inspection, and reinstate areas directly disturbed by that removal. This condition does not extend to buried material not identified in pre-settlement investigations.

Ecological Restoration Plan [ERP]

20. No later than 20 working days before settlement, the Approval holder must provide DOC with an Ecological Restoration Plan [ERP] prepared by a suitably qualified and experienced ecologist and certified by that ecologist as being consistent with these conditions.
21. The ERP must be prepared by a suitably qualified and experienced ecologist.
22. The purpose of the ERP is to:
 - a. reduce target species on the Northern Gully, Southern Gully, Firth Block and Dry Creek sites, including the wetlands, to a target of 90% eradication.
 - b. protect and improve the condition of indigenous vegetation on the sites;
 - c. successfully establish 200 swamp maire in the Southern Gully;
 - d. target 90% success rate of planted swamp maire so that at least 180 specimens survive after seven years;
 - e. achieve the standards in Table 1 for weed species;
 - f. achieve the standards in Table 2 for replanting of indigenous vegetations; and
 - g. target a 90% success rate for newly planted indigenous vegetation after five years (other than swamp maire which has a seven year timeframe).

To achieve this purpose, the ERP must include the following:

- h. Measures for how weed control will be undertaken on the sites. The target weed species are those listed in Table 1;
- i. Measures for managing the introduction of weed plant species to the sites;
- j. Identification of times of year to focus on particular weed control strategies;
- k. Methods for giving effect to the Greater Wellington Regional Pest Management Plan;
- l. A yearly report on the results of weed management will be provided to DOC.
- m. Baseline and ongoing monitoring of threatened plant populations and weed species at the sites;
- n. A planting plan for indigenous species including the timing of plantings;
- o. Adaptive management and restorative measures to ensure the survival of threatened plant populations on the sites.

Table 1. Weed management requirements

Location	Duration of management	Target objective
Northern Gully	5 years	90% eradication of the following weed species: • Old man's beard (<i>Clematis vitalba</i>) • Tradescantia

		No exotic canopy tree species.
Southern Gully	5 years	90% eradication of the following weed species: • Blackberry • Exotic vines • Pampas
Dry Creek	5 years	90% eradication of weed species • Exotic weeds • Broom • Gorse • Buddleia • Spanish heath • Old man's beard • Wattle • Tradescantia • Rama grass • Soft rush nasturtium • Creeping buttercup • Verbena • Ink weed • Pampas
Firth Block	5 years	90% eradication of weed species

Table 2: Ecological restoration requirements

Location	Indigenous species	Minimum area/ density / number of specimens	Timeframe and target success rate
Southern Gully	Swamp maire	200 individual plants to be planted when they reach at least PB3 size with a vegetative minimum height of 600mm (not including the bag). This is likely to be 2 years after propagation of seedlings.	90% success rate in the seventh year following planting on the site.
Dry Creek	A mixture of the following species all eco-sourced:	Replanting of 0.8 ha with indigenous species within three years.	90% success rate in the fifth year following planting.

	• Pigeonwood (<i>Hedycarya arborea</i>), • Ramarama (<i>Lophomyrtus bullata</i>), • Hebe (<i>Veronica stricta</i> var. <i>stricta</i>), • Kānuka (<i>Kunzea robusta</i>), • Five finger (<i>Pseudopanax arboreus</i>), • Wharangi (<i>Melicope ternate</i>), • Shining karamu (<i>Coprosma lucida</i>), • Thin leaved coprosma (<i>Coprosma areolate</i>), • Kanono (<i>Corprosma grandifolia</i>), • Karamū (<i>Coprosma robusta</i>)	Minimum 7,000 plants, of which at least 500 must be ramarama.	
Firth Block	Kāmahi (<i>Pterphylla racemosa</i>) Kānuka (<i>Kunzea robusta</i>)	Minimum of 1,000 of each species planted within 10 m of the quarry edge within one year The location must avoid the skink mitigation site that has previously established.	90% success rate in the fifth year following planting.

23. The ERP must be prepared in consultation with Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira. It may identify opportunities for mātauranga Māori, cultural engagement and restoration participation.
24. The Approval holder must provide a draft ERP to Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira for comment no later than 20 working days before finalising the

ERP. When providing the final ERP to DOC, the Approval holder must include any written comments received and a brief response schedule explaining how those comments were addressed. The Approval holder bears its own consultation costs and any reasonable, pre-agreed tangata whenua participation costs, but not DOC's internal review costs under this condition

Mammalian Pest Management Plan

25. No later than 20 working days before settlement, the Approval holder must provide DOC with a Mammalian Pest Management Plan certified by a suitably qualified and experienced ecologist or pest-management practitioner as being consistent with Conditions 26 to 28
26. The purpose of the Mammalian Pest Management Plan is to set out how mammalian pest control will be undertaken on the Northern Gully, Southern Gully, Firth Block and Dry Creek sites to support the ecological restoration outcomes required by these conditions.
27. The Mammalian Pest Management Plan must include:
 - a. the target pest species listed in Table 3;
 - b. the areas where pest management will be undertaken;
 - c. the control methods and timing of control;
 - d. monitoring methods for target pest species;
 - e. response actions where monitoring or contractor observations indicate that pest activity is materially reducing the effectiveness of restoration or natural regeneration; and
 - f. annual reporting to DOC.
28. The Mammalian Pest Management Plan may be amended where the amendment is certified by a suitably qualified and experienced ecologist or pest-management practitioner as improving practicality or effectiveness while remaining materially consistent with these conditions. The Approval holder must provide DOC with a copy of any certified amendment before it is implemented. A pest detection or increase in pest activity is not, of itself, a breach of these conditions, provided the Approval holder implements the relevant response actions in accordance with the Mammalian Pest Management Plan.

Table 3. Mammalian pest control management

Location	Pest species	Duration	Response trigger
Northern Gully	Possums	10 years	Contractor records observations indicate pest levels are materially reducing
Northern Gully	Goats		
Tawa-Kāmahī	Rats		
Northwestern Forest and			

Eastern Pukatea Forest			
Southern Gully	Possums	10 years	Contractor records observations indicate pest levels are materially reducing
Firth Block around the water body bordering the park, OBDA and Firth Block (Farm Pond)	Rodents	10 years	Contractor records observations indicate pest levels are materially reducing
All sites	Mustelids	10 years	Contractor records observations indicate pest levels are materially reducing

Proposed draft conditions (Cl.32 Sch.6)

To prepare the land for exchange the following conditions are imposed under schedule 6 clause 32:

29. The land being given by the Crown by way of exchange must be transferred to the Approval holder, without reservation, classification, interest or encumbrance.to allow for transfer from the Crown to the Approval Holder after Gazettal.
30. The Approval holder's land will be provided to the Crown free of all encumbrances and interests, except for the following interests that must remain in place. These must be specified in the exchange Gazette notice and brought down onto the new titles:
 - a. Open Space Covenant Pursuant to Section 22 of the QEII National Trust Act 1977 (Lot 1 DP60552 and Part Lot 1 DP22561 – Creating document 10476608.1).
 - b. Right of way over Part Lot 1 DP28205 (Creating Document 701267); and
 - c. Easement in Gross-Quarrying effects, shown on Lots 4, 5 and 100 DP 322126, burdened land Lots 4, 5 & 100 DP322126 (creating document 5835385.5).

Ecological restoration

31. The Approval Holder must undertake the anticipated activities in accordance with the certified ERP prepared in accordance with pre-conditions 21 to 24 above at all times.
32. The Approval holder may amend the ERP where the amendment is certified by a suitably qualified and experienced ecologist as improving practicality, efficacy or environmental fit while remaining materially consistent with these conditions. The Approval holder must give

DOC written notice of the amendment at least 10 working days before implementation. If DOC objects within that period and explains the inconsistency relied on, the amendment must not proceed until resolved.

33. The ERP may be amended by the Approval holder at any time, provided the amendments are:
 - a. for the purpose of improving the efficacy of the management of weeds;
 - b. for the purpose of providing for better planting and maintenance methodology(s). This may include substituting plant species if it is found that a more appropriate plant species is better suited to this environment, while achieving biodiversity enhancements;
 - c. for the purpose of applying best practicable measures;
 - d. consistent with the conditions of this approval; and
 - e. submitted in writing to DOC 10 days prior to any amendment being implemented.
34. Plants must be eco-sourced within the Wellington Ecological District and sourced from a reputable nursery able to provide provenance information on request.
35. Except where the ERP specifies a different and ecologically appropriate grade for a particular species or location, all plants must be healthy, not root-bound, and generally no smaller than PB2 at the time of planting.
36. Slow-release fertiliser may be used where recommended by the ecologist or nursery supplier for the relevant species and site conditions.
37. Weed-free mulch may be used where recommended by the ecologist for moisture retention and weed suppression, except in wetland areas or other locations where mulch is ecologically inappropriate.

Mammalian Pest Management

38. The Approval holder must implement the Mammalian Pest Management Plan during the periods stated in Table 3.
39. The Approval holder may amend the Mammalian Pest Management Plan where the amendment is certified by a suitably qualified and experienced ecologist as improving practicality or efficacy while remaining materially consistent with these conditions.
 - a. The Approval holder must give DOC written notice at least 10 working days before implementation.

If DOC objects within that period and explains the inconsistency relied on, the amendment must not proceed until resolved.

The Applicant must provide DOC with an annual report within 30 working days after each year of implementation. The report must summarise pest control undertaken, monitoring results, any threshold exceedances, and any response actions implemented.

Contaminated land

40. If, within 12 months after settlement, contamination (as defined in National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) is identified on the Approval holder's Land transferred to the Crown and that contamination:
- a. was caused by the activities of the Approval holder occurring before settlement;
 - b. was not disclosed in the pre-settlement contamination reports; and
 - c. exceeds the applicable standard for the actual or intended conservation and recreation use of the land under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 requiring management, then the Approval holder must, after receiving written notice, be given a reasonable opportunity to investigate and carry out any remediation or risk-management works.

Compliance is to the standard required by any remediation plan prepared by a suitably qualified contaminated land practitioner.

41. Before settlement, the Approval holder must undertake a targeted contaminated land investigation of the discrete area identified in the Northern Gully, including the deposited material in the stream bed and on the adjacent stream embankment.
42. The investigation must be undertaken by a suitably qualified contaminated land practitioner and must determine whether contamination associated with the area is present at concentrations requiring management or remediation having regard to:
- a. the applicable soil contaminant standards for the actual or intended conservation and recreation use of the land under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, where applicable;
 - b. where relevant, potential effects of such contamination on water, sediment or ecological receptors, the ANZG (2018) default guideline values or other applicable environmental guideline values;
 - c. If the investigation identifies contamination requiring management or remediation, the Approval holder must prepare and implement a remediation or risk-management plan certified by a suitably qualified contaminated land practitioner; and
 - d. Compliance with Conditions 44 and 45 is achieved when a suitably qualified contaminated land practitioner certifies that any contamination associated with the deposited area has been investigated and, where required, managed or remediated to the standard required for the actual or intended conservation and recreation use of the land detailed above.

Continuance of rights

43. The rights and obligations of the parties under this agreement continue beyond settlement of this agreement accordingly those rights and obligations will not merge in the settlement but will continue thereafter with full force and effect.

Appendix 7B: Conditions proposed by Applicant - Package B

Draft conditions proposed by Winstone in response to the Draft Report

This approval for land exchange is conditional until the Minister of Conservation is satisfied that Conditions 1 to 46 below (being pre-conditions imposed in accordance with clause 31 and conditions imposed in accordance with clause 32 of Schedule 6 of the Fast-Track Approvals Act 2024) are complied with.

Definitions:

Approval Holder: Means the authorised person for the purposes of the Schedule 2 listing, being Winstone Aggregates (A Division of Fletcher Concrete and Infrastructure Limited), or any successor approved in writing by the Minister, being the entity to whom approval is granted under these conditions.

Approval holders land: Means the land in the ownership or control of the Approval Holder that is subject to the Land exchange and identified as the parcels known as:

- Northern Gully: means the area of land comprising approximately 12.62 hectares being part of Lot 1 DP 60552 and Lot 5 DP322126, and as identified in approved plan [x]
- Southern Gully: means the area of land comprising approximately 3.94 hectares, being Lots 4 and 5 DP 32212, and as identified in approved plan [x]
- Firth Block: means the area of land comprising approximately 9.6 hectares, being part of Lot 1 DP 60552 and Part Lot 1 DP 22561, and as identified in approved plan [x] and
- Dry Creek: means the area of land comprising approximately 7.94 hectares being Part Lot 1 DP 28205, and as identified in approved plan [x]

DOC - Get: Means the land to be transferred from the Approval Holder to the Crown and administered by the Department of Conservation, comprising the Approval Holder's land and shown on approved plans x.

DOC - Give: Means the land currently owned by the Crown and administered as part of the Belmont Regional Park that is to be transferred to the Approval Holder, comprising approximately 23 hectares (more or less), as shown on the approved plans [X].

Crown Land: Means land owned by the Crown and held for conservation or reserve purposes, including land administered by or on behalf of the Department of Conservation under the Conservation Act 1987 and/or the Reserves Act 1977.

Conservation Improvements: Means the ecological restoration, pest management, weed control, planting, access, and associated works to be undertaken by the Approval Holder in accordance with the Improvements Package (including Package A and Package B) for the purposes of achieving and net conservation benefit.

The Minister: Means Minister for Conservation, or any person acting under delegated authority on behalf of the Minister, in accordance with the Conservation Act 1987 or the Reserves Act 1977.

Belmont Regional Park Improvement Area means the approximately 13 hectares (more or less) of land within Belmont Regional Park owned by the Department of Conservation and managed by Greater Wellington Regional Council adjacent to the DOC-Give area proposed for improvement planting, as shown on the approved plans [x].

Proposed Draft Pre-Conditions for land exchange

To prepare the land for exchange, the following pre-conditions are imposed under schedule 6, clause 31 and must be completed within 2 years of the date of approval:

1. The Approval holder must provide a draft survey plan to the Minister no less than 10 working days before submitting the final survey plan under condition 2. Any comments provided by the Minister within that period must relate only to the identification of the exchange boundaries and required transfer mechanics.
2. The Minister or the Minister's delegate must, acting reasonably, approve or reject the final survey plan within 10 working days of receipt. Any rejection must be accompanied by written reasons. If no response is given within that period, the plan is deemed approved.
3. The Approval holder shall obtain all consents and approvals required to separately define the Applicant's land and to enable ownership of that land to be transferred to the Crown. The Approval holder's land will be provided free of all encumbrances and interests, except for the following interests that must remain in place and be brought down onto the new titles:
 - a. Open Space Covenant Pursuant to Section 22 of the QEII National Trust Act 1977 (Lot 1 DP60552 and Part Lot 1 DP22561 – Creating document 10476608.1);
 - b. Right of way over Part Lot 1 DP28205 (Creating Document 701267); and
 - c. Easement in Gross – Quarrying effects, shown on Lots 4, 5 and 100 DP322126, burdened land Lots 4, 5 & 100 DP322126 (creating document 5835385.5).
4. The Crown and the Approval holder must each promptly do all things reasonably required to enable the Crown Land to be transferred to the Approval holder as fee simple land, free of encumbrances and without reserve classification on Gazettal. The Minister must not unreasonably withhold, delay or condition any approval or execution required for that purpose.

5. Before settlement, the Approval holder must install a fence approximately 60 metres in length and set back 6 metres from the Firth Block pit face in the location shown on Drawing W15069_Land_Exchange_Concept Boffa Miskell 1 December 2025, or as otherwise certified by a suitably qualified geotechnical engineer for equivalent safety outcomes. The design and location certification must be provided to the Minister before construction.

Encumbrances

6. The Approval holder will transfer its estate and interest in the Approval Holder's land to the Minister free from all leases and tenancies and discharges from all mortgages, charges and other encumbrances other than those listed in Condition 3.

Costs

7. For avoidance of doubt all reasonable costs associated with complying with Conditions 1 to 6 shall be met by the Approval holder.
8. The Approval holder must pay the Minister's reasonable costs and expenses of, and incidental to, preparing and signing the Exchange Agreement or any extension or variation of it, including surveying, conveyancing and legal costs.
9. The Approval holder must pay all reasonable costs associated with the Minister's work to give effect to the Exchange Agreement, calculated at DOC's standard cost-recovery rates current at the date the work is undertaken and invoiced within 3 months of the relevant work being completed.
10. The Approval holder must pay in full immediately and on demand all reasonable costs and fees (including solicitors' costs and fees of debt collecting agencies engaged by the Minister) arising out of and associated with steps taken by the Minister to enforce or attempt to enforce the Minister's rights and powers under the Exchange Agreement including the right to recover outstanding money owed to the Minister.

Easements

11. The Approval holder shall survey and register the appropriate easements as shown on Scheme Plan SC-02 (Appendix B10a), including but not limited to:
 - a. Easement Z (Right of Way) to be granted over part of Lot 9 for the benefit of Lot 10 (comprised in the DOC-Get Area) for the purpose of conservation activity and maintenance undertaken by DOC or its agents and public pedestrian access. DOC shall have the full and unrestricted right of access, including the right to enter, pass, and repass on foot or by vehicle or machinery, together with its employees and contractors, for the sole purpose of accessing adjoining conservation land for inspection and maintenance related to conservation purposes. Public pedestrian only access shall be permitted, subject to any reasonable temporary restrictions required

for public safety, ecological restoration works, pest or weed control, maintenance, fire risk, weather events, or quarry operational safety and may be reasonably determined and specified from time to time by the grantor. DOC shall have the right to carry out inspection, maintenance, repair, and improvement works on any tracks, roads, or structures within Easement Z as reasonably required for conservation purposes and managing public pedestrian access subject to standard terms regarding the suitable management of health and safety obligations and ensuring that the grantor has reasonable prior notice of the intended access and programme of works.

Bonds for Conservation Works

12. If the Land Exchange is approved, the Approval holder shall provide to the Minister, before giving effect to the exchange, a performance security ("Bond") for the purpose of ensuring completion of the "Conservation Improvement Works" defined below. The Bond shall:

(a) **Scope:** Secure the Approval holders timely performance of all identified Conservation Improvement Works on the land to be given, as specified in Conditions 13, 22, 27 and 28 (for example, weed clearance, native planting, fencing, and pest-management), but shall not cover any other obligations.

(b) **Amount:** Be in an amount equal to the reasonably estimated cost (as certified by an independent Quantity Surveyor or registered valuer or contractor) of completing the Works. The Bond amount shall be subject to audit and revaluation by mutual agreement (or by binding expert determination if disputed). In no case shall it exceed a specified cap \$200,000.

(c) **Form:** Be provided by way of a performance guarantee by a group company of the Approval holder which provides performance security, or (if preferred by the Approval holder) an unconditional bank guarantee or irrevocable performance bond from a NZ-registered bank or insurer reasonably acceptable to the Minister (alternatively, a cash deposit may be lodged).

(d) **Release Schedule:** The Bond shall be released in two stages:

- (i) fifty percent (50%) upon completion and acceptance of the specified Conservation Improvement Works by the Minister or the Minister's agent; and
- (ii) the remaining fifty percent (50%) at the close of the 24 month maintenance period following such completion, provided the land remains free of noxious weeds and meets agreed success standards. If all Conservation Improvement Works are completed to satisfaction before the expiry of 24 months, the second half may be released early.

(e) **Default and Call:** The Bond shall only be drawn upon if the Approval holder fails to complete the specified Conservation Improvement Works by the agreed deadlines (or maintain them during the maintenance period) after receiving written notice and a 30 working day cure period. Any call on the Bond shall be limited to the cost of completing or remedying

the Works, and the Applicant may dispute any call by written notice; unresolved disputes will be referred to arbitration in New Zealand under the Arbitration Act 1996 before funds are released.

Conservation Improvement Works means those specific enhancement works or restoration measures agreed by the parties and detailed in an annex to these conditions (for example, specified planting areas, pest-proof fences, access tracks, or restoration of riparian margins).

The Bond is a section 78 condition (Crown risk condition) and shall not be used as a penalty. The value of the Bond is expressly intended to cover only the cost of completing the above-defined Conservation Improvement Works.

Fencing

13. The Approval holder must construct, only that boundary fencing which is reasonably necessary to exclude persons, meet any existing covenant requirement, or address an identified safety risk on the external boundary of the land being transferred to the Crown. The required locations and fence standard must be identified in a pre-settlement fencing plan agreed by the parties, acting reasonably.

Rates

14. There shall be no apportionment of rates or other outgoings paid by the Parties.

Structure and improvements, condition of land

15. The land being acquired by the Approval holder, including any structures or improvements thereon, is transferred and accepted by the Approval holder on an “as is, where is” basis.
16. The Minister accepts no liability (financial or otherwise) in relation to any structure or other improvement on the land being acquired by the Approval holder, including for any remedial, removal, or maintenance costs associated with any structure or improvement.
17. The Approval holder must remove from the Approval holder’s Land only those structures, improvements or materials identified in a joint pre-settlement schedule prepared by the parties, no later than 20 working days before settlement. Reinstatement is limited to areas directly disturbed by that removal.
18. Any structure or improvement expressly agreed in writing to remain on the Approval holder’s land at settlement must, as at settlement, be safe for its intended use and lawful so far as reasonably ascertainable from existing records and visible condition.
19. The Approval holder must remove surface rubbish, dumped materials and anthropogenic debris identified in the joint pre-settlement schedule or visible upon reasonable inspection,

and reinstate areas directly disturbed by that removal. This condition does not extend to buried material not identified in pre-settlement investigations.

Ecological Restoration Plan [ERP]

20. No later than 20 working days before settlement, the Approval holder must provide DOC with an Ecological Restoration Plan [ERP] prepared by a suitably qualified and experienced ecologist and certified by that ecologist as being consistent with these conditions.
21. The ERP must be prepared by a suitably qualified and experienced ecologist.
22. The purpose of the ERP is to:
 - a. reduce target species on the Northern Gully, Southern Gully, Firth Block, Dry Creek sites and Belmont Regional Park areas [Limited to areas within 13ha adjacent to the DOC-give areas], including the wetlands, to a target of 90% eradication.
 - b. protect and improve the condition of indigenous vegetation on the sites;
 - c. successfully establish 200 swamp maire in the Southern Gully and 200 swamp maire in the Belmont Regional Park;
 - d. target 90% success rate of planted swamp maire so that at least 360 specimens survive after seven years;
 - e. achieve the standards in Table 1 for weed species;
 - f. achieve the standards in Table 2 for replanting of indigenous vegetations; and
 - g. target a 90% success rate for newly planted indigenous vegetation after five years (other than swamp maire which has a seven year timeframe).

To achieve this purpose, the ERP must include the following:

- h. Measures for how weed control will be undertaken on the sites. The target weed species are those listed in Table 1;
- i. Measures for managing the introduction of weed plant species to the sites;
- j. Identification of times of year to focus on particular weed control strategies;
- k. Methods for giving effect to the Greater Wellington Regional Pest Management Plan;
- l. aA yearly report on the results of weed management will be provided to DoC.
- m. Baseline and ongoing monitoring of threatened plant populations and weed species at the sites;
- n. A planting plan for indigenous species including the timing of plantings;
- o. Adaptive management and restorative measures to ensure the survival of threatened plan populations on the sites.

Table 1. Weed management requirements

Location	Duration of management	Target objective
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Northern Gully	5 years	90% eradication of the following weed species: • Old man's beard (<i>Clematis vitalba</i>) • Tradescantia No exotic canopy tree species.
Southern Gully	5 years	90% eradication of weed species • Blackberry • Exotic vines • Pampas
Dry Creek	5 years	90% eradication of weed species: • Exotic weeds • Broom • Gorse • Buddleia • Spanish heath • Old man's beard • Wattle • Tradescantia • Rama grass • Soft rush nasturtium • Creeping buttercup • Verbena • Ink weed • Pampas
Firth Block	5 years	90% eradication of weed species
Belmont Regional Park areas	5 years	90% eradication of weed species. Targeted weed control within Belmont Regional Park planting areas and their immediate surrounds to support establishment of swamp maire and associated indigenous planting.

Table 2: Ecological restoration requirements

Location	Indigenous species	Minimum area/ density / number of specimens	Timeframe and target success rate
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Southern Gully	Swamp maire	200 individual plants to be planted when they reach at least PB3 size with a vegetative minimum height of 600mm (not including the bag). This is likely to be 2 years after propagation of seedlings.	90% success rate in the seventh year following planting on the site.
Dry Creek	A mixture of the following species all eco-sourced: • Pigeonwood (<i>Hedycarya arborea</i>), • Ramarama (<i>Lophomyrtus bullata</i>), • Hebe (<i>Veronica stricta</i> var. <i>stricta</i>), • Kānuka (<i>Kunzea robusta</i>), • Five finger (<i>Pseudopanax arboreus</i>), • Wharangi (<i>Melicope ternate</i>), • Shining karamu (<i>Coprosma lucida</i>), • Thin leaved coprosma (<i>Coprosma areolate</i>), • Kanono (<i>Corprosma grandifolia</i>), • Karamū (<i>Coprosma robusta</i>)	Replanting of 0.8 ha with indigenous species within three years. Minimum 7,000 plants, of which at least 500 must be ramarama.	90% success rate in the fifth year following planting.

Firth Block	Kāmahi (<i>Pterphylla racemosa</i>) Kānuka (<i>Kunzea robusta</i>)	Minimum of 1,000 of each species planted within 10 m of the quarry edge within one year The location must avoid the skink mitigation site that was previously established.	90% success rate in the fifth year following planting.
Belmont Regional Park areas	Swamp maire Ramarama	200 individual plants of swamp maire to be planted when they reach at least PB3 size with a vegetative minimum height of 600mm (not including the bag). This is likely to be 2 years after propagation of seedlings. And 200 Ramarama	90% success rate in the seventh year following planting on the site.

23. The ERP must be prepared in consultation with Taranaki Whānui ki te Upoko o Te Ika, Te Rūnanga o Toa Rangatira and Greater Wellington Regional Council (Manager, Ecosystems & Community). It may identify opportunities for mātauranga Māori, cultural engagement and restoration participation.
24. The Approval holder must provide a draft ERP to Taranaki Whānui ki te Upoko o Te Ika, Te Rūnanga o Toa Rangatira and Greater Wellington Regional Council (Manager, Ecosystems & Community) for comment no later than 20 working days before finalising the ERP. When providing the final ERP to DOC, the Approval holder must include any written comments received and a brief response schedule explaining how those comments were addressed. The Approval holder bears its own consultation costs and any reasonable, pre-agreed tangata whenua and councils participation costs, but not DOC's internal review costs under this condition
25. The ERP and the MPMP must be prepared in consultation with Greater Wellington in its role as Manager of the Belmont Regional Park to ensure that any proposed methodology for restoration or pest control in Belmont Regional Park Improvement Area is undertaken in a manner that is consistent with Greater Wellington's management of the Regional Park.

Mammalian Pest Management Plan

26. No later than 20 working days before settlement, the Approval holder must provide DOC with a Mammalian Pest Management Plan certified by a suitably qualified and experienced ecologist or pest-management practitioner as being consistent with Conditions 26 to 28.
27. The purpose of the Mammalian Pest Management Plan is to set out how mammalian pest control will be undertaken on the Northern Gully, Southern Gully, Firth Block, Dry Creek sites and Belmont Regional Park to support the ecological restoration outcomes required by these conditions.
28. The Mammalian Pest Management Plan must include:
 - a. the target pest species listed in Table 3;
 - b. the areas where pest management will be undertaken;
 - c. the control methods and timing of control;
 - d. monitoring methods for target pest species;
 - e. response actions where monitoring or contractor observations indicate that pest activity is materially reducing the effectiveness of restoration or natural regeneration;
 - f. annual reporting to DOC; and
 - g. a description of how any Mammalian Pest control proposed in the Belmont Regional Park areas is consistent with the methodology used by Greater Wellington in the Regional Park.
29. The Mammalian Pest Management Plan may be amended where the amendment is certified by a suitably qualified and experienced ecologist or pest-management practitioner as improving practicality or effectiveness while remaining materially consistent with these conditions. The Approval holder must provide DOC with a copy of any certified amendment before it is implemented. A pest detection or increase in pest activity is not, of itself, a breach of these conditions, provided the Approval holder implements the relevant response actions in accordance with the Mammalian Pest Management Plan.

Table 3. Mammalian pest control management

Location	Pest species	Duration	Response trigger
Northern Gully Northern Gully Tawa-Kāmahi Northwestern Forest and Eastern Pukatea Forest	Possums Goats Rats	10 years	Contractor records observations indicate pest levels are materially reducing
Southern Gully	Possums	10 years	Contractor records observations indicate pest

			levels are materially reducing
Firth Block around the water body bordering the park, OBDA and Firth Block (Farm Pond)	Rodents	10 years	Contractor records observations indicate pest levels are materially reducing
All sites	Mustelids	10 years	Contractor records observations indicate pest levels are materially reducing
Regional Park areas	Possums	10 years	Contractor records observations indicate pest levels are materially reducing

Proposed draft conditions (Cl.32 Sch.6)

To prepare the land for exchange the following conditions are imposed under schedule 6 clause 32:

30. The land being given by the Crown by way of exchange must be subject to no reservation, classification, interest or encumbrance. And must be transferred from the Crown to the Approval Holder after Gazettal.
31. The Approval holder's land will be provided to the Crown free of all encumbrances and interests, except for the following interests that must remain in place. These must be specified in the exchange Gazette notice and brought down onto the new titles:
 - a. Open Space Covenant Pursuant to Section 22 of the QEII National Trust Act 1977 (Lot 1 DP60552 and Part Lot 1 DP22561 – Creating document 10476608.1).
 - b. Right of way over Part Lot 1 DP28205 (Creating Document 701267); and
 - c. Easement in Gross-Quarrying effects, shown on Lots 4, 5 and 100 DP 322126, burdened land Lots 4, 5 & 100 DP322126 (creating document 5835385.5).

Ecological restoration

32. The Approval Holder must undertake the anticipated activities in accordance with the certified ERP prepared in accordance with pre-conditions 20 to 23 above at all times.
33. The Approval holder may amend the ERP where the amendment is certified by a suitably qualified and experienced ecologist as improving practicality, efficacy or environmental fit while remaining materially consistent with these conditions. The Approval holder must give

DOC written notice of the amendment at least 10 working days before implementation. If DOC objects within that period and explains the inconsistency relied on, the amendment must not proceed until resolved.

34. The ERP may be amended by the Approval holder at any time, provided the amendments are:
 - a. for the purpose of improving the efficacy of the management of weeds;
 - b. for the purpose of providing for better planting and maintenance methodology(s). This may include substituting plant species if it is found that a more appropriate plant species is better suited to this environment, while achieving biodiversity enhancements;
 - c. for the purpose of applying best practicable measures;
 - d. consistent with the conditions of this approval; and
 - e. submitted in writing to DOC 10 days prior to any amendment being implemented.
35. Plants must be eco-sourced within the Wellington Ecological District and sourced from a reputable nursery able to provide provenance information on request.
36. Except where the ERP specifies a different and ecologically appropriate grade for a particular species or location, all plants must be healthy, not root-bound, and generally no smaller than PB2 at the time of planting.
37. Slow-release fertiliser may be used where recommended by the ecologist or nursery supplier for the relevant species and site conditions.
38. Weed-free mulch may be used where recommended by the ecologist for moisture retention and weed suppression, except in wetland areas or other locations where mulch is ecologically inappropriate.

Mammalian Pest Management

39. The Approval holder must implement the Mammalian Pest Management Plan during the periods stated in Table 3.
40. The Approval holder may amend the Mammalian Pest Management Plan where the amendment is certified by a suitably qualified and experienced ecologist as improving practicality or efficacy while remaining materially consistent with these conditions.
 - a. The Approval holder must give DOC written notice at least 10 working days before implementation.
 - b. If DOC objects within that period and explains the inconsistency relied on, the amendment must not proceed until resolved
41. The Approval holder must undertake monitoring of mammalian pest management in accordance with the Mammalian Pest Management Plan using a trigger or calendar-based approach, and must:

- a. Undertake monitoring for each target species using methods as deemed appropriate by a suitably qualified and experienced ecologist;
 - b. Reasonably demonstrate that controls measures are effectively reducing pest populations over calendar year, Approval Holder must implement additional pest control in accordance with the Mammalian Pest Management Plan, as specified by the suitably qualified ecological and monitor the outcomes of any additional control.
42. The Applicant must provide DOC with an annual report within 30 working days after each year of implementation. The report must summarise pest control undertaken, monitoring results, any threshold exceedances, and any response actions implemented.

Contaminated land

43. If, within 12 months after settlement, contamination (as defined in National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) is identified on the Approval holder's Land transferred to the Crown and that contamination:
- a. was caused by the activities of the Approval holder occurring before settlement;
 - b. was not disclosed in the pre-settlement contamination reports; and
 - c. exceeds the applicable standard for the actual or intended conservation and recreation use of the land under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 requiring management, then the Approval holder must, after receiving written notice, be given a reasonable opportunity to investigate and carry out any remediation or risk-management works.

Compliance is to the standard required by any remediation plan prepared by a suitably qualified contaminated land practitioner.

44. Before settlement, the Applicant must undertake a targeted contaminated land investigation of the discrete area identified in the Northern Gully, including the deposited material in the stream bed and on the adjacent stream embankment.
45. The investigation must be undertaken by a suitably qualified contaminated land practitioner and must determine whether contamination associated with the area is present at concentrations requiring management or remediation having regard to:
- a. the applicable soil contaminant standards for the actual or intended conservation and recreation use of the land under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, where applicable;
 - b. where relevant to potential effects on water, sediment or ecological receptors, the ANZG (2018) default guideline values or other applicable environmental guideline values.

- c. If the investigation identifies contamination requiring management or remediation, the Applicant must prepare and implement a remediation or risk-management plan certified by a suitably qualified contaminated land practitioner; and
- d. Compliance with Conditions 44 to 46 is achieved when a suitably qualified contaminated land practitioner certifies that any contamination associated with the deposited area has been investigated and, where required, managed or remediated to the standard required for the actual or intended conservation and recreation use of the land detailed above.

Continuance of rights

- 46. The rights and obligations of the parties under this agreement continue beyond settlement of this agreement accordingly those rights and obligations will not merge in the settlement but will continue thereafter with full force and effect.

Appendix 8A – DOC's Recommended Amendments to Conditions Package A (clean)

Package A

This approval for land exchange is conditional until the Minister of Conservation is satisfied that Conditions 1 to 8 below (being pre-conditions imposed in accordance with clause 31 of Schedule 6, and is subject to the conditions imposed in accordance with clauses 32 and 33 of Schedule 6 of the Fast-Track Approvals Act 2024) are complied with.

Definitions:

Approval Holder Means the authorised person for the purposes of the Schedule 2 listing, being Winstone Aggregates (A Division of Fletcher Concrete and Infrastructure Limited), or any successor approved in writing by the Minister, being the entity to whom approval is granted under these conditions.

Approval holder's land: Means the land in the ownership or control of the Approval Holder that is subject to the Land exchange and identified as the parcels known as:

- Northern Gully: means the area of land comprising approximately 12.62 hectares being part of Lot 1 DP 60552 and Lot 5 DP322126, and as identified in approved plan [X]
- Southern Gully: means the area of land comprising approximately 3.94 hectares, being Lots 4 and 5 DP 32212, and as identified in approved plan [X]
- Firth Block: means the area of land comprising approximately 9.6 hectares, being part of Lot 1 DP 60552 and Part Lot 1 DP 22561, and as identified in approved plan [X] and
- Dry Creek: means the area of land comprising approximately 7.94 hectares being Part Lot 1 DP 28205, and as identified in approved plan [X]

DOC – Get: Means the land to be transferred from the Approval Holder to the Crown and administered by the Department of Conservation, comprising the Approval Holder's land and shown on approved plans [X].

DOC – Give: Means the land currently owned by the Crown and administered as part of the Belmont Regional Park that is to be transferred to the Approval Holder, comprising approximately 23 hectares (more or less), as shown on the approved plans [X].

Crown Land: Means land owned by the Crown and held for conservation or reserve purposes, including land administered by or on behalf of the Department of Conservation under the Conservation Act 1987 and/or the Reserves Act 1977.

The Minister: Means Minister for Conservation, or any person acting under delegated authority on behalf of the Minister, in accordance with the Conservation Act 1987 or the Reserves Act 1977.

Conservation Improvement Works means the works required to be undertaken in accordance with the minimum targets and timeframes set out in Tables 1, 2 and 3, and the fencing, removal of rubbish, and any other works required under these conditions the Approval holder is required to undertake at its cost.

Proposed Draft Pre-Conditions for land exchange

To prepare the land for exchange, the following pre-conditions are imposed under schedule 6, clause 31 and must be completed within 2 years of the date of approval:

1. The Approval holder must provide a draft survey plan to the Minister no less than 20 working days before submitting the final survey plan under condition 2.
2. The Approval holder must provide to the Minister a final survey plan. The Minister or the Minister's delegate will make best endeavours, to approve or reject the final survey plan within 20 working days of receipt. Any rejection must be accompanied by written reasons.
3. The Approval holder shall obtain all consents and approvals required to separately define the Approval Holder's land and to enable ownership of that land to be transferred to the Crown.
4. The Approval holder's land will be provided free of all encumbrances and interests, except for the following interests that must remain in place and be brought down onto the new titles:
 - (a) Open Space Covenant Pursuant to Section 22 of the QEII National Trust Act 1977 (Lot 1 DP60552 and Part Lot 1 DP22561 – Creating document 10476608.1);
 - (b) Right of way over Part Lot 1 DP28205 (Creating Document 701267); and
 - (c) Easement in Gross – Quarrying effects, shown on Lots 4, 5 and 100 DP322126, burdened land Lots 4, 5 & 100 DP322126 (creating document 5835385.5).
5. The Approval holder shall obtain all consents and approvals required to separately define the DOC-Give land and to enable ownership of the DOC-Give land to be transferred to the Approval holder as fee simple land.

Encumbrances

6. The Approval holder will transfer its estate and interest in the Approval Holder's land to the Minister free from all leases and tenancies and discharges from all mortgages, charges and other encumbrances other than those listed in Condition 4. *[imposed under s78]*

Easements

7. The Approval holder shall survey and register the appropriate easements as shown on Scheme Plan SC-02 (Appendix B10a), including but not limited to:

- (a) Easement Z (Right of Way) to be granted over part of Lot 9 for the benefit of Lot 10 (comprised in the DOC-Get Area) for the purpose of conservation activity and maintenance undertaken by DOC or its agents and public pedestrian access. DOC shall have the full and unrestricted right of access, including the right to enter, pass, and repass on foot or by vehicle or machinery, together with its employees and contractors, for the sole purpose of accessing adjoining conservation land for inspection and maintenance related to conservation purposes. Public pedestrian only access shall be permitted, subject to any reasonable temporary restrictions required for public safety, ecological restoration works, pest or weed control, maintenance, fire risk, weather events, or quarry operational safety and may be reasonably determined and specified from time to time by the grantor. DOC shall have the right to carry out inspection, maintenance, repair, and improvement works on any tracks, roads, or structures within Easement Z as reasonably required for conservation purposes and managing public pedestrian access subject to standard terms regarding the suitable management of health and safety obligations and ensuring that the grantor has reasonable prior notice of the intended access and programme of works.

Costs

8. For avoidance of doubt all costs associated with complying with Conditions 1 to 7 shall be met by the Approval holder.

Proposed draft conditions (Cl.32 Sch.6)

To prepare the land for exchange the following conditions are imposed under schedule 6 clause 32:

9. The land being given by the Crown by way of exchange must be transferred to the Approval holder, without reservation, classification, interest or encumbrance- to allow for transfer from the Crown to the Approval Holder after Gazettal.

Costs

10. The Approval holder must pay the Minister's costs and expenses of, and incidental to, preparing and signing the Exchange Agreement or any extension or variation of it, including surveying, conveyancing and legal costs. *[imposed under s78]*
11. The Approval holder must pay to the Minister all costs associated with the Minister's work to give effect to the Exchange Agreement, determined at the standard rates then applying in the Department of Conservation for cost recovery.*[imposed under s78]*
12. The Approval holder must pay in full immediately and on demand all costs and fees (including solicitors' costs and fees of debt collecting agencies engaged by the Minister) arising out of and associated with steps taken by the Minister to enforce or attempt to enforce the Minister's rights and powers under the

Exchange Agreement including the right to recover outstanding money owed to the Minister. *[imposed under s78]*

Bonds for Conservation Works

13. The Approval holder shall provide to the Minister, before giving effect to the exchange, a performance security either in cash or as a surety bond from a trading bank, insurance company or bond guarantor, a bond set in accordance with Condition 13(b).

The Bond shall:

- (a) **Scope:** Secure the Approval holders timely performance of all identified Conservation Improvement Works on the land to be given.
- (b) **Amount:** Be in an amount equal to the reasonably estimated cost (as certified by an independent Quantity Surveyor or registered valuer or contractor) of completing the Works. The Bond amount shall be subject to audit and revaluation by mutual agreement (or by binding expert determination if disputed).
- (c) **Form:** Be provided by way of a performance guarantee by a group company of the Approval holder which provides performance security, or (if preferred by the Approval holder) an unconditional bank guarantee or irrevocable performance bond from a NZ-registered bank or insurer reasonably acceptable to the Minister (alternatively, a cash deposit may be lodged).
- (d) **Release Schedule:** The Bond shall be released in two stages:
 - (i) fifty percent (50%) upon Condition and acceptance-by the Minister or the Minister's agent after seven years, and the Minister (or his agent) being satisfied that all other components of the Conservation Improvement Works have been completed in accordance with the conditions; and
 - (ii) the remaining fifty percent (50%) at the close of the ten year maintenance period following such completion, provided the land remains free of noxious weeds and meets the minimum standards set out in Table 1, 2 and 3.

- 14(a) If the Approval holder breaches or fails to carry out the Conservation Improvement Works, or in carrying out the Activities there arise adverse effects not authorised or reasonably foreseen, the Minister may call on the bond or any portion of it to ensure the Conservation Improvement Works are completed in accordance with the conditions and/or to remedy or mitigate those adverse effects.

- 14(b) The Bond shall only be drawn upon if the Approval holder fails to complete the Conservation Improvement Works including by the deadlines set out in Tables 1, 2 and 3 (or maintain them during the maintenance period) after receiving written notice and a 30 working day cure period. Any call on the Bond shall be limited to the cost of completing or remedying the Works, and the Applicant may dispute any call by written notice; unresolved disputes will be referred to arbitration in New Zealand under the Arbitration Act 1996 before funds are released.

Fencing

15. The Approval holder must, at its cost, construct, all boundary fencing which is reasonably necessary to exclude persons, meet any existing covenant requirement, keep stock out or address an identified safety risk on the external boundary of the land being transferred to the Crown. The required locations and fence standard must be identified in a pre-settlement fencing plan agreed by the parties.
16. The Approval holder must install the western boundary fence of the Firth Block so that it is set back at least 6 metres from the edge of any earth-worked areas on the adjacent Belmont Quarry as shown as shown in Figure 5-3 in the Baseline Geotechnical Limited Geotechnical Appraisal Report 2025 (Appendix B12 to the Land Exchange Application) (Geotechnical Report), or as otherwise determined by an independent suitably qualified geotechnical engineer as being suitable to address the instability issues at the quarry face to the west of the Firth Block described in the Geotechnical Report. Any report by an independent suitably qualified geotechnical engineer shall be provided to DOC, and the location, and design must be provided to the Minister for approval before construction. The setback area shall be clearly marked as conservation land and entry to the setback area shall be clearly marked as being "Entry Prohibited".

Biosecurity Act

17. The Approval holder will at its cost ensure that the land to be transferred to the Minister is compliant with any applicable "good neighbour" rules under the Biosecurity Act to the Minister's satisfaction prior to the Settlement Date. *[imposed under s78]*

Rates

18. There shall be no apportionment of rates or other outgoings paid by the Parties. *[imposed under s78]*

Structure and improvements, condition of land

19. The land being acquired by the Approval holder, including any structures or improvements thereon, is transferred and accepted by the Approval holder on an "as is, where is" basis. *[imposed under s78]*
20. The Minister accepts no liability (financial or otherwise) in relation to any structure or other improvement on the land being acquired by the Approval holder, including for any remedial, removal, or maintenance costs associated with any structure or improvement. *[imposed under s78]*
21. Unless otherwise instructed by the Minister, the Applicant will at its cost remove any structures and improvements from the land to be transferred to the Minister and will reinstate any land impacted by removal works. *[imposed under s78]*
22. The Applicant will, at its cost, ensure that any structures and improvements remaining on the land to be transferred to the Minister are safe and lawful. *[imposed under s78]*
23. The Approval holder must at its own cost remove all rubbish from the land to be transferred and will reinstate any land impacted by removal works.

24. The Approval holder will take all steps reasonably necessary, at its own cost, to ensure that the stability of the Firth Block will not be undermined by the quarry activity. Any instability issues that arise must be immediately remediated by the Approval holder at its own cost.

Rights of first refusal

25. The Approval holder confirms that any rights of first refusal or similar obligations that may otherwise be triggered by this land exchange have been waived. *[imposed under s78]*

Ecological Restoration Plan [ERP]

26. No later than 30 working days before settlement, the Approval holder must provide to DOC for its approval an Ecological Restoration Plan [ERP]. The approval is to confirm that the Ecological Restoration Plan provides the means to achieve the purpose and addresses the matters set out in Condition 28.
27. The ERP must be prepared by a suitably qualified and experienced ecologist.
28. The purpose of the ERP is to set out the methods the Approval Holder will implement to:
- (a) reduce weed species listed in Table 1 on the Northern Gully, Southern Gully, Firth Block and Dry Creek sites, including the wetlands, to a minimum target of 90% eradication.
 - (b) protect and improve the condition of indigenous vegetation on the sites;
 - (c) successfully establish 200 swamp maire in the Southern Gully;
 - (d) achieve 90% success rate of planted swamp maire so that at least 180 specimens survive after seven years;
 - (e) achieve the standards in Table 1 for weed species;
 - (f) achieve the standards in Table 2 for replanting of indigenous vegetation; and
 - (g) achieve a minimum 90% success rate for newly planted indigenous vegetation after five years (other than swamp maire which has a seven year timeframe).

To achieve this purpose, the ERP must include the following:

- (h) Measures for how weed control will be undertaken on the sites. The target weed species are listed in Table 1;
- (i) Measures for managing the introduction of weed plant species to the sites;
- (j) Identification of times of year to focus on particular weed control strategies;
- (k) Methods for giving effect to the Greater Wellington Regional Pest Management Plan;
- (l) A yearly report on the results of weed management will be provided to DOC.
- (m) Baseline and ongoing monitoring of threatened plant populations and weed species at the sites;
- (n) A planting plan for indigenous species including the timing of plantings;
- (o) Adaptive management and restorative measures to ensure the survival of threatened plant populations on the sites; and

- (p) Methods for protecting the wetland areas and the vulnerable roots of the new plantings of swamp maire and other species from visitors to the Southern Gully.

Table 1. Weed management requirements

Location	Duration of management	Minimum requirement
Northern Gully	10 years	90% eradication of the following weed species: • Old man's beard (<i>Clematis vitalba</i>) • Tradescantia No exotic canopy tree species.
Southern Gully	10 years	90% eradication of the following weed species: • Blackberry • Exotic vines • Pampas
Dry Creek	10 years	90% eradication of weed species • Exotic weeds • Broom • Gorse • Buddleia • Spanish heath • Old man's beard • Wattle • Tradescantia • Rama grass • Soft rush nasturtium • Creeping buttercup • Verbena • Ink weed • Pampas
Firth Block	10 years	90% eradication of weed species

Table 2: Ecological restoration requirements

Location	Indigenous species	Minimum area/ density / number of specimens	Timeframe and minimum success rate
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Southern Gully	Swamp maire	200 individual plants to be planted when they reach at least PB3 size with a vegetative minimum height of 600mm (not including the bag). This is likely to be 2 years after propagation of eco-sourced seedlings.	90% success rate in the seventh year following planting on the site.
Dry Creek	A mixture of the following species all eco-sourced: • Pigeonwood (<i>Hedycarya arborea</i>), • Ramarama (<i>Lophomyrtus bullata</i>), • Hebe (<i>Veronica stricta</i> var. <i>stricta</i>), • Kānuka (<i>Kunzea robusta</i>), • Five finger (<i>Pseudopanax arboreus</i>), • Wharangi (<i>Melicope ternate</i>), • Shining karamu (<i>Coprosma lucida</i>), • Thin leaved coprosma (<i>Coprosma areolate</i>), • Kanono (<i>Corprosma grandifolia</i>), • Karamū (<i>Coprosma robusta</i>)	Replanting of 0.8 ha with indigenous species within three years. Minimum 7,000 plants, of which at least 500 must be ramarama.	90% success rate in the fifth year following planting.
Firth Block	Kāmahi (<i>Pterphylla racemosa</i>) Kānuka (<i>Kunzea robusta</i>)	Minimum of 1,000 of each species planted within 10 m of the quarry edge within one year	90% success rate in the fifth year following planting.

		The location must avoid the skink mitigation site that has previously established.	
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29. The ERP must be prepared in consultation with Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira. It may identify opportunities for mātauranga Māori, cultural engagement and restoration participation.
30. The Approval holder must provide a draft ERP to Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira for comment no later than 20 working days before submitting the ERP to DOC for approval. When providing the final ERP to DOC, the Approval holder must include any written comments received and a response schedule explaining how those comments were addressed. The Approval holder bears its own consultation costs and all reasonable costs of DOC, Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira performing their roles in Condition 26 and 29 respectively.
31. The Approval Holder must undertake the anticipated activities in accordance with the approved ERP prepared in accordance with conditions 26 to 30 above at all times.
32. The ERP may be amended by the Approval holder at any time, provided the amendments are:
 - (a) for the purpose of improving the efficacy of the management of weeds;
 - (b) for the purpose of providing for better planting and maintenance methodology(s). This may include substituting plant species if it is found that a more appropriate plant species is better suited to this environment, while achieving biodiversity enhancements;
 - (c) for the purpose of applying best practicable measures;
 - (d) consistent with the conditions of this approval; and
 - (e) submitted in writing to DOC for its approval prior to any amendment being implemented.
33. The Applicant must provide DOC with an annual report within 30 working days after each year of implementation of the ERP. The first annual report will be due 12 months after approval of the ERP. The report must summarise planting undertaken, weed management, monitoring results for weeds and restoration planting, any target exceedances for weeds and/or any ecological restoration minimum success rates that have not been achieved (Tables 1 and 2), and any response actions implemented.
34. Plants must be eco-sourced within the Wellington Ecological District and sourced from a reputable nursery able to provide provenance information on request.

35. All plants must be healthy, not root-bound, be in PB3s or equivalent at the time of planting and weed free.
36. Slow-release fertiliser must be used at the rate recommended by the manufacturer with every plant, at the time of planting.
37. Weed-free mulch must be used for moisture retention and weed suppression, except in wetland areas where mulch is ecologically inappropriate.

Mammalian Pest Management Plan

38. No later than 30 working days before settlement, the Approval holder must provide to DOC for its approval a Mammalian Pest Management Plan. The approval is to confirm that the Mammalian Pest Management Plan provides the means to achieve the purpose and addresses the matters set out in Condition 27.
39. The Mammalian Pest Management Plan must be prepared by a suitably qualified and experienced ecologist.
40. The purpose of the Mammalian Pest Management Plan is to set out how mammalian pest control will be undertaken on the Northern Gully, Southern Gully, Firth Block and Dry Creek sites and achieve the minimum levels in Table 3 below.

The Mammalian Pest Management Plan must include:

- (a) the areas where pest management will be undertaken;
- (b) the control methods and timing of control;
- (c) monitoring methods for pest species set out in Table 3;
- (d) response actions where monitoring indicates that pest activity is not achieving the targets in Table 3; and
- (e) annual reporting to DOC.

Table 3. Mammalian pest control management

Location	Pest species	Duration	Targets
Northern Gully	Possums	10 years	<1 possum / camera / week
Northern Gully	Goats		< 1 goat contact per 3 hunter days (8 hour days) measured over a year of hunting
Tawa-Kāmahi	Rats		< 3 rats / camera / week (measured 3 x per year – February, May and November)
Northwestern Forest and Eastern Pukate Forest			

Southern Gully	Possums	10 years	<1 possum / camera / week (measured 1x per year)
Firth Block around the water body bordering the park, DOC-Give and Firth Block (Farm Pond)	Rodents	10 years	< 3 rats / camera / week (measured 3 x per year – February, May and November) < 3 mice/camera/week (3 x seasonally per year)
All sites	Mustelids	10 years	< 2 mustelids/ camera/week (3 x per year – February, May, November)

41. The Approval holder must undertake all activities in accordance with the approved Mammalian Pest Management Plan at all times.
42. The Mammalian Pest Management Plan may be amended where the amendment is–improving practicality or effectiveness. The Approval holder must submit the amended Mammalian Pest Management Plan in writing to DOC for approval, prior to any amendment being implemented.
43. The Approval holder may amend the Mammalian Pest Management Plan at any time, provided the amendments are submitted in writing to DOC for approval, prior to any amendment being implemented.
44. The Approval holder must provide DOC with an annual report within 30 working days after each year of implementation of the Mammalian Pest Management Plan. The first annual report will be due 12 months after approval of the Mammalian Pest Management Plan. The report must summarise pest control undertaken, monitoring results, any target exceedances, and any response actions implemented.

Contaminated land

45. If, within 12 months of the Settlement Date, the land being received by the Minister is found to be contaminated with a previously undisclosed organic or inorganic substance that poses a risk to public health or to the environment, the Applicant will immediately remedy the situation to the satisfaction of the Minister. *[imposed under s78]*
46. Before settlement, the Approval holder must undertake a contaminated land investigation of the Northern Gully, including the deposited material in the stream bed and on the adjacent stream embankment.

47. The investigation must be undertaken by a suitably qualified contaminated land practitioner and must determine whether contamination associated with the area is present at concentrations requiring management or remediation having regard to:
- (a) the applicable soil contaminant standards for the actual or intended conservation and recreation use of the land under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, where applicable;
 - (b) where relevant, potential effects of such contamination on water, sediment or ecological receptors, the ANZG (2018) default guideline values or other applicable environmental guideline values.
- 48(a). If the investigation in Condition 46 identifies contamination requiring management or remediation, the Approval holder must prepare and implement a remediation plan certified by a suitably qualified contaminated land practitioner.
- 48(b) Compliance with Condition 48(a) is achieved when a suitably qualified contaminated land practitioner certifies that any contamination associated with the deposited area has been investigated and, where required, remediated to the standard required for the actual or intended conservation and recreation use of the land detailed above.

Continuance of rights

49. The rights and obligations of the parties under this agreement continue beyond settlement of this agreement accordingly those rights and obligations will not merge in the settlement but will continue thereafter with full force and effect. *[imposed under s78]*

Signage

50. The Approval holder must construct and install signage in accordance with DOC's sign standards indicating the reserve name at the Approval holder's cost. These shall be placed in the following locations to make the public aware of ownership and right of access:
- (a) At the boundary of the Southern Gully Block facing Liverton Road;
 - (b) On the Hebden Crescent frontages of the Firth and Dry Creek Blocks; and
 - (c) On the existing easement on the Dry Creek Loop Track within the Dry Creek Block.

Appendix 8B – DOC's Recommended Amendments to Conditions Package A (tracked)

Package A

Key:

~~Strikethrough~~ indicates deletions proposed by DOC

Underlining indicates additional text proposed by DOC

This approval for land exchange is conditional until the Minister of Conservation is satisfied that Conditions 1 to ~~46~~ 8 below (being pre-conditions imposed in accordance with clause 31 of Schedule 6, and is subject to the conditions imposed in accordance with clauses ~~32~~ and 33 of Schedule 6 of the Fast-Track Approvals Act 2024) are complied with.

Definitions:

Approval Holder Means the authorised person for the purposes of the Schedule 2 listing, being Winstone Aggregates (A Division of Fletcher Concrete and Infrastructure Limited), or any successor approved in writing by the Minister, being the entity to whom approval is granted under these conditions.

Approval holder's land: Means the land in the ownership or control of the Approval Holder that is subject to the Land exchange and identified as the parcels known as:

- Northern Gully: means the area of land comprising approximately 12.62 hectares being part of Lot 1 DP 60552 and Lot 5 DP322126, and as identified in approved plan [X]
- Southern Gully: means the area of land comprising approximately 3.94 hectares, being Lots 4 and 5 DP 32212, and as identified in approved plan [X]
- Firth Block: means the area of land comprising approximately 9.6 hectares, being part of Lot 1 DP 60552 and Part Lot 1 DP 22561, and as identified in approved plan [X] and
- Dry Creek: means the area of land comprising approximately 7.94 hectares being Part Lot 1 DP 28205, and as identified in approved plan [X]

DOC – Get: Means the land to be transferred from the Approval Holder to the Crown and administered by the Department of Conservation, comprising the Approval Holder's land and shown on approved plans [X].

DOC – Give: Means the land currently owned by the Crown and administered as part of the Belmont Regional Park that is to be transferred to the Approval Holder, comprising approximately 23 hectares (more or less), as shown on the approved plans [X].

Crown Land: Means land owned by the Crown and held for conservation or reserve purposes, including land administered by or on behalf of the Department of Conservation under the Conservation Act 1987 and/or the Reserves Act 1977.

The Minister: Means Minister for Conservation, or any person acting under delegated authority on behalf of the Minister, in accordance with the Conservation Act 1987 or the Reserves Act 1977.

Conservation Improvement Works means the works required to be undertaken in accordance with the minimum targets and timeframes set out in Tables 1, 2 and 3, and the fencing, removal of rubbish, and any other works required under these conditions the Approval holder is required to undertake at its cost.

Proposed Draft Pre-Conditions for land exchange

To prepare the land for exchange, the following pre-conditions are imposed under schedule 6, clause 31 and must be completed within 2 years of the date of approval:

1. The Approval holder must provide a draft survey plan to the Minister no less than ~~40~~ 20 working days before submitting the final survey plan under condition 2. ~~Any comments provided by the Minister within that period must relate only to the identification of the exchange boundaries and required transfer mechanics.~~
2. The Approval holder must provide to the Minister a final survey plan. The Minister or the Minister's delegate will make best endeavours, ~~acting reasonably~~, to approve or reject the final survey plan within ~~40~~ 20 working days of receipt. Any rejection must be accompanied by written reasons. ~~If no response is given within that period, the plan is deemed approved.~~
3. The Approval holder shall obtain all consents and approvals required to separately define the ~~Applicant's~~ Approval Holder's land and to enable ownership of that land to be transferred to the Crown.
4. The Approval holder's land will be provided free of all encumbrances and interests, except for the following interests that must remain in place and be brought down onto the new titles:
 - a. Open Space Covenant Pursuant to Section 22 of the QEII National Trust Act 1977 (Lot 1 DP60552 and Part Lot 1 DP22561 – Creating document 10476608.1);
 - b. Right of way over Part Lot 1 DP28205 (Creating Document 701267); and
 - c. Easement in Gross – Quarrying effects, shown on Lots 4, 5 and 100 DP322126, burdened land Lots 4, 5 & 100 DP322126 (creating document 5835385.5).
- ~~4.5.- The Crown and the Approval holder must each promptly do all things reasonably required to enable the Crown Land to be transferred to the Approval holder as fee simple land, free of encumbrances and without reserve classification on Gazettal. The Minister must not unreasonably withhold, delay or condition any approval or execution required for that purpose. The Approval holder shall obtain all~~

consents and approvals required to separately define the DOC-Give land and to enable ownership of the DOC-Give land to be transferred to the Approval holder as fee simple land.

30. ~~The Approval holder's land will be provided to the Crown free of all encumbrances and interests, except for the following interests that must remain in place. These must be specified in the exchange Gazette notice and brought down onto the new titles:~~
- ~~a. Open Space Covenant Pursuant to Section 22 of the QEII National Trust Act 1977 (Lot 1 DP60552 and Part Lot 1 DP22561—Creating document 10476608.1).~~
 - ~~b. Right of way over Part Lot 1 DP28205 (Creating Document 701267); and~~
 - ~~c. Easement in Gross Quarrying effects, shown on Lots 4, 5 and 100 DP 322126, burdened land Lots 4, 5 & 100 DP322126 (creating document 5835385.5).~~

Encumbrances

6. The Approval holder will transfer its estate and interest in the Approval Holder's land to the Minister free from all leases and tenancies and discharges from all mortgages, charges and other encumbrances other than those listed in Condition ~~3-4~~. [imposed under s78]

Easements

- ~~44~~ 7. The Approval holder shall survey and register the appropriate easements as shown on Scheme Plan SC-02 (Appendix B10a), including but not limited to:
- a. Easement Z (Right of Way) to be granted over part of Lot 9 for the benefit of Lot 10 (comprised in the DOC-Get Area) for the purpose of conservation activity and maintenance undertaken by DOC or its agents and public pedestrian access. DOC shall have the full and unrestricted right of access, including the right to enter, pass, and repass on foot or by vehicle or machinery, together with its employees and contractors, for the sole purpose of accessing adjoining conservation land for inspection and maintenance related to conservation purposes. Public pedestrian only access shall be permitted, subject to any reasonable temporary restrictions required for public safety, ecological restoration works, pest or weed control, maintenance, fire risk, weather events, or quarry operational safety and may be reasonably determined and specified from time to time by the grantor. DOC shall have the right to carry out inspection, maintenance, repair, and improvement works on any tracks, roads, or structures within Easement Z as reasonably required for conservation purposes and managing public pedestrian access subject to standard terms regarding the suitable management of health and safety obligations and ensuring that the grantor has reasonable prior notice of the intended access and programme of works.

Costs

- ~~7~~ 8. For avoidance of doubt all ~~reasonable~~ costs associated with complying with Conditions 1 to ~~6~~ 7 shall be met by the Approval holder.

Proposed draft conditions (Cl.32 Sch.6)

To prepare the land for exchange the following conditions are imposed under schedule 6 clause 32:

~~29~~ 9. The land being given by the Crown by way of exchange must be transferred to the Approval holder, without reservation, classification, interest or encumbrance, to allow for transfer from the Crown to the Approval Holder after Gazettal.

Costs

~~8~~ 10. The Approval holder must pay the Minister's costs and expenses of, and incidental to, preparing and signing the Exchange Agreement or any extension or variation of it, including surveying, conveyancing and legal costs. [imposed under s78]

~~9~~ 11. The Approval holder must pay to the Minister all ~~reasonable~~ costs associated with the Minister's work to give effect to the Exchange Agreement, ~~calculated-determined~~ at ~~DOC's~~ the standard ~~cost recovery~~ rates ~~current at the date the work is undertaken and invoiced within 3 months of the relevant work being completed then applying in the Department of Conservation for cost recovery.~~ [imposed under s78]

~~10~~ 12. The Approval holder must pay in full immediately and on demand all ~~reasonable~~ costs and fees (including solicitors' costs and fees of debt collecting agencies engaged by the Minister) arising out of and associated with steps taken by the Minister to enforce or attempt to enforce the Minister's rights and powers under the Exchange Agreement including the right to recover outstanding money owed to the Minister. [imposed under s78]

Bonds for Conservation Works

~~12~~ 13. ~~If the Land Exchange is approved,~~ The Approval holder shall provide to the Minister, before giving effect to the exchange, a performance security ("~~Bond~~") ~~for the purpose of ensuring completion of the "Conservation Improvement Works" defined below. either in cash or as a surety bond from a trading bank, insurance company or bond guarantor, a bond set in accordance with Condition 13(b).~~

The Bond shall:

- (a) **Scope:** Secure the Approval holders timely performance of all identified Conservation Improvement Works on the land to be given, ~~as specified in Conditions 13, 22, 27 and 28 (for example, weed clearance, native planting, fencing, and pest management), but shall not cover any other obligations.~~
- (b) **Amount:** Be in an amount equal to the reasonably estimated cost (as certified by an independent Quantity Surveyor or registered valuer or contractor) of completing the Works.

The Bond amount shall be subject to audit and revaluation by mutual agreement (or by binding expert determination if disputed). ~~In no case shall it exceed a specified cap \$200,000.~~

- (c) **Form:** Be provided by way of a performance guarantee by a group company of the Approval holder which provides performance security, or (if preferred by the Approval holder) an unconditional bank guarantee or irrevocable performance bond from a NZ-registered bank or insurer reasonably acceptable to the Minister (alternatively, a cash deposit may be lodged).
- (d) **Release Schedule:** The Bond shall be released in two stages:
- (i) fifty percent (50%) upon ~~completion of Condition~~ and acceptance ~~of the specified Conservation Improvement Works~~ by the Minister or the Minister's agent after seven years, and the Minister (or his agent) being satisfied that all other components of the Conservation Improvement Works have been completed in accordance with the conditions; and
 - (ii) the remaining fifty percent (50%) at the close of the ~~24-month~~ ten year maintenance period following such completion, provided the land remains free of noxious weeds and meets ~~agreed success the minimum~~ standards set out in Table 1, 2 and 3. ~~If all Conservation Improvement Works are completed to satisfaction before the expiry of 24 months, the second half may be released early.~~

14. a. If the Approval holder breaches or fails to carry out the Conservation Improvement Works, or in carrying out the Activities there arise adverse effects not authorised or reasonably foreseen, the Minister may call on the bond or any portion of it to ensure the Conservation Improvement Works are completed in accordance with the conditions and/or to remedy or mitigate those adverse effects.

~~(e) Default and Call:~~

- b. The Bond shall only be drawn upon if the Approval holder fails to complete the ~~specified~~ Conservation Improvement Works including by the ~~agreed~~ deadlines set out in Tables 1, 2 and 3 (or maintain them during the maintenance period) after receiving written notice and a 30 working day cure period. Any call on the Bond shall be limited to the cost of completing or remedying the Works, and the Applicant may dispute any call by written notice; unresolved disputes will be referred to arbitration in New Zealand under the Arbitration Act 1996 before funds are released.

~~Conservation Improvement Works means those specific enhancement works or restoration measures agreed by the parties and detailed in an annex to these conditions (for example, specified planting areas, pest proof fences, access tracks, or restoration of riparian margins).~~

~~The Bond is a section 78 condition (Crown risk condition) and shall not be used as a penalty. The value of the Bond is expressly intended to cover only the cost of completing the above-defined Conservation Improvement Works.~~

Fencing

~~13-15.~~ The Approval holder must, at its cost, construct, ~~only that~~ all boundary fencing which is reasonably necessary to exclude persons, meet any existing covenant requirement, keep stock out or address an identified safety risk on the external boundary of the land being transferred to the Crown. The required locations and fence standard must be identified in a pre-settlement fencing plan agreed by the parties, acting reasonably.

~~5 16.~~ ~~Before settlement, the~~ The Approval holder must, install ~~the western boundary~~a fence of the Firth Block ~~approximately 60 metres in length and so that it is set back~~ at least 6 metres from the edge of any ~~earth-worked areas on~~ the adjacent Belmont Quarry as shown as shown in Figure 5-3 in the Baseline Geotechnical Limited Geotechnical Appraisal Report 2025 (Appendix B12 to the Land Exchange Application) (Geotechnical Report) (Firth Block pit face in the location shown on Drawing W15069_Land_Exchange_Concept Boffa Miskell 1 December 2025, or as otherwise determined by an independent ~~certified by a~~ suitably qualified geotechnical engineer ~~for equivalent safety outcomes~~ as being suitable to address the instability issues at the quarry face to the west of the Firth Block described in the Geotechnical Report. Any report by an independent suitably qualified geotechnical engineer shall be provided to DOC, and the design and location, certification and design must be provided to the Minister for approval before construction. The setback area shall be clearly marked as conservation land and entry to the setback area shall be clearly marked as being "Entry Prohibited".

Biosecurity Act

~~17.~~ The Approval holder will at its cost ensure that the land to be transferred to the Minister is compliant with any applicable "good neighbour" rules under the Biosecurity Act to the Minister's satisfaction prior to the Settlement Date. [imposed under s78]

Rates

~~14-18.~~ There shall be no apportionment of rates or other outgoings paid by the Parties. [imposed under s78]

Structure and improvements, condition of land

~~15-19.~~ The land being acquired by the Approval holder, including any structures or improvements thereon, is transferred and accepted by the Approval holder on an "as is, where is" basis. [imposed under s78]

~~16-20.~~ The Minister accepts no liability (financial or otherwise) in relation to any structure or other improvement on the land being acquired by the Approval holder, including for any remedial, removal, or maintenance costs associated with any structure or improvement. [imposed under s78]

~~17-21.~~ The Approval holder must remove from the Approval holder's Land only those structures, improvements or materials identified in a joint pre-settlement schedule prepared by the parties, no later than 20 working days before settlement. Reinstatement is limited to areas directly disturbed by that removal. Unless otherwise instructed by the Minister, the Applicant will at its cost remove any structures and improvements from the land to be transferred to the Minister and will reinstate any land impacted by removal works. [imposed under s78]

~~18-22.~~ Any structure or improvement expressly agreed in writing to remain on the Approval holder's land at settlement must, as at settlement, be safe for its intended use and lawful so far as reasonably ascertainable from existing records and visible condition. The Applicant will, at its cost, ensure that any structures and improvements remaining on the land to be transferred to the Minister are safe and lawful. *[imposed under s78]*

~~19-23.~~ The Approval holder must remove surface rubbish, dumped materials and anthropogenic debris identified in the joint pre settlement schedule or visible upon reasonable inspection, and reinstate areas directly disturbed by that removal. This condition does not extend to buried material not identified in pre settlement investigations. The Approval holder must at its own cost remove all rubbish from the land to be transferred and will reinstate any land impacted by removal works.

24 The Approval holder will take all steps reasonably necessary, at its own cost, to ensure that the stability of the Firth Block will not be undermined by the quarry activity. Any instability issues that arise must be immediately remediated by the Approval holder at its own cost.

Rights of first refusal

25 The Approval holder confirms that any rights of first refusal or similar obligations that may otherwise be triggered by this land exchange have been waived. *[imposed under s78]*

Ecological Restoration Plan [ERP]

~~20-26.~~ No later than ~~20-30~~ working days before settlement, the Approval holder must provide to DOC for its approval with an Ecological Restoration Plan [ERP] ~~prepared by a suitably qualified and experienced ecologist. The approval is to confirm that the Ecological Restoration Plan provides the means to achieve the purpose and addresses the matters set out in Condition 28 and certified by that ecologist as being consistent with these conditions.~~

~~24-27.~~ The ERP must be prepared by a suitably qualified and experienced ecologist.

~~22-28.~~ The purpose of the ERP is to set out the methods the Approval Holder will implement to:

- a. reduce ~~target weed~~ species listed in Table 1 on the Northern Gully, Southern Gully, Firth Block and Dry Creek sites, including the wetlands, to a minimum target of 90% eradication.
- b. protect and improve the condition of indigenous vegetation on the sites;
- c. successfully establish 200 swamp maire in the Southern Gully;
- d. ~~target achieve~~ 90% success rate of planted swamp maire so that at least 180 specimens survive after seven years;
- e. achieve the standards in Table 1 for weed species;
- f. achieve the standards in Table 2 for replanting of indigenous vegetation~~s~~; and
- g. ~~target achieve~~ a minimum 90% success rate for newly planted indigenous vegetation after five years (other than swamp maire which has a seven year timeframe).

To achieve this purpose, the ERP must include the following:

- h. Measures for how weed control will be undertaken on the sites. The target weed species are ~~these~~ listed in Table 1;
- i. Measures for managing the introduction of weed plant species to the sites;
- j. Identification of times of year to focus on particular weed control strategies;
- k. Methods for giving effect to the Greater Wellington Regional Pest Management Plan;
- l. A yearly report on the results of weed management will be provided to DOC.
- m. Baseline and ongoing monitoring of threatened plant populations and weed species at the sites;
- n. A planting plan for indigenous species including the timing of plantings;
- o. Adaptive management and restorative measures to ensure the survival of threatened plant populations on the sites; and
- p. Methods for protecting the wetland areas and the vulnerable roots of the new plantings of swamp maire and other species from visitors to the Southern Gully.

Table 1. Weed management requirements

Location	Duration of management	Target objective Minimum requirement
Northern Gully	5 10 years	90% eradication of the following weed species: • Old man's beard (<i>Clematis vitalba</i>) • Tradescantia No exotic canopy tree species.
Southern Gully	5 10 years	90% eradication of the following weed species: • Blackberry • Exotic vines • Pampas
Dry Creek	5 10 years	90% eradication of weed species • Exotic weeds • Broom • Gorse • Buddleia • Spanish heath • Old man's beard • Wattle • Tradescantia • Rama grass • Soft rush nasturtium • Creeping buttercup • Verbena

		• Ink weed • Pampas
Firth Block	5 10 years	90% eradication of weed species

Table 2: Ecological restoration requirements

Location	Indigenous species	Minimum area/ density / number of specimens	Timeframe and target <u>minimum</u> success rate
Southern Gully	Swamp maire	200 individual plants to be planted when they reach at least PB3 size with a vegetative minimum height of 600mm (not including the bag). This is likely to be 2 years after propagation of <u>eco-sourced</u> seedlings.	90% success rate in the seventh year following planting on the site.
Dry Creek	A mixture of the following species all eco-sourced: • Pigeonwood (<i>Hedycarya arborea</i>), • Ramarama (<i>Lophomyrtus bullata</i>), • Hebe (<i>Veronica stricta</i> var. <i>stricta</i>), • Kānuka (<i>Kunzea robusta</i>), • Five finger (<i>Pseudopanax arboreus</i>), • Wharangi (<i>Melicope ternate</i>), • Shining karamu (<i>Coprosma lucida</i>), • Thin leaved coprosma (<i>Coprosma areolate</i>),	Replanting of 0.8 ha with indigenous species within three years. Minimum 7,000 plants, of which at least 500 must be ramarama.	90% success rate in the fifth year following planting.

	• Kanono (<i>Corprosma grandifolia</i>), • Karamū (<i>Coprosma robusta</i>)		
Firth Block	Kāmahi (<i>Pterphylla racemosa</i>) Kānuka (<i>Kunzea robusta</i>)	Minimum of 1,000 of each species planted within 10 m of the quarry edge within one year The location must avoid the skink mitigation site that has previously established.	90% success rate in the fifth year following planting.

~~22~~ 29. The ERP must be prepared in consultation with Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira. It may identify opportunities for mātauranga Māori, cultural engagement and restoration participation.

~~23~~ 30. The Approval holder must provide a draft ERP to Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira for comment no later than 20 working days before ~~finalising the ERP submitting the ERP to DOC for approval~~. When providing the final ERP to DOC, the Approval holder must include any written comments received and a ~~brief~~ response schedule explaining how those comments were addressed. The Approval holder bears its own consultation costs and ~~any all~~ reasonable costs of DOC, Taranaki Whānui ki te Upoko o Te Ika and Te Rūnanga o Toa Rangatira performing their roles in Condition 26 and 29 respectively ~~pre-agreed tangata whenua participation costs, but not DOC's internal review costs under this condition~~

31. The Approval Holder must undertake the anticipated activities in accordance with the ~~certified~~ approved ERP prepared in accordance with ~~pre~~-conditions ~~24 26~~ to ~~24 30~~ above at all times.

~~32. The Approval holder may amend the ERP where the amendment is certified by a suitably qualified and experienced ecologist as improving practicality, efficacy or environmental fit while remaining materially consistent with these conditions. The Approval holder must give DOC written notice of the amendment at least 10 working days before implementation. If DOC objects within that period and explains the inconsistency relied on, the amendment must not proceed until resolved.~~

~~33~~ 32. The ERP may be amended by the Approval holder at any time, provided the amendments are:

a. for the purpose of improving the efficacy of the management of weeds;

- b. for the purpose of providing for better planting and maintenance methodology(s). This may include substituting plant species if it is found that a more appropriate plant species is better suited to this environment, while achieving biodiversity enhancements;
- c. for the purpose of applying best practicable measures;
- d. consistent with the conditions of this approval; and
- e. submitted in writing to DOC ~~40 days~~ for its approval prior to any amendment being implemented.

33. The Applicant must provide DOC with an annual report within 30 working days after each year of implementation of the ERP. The first annual report will be due 12 months after approval of the ERP. The report must summarise planting undertaken, weed management, monitoring results for weeds and restoration planting, any target exceedances for weeds and/or any ecological restoration minimum success rates that have not been achieved (Tables 1 and 2), and any response actions implemented.

34. Plants must be eco-sourced within the Wellington Ecological District and sourced from a reputable nursery able to provide provenance information on request.

35. ~~Except where the ERP specifies a different and ecologically appropriate grade for a particular species or location, a~~ All plants must be healthy, not root-bound, ~~and generally no smaller than PB2~~ be in PB3s or equivalent at the time of planting and weed free.

36. Slow-release fertiliser ~~may~~ must be used ~~where recommended by the ecologist or nursery supplier for the relevant species and site conditions~~ at the rate recommended by the manufacturer with every plant, at the time of planting.

37. Weed-free mulch ~~may~~ must be used ~~where recommended by the ecologist~~ for moisture retention and weed suppression, except in wetland areas ~~or other locations~~ where mulch is ecologically inappropriate.

Mammalian Pest Management Plan

~~24-38.~~ No later than ~~20~~ 30 working days before settlement, the Approval holder must provide ~~to~~ DOC ~~for its approval~~ with a Mammalian Pest Management Plan. ~~The approval is to confirm that the Mammalian Pest Management Plan provides the means to achieve the purpose and addresses the matters set out in Condition 27. certified by a suitably qualified and experienced ecologist or pest management practitioner as being consistent with Conditions 26 to 28~~

39. The Mammalian Pest Management Plan must be prepared by a suitably qualified and experienced ecologist.

~~26~~ ~~40.~~ The purpose of the Mammalian Pest Management Plan is to set out how mammalian pest control will be undertaken on the Northern Gully, Southern Gully, Firth Block and Dry Creek sites ~~and to support the ecological restoration outcomes required by these conditions~~ achieve the minimum levels in Table 3 below.

- ~~27.~~ The Mammalian Pest Management Plan must include:
- ~~a. the target pest species listed in Table 3;~~
 - b. the areas where pest management will be undertaken;
 - c. the control methods and timing of control;
 - d. monitoring methods for ~~target~~ pest species set out in Table 3;
 - e. response actions where monitoring ~~or contractor observations~~ indicates that pest activity is not achieving the targets in Table 3 ~~materially reducing the effectiveness of restoration or natural regeneration;~~ and
 - f. annual reporting to DOC.

~~28.~~ ~~The Mammalian Pest Management Plan may be amended where the amendment is certified by a suitably qualified and experienced ecologist or pest management practitioner as improving practicality or effectiveness while remaining materially consistent with these conditions. The Approval holder must provide DOC with a copy of any certified amendment before it is implemented. A pest detection or increase in pest activity is not, of itself, a breach of these conditions, provided the Approval holder implements the relevant response~~

Table 3. Mammalian pest control management

Location	Pest species	Duration	Response trigger <u>Targets</u>
Northern Gully	Possums	10 years	Contractor records observations indicate pest levels are materially reducing
Northern Gully	Goats		<u><1 possum / camera / week</u>
Tawa-Kāmahī			<u>< 1 goat contact per 3 hunter days (8 hour days) measured over a year of hunting</u>
Northwestern Forest and Eastern Pukatea Forest	Rats		<u>< 3 rats / camera / week (measured 3 x per year – February, May and November)</u>
Southern Gully	Possums	10 years	Contractor records observations indicate pest levels are materially reducing
			<u><1 possum / camera / week (measured 1x per year)</u>
Firth Block around the water body	Rodents	10 years	Contractor records observations indicate pest levels are materially reducing

bordering the park, OBDA <u>DOC-Give</u> and Firth Block (Farm Pond)			<u>< 3 rats / camera / week (measured 3 x per year – February, May and November)</u> <u>< 3 mice/camera/week (3 x seasonally per year)</u>
All sites	Mustelids	10 years	Contractor records observations indicate pest levels are materially reducing <u>< 2 mustelids/ camera/week (3 x per year – February, May, November)</u>

~~38-41.~~ The Approval holder must ~~implement~~ undertake all activities in accordance with, the approved Mammalian Pest Management Plan ~~during the periods stated in Table 3 at all times.~~

~~28-42.~~ The Mammalian Pest Management Plan may be amended where the amendment is ~~certified by a suitably qualified and experienced ecologist or pest management practitioner as~~ improving practicality or effectiveness ~~while remaining materially consistent with these conditions.~~ The Approval holder must submit the amended Mammalian Pest Management Plan in writing to DOC for approval, prior to any amendment being implemented. A pest detection or increase in pest activity is not, of itself, a breach of these conditions, provided the Approval holder implements the relevant response actions in accordance with the Mammalian Pest Management Plan.

~~39-43.~~ The Approval holder may amend the Mammalian Pest Management Plan at any time, provided the amendments are submitted in writing to DOC for approval, prior to any amendment being implemented. ~~where the amendment is certified by a suitably qualified and experienced ecologist as improving practicality or efficacy while remaining materially consistent with these conditions.~~

~~a. The Approval holder must give DOC written notice at least 10 working days before implementation.~~

~~If DOC objects within that period and explains the inconsistency relied on, the amendment must not proceed until resolved.~~

44. The ~~Applicant~~ Approval holder must provide DOC with an annual report within 30 working days after each year of implementation of the Mammalian Pest Management Plan. The first annual report will be due 12 months after approval of the Mammalian Pest Management Plan. The report must summarise pest control undertaken, monitoring results, any ~~threshold~~ target exceedances, and any response actions implemented.

Contaminated land

~~40-45.~~ If, within 12 months after settlement, contamination (as defined in National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) is identified on the Approval holder's Land transferred to the Crown and that contamination:

- ~~a. was caused by the activities of the Approval holder occurring before settlement;~~
- ~~b. was not disclosed in the pre settlement contamination reports; and~~
- ~~c. exceeds the applicable standard for the actual or intended conservation and recreation use of the land under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 requiring management, then the Approval holder must, after receiving written notice, be given a reasonable opportunity to investigate and carry out any remediation or risk management works.~~

~~Compliance is to the standard required by any remediation plan prepared by a suitably qualified contaminated land practitioner.~~

If, within 12 months of the Settlement Date, the land being received by the Minister is found to be contaminated with a previously undisclosed organic or inorganic substance that poses a risk to public health or to the environment, the Applicant will immediately remedy the situation to the satisfaction of the Minister. [imposed under s78]

~~41-46.~~ Before settlement, the Approval holder must undertake a **targeted** contaminated land investigation of the ~~discrete area identified in the~~ Northern Gully, including the deposited material in the stream bed and on the adjacent stream embankment.

~~42-47.~~ The investigation must be undertaken by a suitably qualified contaminated land practitioner and must determine whether contamination associated with the area is present at concentrations requiring management or remediation having regard to:

- a. the applicable soil contaminant standards for the actual or intended conservation and recreation use of the land under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, where applicable;
- b. where relevant, potential effects of such contamination on water, sediment or ecological receptors, the ANZG (2018) default guideline values or other applicable environmental guideline values;

~~e-48. a.~~ If the investigation in Condition 46 identifies contamination requiring management or remediation, the Approval holder must prepare and implement a remediation ~~or risk management~~ plan certified by a suitably qualified contaminated land practitioner; ~~and~~

~~d-b.~~ Compliance with Conditions 48(a)~~[44 and 45]~~ is achieved when a suitably qualified contaminated land practitioner certifies that any contamination associated with the deposited area has been investigated and, where required,

~~managed or~~ remediated to the standard required for the actual or intended conservation and recreation use of the land detailed above.

Continuance of rights

- ~~43-49.~~ The rights and obligations of the parties under this agreement continue beyond settlement of this agreement accordingly those rights and obligations will not merge in the settlement but will continue thereafter with full force and effect. *imposed under s78]*

Signage

50. The Approval holder must construct and install signage in accordance with DOC's sign standards indicating the reserve name at the Approval holder's cost. These shall be placed in the following locations to make the public aware of ownership and right of access:
- a. At the boundary of the Southern Gully Block facing Liverton Road;
 - b. On the Hebden Crescent frontages of the Firth and Dry Creek Blocks; and
 - c. On the existing easement on the Dry Creek Loop Track within the Dry Creek Block.

STATEMENT OF ADVICE: Matt Ward – RESTORE

Botanical and Ecological Restoration

Independent contractor local in Wellington Region

14/4/26

INTRODUCTION

1. My name is Matt Ward

INSTRUCTION

2. I have been requested to provide expert advice on behalf of the Department of Conservation (DOC) on the Belmont Quarry Land Exchange application.

QUALIFICATION AND EXPERIENCE

3. I am an independent Botanist working from my home in Pukerua Bay, Porirua. I have a Bachelor of Science in Environmental Science and Geography from Victoria University of Wellington (2007). I have worked with plants since graduating, firstly at Zealandia – Te Māra a Tāne as a Conservation officer, then at Kapiti Coast District Council as an Ecological Restoration Officer. I have worked for myself as Matt Ward – RESTORE since 2012. I have 20 years' experience working with plants and plant conservation.
4. I have a good understanding of the Wellington Regional flora and environment. Work that is especially relevant to this application includes:
 - i. Restoration of Baring Head's Rare and Endangered plants (GWRC), 2017 – ongoing.
 - ii. Technical plant identification for the LUCAS project- specifically orchids (DOC), 2021-ongoing.
 - iii. Tier 1 Dunes Health Monitoring Work (GWRC) 2017 – ongoing.
 - iv. Mana Island Floral Diversity Enhancement Report Stage 2 (FOMI) 2015-2016.

CODE OF CONDUCT

5. Whilst it is acknowledged this is not an Environment Court Proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this advice is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

SCOPE OF ADVICE AND EXPERT OPINION

6. My expert advice relates to the following:
 - i. Adequacy of the Applicant's assessment of botanical and vegetation elements of the project, including identification of any values that have not been assessed or have been insufficiently characterised.

MATERIAL CONSIDERED

7. In preparing this advice I have reviewed the following document about the vegetation content of this land exchange application:

BlueGreen – Belmont Quarry Land Exchange – Overview of Ecological Values. Prepared for Winstone Aggregate Ltd, 20 February 2026. (v12_FINAL_20260220)

- I have visited the Winstone's sites on 4th September 2025 & 19th March 2026.
- I have visited the Department of Conservation site on 9th, 12th and 16th of September 2025.

SUMMARY

This application for land exchange involves Winstone Aggregates (the applicant) offering some adjacent land to the Belmont Regional Park (BRP) administered by the Department of Conservation (DOC) for some of the BRP land adjacent to their active quarry Hebden Crescent, Lower Hutt. ~~The applicant intends to use the 'DOC give' area as an Over Burden Deposition Area (OBDA), therefore removing all the organic material and reshaping the area permanently.~~ I will review the material in the application report stated above to accurately cover the details of the vegetation present in both the 'DOC give' and 'DOC take' areas. The plants present may be used to assess the quality of the areas in question, to ascertain whether this application will benefit the DOC estate and the BRP.

*The original version of this report was dated 25 May 2026. On receipt of comments on the report from the applicant and other parties, I have amended this version to more clearly articulate, and in some cases adjust, my position. Where I have made these changes, they are indicated in **red** text.*

RESPONSE TO BLUEGREEN SUMMARY OF FINDINGS

KEY ISSUES

The following headings are in the order they appear in the BlueGreen report, along with other issues needing consideration.

1. LENZ Threatened Environments pp. 12-13.

The BlueGreen report states that the OBDA is of low value retaining very little indigenous vegetation when applying the LENZ Threatened Environments rating (MWLR, 2026). This is a moot point as the evaluation used is broadscale 1:25,000, and suggested by the authors not for use to make any objective conclusions in substitution for on-the-ground assessments (Cieraad *et. al.*, 2015; Walker *et. al.*, 2007).

2. Historical Context (The OBDA through time pp. 13-14)

The area where the OBDA is located is shown in figure 1 (Retrolens, 2026), it shows that areas of the farmed land was not completely devoid of native vegetation. The flatter more favourable pasture areas are those paler areas in the black and white image. The two magnified insets of the darker areas in figure 1 show the differences in texture present, likely relating to taller (than pasture) vegetation.

The likelihood these areas are remnant wetlands and rare forest type is supported by the plant species still present 85 years later, not suggesting any of the actual specimens are original, more likely descendants. The texture of the vegetation seen in figure 1, suggests a combination of various species, not likely to include *Ulex europaeus* – Gorse, (FACU species Clarkson *et. al.*, 2013) as suggested in the BlueGreen report (Section 3.4, page 13). Figure 3-5.

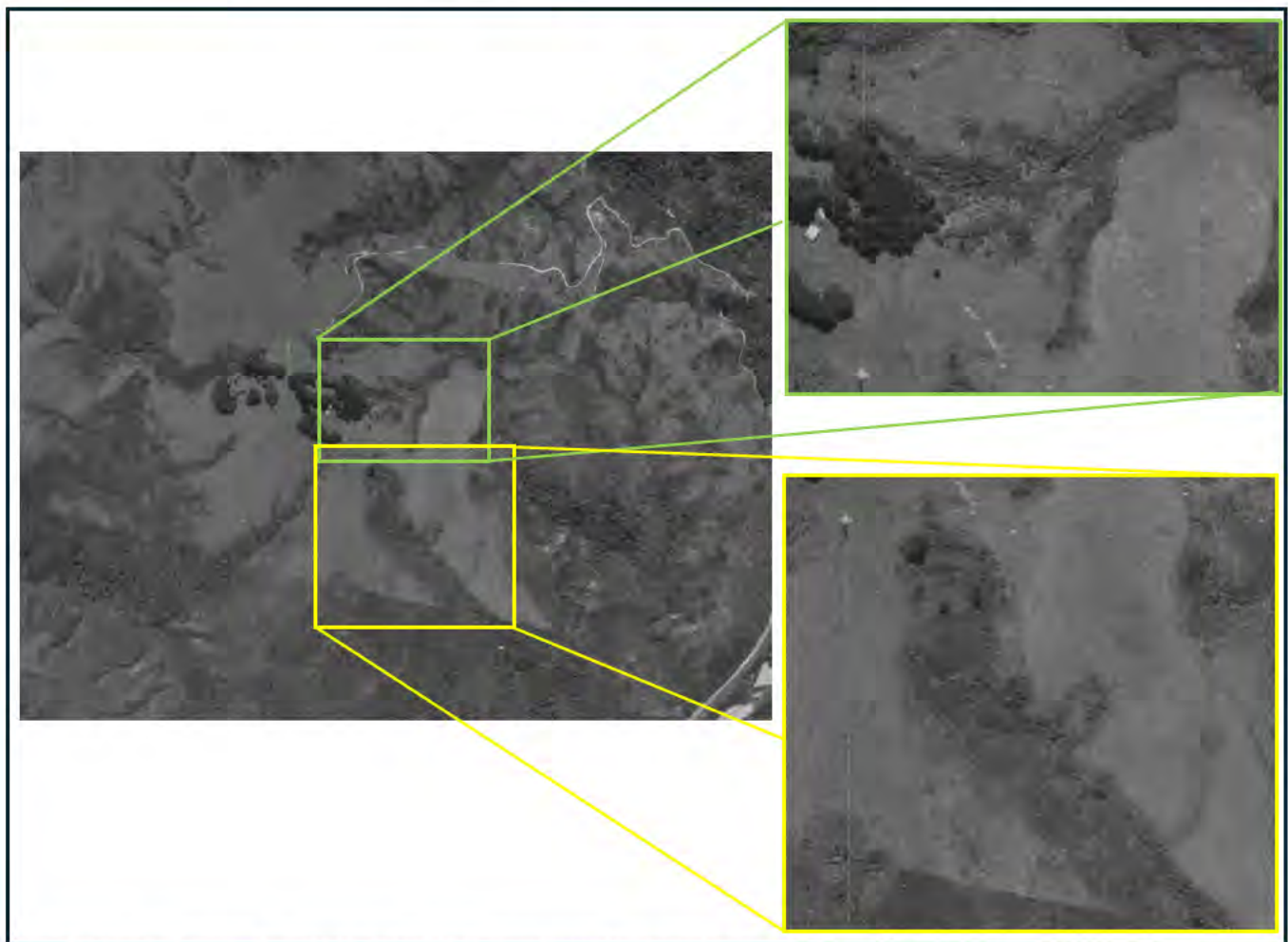


Figure 1 (above). An image from 1941 of the OBDA general area showing paler areas which would have been used for livestock.
(top-right). Inset shows a close-up of the remnant vegetation where a considerable wetland still exists today.
(bottom-right). Inset shows a close-up of the large gully which shows considerable textures of various potential plant species.

The areas featured in the insets directly correspond with the shallow gully areas where valued plant species either rare and endangered or obligate wetland species were recorded in 2025 (Figure 2.).

Figure 2 has the headwater features added as I recorded them on site in September 2025. These features when placed over the 1941 image (Figure 3.) directly correspond with the darker areas suggested to have remained vegetated by native plants during pastoral farm use.



Figure 2. The OBDA present day, with the wet gully system, and Threatened Plants mapped as they were found during surveys in September 2025.

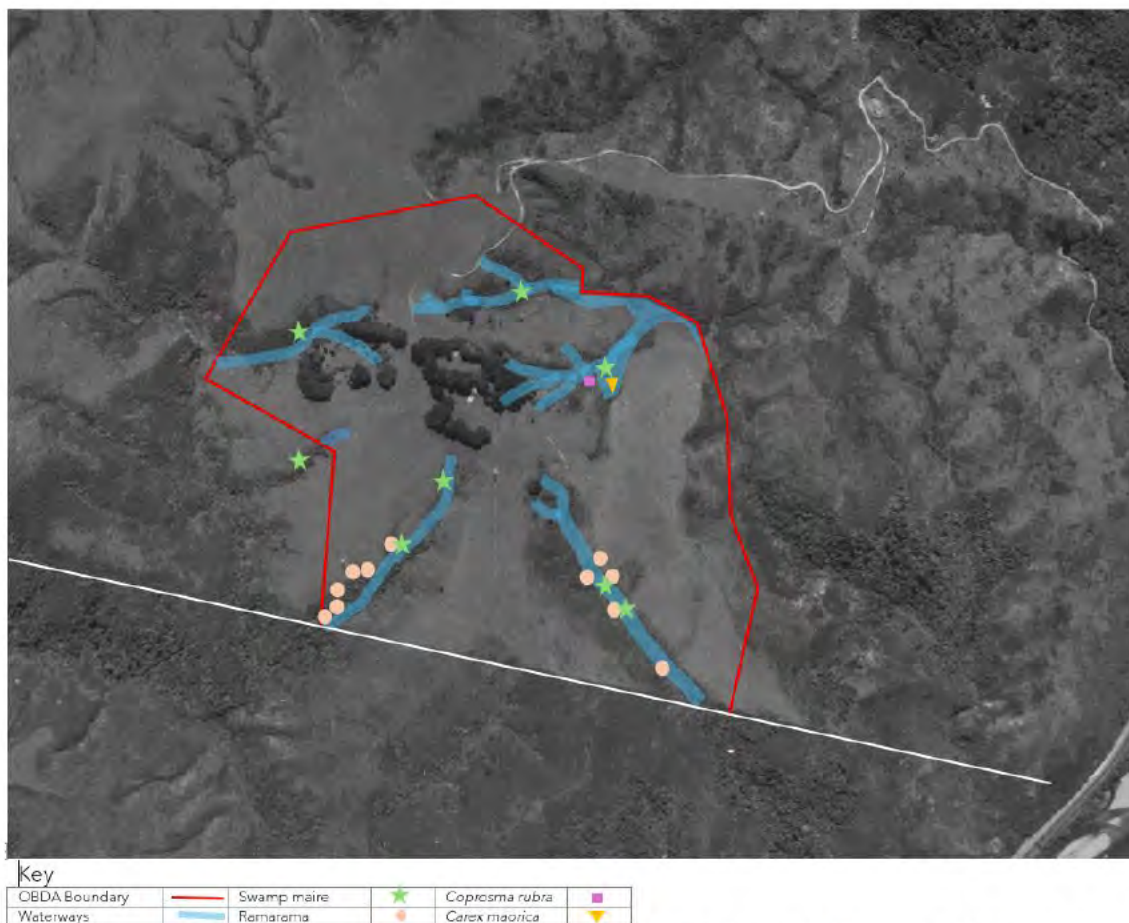


Figure 3. An image of the 1941 area of the OBDA with the Nationally Threatened Plants mapped as they were recorded during surveys in September 2025 overlaid.

3. Swamp Maire (pp. 85-88)

During my surveys in September 2025, 9 mature (reproductive age) specimens of the Threatened Nationally Vulnerable *Syzygium maire*- swamp maire were located within the OBDA area (see Appendix 3a). All of the specimens were found in areas related to the shallow gullies of the headwaters as shown in figures 1 and 2 as green stars. During a brief traverse through the OBDA on March 19th, 2026, whilst exiting the Northern Gully section of Winstone's, a *Syzygium maire* – swamp maire was seen in full flower and fruit, an excellent example of a healthy thriving specimen within the OBDA (see figure 6).

In section 9.3.1 (page 88) 'Swamp Maire Conclusion' the BlueGreen report it states that:

"We recommend here that as part of the exchange, 200 swamp maire trees are raised from local sources (near enough 20:1) and planted into the wetland and managed to establishment (5 years), ensuring that the DOC-Get also has swamp maire trees."

This rate of 20:1 is ~~not~~ a level acceptable to DOC. I am aware of a precedent set in ~~another~~ a project for destruction or damage of swamp maire being a rate of 200:1 for destruction, and 100:1 for damage as accepted by New Zealand Transport Agency (NZTA) in 2019 (page 11). ~~This project is related to a resource consent designation, therefore not strictly appropriate in this situation, this precedent does however reflect the importance of this highly valued taonga species.~~ The Notice of requirements states:

"Include the planting of swamp maire at the following rates:

- i) 100 swamp maire trees for any existing swamp maire tree affected by more than 10% of live growth pruning as determined by an independent, suitably qualified and experienced arborist;*
- ii) 200 swamp maire trees for any existing swamp maire tree that dies as a result of enabling or construction works activities, as determined by an independent, suitably qualified and experienced arborist."* (NZTA 2018; NZTA 2019)

Following the suggested off-set planting paragraph the report states:

"We also recommend that part of the substantive application attempts to transfer the existing nine swamp maire in the OBDA by way of whole tree or pruned tree and root ball transfer."

There is no evidence to suggest this methodology will be successful. While well-intentioned, the approach is currently unproven and lacks a conceptual or practical basis.



Figure 6. Healthy *Syzygium maire* – swamp maire with both flowers and fruit present in March 2026. Photos M. Ward 2026.

4. Wetland Species

Within the OBDA and Southern Gully (DOC Get) wetlands, several indigenous plant species were identified that are either restricted to or commonly found in such habitats. Clarkson *et. al.* (2021) classifies the affinity of New Zealand plants for wetlands using five indicator statuses:

- OBL: Obligate Wetland. Almost always is a hydrophyte, rarely in uplands (non-wetlands)
- FACW: Facultative Wetland. Usually is a hydrophyte but occasionally found in uplands
- FAC: Facultative. Commonly occurs as either a hydrophyte or non-hydrophyte
- FACU: Facultative Upland. Occasionally is a hydrophyte but usually occurs in uplands
- UPL: Obligate Upland. Rarely is a hydrophyte, almost always in uplands.

For the purpose of this report only the top 3 statuses are referred to, as they are of higher likelihood to be supporting the wetlands present in the OBDA or Southern Gully. The 20 species recorded in the OBDA are as follows:

- OBL **Trees/Shrubs** *Syzygium maire*- maire tawake, waiwaka.
Sedges *Carex dissita* - forest sedge, *Carex maorica* - Māori sedge (Regionally Uncommon), *Carex secta* - purei, pukio, *Eleocharis acuta*- sharp spike sedge, *Isolepis inundata*.
- FACW **Ferns** *Parablechnum minus*- swamp kiokio.
Sedges *Carex geminata* – rautahi, *Carex lessoniana*- rautahi, *Carex virgata* - pukio, toito, *Schoenus maschalinus* - dwarf bog rush.
Herbs *Centella uniflora* - centella
- FAC **Trees/Shrubs** *Cordyline australis*- ti kouka, *Dacrycarpus dacrydioides* - kahikatea, *Laurelia novae-zelandiae* – pukatea, *Leptospermum scoparium* var. *scoparium* – mānuka.
Ferns *Histiopteris incisa* – mātātā, *Parablechnum novae-zelandiae* - kiokio, horokio.
Herbs *Cardamine corymbosa*, *Hydrocotyle moschata* var. *moschata* - hairy pennywort.

The ecological integrity of the OBDA wetlands is maintained by a closed canopy of *Dicksonia squarrosa* (Wheki, tree fern). The high density of these up to 8-metre-tall tree ferns creates a significant shading effect, preventing the encroachment of light-demanding invasive species, whilst allowing native species to create ground cover. This canopy cover has provided the basis upon which the rare forest type WF8 Kahikatea, pukatea forest — Regionally critically endangered — 1% remaining (Singers *et. al.*, 2018), has been able to regenerate. A key component to this forest type is the earlier mentioned swamp maire, a species not found anywhere else in the BRP.

The Southern Gully core wetland was briefly assessed, noting a predominance of planted species. However, the site is heavily infested with *Rubus fruticosus* agg. (blackberry). Routine maintenance is recommended to *enhance* the ecological health and robustness of this wetland restoration. Naturally occurring wetland species recorded were as follows:

- OBL **Sedges** *Carex secta* - purei, pukio (possibly only planted as all specimens were of similar age/size)
- FACW **Sedges** *Carex geminata* – rautahi

5. Forest Type

The existence of the swamp maire and various other wetland plants in the areas discussed above align to a type forest rare to the Wellington Region. The forest type described in Singers *et. al.* (2018) 'WF8 Kahikatea, pukatea forest — Regionally critically endangered — 1%' is known from nearby see figure 7. The botanical components of this forest type mentioned in Singers *et. al.* (2018) include *Laurelia novaezelandiae* (pukatea), *Dacrydium cupressinum* (rimu), *Dacrycarpus dacrydioides* (kahikatea), swamp maire, *Beilschmiedia tawa* (tawa), *Melicytus ramiflorus* (mahoe), *Alectryon excelsus* (titoki), *Sophora microphylla* (kowhai), *Plagianthus regius* ssp. *regius* (ribbonwood) *Elaeocarpus hookerianus* (pokaka), *Freycinetia banksii* (kiekie), *Ripogonum scandens* (supplejack, kareao, pirita), of which 75% are still present. Most of the species mentioned are at regenerating stage, but the fact they are present is important. Singers *et. al.* suggests that typically kahikatea is harvested from them, historically a timber used commercially, particularly for butter boxes (Dawson, 2009). Some of the other smaller OBL wetland species noted are shown in figures 8-10.

'Threatening Processes: This forest type has been greatly reduced in extent with land development for agriculture and most examples are now highly fragmented or small in size. Most of the other extant examples have additionally suffered from lowered water tables as a result of land drainage, allowing invasion or replacement by species more suited to drier habitats.' (Singers *et. al.*, 2018)



Figure 7. Known extent of the WF8 Pukatea forest type in the wellington Region (Singers *et. al.* 2018). The orange circle shows the location of the OBDA and its vicinity to other WF8 type forest. It is not far-fetched to see how an extension of the known range could be possible.



Figure 8. (above) An OBL species, *Carex maorica* (Māori sedge) seen in the wetland area on the Northeast of the OBDA, the only known location in BRP.

Figure 9. (right) Another OBL species *Eleocharis acuta* (sharp spike sedge), also a feature of the Northeast wetland in the OBDA.

Photos M. Ward 2025.



Edge Effect

Edge effect is referred to briefly yet not discussed in detail in the BlueGreen report. The definition of edge effect in a New Zealand forest context is “*The edges of areas of indigenous vegetation are where the impacts of surrounding land use are greatest and are where pests and weeds can invade and penetrate edges more easily. For a forest this is where light levels are higher and soil moisture and humidity are less. The edge effect can be seen most clearly where mature native forest adjoins pasture. Where a forest becomes highly fragmented (eg, by roads), the effective edge becomes proportionally larger relative to the intact core.* (MfE, 2017)”

- While a boundary fence line beneath a continuous canopy helps limit the movement of larger pest animals, smaller pests remain a threat. These animals can hinder forest regeneration by disrupting seed dispersal and preventing seedling establishment. This manifests as a 'hollow' or open forest structure, indicating that browsing pressure or other stressors have prevented the establishment of new plant generations.
- Areas directly exposed to farmland or road edges are subject to significant edge effects. In these zones, increased pest pressure and environmental stressors—such as desiccation—can penetrate 20–100m into the interior (Norton, 2002; Janssen, 2006).

Since livestock were removed in 1996 (GWRC, 2007), the OBDA has transitioned into a robust ecosystem with mostly intact edges. In parts the vegetation now features a nearly continuous canopy (see figure 10.) and strong margins particularly along the surrounding road and track networks. At present much of the Southern boundary of the BRP near the OBDA is buffered by the Winstone’s owned North-eastern section of the Northern Gully and the two already protected QEII covenants. The only exposed edge of the OBDA is that of the active quarry area to the South, also the highest elevation of the site. This exposed edge is approximately 380 metres and allows exposure to the Southerly winds as well as access by invasive weedy plant species. If the land exchange were to take place the exposed edge would increase to 5,000 metres (Appendix 1).

Constructing the OBDA would expose swamp maire specimens on the western edge to southerly winds. This increased exposure likely necessitates ongoing monitoring for damage and potential offset planting to compensate for any harm (NZTA, 2019).



Figure 10. Looking up at 100% native canopy in the OBDA gully headwater draining Southeast. The canopy featuring a very tall *Coprosma areolata* (thin-leaved coprosma) in the centre, mahoe mid-left and top right, *Pseudopanax crassifolia* (horoeaka, lancewood top left).

Photo M. Ward 2025.

OVERALL ASSESSMENT FLORA VALUES

DOC Give Site – **Moderate-High**

*Future DOC Give Site - **Moderate-High**

DOC Get Sites Overall – **Low-Moderate**

DOC Get Sites Overall (Not including QEII covenants)- **Low**

*Future DOC Get Sites Overall – **Moderate**

	Representativeness	Diversity & pattern	Rarity & distinctiveness	Ecological context (size, shape, connectivity, buffering)	Overall Indigenous Flora Value	Indigenous Flora values after 5-7 years if all proffered measures are successfully implemented
DOC Give site						
OBDA	Moderate	Moderate-High	High	Moderate	Moderate-High	Moderate-High
DOC Get sites						
Dry Creek	Low-Moderate	Low	Low	Low	Low	Low-Moderate
Firth Block (QEII)	Moderate	Low Moderate	Low	Moderate	Low Moderate	Low Moderate
Northern Gully non-QEII	Low-Moderate	Low	Low	Low	Low	Not assessed singularly
Northern Gully (QEII only)	Moderate	Moderate	Moderate	Moderate-High	Moderate	Not assessed singularly
Northern Gully whole	Moderate	Low-Moderate	Low-Moderate	Moderate	Low-Moderate	Moderate
Southern Gully	Low-Moderate	Moderate	Moderate	Low-Moderate	Low-Moderate	Moderate

Rankings: **Low / Low-Moderate / Moderate / Moderate-High / High**

***Future** = The sites into the future by 5-7 years if all the post land transfer improvements were realised, or in the case of the OBDA the continued ongoing work by GWRC is undertaken.

The following four criteria definitions as supplied as guidance were used to make the following assessments as concluded in the matrix above (expanded details Appendix 7):

Representativeness- The extent to which indigenous biodiversity is typical or characteristic of the natural diversity of the relevant Ecological District.

Diversity & Pattern- The extent to which the expected range of diversity and pattern of biological and physical components within the relevant ecological district is present

Rarity & Distinctiveness- The presence of rare or distinctive indigenous taxa, habitats of indigenous fauna, indigenous vegetation or ecosystems

Ecological Context- The extent to which the size, shape, and configuration of an area within the wider surrounding landscape contributes to its ability to maintain indigenous biodiversity or affects the ability of the surrounding landscape to maintain its indigenous biodiversity.

The OBDA- DOC Give		
Criterion	Ranking	Comments
Representativeness	Moderate	Belmont Regional Park (BRP) is located in the Wellington Ecological District (WED), in general the vegetation is described as remnants of originally widespread forests: podocarp forests (kahikatea, totara, matai) on hills... miro-rimu/tawa forest at higher levels; all these species present in remnant forests though podocarps have been logged out of many remnants (McEwan, 1987). The WED covers an area which has many types of habitats (see Appendix 2.), and therefore many indigenous plant species. In Singers <i>et. al.</i> (2018) page 27, they suggest the area would have originally been 'MF7 Tawa, Kamahi, podocarp forest regionally endangered 22% remaining'. - When directly compared to the plant list of the WED (Ward, 2026) which has 602 indigenous native plant species, the OBDA area has 111 species (Ward, 2025, Appendix 3.), this includes Woody species 49 (30% of WED); Ferns 38 (37%); Grasses/sedges/rushes 14 (13%); Herbs 10 (4%). - The floral vegetation is in recovery, naturally regenerating, after being an area farmed at low impact rates until 1996 (GWRC, 2007). This can be seen by the low percentage of palatable herbs and grass-like plant species recorded. Tall specimens are present particularly on the Southwestern section of the area (Figure 11). - The OBDA is regarded as 'Lowland broadleaf forest remains' within the BRP see Appendix 4 (GWRC,2007). There are several land cover types including a manuka/kanuka dominated block on the Eastern edge. The Southwestern edge also has the components of MF7 Tawa, Kamahi, podocarp forest regionally endangered 22% remaining (Singers <i>et. al.</i>, 2018).
Future Representativeness	Moderate	This area is part of the GWRC Dry Creek KNE, continued efforts to remove the woody weed species is evident with the removal of holly (Ilex aquifolium) in the west of the OBDA ((GWRC, 2023, pg 12), the area will likely improve in species richness as potential disturbance areas are repopulated by the adjacent richer BRP forest as well as allowing seedlings and saplings already present a chance to thrive with the change in resource regime. These improvements would likely be minimal in the short term 5-7 years as suggested
Diversity & Pattern	Moderate-High	- Approximately 1/3 of the OBDA area is retired pasture-land, and mature planted shelter trees, which is being re-colonised naturally by the native vegetation which surrounds it (see BlueGreen report Figure 4. Page 14). These transition zones allow seral species such as mahoe, red mapou, karamu, five-finger etc to establish, species normally associated with forest edge, high light margins. - The OBDA area has multiple gully sections (shown as waterways in figures 2 & 3), much of these gullies are in good health with an intact canopy of tree fern, the lack of weedy species can be seen in figure 12. The base of some gullies show evidence of regenerating 'WF8 Kahikatea, pukatea forest — Regionally critically endangered — 1% remaining' (Singers <i>et. al.</i>, 2018). The components are present and regenerating of note to this forest type is the <i>Syzygium maire</i> — swamp maire, a specialist obligate wetland species (Clarkson <i>et. al.</i>, 2021), and a typical part of a WF8 type forest. Apart from nearby along the western edge, this species is has not been found in any other part of the BRP¹. The evidence of these gully's being rare remnants can be seen in figures 1-3 as mentioned above. The presence of <i>Laurelia novaezeelandiae</i> — pukatea can also be seen mirroring the locations of the swamp maire, in the gullies, or nearby (see Appendix 7.). This type of forest regenerating along with the other specialist species recorded are good examples of wetland habitats, which are present in the shallow gullies throughout this area. The gullies are in good health with a canopy of tree fern; the lack of weedy species can be seen in figure 12. - The two gullies to the North-East (Figure 2 & 3) merge together, forming an open canopy wetland. This wetland sequence contains specimens which are obligate wetland and facultative wetland species as detailed above (Wetland Species, Page 6). - The higher elevated almost flat sections of this area are free-draining and support in at least one area dominated by manuka and broadleaf species such small-leaved <i>Coprosma</i>'s, red mapou, rewarewa, putaputawētā, pigeonwood etc., the area also has orchids amongst the undergrowth along with ground fern species and other herbs.

		Another section to the South-west of the area has steep slopes which dive into the continually flowing stream at their base, this area has evidence of the forest type 'MF 7: Tawa, Kamahi, podocarp forest – Regionally endangered – 22% remaining' (Singers <i>et. al.</i>, 2018). There are examples of mature hinau, rewarewa, tawa here, along with ramarama and tree-ferns. The diversity of habitat types spanning from wetlands to drier ridge-lands and weathered greywacke slopes demonstrates how these vibrant ecotones support a rich array of native species.
Future Diversity & Pattern	Moderate-High	The ongoing work undertaken within the area as part of the Dry Creek KNE Operational Plan by GWRC will continue to improve all facets of the various habitats present. The longer efforts are undertaken the more there is to be gained, not much will change in a short term of 5-7 years. Long term the whole area may revert back to native vegetation.
Rarity & Distinctiveness	High	- There are up to 20 species of the 111 natives present which prefer wetland habitat sequences. The most important being the Threatened Nationally Vulnerable tree species <i>Syzygium maire</i> – swamp maire an obligate wetland species. - Details are mentioned above – OBL 5 species; FACW 7 species; FAC 8 species. - Threatened- Nationally Critical species ramarama (<i>Lophomyrtus bullata</i>), is also present with the OBDA (see Figures 2 & 3, Appendix 3a). This species is also found in other locations within the BRP. - The OBDA is the headwaters of six minor tributaries, which flow into three unnamed creeks which then flow into the Hutt River.
Future Rarity & Distinctiveness	High	With the discovery of more Threatened – Nationally Vulnerable Swamp maire specimens, being within the OBDA which has occurred in association with this land transfer proposal. More efforts would be made by both GWRC and the Friends of Belmont Regional Park to propagate and re-enforce the specimens present so that the population is more robust and resilient over time, the habitat is proven to be suitable for this work to happen.
Ecological Context	Moderate	- The OBDA is part of the Dry Creek Key Native Ecosystem site (KNE) which is a section of (613 ha) of the BRP (GWRC, 2024). - The area with indigenous plant species present is well buffered on approximately 80 % of its outer margin, having a core mostly consisting of non-native species which are slowly being succeeded by regenerating native species as can be seen in the sequence of pictures on page 14 of the BlueGreen (2026) report. - The wetlands still present within the area are home to some Nationally and Regionally rare and endangered species not found in any other part of the BRP. The wetlands are in good condition and are not infested with invasive plant species (Figure 13). - The exposed Southern edge of the OBDA has the active quarry face as a border see figure 14.
Future Ecological Context	Moderate-High	Having a decent population of swamp maire present within the OBDA will continue to provide a seed source that may be transported by the visiting avifauna, making the wider area (where swampy) potential sites for further spread of the species. The ongoing pest animal management in the area (GWRC, 2023, pg. 24) will continue to allow more seedlings to survive as is evident with this area already having a considerably higher percentage of native flora species than those areas outside the BRP.

¹ After discussions with GWRC staff and volunteers who administer the BRP, e.g. technical staff, rangers, pest control, volunteer groups, no other specimens are known other than those directly to the west of the proposed OBDA area; In herbaria there are no records, the nearest on this side of the Hutt Valley being a 1986 record in the Keith George Park (SP078570); InaturalistNZ has no records other than those in the area of assessment, the closest being in Bertrams Reserve, Belmont.



Figure 11. A view upwards of a mature *Elaeocarpus dentata* (Hinai) canopy specimen.

Photo M. Ward 2025.



Figure 12. The *Dicksonia squarrosa* (wheki, tree fern) cover low energy gully weed free.

Photo M. Ward 2025.



Figure 13. A wetland amongst the native regenerating forest of the OBDA, FACW species *Carex geminata* and *Parablechnum minus* feature centrally here.

Photo M. Ward 2025.



Figure 14. The southern edge of the OBDA, the working face of the quarry.

Photo M. Ward 2025.

DRY CREEK – DOC Get		
Criterion	Ranking	Comments
Representativeness	Low-moderate	- Visited briefly, this area is the source of several weed problems faced by the management of the BRP, in particular, <i>Cortaderia selloana</i> (Pampas grass). The entire central area of this block (not offered as exchange) needs critical weed control undertaken as a considerate neighbour to the BRP, some of these weedy featured a shown in figure 15. - When directly compared to the plant list of the WED (Ward, 2026) which has 602 native plant species, the DRY CREEK area has 48 (8% of WED) native species (BlueGreen, 2026), they include Woody species 26 (16% of WED); Ferns 18 (17%); Grasses/sedges/rushes 1 (0.9%); Herbs 3 (1.3%). - I mostly agree with the assessments made in the Blue Green Report.
Future Representativeness	Moderate	With successful weed species removal/control this area may naturally reinvigorate in time, this would take longer than the suggested time frame for management of 5-7 years, more likely results would be obvious after 25 years, once canopy has formed and natural regeneration occurs.
Diversity & Pattern	Low	I agree with the assessments made in the BlueGreen Report.
Future Diversity & Pattern	Low-moderate	There are a range of habitats present in this area including riparian habitat and slope habitat. The riparian margins may improve with the removal of weed species, and the source from which they continue to reinvade, these habitats will improve in diversity in the long term.
Rarity & Distinctiveness	Low	I agree with the assessments made in the BlueGreen Report.
Future Rarity & Distinctiveness	Low	The proposed improvements will yield negligible benefits regarding this criterion.
Ecological Context	Low	- I agree with the assessments made in the BlueGreen Report. - If this area were to be exchanged it would create an expensive liability for the management of the BRP, at present it is a buffer from the central weedy zone see figure 16.
Future Ecological Context	Moderate	After the removal of the weed species from this area, it will take time for the native species to recalibrate. This would eventually allow the vegetation to 'catch up' with the encompassing BRP which has pest plant and pest animal work already ongoing by GWRC as part of the Dry Greek KNE Operational Plan.



Figure 15. From central area looking Northeast, shows concerning pest plant species, *Ulex europaeus* (gorse), *Buddleja davidii* (buddleia), in the foreground, with a whole slope of *Erica lusitanica* (Spanish heath) in flower in the background left.

Photo M. Ward 2025.



Figure 16. From central area looking Southwest, shows concerning pest plant species, *Cytisus scoparius* (broom) and *Cortaderia selloana* (pampas grass), in the foreground, the slope beyond covered with an assortment of gorse, buddleia, pampas grass, Spanish heath and *Leycesteria formosa* (Himalayan honeysuckle), all of which are problematic and require complete eradication.

Photo M. Ward 2025.

FIRTH BLOCK QEII covenant – DOC Get		
Criterion	Ranking	Comments
Representativeness	Moderate	- When directly compared to the plant list of the WED (Ward, 2026) which has 602 native plant species, the FIRTH BLOCK area has 57 (9.5% of WED) native species (BlueGreen, 2026), they include Woody species 33 (20% of WED); Ferns 18 (17%); Grasses/sedges/rushes 2 (1.8%); Herbs 4 (1.7%). - This area is a regenerating ex-quarry face. Much of the area is therefore inaccessible.
Future Representativeness	Moderate	The proposed improvements will yield negligible benefits regarding this criterion.
Diversity & Pattern	Low Moderate	I agree with the assessments made in the BlueGreen Report.
Future Diversity & Pattern	Low	The proposed improvements will yield negligible benefits regarding this criterion.
Rarity & Distinctiveness	Low	I agree with the assessments made in the BlueGreen Report.
Future Rarity & Distinctiveness	Low	The proposed improvements will yield negligible benefits regarding this criterion.
Ecological Context	Moderate	- I agree with the assessments made in the BlueGreen Report. - This area is already protected by QEII covenant and is directly adjacent to the BRP providing at least one edge with integrity.
Future Ecological Context	Moderate	The proposed improvements will yield negligible benefits regarding this criterion; they may prevent damage from the edge effect of the exposed quarry face boundary.

NORTHERN GULLY SYSTEM (Not Including QEII covenant) – DOC Get		
Criterion	Ranking	Comments
Representativeness	Low-Moderate	- When directly compared to the plant list of the WED (Ward, 2026) which has 602 native plant species, the NORTHERN GULLY SYSTEM area has a total of 31 (5.1%) native species (Appendix 5), this includes Woody species 19 (11% of WED); Ferns 11 (9%); Grasses/sedges/rushes 1 (0.9%); Herbs 0 (0%). - The North-eastern section of the area has somewhat similar mature forest to the QEII Covenant yet lacks in the species diversity. The central watercourse appears to have been channelled as it heads toward a culvert, which heads in the direction of the active quarry area. There also appears to be a dumping area below the canopy of the North-eastern tributary closest to the OBDA (Figure 17 & 18.). - The Western section of the area (South of the covenant) is majority low value reshaped, replanted overburden area. The canopy is mahoe with eroded substrate exposing large grade greywacke like a scree slope (Figure 19.).
Diversity & Pattern	Low	- I agree with most of the assessments made in the Blue Green Report. - There is a large proportion of reshaped and replanted areas which detract from the overall value and natural features present.
Rarity & Distinctiveness	Low	I agree with the assessments made in the BlueGreen Report.
Ecological Context	Low	- I agree with most of the assessments made in the Blue Green Report. - The area has too many modifications to accurately represent natural sequences of vegetation or landform. This area is overall, of low value.



Figure 17 & 18. This area below the canopy in the easternmost tributary West of the operational quarry area looks to have been an old dumping site with 44-gallon drums, mesh, corrugated iron and concrete footing dispersed over an area of an area of 100 square metres. Much of the rusting metal was in the stream. This needs to be remedied. Photo M. Ward 2026.





Figure 19. The understory of the replanted overburden area of the Northern Gully system, canopy of *Melicytus ramiflorus* (mahoe), with scree-like substrate below.

Photo M. Ward 2026.

NORTHERN GULLY SYSTEM (QEII covenant) – DOC Get		
Criterion	Ranking	Comments
Representativeness	Moderate	- When directly compared to the plant list of the WED (Ward, 2026) which has 602 native plant species, the NORTHERN GULLY SYSTEM QEII COVENANT area has a total of 55 (9.1% of WED) native species (Appendix 5), this includes Woody species 34 (20% of WED); Ferns 18 (17%); Grasses/sedges/rushes 2 (1.8%); Herbs 1 (0.4%). I imagine this number of species would improve with more time spent searching. - The QEII covenanted area is 3.6ha (Appendix 6) of the total 12.62ha, representing approximately quarter of the area not half (6ha) as suggested in the BlueGreen report (page 30 6.1.1 first paragraph), this part of the Northern Gully System contains some quality forest including mature Pukatea, Miro and Tawa shown in figure 20. Unfortunately, the understorey is hollow due to recruitment failure, pest management is required. The same forest type and age is contiguous into the BRP (some of which is included in the OBDA). - Just over ¼ of the covenant is low value reshaped, replanted overburden area.
Diversity & Pattern	Moderate	- The area has a south facing slope, stream bed and north facing slope, the latter being an older reshaped overburden planted area. - The area has a section of Tawa dominated forest type (see Figure 21.) which is consistent with the neighbouring BRP, and a largely typical type of forest for the WED. Often this type of forest is seen in lowland terraces in the WED. If the area was larger there may be more biodiversity to consider.
Rarity & Distinctiveness	Moderate	Despite the presence of some podocarp species, they do not feature in high numbers or as complete in age profile from seedlings to sapling to mature.
Ecological Context	Moderate-high	- The area has three profiles of note which affect the vegetation. - The former overburden section is about 30% and of low value. - The lowest section represents about 25% of the covenant and is relatively intact stream, with good riparian vegetation and settled stream edges. - The upper section about 45% which abuts the BRP, is a continuation of the relatively mature vegetation across the fence providing canopy, epiphytes and some recovering understorey. - The area is not exposed to any open-air edges, having forested private property to the west (see figure 22), the forested DOC-owned BRP to the North, and the Winstone's quarry land to the East and South.



Figure 20. Looking from North from the top of the former overburden (foreground) area towards the NW QEII covenanted area (middle ground). The canopy can be seen to have good structure made of mature forest species such as *Beilschmiedia tawa* (tawa), *Dacrycarpus dacrydioides* (kahikatea), *Pectinopitys ferruginea* (Miro), and *Knightia excelsa* (rewarewa). Photo M. Ward 2025.



Figure 21. Looking South across the top of the Northern Gully QEII block. The foreground vegetation is still part of the BRP, whereas the middle-ground golden green coloured vegetation is the Tawa dominated forest canopy of the covenant, with the top of the former overburden area beyond.

Photo M. Ward 2026.



Figure 22. Looking West across the boundary from the stream bed at the base of the QEII covenant within the Northern Gully system. Beyond the fence is private property with contiguous similar aged forest. Photo M. Ward 2026.

FUTURE NORTHERN GULLY SYSTEM (including QEII covenant) - DOC Get		
Criterion	Ranking	Comments
Future Representativeness	Moderate	In the relative short term, the proposed improvements will yield negligible benefits regarding this criterion.
Future Diversity & Pattern	Moderate	The area will improve with the eradication of pest plants and animals. The seeds would likely have a better chance of being dispersed by natural vectors, without predation. Additional habitat opened up with the removal of pest plants will improve the robustness of the area and allow spread of native species. This may result in a noticeable improvement in seedling and sapling survival therefore an improvement in recruitment.
Future Rarity & Distinctiveness	Low-Moderate	In the relative short term, the proposed improvements will yield negligible benefits regarding this criterion.
Future Ecological Context	Moderate	The area will improve with the eradication of pest plants and animals. The seeds would likely have a better chance of being dispersed by natural vectors, without predation, increasing its value as a seed source.

SOUTHERN GULLY		
Criterion	Ranking	Comments
Representativeness	Low-Moderate	- The BlueGreen report does not contain a botanical list for this area. - During my 19/3/26 visit I recorded the plants in the area. The botanical list is attached as Appendix 5. Only plants deemed natural are directly compared to the datum WED list. - When directly compared to the plant list of the WED (Ward, 2026) which has 602 native plant species, the SOUTHERN GULLY area has 33 (5.5% of WED) native species, they include Woody species 17 (10% of WED); Ferns 14 (13.7%); Grasses/sedges/rushes 2 (1.8%); Herbs 0 (0%). - The area has a central wetland which has been planted and now overrun by blackberry in large parts (See figure 23). It appears that Winstone's has started to attempt to remove some of the gorse and blackberry in the wetland area and on the western bank see figures 24-26.
Future Representativeness	Moderate	If the wetland area has the weeds removed successfully the area will likely measurably improve in quality. It would allow new species establishment, and other already present the chance to thrive.
Diversity & Pattern	Moderate	There are two types of ecosystem present in the area, wetland and regenerating forest.
Future Diversity & Pattern	Moderate	The successful introduction of another native species would improve the diversity of the area slightly. A measurable change in the ecotones of may not be realised to a measurable level in the time span suggested, in the longer term e.g. 25 years this would be more noticeable.
Rarity & Distinctiveness	Moderate	- The Western edge bordering farmland is gorse regenerated bush, referred to in the BlueGreen report as 'seral' vegetation (see figure 27). - When observing the central wetland area overtime on GoogleEarth, the area appears to have been reduced to bare agricultural land until relatively recently, suggesting the <i>Carex geminata</i> may be the only likely remnant indigenous plant species found within. - Healthy remnant wetlands in the WED are diverse in biodiversity this area is not.
Future Rarity & Distinctiveness	Moderate	The suggested transfer of the 9 mature swamp maire specimens from the OBDA to this site is not likely to succeed due to the fragile ecology of the species. There is no precedent for this methodology, every expert consulted concurs. Therefore, offset mitigation planting needs to be considered. The suggestion of 200 swamp maire being planted in this site is a good start, the numbers do not reflect a recently accepted rate as was implemented by the NZTA in 2019. This is a rate of 200:1 at a success rate of 90%, suggesting the number of swamp maire plants needing to be planted and survive in this site or like being 1620 ($9 \times 200 \times 90\% = 1620$). If the suggested establishment of swamp maire in this area proves successful, the resulting improvements will be clearly noticeable. Due to the numbers suggested by DOC as per NZTA 2019 page 11, are vastly different to

		those suggested by Winstones's. We acknowledge that the requirement of growing and planting 1800 swamp maire specimens at a size of PB2 may take time so this may also be difficult to achieve in the suggested 7 years of post-transfer care suggested. The addition of a rare species by planting it is not a feature that can be considered as naturally occurring, this may change in the long term if the species then spreads naturally within the site.
Ecological Context	Low-Moderate	• The Southern Gully is triangular, bordered by privately owned farmland to the West, a privately owned farmland with bush to the Southeast, and the quarry land to the Northeast. This area at 3.94ha (Table 12 pg. 80, BlueGreen 2026) is susceptible to edge effect and will require continual maintenance. • The wetland present is not particularly natural, lacking original or naturally regenerating vegetation. • The regenerating edges around the wetland are a mixture of early stage and planted vegetation.
Future Ecological Context	Low-Moderate	With the weed care suggested in this area being successful, some evidence of natural buffering may occur to naturally increase the buffering resilience of the edge effect this block is pressured by. If the area was to remain weed-free in the long-term (25 years) it would be measurably improved.



Figure 23. Looking North from the central wetland area. Dense blackberry in the foreground with planted specimens of *Cordyline australis* (ti kouka, cabbage tree), *Hoheria sextylosa* (houheria), *Plagianthus regius* ssp. *regius* (mānātu, ribbonwood), in the middle ground and mahoe directly beyond.

Photo M. Ward 2026.



Figure 24. Looking South from the central wetland area, the central water way is visible amid the blackberry. Dense blackberry looks to have been scrub-barred to attempt to control it. Very likely this will regrow as blackberry is a very difficult weed species to control without herbicide, as the root crowns resprout readily.

Photo M. Ward 2026.



Figure 25. Looking East from the western bank seen in figure 20. This looks to be a raft of gorse stems being used so that the area in figure 20 could have the material removed from site to make it look tidier, not bad practice as it prevents stem coppicing back into the substrate.
Photo M. Ward 2026.



Figure 26. Looking West from location in figure 19. This looks to have been a gorse blackberry infestation which has been cut and removed for the most part. Like the area in figure 18 it is very likely this area will regrow as blackberry is a very difficult weed species to control without herbicide, as the root crowns resprout readily.
Photo M. Ward 2026.



Figure 27. Looking East from the western bank above northern end of central wetland. Mahoe on the left gorse in the central area, and a mixture of *Dicksonia squarrosa* (wheki, tree fern) and mahoe, in the central background and to the left is reshaped replanted form of the earlier overburden area.

Photo M. Ward 2026.

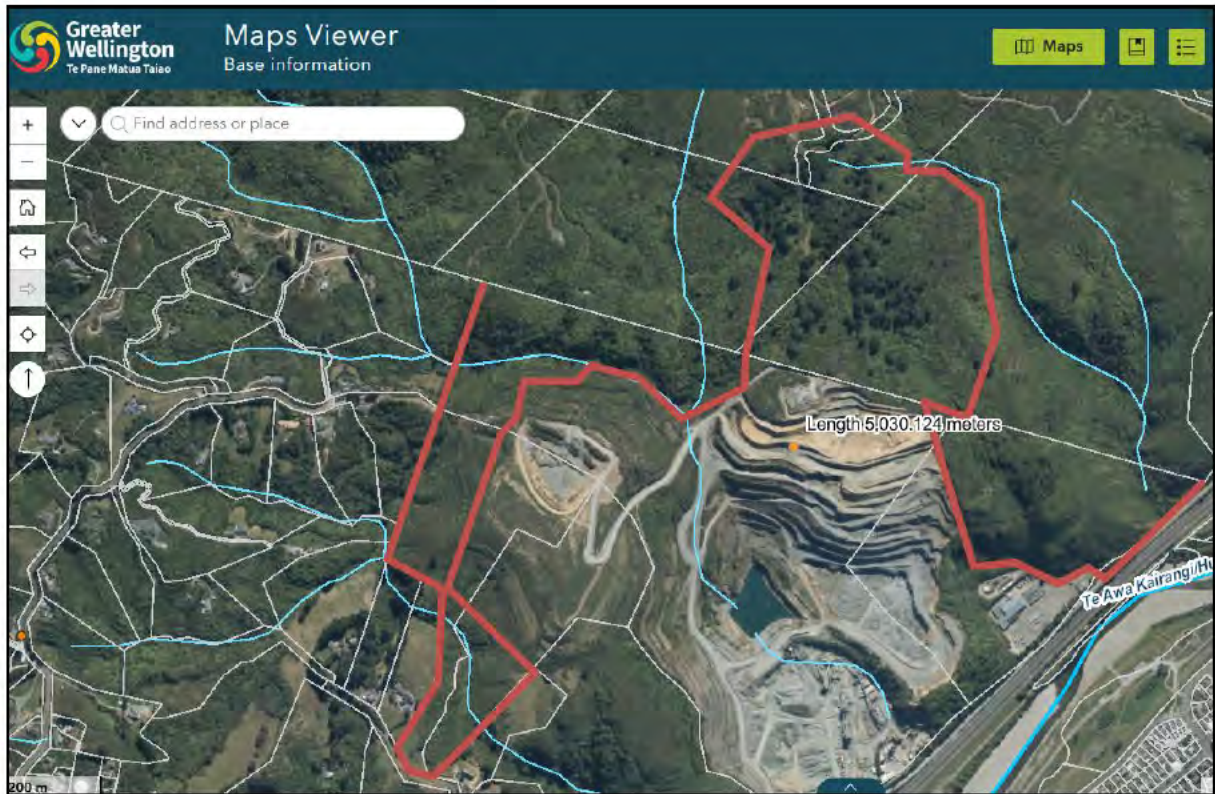
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APPENDICES

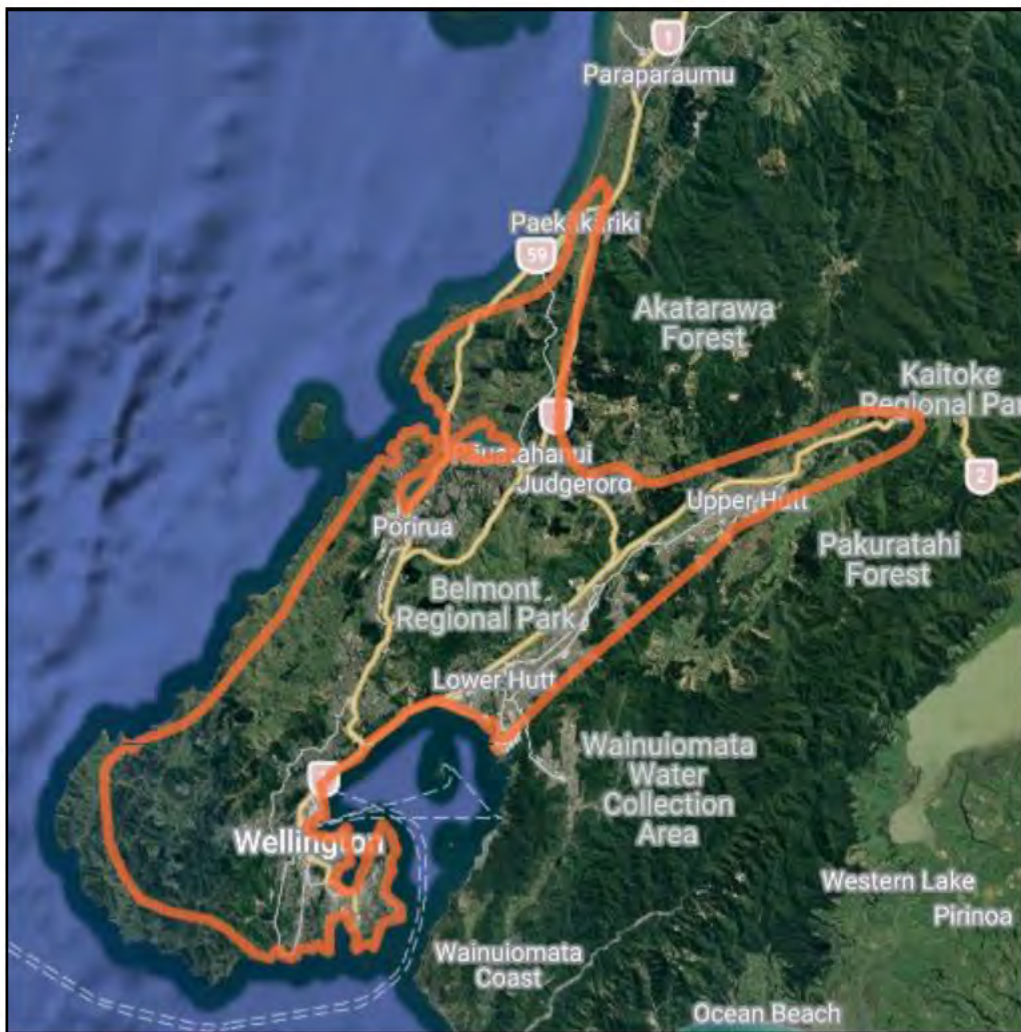
Appendix 1. Potential Edge Effect border.



Red line shows the border if the land exchange was to take place. A border of 5,000 metres. Source GWRC draw function on Maps Viewer.

<https://experience.arcgis.com/experience/8ca4cb5241604ee0a981935b9be3fd4c/page/Base-Information>

Appendix 2. The Wellington Ecological District (WED).



A representative image from Sawyer (2001). Note BRP in centre of the image.

Appendix 3. Botanical list for an area of Belmont Regional Park (The OBDA). Recorded by Matt Ward during three visits in September 2025.

NATIVE

PODOCARPS

<i>Dacrycarpus dacrydioides</i>	kahikatea
<i>Dacrydium cupressinum</i>	rimu
<i>Pectinopitys ferruginea</i>	miro

MONOCOT TREES

<i>Cordyline australis</i>	ti kouka
<i>Rhopalostylis sapida</i>	nikau

TREES

<i>Aristotelia serrata</i>	makomako
<i>Beilschmiedia tawa</i>	tawa
<i>Brachyglottis repanda</i>	rangiora
<i>Carpodetus serratus</i>	putaputawētā
<i>Coprosma areolata</i> (including a specimen 10m)	
<i>Coprosma autumnalis</i>	kanono
<i>Coprosma rhamnoides</i>	
<i>Coprosma robusta</i>	karamū
<i>Coprosma rubra</i>	
<i>Corynocarpus laevigatus</i>	karaka
<i>Elaeocarpus dentatus</i> var. <i>dentatus</i>	hinau
<i>Geniostoma ligustrifolium</i> var. <i>ligustrifolium</i>	hangehange
<i>Hedycarya arborea</i>	porokaiwhiri
<i>Knightia excelsa</i>	rewarewa
<i>Kunzea robusta</i>	rawirinui, kānuka
<i>Laurelia novae-zelandiae</i>	pukatea
<i>Leptospermum scoparium</i> var. <i>scoparium</i>	mānuka
<i>Leucopogon fasciculatus</i>	tall mingimingi
<i>Lophomyrtus bullata</i> (no Myrtle rust noted)	ramarama
<i>Melicytus ramiflorus</i> ssp. <i>ramiflorus</i>	māhoe
<i>Myrsine australis</i>	mapau
<i>Olearia rani</i> var. <i>colorata</i>	heketara
<i>Pennantia corymbosa</i>	kaikōmako
<i>Piper excelsum</i> ssp. <i>excelsum</i>	kawakawa
<i>Pseudopanax arboreus</i>	whauwhaupaku
<i>Pseudopanax crassifolius</i>	horoeka
<i>Pterophylla racemosa</i>	kāmahi
<i>Knightia excelsa</i> (seedlings only)	rewarewa
<i>Schefflera digitata</i>	patē
<i>Solanum laciniatum</i>	poroporo
<i>Syzygium maire</i> (no Myrtle rust noted)	maire tawake, waiwaka
<i>Veronica stricta</i> var. <i>stricta</i>	koromiko

FERNS & ALLIES

<i>Alsophila dealbata</i>	ponga
<i>Alsophila smithii</i>	kātote
<i>Asplenium bulbiferum</i>	pikopiko
<i>Asplenium gracillimum</i>	hen & chicken fern
<i>Asplenium flaccidum</i>	hanging spleenwort
<i>Asplenium oblongifolium</i>	huruhuruwhenua
<i>Asplenium polyodon</i>	sickle spleenwort
<i>Austroblechnum lanceolatum</i>	nini, rereti
<i>Austroblechnum membranaceum</i>	
<i>Cranfillia fluviatilis</i>	kiwikiwi, kiwakiwa
<i>Dendroconche scandens</i>	mokimoki
<i>Dicksonia squarrosa</i>	wheki
<i>Histiopteris incisa</i>	mātātā
<i>Hymenophyllum bivalve</i>	filmy fern
<i>Hymenophyllum dilatatum</i>	matua mauku
<i>Hymenophyllum flabellatum</i>	filmy fern
<i>Icarus filiformis</i>	climbing hard fern
<i>Lastreopsis hispida</i>	hairy fern
<i>Leptopteris hymenophylloides</i>	heruheru
<i>Lomaria discolor</i>	petipeti, piupiu
<i>Notogrammitis billardiarei</i>	common strap fern
<i>Paesia scaberula</i>	lace fern
<i>Pakau pennigera</i>	piupiu
<i>Parablechnum minus</i>	swamp kiokio
<i>Parablechnum novae-zelandiae</i>	kiokio, horokio
<i>Parapolystichum glabellum</i>	smooth shield fern
<i>Pellaea rotundifolia</i>	round-leaved fern
<i>Polyphlebium venosum</i>	veined filmy fern
<i>Polystichum neozelandicum</i> ssp. <i>zerophyllum</i>	shield fern
<i>Polystichum vestitum</i>	pūniu
<i>Pseudodiphasium volubile</i>	waewaekoukou
<i>Pteridium esculentum</i>	rarauhe
<i>Pteris macilenta</i>	sweet fern
<i>Pteris tremula</i>	shaking brake
<i>Rumohra adiantiformis</i>	leathery shield fern
<i>Sphaeropteris medullaris</i>	mamaku
<i>Tmesipteris elongata</i>	fork fern
<i>Zealandia pustulata</i> ssp. <i>pustulata</i>	kōwaowao, pāraharaha
VINES	
<i>Clematis forsteri</i>	Forster's clematis
<i>Clematis paniculata</i>	puawananga
<i>Freycinetia banksii</i>	kiekie
<i>Metrosideros diffusa</i>	white rātā
<i>Metrosideros fulgens</i>	climbing rātā

<i>Metrosideros perforata</i>	akatea
<i>Muehlenbeckia australis</i>	pōhuehue
<i>Parsonsia capsularis</i> var. <i>capsularis</i>	NZ jasmine
<i>Parsonsia heterophylla</i>	NZ jasmine
<i>Passiflora tetrandra</i>	kohia
<i>Ripogonum scandens</i>	kareao, pirita
<i>Rubus cissoides</i>	tātārāmoa
GRASSES	
<i>Austroderia fulvida</i>	kakaho
SEDGES	
<i>Carex banksiana</i>	fine-leaved bastard grass
<i>Carex dissita</i>	forest sedge
<i>Carex forsteri</i>	Forster's sedge
<i>Carex geminata</i>	rautahi
<i>Carex lessoniana</i>	rautahi
<i>Carex maorica</i>	Māori sedge
<i>Carex megalepis</i>	caver's beard
<i>Carex secta</i>	purei, pukio
<i>Carex uncinata</i>	amu, matau-a-maui
<i>Carex virgata</i>	pukio, toito
<i>Eleocharis acuta</i>	sharp spike sedge
<i>Isolepis inundata</i>	
<i>Schoenus maschalinus</i>	dwarf bog rush
ORCHIDS	
<i>Caladenia</i> sp.	
<i>Microtis unifolia</i>	onion-leaved orchid
<i>Pterostylis alobula</i>	greenhood
<i>Pterostylis banksii</i>	tutukiwi
<i>Pterostylis graminea</i>	
<i>Pterostylis</i> sp.	
HERBS	
<i>Cardamine corymbosa</i>	
<i>Centella uniflora</i>	centella
<i>Hydrocotyle moschata</i> var. <i>moschata</i>	hairy pennywort
<i>Stellaria parviflora</i>	NZ chickweed
EXOTICS	
GYMNOSPERMS	
<i>Hesperocyparis macrocarpa</i>	macrocarpa
<i>Pinus radiata</i>	radiata pine
TREES	
<i>Berberis glaucocarpa</i>	barberry
<i>Cytisus scoparius</i>	wild broom
<i>Ilex aquifolium</i>	holly
<i>Leycesteria formosa</i>	Himalayan honeysuckle

<i>Ulex europaeus</i>	gorse
VINES	
<i>Clematis vitalba</i>	old man's beard
GRASSES	
<i>Dactylis glomerata</i>	cocksfoot
<i>Ehrharta erecta</i>	veldt grass
RUSHES	
<i>Juncus effusus</i>	soft rush
HERBS	
<i>Cirsium arvense</i>	Californian thistle
<i>Cirsium vulgare</i>	Scotch thistle
<i>Lotus pedunculatus</i>	lotus
<i>Plantago lanceolata</i>	narrow-leaved plantain
<i>Rumex acetosella</i>	sheep's sorrel
<i>Rumex obtusifolius</i>	broad-leaved dock
<i>Ranunculus repens</i>	buttercup
<i>Solanum chenopodioides</i>	velvety nightshade
<i>Trifolium repens</i>	white clover

Appendix 3a. Botanical list of notable species including locations of rare and endangered species for an area of Belmont Regional Park (The OBDA). Recorded by Matt Ward during three visits in September 2025.

RARE AND ENDANGERED PLANTS PRESENT		
Species	National	Regional
<i>Carex maorica</i>	Not Threatened	Regionally- Uncommon
<i>Coprosma rubra</i>	At Risk- Declining	Regionally- Uncommon
<i>Lophomyrtus bullata</i>	Threatened – Nationally Critical	Regionally- Critical
<i>Syzygium maire</i>	Threatened – Nationally Vulnerable	Regionally- Vulnerable

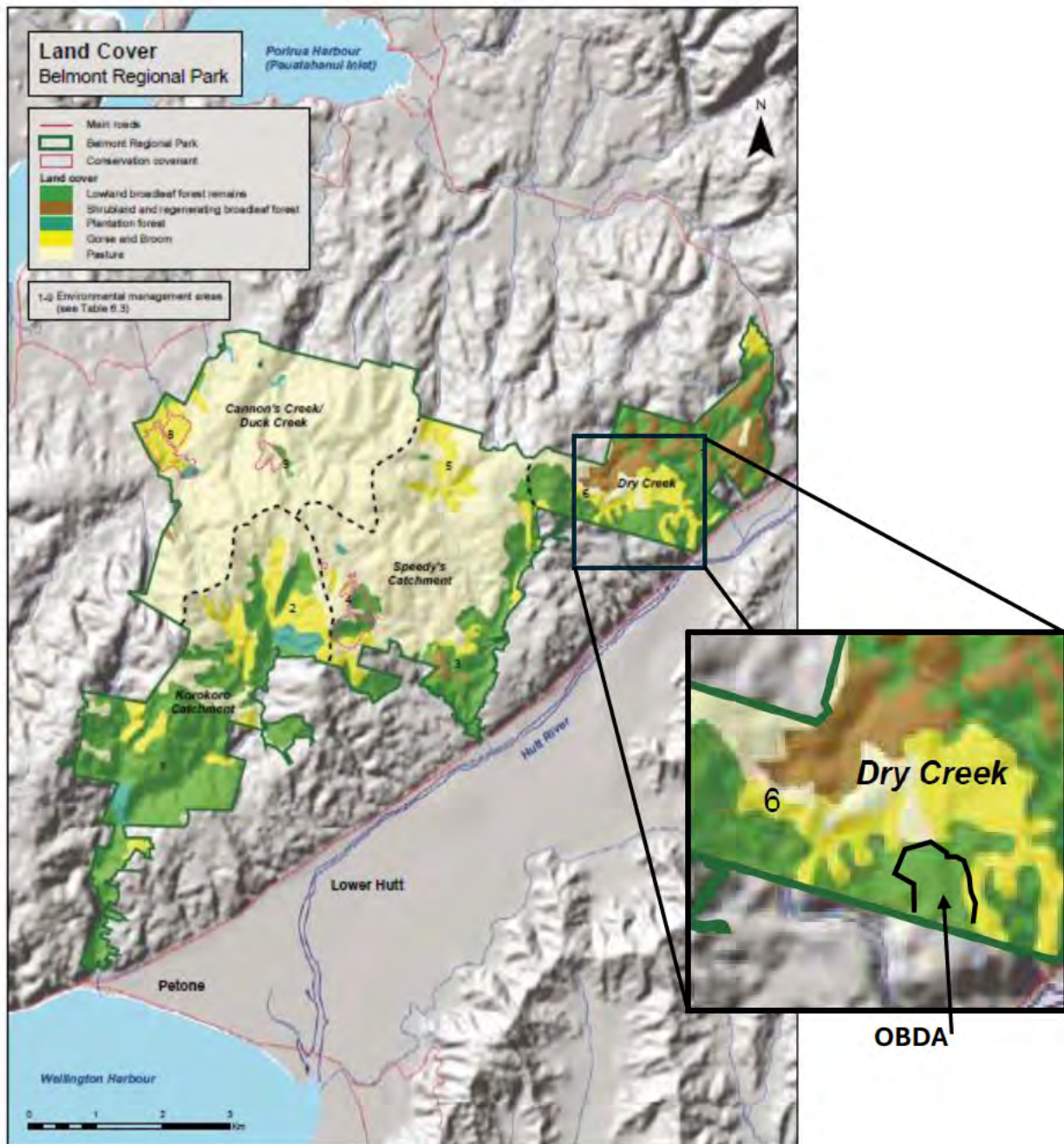
<i>Syzygium maire</i>		
SM1	41°09'33.2"S 174°57'16.6"E WGS84 1763994.392 - 5441725.137 NZTM	2 specimens, 7m high.
SM2	41°09'43.5"S 174°57'30.2"E WGS84 1764304.224 - 5441400.370 NZTM	2 mature specimens, 12m & 3m; 25 seedlings
SM3	41°09'44.4"S 174°57'31.3"E WGS84 1764329.236 - 5441372.037 NZTM	1 specimen, 6m
SM4	41°09'35.5"S 174°57'30.4"E WGS84 1764314.436 - 5441646.978 NZTM	1 specimen, 5m high; 20 seedlings
SM5	41°09'32.3"S 174°57'29.7"E WGS84 1764300.341 - 5441746.030 NZTM	1 mature specimen, 12m high; 20 seedlings
SM6	41°09'42.3"S 174°57'20.5"E WGS84 1764078.986 - 5441442.459 NZTM	1 mature specimen, 6m high.
SM7	41°09'39.2"S 174°57'23.0"E WGS84 1764139.400 - 5441536.751 NZTM	1 mature specimen, 9 m high.

<i>Lophomyrtus bullata</i>		
LB1	41°09'42.2"S 174°57'29.4"E WGS84 1764286.481 - 5441440.880 NZTM	1 specimen, 3m high
LB2	41°09'42.9"S 174°57'29.0"E WGS84 1764276.672 - 5441419.502 NZTM	2 specimens, 2m & 0.25m
LB3	41°09'43.1"S 174°57'29.8"E WGS84 1764295.179 - 5441412.915 NZTM	2 specimens, 4m & 5m
LB4	41°09'44.1"S 174°57'31.1"E WGS84 1764324.783 - 5441381.394 NZTM	1 specimen, 3m
LB5	41°09'47.1"S 174°57'33.9"E WGS84 1764387.957 - 5441287.408 NZTM	6 saplings, 0.1-0.5m
LB6	41°09'44.4"S 174°57'16.2"E WGS84 1763977.314 - 5441379.948 NZTM	1 specimen, 5m.
LB7	41°09'44.1"S 174°57'16.7"E WGS84 1763989.175 - 5441388.938 NZTM	2 specimens, both 2m.
LB8	41°09'43.6"S 174°57'16.7"E WGS84 1763989.521 - 5441404.357 NZTM	2 specimens, both 2.5m
LB9	41°09'43.4"S 174°57'17.6"E WGS84 1764010.635 - 5441410.054 NZTM	4 specimens, from 1.8-3m
LB10	41°09'43.2"S 174°57'18.4"E WGS84 1764029.419 - 5441415.803 NZTM	1 specimen, 4m
LB11	41°09'42.2"S 174°57'20.0"E WGS84 1764067.402 - 5441445.805 NZTM	1 specimen, 4m
<i>Coprosma rubra</i>		
CR1	41°09'35.5"S 174°57'30.6"E WGS84 1764319.097 - 5441646.873 NZTM	1 specimen, 1.8m high
<i>Carex maorica</i>		
CM1	41°09'36.7"S 174°57'31.2"E WGS84 1764332.249 - 5441609.551 NZTM	5 specimens, possibly more

SM1	https://maps.app.goo.gl/RSuFSFKKzoW1eaKN9?g_st=am
SM2	https://maps.app.goo.gl/LKAqgFE5hEohKdiB9?g_st=am
SM3	https://maps.app.goo.gl/Ay9WrjNRK1HDSGOq7?g_st=am
SM4	https://maps.app.goo.gl/cJPFXnorA9TFg6VT8?g_st=am
SM5	https://maps.app.goo.gl/NZz12AK5UHrReQPv8?g_st=am
SM6	https://maps.app.goo.gl/g3u6HpAeodWqCnHA7?g_st=am
SM7	https://maps.app.goo.gl/qwVqjqV8epsiFTtN9?g_st=am
LB1	https://maps.app.goo.gl/jxWwmWoLvYHvuMLj6?g_st=am
LB2	https://maps.app.goo.gl/Go7GqxnEf45KuNhb6?g_st=am
LB3	https://maps.app.goo.gl/WBqZVBdAkSNSHmQ59?g_st=am
LB4	https://maps.app.goo.gl/wwwcYM5Z9PSNahpWF6?g_st=am
LB5	https://maps.app.goo.gl/1LJaPPYCTvBzgizH8?g_st=am
LB6	https://maps.app.goo.gl/xqvYMGPZnCx8zfdF7?g_st=am
LB7	https://maps.app.goo.gl/Ja4gjHts4e1gWtAf8?g_st=am
LB8	https://maps.app.goo.gl/AKJTNSRwMirK7B8C9?g_st=am
LB9	https://maps.app.goo.gl/FiCfMMe15VrDzsqv9?g_st=am
LB10	https://maps.app.goo.gl/1X1BiQ3ZyGmVLapy7?g_st=am
LB11	https://maps.app.goo.gl/dcxrdWZiSttPcqEEA?g_st=am
CR1	https://maps.app.goo.gl/6xG7KxQfGxb5XVB49?g_st=am
CM1	https://maps.app.goo.gl/EzQgmCAC66LRiPh6?g_st=am

Appendix 4. Land Covers and SNA of the Belmont Regional Park – Resource Statement- Greater Wellington Regional Council

Map 8, Page 54, This broad scale assessment by GWRC shows that prior to this report being created the existence of the regenerating Pukatea, Kahikatea forest was largely not known. The inset shows at the time of this report the area is suggested merely as Lowland Broadleaf Forest.



Appendix 5. Botanical lists for Winstone's areas without details provided in the BlueGreen report.

Botanical lists for Winstone's areas as recorded 19/3/26

NORTHERN GULLY (QEII Covenant)

NATIVE 34woody 18ferns 2sedges 1herb

PODOCARPS

<i>Dacrycarpus dacrydioides</i>	<i>kahikatea</i>
<i>Pectinopitys ferruginea</i>	miro
<i>Podocarpus totara</i> var. <i>totara</i>	tōtara

MONOCOT TREES

<i>Rhopalostylis sapida</i>	nikau
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TREES

<i>Alectryon excelsus</i> subsp. <i>excelsus</i>	tītoki
<i>Aristotelia serrata</i>	makomako
<i>Beilschmiedia tawa</i>	tawa
<i>Brachyglottis repanda</i>	rangiora
<i>Carpodetus serratus</i>	putaputawētā
<i>Coprosma autumnalis</i>	kanono
<i>Coprosma lucida</i>	karamū
<i>Corynocarpus laevigatus</i>	karaka
<i>Didymocheton spectabilis</i>	kohekohe
<i>Geniostoma ligustrifolium</i> var. <i>ligustrifolium</i>	hangehange
<i>Hedycarya arborea</i>	porokaiwhiri
<i>Knightia excelsa</i>	rewarewa
<i>Kunzea robusta</i>	kānuka
<i>Laurelia novae-zelandiae</i>	pukatea
<i>Lophomyrtus bullata</i> (no Myrtle rust noted)	ramarama
<i>Melicytus ramiflorus</i> ssp. <i>ramiflorus</i>	māhoe
<i>Myrsine australis</i>	mapau
<i>Olearia rani</i> var. <i>colorata</i>	heketara
<i>Piper excelsum</i> ssp. <i>excelsum</i>	kawakawa
<i>Pittosporum tenuifolium</i>	kōhūhū, kōwhiwhi
<i>Pseudopanax arboreus</i>	whauwhaupaku
<i>Pseudopanax crassifolius</i>	horoeka
<i>Pseudowintera axillaris</i>	<i>horopito</i>
<i>Pterophylla racemosa</i>	kāmahi
<i>Schefflera digitata</i>	patē
FERNS & ALLIES	
<i>Alsophila dealbata</i>	ponga
<i>Asplenium gracillimum</i>	hen & chicken fern
<i>Asplenium flaccidum</i>	hanging spleenwort
<i>Asplenium oblongifolium</i>	huruhuruwhenua
<i>Asplenium polyodon</i>	sickle spleenwort
<i>Cranfillia fluviatilis</i>	kiwikiwi, kiwakiwa
<i>Dendroconche scandens</i>	mokimoki
<i>Dicksonia squarrosa</i>	wheki
<i>Histiopteris incisa</i>	mātātā
<i>Hymenophyllum demissum</i>	piripiri

<i>Icarus filiformis</i>	climbing hard fern
<i>Lomaria discolor</i>	petipeti, piupiu
<i>Paesia scaberula</i>	lace fern
<i>Pakau pennigera</i>	piupiu
<i>Parablechnum novae-zelandiae</i>	kiokio, horokio
<i>Pyrrosia eleagnifolia</i>	ota
<i>Sphaeropteris medullaris</i>	mamaku
<i>Zealandia pustulata</i> ssp. <i>pustulata</i>	kōwaowao, pāraharaha
VINES	
<i>Freycinetia banksii</i>	kiekie
<i>Metrosideros diffusa</i>	white rātā
<i>Metrosideros fulgens</i>	climbing rātā
<i>Metrosideros perforata</i>	akatea
<i>Ripogonum scandens</i>	kareao, pirita
SEDGES	
<i>Carex forsteri</i>	Forster's sedge
<i>Carex uncinata</i>	amu, matau-a-maui
HERBS	
<i>Astelia solandri</i>	kōwharawhara

NORTHERN GULLY NATIVE

MONOCOT TREES

<i>Rhopalostylis sapida</i>	nikau
TREES	
<i>Aristotelia serrata</i>	makomako
<i>Beilschmiedia tawa</i>	tawa
<i>Brachyglottis repanda</i>	rangiora
<i>Coprosma autumnalis</i>	kanono
<i>Elaeocarpus dentatus</i> var. <i>dentatus</i>	hinau
<i>Fuchsia excorticata</i>	kōtukutuku
<i>Geniostoma ligustrifolium</i> var. <i>ligustrifolium</i>	hangehange
<i>Knightia excelsa</i>	rewarewa
<i>Laurelia novae-zelandiae</i>	pukatea
<i>Lophomyrtus bullata</i> (no Myrtle rust noted)	ramarama
<i>Melicytus ramiflorus</i> ssp. <i>ramiflorus</i>	māhoe
<i>Olearia rani</i> var. <i>colorata</i>	heketara
<i>Piper excelsum</i> ssp. <i>excelsum</i>	kawakawa
<i>Pseudopanax arboreus</i>	whauwhaupaku
<i>Pterophylla racemosa</i>	kāmahi
<i>Schefflera digitata</i>	patē

FERNS & ALLIES

<i>Alsophila dealbata</i>	ponga
<i>Asplenium gracillimum</i>	hen & chicken fern
<i>Austroblechnum lanceolatum</i>	nini, rereti
<i>Cranfillia fluviatilis</i>	kiwikiwi, kiwakiwa
<i>Dendroconche scandens</i>	mokimoki

<i>Dicksonia squarrosa</i>	wheki
<i>Lomaria discolor</i>	petipeti, piupiu
<i>Loxogramme dictyopteris</i>	lancefern
<i>Pakau pennigera</i>	piupiu
<i>Sphaeropteris medullaris</i>	mamaku
<i>Zealandia pustulata</i> ssp. <i>pustulata</i>	kōwaowao, pāraharaha
VINES	
<i>Freycinetia banksii</i>	kiekie
<i>Ripogonum scandens</i>	kareao, pirita
SEDGES	
<i>Carex virgata</i>	pukio, toito

EXOTICS

TREES

<i>Buddleja davidii</i>	buddleia
<i>Cytisus scoparius</i>	wild broom
<i>Ulex europaeus</i>	gorse

HERBS

<i>Bidens frondosa</i>	beggar's ticks
<i>Persicaria</i> sp.	willow weed
<i>Ranunculus repens</i>	buttercup
<i>Solanum pseudocapsicum</i>	Jerusalem cherry

SOUTHERN GULLY

Likely more species to be recorded with an additional visits and time.

NATIVE

(p) = planted

MONOCOT TREES

<i>Cordyline australis</i> (p)	ti kouka
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TREES

<i>Alectryon excelsus</i> subsp. <i>excelsus</i>	tītoki
<i>Aristotelia serrata</i>	makomako
<i>Brachyglottis repanda</i>	rangiora
<i>Coprosma autumnalis</i>	kanono
<i>Coprosma rhamnoides</i>	
<i>Coprosma robusta</i>	karamū
<i>Geniostoma ligustrifolium</i> var. <i>ligustrifolium</i>	hangehange
<i>Hedycarya arborea</i>	porokaiwhiri
<i>Hoheria sextylosa</i> (p)	lacebark
<i>Knightia excelsa</i>	rewarewa
<i>Leptospermum scoparium</i> var. <i>scoparium</i> (p)	mānuka
<i>Melicytus ramiflorus</i> ssp. <i>ramiflorus</i>	māhoe
<i>Myrsine australis</i>	mapau
<i>Piper excelsum</i> ssp. <i>excelsum</i>	kawakawa
<i>Plagianthus regius</i> ssp. <i>regius</i> (p)	mānatu
<i>Pseudopanax arboreus</i>	whauwhaupaku
<i>Schefflera digitata</i>	patē

CLUBMOSES & QUILLWORTS

Diphasium scariosum

FERNS & ALLIES

Alsophila dealbata

Asplenium gracillimum

Asplenium oblongifolium

Austroblechnum lanceolatum

Cranfillia fluviatilis

Dicksonia squarrosa

Icarus filiformis

Lastreopsis velutina

Paesia scaberula

Parablechnum novae-zelandiae

Polystichum neozelandicum ssp. *zerophyllum*

Sphaeropteris medullaris

Zealandia pustulata ssp. *pustulata*

VINES

Muehlenbeckia australis

Ripogonum scandens

Rubus cissoides

GRASSES

Austroderia toetoe (p)

SEDGES

Carex geminata

Carex secta (p)

Carex uncinata

EXOTICS

TREES

Cytisus scoparius

Leycesteria formosa

Rubus fruticosus agg. (abundant in wetland)

Ulex europaeus

HERBS

Erythranthe guttata

creeping clubmoss

ponga

hen & chicken fern

huruhuruwhenua

nini, rereti

kiwikiwi, kiwakiwa

wheki

climbing hard fern

Velvet fern

lace fern

kiokio, horokio

shield fern

mamaku

kōwaowao, pāraharaha

pōhuehue

kareao, pirita

tātārāmoa

toetoe

rautahi

purei, pukio

amu, matau-a-maui

wild broom

Himalayan honeysuckle

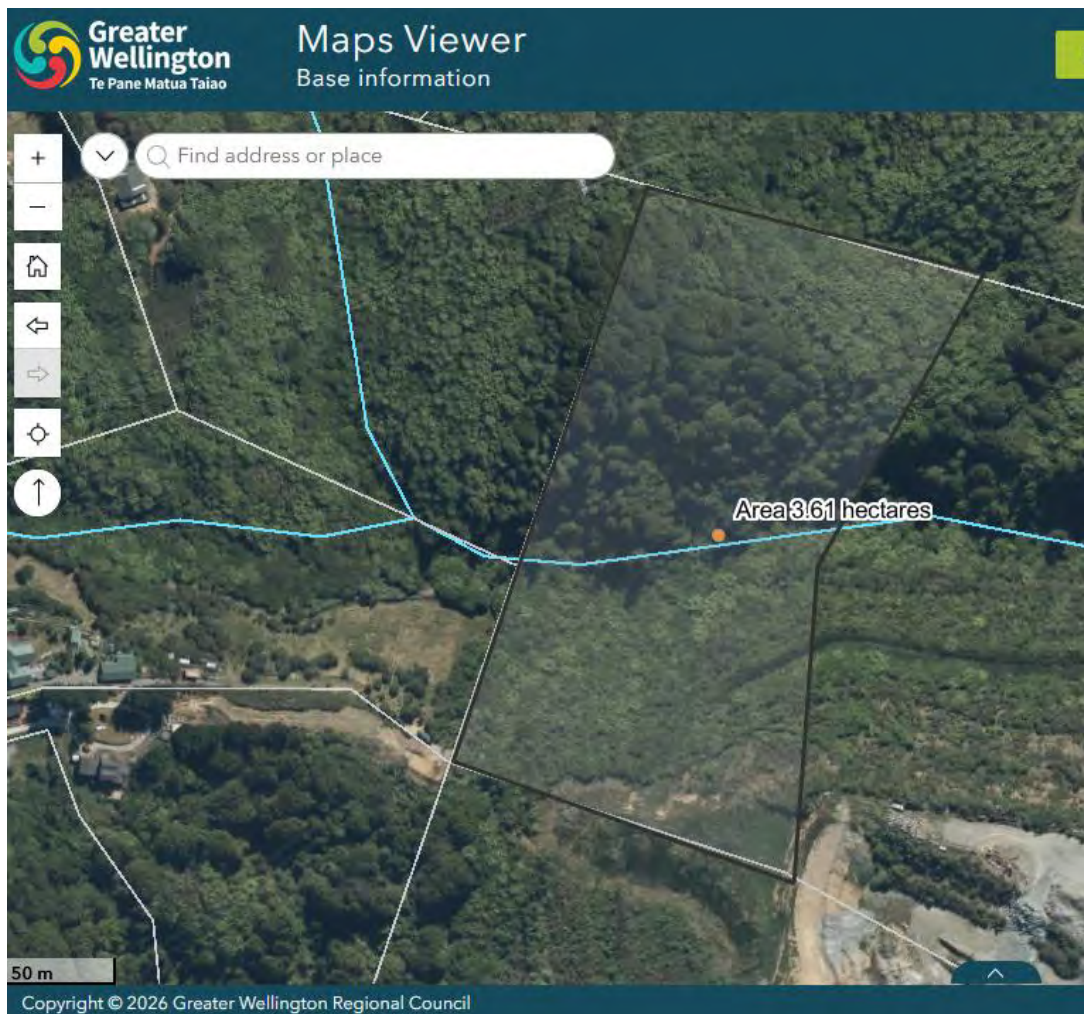
blackberry

gorse

monkey musk

Appendix 6. QEII Covenant measured accurately.

The QEII Covenant in the Northwest of the Northern Gully System was measured using the GWRC online measuring tool. Its area is 3.61ha.



Appendix 7. Guidelines used for assessing the area of DOC-Give & DOC- Get

Criterion	Definition	Key assessment principles	Assessment Attributes
Representativeness	The extent to which indigenous biodiversity is typical or characteristic of the natural diversity of the relevant Ecological District	- includes seral (regenerating) indigenous vegetation that is recovering following natural or induced disturbance, provided species composition is typical of that type of indigenous vegetation - Fauna habitat should be considered in terms of how well it supports the typical suite of indigenous animals that would occur in the present-day environment. Habitat of indigenous fauna may be indigenous or exotic - May include commonplace indigenous vegetation and the habitats of indigenous fauna, which is where most indigenous biodiversity is present. It may also include degraded indigenous vegetation, ecosystems and habitats that are typical of what remains in depleted ecological districts. It is not restricted to the best or most representative examples, and it is not a measure of how well that indigenous vegetation or habitat is protected elsewhere in the ecological district - When considering the typical character of an ecological district, any highly developed land or built-up areas should be excluded - Needs to consider indigenous vegetation and habitats that are representative of the full range and extent of ecological diversity across all environmental gradients in an ecological district, such as climate, altitude, landform, and soil sequences. The ecological character and pattern of the indigenous vegetation in the ecological district should be described by reference to the types of indigenous vegetation and the landforms on which it occurs	- The degree to which indigenous vegetation has ecological integrity that is typical of the character of the ecological district - The degree to which habitat that supports a typical suite of indigenous fauna is characteristic of the habitat type in the ecological district and the species expected for that habitat type in the ecological district

Diversity & Pattern	The extent to which the expected range of diversity and pattern of biological and physical components within the relevant ecological district is present	- Diversity of biological components is expressed in the variation of species, communities, and ecosystems. Biological diversity is associated with variation in physical components, such as geology, soils/substrate, aspect/exposure, altitude/depth, temperature, and salinity. - Pattern includes changes along environmental and landform gradients, such as ecotones and sequences. - Natural areas that have a wider range of species, habitats or communities or wider environmental variation due to ecotones, gradients, and sequences in the context of the ecological district, rate more highly under this criterion.	- The degree of diversity of indigenous species, vegetation, habitats of indigenous fauna or communities in the context of the ecological district - The quality of indigenous ecotones, complete or partial gradients or sequences.
Rarity & Distinctiveness	The presence of rare or distinctive indigenous taxa, habitats of indigenous fauna, indigenous vegetation or ecosystems	- Rarity is the scarcity (natural or induced) of indigenous elements: species, habitats, vegetation, or ecosystems. Rarity includes elements that are uncommon or threatened. - The list of Threatened and At Risk species is regularly updated by the Department of Conservation. Rarity at a regional or ecological district scale is defined by regional or district lists or determined by expert ecological advice. The significance of nationally listed Threatened and At Risk species should not be downgraded just because they are common within a region or ecological district. - Depletion of indigenous vegetation or ecosystems is assessed using ecological districts and land environments. - Distinctiveness includes distribution limits, type localities, local endemism, relict distributions, and special ecological or scientific features.	The degree to which: - an area provides for habitat of an indigenous species that is listed as Threatened or At Risk (declining) in the New Zealand Threat Classification System lists - an indigenous vegetation type or an indigenous species occurs that is uncommon within the region or ecological district - an indigenous species or plant

			community at or near its natural distributional limit occurs 4. indigenous vegetation is present that has been reduced to less than 20 per cent of its pre-human extent in the ecological district, region, or land environment 5. indigenous vegetation or habitat of indigenous fauna occurs in naturally uncommon ecosystems 6. the type locality of an indigenous species occurs 7. a distinctive assemblage or community of indigenous species occurs 8. a special ecological or scientific feature occurs
Ecological Context	The extent to which the size, shape, and configuration of an area within the wider surrounding	- Includes the characteristics that help maintain indigenous biodiversity (such as size, shape, and configuration) in the area - Includes the contribution the area makes to protecting indigenous biodiversity in the wider landscape (such as by linking, connecting to or	The degree to which an area: - has a robust size and a compact shape - is well-buffered - provides an important full

	landscape contributes to its ability to maintain indigenous biodiversity or affects the ability of the surrounding landscape to maintain its indigenous biodiversity	buffering other natural areas, providing 'stepping stones' of habitat or maintaining ecological integrity)	or partial buffer to, or link between, one or more important habitats of indigenous fauna or significant natural areas 4. is important for the natural functioning of an ecosystem relative to remaining habitats in the ecological district.
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Appendix 8. Examples of *Laurelia novaezeelandiae* – Pukatea specimens located within the OBDA.

Known locations of pukatea as recorded on InaturalistNZ, in similar locations to the swamp maire specimens in the OBDA as shown in figure 2, page 4.

(https://www.inaturalist.nz/observations?place_id=6803&taxon_id=186188)

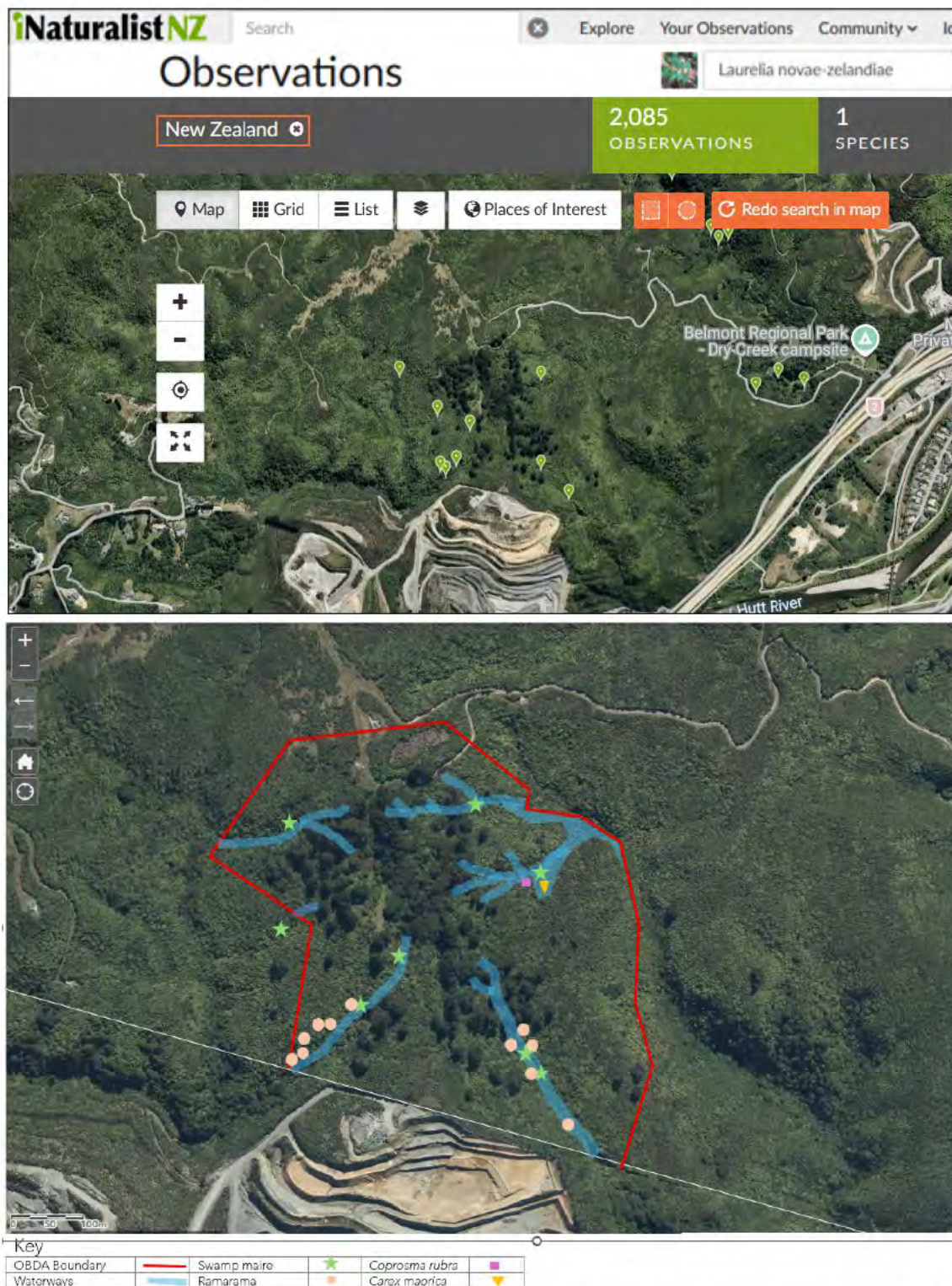


Figure 2. The OBDA present day, with the wet gully system, and Threatened Plants mapped as they were found during surveys in September 2025.

Package	Response from DOC (Botanical)
A • Southern Gully: 200 swamp maire to be planted in the southern gully • Dry Creek Approximately 7,000 plants, of which 500 ramarama within 0.8 ha area • Firth Block: 1000 kamahi and 1000 kanuka	These improvements are what has been suggested and used in earlier assessments with some modification of species used. The appropriate use of suitable species is an improvement to the package. This does not change the assessments made in the botanical technical report.
B differences from A • 200 swamp maire planting in the Belmont Regional Park, within the indicative area shown in Figure 1. • 200 ramarama planting in the Belmont Regional Park, within the indicative area shown in Figure 1 • 5 year weed management in Belmont Regional Park to assist with the establishment of 200 swamp maire and 200 ramarama • 10-year pest management in the Belmont Regional Park to assist with the establishment of 200 swamp maire and 200 ramarama	This package has no relevance to the land transfer as it is all on the BRP, outside of any area being discussed for land transfer. It does not affect any of the assessments made in the botanical technical report. From a botanical/restoration point of view, if this package was to be adopted the swamp maire and ramarama would need to be eco-sourced specimens from stock with the BRP. This is in line with GWRC policy, and particularly relevant to a taonga species such as swamp maire.

Organisation or person	Response from DOC
The fundamental disagreement between Dr Keesing's assessment and Mr Ward's is methodological: Mr Ward's assessment is primarily based on botany, focusing on species lists and the presence of swamp maire (<i>Syzygium maire</i>), whereas the BlueGreen assessment applies a broader ecological methodology, evaluating habitat maturity, structural complexity, and landscape function across all four EIANZ assessment criteria — representativeness, rarity and distinctiveness, diversity and pattern, and ecological context.	I used the same criteria as Mr Keesing. Clarifications in relation to the assessment of the OBDA have been added.
Considers that Mr Ward has materially overstated the conservation values of the DOC-Give area. Areas of disagreement include: • it is unusual for a relatively recent regenerated common broadleaf shrubland area to rank as moderate-high • ignored the greater part of the wider site (of the 24ha present 8ha is exotic weed fields (30%) and 9ha are young common native regenerating scrub 37%) • the scoring of the individual components of Mr Ward's assessment • the description of representativeness being modified is inconsistent with the ranking • diversity and pattern contains discussion about matters which are not related such as rarity. There is no WF8 kahikatea-forest in the DOC-Give • The ecological context assessment looks more like an assessment of rarity and discusses pest animal management. These factors do not make a moderate-high value for ecological context. Age, size, extent of buffering, functional	I have added clarifications to the OBDA assessment. The values assessed have not changed.

Organisation or person	Response from DOC
roles in species movement, seed sources and food resources should be the focus of the assessment of ecological context	
Considers that Mr Ward has under-valued the DOC-Get blocks. Matters of disagreement include: • not factoring in the larger cumulative area of the DOC-Get areas • the Firth Block and Northern Gully areas have more complex and aged and less disturbed communities than the DOC-Get area • the Firth Block and Northern Gully have the same younger seral communities as the DOC-Give, and there is a rare forest type (tawa-kāmahi forest type), and they support perennial waterways • Northern Gully and Firth Block should result logically in a higher than the DOC-Give result, because those areas are larger, older, more mature, of greater integrity, are mosaics of greater diversity and stature and have been less adversely impacted by past uses • Northern Gully is high value due to the absence of understory mammal disturbance is important but so is the value related to the rare forest type (Tawa-Kamahi MF7- endangered) and the Pukatea- Kahikatea (WF8 – critically endangered) type • The Firth Block has this range of mature forest in basins through to complex steep shrublands and in all measures other than rarity, the Firth Block should be greater than the DOC-Give because of its age, less modification and complexity • The value of the Southern Gully exchange wetland area which Mr Ward ranks as moderate. The areas of difference are rarity and ecological context. • The value of Southern Gully is heightened by the potential for greater restoration through the proposed weed management and importance of the area in being able to establish a sizable swamp maire forest area • The small area of QEII covenanted area in Northern Gully to score higher and differently than the wider area	Most of these suggested matters are relative to interpretation. Much of the areas suggested by Mr Keesing as early seral vegetation particularly in the Northern Gully area apart from the QEII covenant are planted areas over top of reshaped and reconstituted landforms which are of low value.
Disagrees with the 200:1 offset for the planting of swamp maire, and considers that 200 is a more fair and proportionate level than 1800. If the Panel found more was required, the Southern Gully could support up to 600.	I have reassessed this statement and amended it in the technical report as Mr Ussher made a good case for the NZTA decision being a resource consent condition not what is being discussed in as far as potential land transfer.
Mr Ward's analysis does not conform to the EIANZ (2018) values assessment protocol in its use of intermediate value rankings	I do not agree with this statement. This is the guidelines I was given to use. I understand all technical

Organisation or person	Response from DOC
(moderate-high, low-moderate). Such intermediate values are not recognised by EIANZ	reports used the same potential values.
Considers that a low-moderate rating for the Southern Gully does not appropriately reflect such a sizable wetland. It must be considered as high or even very high following weed and pest and swamp maire planting.	I do not agree with this statement. I do not consider the wetland to be of high value due to the state of infestation by non-native floral species.
Edge effects and their management are usually considered as a vegetation clearance effect through consent applications	Not applicable to the context I discussed.
Remain of the view that, taking into account the proposed improvements, principal of which is the addition of a large number of swamp maire and Ramarama, the land exchange proposal will achieve a net conservation benefit for ecological values.	The addition of two species of plant does not increase the ecological values of an area it merely slightly increases the diversity.
How values were derived at are not clear	Clarifications have been made in the technical report.
Weed and pest management will raise the Cottle Block to meet the better northern elements, but does not raise the average over all value to a different rank. In the Firth Block the western edge buffer planting and the weed and pest control similarly protects the existing values and allows progression of the vegetation but the deficit in this area in terms of values is the absence of rarity and the weed and pest management does not cause rarity to change. The moderate ranking will persist. The Dry Creek area, however, will greatly benefit from the weed and pest management and supplementary planting and bring it up to a moderate value.	The Northern Gully area apart from the QEII covenant are planted areas over top of reshaped and reconstituted landforms which are of low value, some weed care will not improve the ecological value greatly in my opinion. The Dry Creek area, is however in such a poor state that the considerable amount of effort required to remove the high percentage of weedy species, followed up by the vast number of plantings, would likely slightly improve the area.
The flora assessment is flawed in the DOC summary report because the method for assessing composite value has been applied inconsistently, and omits consideration of parcel size	Parcel size is not a botanical consideration.
Winstone are proposing to plant 200 swamp Maire and 200 Ramarama along with pest control to support the planting in this area as part of Package B, This would add significantly to the values of those wetland areas and spread the location of populations of swamp maire	It would add some value, not significant, plantings are not as valuable as natural.
Taking into account the proposed improvements, principal of which is the addition of a large number of swamp maire and Ramarama, the land exchange proposal will achieve a net conservation benefit for ecological values. Conservation values are further enhanced and provide even more benefit to the Crown if an additional 200 swamp maire and Ramarama in the Regional Park area proposed in Package B is provided.	The addition of two species of plant does not increase the ecological values of an area it merely slightly increases the diversity.

Fast-Track Panel

Under: Fast-Track Approvals Act 2024

In the matter of: FTAA-2603-L003 – Belmont Quarry Development – Land Exchange

Statement of advice: Rhys Burns

Terrestrial Fauna

Senior Technical Advisor, Department of Conservation

28 May 2026

Introduction

1. My full name is Rhys James Burns.

Instruction

2. I have been requested to provide expert advice regarding terrestrial fauna values to the Department of Conservation (DOC) on the Belmont Quarry Development Project Fast-track land exchange application.

Qualification and Experience

3. I am a Senior Technical Advisor (Fauna) for the Department of Conservation (DOC) based in the Rotorua Office. I have a BSc(Hons) (1993) and a PhD (1997) in Biochemistry from the University of Otago. I have been employed by DOC for 26 years – 5 years as a Biodiversity Ranger and the other 21 years as a Technical Advisor for terrestrial biodiversity. In this role I have performed a wide variety of roles such as providing advice to staff regarding terrestrial conservation matters, advising on prioritising national aerial 1080, assessing and advising on Wildlife Act authorities including lizard salvage applications, wildlife translocations. I am the leader of the Weka Recovery Group and the Kōkako Recovery Group, and am a member of the Frog Recovery Group. I have been an expert witness for DOC on terrestrial fauna matters in several RMA cases including Mt Messenger Road Bypass, Kaiwaikawe Windfarm, and Auckland Regional Landfill (Dome Valley). I am also a member of the Mt Messenger Ecological Review Panel, that advises New Zealand Transport Authority (NZTA) on ecological and pest control matters as they arise during the construction of this road bypass. I currently also have a central role co-ordinating DOC's terrestrial responses to listed and referred projects under the Fast-Track Approvals Act (2024) and Fast-Track Amendment Act (2025). Other Fast-Track projects I have provided expert terrestrial fauna advice to include Waihi North, Southland Windfarm (also under the Covid Fast-Track (2021)

legislation), Takitimu North Link Stage 2, and Huriwaka Windfarm. My role in this project to date has included review of land exchange application documents concerning ecological values of the sites, and attendance at a site visit on 17 October 2025.

Code of conduct

4. Whilst it is acknowledged this is not an Environment Court Proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this advice is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of advice and expert opinion

5. My expert advice relates to the following:
 - i. Adequacy of the Applicant's assessment of terrestrial fauna values, including identification of any values that have not been assessed or have been insufficiently characterised.

Material Considered

6. In preparing this advice I have reviewed the following documents as part of the land exchange application:

- i. BlueGreen (2026). Belmont Quarry Land Exchange: Overview of Ecological Values. Report prepared by BlueGreen Ecology Ltd for Winstone Aggregate Ltd.¹
- ii. Blueprint Ecology (2025). Lizards Memo, Appendix B2.
- iii. Boffa Miskell Ltd (2025) – Bat Assessment, Appendix B3.
- iv. Climate Change and natural hazards (appendix B14).
- v. Ecology Addendum – BlueGreen Ecology Ltd. (Dated: 5 March 2026).
- vi. Lizard Ecology Addendum – BluePrint Ecology. (Dated: 3 March 2026).
- vii. Waikaira Consulting (2025). Land Exchange report. An application by Winstone Aggregates for the Belmont Quarry Development.

Summary

- 8. Each block at Belmont Quarry proposed for land exchange was considered for fauna values, following the DOC guideline for land exchange assessments under the Fast-Track Approvals Act (2024)².
- 9. The values for birds, lizards and bats were considered at all sites as these were the main focus of the applicants' reports. No invertebrate surveys were undertaken, but some consideration was given to the possible presence of a threatened moth that is host dependent on the critically threatened swamp maire. Due to most sites being adjacent or relatively close to each other, mobile species such as birds and bats (if present) would be expected to generally use all sites similarly, but influenced by habitat type and quality. Animal pest control measures would be expected to increase breeding success. The presence and density of less mobile lizard species are expected to mainly be influenced by habitat quality, and animal pest management may increase their survival and breeding success.

¹ Any references to Sections, Figures or Tables in my Statement of Advice relate to this document, unless otherwise stated. Figures, tables and appendices within my Statement of Advice are referred to in **bold** text.

² DOC (2025). DRAFT internal guidance for conservation values assessments for land exchanges under the fast-track Approvals Act.

10. All sites have been disturbed by humans in the past, but due to containing areas of greater maturity and complexity (related to time and extent of previous disturbances) and greater area of extent, I consider the proposed total DOC acquisition sites ('DOC-Get') to be of slightly higher value to terrestrial fauna than the current PCL site (also called OBDA or 'DOC-Give') – see **Appendix 1**. However, if QEII sites in the Northern Gully and Firth block are unable to be considered, in my opinion the 'DOC-Get' and 'DOC-Give' sites have comparable fauna values.
11. An assessment of each land block for terrestrial fauna values is given in **Appendix 1**, and a table of how this was determined is shown in **Appendix 2**. Assessments were also made for the value of the terrestrial fauna found in blocks both with and without the QEII sites.

Terrestrial Fauna Values

Lizard values

12. Lizards have been surveyed at the DOC Public Conservation Land (PCL) site in the proposed OBDA by the applicant, using 75 triple-stacked onduline Artificial Cover Object's (ACO's), 105 pitfall traps, 3 nights of spotlighting and hand searching of habitat.
13. Within the OBDA, these surveys found four grass skinks (*Oligosoma polychroma*; At Risk - Declining) after surveying for 3 days, giving a low Capture Per Unit Effort (CPUE) of 3%. Spotlighting also occurred for 15.5 person-hours in the OBDA and three ngahere geckos (*Mokopirirakau* "Southern North Island"; At Risk – Declining) were found.
14. No lizard surveys were undertaken in any of the proposed land to be acquired by DOC, due to the feasibility and risk of undertaking the activity (very steep terrain, complex tall vegetation or dense, scrubby vegetation). It was also considered by the applicant's herpetologist that even if lizards were present and surveys occurred, there would be a relatively low chance of detecting lizards due to the complexity of the habitat (such as height of the canopy when undertaking spot-lighting), reflecting that most lizard survey methods often have poor detection rates.

15. However, previous surveys³ conducted in 2013-2017 did conduct surveys in the Firth Block, showing this is possible (**Fig 1**).



Fig. 1. Surveys undertaken in 2013 for lizards. The turquoise-coloured area on the left has now been largely quarried. From Bell et al (2013), Appendix, Fig. 2.

16. The 2012-13 survey recorded a well established population of ngahere gecko on a ridge that has now been quarried (**Fig. 1**). Other ngahere gecko were found in the current Firth Block QEII site. My understanding is that 49 of 51 ngahere gecko found following initial surveys were translocated to the Mana Island in 2015⁴ and 2017⁵ (with 2 having died in captivity).
17. A comparison with previous lizard assessments in the area is provided in Table **WW**. This shows considerably higher survey effort than was undertaken for this assessment including in parts of the Firth Block which are currently declared to

³ Bell T, Herbert S and Melzer S (2013). An assessment of the lizard fauna – Belmont Quarry Extension. Report prepared for Winstone Aggregates. Eco Gecko Consultants Ltd. DOC DM-1550867.

⁴ [Ngahere gecko transferred from Belmont Quarry to Mana Island | https://www.scoop.co.nz/stories/SC1507/S00020/ngahere-gecko-transferred-from-belmont-quarry-to-mana-island.htm](https://www.scoop.co.nz/stories/SC1507/S00020/ngahere-gecko-transferred-from-belmont-quarry-to-mana-island.htm)coop News

⁵ <https://www.scoop.co.nz/stories/AK1703/S00827/native-geckos-rehomed-on-pest-free-island.htm>

be unworkable due to very steep terrain and dense vegetation. For example, the survey effort in March-May 2013 consisted of placing 270 sets of ACO's, pitfall traps, and closed-cell foam covers on a 10 x 10m grid. All 270 ACO's and closed-cell covers were checked 7 times each and pitfall traps checked 5 times each, resulting in the capture of 13 ngahere geckos. This level of monitoring was required as destruction of their habitat by quarrying was imminent, but it demonstrates the level of effort that is required to find lizards in this habitat. Despite this level of effort, no other lizard species were found, indicating a low density or possible absence of these species at this site (although barking gecko are difficult to find due to often being in the canopy of trees).

18. The details of all lizard removal efforts could not be located, but in total these removal efforts performed 16,000 checks of closed-cell foam covers and removed 51 ngahere geckos⁶. An indication of the initial survey effort undertaken in 2012 and 2013 is provided in **Table 1**.

Date	Land Block	Survey methods and effort						Total Lizards Caught
		Minnow traps	Pitfall traps	Hand searching (daytime)	Closed-cell covers	Onduline ACO's	Night Spot-lighting	
21-23 May 2012 ⁷	Firth Block	46 trap days	50 trap days	15.4 person-hours over 11,600m ² [1 skink caught]	-	-	-	1 northern grass skink
March-May 2013 ⁸	Firth Block	-	270; 5 checks (1350 trap days) [0 lizards caught]	-	270; 7 checks (1890 catch-days) [12 geckos caught]	270; 7 checks (1890 catch-days) [0 lizards caught]	20 hours over 3.0ha [1 gecko caught]	13 ngahere gecko
	Belmont Regional Park	-	-	-	-	30; 3 checks (90 catch-days) (0 lizards caught)	-	0 lizards

Table 1. Previous survey effort for lizards at Belmont Quarry in 2012-13.

19. These surveys strongly indicated that closed-cell foam was the most effective method to detect ngahere gecko, after being left in place for several months to

⁶ Beca Limited (2023). Lizard management Plan – Belmont Quarry. DOC-7499493.

⁷ Bell T, Herbert S and Melzer S (2013). An assessment of the lizard fauna – Belmont Quarry Extension. Report prepared for Winstone Aggregates. Eco Gecko Consultants Ltd. DOCDM-1550867.

⁸ Ibid.

‘bed-in’ and attract geckos. Despite this finding, the current assessment did not use this method, and only 2 ngahere geckos were found (both by spotlighting).

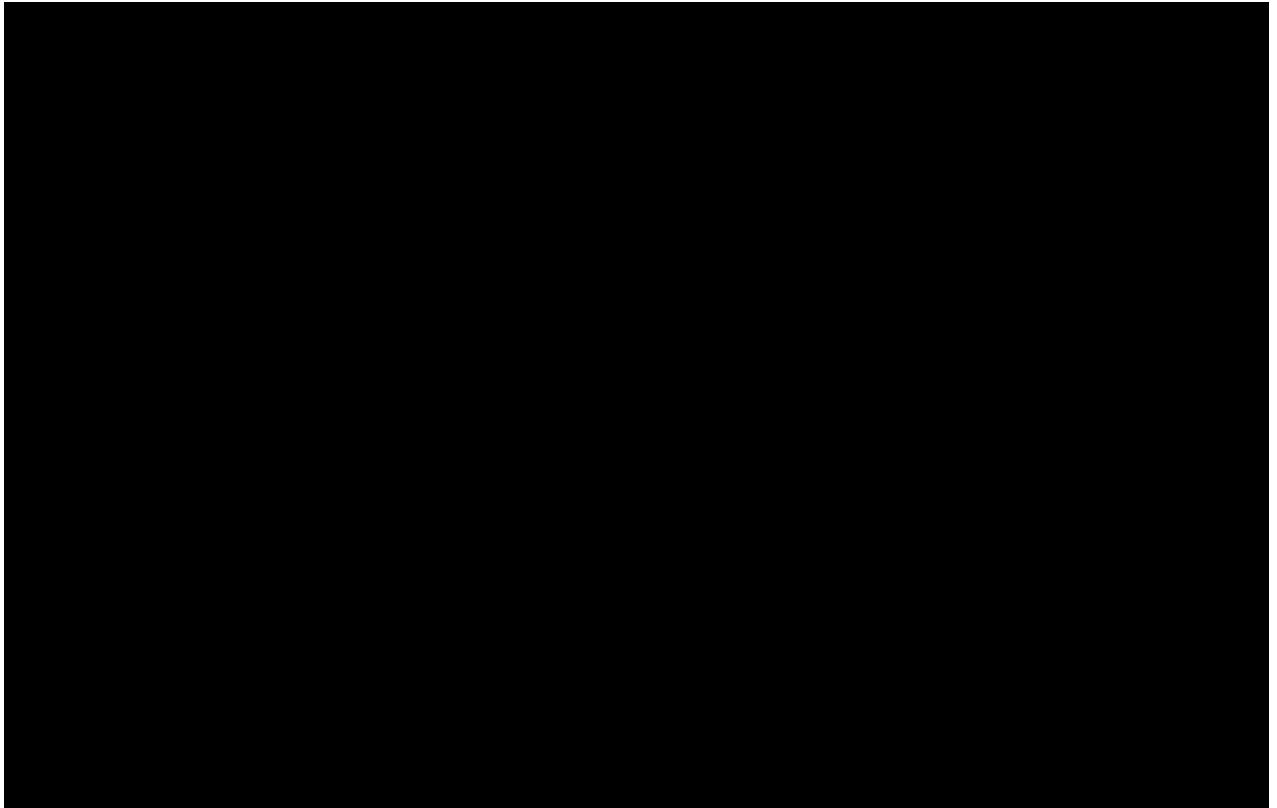


Fig 2. Lizard records on DOC's herpetofauna database. Red dot = ngahere gecko; Green dot = northern grass skink. Black lines indicate property boundaries (the proposed OBDA is not specifically outlined).

20. This makes it difficult to directly compare the OBDA with the other four sites proposed to be exchanged. However, the applicant has assessed that lizard diversity and abundance can generally be positively correlated with vegetation maturity and complexity over small adjacent areas, so each land parcel can be roughly assessed for lizard value based on vegetation type.
21. I generally agree with this assumption at this site. This assumption is due to more ecological niches and a greater quantity of three-dimensional habitat being available to lizards in a given area, as well as time since disturbance, allowing lizards time to maintain or even build a population for longer. More complex habitat may also provide more refugia sites for lizards from introduced pest animals (such as rats, mice and stoats) allowing lizard populations to persist for longer (i.e. decline at slower rates) than in structurally simpler habitat where they may be more easily preyed upon. The land parcels (except Dry Creek) are also adjacent to each other, making it less likely any high value ‘hotspot’ for lizards don’t also extent into similar, immediately adjacent habitat.

22. A summary of the quality of lizard habitat is provided across all the considered land areas⁹, which based on my site visit and consulting aerial maps, I largely agree with. This shows that there is approximately 4.29 ha (over 2 separate sites¹⁰) of high quality lizard habitat in the PCL ('DOC-Give') area, and 7.75 ha (over 5 separate sites) total high quality in the proposed DOC acquisition ('DOC-Get') sites.
23. However, previous surveys revealed a relatively high density of ngahere geckos in habitat that has now been quarried. The vegetation at these sites was referred to as native scrub, with rocky habitat also being present. Of 13 ngahere geckos caught in 2013 surveys, 4 were found in 'Kanuka, manuka & gorse', 4 found in 'mixed secondary forest', 3 in 'secondary forest' and 2 others in mahoe forest (**Table 2**). None appeared to be in mature forest habitat, but this could reflect the difficulty of catching geckos in this habitat type.

Habitat Type	Ngahere geckos caught in 2013
Kanuka, manuka & gorse	4
Mixed secondary forest, incl. red mapou	4
Secondary forest, adjacent to tawa	3
Mahoe in broadleaf forest	1
Mahoe adjacent to tawa	1
Total	13

Table 2. Ngahere geckos caught in 2013 surveys by habitat type in area of Firth block that has now been quarried.

24. The use of animal pest control for maintaining lizard populations is important, but due to the very steep terrain and dense vegetation at much of the proposed exchange sites, the feasibility of undertaking effective ground-based pest control at the proposed DOC acquisition sites, and maintaining lizard populations in the

⁹ Table 3, Blueprint Ecology memo, 3 December 2025 (Document B2 Lizard Assessment)

¹⁰ Figure 5, Blueprint Ecology memo, 3 December 2025 (Document B2 Lizard Assessment)

long-term, is likely to be lower than on the more accessible and gentler topography of the PCL (OBDA) site.

25. The applicant is also offering to undertake rat control (Table 20), but the offer of developing a 'rat trap plan' indicates rat trapping only will occur. Rats are difficult to consistently control to the low levels required to achieve conservation gains, and several methods (e.g. toxins in bait stations) may need to be deployed simultaneously. In addition, lizards can also be badly affected by mice (which can also increase when rats alone are controlled), so any rodent control plan to benefit lizards will also need to consistently control mice to low levels. Rodent monitoring objectives should also be clearly stated (e.g. 5% tracking tunnel index), rather than the current suggested measure that rats are 'kept low' (Table 20).
26. The lizard species present potentially present at the site are listed in **Table 3**, alongside their regional and national threat status. The Wellington Region is considered for both mainland-only sites, and the whole region (including islands and pest-free areas) as lizards are vulnerable to introduced pests that can dramatically alter population abundance and trends.

Common Name	Scientific name	Wellington Mainland	Wellington Region	National
Pacific gecko	<i>Dactylocnemis pacificus</i>	Data deficient	Data deficient	Not Threatened
Barking gecko	<i>Naultinus punctatus</i>	Vulnerable	Vulnerable	Declining
Copper skink	<i>Oligosoma aeneum</i>	Vulnerable	Declining	Declining
Ornate skink	<i>Oligosoma ornatum</i>	Vulnerable	Declining	Declining
Glossy brown skink	<i>Oligosoma zelandicum</i>	Declining	Declining	Declining
Ngahere gecko	<i>Mokopirirakau</i> "southern North Island"	Declining	Declining	Declining

Minimac gecko	<i>Woodworthia</i> “Marlborough mini”	Declining	Declining	Declining
Northern grass skink	<i>Oligosoma polychroma</i>	Not Threatened	Not Threatened	Not Threatened
Raukawa gecko	<i>Woodworthia maculata</i>	Not Threatened	Not Threatened	Not Threatened

Table 3. Conservation status of lizards currently found on the mainland in the Wellington region.

Avifauna Values

27. Bird surveys with acoustic recorders were carried out at four sites – two within the PCL (OBDA), one on the boundary of the PCL (OBDA) and Firth Block, and one on the boundary of the Northern Gully and Belmont Regional Park (Fig. 11). These sites correspond with four different habitat types (Table 4) – Tawa (Northern Gully), Lake (Firth Block QEII), Kanuka and Exotic (both OBDA), although habitat immediately adjacent to AR1 (outside the PCL and proposed acquisition area), have not been described. Each site is also immediately adjacent, or close to, habitat types other than that described for the immediate site. This will influence the birds present and thus the recorded bird calls, as birds are mobile and their calls can be heard from distances greater than the size of the habitat areas. For clarity, I note that Table 10 calls the site of the AR4 recorder ‘Manuka’, whereas Fig. 44 & 45 refer to it as ‘Kanuka’.
28. The recordings of AR1, AR2 and AR3 were analysed by the applicant, but the ‘Manuka’ site (AR4) in the PCL area (described as Manuka Mixed Broadleaf Forest) in Fig. 11, was apparently not analysed for birds (Part 7.1, first paragraph). However, Table 10 does include species detected at the AR4 site. The AR4 site has more mature forest than the other PCL site (AR2) that was analysed, and I consider it will likely have a higher density of native birds than the AR2 site. The analysis in Table 10 showed little difference in species diversity (if North Island robin is excluded). I consider this recording data demonstrates that diversity is not especially meaningful when considering the value of each land parcel for birds, as they are small areas close to each other, and most birds can readily fly between the different land parcels. It also doesn’t

account for how much time birds of each species spends in each land parcel, to gauge its relative importance.

29. There are several drawbacks to understanding the avian value of a site by relying on sound recordings alone. Some species that could be present rarely verbalise, particularly outside of the breeding season or away from nests (e.g. shags), so will not be recorded by this method. The sites also had recordings made at the coldest time of the year (July and August) which in my opinion is a poor time of year to rely on an assessment of bird value at each site. Some birds (e.g. kingfisher) can move to lower and warmer altitudes over winter months, other birds have different call rates at different times of the year, while other birds (e.g. long-tailed cuckoo and shining cuckoo) migrate overseas during winter. Undertaking bird monitoring in each of the four seasons would be far better in order to gain a better understanding of how important these sites are for birds throughout all times of the year.
30. Nevertheless, I consider the areas of tawa-kamahi forest, hinau-kamahi forest, pukatea-rewarewa forest and pukatea-tawa forest in the Northern Gully (Fig. 15) and the small area of tawa-kamahi forest in the Firth Block QEII area (Fig. 36) should offer better quality native forest bird habitat than most areas present in the PCL (OBDA). However, I consider the other forest types in these two blocks will offer relatively low quality habitat for native forest birds.
31. Likewise, the other sites proposed for DOC to acquire – the Southern Gully (Fig. 23) and Dry Creek (Fig. 28) – the forest is in a state of early succession or dominated by exotic vegetation and weeds, so I consider these areas to be of low quality for native forest birds.
32. The applicant has stated they cannot determine an abundance estimate of birds for the sites using the acoustic recorders. I agree with this to some extent, as acoustic recorders have most accuracy when only used to confirm which bird species are present through their calls. However, I also consider this approach is limiting the full usefulness of these recorders, particularly when there is a requirement during the land exchange process to make a direct comparison between sites, including estimates of density of fauna species.
33. Acoustic recorders can also be used to determine a call activity rate for each species (such as the number of calls per 5 minutes, or calls per hour). When

used to compare different sites with similar habitats, these call rates can be used as an approximation of the relative abundance of each bird species¹¹.

34. Another way to estimate bird species' abundance can be to use five-minute bird counts (5MBC's)¹². This would mean having a grid (e.g. spaced 100 x 100m apart) over the entire area, and counting all individual birds that are seen and heard within a set distance (usually 200m but this can be modified to a smaller distance to accommodate smaller, fragmented forest blocks) for 5 minutes at each grid point, with the location and species of each bird recorded. In this way, the number of individual birds of each species can be estimated at each grid point. As more counts are undertaken (including repeated counts at the same site) an increasingly robust estimate of the density for each species can be calculated for a given site. A combination of both acoustic recorders and 5MBC's have also been used for New Zealand forest birds¹³.
35. Yet another method that could be undertaken is 'distance sampling', where the distance and direction of each bird from each grid point or transect line is determined, and then a computer program is used to estimate the density of each bird species across a forest block. This has also been undertaken successfully in New Zealand forests¹⁴.
36. The density and diversity of forest birds is also likely to be related to the current management of the site. There is currently animal pest control undertaken at the Belmont Regional Park, including in the proposed OBDA (**Fig. 1** at [20] below), and very little (with no bait stations) in the current private land being considered for exchange. Since it was implemented, this pest control should have resulted in birds within the pest control area having a higher proportion of successful nests and increased food resources, enabling them to both increase in density and disperse into neighbouring areas, including the adjacent private land being considered for exchange.

¹¹ Mortimer, JAJ; Greene, TC; van Dam-Bates, P; Westbrooke, IM (2019). Effectiveness and efficiency of avian species detection: a comparison between field observers and automatic recording devices. *Notornis*, 66: 109-128.

¹² Dawson, DG and Bull, PC (1975). Counting Birds in New Zealand Forests. *Notornis*, 22: 101-109.

¹³ Bombaci, SP and Pejchar, L (2019). Using paired acoustic sampling to enhance population monitoring of New Zealand's forest birds. *NZ Journal of Ecology*, 43: 3356.

¹⁴ Drummond, FM and Armstrong, DP (2019). Use of distance sampling to measure long-term changes in bird densities in a fenced wildlife sanctuary. *NZ Journal of Ecology*, 43: 3371.

37. The other habitat type present – a freshwater pond – contained several species of birds that would otherwise not be usually found in forested habitat. These include Caspian tern, pied shag and little shag. However, due to the location of the pond on the boundary between the PCL and Firth Block, these species are found on both parcels of the proposed land swap, so it is effectively a neutral value when considering any loss or gain that would result for the DOC conservation estate if the proposed land swap were to occur.
38. There are 8 bird species present that are regarded as nationally threatened, two of which are assessed as being Regionally Critically Threatened, and a further two Regionally Critically Threatened on Mainland sites only (**Table 4**).

Species	Regional Threat Status ¹⁵		National Threat Status ¹⁶
	Mainland sites only	Region-wide (including islands and pest-free areas)	
Caspian tern	Critical	Critical	Vulnerable
Bush Falcon	Critical	Critical	Increasing
NI robin*	Critical	Vulnerable	Declining
Red-crowned parakeet	Critical	Vulnerable	Relict
Little shag	Endangered	Endangered	Relict
Long-tailed cuckoo	Endangered	Endangered	Vulnerable
Little black shag	Endangered	Endangered	Uncommon
Pied shag	Vulnerable	Vulnerable	Recovering

Table 2. Threatened avifauna species detected

* In my opinion, unlikely to be present

¹⁵ Crisp P, Robertson H, McArthur N and Cotter S (2020). Conservation status of birds in the Wellington Region. Greater Wellington Regional Council, Publication No. GW/KI-G-23/21, Wellington.

¹⁶ Robertson HA et al. (2021). Conservation status of birds in Aotearoa New Zealand, 2021. *New Zealand Threat Classification Series 36*, Department of Conservation, 43p.

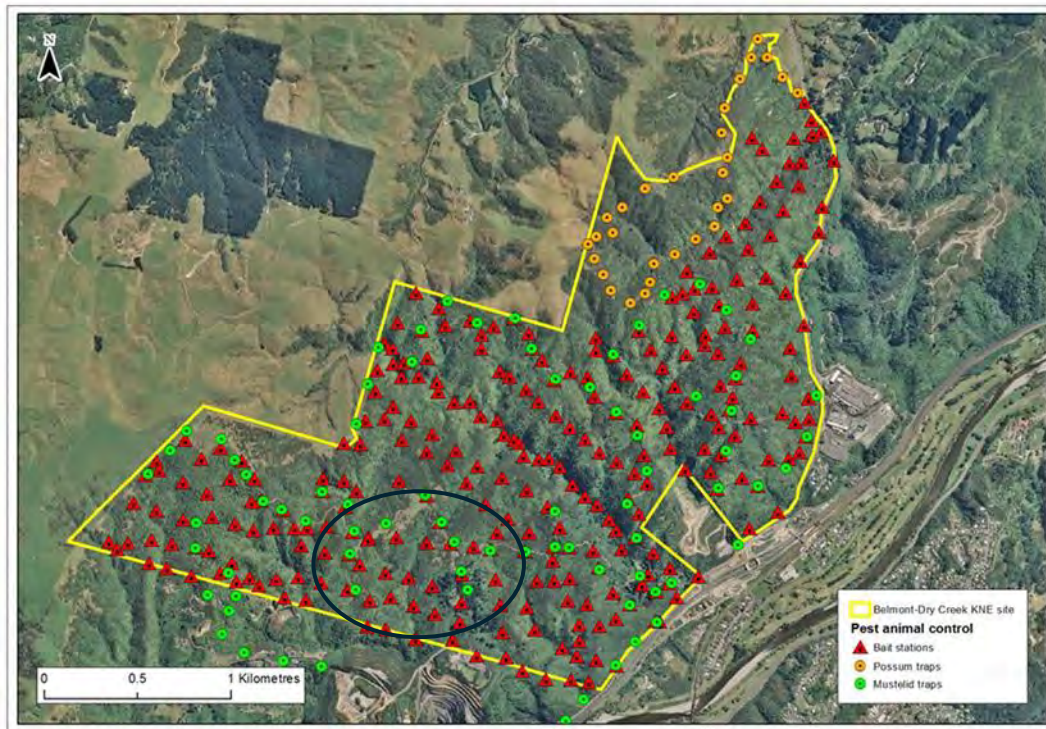


Fig. 3. Animal pest control in the Belmont-Dry Creek KNE site¹⁷. Black oval is approximate OBDA site

39. The comparative assessment (Table 19) shows the most threatened fauna species known at the site. I agree with the assessment that the forest bird species are mobile and if present in one area, are likely to also be present in the other forested areas nearby. However, I consider forest birds are unlikely to consistently use the early seral vegetated areas, but should increasingly do so as the vegetation slowly matures into full canopy and more complex and varied habitat.
40. I am somewhat sceptical that North Island robins are present at any of the sites as they are regarded as Regionally Critical (less than 250 individuals) on the mainland of the Wellington region and, outside pest-free areas (e.g. Zealandia), only seem to be found in small areas of the Tararua ranges. However, if they are present, they are apparently present in both the PCL and proposed DOC acquisition areas. Similarly, shining cuckoo were regarded as being detected by the bird recorders during the July recording period. I also regard this as dubious, as shining cuckoo migrate overseas during winter and very few are thought to

¹⁷ GWRC (2023). Key Native Ecosystem Operational Plan for Belmont-Dry Creek 2023-2028. Appendix 1: Map 6.

remain in New Zealand during winter. Despite their song being very distinctive, eBird records only one shining cuckoo record in the Wellington region ever during June-July (in 2021), and only 13 records over all of New Zealand during June-July¹⁸. These two examples of unlikely (but still ecologically possible) species being identified makes me hesitant in relying on the accuracy of bird species identified using the avian bird recorders at this site. I consider species identified in site visits (Table 10) are likely to be more reliable, as these species can often be seen as well as heard.

41. For threatened birds found at the pond (Caspian tern, pied shag and little shag), I consider that as the pond is found adjoining both the Firth Block and PCL (OBDA) areas, then both areas should have the presence of these species attributed to them when ecologically evaluating all the sites. This has not occurred in Table 10, where only the Firth Block is attributed as having these species present.
42. The use of bird recordings alone does not present the best opportunity to detect whether spotless crane or marsh cranes are using the site. A better option is for an observer to broadcast their recorded calls in spring to try to illicit a response from any resident birds. This method does not seem to have been employed here.
43. For wide-ranging birds such as bush falcon, all sites are likely to be used for hunting, resting or roosting. Emergent trees can be valuable perching and observation sites for falcon, and somewhat ironically, the exotic pine trees in the PCL (OBDA) may best serve this function across all the proposed land exchange areas. I consider it unlikely bush falcon use any of the land exchange sites for nesting, based on the relatively small area these sites would contribute to a typical falcon territory. Falcon may return to a similar area to nest most years (usually in areas clear of vegetation or rocky ledges), but I am not aware of where any nesting sites are for falcon in this territory. If falcon were confirmed to be consistently nesting in one of the land exchange areas, that would make the site locally important for falcon. In the absence of this

¹⁸[Shining Cuckoo - Species](#)

<https://ebird.org/map/shbcuc1?neg=true&env.minX=175.08235168457034&env.minY=-41.025118295975886&env.maxX=175.77998352050784&env.maxY=-40.803552231219506&zh=true&gp=false&ev=Z&excludeExX=false&excludeExAll=false&mr=6-7&bmo=6&emo=7&yr=all&byr=1900&eyr=2026> Map - eBird ; Accessed 27th April 2026

evidence, however, I consider all sites with a closed canopy to be rated the same value for bush falcon.

44. The comparison of the values for land exchange requires each site is considered. In my opinion, a more robust approach would have been to undertake bird monitoring using a variety of methods – avian recorders, 5MBC's and distance sampling, and undertaken each season e.g. February, May, August and November. At least one avian recorder should have been placed in each block proposed for land exchange, with one near the centre of the block and others near the centre of different habitat types if present so all main habitat types e.g. tall mature forest, seral forest, exotic dominant grassland, wetland, are captured. Analysis of 5MBC and distance sampling could also stratify results into these main habitat types. Ideally, this monitoring would also have occurred over several years to understand the extent to which there is any annual variation in the use of each site by native birds.

Bat Values

45. Bat monitoring was undertaken for 21 nights between 24 October and 14 November 2025 at 23 (Fig. 13) sites in both proposed OBDA and DOC acquisition area, using suitable bat detectors.
46. While the number and layout of detectors is adequate, there was no analysis provided of which of these nights were suitable for the emergence of bats (i.e. low wind speeds and warm conditions (>10 deg C for the first 2 hours of darkness)).
47. Therefore, despite the 3 weeks of survey, bat monitoring requires approximately 3 weeks (21 nights) of monitoring in environmental conditions in which bats are known to be active. As this information was not provided, and no analysis of environmental suitability was provided, it is somewhat uncertain if this monitoring regime could be fully relied upon to detect bats with high certainty if they are intermittently present at the site.
48. This is important, as if the land swap proceeds, the vegetation on the PCL will be felled. The DOC bat tree-felling protocol should be implemented if this occurs.

Invertebrate values

49. No invertebrate monitoring was undertaken by the applicant, and there are no known threatened invertebrate species present at the site. However, the presence of swamp maire means it is possible the brightly coloured endemic leaf miner moth *Macarostola miniella*¹⁹, which is regarded as being host-specific on swamp maire, may also be present. If so, then due to the low abundance of swamp maire in the Wellington region²⁰, this moth is likely to be rare in the Wellington region also.
50. Swamp maire has been assessed to have a national conservation threat classification of Threatened – Nationally Critical²¹ due to the recent arrival of myrtle rust in New Zealand, a fungus that causes high mortality of swamp maire. Despite this, *M. miniella* has recently been assessed as being At Risk – Declining on a national scale²². It should be noted, however, that this species has also been given the qualifiers of ‘Data Poor Size’ and ‘Data Poor Trend’, reflecting uncertainty in the current size and trend of its national population.
51. As swamp maire is only found in the current PCL (proposed OBDA), and not in any of the other proposed DOC acquisition areas, I consider the terrestrial invertebrate values in the PCL are likely to be higher than the other lands available for the proposed land exchange due to the potential presence of this moth. However, due to the paucity of invertebrate information, I have not considered invertebrates in the evaluation of terrestrial ecological value (**Appendix 1 & 2**).

Additional comments

52. Table 12 that is comparing the sites appears to have some errors. Several of the columns and rows don’t sum up to the totals stated in the Table, and some habitat appears to be assigned to the incorrect area of the proposed

¹⁹ https://en.wikipedia.org/wiki/Macarostola_miniellalla - Wikipedia, accessed 13 April 2026.

²⁰ Statement of evidence of Mr Ward (Vegetation) at [5], p.7

²¹ de Lange, PJ; Gosden, J; Courtney, SP; Fergus, AJ; Barkla, JW; Beadel, SM; Champion, PD; Hindmarsh-Walls, R; Makan, T and Michel, P. (2024). Conservation status of vascular plants in Aotearoa New Zealand, 2023. New Zealand Threat Classification Series 43. Department of Conservation, 105 p.

²² Hoare, RJB; Edwards, ED; Knox, C; Frost, WT and Michel, P. (2026). *Conservation status of Lepidoptera (moths and butterflies) in Aotearoa New Zealand, 2025*. NZ Threat Classification Series 51. Department of Conservation, 58 p.

land exchange ('DOC-Get' or 'DOC-Give'). For example, the 'Tawa-kāmahi forest' row shows 3.24 ha is present in the 'Northern tawa-kāmahi-Cottle' area, but the total for the 'DOC-Get' is 0.9ha; whereas the OBDA + setback is 0.9ha, yet the Total 'DOC-Give' area is left blank. The total of the OBDA + setback area states a total area of 24.00ha, but summing this column only shows 16.51ha. The last row in Table 12 also has no description attached so I am unsure of the habitat type this signifies. Unfortunately, I have had to conclude that this table, which would have been very helpful in understanding the extent of habitats that will support native terrestrial fauna in each individual block, cannot be relied upon.

53. Table 13 appears intended to have measurements taken directly from Table 12, but there again appear to be inconsistencies. For example, Table 12 shows the 'Total DOC-Get' area of 'Young gorse/pasture' to be 11.75ha, whereas Table 13 shows this habitat type to only be 0.29 ha, but 'Early seral broadleaf forest' to be 11.75ha, the exact same areas as 'Young gorse/pasture' in Table 12. This creates considerable uncertainty in knowing which measurements are the correct ones to be relied upon in any assessment where vegetation habitat influences fauna values. Comparing the habitat area in both tables with Fig. 54, I consider Table 13 is most likely to have the correct habitat areas recorded, so I have used those measures to support my assessment.
54. Table 16 and Table 17 both include a separate assessment of ecological function over 5 different sites that DOC may acquire in any successful land exchange process, whereas Table 12 only shows 4 sites. The additional area appears to be the 'Cottle Block' which for a reason that isn't explained is considered separately in this assessment. The Cottle block is also described separately as part of the Northern Gully in Part 6.1, but the accompanying map (Fig. 15) doesn't specify the boundaries of the Cottle block. I have assumed this block is located between the Northern Gully area (also called Northwestern tawa-kāmahi) and the Southern Gully area. The addition of the Cottle block is also inconsistent with other Tables and assessments throughout the document (e.g. Table 4), where only 4 potential DOC acquisition areas are considered for birds.
55. Animal pest control is currently undertaken in Belmont Regional Park by Greater Wellington Regional Council (GWRC), using bait stations and traps to target possums, rats and mustelids (**Fig. 3** above). Possum control has occurred since 2007 while mustelid and rat control commenced in 2018.

Overall assessment – current terrestrial fauna value of Sites

56. I consider the current overall ecological value of the sites proposed for land exchange (PCL and potential acquisition areas) for terrestrial fauna as:
- a. DOC PCL component of Belmont Regional Park – the proposed OBDA ['DOC-Give'] site: **Moderate.**
 - b. Proposed DOC acquisition sites ['DOC-Get site'] (composed of: Southern Gully, Northern Gully, Firth Block and Dry Creek): **Moderate-High.**
57. The assessment process I used to determine these values is shown in **Appendix 2**. In this process, I divided the 'Representative' value into four components and the 'Ecological Context' value into two components. I considered this was necessary in order to encompass the different aspects contained within these definitions when considering terrestrial fauna.

Overall assessment – future terrestrial fauna value of land parcels following improvements made by the Applicant

58. The applicant has offered several ecological management improvements to the proposed acquisition land parcels²³. I have considered any likely changes these proffered management actions may result in and outline them in **Appendix 1**.
59. The proffered management actions vary considerably across all the 'DOC-Get' blocks, but only a subset of actions will have benefit terrestrial fauna over the period the actions are offered over. The applicant offers weed, goat, possum and rodent control actions. All actions have a defined term that varies from 2-10 years, and all actions are offered by block, except for rats, where a rat trap plan is offered to be developed. As the timeframes for different actions are variable, there is uncertainty at which year to consider the result of the management actions for each land parcel. As 5 years is the most consistent time frame, I have decided to consider the terrestrial fauna of the land parcels after 5 years of the proffered management actions. It is assumed the current pest control at the OBDA ('DOC-Give') site would otherwise continue with seasonal control of rats, mustelids and possums. I have also considered the

²³ Waikaira Consulting (2025) at [10.7] – [10.14] and Section 13.

terrestrial fauna value of the OBDA in 5 years' time as a fair comparison with the proposed DOC acquisition sites.

Northern Gully

60. Goat and possum control occurs for 5 years in the QEII site and eastern pukatea forest, while possum and weed control is proposed for the Cottle portion of this block. The frequency of possum trap checking is not mentioned, but as there are two traps proposed per hectare, I have assumed there would be a slow reduction in the density of possums over a 2 year period to low levels, at which point a low density of possums would be achieved for the next 3 years. Due to the small site, I have assumed goats can be effectively eradicated from the site over the first year.
61. This should result in slightly better habitat for birds over the 5 years, allowing better food resources and better roosting and nesting sites. More native plant species dominance in the weed-controlled seral areas is assumed to have a marginal benefit for birds over 5 years. However, as rat, mustelid or cat control isn't proposed, there will only be limited benefit to nesting birds from possum control alone. Increased food resources may result in a higher density of birds at the site over 5 years as they spill over from possum, rat and mustelid control in areas adjacent to this land parcel. Lizard species are unlikely to benefit from this pest management regime as they are susceptible to rats, mustelids, cats and hedgehogs.

Firth Block

62. Rat control is offered over 10 years, but the area being offered for control seems contradictory. At [10.12], 'targeted rodent control around the farm pond' is offered, but the maps (at [10.7]) indicates the entire Firth Block will have rat control. For my assessment, I have assumed effective seasonal rat control to benefit nesting birds, from spring to late summer, each year for 5 years.
63. It is not known if wetland birds breed at the pond, so the benefits of this control for these species is uncertain. Nevertheless, I have assumed some wetland birds may benefit from this pest control. However, no possum or stoat control is offered, so benefits to birds are not as high as they could be with this control.

64. As rat control alone is offered, and only seasonally (to benefit bird nesting), accompanying benefits to lizards will be low, as lizards can be vulnerable to rat predation throughout the year. Indigenous revegetation measures will have little impact on bird values but may marginally benefit lizards within 5 years.

Dry Creek

65. No animal pest control is offered – only weed control and supplementary indigenous planting. These actions will have little to no discernable benefit to birds and lizards over a 5 year period.

Southern Gully

66. Weed and possum control is offered for 5 years. Due to the largely seral nature of the vegetation, these actions are likely to have little discernable benefit to nesting birds or lizards populations within the 5 year timeframe. The vegetation will continue to mature and possum control should cause a marginal increase food resources for birds. The lack of rat, stoat, cat and hedgehog control may still result in any lizard population continuing to decline.

PCL (OBDA)

67. Without a land exchange, rat, possum and mustelid control is assumed to continue seasonally for the next 5 years at this site. The vegetation at the site will continue to slowly mature, and with the ongoing pest control, there are likely to be continued benefits to native birds breeding at this site. This should result in a small increase in bird density over 5 years, but a reasonable proportion of successfully fledged birds are likely to disperse out of this small area, providing the benefits of native birds to other sites.
68. It is difficult to suppress predators to such low levels that lizard species benefit, particularly if control is only seasonal. However, this site has the most comprehensive pest control of all the other measures offered at any other site, so there is some likelihood that populations could slowly increase over time. However, this is not likely to be discernable over a 5-year timeframe.

Appendix 1. OVERALL ASSESSMENT – TERRESTRIAL FAUNA

DOC PCL 'Give' Site: **Moderate**

DOC Potential Acquisition 'Get' Sites Overall (Including QEII Covenants): **Moderate-High**

DOC Potential Acquisition 'Get' Sites Overall (Excluding QEII Covenants): **Moderate**

	Representativeness	Diversity	Rarity & distinctiveness	Ecological context (size, shape, connectivity, buffering)	Overall Terrestrial Fauna Value	Terrestrial Fauna values after 5 years if all proffered measures are successfully implemented ^a
DOC PCL 'Give' site						
OBDA	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate^b
DOC Potential acquisition 'Get' sites						
Northern Gully (including QEII)	Moderate	Moderate	Moderate	Moderate-Low	Moderate	Moderate
Northern Gully (excluding QEII)	Moderate	Moderate	Moderate	Moderate-Low	Moderate	Moderate

Firth Block (QEII)	Moderate-Low	Moderate	Moderate	Moderate-Low	Moderate-Low	Moderate
Dry Creek	Low	Low	Low	Low	Low	Low
Southern Gully	Low	Low	Low	Low	Low	Low to Moderate-Low
Total 'DOC Get' (excluding QEII)	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate
Total 'DOC Get' (including QEII)	Moderate-High	Moderate-High	Moderate-High	Moderate	Moderate-High	Moderate-High

^a assuming current pest control continues on PCL (OBDA) area and all measures the applicant has proposed are fully implemented and attain targets for 5 years (so this assessment is for terrestrial fauna values expected in 2031).

^b assuming current pest control measures at this site in Belmont Regional Park continue for another 5 years until 2031.

Appendix 2. Detailed assessment of Belmont Quarry sites – current value of Terrestrial Fauna

Site	Fauna Type		Representativeness				Diversity	Rarity & Distinctiveness	Ecological Context	
			Original Species diversity [Species confirmed (or likely) to be present c.f. original diversity in that habitat type in ED or Region (not including extinct species (e.g. moa) or completely extirpated on mainland (e.g. saddleback), but do include rare on NI mainland, e.g. kaka, kōkako)]	Proportion of regional population [Proportion of each species in current ED or Region (very large sites have higher proportion on average)]	Proportion of original species density [Current population at a site c.f. expected original population at the site (higher score for effective <u>predator</u> control and management e.g. rodents)]	Habitat quality & carrying capacity [Ability of habitat at site to support current populations (and potential to sustain populations in long-term – e.g. include change to habitat quality with forest succession over time); carrying capacity (generally score increases with <u>browser</u> pest control e.g. possums)]	[Current species diversity (number of species) present now (not to be with compared with original diversity). More diversity = higher score. Weighting needed between essential use of site (e.g. territorial and/or nesting sites) with intermittent use (e.g. occasionally seen present) vs traversing (occasionally seen flying over but not landing/feeding/roosting at site)].	[Species present - use national and regional (overall and mainland-only) threat status]	Block Size and Shape [Size & shape that benefits fauna by being sufficient to sustain a population; resilience to pest invasion and ability to undertake effective pest management (larger and squarer block with suitable habitat should score higher)]	Connectedness of site [Connectedness to surrounding natural ecosystems - ease of fauna being able to disperse out of or into block - includes buffering; distance to nearest habitat and ability of current fauna to reach it; % block perimeter connected to suitable habitat]
	Birds	Value	<i>Moderate-High</i>	<i>Moderate-Low</i>	<i>Moderate</i>	<i>Moderate</i>	<i>Moderate-High</i>	<i>High</i>	<i>Moderate</i>	<i>Moderate-High</i>

PCL (Proposed OBDA) ['DOC-Give' site]

	Reasoning	Total area: 23.86 ha Grassland (2.87ha): few/no native birds (falcon, harrier, morepork only) Exotic trees/forest (5.14ha): roosting and perching sites, food for insectivorous birds only Early seral/treefern (low canopy) (8.74ha): likely low density forest birds - insectivorous dominated Mid/Late seral/manuka (7.01ha): 15sp known or likely (e.g. summer monitoring); 6 forest species in wild in Wellington mainland region missing (rifleman, kaka, yellow-crowned kakariki, NI brown kiwi, NI robin, NI kōkako), plus weka (not present on mainland Wellington) Mature forest: none present Wetland (0.23ha): 6 sp. confirmed; 18 possible sp. missing	Small site - doesn't contain significant regional populations of total Wellington population, except falcon. Even 1 pair of falcon using site is significant (<250 adults in Wellington region). Assuming robins not present and RC kakariki only intermittent, assuming both cuckoos present in summer.	Predator control of rats and stoats will have helped maintain and increase bird densities.	Vegetation succession processes proceeding with minimal interference from introduced browsers, so habitat should be recovering to sustain high density of avifauna. Grassland/exotic lowers carrying capacity. Wetland provides foraging habitat but is small and unlikely to support robust populations.	15 forest bird species and 4 known wetland species.	See Table 2 of my report. Caspian tern - Regionally Critical (overall and mainland), Nationally Vulnerable; Falcon - Regionally Critical, overall and on mainland, Nationally Increasing; Long-tailed cuckoo (assumed seasonally present): Regionally Endangered (overall and mainland), Nationally Vulnerable Red-crowned parakeet - Regionally Vulnerable (Regionally Critical on mainland), National - Relict; Pied shag - Regionally Vulnerable (overall and mainland), Nationally - Recovering;	Small area for birds but still able to support the populations of some species. Likely to only be part of home range for most bird species. Square shape maximises chance of a core area with lower pest density with current pest control in place.	Highly connected with 80% perimeter boundary to similar habitat, that is part of wider landscape habitat suitable for forest birds; remaining 20% also available for dispersal and foraging into and out of the block due to high mobility of most forest birds over open areas. Birds found in the wetland highly capable of dispersal and flying across open areas.
	Combined Bird Value	Moderate				Moderate-High	High	Moderate	
Lizards	Value	Moderate-Low	Low	Moderate-Low	Moderate-Low	Moderate-Low	Moderate-Low	Moderate	Moderate-High

	Reasoning	Contains two confirmed species and likely a third species (barking gecko) - with a record approx. 1.2km away in 2021. The site originally likely had 5 other species present (Pacific gecko, Copper skink, Ornate skink, Glossy brown skink and Raukawa gecko), with 4 other species in the Wellington region less likely to have been originally present (Whitaker's skink, Kupe skink, Minimac gecko and northern spotted skink). Several other lizards (and tuatara) are now extinct on the mainland so not considered. the site thus represents possibly 3 of the 12 mainland lizard species in the Wellington region.	A small area compared to habitat available for these species elsewhere in the Wellington region, with apparent low density of lizards	All species likely to have been badly affected by animals pests. Effectiveness of current pest control to achieve bird breeding and protection outcomes is unknown, but should generally be sustaining populations compared to sites with no pest control.	Highly modified in places, with only approx. one quarter of the site having medium quality vegetated habitat	3 species likely present and require year-round habitat	Ngahere gecko is At Risk - Declining in all 3 assessments; Barking gecko (if present) is Vulnerable Regionally & on Regional Mainland, but only Declining on a national scale. Northern grass skink Not Threatened Regionally and Nationally	A relatively small size (24ha) but that is large enough to potentially hold substantial lizard populations should they be able to attain reasonable densities. Shape is square so that maximises the chance of being able to attain a core area of lower pest density	Connected to similar vegetation around 80% of its perimeter, will allow lizards to disperse into and out of the block at high rates. The remaining 20% shares a boundary with a road and overburden site of the current quarry.	
	Combined Lizard Value	Moderate-Low					Moderate-Low	Moderate-Low	Moderate	
		All fauna criteria Value	Moderate				Moderate	Moderate	Moderate	
	OVERALL FAUNA	Total Combined Fauna Value for Site	Moderate							
Northern Gully	Birds	Value	Moderate	Moderate-Low	Moderate	High	Moderate	Moderate	Low	Moderate
		Reasoning	Total Area: 12.63ha Early seral: Likely same as PCL Late seral: Likely same diversity as PCL due to high ability of birds to fly to neighbouring (and distant) areas Mature: Similar diversity to late seral. No wetlands: no wetland birds found in PCL & Firth Block. Hence less diversity overall.	Similar to PCL - small site on regional scale.	Little current pest management (1 short line of stoat traps), so will have limited effect. Mature forest has potential to contain higher native bird densities than seral vegetation.	Mature forest areas should provide good habitat and nesting opportunities for forest birds, but currently has little to no browser control	Common forest species present but no wetland species	NZ falcon and LT-cuckoo likely intermittently use the site	Small area for birds and elongated shape means lower ability to adequately suppress pests and limit pest incursion.	Northern areas well connected but southern areas have limited connectedness, meaning most birds will need to fly across open areas to neighbouring habitat
		Combined Bird Value	Moderate-High					Moderate	Moderate	Moderate-Low
	Lizards	Value	Moderate	Moderate-Low	Moderate-Low	Moderate	Moderate	Moderate	Moderate	Moderate-Low

Reasoning	No known lizards species confirmed at this site, but reasonably likely to have 4 species and possibly 8 of the original 12 mainland species present in Wellington. Suitable habitat for ngahere gecko and close to known populations so highly likely to be present. Habitat marginal for northern grass skink - but possibly present. Parts of the block have had considerably less disturbance than PCL site, so assume also likely to have raukawa gecko, barking gecko, ornate skink and possibly copper skink, glossy brown skink and Pacific gecko.	Likely to have slightly higher density lizard populations than PCL, but still relatively low on Regional or Ecological District scale	Higher quality habitat in mature forest areas than PCL for most lizards species so should have higher populations; but countered by little to no sustained pest control so populations likely low	Higher quality habitat should provide higher carrying capacity in mature forest areas, but with little to no possum control this will be degrading	Up to 7 species could be present; however no survey results means there is uncertainty in how diverse this site really is	Barking gecko has the highest chance of being present in this block(Regionally Vulnerable)	Small area of high quality habitat but still large enough to potentially contain sustainable lizard populations	Northern areas well connected but southern areas not well connected.			
	Combined Lizard Value	Moderate-Low				Moderate	Moderate	Moderate-Low			
	All fauna criteria Value	Moderate				Moderate	Moderate	Moderate-Low			
	OVERALL FAUNA	Total Combined Fauna Value for Site	Moderate								
	Northern Gully excluding QEII site	Birds	Value	Moderate	Moderate-Low	Moderate-Low	Moderate-High	Moderate	Moderate	Low	Moderate-Low
		Reasoning	Total area: 9.66ha Smaller area of mature forest than entire Northern Gully, but likely to have similar diversity of birds that use the site.	Small site on regional scale	Some mature forest provides suitable habitat to sustain a reasonable bird density, but a high proportion of habitat has been disturbed (of low value for native forest birds), and little to no predator control occurring	Mature forest has capacity to sustain a high bird density, but much of this block is also seral and of relatively low value. Little to no possum control occurs in this block reducing habitat quality over time.	Same as Northern Gully - common forest birds present but no wetland birds	NZ falcon and LT-cuckoo likely intermittently use the site	Small and irregular elongated shape	Irregular shape with a relatively low proportion of perimeter adjacent to high quality habitat	
		Combined Bird Value	Moderate				Moderate	Moderate	Moderate-Low		
		Lizards	Value	Moderate-Low	Low	Moderate-Low	Moderate-Low	Moderate	Moderate	Moderate-Low	Moderate-Low

	Reasoning	Similar to entire Northern Gully but smaller site and few if any mature tawa trees so lizard diversity may be less	Considerably smaller area than entire Northern Gully and southern part is likely to be of limited value for lizards	Similar to entire Northern Gully	Higher proportion of low quality habitat than entire Northern Gully block	Similar to entire Northern Gully, although less confident due to smaller area and little if any mature tawa forest	Similar to entire Northern Gully, with less confidence barking gecko is present due to smaller area and little if any mature tawa forest	Largest block is much smaller area than Northern Gully	Good connection to other forest type in northern area but low connection in southern part of block	
	Combined Lizard Value	Moderate-Low				Moderate	Moderate	Moderate-Low		
	All fauna criteria Value	Moderate				Moderate	Moderate	Moderate-Low		
	OVERALL FAUNA	Total Combined Fauna Value for Site	Moderate							
Firth Block (QEII site)	Birds	Value	Moderate-High	Moderate-Low	Moderate-Low	Moderate-Low	Moderate-High	High	Moderate-Low	Moderate-Low
	Reasoning	Area: 9.6 ha Seral vegetation habitat: 8.19ha Mature forest habitat: 1.36ha Similar diversity to PCL with mainly seral vegetation and only a small approx. 1 ha area of mature forest habitat, plus wetland bird species	Small area with mainly seral vegetation and limited numbers of forest birds	Mainly early seral vegetation that doesn't support higher density forest bird populations and limited wetland habitat. No animal pest control limits forest bird density.	Mainly early seral vegetation and no possum control to maintain habitat quality	Likely to have similar diversity as PCL, as forest birds fly to adjacent areas and share wetland site with PCL	Similar to PCL site. Little shag - Regionally Endangered (overall and mainland); Nationally Naturally Uncommon;	Square-shaped block but small area to sustain bird populations	Connected to forest habitat at northern perimeter but most of block has few connections, including precipitous cliff with quarry face on western edge	
	Combined Bird Value	Moderate-Low				Moderate-High	High	Moderate-Low		
	Lizards	Value	Moderate-Low	Moderate-Low	Moderate-Low	Moderate-Low	Moderate-Low	Moderate-Low	Moderate	Low
	Reasoning	2 confirmed species from previous surveys but less likely to have other species present than Northern Gully	Previous surveys have indicated site connected to this (since removed) had reasonable numbers of ngahere gecko	No current pest control so likely a relatively low density population compared to original values	Mainly seral vegetation, but has been demonstrated at adjacent site to be able to hold reasonable density of ngahere gecko; however, relatively low density of other species	Only 2 species known, with lower chance of barking gecko being present than Northern Gully	Ngahere gecko is 'At Risk - Declining' in all 3 assessments; barking gecko has lower chance of being present than Northern Gully due to limited high quality habitat	Square-shaped block that is large enough to sustain lizard populations if present. Difficult site to establish intensive pest control, but appears to be possible due to previous lizard surveys.	Connection with northern PCL but lizard movement inhibited by waterbody (pond). Southern edge isolated from other forest with motorway to the south and western edge meets vertical quarry face with no connectedness for lizard populations	

		Combined Lizard Value	Moderate-Low				Moderate-Low	Moderate-Low	Moderate-Low		
		All fauna criteria Value	Moderate-Low				Moderate	Moderate	Moderate-Low		
	OVERALL FAUNA	Total Combined Fauna Value for Site	Moderate-Low								
Southern Gully	Birds	Value	Low	Low	Low	Low	Low	Low	Low	Low	Low
		Reasoning	Seral vegetation (3.94 ha) provides limited habitat to allow wide diversity of forest birds	Small area and low quality habitat for forest birds means low proportion of regional population	Seral vegetation habitat limits forest bird densities, and no pest control	Seral vegetation limits habitat for forest birds, and no browser control	Low diversity of forest birds in seral vegetation, and no wetland habitat	Unlikely to provide habitat for rare or threatened bird species	Elongated and small shape will limit ability to sustain bird populations even if pest control implemented	Isolated from other forest habitat	
		Combined Bird Value	Low				Low	Low	Low		
	Lizards	Value	Low	Low	Low	Low	Low	Moderate-Low	Moderate-Low	Low	
		Reasoning	Seral vegetation and recent disturbance will limit original lizard diversity	Small area, recent disturbance and low quality habitat means a low proportion of regional lizard populations	No predator control which combined with disturbance and seral vegetation habitat means likely low density lizard populations	No browser control and seral vegetation means habitat quality likely low with limited vegetation refugia at this site	No known species and due to disturbance and seral habitat is likely to have limited lizard diversity	Possibly has ngahere gecko present	Small and elongated shape that will be difficult to sustain lizard populations over time	Isolated from other forest habitat for lizards	
		Combined Lizard Value	Low				Low	Moderate-Low	Low		
		All fauna criteria Value	Low				Low	Low	Low		
	OVERALL FAUNA	Total Combined Fauna Value for Site	Low								
	Dry Creek	Birds	Value	Low	Low	Low	Low	Low	Low	Very low	Low
Reasoning			7.99 ha of mainly seral and weedy vegetation habitat provides limited opportunities for original diversity of forest birds	Small area and low quality habitat for forest birds means low proportion of regional population	Seral vegetation habitat limits forest bird densities, and no pest control	Seral vegetation limits habitat for forest birds, and no browser control	Low diversity of forest birds in seral vegetation, and no wetland habitat	Seral habitat unlikely to provide habitat for rare or threatened forest bird species, but could provide habitat for falcon	Extremely elongated, narrow and irregular shape means pest control even if implemented will be difficult to achieve success for birds by increasing reproductive success	Connection to forested habitat up valley, but most of perimeter connected to weedy or seral vegetation and vehicle tracks	
Combined Bird Value			Low				Low	Low	Low		
Lizards		Value	Low	Low	Low	Low	Low	Moderate-Low	Very low	Low	

All private land sites ('DOC-Get') - excluding QEII sites		Reasoning	Seral vegetation and recent disturbance will limit original lizard diversity	Small area, recent disturbance and low quality habitat means a low proportion of regional lizard populations	No predator control which combined with disturbance and seral vegetation habitat means likely low density lizard populations	No browser control and seral vegetation means habitat quality likely low with limited vegetation refugia at this site	No known species and due to relatively recent quarry disturbance and seral habitat is likely to have limited lizard diversity	Possibly has ngahere gecko present	Extremely elongated, narrow and irregular shape means pest control even if implemented will be unlikely to achieve success for lizards by protecting adults and young from predation	Connection to forested habitat up valley, but most of perimeter mainly connected to weedy or seral vegetation and vehicle tracks
		Combine Lizard Value	Low					Low	Moderate-Low	Low
		All fauna criteria Value	Low					Low	Low	Low
	OVERALL FAUNA	Total Combined Fauna Value for Site	Low							
	Birds	Value	Moderate	Moderate-Low	Moderate-Low	Moderate	Moderate	Moderate-High	Moderate-Low	Moderate
		Reasoning	Area: 21.27 ha Seral vegetation habitat: Mature forest habitat: Similar original forest bird diversity as PCL as some mature forest present but no wetland bird species	Mainly seral vegetation but a small area of mature forest	Mainly seral vegetation so current bird densities likely not as high over most of this Site as when including QEII sites.	Mainly seral vegetation (with limited proportion of mature forest) and limited ability to support forest birds over seral vegetation areas, and no possum control reducing habitat quality for forest birds	Common forest birds plus falcon and seasonal LT-cuckoo	Falcon, LT-cuckoo, red-crowned parakeet	Several smaller blocks each of which are unlikely to support robust bird populations, and also have less resilience to invasion than larger sites	Smaller blocks provide limited connectedness for birds to suitable habitat
		Combined Bird Value	Moderate					Moderate	Moderate-High	Moderate
	Lizards	Value	Moderate-Low	Moderate-Low	Moderate-Low	Moderate	Moderate-Low	Moderate	Moderate-Low	Moderate-Low
		Reasoning	Mainly seral vegetation with presumed limited original lizard species diversity	Limited high quality habitat area for most lizard species	Likely a low density of lizards compared to original populations, and no current or recent effective predator control	Limited high quality mature forest habitat and no browser control will provide more limited refugia in vegetation	Limited areas of mature forest vegetation and seral vegetation	Similar to Northern Gully (excluding QEII)	Relatively small and isolated blocks vulnerable to sustained pest incursions if pest control attempted	Only a relatively small component of the perimeter is well connected to adjacent suitable habitat
	Combined Lizard Value	Moderate-Low					Moderate-Low	Moderate	Moderate-Low	
	All fauna criteria Value	Moderate					Moderate	Moderate	Moderate	
OVERALL FAUNA	Total Combined Fauna Value for Site	Moderate								

All private land sites (including QE II sites)	Birds	Value	Moderate-High	Moderate	Moderate	Moderate-High	Moderate-High	High	Moderate	Moderate
		Reasoning	Area: 33.75 ha, so larger than PCL and likely to contain same original diversity of forest birds and wetland birds as PCL	Largest area and with most high quality vegetation, along with wetland site to support native bird species. Close to other sites with pest control and relatively easily accessed by most bird species from these sites, so likely to be benefiting from adjacent pest control.	Contains some mature forest as well as a small wetland, with adjacent pest control benefitting mobile bird populations that can access the site	Areas of mature forest but offset by large areas of seral vegetation and no current or recent possum control reducing overall habitat quality for forest birds; contains limited wetland bird habitat	Common forest birds, falcon, LT-cuckoo plus wetland birds present in pond	Falcon, LT-cuckoo, red-crowned parakeet, plus Caspian tern and pied shag	Larger area but irregular, elongated and disjointed shape	Some areas well connected but large parts of the block not well connected to adjacent habitat
		Combined Bird Value	Moderate-High				Moderate-High	High	Moderate	
	Lizards	Value	Moderate	Moderate-Low	Moderate-Low	Moderate	Moderate	Moderate	Moderate	Moderate
		Reasoning	Larger area than PCL and could contain up to 7 lizard species	Small site compared to habitat available in Wellington region and Ecological District	Likely a low density of lizards compared to original populations, as predation over many decades and no current or recent effective predator control	Area of high quality mature forest, but tempered by recently disturbed seral vegetation and no browser control limiting vegetation quality for lizards	Has the most habitat types, including largest area of mature forest, with up to 7 lizard species potentially present	Similar to Northern Gully	Larger area that has potential to sustain robust lizard populations; however pest control difficult in some areas	Greater length of perimeter is connected to suitable habitat than the individual sites considered alone, but connectedness is limited over much of the perimeter of the blocks
		Combined Lizard Value	Moderate				Moderate	Moderate	Moderate	
		All fauna criteria Value	Moderate-High				Moderate-High	Moderate-High	Moderate	
	OVERALL FAUNA	Total Combined Fauna Value for Site	Moderate-High							

Response to comments on draft Belmont Quarry land exchange report

Author:	Rhys Burns
Discipline:	Terrestrial fauna
Date:	30 June 2026

1. Introduction

This is a response to the comments received on my Statement of Advice (dated 28 May 2026) regarding the proposed land exchange for the Belmont Quarry Fast-Track application.

2. Response to comments from Winstones

2.1. Technical memo on Lizards by Tony Payne (Blueprint Ecology Ltd)

Mr Payne has responded to my earlier Statement of Advice. The main criticism Mr Payne provides about my Statement is my view that more work could have been done to further understand the density of lizard species in each land parcel. I acknowledge that Mr Payne had practical constraints of time, and I consider the survey work he did within that time to be appropriate and prioritised at the 'DOC Give' site, using suitable methods.

Mr Payne also contests my suggestion that he could have, in addition to the methods used, also used closed cell foam covers to better detect geckos. He reasonably points out that the 'DOC-Give' site only has relatively small trees, and the closed cell foam method requires large trees. I think this is a reasonable assumption. However, I think the method could have been adapted to make smaller closed cell foam covers that would have fitted on the smaller stature trees. My suggestion also included using this method at all the 'DOC-Get' sites such as the Northern Block and Firth Block, which do contain mature large trees that would be suitable for this method, using the standard-sized closed cell foam covers. This would have required more resources (effort and time) than Mr Payne was able to devote to this survey.

The feasibility and effectiveness of ground pest control is questioned. However, I consider this to be a relevant factor, due to:

- (i) ground-based animal pest control is currently occurring in the 'DOC-Give' area, so benefits to terrestrial native fauna should have accrued at this site

- (mainly birds – as lizards are constantly highly vulnerable to predation by introduced mammals), and will continue if this pest control is maintained;
- (ii) the applicant has offered that pest control should occur over the ‘DOC-Get’ sites, so raising the feasibility of achieving this in practice, is relevant.

2.2. Technical memo by Graham Ussher

Section 3 – I agree with Dr Ussher that a 20-year pest control timeframe would result in better ecological outcomes for the sites. As Dr Ussher describes, the applicant should declare what they are trying to achieve at each site (e.g. condition or ecological integrity at each site), and from there decide the appropriate management timeframes that are most likely need to achieve these.

Section 4 – Dr Ussher criticises DOC’s approach to scoring the land parcels, and concludes that DOC has, in part, not taken into account the size of each parcel. In my Statement of Advice for Terrestrial fauna, I did take into account the land parcel size – this was mentioned in the text of the various tables in that report. I agree with Dr Ussher that the DOC approach is less qualitative than the BlueGreen Ecology approach, making aspects such as land parcel size less obvious in the DOC assessment. However, I think the BlueGreen Ecology approach is not perfect either. For example, it assumes a linear increase in value for each condition score, which is unlikely to be true ecologically (I consider the direct relationship is essentially unknowable due to the complexity of ecosystems, but is more likely to be exponential than linear). The DOC approach could potentially be seen as more holistic (compared to more reductionist for the BlueGreen Ecology approach), with more reliance on expert opinion that takes into account a range of scoring for a number of conservation values.

Section 5 – my understanding is that if the QEII sites are discounted, the assessment does not include values protected by the covenant.

The pest control (possum control only) offered in the 13ha of Package B in Belmont Regional Park, will, in my opinion, provide no additional benefit to the conservation values of this site. This is because possum control is already occurring at this site (by Greater Wellington Regional Council (GWRC)), so this offers no additional benefit. Dr Ussher states that this possum control alone will provide benefits to native birds and lizards. However, without control of ship rats (and ideally mustelids), I consider the outcomes for these species by possum control only will be negligible. Although rat control over this 13 ha is currently undertaken by GWRC, I consider any benefits to native birds and lizards would largely be due to GWRC efforts, so I don’t believe that Winstone’s can legitimately claim this additionality as resulting from their efforts.

2.3. Technical memo by Dr Hazel Burrridge (bats)

I am satisfied with the explanation provided by Dr Burrridge, and have no further comment.

2.4. Winstones Improvement Package A

2.4.1. Improvements offered

Package A proposes measures to undertake and measure mammalian pest management in 3 blocks (Northern Gully, Southern Gully and Firth Block).

Possum control is suggested at 2 per ha at both Northern Gully and Southern Gully). However, as the blocks are so small, I consider this is inadequate. In my opinion, there should be a possum trap every 50m along the boundary of these blocks, and then a grid of 50m internally between traps. The table also doesn't indicate how many times the traps will be checked, reset and rebaited each year. I consider this should happen once per month (12 times per years).

For the Northern Gully, rats are also listed as a target species, but no method or target is shown. In my view, the method should be bait stations set on a 50x 50m grid, plus 50m spacing around the perimeter – i.e. similar to my proposed possum setup above.

The rodent control area in the Firth Block is not specifically defined, and should be a minimum of 50 x 50m, with 50m spacings along the perimeter. Traps are proposed to be used, however I consider that only self-resetting traps should be used to provide greater confidence in being able to achieve a result that is likely to benefit conservation values. These traps only need to be checked every few months, reducing the labour cost of servicing non-resetting traps.

2.4.2. Conditions

Condition 28 (Table 3): outlines the proffered mammalian pest control management. However, no quantitative targets are offered. The column 'Response trigger' is a qualitative target; it is neither a trigger level nor a response that will be invoked if a target is not achieved. In addition, the method by which observations will be made by a contractor are not provided, so the suitability of this approach for each pest species cannot be assessed. The suggested 'Response trigger' in Table 3 doesn't follow any best practice or standard methodology, and doesn't try to measure the

crucial element of best practice pest control monitoring – the number of animal pests remaining, i.e. those pests that have not been killed and continue to do damage to terrestrial fauna values at the site.

Overall, I consider the proposed animal pest targets and response if any targets are not achieved are not satisfactory. This is because there is uncertainty that any conservation values affected by mammalian pests will achieve any substantive beneficial outcomes.

Condition 39: 10 Working Days is not sufficient. In my view, this should be at least 30 Working Days to provide greater certainty that DOC can adequately find resources in future to consider any changes to the plan. Any DOC time used to consider any changes to plans should be cost recoverable by DOC.

Condition 43: any contamination should also be assessed for potential adverse impacts on native fauna, not just human health requirements.

2.4.3. What is the conservation value rating of Package A

For the Mammalian Pest Management Plan there are no reliable specific, measurable targets, no trigger thresholds if targets are not met, and no additional measures provided if thresholds are breached.

2.5. Winstones Improvement Package B

2.5.1. Improvements offered

Package B offers, in addition to Package A, planting and pest control in the Belmont Regional Park. The main potential benefit that this package offers for terrestrial fauna is possum control for 10 years over 13 ha within Belmont Regional Park. However, the purpose of the possum control is to assist the successful establishment of swamp maire and ramarama, so there are no specific benefits aimed at terrestrial fauna with Package B.

2.5.2. Conditions

Condition 26: offers the Mammalian Pest Management Plan 20 days before settlement. In my view, this should be 30 Working Days to provide greater certainty that DOC can adequately find resources in future to consider any changes to the plan. Any DOC time used to consider any changes to plans should be cost recoverable by DOC.

Condition 29: same comments as Package A – Condition 28.

Condition 40: any amendment change to the Plan should allow at least 20 Working Days for DOC to respond. This will provide greater certainty that DOC can adequately find resources in future to consider any changes to the Plan. Any DOC time used to consider any changes to plans should be cost recoverable by DOC.

Condition 41 (b): reducing pests over a calendar year is not usually how animal pest populations work. They generally increase in spring/summer as breeding occurs, and naturally decline over autumn/winter as resources become scarcer. In my view, having a regular (calendar-based) monitoring regime with targets and thresholds above which further management actions are triggered, is more appropriate than showing there is a decline over a calendar year (i.e. between January and December).

Condition 45: any contamination should also be assessed for potential adverse impacts on native fauna, not just human health requirements.

2.5.3. What is the conservation value rating of Package B

Low. In addition to Package A, only possum control is offered over 13 ha. No residual possum targets have been set and no triggers are listed to compel additional measures if targets are not achieved. As in Package A, the ‘measurable objective or outcome’ are uncertain, inadequate and not standard practice.

3. Discussion

There is already control of possums using toxic bait in bait stations at the proposed 13 ha site offered in Package B (in addition to rat control by the same measure and mustelids by trapping) by Greater Wellington Regional Council (GWRC) as part of a much larger area of animal pest control (Fig. 3 in my Statement of Advice). Unless it is known that GWRC intend to discontinue this pest control, I consider there would be little to no benefit to terrestrial fauna in further possum control taking place within the 13ha site.

The use of 26 ‘Flipping Timmy’ traps over the 13ha will kill some additional possums, particularly over the winter period when bait stations are not having toxic bait deployed. However, most terrestrial fauna (particular birds) are not known to be

vulnerable to possums during the winter season when they aren't nesting, so I do not consider any additional benefit to birds will accrue.

The effectiveness of the Flipping Timmy traps is also dependent on the frequency with which they are checked, rebaited, relured and reset, which hasn't been described in the proposed Conditions.

After considering the responses of the applicant to my Statement, I consider the conservation values outlined in my Statement following implementation of the offered improvements, would not change with the implementation of Package A and B.

4. Recommendation

Condition 27 (Package A) and Condition 28 (package B) – needs to state the measurable targets for each pest species. In my view, these are fundamental and so should be in the conditions, as relying on yet to be developed management plans means there is uncertainty of conservation results and outcomes.

Table 3 (in Conditions of both Packages) needs to be amended to clearly show:

- a. measurable pest control targets (using suitable methods) for each pest species that will likely result in conservation gains for native species at the land parcels
- b. threshold triggers; and
- c. additional measures to be deployed if thresholds are breached.

Before the Fast-track Panel

Under: Fast-track Approvals Act 2024

In the matter of: FTAA-2603-L003 – Belmont Quarry Project – Land Exchange

Statement of advice: Jeremy Head

Landscape

Independent consultant

26 May 2026



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Introduction

1. My full name is Jeremy Everett Head.

Instruction

2. I have been requested to provide expert advice on behalf of the Director-General of Conservation for her section 35 land exchange report required to be prepared under the Fast-Track Approvals Act 2024, for the Belmont Quarry project land exchange application.

Qualification and Experience

3. I am an independent Consultant Landscape Architect based in Christchurch. I have a Bachelor of Landscape Architecture (Hons) from Lincoln University (1993) and am a registered member of the Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA). I have over 30 years' experience as a Landscape Architect including eight years experience working at Lucas Associates and four years experience working for WSP in Christchurch where I held the role of South Island Team Leader Urban Design. Otherwise I have been self-employed. My role in this project to date has included a peer review of the Applicant's Landscape Assessment and a site visit.
4. I have a good understanding of the Applicant's Landscape Assessment of the land exchange where the various land parcels are located around Belmont Quarry, Lower Hutt.

Code of conduct

5. Whilst it is acknowledged this is not an Environment Court Proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this advice is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of advice and expert opinion

6. My expert advice relates to the following:

- i. Adequacy of the Applicant's Landscape Assessment, including identification of any valued attributes that have not been assessed or have been insufficiently characterised.
- ii. Adequacy of the Applicant's assessment of effects on existing natural landscape character and its values with specific reference to any values that are incomplete, understated, or not addressed.

Material Considered

7. In preparing this advice I have reviewed and rely on the following documents as part of the land exchange application:
 - **Belmont Quarry Overburden: Land Exchange Landscape Assessment; 1** December 2025 prepared by Rhys Girvan, Senior / Principal Landscape Planner, Boffa Miskell Ltd (Appendix B6a of Application).
 - **Terrestrial Ecological Report** (draft) prepared by Rhys Burns for Department of Conservation (April 2026)
 - **Freshwater Ecological Report** (draft) prepared by Jacob Williams for Department of Conservation (April 2026)
 - **Botany Ecological Report** (draft) prepared by Matt Ward for Department of Conservation (April 2026)
 - **Recreation Report** (draft) prepared by Michael Harbrow for Department of Conservation (April 2026)
 - **Heritage Report** (draft) prepared by Richard Nester for Department of Conservation (April 2026)
8. I have attended weekly Teams calls with Department of Conservation (DOC) experts since 11 March to contribute, share and discuss others' assessments of the different land parcels and their varied attributes. This has enabled me to better and more fully assess the landscape characteristics of each land parcel.
9. I undertook a site visit on 24 March 2026.

Summary

10. This statement of advice ('statement') has been requested by the Department of DOC to assist it with preparing the Director-General's report for the Fast-track Panel in respect of Winstone Aggregate's Land Exchange Application. Part of this statement considers the Applicant's landscape effects assessment prepared by Rhys Girvan of Boffa Miskell (the 'BML Landscape Report'). This statement includes a review of the Applicant's assessment methodology and findings regarding the valued attributes of the five land parcels¹ as they currently exist. I understand that any proposed changes to the land parcels that may occur in the future subject to the land exchange being approved are not within scope of this Application. Such changes may include vegetation removal and earthworks and its replacement with quarrying activity and in other areas the restoration and enhancement of natural landscape character. In this regard, the existing natural landscape character values of the various land parcels, and how the values of these land parcels contribute to the wider landscape forms the focus of this statement.
11. For ease of cross-referencing back to the BML Landscape Report where I provide comment on a point made, I include the page number from the BML Landscape Report in brackets (e.g. [XX]).

Methodology

12. A site visit was undertaken on 24 March 2026 where I was accompanied by Mr Girvan. We walked into the OBDA 'Give' block from near its northernmost and localised high point down to a point close to the parcel's southern boundary. We also walked into the 'Southern Gully' (Get) block from Liverton Road. We observed the 'Dry Creek' (Get) block from the existing Dry Creek quarry roading. We also observed all the various land parcels from the same or similar viewpoint locations in the wider contextual setting that Mr Girvan used in his Landscape Report.

¹ Referred to in the Landscape Report as: 'Dry Creek', 'Firth QE11 Block', 'Northern Gully' and 'Southern Gully' (4 x 'Get' blocks) and the 'Proposed Overburden Disposal Area' or 'OBDA' (the 'Give' Block).

13. The peer review methodology I have used is based on that set out in Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines (TTatM) and utilises information lodged by the Applicant and DOC. As such this statement is largely desktop-based, informed by a site visit. The widely accepted NZILA Seven-Point scale has been used to help describe the landscape quality, the same scale that Mr Girvan has used.
14. This statement forms an impartial and focussed appraisal of the BML Landscape Report and is not a parallel assessment.

Natural Landscape Character

15. In this statement I use the terminology ‘natural landscape character’. This is not the same as ‘natural character’ which is an RMA term used exclusively for S6(a) matters – *‘the preservation of natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development.’* While some land parcels include wetlands, (small) lakes and rivers and their margins, I use the term ‘natural landscape character’ to mean the distinct combination of each land parcel’s natural characteristics and qualities, including its degree of naturalness. As mentioned above, a determination of levels of natural landscape character has been made based largely on available reporting both from the Applicant and DOC.

QEII Covenants

16. I understand that the areas mapped as QEII Covenant comprised partially modified landforms prior to the placement of the QEII covenants. They were not fully natural landscapes. Modifications included quarrying activity and earthworks and native planting to varying degrees. I understand that drainage works including earthworks to form artificial channels to control stormwater including inside the QEII covenant area at the Northern Gully land parcel was implemented prior to the covenants being put in place. I also understand from discussions with DOC experts, that while these covenanted areas are fully clothed in vegetation cover now, these areas are not highly natural and in terms of natural landscape character are little different to adjacent non-QEII areas. From my own site

observations, parts of the QEII covenanted areas still retain an expression of layered horizontal earthworks patterning (Firth Block). However, (any) areas protected via QEII covenant will by definition have higher associative shared and recognised values than areas that do not have this protection².

Points of Agreement with the Applicant's Landscape Report

17. In general, I agree with the content of Sections 1.0, 2.0, 3.0, 4.0 and 5.0.
18. The 'DOC-give' areas will not visually change much (if at all) when viewed from afar – especially to the layperson.
19. Putting the landscape quality of each land parcel to one side, the Firth Block and Dry Creek land parcels do not in my opinion contribute 'fragmentation' but rather would consolidate the broader vegetated setting.
20. The zone of theoretical visibility (ZTV) analysis is useful and accords with observations made during the site visit. Further, the limitations of ZTV analysis are correctly stated (Section 5.1).
21. The methodology in selecting public viewpoint locations is logical and represents an appropriate range of views (Section 5.2).
22. The BML Landscape Report considers the land parcels as they are now, and that any proposed physical changes would be assessed when the substantive proposal is applied for.
23. The BML Landscape Report is focussed on the physical, perceptual and associative attributes of the various land parcels, after which an evaluation is made. Visibility and landscape capacity of each land parcel are addressed separately. Regarding capacity, I agree with the discussion in the BML Landscape Report (Section 7.0) and note that capacity will be a relevant matter only when the substantive application is being assessed.

² QEII National Trust Open Space Covenant 5-07-755; Background (C) "*The Covenantor [Fletcher Concrete and Infrastructure Limited] wishes to protect and preserve **certain significant natural environmental values and open space values** on the Covenant Area as defined in this deed.*" (9 November 2025). My emphasis added in **bold**.

24. The solid line inside the heavier dashed line around the OBDA on the 'Belmont Quarry Land Exchange Concept Plan' represents an area that may or may not be physically modified in the substantive application.

Limitations / Information gaps

25. There is only brief mention of specific 'landscape natural character' (elements, patterns and processes), such as hydrology - how water flows across the land including to, over and downstream of the land parcels, a description of the wetland areas in terms of their natural quality, occurrence of mature / noteworthy native trees, levels of biodiversity and their respective values. A more detailed / nuanced acknowledgement (including reference to other's reporting) to these valued attributes would help influence / underpin / strengthen the subjective aspect of the overall evaluation of natural landscape character.
26. To help the Panel, it would assist readability if the A3 photographic viewpoint graphics (pages 9 – 13) illustrated the vegetation cover 'deleted' from the 'DOC-give' / OBDA; or the OBDA area was somehow 'picked out' better (e.g. outlined / hatched). This would highlight the relative location / visibility of the various land parcels better. The overlapping arrowed extents are difficult to follow in places.
27. The photographic viewpoint locations are missing from Figure 4 which includes the ZTV analysis for the OBDA land parcel.
28. ZTV analysis is mostly relevant when a physical change to (any) landscape setting and an assessment of those effects is critical. In other words, a mapped ZTV viewshed indicates the extent of those potentially affected following a landscape change. In the case of this application which is limited to a legal land exchange process and outcome, the outward appearance of the five land parcels will not alter, and further, the outward appearance of all five land parcels which are presently fully vegetated is very similar.
29. I don't believe the area's role as the scenic backdrop (visual attribute) to the Hutt Valley will be 'maintained' (BML Landscape Report, Section 8.0, second bullet point) following the substantive and future changes to the area - if the land exchange is approved. While to a degree 'visually contained', the OBDA land

parcel still forms a part of the visible scenic backdrop. The other visible 'DOC-get' land parcels will change little visually if at all. Therefore, if the land exchange is approved, one area will change while four will not. Overall, there will be a net loss in landscape quality in the future.

30. Notwithstanding the above, though the BML Landscape Report does not address actual change (which is the correct approach), there is no 'general' discussion on the implications of the 'edge effect' or 'fragmentation' regarding the five land parcels. Put simply, edge effects occur where different habitats meet - in this case where increased levels of sunlight and temperature, greater exposure to damaging winds and reduced levels of humidity will likely occur. Risk of fire is also increased as the length of edge increases. Edges can create a non-natural 'transition zone' of sorts which may adversely affect plant growth and the composition of and levels of biodiversity which may have to relocate to more internal locations in the adjacent vegetation cover.
31. The OBDA land parcel includes a 'hollowing out' of an area of largely intact native vegetation albeit in its early stages of succession creating an approximately 1,550 m long 'front' which would be vulnerable to weed invasion, requiring ongoing management. Currently the edge of the 'Give' land parcel with the quarry is approximately 360 m long or some 75% shorter in length.
32. The Dry Creek 'Get' land parcel partly includes rehabilitated quarry land and an approximately 1,050 m long edge adjacent to the existing former quarry site which appears to have a considerable weed infestation problem, requiring urgent management now.
33. The southern 'panhandle' of the Northern Gully and the Southern Gully 'Get' land parcels form a relatively narrow 100 m – 150 m wide 'peninsula' largely comprising 'edge' as opposed to 'patch' extending into a developing rural-residential area. This developed area may be the source of an ongoing spread of animal and plant pests.
34. The existing 'edges' to Belmont Regional Park adjacent to and forming part of the 'Get' land parcels are approximately 2,400 m long, combined. The total lengths of the additional edges of the 'Get' land parcels is approximately 4,350 m. In addition

to this, the 'Give' land parcel currently has an approximately 360 m long edge with the quarry. As proposed, the length of edge for the 'Give' land parcel will increase to approximately 1,550 m. This represents a net increase of approximately 3,140 m of edge that may be susceptible to various risks that DOC will need to manage.

35. Fencing and its ongoing maintenance has not been addressed but will need to be considered by the future landowner/s.

Natural Landscape Character (natural elements, patterns and processes)

36. Ecological values / levels of biodiversity are touched on briefly but should form a more transparent contribution towards a description of the various land parcels' levels of natural landscape character.
37. A description of water bodies, the extent and health of wetlands, length of streams / catchments, hydrological patterns and the natural qualities of these features is touched on briefly. More information on the contribution these features make to each land parcel would enable a deeper understanding of the levels of natural landscape character.
38. An approximate area / proportion of native vegetation cover versus exotic vegetation and weeds versus open pasture quantified for each land parcel would assist with better understanding the levels of natural landscape character in each land parcel. As would any information on animal pests, their habitats and movement.
39. There is no visual sensitivity finding for the OBDA land parcel. However, the term 'visual sensitivity' implies landscape change which this Application does not include.
40. The BML Landscape Report does not summarise all the various findings together in one place which would make a comparison between each land parcel clearer. As such I have assembled the **Table 1** (page 12) using the various findings from the BML Landscape report. Of note, the BML Landscape Report records both a 'Low-moderate' [6.5.5] and 'Low' [7.3] visibility finding for the Southern Gully. When assessing Table 1, the overall landscape value is highest at the Firth Block, and

slightly lesser at the Northern Gully Block. The other three blocks are essentially similar. From my own observations, I would suggest that the overall landscape value of the Dry Creek land parcel should be lower than the other land parcels at 'Low-moderate' (**Table 2** page 13).

Summary of landscape values for each land parcel

41. At Section 6.0, the BML Landscape Report steps through a description of the various attributes of each land parcel and concludes with an overall evaluation. As mentioned above, I do not dispute any of the *descriptive* text in this part of the BML Landscape Report and further, the descriptions accord with my own observations made during the site visit. This section of my statement utilises further information provided by DOC's experts that in my opinion enable a fuller understanding of the natural landscape character values of each land parcel that may be of benefit to the Panel.

OBDA / 'DOC Give' land parcel

- Source water for downstream wetlands and several streams that eventually flow into the Hutt River (tributaries).
- The wetlands (0.23 ha) and waterways that are present have not been modified in recent times and have well-vegetated riparian margins in a 'natural' state.
- Regenerating wetland forest, including 'good quality' wetlands within the area as well as directly to the northeast of the land parcel.
- Vegetation includes some Nationally Threatened plant species.
- Ridges between the arms of the headwaters include large 'old man' pine, macrocarpa and regenerating kamahi or manuka type forest.
- Edges are sound without obvious areas for weed species invasion.
- The flat area in the central / north part of the land parcel once included farm buildings, where the area is now mostly in large macrocarpa with some open exotic grassed areas.

- No planting or major earthworks are present, other than an old pylon access track / farm road.
- Approximately 340 m long edge with the quarry.

Northern Gully / 'Get' land parcel (partly includes QEII covenant)

- There is an area directly adjacent to the Belmont Regional Park which includes 'good quality' kamahi / pukatea along the margins of several tributaries.
- The land parcel includes landform modifications including the dumping of material. In addition, approximately one third of the area includes a channelised watercourse / modified stream.
- There is a small area of natural regeneration along the central western edge of the 'Cottle Block' adjacent to neighbouring private property.
- Part of the topography has been re-shaped and re planted due to quarrying activity.

Southern Gully / 'Get' land parcel

- This area was historically cleared for pastoral grazing and is now clothed in regenerating native (largely mahoe) and exotic vegetation cover including blackberry and gorse which has overgrown the area in places.

Firth Block 'Get' land parcel (overlain with QEII covenant)

- Some wetlands present.

Dry Creek 'Get' land parcel

- This area includes an ex-quarry site that is very weedy but includes some natural regeneration of native plant species through the weed cover.
- The central area (outside the Application) is essentially fully clothed in weed cover which may spread into the 'get' part of the land parcel.

- Given the additional information and site images provided by DOC's experts, some landscape values differ slightly from the Applicant's, set out in **Table 2** page 15.

	Physical attributes	Perceptual attributes	Associative attributes	Visibility	Visual Sensitivity	Overall Landscape Value
OBDA	Moderate	Moderate	Moderate	Low-moderate	No finding	Moderate
Northern Gully	Moderate-high	Moderate	Moderate-high	Low	Low to High	Moderate-high
Firth Block	Moderate-high	High	Moderate-high	High	Low to High	Moderate-high
Dry Creek	Moderate	Moderate	Low-moderate	Low-moderate	Low to Low-moderate	Moderate
Southern Gully	Moderate	Moderate	Low-moderate	Low-moderate / Low	Low to Low-moderate	Moderate

Table 1 – Summary of findings from the BML Landscape Report

Landscape values for each land parcel following improvements made by Applicant

42. In the Land Exchange Report at [10.8] – [10.14] and in Section 13, several improvements to the DOC-Get land parcels are outlined. These improvements proffered by the Applicant include weed and animal pest eradication and control and the relocation and/or replanting of native species. The following discusses the likely change to the existing landscape values at each land parcel on the seven-point scale if the improvements are successful. A comparison / summary is provided in **Table 2**.

Northern Gully / 'Get' land parcel

- A 'Moderate-high' to 'High' overall landscape value. This improves on the 'Moderate-high' value with no improvements in place. The increase is based on the combination of animal pest control and weed eradication enabling improvements to the forest understorey and the substantial removal of exotic canopy species which would otherwise continue to self-seed into the native forest cover. Of note, while the target species include goat and

possum, Old man's beard, Tradescantia, and 'potential' canopy trees, there will be other plant and smaller animal pests (e.g. mustelids) likely to be present or at least able to invade. Blackberry and Pampas grass is noted by the Applicant as occurring in the adjacent Southern Gully block, and also in the adjacent Belmont Regional Park.

Southern Gully / 'Get' land parcel

- A 'Moderate' overall landscape value – no change to the previous overall landscape value rating. While the Applicant proffers the establishment of 200 Swamp maire, there is no measurable outcome or objective regarding weed and animal pest eradication and control.

Firth Block 'Get' land parcel (overlain with QEII covenant)

- A 'Moderate-high' to 'High' overall landscape value – no change to the previous overall landscape value rating. Measurables include 90% establishment within the quarry edge. While this will be an improvement, it is not enough to increase the value higher. It is unclear whether weed and animal pest eradication and control is a measurable objective or outcome in this area.

Dry Creek 'Get' land parcel

- A 'Moderate' overall landscape value. This improves on the previous 'Low-moderate' overall landscape value rating. The increase is based on 90% weed eradication, canopy closure, natural regeneration and the beginnings of natural ecological processes over the entire land parcel and 90% plant establishment within the 'supplementary planting area' shown on the Boffa Miskell Landscape Appendix B6a. Of note no animal pest control is proffered in this land parcel which will have some level of negative effect on any new or regenerating vegetation particularly.

43. The above findings align with the fact that the Applicant does not proffer the same level of weed and animal pest control in all DOC-Get land parcels. Given that many weed species and animal pests will likely be present in all the land parcels, or able to invade all the land parcels from adjacent areas, this introduces a

weakness in the Applicant's measurable objectives and outcomes. In my opinion the eradication and ongoing control of animal and plant pests is more important than replanting or transplanting plant species. Further, it would provide a greater level of certainty if the Applicant also proffered robust conditions regarding planting methodology, protection and replacement.

	Physical attributes	Perceptual attributes	Associative attributes	Visibility	Overall Landscape Value	Where change in findings with BML report (Table 1)	Overall Landscape Value where the proffered improvements are successful*
OBDA	Moderate	Moderate	Moderate	Low-moderate	Moderate	No change	N/A or Moderate 'plus'**
Northern Gully (excludes the QEII part)	Moderate-high	Moderate	Moderate-high	Low	Moderate-high	No change	Moderate-high to High
Northern Gully (QEII part only)	Moderate-high	Moderate	Moderate-high to High	Low	Moderate-high	Change to Associative attributes. Note no change to overall landscape value	Moderate-high to High
Firth Block (QEII)	Moderate-high	High	Moderate-high to High	High	Moderate-high to High	Change to associative attributes and overall landscape value	Moderate-high to High
Dry Creek	Low-moderate	Low-moderate	Low-moderate	Low-moderate	Low-moderate	Change to physical and perceptual attributes and overall landscape value	Moderate
Southern Gully	Moderate	Moderate	Low-moderate	Low-moderate / Low	Moderate	No change	Moderate

Table 2 – Summary of findings / opinion from the preceding Statement by J. Head. Also note I have omitted a 'visual sensitivity' column, as 'visual **sensitivity**' implies landscape change.

* Finding based on the '**Measurable objective or outcome**' for entirety of each block (7 December 2025 Land Exchange Report – [10.8], page 79).

** N/A – any natural landscape value will be largely extinguished over time through quarrying activity. In the event the land parcel exchange did not occur, it is assumed that through ongoing weed and animal pest control, the landscape values of the land parcel would gradually improve. To what extent is uncertain and is time-dependant. As such an assumption is made that there will be an improvement, as opposed to a neutral effect or degradation over time in this scenario.

Overall assessment

44. Rating of the OBDA / DOC 'Give' site: **Moderate (now)** and **Moderate 'plus'** over time through ongoing and successful animal and weed control if the land parcel exchange did not occur.
45. Rating of each of the DOC 'Get' sites:
- Northern Gully / DOC 'Get' site (includes QEII area): **Moderate-high**
 - Northern Gully / DOC 'Get' site (excludes QEII area): **Moderate-high**
 - Firth Block / DOC 'Get' site: **Moderate-high to High**
 - Dry Creek / DOC 'Get' site: **Low-moderate**
 - Southern Gully / DOC 'Get' site: **Moderate**
46. Overall rating of the DOC 'Get' sites:
- i. Overall rating of the DOC 'Get' sites not accounting for the QEII area within the Northern Gully block – **'Moderate' - 'Moderate-high'**.
 - ii. Overall rating of the DOC 'Get' sites accounting for the QEII area within the Northern Gully block – **'Moderate' - 'Moderate-high'**.
 - iii. Overall rating of the DOC 'Get' sites with the Applicant's proffered improvements accounted for – **'Moderate-high'**.



Jeremy Everett Head

Registered NZILA Landscape Architect

26 May 2026



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Response to comments on draft Belmont Quarry land exchange report

Author:	Jeremy Head
Discipline:	Landscape and Natural Character
Date:	6 July 2026

1. Introduction

I peer reviewed the Applicant's 1 December 2025 Landscape Assessment prepared for Winstone Aggregates which included a site visit with Rhys Girvan – author of the Landscape Assessment on 24 March 2026. I prepared an Advice Statement for the Department of Conservation (DOC) dated 26 May 2026 and have read Mr Girvan's response to that document. I have also read the Friends of Belmont Regional Park's (FoBRP) comments, the Landscape Dynamics hydrological technical memorandum and the Applicant's Planner's comments on DOC's draft report concerning the land exchange. I comment on several matters below.

My qualifications and expertise, and agreement to comply with the Environment Court's Code of Conduct for Expert Witnesses, is set out in my 26 May 2026 Advice Statement for DOC.

2. Response to comments from Friends of Belmont Park

FoBRP note that the Applicant's landscape assessment and my advice statement to DOC do not consider the proposed changes arising from future quarrying activity, should the land exchange be approved. The scope for this current phase of reporting specifically excluded the substantive proposal which will be addressed comprehensively at a later date through additional landscape effects reporting by the Applicant and DOC peer review. I acknowledge FoBRP's observation that why then are the proffered improvements to the DOC-get areas included for consideration now as these also include future changes and only if the land exchange is approved. I address this in my **Table 2** where I include a separate column with the various landscape values of each block assessed '*where the proffered improvements are successful*'. This also includes a rating where the OBDA is left unchanged but will naturally improve over time through normal ongoing weed and animal pest control as currently occurs. Otherwise, I assess the overall landscape value (without improvements / in the various blocks' current state) in a separate column in Table 2.

FoBRP question the Applicant's assessment regarding the current visibility of the DOC-Give block / OBDA. I rely on the ZTV mapping prepared by the Applicant (24 April 2026 Graphic Supplement **Figure 4**, prepared by Boffa Miskell). ZTV mapping does not account for screening vegetation, of which much would be present where

the mapped areas of theoretical visibility are shown. Figure 4's mapped theoretical visibility (across the wider area, including the Regional Park) is rated by the Applicant as 'Low-moderate' which in my opinion is fair. Most of the area appears to overlay inaccessible / unsettled / heavily vegetated areas which in addition would likely preclude any limited outward views.

If track users in Belmont Regional Park were assessed as a separate party, it may be that the visibility of the OBDA for this group would be proportionally greater, and a higher rating than Low-moderate may be concluded - the OBDA land parcel may well be 'Moderately' visible from 40% of the most well-used track in the Regional Park as FoBRP state. This seems fair on the face of things, looking at the photographs in the FoBRP comments report. The Applicant's Figure 4 shows these tracks passing through areas of theoretical visibility.

However, I have not walked all of these tracks, so cannot confirm the visible extent of the OBDA where screening vegetation is absent providing views.

In their comments report at Figure 4, FoBRP put forward an alternative reduced extent for the OBDA. While I agree that this would reduce adverse effects on landscape and natural character of the substantive changes should the land exchange be granted, I understand that revising the extent of the land parcels is beyond scope now.

3. Response to comments from Winstones

3.1. Planning memo

I have read the JW Wikaira Consulting 15 June 2026 Memorandum. Landscape matters are briefly summarised at 5.1.6. I have no comment on the planner's points and comment on any outstanding landscape matters in detail in the following section.

3.2. Technical memo – Hydrology

I have read the Landscape Dynamics Ltd 12 June 2026 Technical Memorandum which provides some additional technical information. I understand that the Panel will need to determine what test applies under the FTAA, and whether that means the values I have described are effectively discounted.

I have no comment on this report other to state that in my opinion and regardless of the application of the legal test, the natural values of the land parcels remain, irrespective of whether there is a QEII covenant over them or not.

I also note that the various metrics for the various DOC 'Get' blocks are not separated out in the hydrology memorandum. As such, my conclusions reached regarding overall landscape value of the various blocks will not alter, given the seven-point scale I've used in my own assessment.

3.3. Technical memo on Landscape by Rhys Girvan (Boffa Miskell)

Mr Girvan's findings in his original 1 December 2025 Landscape Assessment and the findings in my subsequent peer review following a site visit and later Advice Statement for DOC broadly align. As such my comments below will be brief.

Mr Girvan has helpfully included additional material in his revised 24 April 2026 Landscape Assessment ('Rev A') which includes the outlines of the various land parcels on his site photographs, additional quantifiable material relating to physical elements of each block, and a summary table. This helps describe the various land parcels and their visibility.

Mr Girvan acknowledges my Advice Statement for DOC noted that edge effects, weed and animal pest eradication and ongoing control were not addressed in great detail in his Landscape Assessment. Mr Girvan notes in his response statement that better protection against 'edge effects' can be achieved through '*strengthened conditions and clear management obligations*' which partly relies on the Applicant adopting DOCs additional conditions in the consent package should the land exchange be granted. I agree with and support Mr Girvan's recommendation but note that edge effects will prevail to a degree. The measures do not promise to eliminate edge effects.

Edge effects are also noted by Mr Girvan as relevant '*where future physical changes create new edges (and effects)*'. However, in my opinion edge effects also apply where there is no physical change too - particularly in three DOC-Get land parcels (Dry Creek, Northern Gully and Southern Gully) which are adjacent to weed and animal pest sources and have a larger edge to core ratio. In my opinion this must be reflected in their overall landscape values. Following the land exchange (if successful), these land parcels will continue to be exposed to weed and animal pest invasion which needs to be recognised with robust conditions put in place. Some threats will continuously come from neighbouring land which is outside the Applicant's control.

The Dry Creek land parcel is noted by Mr Girvan in his response statement as "...*best understood as a restoration and consolidation opportunity*". This goes beyond the description of current landscape value. Or in other words, 'restoration opportunity' shouldn't be conflated with current landscape value.

Mr Girvan discusses the relative value of the QEII covenants where he appears to opine that a separate landscape value may arise from the (legal) covenant itself as opposed to the various attributes that justify and underpin the covenant. In my opinion the two are inextricably linked. The covenant is there because the various combined attributes of the land parcel meet the standard worthy of a QEII covenant. In addition, the area will subject to a level of ongoing monitoring and management that may not occur to the same level at adjacent areas.

If the landscape values of the QEII covenanted areas are disregarded, then my overall ranking of the DOC-Get sites is **‘Moderate’**.

I am encouraged by Mr Girvan’s response and recommendation to the Applicant regarding conditions and ongoing management, to be allied with the substantive future application, where he states: *“I support the intent of DOC’s proposed conditions. If Winstone is able to strengthen its pest and weed control commitments in response to those conditions, that would further reinforce the certainty of the anticipated landscape benefits.”* And: *“I would describe the applicant’s improvement package, and more particularly the DOC conditions if adopted or reflected in amended conditions, as strengthening the long-term landscape trajectory of the DOC-Get land.”* And: *“...I remain of the view that the DOC-Get land, considered as a package and alongside the proposed improvement measures and DOC’s recommended conditions, would make a stronger and more certain long-term landscape contribution to the Conservation Estate than the DOC-Give land.”*

3.4. Winstones Improvement Package A

3.5. Winstones Improvement Package B

No landscape-related comment – these documents largely concern legal and ecological aspects including additional activities proposed in the wider Belmont Regional Park. While Package B includes additional improvements, they are not great enough to alter my conclusions on the seven-point scale regarding the relative overall landscape values for the DOC-Get and DOC-Give blocks, noting that most improvements include land outside the various land parcels, and therefore also outside my scope. I note that there is no change in the Applicant’s landscape values for the DOC-Give and DOC-Get blocks between Package A and Package B.

4. Discussion

My opinion with regards to the current conservation values of the various land parcels included in my advice statement has not altered following the various comments received. I am supportive of the Applicant’s approach in principle to adopting the various DOC conditions of consent, should the land exchange be granted.

5. Recommendation

That any additional conditions proffered by the Applicant in ‘Appendix 7 – Package B Draft conditions proposed by Winstones’ AND the additional / amended conditions recommended by DOC in their Draft Report be adopted, should the land exchange be granted.

MEMO

DATE: 01/07/2026
TO: Amy Robinson
FROM: Jacob Williams (Freshwater Technical Advisor)
SUBJECT: Freshwater assessment of Belmont Quarry proposed land swap

Overall Assessment

The values of the DOC Give and DOC Get areas are assessed in further detail in Tables 1 and 2. My overall assessment of the two areas with the limitations and information gaps discussed below are:

- **Overall freshwater ranking for DOC give site: Medium-High**
- **Overall freshwater ranking for each block in the DOC get sites:**
 - Northern Gully: Medium**
 - Firth Block: Medium-High**
 - Dry Creek: Low**
 - Southern Gully: Medium High**
- **Overall freshwater ranking for the DOC get sites: Medium-high**

Limitations/information gaps

- The eDNA surveys collected in the DOC Give block were collected at the boundary of the proposed overburden site and not at the boundary of the 'give' area. As such there may be additional species present in the habitat (about 100 m of stream length), between the sample points and the boundary of the 'give' area that may have been missed.
- The applicant states that for the DOC Give block "*Freshwater habitat and species values are limited in the intermittent sections (macroinvertebrates) and largely absent in the ephemeral sections*". However, the applicant's eDNA reports (which were mostly collected at the interface of the intermittent and ephemeral sections of the waterways), indicate good freshwater biodiversity values due to the high proportion of EPT macroinvertebrate taxa and good-excellent MCI values.
- It is not clear in the application as to the specific types of wetlands that are present. Some wetland types (e.g. ephemeral and seepage/flush) are considered threatened (Holdaway *et al*, 2012)¹ which, if present, would increase the value. **The applicant has clarified that the wetlands are not any of the threatened wetlands in Holdaway *et al* (2012).**
- I am unsure where the values and area calculations for the farm pond/wetland located between the DOC Give and DOC Get (Firth Block) are recorded. I have assumed that the feature is located in both blocks given that the water source for the pond will be predominantly from the DOC Give block.
- The waterways present on the site are likely to vary in their hydrology over time depending on weather, geology and hydrological processes. This highlights that while some of the waterways may be ephemeral/intermittent/perennial at the time of surveying, they may change throughout time which could impact the habitat and freshwater species that are present or likely to be present.

¹ Holdaway R. J., Wiser S.K., Williams P. A. 2012: Status assessment of New Zealand's naturally uncommon ecosystems. *Conservation Biology*, 26: 619–629.

Changes to the hydrological process upstream of the DOC Give and DOC Get blocks will have an impact on the waterways and wetlands located in and downstream of the blocks.

- Some of the information provided appears to be based on qualitative and assumed statements rather than surveyed information, especially in relation to **values present in** ephemeral and intermittent stream reaches. Ephemeral and intermittent waterways may have less value as habitat for fish species, however, they still provide seasonal habitat for fish species, habitat for macroinvertebrates, act as buffers for downstream reaches and can help regulate water flows.
- There is no quantitative survey information for the waterways in the Firth Block however observational information has been provided (BlueGreen, 2026 a)².
- There is no quantitative or qualitative survey information for the waterways present in the Dry Creek Block.

~~Overall ranking~~ **Ranking approach**

~~The overall ranking for the DOC get site (as a whole) is based on a combination of factors including the values assessments, area of wetlands, length of waterways, quality of waterways, fish passage barriers etc rather than a numeric values based assessment e.g. adding or averaging across the rankings.~~

For the overall ranking for the DOC get and give sites, the ranking for each criterion in each individual block considers a number of factors including the values of the wetlands and waterways, fish passage barriers downstream etc. The overall ecological value for each block is based on the highest ranking for each criterion. It is not a numeric values-based assessment e.g. adding or averaging across the rankings. The overall ranking for the DOC get sites follow the same approach of applying the highest overall ranking.

² BlueGreen a, 2026: *Belmont exchange clarifications sort by DOC*, memo.

Table 1. DOC Give Site

Criterion	Ranking	Comments
Representativeness	Medium	- Wetlands present on site (0.23 ha) (BlueGreen 2026 b)³ and downstream of the site. A farm pond and associated wetland sits between this block and the DOC Get (Firth Block)⁴. - Ephemeral/intermittent/perennial streams present (1845 m; Landscape Dynamics Ltd 2025) which are typical of the area⁵. There are primarily intermittent and ephemeral waterways in the block. - Waterways/wetlands are not modified in recent times⁶ (has historically been pasture and exotic vegetation) (BlueGreen 2026 b). Currently well vegetated riparian margins in a 'natural state'. - eDNA MCI data indicates MCI scores of 88.7-104.3 (BlueGreen 2026 c)⁷, which suggests fair-good quality (Stark & Maxted 2007)⁸. - MCI survey downstream of the site indicates scores of 120.8-124.7 (BlueGreen 2026 b)⁹ (excellent quality class). While this survey point may be outside of the DOC Give block, it is in close proximity to the block and provides an indication of macroinvertebrate communities in the permanent stream reaches.
Diversity and pattern	Medium	- Habitat types (small waterways, wetlands), ephemeral/intermittent/perennial, with a diversity of instream habitat. - eDNA results indicate no presence of native fish¹⁰. - eDNA results indicate MCI scores of 88.7-104.3 (fair-good quality class) (Stark & Maxted 2007).

³ BlueGreen. 2026 b: Belmont Quarry Land Exchange: Overview of Ecological Values. Report prepared by BlueGreen Ecology Ltd for Winstone Aggregate Ltd.

⁴ The area of this particular wetland within the two blocks is unknown.

⁵ Based on the applicant's data (Landscape Dynamics Ltd. 2025: *Belmont Quarry Hydrological analysis of proposed land exchange*) and [NIWA River Maps analysis](#)

⁶ Aerial photography in BlueGreen (2026 b) indicates that the area was previously farmland with some riparian vegetation around the waterways. Good vegetation cover was established between 1988 and 2010

⁷ BlueGreen c, 2026: *eDNA results – Belmont OBDA*, memo.

⁸ Stark, J.D., Maxted, J.R. 2007: *A user guide for the macroinvertebrate Community Index*, Prepared for the Ministry for the Environment, Cawthron Report No. 1166, 58p

⁹ This data was collected in March 2002 by Boffa Miskell Limited (Boffa Miskell Limited 2022).

¹⁰ eDNA samples in the DOC Give area were collected in four locations mostly in waterways classified as intermittent (3 sites) and perennial (1 site).

		- Records from the wider catchment indicate the presence of shortfin eel (Not Threatened), longfin eel (At Risk, Declining)¹¹ and kōura (Not Threatened)¹². These are representative of the fish diversity in the area¹³. - Predictive models indicate additional species (banded kōkopu, redfin bully) may be present (White <i>et al</i> 2022¹⁴, Crow <i>et al</i> 2014¹⁵, Leathwick <i>et al</i> 2010¹⁶)¹⁷. - The applicant's report states there are limited macroinvertebrate species and habitat values in the intermittent sections and that they are largely absent in the ephemeral sections (BlueGreen 2026 b, p. 74).¹⁸
Rarity and distinctiveness	Medium-High	- The site in LENZ mapped <10% indigenous vegetation cover left. - Wetlands are present in the site. Only Less than 3% of wetlands remain in the Greater Wellington Region (Ausseil <i>et al.</i> 2008)¹⁹. - Longfin eel (At Risk, Declining) and kōura likely present (seasonally)²⁰. - Modelled presence indicates that additional fish species, banded kōkopu, redfin bully) may be present. - eDNA results indicate no presence of native fish⁵. - eDNA results indicate the present of kōura (Not Threatened)
Ecological context (size, shape, connectivity, buffering)	Low-Medium	- Good buffering between upper catchment source water and lower catchment. - Contains source water for tributaries of Hutt River and wetlands located downstream. - Known fish passage barriers located downstream²¹. - Connectivity for fish movement is marginal given the location in the catchment and known fish barriers downstream.

¹¹ Threat classification for fish from (Dunn, N.R., Closs, G.P., Crow, C.K., David, B.O., Goodman, J.M., Griffiths, M., Hicks, A.S., Hickford, M.J.H., Jack, D.C., Kitson, J.C., Ling, N., Waters, J.M., Wylie, M.J., Hitchmough, R.A., Makan, T. 2025: Conservation status of New Zealand freshwater fishes, 2023. *New Zealand Threat Classification Series 46*. Department of Conservation, Wellington. 66 p).

¹² Threat classification for freshwater invertebrates from (Grainger, N., Harding, J., Drinan, T., Collier, K., Smith, B., Death, R., Makan, T., Rolfe, J. 2018: Conservation status of New Zealand freshwater invertebrates, 2018. *New Zealand Threat Classification Series 28*. Department of Conservation, Wellington. 25 p.)

¹³ Based on NIWA Freshwater Fish Database records

¹⁴ White, R., Stoffels, R., Whitehead, A. 2022: *State and trends of New Zealand's freshwater fishes to support the 2022 Threat Classification*, prepared for the Department of Conservation, NIWA report, 2022105CH.

¹⁵ Crow, S., Booker, D., Sykes, J., Unwin M., Shankar, U. 2014: *Predicting distributions of New Zealand freshwater fishes*, prepared for the Department of Conservation, NIWA report, CHC2014-145.

¹⁶ Leathwick, J.R., West, D., Gerbeaux, P., Kelly, D., Robertson, H., Brown, D., Chadderton, W.L., Ausseil, A-G. 2014: *Freshwater Ecosystems of New Zealand (FENZ) Geodatabase, Version One - August 2010 User Guide*, Department of Conservation.

¹⁷ An assessment was made using all three predictive models throughout this report.

¹⁸ It is unknown if this is based off any quantitative survey information.

¹⁹ Ausseil, A-GE, Gerbeaux, P, Chadderton, WL, Stephens, T, Brown, DJ, & Leathwick, J. 2008: *Wetland ecosystems of national importance for biodiversity: Criteria, methods and candidate list of nationally important inland wetlands*. Landcare Research Contract Report LC0708/158 for the Department of Conservation.

²⁰ Based on previous survey reports (Boffa Miskell 2022) and NIWA Freshwater Fish Database records.

²¹ Identified in the applicant's ecology report (BlueGreen 2026 b) and the NIWA fish passage assessment tool.

Table 2. Northern Gully²²

Criterion	Ranking	Comments
Representativeness	Medium	- Ephemeral, intermittent and permanent waterways (1191 m; Landscape Dynamics Ltd 2025) with a mix of freshwater habitat (BlueGreen 2026 b). - Waterways appear not to have been modified in recent times, but it appears some section of the waterways contain “elevated unnatural fine sediment loads adjacent to the existing fill area” (Boffa Miskell 2022 p. 7). - MCI score for some waterways in the Northern Gully (Boffa Miskell, 2022) is 122-124 (excellent quality class) (Stark & Maxted 2007).
Diversity and pattern	Medium	- Surveys for fish completed (previous reports, Boffa Miskell 2022) for the northern gully recorded the presence of longfin eel (At Risk, Declining), shortfin eel (Not Threatened) and kōura (Not Threatened)¹². - Modelled fish presence indicates additional species (banded kōkopu, redfin bully) may be present. - Previous invertebrate surveys (Boffa Miskell 2022) record an MCI score for some waterways in the Northern Gully area of 120-124 (excellent quality class) (Stark & Maxted 2007).
Rarity and distinctiveness	Medium	- The LENZ mapped indigenous vegetation cover left varies between the blocks with 10 % remaining to 20-30 % remaining. - Longfin (At Risk, Declining) eel, shortfin eel and kōura are present in some of the waterways (Boffa Miskell 2022). - Modelled presence may include additional species, kōaro, banded kōkopu, redfin bully).
Ecological context (size, shape, connectivity, buffering)	Low-Medium.	- Good buffering between upper catchment source water and lower catchment. - Contains source water for tributaries of Hutt River. - Known fish passage barriers located downstream. - Connectivity for fish movement is marginal given the location in the catchment and known fish barriers downstream.

²² As there is no survey information specifically for the QEII portion of the Northern Gully Block, I have assessed the values as the same across the non-QEII portion and the QEII portion.

Table 3. Southern Gully

Criterion	Ranking	Comments
Representativeness	Medium-High	- Ephemeral and permanent waterways (616 m; Landscape Dynamics Ltd 2025) with a mix of freshwater habitat (BlueGreen 2026 b). The main gully waterway is permanent. - Waterways appear not to have been modified in recent times. eDNA MCI score for one waterway in the Southern Gully is 109 (BlueGreen 2026 c) (good quality class) (Stark & Maxted 2007). - There is a wetland present in the Southern Gully (0.29 ha). Only Less than 3% of wetlands are left in the Greater Wellington Region (Ausseil <i>et al.</i> 2008).
Diversity and pattern	Medium	- eDNA survey for fish recorded the presence of longfin eel (At Risk, Declining), shortfin eel (Not Threatened), and banded kokopu (At-Risk, Naturally Uncommon) (BlueGreen 2026 c)²³. The applicant suggests shortjaw kōkopu (Threatened, Nationally Vulnerable) may be present.²⁴ - Modelled fish presence indicated additional species (banded kōkopu, redfin bully) may be present. - MCI score for one waterway in the Southern Gully is 109 (BlueGreen 2026 c) (good quality class) (Stark & Maxted 2007).
Rarity and distinctiveness	Medium-High	- The LENZ mapped indigenous vegetation cover left varies between the blocks with 10 % remaining. - Longfin eel, shortfin eel and banded kokopu are present in some of the waterways (BlueGreen 2026 c). - Modelled presence may include additional species, banded kōkopu, redfin bully). - Wetlands are present in the Southern Gully. Only Less than 3% of wetlands remain in the Greater Wellington Region (Ausseil <i>et al.</i> 2008).
Ecological context (size, shape, connectivity, buffering)	Low-Medium.	- Good buffering between upper catchment source water and lower catchment. - Contains source water for tributaries of Hutt River. - Known fish passage barriers located downstream. - Connectivity for fish movement is marginal given the location in the catchment and known fish barriers downstream.

²³ The samples were collected at one location in the Southern Gully.

²⁴ The applicant provides no quantitative evidence to support these statements. There are no records of shortjaw kōkopu in the NIWA Freshwater Fish Database for the Hutt River catchment (accessed March, 2026).

Table 4. Dry Creek²⁵

Criterion	Ranking	Comments
Representativeness	Low	507m of waterways (Landscape Dynamics Ltd 2025), unknown if ephemeral, intermittent or perennial. - Waterways have been modified in the Dry Creek block downstream of the proposed give site.
Diversity and pattern	Low	No eDNA or survey information for the Dry Creek block, however significant fish passage barriers downstream (piped stream) means that fish diversity is likely to be minimal but there is likely to be a good macroinvertebrate community similar to the other blocks.
Rarity and distinctiveness	Low	- The LENZ mapped indigenous vegetation cover left varies between the blocks with 10 % to 20-30 % remaining. - Modelled presence may include additional species, banded kōkopu, longfin eel and redfin bully.
Ecological context (size, shape, connectivity, buffering)	Low	- Good buffering between upper catchment source water and lower catchment. - Contains source water for tributaries of Hutt River. - Known fish passage barriers located downstream. - Connectivity for fish movement is marginal given the location in the catchment and known fish barriers downstream.

Table 5. Firth Block²⁶

Criterion	Ranking	Comments
Representativeness	Medium-High	- A farm pond and associated wetland sits between the DOC Give block and the DOC Get (Firth Block). Only Less than 3% of wetlands are left in the Greater Wellington Region (Ausseil <i>et al.</i> 2008). - Ephemeral and permanent waterways (715 m; Landscape Dynamics Ltd 2025) with a mix of freshwater habitat (BlueGreen 2026 b). Waterways appear to be predominantly ephemeral (Landscape Dynamics Ltd 2025). - Waterways appear not to have been modified in recent times.
Diversity and pattern	Low-Medium	- No eDNA or survey information for the Firth Block. - Modelled fish presence indicates longfin eel, banded kokopu and redfin bully may be present. - The applicant states that “the stream is expected to have a good MCI/QMCI score likely >110, with some strong sediment related components but absence of fish” (BlueGreen, 2026 a, p. 4)

²⁵ There is no freshwater survey information for the Dry Creek Block, this assessment is mostly based off descriptive information and site photographs but site-specific survey information would be needed to confirm the ranking.

²⁶ There is no freshwater survey information for this block, this assessment is mostly based off the descriptive information in BlueGreen 2026 a.

Rarity and distinctiveness	Medium-High	• The LENZ mapped indigenous vegetation cover left varies between the blocks with 10 % remaining to 20-30 % remaining. • Wetlands are present in the Firth block. Only Less than 3% of wetlands remain in the Greater Wellington Region (Ausseil <i>et al.</i> 2008). • Modelled fish presence indicates longfin eel, banded kokopu and redfin bully may be present.
Ecological context (size, shape, connectivity, buffering)	Low-Medium.	• Good buffering between upper catchment source water and lower catchment. • Contains source water for tributaries of Hutt River. • Known fish passage barriers located downstream. • Connectivity for fish movement is marginal given the location in the catchment and known fish barriers downstream.

Table 6. Overall values assessment for each block

	Representativeness	Diversity & pattern	Rarity & distinctiveness	Ecological context (size, shape, connectivity, buffering)	Assessment including the proffered improvements ²⁷	Overall ecological value ²⁸
DOC Give site						
OBDA	Medium	Medium	Medium - High	Low - Medium	N/A	Medium - High
DOC Get sites						
Northern Gully	Medium	Medium	Medium	Low – Medium	N/A	Medium
Firth Block (QEII)	Medium-High	Low-Medium	Medium-High	Low – Medium	N/A	Medium-High
Dry Creek	Low	Low	Low	Low	N/A	Low
Southern Gully	Medium-High	Medium	Medium-High	Low – Medium	N/A	Medium - High

²⁷ These are the improvements offered by the applicant.

²⁸ I have assessed the overall ecological value based on the highest ranking for each criterion.

Freshwater response to comments

DATE: 29/06/2026
TO: Carolyn Wratt (Fast-Track Advisor)
CC: Amy Robinson (Fast-Track Advisor)
FROM: Jacob Williams (Senior Technical Advisor, Freshwater)
SUBJECT: Freshwater response to comments

Freshwater response

The assessment I completed was based on desktop information and the information supplied by the applicant. A site visit was not deemed necessary due to the likely values that are present on the site.

The DOC approach for assessing the Freshwater values is based on our guidance document which has been provided to the applicant. This guidance document does not require an assessment to be completed based on total length, area, volume etc of the values of the sites. This approach focuses on the values present (or likely to be present), particularly highlighting rare or threatened species or ecosystems where present. The value may be high even though the quantity is low. I have reworded the description of the approach in my report to clarify.

The DOC freshwater assessment includes all freshwater values including both wetlands and waterways. I considered the freshwater components of the wetland values e.g. hydrology, habitat for fish and invertebrates, water quality and buffering.

The DOC freshwater assessment method also provides an overall score for 'freshwater value' by using the maximum score for any single criterion. This is to make sure we are not underestimating values based on uncertainty and assumes a precautionary position. In the cases of the blocks that are given a medium-high rating, this is primarily due to the presence of wetlands which are a rare ecosystem in the Wellington Region. The assessment aims to give an indication of the overall freshwater values in each block using the information available, not provide a weighting scale to assess the blocks against each other.

The freshwater assessment outlines the high-level values across all the blocks (give and get). Overall, while the values are assessed as medium-high for the give and get, I do not have any significant concerns about the loss and gain of freshwater values due to the potential land swap taking place.

For clarity, I confirm that the presence (or not) of the QEII block does not change my view of the values present as the values remain the same regardless of any covenant over the land. Likewise, the conditions proposed by the applicant in both package A and B do not change my view, as they do not include any major freshwater components.

Before the Fast-track Panel

Under: Fast-track Approvals Act 2024

In the matter of: FTAA-2603-L003 – Belmont Quarry Development – Land Exchange

Statement of advice: Michael Harbrow

Recreation

DOC staff

21 April 2026



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Introduction

1. My full name is Michael Andrew Harbrow.

Instruction

1. I have been requested to provide expert advice on behalf of the Director-General of Conservation for her section 35 land exchange report required to be prepared under the Fast-Track Approvals Act 2024, for the Belmont Quarry project land exchange application.

Qualification and Experience

2. I am a Senior Visitor Advisor for the Department of Conservation working from Whare Kaupapa Atawhai / Conservation House in Wellington. I have a Bachelor of Science in Plant and Microbial Sciences from the University of Canterbury (1998), a Master of Science in Zoology from the University of Canterbury (2001) and a Post Graduate Certificate in Resource Studies with Distinction from Lincoln University (2009). I have seventeen years' experience providing recreation and tourism advice for DOC including ten years' experience as a Visitor Advisor and seven years' experience as a Social Science Advisor.
3. My role in this project to date has included review of both draft and substantive application documents, including the applicant's Recreation Assessment and other supporting information.

Code of conduct

4. Whilst it is acknowledged this is not an Environment Court Proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this advice is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of advice and expert opinion

5. My expert advice relates to the following:
 - i. Adequacy of the Applicant's assessment of the recreation values of the land that is proposed for exchange, including identification of any values that have not been assessed or have been insufficiently characterised.
 - ii. The extent to which the proposed land exchange would enhance or diminish the values of the conservation estate, where this pertains to recreational values.
 - iii. The extent of any health and safety obligations and costs that DOC might incur in relation to recreational visitors, as a result of the proposed land exchange.
 - iv. Matters raised by submitters in relation to the recreation values of the land that is proposed to be exchanged.
6. The effects of any future development arising from a further substantive application are not considered in this advice as they are outside the scope of the land exchange application.

Material Considered

7. In preparing this advice I have reviewed the following documents as part of the land exchange application:
 - a. Recreation Assessment and Recreation Values Report
 - b. Land Exchange Report
 - c. Health and Safety Report
 - d. Geotechnical Report
 - e. Land Contamination Reports
 - f. Flood and Climate Change Risk Assessment
 - g. Landscape Assessment

8. I have undertaken site visits on 3 April and 10 April 2026.

Summary of proposal

9. Winstone Aggregates are seeking a land exchange under section 33 and Schedule 6 of the Fast-track Approvals Act 2024 (FTAA). The proposed exchange would add approximately 34 ha of land owned by parent company Fletcher Concrete and Infrastructure Limited to the conservation estate. Approximately 24 ha of conservation land within the Dry Creek Recreation Reserve, managed as part of Belmont Regional Park, would be transferred to Winstone Aggregates.
10. The land exchange application forms part of the broader Belmont Quarry Development Project, which is listed under Schedule 2 of the FTAA. Following a successful application for land exchange, this project would be advanced through a further substantive application under the FTAA. This would include development of an overburden disposal area (OBDA) on the land gained from Belmont Regional Park which would enable the applicant to extend the life of the adjacent quarry.
11. The applicant is proposing to transfer four parcels of land owned by Fletcher Concrete and Infrastructure Limited, referred to as the “DOC-Get” land, to the conservation estate. These land parcels, comprising the Northern Gully (12.62 ha), Southern Gully (3.94 ha), Firth (9.6ha) and Dry Creek (7.94 ha) blocks, total approximately 34 ha and are adjacent to Belmont Regional Park (Figure 1). They include a mix of forest, scrub, and wetland environments and also some areas previously used for overburden disposal, clean fill or quarrying.
12. In exchange, a single block of approximately 24 ha of conservation land comprising regenerating native forest and areas of mixed grass, scrub and conifers, would be transferred to the applicant. This land is part of the Dry Creek Recreation Reserve owned by DOC and is currently managed by Greater Wellington Regional Council (GW) as part of Belmont Regional Park. It is referred to as the “DOC-Give” land or proposed OBDA.

15. The same survey indicates that walking and tramping is by far the most popular activity in the Park (72% of respondents who visited Belmont Regional Park). Other activities included leisure/sights/scenery (31%), exercising dog (18%), mountain biking / cycling (16%), social recreation with family (14%), visiting a dam (11%) and running (10%).
16. The Dry Creek entrance to the Park is located 9 km from the Lower Hutt CBD, and 10 km from Upper Hutt. It is accessed from Hebden Crescent a short distance off State Highway 2 and is also close to public transport, being a 15 minute walk from Manor Park Station.
17. Several recreation experiences used by walkers, mountain bikers, horse riders and campers are accessed from the Dry Creek entrance including:
 - a. Vehicle accessible camping at Dry Creek Camping Area
 - b. Dry Creek Waterfall Track – a 2.2 km return walk that follows Dry Creek through native bush up to a small waterfall.
 - c. Dry Creek Loop Track – an 8 km walking and grade 3 mountain bike track that loops around the Dry Creek catchment on 4WD tracks.
 - d. The Buchanan Road Tramping Track – an 8 km return walking and grade 3 mountain bike track on gravel road and 4WD tracks. The track gives access to Boulder Hill and connects with the Puke Ariki Traverse, a 22 km trail crossing Belmont Regional Park from north to south.
18. The Dry Creek Loop Track and Buchanan Road Tramping Track are the only managed tracks that are affected in any way by the land exchange proposal. The applicant's Recreation Assessment provides an estimate of usage for the Buchanan Road Tramping Track, however I consider the basis for this figure to be questionable (see "Areas of disagreement with the applicant's recreation assessment", below). No information is available on use of the Dry Creek Loop Track.
19. Estimated usage of the Dry Creek entrance in 2024 was 29,400 according to figures sourced from GW and provided in the applicant's Recreation Assessment.

By comparison, use of the more popular Hill Road (361,500) and Cornish Street (414,100) entrances to the Park were significantly higher.

Recreation value of the DOC-Give land

20. The DOC-Give land can be accessed via the Buchanan Road Tramping Track. This track climbs up a gravel 4WD road for 1.7 km before splitting into two sections. The northern section continues on a formed track and is marked as the route onward to Boulder Hill, the Puke Ariki Traverse and Dry Creek Loop Track. The southern section continues on as a formed pylon access road, crossing the DOC-Give land, before rejoining the northern section of the track. This southern section is referred to as the Utility Track in the applicant's Recreation Assessment and in this report.
21. The Utility Track has some recreational value as it provides access to opportunities in the DOC-Give land (discussed further below). However, for other park users the track provides a longer detour with no particular points of interest or difference in scenery, and is likely to be used inadvertently by visitors who miss the marked deviation off the gravel road.
22. The area around the Utility Track is also traversed by unformed legal road, but the Utility Track is generally poorly aligned with it. The alignment of the Tramping Track, Utility Track and Legal Road are shown in Figure 2, below. The applicant has advised that development of the OBDA will require stopping of the unformed legal road. The road stopping is not part of the land exchange application so is not considered further in this report.

Figure 2: Buchanan Road Tramping Track, Utility Track and Legal Road (Source: Recreation Assessment, Rob Greenaway & Associates)



23. From the Utility Track, a 4WD track provides flat, easy access further into the DOC-Give land to an area of grassy clearings and scrub among pine and macrocarpa trees. This was previously the site of a farmhouse and associated shelter belts and some remnants of a farm building and fencing can still be seen.
24. Several predator control lines and informal trails extend from this area down through bush that has regenerated in the decades since the area ceased to be farmed. These routes are marked with permatat or flagging tape. I observed these trails to be well used and maintained, with clear ground trails. They allowed for easy travel throughout the block, including to areas of botanical interest and to a small pond on the boundary with the Firth Block. There were very few traps observed on these trails, but regardless of their purpose or predominant use, the extent of the trail network, the ease of access and the length of time they would allow visitors to spend immersed in the bush environment provides a good opportunity for those interested in exploring the area.
25. While the area can be accessed with relative ease and is clearly used and valued by, what is likely to be, a small number of regular users, there is no reliable means of assessing the overall level of use. I do not consider information from Strava to be a useful means of assessing off-track use in this regard (see “Areas of disagreement with the applicant’s recreation assessment”, below).

26. I do not consider the experience within the DOC-Give area to be exceptional as there are numerous opportunities to explore areas off track in a bush setting in the Hutt Valley and in the wider region, both within GW's regional parks network and on land managed by the Department of Conservation. The area also does not provide connectivity to other locations of interest and does not contain significant points of interest that would appeal beyond a niche audience.

Recreation value of the DOC-Get land

27. Other than an existing 33m right of way where the Dry Creek Loop Track crosses the Dry Creek Block, there is currently no public access to the DOC-Get land and no existing recreational use.
28. Should the land transfer go ahead, access to and within the DOC-Get land would be poor. The land is fragmented, the blocks lack existing tracks and are generally not well connected to conservation land within Belmont Regional Park. This contrasts with the relative ease of access to the DOC-Give land.
29. Access is possible from the Buchanan Road Tramping Track to near the boundary of the Northern Gully Block via an existing pylon access route, but there are no tracks that would facilitate further access into the block. Furthermore, the slopes leading down into the block are steep and heavily vegetated which is likely to limit practical access.
30. The area of the Northern Gully Block immediately adjacent to Belmont Regional Park features more mature Tawa – Kamahi forest that could be attractive to visitors. This area is protected by the smaller of two QEII covenants on the DOC-Get land (2.87 ha). However, other parts of the Northern Gully Block have previously been used for disposal of overburden and subsequently restored and replanted. The block also has a long boundary with Belmont Quarry on its southern and eastern edge and visitors could experience noise and other impacts from the quarry and therefore a significantly less natural setting and reduced quality of experience.
31. The entirety of the Firth Block (9.61 ha) is also covered by an existing QEII Covenant. Transferring this land would allow the public to access the protected

forest, but the Firth Block is steep and distant from existing tracks. It also adjoins the quarry land on two sides, while another side borders the busy State Highway 2. Parts of the Firth Block have been modified by historic quarrying.

32. Public access into the Southern Gully Block would only be available from Belmont Regional Park via the Northern Gully Block. A proposed access to the Southern Gully Block off Liverton Road would be for conservation and maintenance purposes only, with public access expressly excluded. Parts of the block have also been used for overburden disposal in the past and the block is a thin strip bounded by the quarry on one side and lifestyle blocks on the other.
33. The Dry Creek Block is located close to the Dry Creek entrance to Belmont Regional Park, however, a steep, bush-clad ridge separates it from the park (including the campsite and Loop Track), and would limit access. There is potential for access into the top of the block from an old trail near a power pylon on the Dry Creek Loop Track. This trail is visible in historic photographs and still evident on the ground, although currently blocked by beehives. Accessing this location would require either a steep climb from the upper Dry Creek Campsite or a long walk around the Loop Track, which would likely limit interest in visiting this area. The location next to a former quarry and the Holcim Cement Plant is also likely to limit interest from visitors. Parts of the Dry Creek Block have been modified by previous disposal of clean fill.
34. As the right of way for the Dry Creek Loop Track exists currently, transferring ownership of the underlying land to DOC does not add to the recreational values of conservation land in the area. There is no practical access into the wider block from that section of the track due to vegetation and steep terrain.
35. Overall I consider the current recreational value of the DOC-Get land to be low.

Future development of the DOC-Give and DOC-Get land

36. It is appropriate to consider the likelihood of future development of both the DOC-Give and DOC-Get land when assessing its recreational value. The Wellington

Conservation Management Strategy (CMS) 2019³ provides direction for the management of recreation on public conservation lands and waters within the Wellington Region. The DOC-Give land falls within the Wellington-Kapiti Place within the CMS, as would the DOC-Get land if it were transferred to the Department.

37. The CMS does not provide specific direction on the management or development of recreation experiences on the DOC-Give land as the land parcel is relatively small and is managed by GW. Policy 10.3.4.2 of the CMS provides general direction within the Wellington-Kapiti Place that *“when planning for and providing recreation opportunities, both on and off public conservation lands and waters, encourage the participation of PSGEs [Post Settlement Governance Entities], tangata whenua, other conservation partners and user groups when working with local authorities to create a coordinated network of recreation opportunities.”*
38. GW’s Toitū Te Whenua Parks Network Plan 2020-2030⁴ provides direction for Belmont Regional Park. Some future improvements are specified for the Dry Creek entrance, and for tracks in the park generally, but the plan does not identify the DOC-Give land as a priority for development or improvement of recreation opportunities. It also does not identify the land as a priority for restoration of the environment that might enhance the recreational experience in the area.
39. It is unlikely that DOC would develop facilities or access on the DOC-Get land under current settings. The Department’s current priority is to renew existing assets with a focus on the most popular places and showcase experiences within the conservation estate. Development of recreational opportunities by other parties is possible, but would be subject to funding and permission being granted under relevant legislation. I am unaware of any specific proposals for development of the DOC-Get land.

³ Department of Conservation (2019). Wellington Conservation Management Strategy.
<https://www.doc.govt.nz/about-us/our-policies-and-plans/statutory-plans/statutory-plan-publications/conservation-management-strategies/wellington/>

⁴ Greater Wellington (2020). Toitū Te Whenua Parks Network Plan 2020-30.
<https://www.gw.govt.nz/assets/Documents/2022/05/Parks-Network-Plan-2020-30-3.0.pdf>

Health and safety of visitors

40. The recreation value of the DOC-Get land could be reduced if DOC incurred significant costs or obligations to manage the safety of visitors. In this section I discuss the hazards to the public identified in the application and the requirements for management under DOC's Visitor Safety Management Policy.⁵
41. The applicant's Health and Safety Report considers potential obligations as a Person Conducting a Business or Undertaking (PCBU) under the Health and Safety at Work Act 2015. It advises that *"under the land exchange, no additional health and safety risks to Firth Block, Dry Creek, Northern Gully and Southern Gully have been identified other than those arising from the quarry interface. The new quarry boundary extends into the Belmont Regional Park to the Buchanan Track. This will create a new interface between the public (walkers, park users) and quarry operations. Although this is a new interface, no additional risks have been identified beyond those that already exist and are managed by existing site controls. To manage this interface, a combination of fencing, signage, and physical buffers will be implemented."*
42. A proposed draft pre-condition for the land exchange outlined in the Land exchange report, would require the applicant to install 60 m of fencing set back from the Firth Block pit face to address the risk of visitors entering the active quarry in this area. The measures that would be employed in other areas (e.g. Dry Creek Block, proposed OBDA) are not specified beyond the general approach outlined above.
43. Geotechnical reports provided by the applicant discuss two further potential hazards to visitors on the DOC-Get land.
 - a. An area is identified within the Firth Block that has previously been quarried and which is now revegetated with hazards arising from terrain and potential slope instability. The assessment indicates that, while there is localised slope instability, the area is heavily vegetated and largely

⁵ Department of Conservation, Visitor Safety Management Policy. Approved 11 May 2025.

inaccessible and would not be expected to present a significant risk to persons.

- b. There is a former quarry access road within the Dry Creek Block that may include road cuttings < 5m. The assessment concludes that the area is largely inaccessible due to heavy vegetation and that the risk to the public from slopes or cuttings above the road is similar or less than what exists for access roads that are already present within Belmont Regional Park.
- 44. The applicant has also provided natural hazards and contaminated sites reports covering the DOC-Get land and no hazards of this nature have been identified.
- 45. Based on the information provided by the applicant, the proposed land exchange would not be expected to impose significant visitor safety obligations and costs on DOC. This is principally because under DOC's Visitor Safety Policy, the Department will only undertake management of visitor safety within managed visitor sites. These are defined as locations on public conservation lands and waters where:
 - a. Non-commercial visitor infrastructure is provided by DOC or an authorised third party, or:
 - b. Non-commercial visitor infrastructure is provided by DOC or an authorised third party to access it, and/or it is part of the visitor experience being offered. Even if the location that is accessed has no visitor infrastructure or is not on public conservation lands and waters.
- 46. There are no managed facilities on the DOC-Get land, other than the existing Dry Creek Loop Track managed by GW. It is also unlikely that DOC would seek to develop facilities on the land in the future. The DOC-Get land would not be considered a "visitor site" and any visitors venturing off-track on the DOC-Get land would be expected to take full responsibility for their own safety.
- 47. The Buchanan Road Tramping Track is directly adjacent to the proposed OBDA, however, effects arising from this activity are not relevant to the land transfer application and are best considered as part of a future substantive application. The track is also managed by GW as part of Belmont Regional Park and DOC does not manage visitor safety at this location or undertake day-to-day management.

Areas of disagreement with the applicant's Recreation Assessment

48. I consider the information provided by the applicant on the recreation values of the DOC-Get land and the wider recreation context of Belmont Regional Park to be an accurate representation, however I disagree with some aspects of the assessment relating to the existing use and value of the DOC-Give land.
49. The Recreation Assessment and Recreation Values Review provide an annual estimate of use for the Buchanan Road Tramping Track of 6570, equivalent to 18.3 uses per day. The annual usage figure is calculated using data from a visitor counter that was installed on the track between 9 July and 9 September 2025 and reference to Strava data. It was derived by calculating the ratio of Strava counts for the track for August 2025 to usage recorded on the visitor counter over the same period. This figure (4.9) was then applied as a multiplier to 12 months of visitor counter data.
50. I consider that this approach would only be valid if Strava users and non-Strava users had similar patterns of recreation use and if the true ratio did not differ seasonally (i.e. the ratio calculated in August was similar throughout the year). This is unlikely to be the case as outdoor recreation tends to be seasonal, peaking over summer when there is better weather and more daylight. Strava-use is also skewed towards active sports such as cycling and running along with those tracking performance and progress towards fitness goals. Visitors with other motivations for visiting e.g. walking the dog, spending time with friends and families, appreciating nature and landscapes, relaxation etc would be less likely to use Strava to track their visits.
51. I also disagree with the assessment in the Recreation Values Review that use of the DOC-Give land is insignificant. This statement was based on the author not observing others using the area during their site visits and observing no activity on Strava. I consider that individuals accessing the DOC-Give land for exploration or botanising are unlikely to record visits in Strava. Observations of use during site visits made in winter and early spring are also very unlikely to be representative of activity through the year, particularly the summer months.

52. The Recreation Assessment concludes that the proposed land exchange is one of low value DOC-Get for low value DOC-Give land, and that there is no measurable gain or loss at the Regional Park scale. I disagree with this assessment. I consider that while the recreation value of the DOC-Get land is low, the value of the DOC-Give is higher and therefore the proposed exchange would reduce the recreation value of conservation land. Key factors in my assessment are:
- a. The ease of recreational access both to and within the DOC-Give land compared to the DOC-Get land.
 - b. The extent to which the DOC-Get land has been subject to human modification compared to the DOC-Give.
 - c. The contiguous nature of the DOC-Give land and length of experience that is possible within it, compared to the fragmented nature of the DOC-Get land and the smaller size of the individual blocks.

Matters raised in submissions

53. This report discusses several issues relating to recreational values that have been raised in submissions. These include
- a. The relative lack of public access to the DOC-Get land and the challenges of enabling access (raised by the New Zealand Conservation Authority and Friends of Belmont Regional Park - FoBRP)
 - b. The accuracy of the applicant's assessment of the recreational value and use of the DOC-Get land (FoBRP)
 - c. The use of Stava to assess the level of off-track tramping and exploration (FoBRP)
 - d. The suitability of the DOC-Get land for creating additional recreation opportunities (FoBRP)
54. The New Zealand Conservation Authority and FoBRP have also raised concerns that the proposed OBDA would be visible from other tracks in the Park, including almost half of the Buchanan Road Tramping Track. As this matter relates to the

future development of the land, rather than the land transfer application, it is not appropriate to comment on this issue in this report.

55. The FoBRP submission outlines a number of community aspirations for the DOC-Get land. These include creation of a circular walkway taking regenerating ridges, the pond, wetland and taonga species, and installation of interpretation regarding the farm site and swamp maire. These are noted in my assessment but are considered speculative in the absence of funding and appropriate management agreements.

Overall assessment

56. My overall assessment of the DOG-Give and DOC-Get areas based on the available information is:
- a. Overall recreation ranking for DOC-Give site: **Low-Medium**
 - b. Overall recreation ranking for DOC-Get sites: **Low**
 - c. Overall recreation assessment for DOC-Get sites (not including QEII covenants): **Low**
57. The values of the DOC-Give and DOC-Get areas are assessed in further detail in Table1, below. The comparative values of each individual block are summarised in Table 2, with a separate assessment provided for areas of the Northern Gully Block with and without the QEII covenant.

Comparative reporting of criteria assessment

Table 1: Recreation values of DOC-Give vs DOC-Get land

Criteria	DOC-Give	DOC-Get
Alignment with strategic objectives/visitor network strategy	Low – DOC’s Wellington Conservation Management Strategy (2019) does not provide specific direction for management of recreation on the DOC-Give land. However, the Department is not seeking to offer visitor experiences in this area as the land is managed by Greater Wellington Regional Council as part of Belmont Regional Park. The DOC-Give land is not identified as an area for development within Greater Wellington’s Toitū Te Whenua Parks Network Plan.	Low – It is unlikely that the Department would seek to offer or develop additional visitor experiences in this area. The DOC-Get land is adjacent to Belmont Regional Park, where recreation opportunities are already provided by Greater Wellington Regional Council. The land is fragmented, difficult to access and would not complement or add anything to existing opportunities in the area. The Department’s current priorities for investment in recreation are on improving experiences aligned to the Future Visitor Network (FVN) and intentions for the Visitor Portfolio (currently under development). A key priority is investing in the most popular places and showcase experiences within the conservation estate and renewal of existing assets, rather than development of new ones.
Social license – for PCL, social license for exchanging away the land, and for the land offered, social license for acquiring the land	Low – there is some community opposition to the land exchange represented by the submission from FoBRP. In relation to recreation values, the submission emphasises the existing use of informal trails and predator control lines and community aspirations for development of tracks along with interpretation relating to the farm site and swamp maire. Loss of these current and future recreation	Low – except for the Firth Block, I am unaware of any public demand for the DOC-Get land to be brought into the conservation estate for public access or the development of recreation opportunities. The FoBRP submission states that it would be good to enable more public access to the Firth Block, but notes that this impractical due to the steepness of the terrain.

	opportunities is expected to result in lower social license for the land exchange.	
Rarity of experience within the region	Low - there are many opportunities to access similar experiences in the wider region.	Low – there are many opportunities to access similar experiences in the wider region.
Use level (for PCL)/anticipated use level (for land offered)	Low – Although there is no reliable estimate of overall use of the Buchanan Road Tramping Track, the Utility Track is used by a significant proportion of visitors who (probably inadvertently) follow the gravel road rather than the marked trail when walking to or from Boulder Hill or walking the Dry Creek Loop Track. The use of the Utility Track is not representative of the wider use of the DOC-Give land, which is likely limited to a small number of visitors engaging in exploration and botanising.	Low – there is existing use on a short section of the Loop Track within the Dry Creek Block, but this is over an existing Right of Way and is unaffected by the land exchange. Vegetation, steep terrain and a lack of access to and within the DOC-Get land is likely to significantly limit future use. Parts of the DOC-Get land have also been modified by previous overburden disposal, clean fill or quarrying and / or could be impacted by activities within the adjacent Belmont Quarry and Holcim Cement Plant. There to be limited interest in visiting these areas when there are more natural / easily accessible opportunities in the area.
Level of access (e.g. tracks)	Medium – Access into the DOC-Give land is straight forward requiring a 1.7 km walk from the Dry Creek carpark along the gravel road formation of the Buchanan Road Tramping Track. From there access into the block is obtained via the utility track and a flat section of 4WD track. Predator control lines and informal trails marked and maintained through the bush allow relatively easy navigation throughout the block, including to the pond and sites of botanical interest.	Low – Public access to and within the Firth Block would be difficult as a result of vegetation, terrain and a lack of tracks. Access is possible to near the edge of the Northern Gully Block via the Buchanan Road Tramping Track and a pylon access route, but onward access through the block would be similarly difficult. The Dry Creek Block includes 33m of the existing Dry Creek Loop Track where access is already enabled by a Right of Way over the land. This access would not materially change as a result of the land exchange. Access into a different part of the Dry Creek

		Block would be possible from another section of the Loop Track, near a power pylon where an old trail is discernible through gorse and scrub. However, access up to this point from the Dry Creek carpark and upper campsite is very steep.
Natural hazard/climate risk	Low – no known natural hazard or climate risk relevant to recreation values.	Low – no known natural hazard or climate risk relevant to recreation values.
How do any heritage or biodiversity values affect the visitor experience (for land offered, how might heritage or biodiversity values affect the visitor experience?)	Low - medium – the site of an old farmhouse including remains of a farm building, fencing and shelter belt are easily accessible from the Buchanan Road Tramping Track via the Utility Track and 4WD track and provides a point of interest for visitors. Away from this immediate area, the land drops away into regenerated bush and the experience is of a substantially natural setting.	Low – there are no known heritage values that would be of interest to visitors. There are two areas protected by QEII covenants that may offer a more natural experience than the other areas of the DOC-Get land. However, there is nothing to indicate that these blocks have significance either regionally or in the context of the natural values already present within the Dry Creek area and the presence of the covenants has only minor impact on the overall assessment of recreation values. In contrast, all of the blocks have areas that have been modified by overburden disposal, clean fill or quarrying. Other areas are adjacent to the active quarry and Holcim Concrete Plant. This is likely to have a greater impact on the recreation experience in the DOC-Get land as it significantly reduces the opportunity for immersion in a natural setting.

Table 2: Assessment of recreational values of individual land parcels

[illegible]

Northern Gully (non- QEII)	Low	Low	Low	Low	Low	Low	Low	Low
Southern Gully	Low	Low	Low	Low	Low	Low	Low	Low

Response to comments on draft Belmont Quarry land exchange report

Author:	Michael Harbrow
Discipline:	Recreation
Date:	28 June 2026

1. Introduction

I reviewed the Applicant's December 2025 Recreation Assessment prepared by Rob Greenaway of Rob Greenaway & Associates, along with other relevant information provided by the Applicant. I also undertook site visits to the area on 3 and 10 April 2026.

I prepared a Statement of Advice for the Department of Conservation (DOC) dated 21 April 2026 and have read Mr Greenaway's response to that document. I have also read the Friends of Belmont Regional Park's (FoBRP) comments and the Applicant's planner's comments on DOC's draft report concerning the land exchange. I respond to several matters raised in these comments below.

My qualifications and expertise, and agreement to comply with the Environment Court's Code of Conduct for Expert Witnesses, is set out in my 21 April 2026 Statement of Advice for DOC.

2. Response to comments from Friends of Belmont Regional Park

FoBRP have provided six comments relating to the assessment of recreational values in the comments on the draft Land Exchange Report, dated 14 June 2026. I respond to each of these below.

1. *"...the proposal to plant swamp maire in the Southern Gully parcel ignores the recreation values of the park. Whether 200 or 1800 specimens are planted, it would be a considerable loss from a recreation perspective, since none of them will be accessible to park users. Even if the re-planting would be successful; the swamp maire wouldn't even be visible at a distance."* (p5).

I agree that the planting of swamp maire in the Southern Gully with the difficult access as originally proposed would not address the loss of recreation value for those who value its presence in the more accessible DOC-Give land. The Applicant has now offered further improvement packages in response to the draft Land Exchange Report and is proposing that public access would be provided to

the Southern Gully from Liverton Road. This proposal would improve the accessibility of the restoration plantings, however, the Southern Gully will offer a lower quality recreation experience given it is a narrow corridor between the quarry land and lifestyle blocks, that has had a degree of human modification. The proposed access off Liverton Road is discussed further under Improvement Package A, below.

2. *"The draft report states that there is "no net gain for biodiversity - flora and recreation" but FoBRP believes this understates the case : there would in fact be a significant net loss in recreation value, mainly from the loss of the special upland wetland habitat that is unique to the park, and indeed the Wellington region. FoBRP recommends that the DoC final report make clear that there would be a net loss of recreation values, not just "no net gain". (p5).*

The contribution of heritage and biodiversity values to the visitor experience is already considered as a criterion in the assessment of recreation values for the DOC-Give and DOC-Get land. There are many opportunities to explore areas off track in a bush setting in the Hutt Valley and in the wider region and in that sense, the experience offered in the DOC-Get land is not exceptional. Instead, the area is particularly valued by a small group of knowledgeable visitors who are aware of the significance of the wetland habitat and species present.

3. *"Page 27 of the draft report states that "If the land exchange goes ahead, public access to these blocks will be enabled resulting in a future recreation value of Low." Bearing in mind that there is no expectation that the DoC-get areas would be incorporated into the Park, and that physical access to much of the land would not be possible, we contend that the future recreation value of those lands would be nil. There can also be no public access from Liverton Road." (p5).*
4. *"FoBRP recommends that p27 of the final report be amended to make clear the nil recreation value of the DoC-get areas. Even if these lands were to be incorporated into the Park, quarrying activities and extremely steep terrain would make physical access impossible for much of the DoC-get areas." (p5)*

The assessment of overall recreation value is based on a number of criteria, outlined in my previous Statement of Advice. Level of access is only one of these. All criteria were rated on a scale from low to high and contributed to an overall rating for the DOC-Give and DOC-Get lands. The difficulty of access to the DOC-Get land is acknowledged, but given access would be difficult, but not physically impossible, I do not consider that a nil value would be appropriate. I also note that

access to the DOC-Get land would now be improved to some degree with the addition of public access from Liverton Road.

The impact of the adjacent quarry, previous quarrying and overburden disposal in some of the DOC-Get land, and the steep terrain are also considered in the assessment, particularly in terms of their potential effects on future use-levels for the DOC-Get land.

5. *“The recreation section considers only physical on-site matters but does not consider the landscape as viewed by recreators. As with the landscape assessment, the recreation assessment ignores the effect on track users beyond the boundaries of the DoC-give and DoC-get areas (p5).”*

This concern was raised in previous comments on the application from FoBRP and is addressed in point 54 of my previous Statement of Advice (p15). As it relates to the effects of future development of the land, rather than effects arising from a change of ownership, it is not appropriate to comment on this issue in assessing the land exchange application.

6. *“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.” The FoBRP recommends that the above suggestion be made a condition of the application to ensure that the most valued and important parts of the DoC-Give area would then be excluded from the proposed land exchange. That part would thus remain under DoC ownership, continue to be part of the Park, preserve public access and preserve the most significant conservation values of the lands in question. (p8,9).*

I agree that this suggestion would retain some of the recreational value of the DOC-Give land. However, it would represent a different land exchange proposal to the one being assessed and is outside the scope of my advice.

3. Response to comments from Winstone Aggregates

Comments relating to the assessment of recreational values in the draft Land Exchange Report, have been provided by the Applicant in a planning memo and technical memo on recreation. I respond to the two proposed improvement packages, separately following my response to these comments.

3.1 Planning memo

Two issues were raised in the planning memo, “*Belmont Land Exchange Application – Response to draft DOC report*”, dated 15 June 2026 prepared by Jade Wikaira, Wikaira Consulting Limited.

1. *“Recreation (Appendix 4E) relies on informal pest-control lines as recreation value. Those lines do not meet the track construction standard DOC itself provided to Winstone at the pre-application stage, and cannot fairly be treated as recreation assets.” (p6).*

The track construction standards that are used by DOC and other organisations, guide the construction and maintenance of tracks, where they have chosen to provide managed facilities for use by recreational visitors. Standards are used to ensure that safety and quality of experience are managed at a level appropriate to the predominant visitor group.

Facilities, such as tracks, are only one component of a recreation experience, and are not a prerequisite for a location to have recreational value. The public has a right of access to public conservation land, with or without tracks.

Many activities take place in the absence of formal tracks, and some visitors intentionally seek out experiences where there are no or only limited facilities provided. This may be to experience a less modified environment, a more physically challenging experience, fewer people, or to visit locations of interest to them, including those with biodiversity or heritage value.

The presence of informal tracks and the use and maintenance of pest control lines for access reflect the recreational value that some members of the community have placed on the DOC-Get land. In my view, an assessment that only considered the use of managed facilities would be unduly narrow.

2. *“..the rec report imports 'social licence' as an assessment criterion and rates it Low. That finding rests almost entirely on a single opposing comment, from the Friends of Belmont Regional Park. Social licence was not raised with Winstone at any point during the approximately six-month pre-application process. Assessing it properly would require evidence, which DOC has not commissioned. A social licence conclusion drawn from one comment, introduced late and without that analysis, is not soundly based. The exchange*

is not appropriately (or correctly) assessment on the balance of support and opposition; which to do so would ignore the statutory tests.” (p6).

Technical assessments were undertaken in accordance with the Department’s “*Internal guidance for conservation values assessments for land exchanges under the Fast-track Approvals Act.*” Social license for exchanging away the DOC-Give land and acquiring the DOC-Get land was considered in the context of the recreation opportunities accorded by each. However, it was not a conclusive factor in the overall assessment.

I note that there was no evidence of any community interest in greater recreational access to the DOC-Get land and some opposition to the loss of the DOC-Give, but overall, there were few comments from invited submitters that related specifically to recreation values.

3.2 Technical memo on recreation by Rob Greenaway

A further memo dated 15 June 2026 has been provided by Rob Greenaway responding to points made in the draft Land Exchange Report and my Statement of Advice. These relate to recreation values and the recreation opportunities of the proposed land exchange.

Mr Greenaway acknowledges my concerns with the annual estimate of 6,570 uses of the Buchanan Road Tramping Track which were derived from a short-term visitor counter and Strava data. He notes his overall recreation assessment was cross-checked against other data sources and that these data sources are consistent in indicating that Buchanan Road and the adjacent DOC-Give land are relatively lightly used compared with the main park entrances and track corridors (points 8 & 9, p2). I agree with this assessment.

I also agree with Mr Greenaway that off-track exploration, including use of predator-control lines, is inherently difficult to quantify and typically associated with low-intensity specialised use, and that its presence can add diversity and interest for a small group of experienced users (point 11, p3).

I discuss the values of the DOC-Give land within the wider recreational setting of Belmont Regional Park. I also note the lower level of use of the Dry Creek entrance, compared to the significantly more popular park entrances at Hill Road and Cornish Street. However, for the purposes of assessing the land exchange, a comparative assessment of the recreation value of the DOC-Give and DOC-Get land is required, rather than a comparison between the DOC-Give and other

areas of Belmont Regional Park. I remain of the view that the DOC-Get land is of lower recreational value.

The network of well used and maintained predator control lines and informal trails within the DOC-Give land indicates a level of use and community value, which is supported by the comments on the application from FoBRP. The fact that these trails may be informal or unsanctioned does not invalidate the level of use or the recreational value that people may attach to the area. I also note that FoBRP has roped off specimens of swamp maire, ramarama and *Coprosma rubra* to allow them to be viewed whilst protecting their fragile root systems. This would not be necessary if there were only very low levels of visitation to the DOC-Give land.

The site visits by myself and Mr Greenaway were undertaken several months apart during which time Winstone Aggregates lodged their application for land exchange. The routes that I observed in April 2026 were either not present or not observed at the time of Mr Greenaway's visits in June to September 2025. I note that winter and early spring would likely have been the time of lowest visitor use of the park. The routes were also not disclosed to Mr Greenaway by Greater Wellington Regional Council in April 2025 during preparation of his assessment.

Mr Greenaway contends that the more defined routes have been developed recently and most likely in response to heightened community interest in the Winstone land exchange proposal (point 15, p5). My assessment has been made from observations during my own site visits and the information that is currently available, and in my view reflects how the site is currently used and valued. I cannot speculate on conditions prior to my engagement with the application.

Mr Greenaway disagrees with the medium access rating given to the DOC-Give land in my assessment on the basis of a relatively long and physically demanding 1.7 km uphill approach along the Buchanan Road Tramping Track. He compares this to the ease of access to areas reached directly from main park entrances and car parks (point 19, p6).

I consider that this significantly overstates the difficulty of the walk along the Buchanan Road Track to the DOC-Get land. In my original assessment I also noted that there is a clear difference in the ease of access to and within the DOC-Give land compared to the DOC-Get. Even with the proposed access from Liverton Road, this still applies with respect to the Dry Creek and Firth Blocks, and part of the Northern Gully. I discuss the impact of the new proposed access to the Southern Gully under Improvement Package A, below.

In my report I described the initial 1.7 km of the Buchanan Road Tramping Track as a gravel 4WD road. Mr Greenaway correctly points out that this part of the

track is a “*Transpower service route formed and maintained for network access under statutory powers, with vehicle use generally limited to Transpower and GWRC staff*” and that “*it is not promoted or managed as a public 4WD recreation opportunity, and 4WD recreationists would not be able to access the track because there is a locked gate at the bottom of the hill*” (point 20, p6). I did not consider public 4WD access when rating the accessibility of the DOC-Give land, however I agree that it would more appropriately be described as a “gravel service road (that is generally limited to Transpower and GW vehicles).”

Finally, Mr Greenaway makes comments regarding social license which are also repeated in the planning memo prepared by Jade Wikaira. I have addressed these comments in my response to the planning memo, above.

3.3 Winstone Aggregates Improvement Package A

Improvements offered

Improvement Package A is premised on the pre-amendment version of section 29(2) of the Fast Track Approvals Act 2024 applying to the land exchange. Under that scenario, the values associated with the QEII covenant are not discounted.

In addition to the improvements offered by Winstone Aggregates as part of the land exchange application on 10 December, Improvement Package A would include:

- an increase in mammalian pest control from 5 to 10 years
- an increase in the number of ramarama included in plantings in the Dry Creek Block,
- provision for public access onto the DOC-Get land via the right of way to the Southern Gully off Liverton Road.

Feedback on Improvement Package

The applicant proposes that Improvement Package A would allow for mana whenua involvement in restoration activities and for visitors to directly experience the restoration plantings and would ensure there are opportunities for access and community involvement.

The Department would consider planting and restoration activities undertaken by mana whenua or appropriately authorised volunteer groups to be

conservation management activities. We would therefore expect to be able to use the right of way off Liverton Road for this purpose already under the terms of 10 December proposal. I do not consider that the opening up of the right of way to wider public use under Improvement Package A would confer any additional advantage for these activities.

Allowing access to the DOC-Get land from Liverton Road for recreational users would improve the recreational value of the proposed exchange by offering legal and practical access into the Southern Gully, the proposed plantings of swamp maire and the Northern Gully. It is also possible that this access could improve linkages with other areas of Belmont Regional Park, but I note that the terrain at the end of the Northern Gully is steep. If visitors are encouraged to use this area, fencing would need to be installed to discourage people from entering the quarry and overburden disposal areas from the Northern and Southern Gullies.

Liverton Road itself is a narrow access road that is single lane for much of its length. It has a number of blind corners and limited places for vehicles to pass. It is therefore poorly suited to supporting visitor use of the DOC-Get land.

Conditions

As managing a new access point at this location would not be a strategic priority for DOC and would impose additional costs on the Department, or other parties who may manage the area in future, it is important that these costs are borne by the Applicant. The following additional conditions are proposed.

1. A stile should be installed alongside the existing locked gate on Liverton Road, along with entry signage and a large orange triangle marker at the boundary of the DOC-Get land.
2. Within the Southern Gully a route should be marked and maintained by the applicant to direct visitors away from wetland areas and the vulnerable roots of the new plantings of swamp maire and other species.
3. The boundary between the Southern and Northern Gully blocks and the quarry land should be fully fenced at the applicant's expense with fencing funded and maintained by the Applicant. The same should apply to the boundary between these blocks and the adjacent private land.

4. If DOC is to manage the DOC-Get land, separate from Greater Wellington's management of Belmont Regional Park, DOC signage indicating the reserve name should be placed in the following locations to make the public aware of ownership and right of access:
 - At the boundary of the Southern Gully Block facing Liverton Road
 - On the Hebden Crescent frontages of the Firth and Dry Creek Blocks
 - On the existing easement on the Dry Creek Loop Track within the Dry Creek Block.
5. All assets described above should be funded, owned and maintained by the Applicant.

What is the conservation value rating of Package A

I consider that Improvement Package A would increase the "level of access" rating for the DOC-Get land from Low to Low-Medium. I note however, that the road access is relatively poor and that the right-of-way off Liverton Road would only enable improved access to less than half of the area of the DOC-Get land. The Firth and Dry Creek Blocks would remain difficult to access.

The swamp maire plantings in the Southern Gully would likely be of interest to some of the same visitors who currently access the DOC-Give land along with residents of the immediate area. However, the Southern Gully is a thin strip of highly modified land, parts of which are overrun by blackberry, located between lifestyle blocks on one side and the quarry on the other. The Northern Gully beyond is also modified with part having previously been used for overburden disposal.

The quality of experience will improve over time as weed control is undertaken and plantings establish, however, it is unlikely to provide a high quality visitor experience. I consider that it is unlikely to attract significant visitation given the range of other opportunities in Wellington and the Hutt Valley, the experience offered, and the difficult road access. My assessment of potential use of the DOC-Get land therefore remains low.

Improvement Package A does not change my assessment of other criteria for rating recreation value, and my overall assessment is that the recreation value of the DOC-Get land remains low.

3.4 Winstone Aggregates Improvement Package B

Improvements offered

Improvement Package B is premised on the post-amendment version of section 29(2) of the Fast Track Approvals Act 2024 applying to the land exchange. Under that scenario, the values associated with the QEII covenant are discounted.

In addition to the improvements offered in Improvement Package A and the 10 December land exchange application, Package B includes:

- additional planting of 200 ramarama and 200 swamp maire in two areas of the Dry Creek Recreation Reserve within Belmont Regional Park that are adjacent to the DOC-Give area.
- 5 years of weed management and 10 years of pest management in the Regional Park to assist with establishment of these plantings.

Feedback on improvement package

I have no comment on Improvement Package B as it is likely to have only a minimal effect on recreational values beyond what is proposed in Improvement Package A.

Conditions

No further conditions are recommended beyond those outlined for Improvement Package A

What is the conservation value rating of Package B

The improvements in Package B would have a negligible impact on recreation values beyond those offered in Improvement Package A. My assessment of the recreation value of the DOC-Get land under Improvement Package B is that it remains low.

5. Recommendation

My overall view of the conservation value of the DOC-Give and DOC-Get land is unchanged.

I consider the DOC-Give land to have low-medium recreation value and the DOC-Get land to have low recreation value.

Before the Fast-track Panel

Under: Fast-track Approvals Act 2024

In the matter of: FTAA-2603-L003 – Belmont Quarry Development Project – Land
Exchange

Statement of advice: Richard Nester

Heritage

Department of Conservation Senior Heritage Advisor

22 April 2026



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Introduction

1. My full name is Richard Paul Nester.

Instruction

2. I have been requested to provide expert advice on behalf of the Director-General of Conservation for her section 35 land exchange report required to be prepared under the Fast-Track Approvals Act 2024, for the Belmont Quarry project land exchange application.

Qualification and Experience

3. I am a Senior Heritage Advisor with the Department of Conservation's (DOC) Biodiversity, Heritage and Visitor Group based in Wellington and provide cultural heritage advice nationally and specific advice to the Lower North Island region. I have a Bachelor of Science in physical geography from the University of Otago (1994) and a Masters of Library and Information Studies from the Victoria University of Wellington (1997). I have been employed with the Department of Conservation for twenty-nine years, including 14 years as a Heritage Technical Officer and 15 years as a Heritage Advisor
4. My role in this project has been to review and provide technical comment on the heritage values, primarily the archaeological values of the Belmont Quarry Development Project.

Code of conduct

5. Whilst it is acknowledged this is not an Environment Court Proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this advice is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of advice and expert opinion

6. My expert advice relates to the following:

- i. Adequacy of the Applicant's assessment of the heritage values of the land proposed in the exchange, including any values that have been missed or not assessed.
- ii. The physical and documented evidence of tangible heritage values on the land areas defined in the Land Exchange report.
- iii. The impact of losing or gaining any areas or sites of heritage importance.

It should be noted that the broader cultural values identified and associated with mana whenua are not addressed in this report.

Material Considered

7. In preparing this advice I have reviewed the following documents as part of the land exchange application:

- i. Proposed land exchange for Wellington Belmont Quarry, OBDA, archaeological assessment: Prepared for Winstone Aggregates A Division of Fletcher Concrete and Infrastructure Ltd, by Clough and Associates Ltd, November 2025.
- ii. Land exchange report: An application by Winstone Aggregates for the Belmont quarry development: Prepared for Winstone Aggregates by Wikaira Consulting limited, 7 december 2025.
- iii. Email correspondance Appendix D8 Heritage NZ Pouhere Taonga
- iv. Data held on ARCHSITE – archaeological site recording scheme

Overview

8. Winstone Aggregates Ltd have proposed and applied for a land exchange with DOC to develop an overburden disposal area (OBDA) adjacent to the Belmont quarry, Lower Hutt. The land wanted for the OBDA is owned by DOC. There are 4 parcels of exchange land owned by Winstone Aggregates (Northern Gully, Southern Gully, Firth Block and the Dry Creek Gully). It is noted that two of the blocks offered for exchange have QEII covenants over them. These include the whole of the Firth Block and part of the Northern Gully. This document provides a technical assessment of the impacts on the heritage conservation values of the proposed land swap areas.
9. In general, my review of the Clough and Associates Archaeological report was found to be complete and thorough. Meetings held by the applicant and Heritage New Zealand Pouhere Taonga also concurred that the overall site low heritage values. My own review and findings of the sites, align with the above in that the potential is for only low value, tangible heritage to be located on the sites. Any transfer would not impact on the conservation of heritage values.
10. It should be noted that if any archaeological finds were made in the future, then the archaeological provisions of the Heritage New Zealand Pouhere Taonga Act 2014 would still apply. This could impact ongoing land management decisions for either DOC or Winstone Aggregates Ltd.

DOC Give site

11. The proposed Winstone Aggregates OBDA site has one recorded heritage site. It is recorded by the New Zealand Archaeological site recording scheme as R27/910 and is described as the remains of Farm Building and historic artefacts. The site includes a collapsed roof and associated building framing, roofing iron, concrete footings, fences and some artefacts (glass bottles).
12. Although this indicates a previous land use, the significance of it is low. The feature does not appear to be outstanding in nature or is unlikely to change our understanding of the land use in the local area. Irrespective of the significance of the site, if it is determined to be pre 1900 any change of land use would require an authorisation from Heritage New Zealand before the site could be modified in any way.
13. Currently this is a location not usually frequented by visitors, and there has been no attempt to manage and or conserve the heritage fabric of this site. This would be unlikely to change if the site were to remain under conservation management.

DOC Get sites

Firth Block (QEII)

14. This area of land has no recorded or known heritage associated with it.

Northern Gully (QEII area)

15. There are no recorded archaeological or heritage sites of significance inside the North Gully QEII land area. There is the potential for the partial remnants of a pre-1900 tramway used for timber extraction to be found in this area. At the time of writing, the tramway has not been discovered. The tramway is identified on a 1900 Deed Plan. Should it be found or located in the future, it is unlikely that it would be actively managed and would instead be formally recorded with protection being given through the Heritage New Zealand Pouhere Taonga Act as an archaeological site.

Northern Gully (Non QEII)

16. There are no recorded archaeological heritage sites of significance in North Gully area outside of the QEII land area. There is the potential for the partial remnants of a pre-1900 tramway used for timber extraction to be found in this area. At the time of writing, the tramway has not been discovered. The tramway is identified on a 1900 Deed Plan. Should it be found or located in the future, it is unlikely that it would be actively managed and would instead be formally recorded with protection being given through the Heritage New Zealand Pouhere Taonga Act as an archaeological site.

Southern Gully

17. There are no recorded archaeological heritage sites of significance in the Southern Gully land area. There is the potential for the partial remnants of a pre-1900 tramway used for timber extraction to be found in this area. At the time of writing, the tramway has not been discovered. The tramway is identified on a 1900 Deed Plan. Should it be found or located in the future it is unlikely that it would be actively managed and would instead be formally recorded with protection being given through the Heritage New Zealand Pouhere Taonga Act as an archaeological site.

Dry Creek

18. This area of land has no recorded or known heritage associated with it.

Overall assessment

19. The values of the DOC Give and DOC Get sites are identified in Tables 1 & 2. My overall assessment is as follows:

- Rating of the Heritage values of the DOC give site is **Low**
- Rating of the Heritage values of the DOC get site is **Low**

Comparative reporting of criteria assessment

Table 1 - DOC Give Sites

Criterion	Ranking	Comments
Aesthetic significance or value	Low	Minimal or no known aesthetic values relating to the heritage values at this site
Archaeological significance or value	Low – Med	Archaeological Site R27/910 is recorded on the DOC Give site – this represents a Post 1900 house site associated with farming. It is technically outside the legal definition of an archaeological site. It is described as the ‘remains of a farm building: wooden beams, corrugated iron roof, concrete floor, enclosure of concrete nib wall, bottles, strainer fencepost, patch of flowering daffodils. Possibly a piggery’. ⁱ
Architectural significance or value	Low	Remains of the house site shows characteristic building techniques that are unremarkable of the period
Cultural significance or value	Low	Refer cultural values report
Historical significance or value	Low	Some of the site is likely to include local significance relating to historic farming activities as indicated by previously mentioned site record R27/910
Scientific significance or value	Low	Minimal or no known scientific values relating to the heritage values at this site
Social significance or value	Low	Low to medium significance limited to local value or those associated with having been associated with the use of the land prior to the Quarry activity in the area
Spiritual significance or value	Low	Minimal or no known spiritual values relating to the heritage values at this site
Technological significance or value	Low	Minimal or no known technical values relating to the heritage values at this site
Traditional significance or value	Low	Minimal or no known traditional values relating to the heritage values at this site

Table 2 - DOC Get Sites

	Aesthetic value	Archaeological value	Architectural value	Cultural value	Historical value	Scientific value	Social value	Spiritual value	Technological value	Traditional value	Overall Heritage Value
DOC Give Site											
OBDA	L	L/M	L	L	L	L	L	L	L	L	L
DOC Get sites											
Dry Creek	L	L	L	L	L	L	L	L	L	L	L
Firth Block (QEII)	L	L	L	L	L	L	L	L	L	L	L
Northern Gully (QEII)	L	L/M	L	L	L	L	L	L	L	L	L
Northern Gully non QEII	L	L/M	L	L	L	L	L	L	L	L	L
Southern Gully	L	L	L	L	L	L	L	L	L	L	L

¹ NZAA Archsite site record form R27/910 accessed on the 10/4/2026