



Belmont Quarry Development – Part F

Substantive Application
Appendix F.1 – Land Exchange Application
Winstone Aggregates

16 August 2026



LAND EXCHANGE REPORT

AN APPLICATION BY WINSTONE AGGREGATES
FOR THE BELMONT QUARRY DEVELOPMENT

PREPARED FOR
WINSTONE AGGREGATES

DATE
7 December 2025



Report prepared by Wikaira Consulting Limited for WINSTONE AGGREGATES.

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REFERENCE

This report has been prepared by Wikaira Consulting Limited for a proposed land exchange to be considered under the Fast-track Approvals Act 2024. This report forms part of the application lodged on behalf of Winstone Aggregates in relation to the Belmont Quarry Development project.

USE OF DOCUMENT

This document is intended for the sole use of the applicant and relevant decision-making authorities considering the land exchange proposal. It should be read in conjunction with the full suite of technical and statutory information submitted as part of the substantive application. The findings, assessments, and conclusions contained in this report are based on information available at the time of preparation and should not be used for any other purpose without the written permission of the author.

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1.0 DOC Land Exchange Form

- 1.1 **Appendix A0** contains a cover letter made out to the Director-General.
- 1.2 **Appendix A1** contains a list of all documents lodged.
- 1.3 **Appendix A2** contains DOC Land Exchange application form.

2.0 Executive Summary

- 2.1 The Belmont Quarry Development Project is listed in Schedule 2 of the Fast track Approvals Act 2024 (FTAA) and is eligible to seek approvals through the fast-track process. Belmont Quarry supplies a large share of Wellington's aggregate demand. Continued access to overburden capacity is critical to maintaining a reliable supply of high-quality aggregate for infrastructure and construction projects across the Wellington Region.
- 2.2 As a first step in the fast-track process Winstone Aggregates seeks a land exchange under section 33 and Schedule 6 of the Fast-track Approvals Act 2024. The exchange involves up to 34 hectares of Fletcher-owned land to be added to the conservation estate and approximately 23.24 - 23.86 ha hectares¹ of conservation land within Belmont Regional Park to be transferred to Winstone Aggregates (subject to confirmation on completion of topographical survey). This application forms part of a broader development proposal that will be advanced through a subsequent substantive application under section 42 of the FTAA.
- 2.3 This exchange application uses the terms DOC-Get and DOC-Give to describe both sets of land for exchange. DOC-Get refers to the four Fletcher-owned parcels proposed to be transferred to the conservation estate including the Northern Gully, Southern Gully, Firth and Dry Creek blocks. DOC-Give refers to the Crown reserve land within Belmont Regional Park that Winstone seek to obtain for an overburden disposal area as part of the Belmont Quarry Development Project.
- 2.4 A comparative assessment of the conservation values of both sets of land, the DOC-Get and DOC-Give areas, found that the Crown will receive land with higher conservation values particularly in terms of ecological, hydrological and landscape values and aspects. Recreational and archaeological values remained unchanged. The assessment concluded the exchange will provide a net benefit to the conservation estate.
- 2.5 Winstone completed an extensive consultation and engagement programme with relevant local authorities, iwi authorities and Treaty settlement entities, relevant administering agenda and holders of interests in land to be exchanged by the Crown. Engagement was early, proactive and supported by clear communication through site visits, meetings, online hui, emails and a dedicated project website. Feedback shaped the land exchange parameters and conservation values assessment.

¹ 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 and its context to the technical report writer. In the application as to how this area is described due to slightly 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 a slight change in the description of area from approximately 23.86 ha (including the paper road area) to 23.24 ha (approximately). For avoidance of doubt, the area including the paper road is sought for exchange and will form part of the footprint for the RMA approvals in the substantive application.

- 2.6 Overall the exchange results in a net conservation benefit across ecological, hydrological and landscape values.
- 2.7 In addition to this Winstone proposes an improvement package informed by the consultation and developed with mana whenua and technical experts. The package is designed to enhance the conservation values of the land managed by DOC and includes targeted pest control, weed management and ecological restoration opportunities with mana whenua. It confirms how investment will be directed towards priority actions and provides the basis for the Panel to assess net conservation benefit and to frame any conditions relating to improvement works.

3.0 Introduction

- 3.1 The Belmont Quarry Development Project (Project) is a listed project under Schedule 2 of the Fast-track Approvals Act 2024 (FTAA).² The project was listed on the basis that it would deliver significant economic benefits. As a listed project, it is eligible to seek approvals through the fast-track process established by the FTAA.
- 3.2 This land exchange application is submitted by Winstone Aggregates (Winstone), a division of Fletcher Concrete and Infrastructure Limited (Fletcher),³ pursuant to section 33(1) of the FTAA and Schedule 6, which sets out the process for land exchanges involving conservation areas and Crown-owned reserves. Fletcher is the parent company of Winstone Aggregates and owns the land Winstone offers in exchange. For clarity and consistency, Winstone is used throughout this application when referring to the applicant. This application forms part of a broader development proposal that will be advanced through a subsequent substantive application under section 42 of the FTAA.
- 3.3 The planned new overburden disposal area (OBDA) is adjacent to the existing quarry footprint and will extend the life of the quarry. This is critical to maintaining a reliable supply of high-quality aggregate for infrastructure and construction projects across the Wellington Region.
- 3.4 As the first step in the fast-track process, Winstone seeks a land exchange involving up to 34 ha of Fletcher-owned land to be added to the conservation estate. In exchange, approximately 23.24 - 23.86 hectares of conservation land within Belmont Regional Park are proposed for exchange to Winstone.
- 3.5 In this report, exchange land refers to the conservation land administered by Greater Wellington Regional Council (GWRC) on behalf of the Department of Conservation (DOC) that is proposed to be transferred to Winstone, and the Fletcher-owned land proposed to be added to the conservation estate, consistent with the definition in Clause 22(1) of Schedule 6.
- 3.6 This report is prepared in accordance with section 33(1) and Schedule 6 of the FTAA for the Director-General of Conservation's consideration of the proposed land exchange. A substantive application under section 42 will follow to address the remaining approvals required for Belmont Quarry, including resource consents, wildlife permits, and an archaeological authority.

² The project was listed on the Ministry for the Environment website on 19 December 2024, as Application FTA308.

³ Winstone Aggregates is the authorised person listed in Schedule 2.

Introduction to the Winstone Aggregates

- 3.7 Winstone is one of New Zealand's largest aggregate producers, with the resources and capability to provide a reliable supply for construction and infrastructure projects nationwide. Its operations span multiple regions, supplying materials essential for roading, rail development, housing, and nationally significant public infrastructure.
- 3.8 Belmont Quarry is central to this role. Quarrying on the site began in the 1920s, and it has contributed to Wellington's growth for over a century. Winstone assumed operation in the 1980s, and the quarry has remained one of the region's principal sources of aggregate. This continuity has ensured Wellington has retained a stable, locally available supply of aggregate to support regional development.
- 3.9 At present, Belmont Quarry supplies approximately 40% of the Wellington Region's total aggregate demand and more than 50% of its high-grade aggregate. This material is essential for concrete production and road surfacing. The quarry's proximity to Wellington's central business district (22 km) reduces transport costs, lowers emissions from haulage, and provides resilience against supply shortages. In contrast, other sources of aggregate around the region have become inaccessible over time due to urban development, reinforcing Belmont Quarry's strategic importance.
- 3.10 Belmont Quarry is managed under a comprehensive suite of district plan provisions and district and regional consents for extraction, overburden disposal, water quality management, and ecological protection. Winstone has invested in on-site water treatment and monitoring systems to ensure compliance, supporting sustainable operations and long-term access to the resource. These systems reflect a wider corporate commitment to sustainable operations and minimising environmental effects, while securing long-term access to the resource.

Background

- 3.11 Winstone has been seeking to establish additional overburden capacity at Belmont Quarry since 2015 to secure a continued regional supply. Overburden has been managed through a staged programme; however, existing overburden management sites within the current quarry footprint are nearing capacity. The Project will deliver significant regional benefits by securing aggregate supply for infrastructure and housing and has been accepted as a listed project under Schedule 2 of the FTAA.
- 3.12 Overburden generated from quarry operations is currently deposited in the Cottle Overburden Disposal Area (Cottle OBDA) located on Fletcher-owned land (Lots 4, 5 DP 322126, Lot 2 DP 60552). However, this site has reached capacity for overburden disposal. The overburden placement consented as part of the Cottle OBDA has been completed, and other options for disposal on site have been exhausted. The Cottle consents continue to operate for fines disposal only and this aspect of the consent will continue for approximately 14 years. No additional disposal options exist within the current quarry footprint
- 3.13 To sustain operations and meet the long-term aggregate needs of the Wellington Region, Winstone is seeking to establish a new OBDA directly north of the existing quarry. The preferred OBDA location lies within Belmont Regional Park.
- 3.14 The land exchange application marks an early and necessary step in enabling the proposed OBDA. This proposal reflects Winstone's continued commitment to maintaining a secure, sustainable aggregate supply chain for the region while contributing to broader environmental outcomes.
- 3.15 The proposed OBDA is the only viable option adjacent to the quarry and is critical for unlocking additional aggregate reserves. Without a solution, the quarry's operational life would be significantly shortened, likely leading to closure in the medium term. By contrast, enabling overburden placement in the proposed area would extend the operational life of Belmont Quarry by approximately 35 -40 years, supporting long-term regional infrastructure development.

Alternatives and Options

- 3.16 Since 2016, Winstone has undertaken a series of investigations into alternative locations for overburden disposal at Belmont Quarry. Options were tested both within and outside the quarry footprint, and included early feasibility assessments, ecological surveys, technical design work, and engagement with relevant authorities.
- 3.17 The evaluation process confirmed that while several options were technically feasible, each presented constraints that prevented them from being a practicable long-term solution. The Belmont Regional Park land exchange was advanced as the preferred pathway, as it provides sufficient capacity, is aligned with statutory and planning frameworks, and delivers conservation gains. Winstone commenced informal discussions with relevant stakeholders about the prospect of an exchange in 2017, but this is the first time an application has been made.
- 3.18 A summary of the options considered is set out below.

Table 1: Options considered for Belmont Quarry overburden disposal.

Option	Description	Key Findings	Outcome
1. Old Farm Hilltop (2016)	Ridge east of the quarry, within Belmont Regional Park.	Ecological survey identified negligible values; planning and management constraints limited feasibility.	Not progressed.
2. Northern Gully (2022)	Within the quarry footprint, regenerating vegetation and perennial stream, QEII covenant.	High ecological values and statutory constraints; significant consenting risk and could only accommodate 50% of the capacity required.	Not progressed.
3. Belmont Regional Park Land Exchange (2017-Present)	Exchange of quarry-owned land for adjacent regional park land administered by GWRC on behalf of DOC.	Adds higher ecological value land (Northern Tawa Forest, Dry Creek) to the conservation estate; provides long-term OBDA capacity.	Preferred option.
4. Internal OBDA Variants (2021-2023)	Redevelopment of Dry Creek and Cottle Block OBDAs; alternative containment designs within quarry footprint.	Dry Creek's capacity had been exhausted and rehabilitated; Cottle Block has limited remaining capacity; other variants are constrained by stability, yield, or other effects.	Not progressed.

Technical Reports and Supporting Material

- 3.19 The preparation of this land exchange application has drawn on the following technical reports and supporting material commissioned by Winstone to better understand both the values and features of the land included in the exchange.

Table 2: Expert evidence relied upon in this assessment.

Discipline and description	Assessment Details		
	Expert / Organisation	Date	Title
Conservation Values			
Ecology	BlueGreen Ecology Ltd	02/12/2025	<i>Belmont Quarry Land Exchange. Overview of Ecological Values. Prepared for Winstone Aggregates Ltd. Appendix B1</i>
	Blueprint Ecology Ltd	03/12/2025	<i>Belmont Quarry Land Exchange: Lizard Assessment. Appendix B2</i>
	Boffa Miskell Ltd	05/11/2025	<i>Belmont Quarry: Acoustic Bay Survey Results prepared for Winstone Aggregates. Appendix B3</i>
Recreation	Rob Greenaway & Associates	07/12/2025	<i>Winstone Aggregates Belmont Quarry Development Land Exchange Proposal Recreation Assessment. Appendix B4</i>
Archaeology	Clough & Associates Ltd	November 2025	<i>Proposed Land Exchange for Wellington Belmont Quarry, OBDA: Archaeological Assessment. Prepared for Winstone Aggregates Ltd. Appendix B5</i>

Landscape	Boffa Miskell Ltd	01/12/2025	<i>Belmont Quarry Overburden: Land Exchange. Landscape Assessment prepared for Winstone Aggregates. Appendix B6a</i>
		26/11/2025	<i>Belmont Quarry Overburden: Land Exchange, Land Assessment prepared for Winstone Aggregates Appendix B6b</i>
Cultural Values	Hikoikoi Management Limited on behalf of Taranaki Whānui ki te Upoko o Te Ika	December 2025	<i>Cultural Values Assessment – Belmont Quarry Land Exchange Appendix B7</i>
Economics	Market Economics Ltd	03/12/2025	<i>Belmont Quarry – Winstone Aggregates. Assessment of economic effects for Fast-track approval. Appendix B8</i>
Hydrology	Landscape Dynamics Ltd	03/12/2025	<i>Belmont Quarry – Hydrological analysis of proposed land exchange Appendix B9</i>
Supporting Reports			
Survey	AdamsonShaw Ltd	04/12/2025	<i>Scheme plans 21890 SC-01 to SC-06. Rev J. (Sheets: 6) Appendix B10</i>
	AdamsonShaw Ltd	25/11/2025	<i>Summary of existing easements and title instruments – V3. For Winstone Aggregates - Potential Land Exchange.</i>
Land Valuation	Colliers	26/08/25 (Rev 04/12/25).	<i>Valuation Report. Proposed land exchange 1 Hebden Crescent, Belmont, Lower Hutt. Appendix B11</i>
Geotechnical	Baseline Geotechnical Ltd	01/12/2025	<i>Geotechnical Appraisal Report. Land Exchange Belmont Quarry Development Project. Wellington. Appendix B12</i>
Land Contamination	Pattle Delamore Partners Ltd	27/11/2025	<i>Preliminary site investigation – Belmont Quarry – Firth Block, Northern Gully, and Southern Gully. Appendix B13a</i>
	Pattle Delamore Partners Ltd	12/09/2025	<i>Preliminary and detailed site investigation – Dry Creek - Belmont Quarry. Appendix B13b</i>
Climate Change and Natural Hazards	Awa Environmental Ltd	26/11/2025	<i>Flood and Climate Change Risk Assessment. Belmont Quarry Land Exchange. Appendix B14</i>
Health and Safety	Winstone Aggregates	December 2025	<i>Memorandum: Health and Safety aspects arising from interaction between Belmont Quarry operations and neighbouring land and proposed land exchange with Department of Conservation. Appendix B15</i>

Definitions

3.20 Unless the context requires otherwise:

Table 3: Terms used in this report.

Acronym	Meaning
Act	means the Fast-track Approvals Act 2024.
AMSL	means above mean sea level.
Belmont Quarry	means the existing rock quarry on Lot 1 DP 60552.
CGP 2005	means the Conservation General Policy 2005.
Cottle Block or Cottle OBDA	means the existing OBDA located on Fletcher-owned land, Lots 4 and 5 DP 322126, Lot 2 DP 60552.
DOC	means the Department of Conservation.
DOC-Get	means the land areas owned by Fletcher and proposed for acquisition by DOC.
DOC-Give	means the land areas owned by DOC and proposed for exchange with Fletcher.
DP	means Deposited Plan.
Dry Creek	means the retired quarry on Part Lot 1 DP 28205, and the DOC-Get area located on the lot.
DSI	Detailed Site Investigation
Firth Block	refers to the DOC-Get area on Part Lot 1 DP 22561.
Fletcher	means Fletcher Concrete and Infrastructure Limited.
GWRC	means Greater Wellington Regional Council.
Ha	means hectares.
Lot	means allotment.
m²	means square metres.
m³	means cubic metres.
Northern Gully	refers to the DOC-Get area on Lot 1 DP 60552 and Lot 5 DP 322126.
NRP	means Natural Resources Plan
OBDA	means the proposed Overburden Disposal Area shown on Figure 1 of page 13.
Panel	means the Panel in FTAA 2024 Schedule 3.
PSI	Preliminary Site Investigation
RFR	means Right of First Refusal.
RMA 1991	means the Resource Management Act 1991.
Southern Gully	refers to the DOC-Get area on Lots 4 and 5 DP 322126
Winstone	means Winstone Aggregates.

4.0 Scope of Application (s 29-33)

Application for Land Exchange (s 33)

- 4.1 This application seeks approval for the transfer of approximately 34 hectares of land owned by Fletcher into the conservation estate, in exchange for approximately 23.86 hectares of Crown-owned land located within the Belmont Regional Park.
- 4.2 The scope of this report is confined to the statutory matters relevant to land exchange under the Act. It is prepared in accordance with section 33 of the Act and provides the information required by sections 33, 43(2) and clauses 23–24 of Schedule 6. Under these provisions, an application is submitted to DOC, and DOC then prepares a report under section 35. DOC's report is then submitted to the Panel at a later stage when the applicant lodges a substantive application for other approvals under the Act.
- 4.3 This application does not seek authorisation for any physical works, including the placement of overburden material, or construction and earthworks activities, associated with developing the new OBDA. Those activities will be addressed in the substantive application under section 42 of the Act. They will include requests for the full suite of approvals needed to implement the broader Project.

5.0 Site context (Sch 6, Sec 23)

- 5.1 This section describes the land areas relevant to the proposed exchange between Fletcher and the Crown. It identifies the four areas of land proposed for transfer to the Crown (the DOC-Get areas) and the area of land to be transferred to Fletcher (the DOC-Give area). It identifies the location and operational setting of Belmont Quarry within the Wellington Region and its relationship to adjoining Crown land within Belmont Regional Park. It provides legal descriptions, ownership details, and the applicable district and regional plan provisions for all affected parcels, supported by maps and scheme plans. This section also records existing open space covenants, site access arrangements, network utilities, and relevant statutory instruments to establish the physical and planning context for the proposed exchange.

Site Description: Planning

- 5.2 This section describes the planning environment of the proposed reserve exchange land parcels.

Regional and District Planning Context

- 5.3 The district and regional planning context for the proposed land exchange reflects the differing land uses and management purposes of the DOC-Give and DOC-Get areas. The table below summarises the operative and proposed district plan provisions, along with the relevant classifications under the Natural Resources Plan (NRP).

Table 4: Plan zoning of the proposed exchange parcels.

Instrument	DOC-Get	DOC-Give
City of Lower Hutt District Plan (PC56 version)	Extraction Activity Area	General Recreation Activity Area
Proposed Lower Hutt District Plan 2025	Quarry Zone	Natural Open Space Zone
Wellington RPS and NRP	Te Whanganui-a-Tara Whaitua Te Awa Kairangi Catchment Management Unit (CMU).	

- 5.4 Resource consents are being sought under these planning instruments through the FTAA process; details of this are presented in Section 6 of this report.

Toitū Te Whenua Parks Network Plan 2020-2030

- 5.5 Toitū Te Whenua is the management plan for eight regional parks and forests in the Wellington Region. It includes Akatarawa, Battle Hill, Belmont, East Harbour (including the Northern Forest, Baring Head/ Ōrua Pouanui and Parangarahu Lakes), Kaitoke, Pakuratahi, Queen Elizabeth and Wainuiomata parks.
- 5.6 GWRC approved Toitū Te Whenua on 10 December 2020. This management plan provides directions for these parks managed under the Reserves Act 1977. Toitū Te Whenua supersedes the 1996 Management Plan for Belmont Regional Park.

- 5.7 Within Belmont Regional Park, Toitū Te Whenua currently applies to the DOC-Give area. If the proposed land exchange is approved, this land would be removed from the regional park, and consequently, the plan would no longer apply.

Spatial survey

- 5.8 The DOC-Give and DOC-Get land parcels are illustrated on scheme plans prepared by Adamson Shaw and provided in **Appendix B10**. The plans show legal boundaries, land titles, and parcel areas, and identify the location of the proposed exchange blocks in relation to the Belmont Quarry footprint, adjoining regional park land, and key infrastructure corridors. The plans also show the extent of a paper road. Winstone intends to apply to partially stop and realign this paper road as a separate process (as road stopping is not an available approval under the FTAA). The scheme plans form the primary spatial reference for the land exchange proposal.
- 5.9 As part of the subsequent substantive application under section 42 of the FTAA resource (subdivision) consent will be sought to give effect to the land exchange. This will enable the subdivision for the creation of new allotments that will then be exchanged through a conveyancing process.
- 5.10 This report should be read in conjunction with '*Summary of existing easements and title instruments – V3. For Winstone Aggregates - Potential Land Exchange*', provided in **Appendix B10b**.

Site Description: DOC-Gets

- 5.11 Fletcher proposes to transfer four land parcels to the conservation estate owned by DOC. These are the Northern Gully, Southern Gully, Firth, and Dry Creek blocks. Together they comprise 34 hectares of land (more or less) adjoining Belmont Regional Park and include a mix of forest, scrub, and wetland environments.

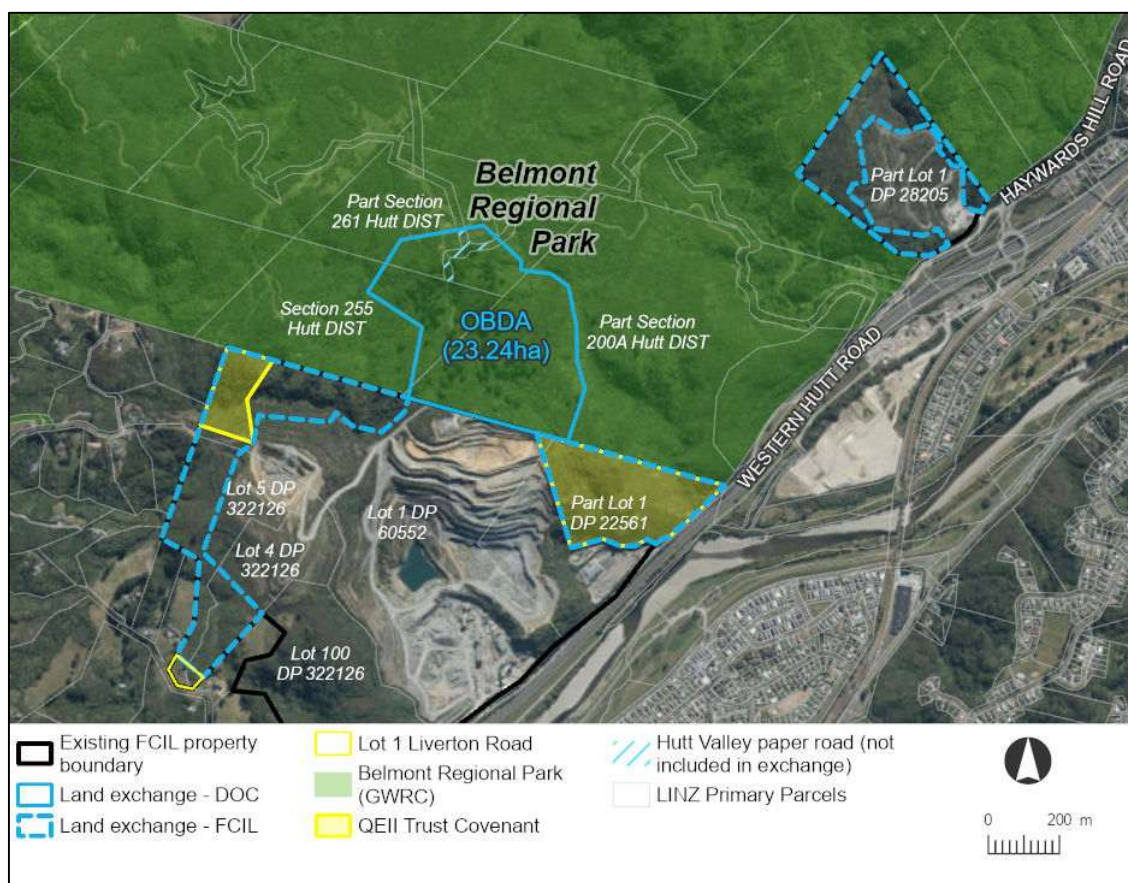


Figure 1: Overview of Proposed Land Exchange Parcels.

DOC-Get: Northern Gully (12.62 ha) (Sch 6, Sec 23(1))

Introduction

- 5.12 The Northern Gully is located to the north-west of the quarry (see Figure 2). This parcel comprises south-facing hill slopes and deep gullies with forested stream margins. The Northern Gully comprises an elongated, broadly L-shaped block of 12.62 ha. It is situated across the northwestern corners of Lot 5 DP 322126 and Lot 1 DP 60552. Open Space Covenant 5-07-755 (Covenant 10476608.1) is located in the northwest corner of the Northern Gully (outlined in yellow, see Figure 2).
- 5.13 The Northern Gully site is subject to a Queen Elizabeth the Second Trust (QEII) Open Space Covenant, which is addressed later in this section.

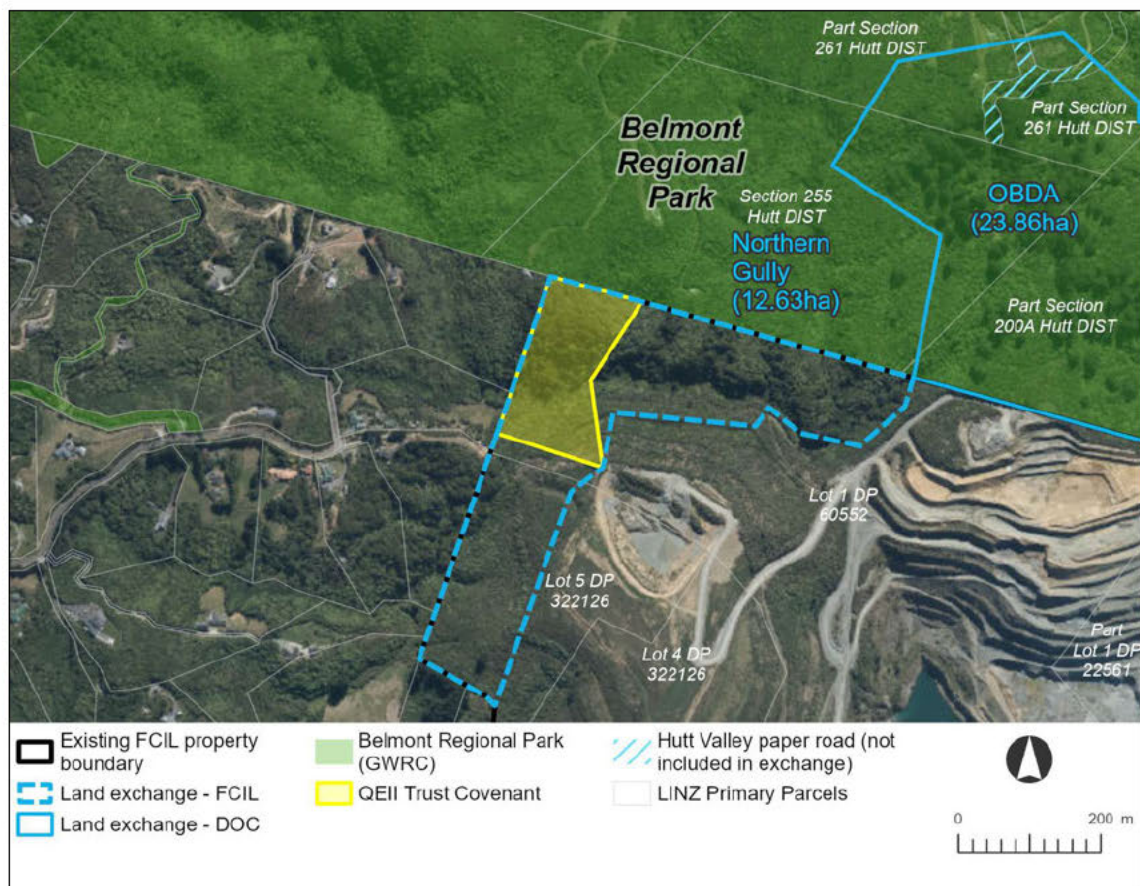


Figure 2: Northern Gully Block and QEII Covenant area.

Table 5: Features and values of the Northern Gully Block.

Overview of Key Features and Values	
Value	Description of key features
Ecology	Established native forest with a dominant tawa kamahi and pukatea canopy spans the northern side of the watercourse. Outside these established forest areas, the remainder of the block comprises mid- to early-seral regenerating native bush. The southern portion of Lot 5 DP 322126 has been subject to overburden placement and subsequent rehabilitation, including native planting.
Landscape	A watercourse traverses the block along the northern boundary of Lot 1 DP 60552 before being piped beneath the quarry to Te Awa Kairangi / Hutt River. Contours on the north side of the watercourse rise to approximately 200 metres above mean sea level.
Recreation	The block is private property used for operational and restoration purposes and has no public access or recreational use.
Mana Whenua	Northern Gully forms part of Pōkaimangumangu, the name gifted by Te Ati Awa rangatira Te Wharepōuri to the Western Hills, which anchors the Belmont landscape in whakapapa. The block contains mature tawa, kamahi and pukatea forest, along with fragments of old canopy tawa and an existing QEII covenant. Its ngahere holds mouri and expresses

	enduring association and kaitiakitanga through continuous indigenous cover.
Archaeology	There may be remnants of a logging tramway in the block, which indicates potential archaeological value.
Geotechnical	The proposed Northern Gully land exchange parcel comprises either: i. natural, unmodified slopes that show no evidence of significant instability, or ii. rehabilitated OBDA slopes that are designed to achieve acceptable levels of stability. There is a limited slope instability hazard in the proposed exchange parcel, with negligible risk to persons and conservation values.
Land Contamination	Pattle Delamore Partners Ltd presents a Preliminary Site Investigation (PSI) for the Northern Gully. The Northern Gully has historically received cleanfill from other parts of the site. They conclude that 'this material is unlikely to have contributed to soil contamination within the Northern Gully'.
Hydrology	The surface water body within Northern Gully comprises of the mid-reach of the main stem of the Waikoropupu Stream from the West, and the lower reach of the second tributary from the North. This is shown in Figure 2.3 of Landscape Dynamics (2025).

DOC-Get: Southern Gully (3.94 ha) (Sch 6, Sec 23(1))

Introduction

5.14 The proposed Southern Gully area is 3.9 hectares, which skirts the lower south-west extent of overburden deposited in the Cottle Block and is contiguous with the Northern Gully along its western extent. This aspect of the proposed land exchange forms a lower vegetated gully that separates modified terraces that are gradually revegetating in the Cottle Block, and a rural lifestyle development established along Liverton Road.

5.15 Southern Gully is subject to:

- Existing easement for Right of Way (ROW), Telecoms, and Electricity Supply created by Easement 5835385.4, which burdens Lot 4 DP 322126 (the southern allotment) and benefits Lot 5 DP 322126 (the northern allotment). Fletcher owns both Lots 4 and 5 DP 322126. As shown on the scheme plans, Easement 5835385.4 has been replaced by Area Z over Lot 10 into Lot 9 (Reserve) for Right of Way. The Telecommunications and Electricity Supply easements are no longer required.
- Existing Easements in Gross (in favour of Fletcher) This is an easement/private Land Covenant in favour of Fletcher (Grantee) over Lots 4, 5 & 100 DP 322126 (Grantor) for the emission of noise, vibration, earthworks, and dust of Lots 4 and 5.
- For more details see the survey memo from AdamsonShaw, in **Appendix B10b**.
- Consent Notice 5835385.2, 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) and does not affect the use of the land for quarrying activities or conservation activities.

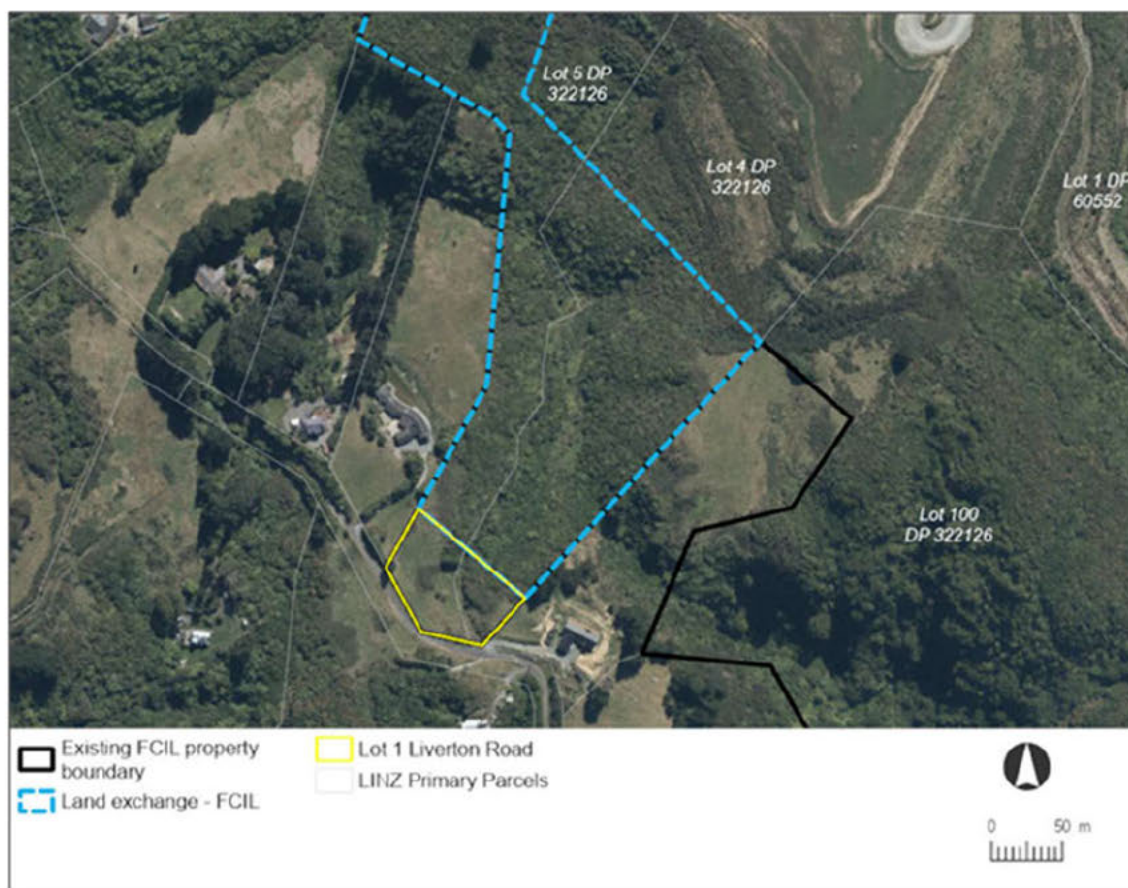


Figure 3: The Southern Gully.

Table 6: Features and values of the Southern Gully.

Overview of Key Features and Values	
Values	Description of key features
Ecology	The Southern Gully is predominantly surrounded by late-stage, mid-successional native vegetation, while the natural inland wetland area itself is regenerating after being historically covered in exotic pasture grasses used for grazing purposes. The Southern Gully comprises a large area of poorly drained soil, which is relatively unique when viewed in the context of the surrounding area. As noted within the BlueGreen Ecology (2025) report, 'A range of wetland plants have been planted already. These include lowland ribbon wood, toi toi, carex secta, harakeke and lacebark. These factors make the site an ideal nursery and restoration area for growing both pukatea and swamp maire.
Landscape	The Southern Gully straddles the middle section of an unnamed catchment which commences from the headwaters below Kaitangata Crescent and flows east into a steeper vegetated gully to the north of

	Liverton Road. The centre of the gully contains an approximate 225 metre section of unnamed stream corridor comprising areas of wetland before flowing through a steeper gorge-like section down a series of waterfalls adjoining Te Awa Kairangi/The Hutt River. The physical attribute of the Southern Gully is influenced by a range of seepages from the surrounding hills, as well as natural barriers downstream that impede flows and back up groundwater. The existing wetland area comprises approximately 0.27 ha and is relatively large for the local area.
Recreation	Access into the wetland area can be easily established from the road frontage between 174 Liverton Road and 184 Liverton Road, where an existing benched access track leads from the road down into the gully. This track is currently overgrown with dense patches of blackberry. The drain on the inside of the track has become blocked in places, causing parts of the track to become boggy. The top of the site adjoining Liverton Road also presents future opportunities for ecological restoration through weed control and revegetation.
Mana Whenua	The Southern Gully is approximately 4 hectares in size and sits on the floor of an open north to south catchment. The unnamed stream moves through a wetland area before entering a steeper gorge-like section and cascading over a series of waterfalls. It then flows into Te Awa Kairangi which is recognised through a statutory area in Schedule 1 of the Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009. This strengthens the cultural significance of the Southern Gully and its hydrological and spiritual connection to Te Awa Kairangi.
Archaeology	If any unrecorded sites are located in the Northern and Southern Gullies, they are most likely associated with early European settlement activities. It is noted that a 19th-century tramway associated with timber extraction is described as being located in the area containing the current Belmont Quarry on a 1900 plan and also in an accompanying written newspaper description. The exact location of the tramway has not been established, although it is considered possible that it may have been partially located within the Southern and Northern Gully lands to be exchanged.
Geotechnical	Since the construction of this section of the Cottle OBDA was completed in 2015, the site has been rehabilitated and revegetated. There has been no instability observed in final slopes within the Cottle OBDA since construction commenced in the mid-2000s. Baseline Geotechnical Ltd (2025), have confirmed there is limited slope instability hazard in this proposed exchange parcel, and there is a negligible risk to persons and to conservation values.
Land Contamination	Pattle Delamore Partners Ltd (2025) note the Southern Gully has remained generally unchanged, with an access road present between 1957 and 2000 to the Northern Gully. The site is not identified on GWRC's SLUR and no other evidence of HAIL activities have been identified. Part of the site covered by an overburden disposal area includes material described as stop soil and weathered

	rock. This material is unlikely to have contributed to soil contamination within the Southern Gully.
Hydrology	The Southern Gully contains a large natural inland wetland and a surface water body which results from a small catchment that drains under Kaitangata Road. The unnamed tributary drains between Liverton Road and the Cottle Block, before ultimately discharging under SH2 to Te Awa Kairangi / Hutt River.

DOC-Get: Firth Block (9.6 ha) (Sch 6, Sec 23(1))

Introduction

- 5.16 Located to the east of the Belmont Quarry is the Firth Block, which comprises a QEII-covenanted parcel with high ridgeline and steep south-facing slopes (Figure 3). The Firth Block is primarily located on Part Lot 1 of DP 22561, with a small triangle in the northeastern corner of Lot 1 DP 60552. Firth Block comprises a truncated triangular area of approximately 9.6 ha.
- 5.17 Firth Block (Pt Lot DP 22561 (RT WN31D/969)) is subject to:
- Encumbrance 9032630.1 (shown as F on the Adamson Shaw Ltd plans) in favour of HCC for the protection of vegetation on this part of the Land. The area is 7m wide and adjoins the northern boundary of Part Lot 1 DP 22561. As this encumbrance area falls within the existing QEII area, the vegetation is already protected. Winstone is in the process of seeking discharge of this encumbrance.
 - This part of the Land also falls within the Open Space Covenant Area E (as shown on the AdamsonShaw plans).

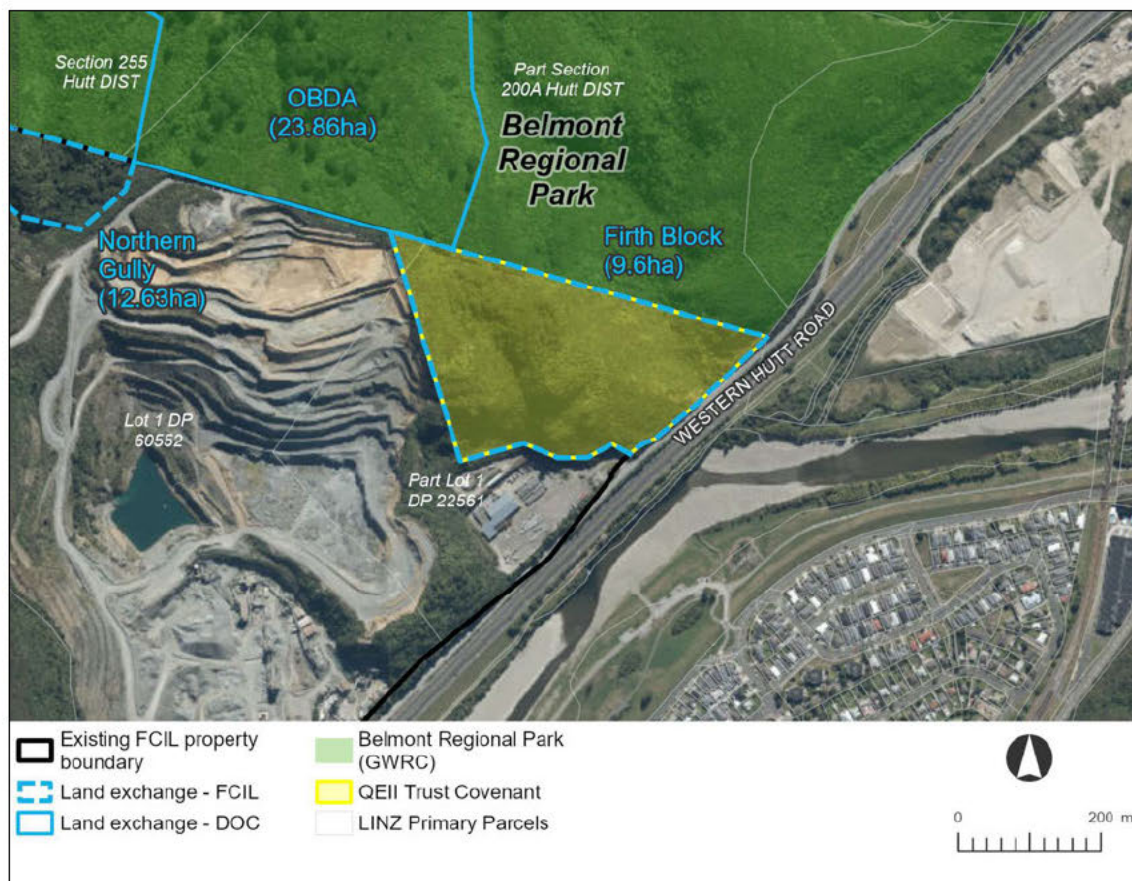


Figure 4: Firth Block and QEII Covenant area

Table 7: Features and values of the Firth Block.

Overview of Key Features and Values	
Values	Description of key features
Ecology	Vegetation in the Firth Block is a mix of broadleaf scrub and tree fern mosaics, with an older tawa stand at the head of a south-draining gully. Small patches of manuka occur on upper slopes, while the eastern faces contain mid-seral forest with mapou in the canopy. The ridgeline and slopes provide continuity of native cover across the block. A farm pond and associated wetland are located near the boundary of the Firth Block with the proposed OBDA. These features increase habitat diversity for freshwater invertebrates, with no fish recorded. The block is within the wider home range of native bird species recorded in Belmont Regional Park.
Landscape	The landform includes early and mid-seral broadleaf scrub regeneration on steep and very steep faces. The seral stages have largely progressed beyond the gorse phase, forming a predominantly indigenous canopy. The contours in the block are generally very steep, rising sharply from the Hutt Valley floor. There are two intermittent waterways located within a larger central gully and a smaller gully in the northeastern corner of the block. Firth Block is covered in a mix of

	regenerating native forest with pockets of established native forest at the head of the central gully.
Recreation	There is no public access or recreational use of Firth Block as it is private property and used for operational and restoration purposes.
Mana Whenua	Firth Block demonstrates the principles of Ki Uta Ki Tai and cultural integrity through its ridgelines, regenerating vegetation, and wetland features. These natural attributes contribute to the continuity of the Belmont landscape. Cultural values are expected to remain consistent, though the block provides a setting where mana whenua may wish to influence how the mauri of water and vegetation health is understood and managed in future.
Archaeology	Firth Block has no known archaeological value.
Geotechnical	Baseline Geotechnical (2025) identified that remnant quarry batters form part of the Firth Block land proposed for exchange. There has been no evidence of large-scale slope instability since the quarry batters were completed over 50 years ago and performance is consistent with a closed quarry. The site is now substantially heavily vegetated. The report notes that provided the setback in Area C is adopted then there is low risk of instability in the adjacent Belmont Quarry slopes affecting persons accessing the Firth Block exchange area.
Land Contamination	Pattle Delamore Partners Ltd (27/11/25) presents a pre-liminary site investigation (PSI) for the Firth Block. Historical aerial photography shows that the site has been subject to extraction and overburden placement activities. The northwestern portion of the Firth Block (approx. 1925 m ²) falls within the SLUR delineation for the property. The report concludes that it is more likely than not that no HAIL activities have been undertaken at Firth Block (and Northern or Southern Gully) and therefore the NES-CS and contaminated rules in GWRC NRP do not apply.
Hydrological	This area comprises the mid-reaches of one tributary and the lower reaches of a larger tributary of the stream immediately north of the Waikoropupu catchment (see Figure 2.6 of Landscape Dynamics (2025) at Appendix B9). The addition of the second reach will provide a direct hydraulic connection between the Hutt River and streams within the Regional Park.

DOC-Get: Dry Creek (7.94 ha) (Sch 6, Sec 23(1))

Introduction

- 5.18 The exchange area referred to as Dry Creek is situated entirely on Part Lot 1 DP 28205. Dry Creek comprises a U-shaped parcel of land approximately 7.94 ha in area (Figure 5).
- 5.19 Dry Creek Part Lot 1 DP 28205 (Record of title WNF2/1438) is subject to:
- ROW 701267, which favours Part Section 200 Hutt District (the recreation reserve land) owned by the Crown and is used for the Dry Creek loop track. The ROW is

shown by Area A on the Adamson Shaw Ltd plans. This right-of-way easement will become redundant once the identified areas of Part Lot 1, DP 28205, are designated as a recreation reserve, as both pieces of land will be in Crown ownership. Discussions with DOC have confirmed this ROW can remain post exchange

- Gazette Notice taking part (1203 m²) of the within land to the front of the Dry Creek site (shown in the Adamson Shaw Ltd report) for roading purposes. The road adjacent to the Dry Creek site is within the TNZ⁴ New Zealand Transport Agency (NZTA) Waka Kotahi designation.

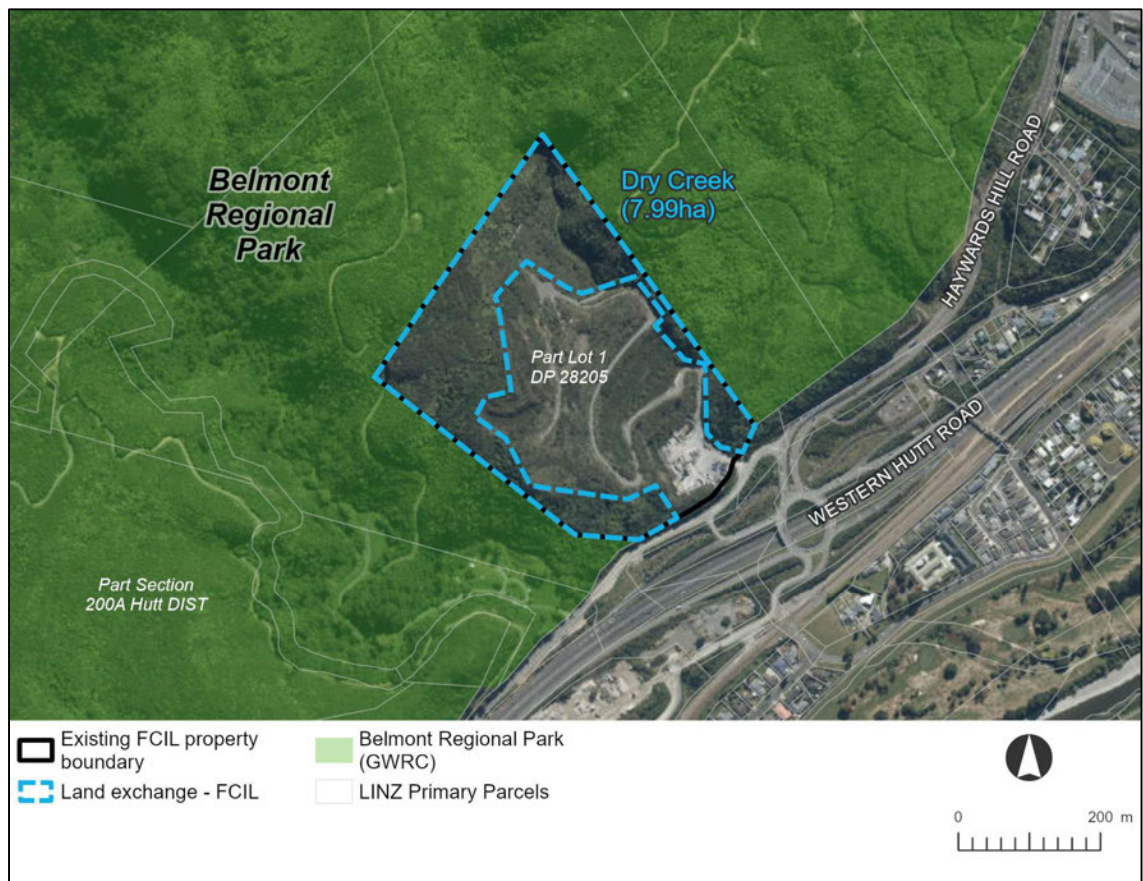


Figure 5: Dry Creek Block (outlined in blue) for land exchange.

⁴ Term refers to a specific designation held by the NZ Transport Agency Waka Kotahi for a portion of the state highway network in the Hutt City Council area.

Table 8: Features and values of the Dry Creek Block.

Overview of Key Features and Values	
Values	Description of key features
Ecology	A small area in the northern corner of the Dry Creek block contains historic fill with a mix of exotic and native regenerating vegetation. The balance of the block comprises late seral broadleaf forest.
Landscape	This parcel sits on the outer slopes of the Dry Creek catchment and contains regenerating broadleaf forest and scrub across a series of gullies and slopes. Ecological, landscape and geotechnical considerations led to the exclusion of the middle section of Dry Creek. The amended footprint forms a continuous block of regenerating native cover that connects to the surrounding park. It surrounds a retired clean fill face and primarily includes areas that were not subject to quarrying or clean fill activities. Slopes in the exchange area range from moderate to very steep, including former batter slopes.
Recreation	Recreation value of the Winstone land (DOC-Get) is confined to approximately 33 m of the Dry Creek Loop Track on the Dry Creek exchange block.
Mana Whenua	Reflects the principles of whakapapa and Ki Uta Ki Tai through its role in the wider catchment system. Its regenerating native cover provides continuity between the parcel and the adjoining parkland.
Archaeology	Dry Creek has no known archaeological value.
Geotechnical	Based on the report undertaken by Baseline Geotechnical Ltd (2025), slope stability hazard in this proposed land exchange parcel is limited to very localised areas of old access roads, and the risk to persons and conservation values is negligible.
Land Contamination	Pattle Delamore Partners Ltd were engaged to undertake a PSI and a Detailed Site Investigation of a portion of Dry Creek in support of the land exchange with DOC. Dry Creek was physically worked until clean fill placement concluded in 2019. The site is then revegetated and has remained so to the present day. Analytical results were generally comparable across the site with no exceedances against the applicable criteria. Low-level detections of selected polycyclic aromatic hydrocarbons may be consistent with observations of asphalt within the fill material. No asbestos was identified in the analysed samples. The limited site investigation work undertaken did not identify the presence of material beyond that allowed for in the CMP.
Hydrology	The catchment upstream of the exchange area is also small, adding only 4.1ha. This, however, means that the exchange area is largely 'self-contained' and includes most of the area up to the interfluvial or catchment divide meaning that it's simpler to manage. The area to be exchanged comprises the upper catchment and gully heads that surround the now closed Dry Creek Quarry (see Figure 2.7 of

	Landscape Dynamics (2025)). As such, these watercourses were largely unaffected by activities associated with historic quarrying.
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DOC-Get: QEII Areas and other covenanted areas/interests (Sch 6, Sec 23(1))

- 5.20 Parts of the Northern Gully and Firth Block are subject to QEII covenants. This section outlines the QEII open space covenants that apply to those parts of the land. These covenants were registered to protect identified areas of open space, ecological, and landscape value in perpetuity. The following paragraphs describe the relevant covenant areas, their extent, and the key provisions that guide management.
- 5.21 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 of the covenant is to protect and maintain the natural character of the covenant area. A copy of Covenant 10476608.1 is provided at **Appendix E3**.
- 5.22 The Open Space Covenant was registered in 2016 between Fletcher and the QEII National Trust, protecting approximately 12.4774 hectares of land adjacent to the Belmont Quarry operation.
- 5.23 The covenant applies to three mapped areas (Areas A, B, C) within DP 494230. The land is held in freehold by Fletcher and is legally protected to preserve its open space, ecological, and landscape values in perpetuity. The covenant restricts the use, development, and modification of the land except as permitted under its terms. The area of each QEII Block is set out as follows:
- Northern Gully QEII: 2.87 ha.
 - Firth Block QEII: 9.61 ha.
- 5.24 The existing covenant areas (shown as C, D and E on the AdamsonShaw plans) are located within land that will be vested with the crown as reserve land (shown light green on the AdamsonShaw plans). QEII Covenants are permanent and cannot be removed except in very specific circumstances. It is considered that there is no need in this case to remove or vary the QEII covenant.
- 5.25 Consultation with the QEII National Trust has occurred before this application was made. A copy of the letter from the QEII National Trust to Winstone is provided at **Appendix D9**.
- 5.26 DOC has confirmed that no changes to the QEII Covenant are needed to facilitate the land exchange.



Figure 3: Areas subject to Open Space Covenant 10476608.1.

- 5.27 The effect of the QEII covenant is that nothing may be done in the covenanted areas that materially alters the appearance or condition of the covenant areas or is prejudicial to them as an area of open space. Activities such as removing native trees, planting non-native trees, and constructing buildings may not be undertaken without the consent of the QEII National Trust. The QEII National Trust is entitled to access the covenant area for the purposes of viewing its state and condition and ascertaining compliance with the covenant.
- 5.28 There is no right to public access under the covenant, although temporary or controlled entry may be allowed with the consent of the landowner after giving due consideration to any specific management issues relating to the covenant area and ensuring that regard is had to the purpose and objectives of the covenant deed. The land is managed in accordance with an agreed management plan that supports ecological restoration and visual buffering between quarry operations and surrounding landscapes.
- 5.29 The covenant requires Winstone to notify the QEII National Trust of the proposed land exchange and provide the QEII National Trust with the name and contact details of the new owner. Winstone has advised the QEII National Trust informally about the proposed land exchange and will provide formal written notice in terms required by the covenant at the time the exchange is approved and implemented. The QEII National Trust's agreement is not required for a sale or disposition of the covenanted land.

- 5.30 As part of Winstone's consultation with the QEII National Trust, it has sought confirmation that the covenant would remain in place and that DOC was aware of the terms of the obligations under the covenant. DOC has been provided a copy of the covenant and has confirmed it understands the responsibilities it would have under it in the event it becomes responsible for the management of this land after an exchange. This has been communicated to the QEII National Trust.
- 5.31 Both the QEII covenants will remain in place post exchange and be unaffected by the exchange.
- 5.32 There is also an encumbrance in favour of HCC for the protection of vegetation. This is on record of title RT WN31D/969. Winstone and HCC are in the process of discharging this encumbrance, as it overlaps with the QEII covenant it is redundant.

Conclusion: DOC-Get (34 ha)

- 5.33 The following table provides a summary of the DOC-Get land parcels described in this section.

Table 8: Summary of DOC-Get land parcels.

Block name	Area (ha)	Legal description	Owner name (current)	Owner name (proposed)
Northern Gully	12.62	Lot 1 DP 60552, Lot 5 DP 322126	Fletcher	Crown
Southern Gully	3.94	Lots 4, 5 DP 322126	Fletcher	Crown
Firth Block	9.6	Pt Lot 1 DP 22561, Lot 1 DP 60552	Fletcher	Crown
Dry Creek	7.94	Pt Lot 1 DP 28205	Fletcher	Crown
TOTAL	34.110			

- 5.34 As the areas of land that are offered for exchange comprise part only of the above titles, in order to prepare the land for exchange, the applicant will be seeking subdivision consent(s) as part of its suite of approvals under the FTAA to subdivide and boundary adjust the existing titles in accordance with a draft survey plan prepared by Adamson Shaw and provide at **Appendix B10**. Any approval for the proposed exchange would be conditional on Winstone undertaking the necessary conveyancing steps to prepare the parcels for exchange.

Site Description: DOC-Give (Sch 6, Sec 23(1))

- 5.35 The following paragraphs describe the Crown land parcels that contain the DOC-Give area proposed to be exchanged, including their legal descriptions, management status, and the relationship to the Belmont Quarry operation. The proposed ODBA site is currently situated across three parcels:
- **Part Section 200A Hutt DIST** is the largest parcel and has a site area of 48 hectares. The parcel is the easternmost of the three proposed to be included in part within the proposed land exchange agreement.

- **Section 255 Hutt DIST** is located across the north-west boundary from the operational quarry area and has a total area of 21.25 ha.
- **Part Section 261 Hutt DIST** is located to the north of Section 255 and has a total area of 18.78 ha. Part Section 261 is divided into three parts by an unformed paper road, which is vested in Hutt City Council. The proposed OBDA will require the stopping of the paper road, which does not form part of this application.

5.36 Of the total area of the parcels identified above, approximately 23.24 - 23.86 ha (without and with road area included) is needed for the exchange:

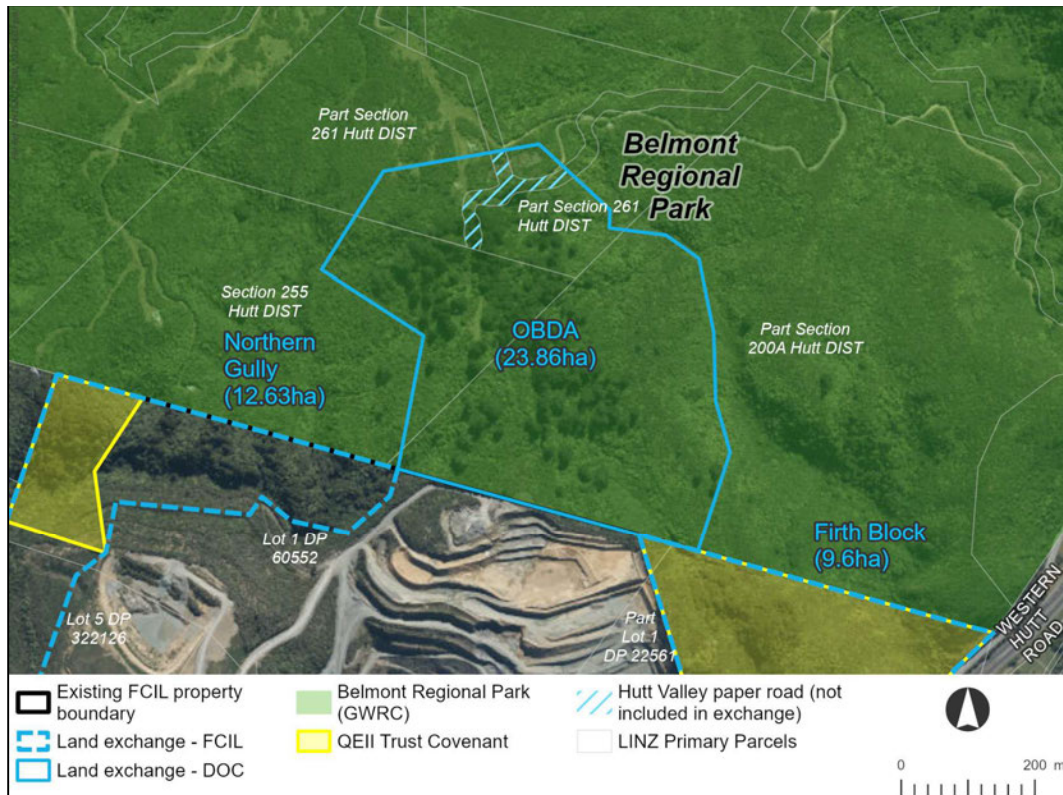


Figure 4: Crown land holdings relevant to the land exchange (OBDA 23.24 ha).

DOC-Give: Proposed OBDA (Sch 6, Sec 23(1))

Introduction

5.37 The proposed DOC-Give Land is located immediately to the north of Belmont Quarry within Crown Land administered by GWRC under the Belmont Regional Park. It is situated within the Dry Creek area of the Belmont Regional Park. The DOC-Give Land 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).

- 5.38 The land that now forms the proposed exchange 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). These recreation reserve parcels are collectively referred to in this report as the DOC-Give areas. On 24 May 1991, the GWRC 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, pp 1765). However, the underlying freehold interest in the land remains vested in the Crown.
- 5.39 DOC must consult with a statutory manager of the reserve in preparing its report where the land proposed to be exchanged is a Crown-owned Reserve managed by someone other than DOC (sch 6, cl 26(3)). In this case, that means DOC must consult with GWRC.
- 5.40 This land is currently classified as a recreation reserve and is subject to the provisions of the Reserves Act 1977, including the Toitū Te Whenua Parks Network Plan 2020-2030, a management plan prepared by GWRC under the Reserves Act 1977.
- 5.41 The DOC-Give land areas are zoned as a General Recreation Activity Area within the HCC Operative District Plan and as a Natural Open Space Zone within the Proposed Lower Hutt District Plan 2025.

Table 9: Features and values of the DOC-Give area.

Overview of Key Features and Values	
Values	Description of key features
Ecology	The DOC-Give area falls within the Belmont-Dry Creek Key Native Ecosystem (KNE) identified in the GWRC's 2023-2028 operational plan. Its landscape values are recognised in the Toitū Te Whenua Parks Network Plan 2020-2030. The site is predominantly covered by regenerating native broadleaf forest that increases in age downslope from the spur, reflecting historic farming concentrated on the ridgeline and gentler slopes. Detailed vegetation information is provided in the BlueGreen Ecology Limited (2025) ecological assessment in Appendix B1 .
Landscape	The proposed ODBA site is located on a gently sloping spur that falls from a maximum height of approximately 210 metres above mean sea level (AMSL) at its northernmost extent to approximately 203 metres AMSL where the spur meets the northern boundary of the operational quarry area. The site falls to a minimum elevation of approximately 152 metres AMSL at its south-western corner and rises again to around 164 metres AMSL at the south-eastern corner. The ODBA exchange area can be broadly separated into its western and eastern halves, each containing a series of gullies that form the headwaters of minor tributaries of the Te Awa Kairangi / Hutt River. The stream draining the western half is larger than the eastern side and is known by mana whenua as Waikoropupū. There is no direct surface connection between the Waikoropupū stream and the Te Awa Kairangi / Hutt River, as the stream is piped underground where it enters the operational quarry area.

	The western gullies are more steeply incised than those on the eastern side, where water flows intermittently across exposed greywacke bedrock. The eastern network is broader and flatter, containing multiple shallow flow channels and a small body of standing water in the south-eastern corner, likely a remnant farm dam. The flatter gradient supports seepage-type wetlands where soft alluvial soils impede groundwater movement.
Recreation	Greenaway & Associates (2025) notes the main recreation feature of the Regional Park land to be exchanged (DOC-Give) is a 400m section of 4WD power pylon access track (also called the utility track) which bifurcates from and parallels 240m of the Buchanan Road Tramping Track. The utility track recorded an estimated 6,570 annual users compared with 414,100 at Cornish Street. The utility track is not maintained as a stand-alone experience, adds only a very minor alternative route, is not marked as the Track route, and its recreation value is considered low. In addition, Greenaway & Associates (2025) notes at the Regional Park scale the loss of the utility track is immaterial, with no effect on the ability to use the Buchanan Road Tramping Track, access to Boulder Hill or the Puke Ariki / Haywards Korokoro Traverse. If the exchange is approved, Winstone's main access to the OBDA new exchange area will be via the internal haul road from the quarry; it will not use any park tracks.
Hydrology	As part of the DOC-Give land, the OBDA is designed to be located on a ridge, which is drained by five small headwaters. The gullies on the west side of DOC-Give are unlikely to support perennial flow. These west-side gullies drain into the northern tributary described above in Northern Gully. The gullies that drain to the east, discharge into streams that drain a small catchment eroded into the fault scarp to north of Belmont Quarry and Waikoropupu Stream. This stream discharges into the Hutt River. The lower reaches of this stream have relatively high Strahler orders because of the large number of small gullies that form the upper catchment. Figure 2.4 of Landscape Dynamics (2025) illustrates the catchments surrounding the OBDA as part of DOC-Give land.
Mana whenua	Cultural values associated with the site have been acknowledged through engagement with mana whenua, including Taranaki Whānui Ki Te Upoko O Te Ika and Ngāti Toa Rangatira. Two relevant Treaty Settlement deeds apply, and a process of ongoing engagement is underway to ensure cultural interests are woven into design and respected. Further details regarding the cultural values associated with the OBDA exchange area are provided in the cultural values assessment report contained in Appendix B7.
Archaeology	No recorded archaeological sites are identified within the project footprint, although known sites exist elsewhere in the wider regional park. Based on current records and past land use, the likelihood of unrecorded sites within the proposed OBDA area is low.
The National Grid and FirstGas Pipeline	The National Grid traverses both the upper quarry area and the northernmost extent of the proposed OBDA exchange area, specifically the span between towers HAY-MLG-B0008 and HAY-MLG-B0009. There is no designation or easement in place for this infrastructure, but Transpower has rights of entry to inspect, maintain and operate its electricity infrastructure under sections 22–23F of the Electricity Act

	1992. The Transpower infrastructure imposes a need for consultation and engineering precautions. A FirstGas pipeline is also present in the wider Belmont Regional Park area, but it is more than 2 kilometres away from the proposed OBDA and unaffected by the proposed exchange.
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Conclusion: DOC-Give (23.86 ha)

5.42 In summary, the DOC-Get Land Parcels, which are set out above as summarised in the following table:

Table 10: Summary of DOC-Give land parcels.

Block name	Area (ha)	Legal description	Owner name (current)	Owner name (proposed)
Proposed Overburden Disposal Area	23.86	Pt Sec 200A Hutt Dist. Sec 255 Hutt Dist. Pt Sec 261 Hutt Dist.	Crown	Fletcher

5.43 As the areas of land proposed as the DOC-Get areas comprise part only part of the allotments, Winstone will be seeking all necessary subdivision consent(s) as part of its suite of approvals under the FTAA to subdivide and boundary adjust the existing titles in accordance with a survey plan prepared by Adamson Shaw in preparation for the exchange. Any approval for the proposed land exchange is proposed to be conditional on the necessary subdivision being granted and the survey plan being approved by the territorial authority and deposited by the Registrar-General of Land.

Site Description: Conclusion

5.44 The proposed land exchange involves five parcels of land. One parcel (comprising parts of three allotments) is owned by the Crown and referred to as the DOC-Give area. Four parcels owned by Fletcher are collectively referred to as the DOC-Get areas: Northern Gully, Southern Gully, Firth Block, and Dry Creek.

5.45 The DOC-Give land comprises part of Belmont Regional Park and is currently held as a recreation reserve under the Reserves Act 1977.

5.46 The DOC-Get land is held in freehold ownership by Fletcher and includes areas protected under QEII open space covenants.

5.47 In total, the DOC-Get land proposed for exchange covers approximately 30.16 hectares, and the DOC-Give land covers approximately 23.86 hectares.

5.48 Together, these parcels establish the physical and planning context for the proposed exchange. The following sections assess the conservation values of each area and evaluate the effects and benefits of the exchange in accordance with clause 24(a) of Schedule 6 to the FTAA.

6.0 Proposal [s 13(4)(a),(d), Sch 6 Sec 23]

Overview of the project (s13(4)(a))

- 6.1 The Belmont Quarry project proposes the establishment of a new OBDA to the north of the existing quarry footprint. This development is essential to maintain long-term access to high-quality aggregate resources for the Wellington Region.
- 6.2 This report is limited to the proposed land exchange between the Crown and Winstone (Fletchers). Approvals for the use of DOC-Give land as an OBDA will be addressed through a subsequent substantive application under section 42 of the FTAA.

Parameters of Land Exchange

- 6.3 The proposed land parcel areas and attributes are set out in Table 1, which provides a summary of the proposed exchange.
- 6.4 The land exchange is a necessary precondition to enable the physical works, which will be addressed in a substantive application under section 42 of the FTAA.

Table 11: Summary of all land parcels subject to the proposed exchange.

Crown Land (DOC-Give)		Fletcher Concrete and Infrastructure Land (DOC-Get)		
23.86 ha	The proposed OBDA Area is currently within Belmont Regional Park	7.94 ha	Dry Creek	Lot 1 Deposited Plan 28205 held in Title WNF2/1438
		9.6 ha	Firth Block QEII	Part Lot 1 Deposited Plan 22561 held in Title WN31D/969
		12.62 ha	Northern Gully (including approximately 2.9 ha QEII Covenant Open Space Covenant 10476608.1).	Lot 1 Deposited Plan 60552 held in Title WN31B/39
		3.94 ha	Southern Gully	Lots 4, 5 DP 322126
Total Land Area: 23.86 ha		Total Land Area: 34.1 ha		

Figure 5: Land exchange parcels.

Map of the project area and land to be exchanged [s 13(4)(d)]

- 6.5 This subsection provides an overview and map of the project area and the land parcels proposed for exchange between Winstone (Fletcher) and the Crown.⁵ It identifies the spatial relationships among the existing Belmont Quarry footprint, the proposed OBDA, and the land to be transferred as part of the exchange. Figure 8 illustrates these components and their locations relative to Belmont Regional Park and adjoining landholdings.

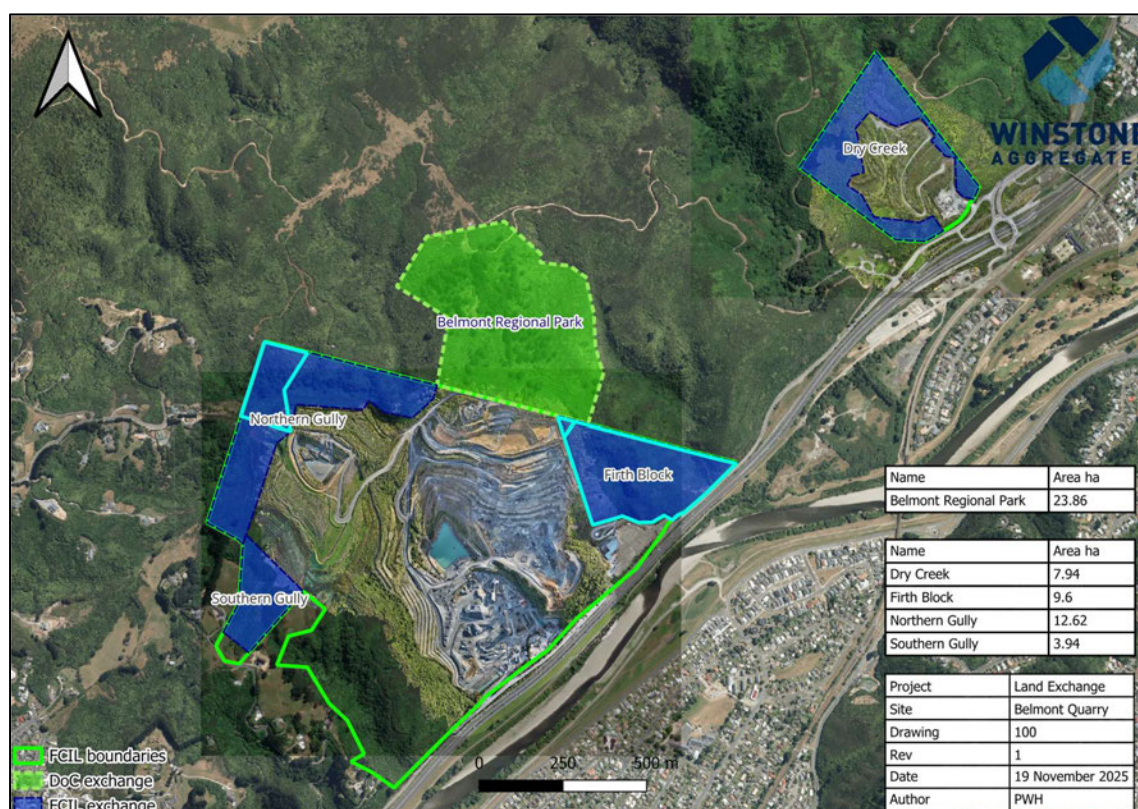


Figure 8: Site plan showing all land blocks subject to the proposed exchange.

Timing and staging [s 13(4)(e), s13(4)(f)(i)]

- 6.6 The first step in the Project, if approved, will be the implementation of subdivision consents to isolate the land parcels for exchange, followed by a conveyancing process to exchange the legal ownership of the parcels between the Crown and Fletcher.
- 6.7 As the areas of land that are offered for exchange comprise part only of the above titles, the applicant will be seeking any necessary subdivision consent(s) as part of its suite of approvals under the FTAA to subdivide the existing titles in accordance with the draft scheme plan prepared by AdamsonShaw and undertake the necessary conveyancing steps to prepare the land for exchange.

- 6.8 Winstone will also seek all the necessary approvals (RMA, Wildlife permits, archaeology approvals it requires for its project as part of its substantive fast track application.
- 6.9 Once the consents have been obtained and land exchange has been implemented, Winstone will then begin the process of developing the OBDA in accordance with resource consents and other conditions that are being sought under the substantive application that will be lodged under the FTAA.
- 6.10 While the steps required to implement the Project will naturally need to occur in a logical and project-managed sequence, Winstone does not seek for the Project to proceed in stages in the sense described in section 13(4)(f) of the FTAA. Unlike other listed projects, this Project has not been described in Schedule 2 to the FTAA as being undertaken in a staged approach.

Other approvals needed

- 6.11 Independent of the FTAA process, Winstone is working towards other approvals including but not limited to:

- Overseas Investment Office (OIO) approval, and
- stopping of unformed legal road (HCC is the road controlling authority)

These matters, listed above, are not addressed in the FTAA process but rather are referenced here for completeness.

- 6.12 As part of the FTAA process, the following forms of consent are being sought, subject to this proposed exchange of reserve land.

- Wildlife Act permit(s).
- Archaeological Authorities.
- Resource consents per sections 9, 11, 13, 14, 15 of the RMA, as set out below.

Table 12: Relevant regulations and rules.

Instrument	Reference	Descriptor
Resource Management (National Environmental Standards for Freshwater) Regulations 2020	Regulation 38	Restoration, wetland maintenance, and biosecurity of natural inland wetlands (permitted)
	Regulation 39	Restoration, wetland maintenance, and biosecurity of natural inland wetlands (RDA)
	Regulation 42	Construction of wetland utility structures (RDA)
	Regulation 43	Maintenance of wetland utility structures (permitted)
	Regulation 44	Maintenance of wetland utility structures (RDA)
	Regulation 45A	Quarrying activities (discretionary)
	Regulation 45B	Cleanfill areas (discretionary)

Instrument	Reference	Descriptor
	Regulation 45D	Extraction of minerals (discretionary)
	Regulation 52	Drainage of a natural inland wetland (non-complying)
	Regulation 53	Drainage of natural inland wetland (prohibited)
	Regulation 54	Other activities (non-complying)
	Regulation 57	Reclamation of rivers (discretionary)
	Regulation 70	Culverts (permitted)
	Regulation 71	Culverts (discretionary)
Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011	Regulation 8	Soil disturbance (permitted)
	Regulation 9	Soil disturbance (controlled)
	Regulation 10	Soil disturbance (RDA)
	Regulation 11	Soil disturbance (discretionary)
Resource Management (National Environmental Standards for Air Quality) Regulations 2004	Regulation 17	Resource consents for discharges of PM ₁₀
	Regulation 20	Resource consents for the discharge of carbon monoxide, oxides of nitrogen, and volatile organic compounds
	Regulation 21	Resource consents for the discharge of sulphur dioxide
Greater Wellington Regional Council (GWRC) Natural Resources Plan (operative)	Rule 27	Discharge of contaminants into the air from the handling of bulk solid materials, including from the activities of quarrying, mining, cleanfilling, blasting, extraction, crushing, screening, processing, stockpiling, handling, conveying, sorting, and storage. (permitted)
	Rule 80	Discharge of cleanfill material onto or into land, or onto or into land where a contaminant may enter water. (permitted)
	Rule 94	All other discharges (discretionary activity).
	Rule 101	Use of land, and the associated discharge of sediment into water or onto or into land where it may enter water from earthworks up to a total area of 3,000 m ² per property per 12-month period. (permitted)
	Rule 107	Earthworks and vegetation clearance (discretionary).
	Rule 118	Activities in natural wetlands (non-complying).
	Rule 143	Reclamation of the bed of a river or lake outside of a site identified in Schedule A1 (outstanding rivers), Schedule A2 (outstanding lakes) or Schedule C (mana whenua) – discretionary.
	Rule 151	Damming and diverting water (discretionary)
	WH.R13	Stormwater from a new impervious surfaces associated with unplanned Greenfield Development.
	WH.R23	Earthworks (permitted)

Instrument	Reference	Descriptor
GWRC- NRP Plan Change 1. ⁶	WH.R24	Winter works (RDA)
	WH.R25	Earthworks (including winter works). (non-complying).
City of Lower Hutt District Plan (Operative)	Rule 7A 2.2 (c)	Buildings and structures in the Belmont Regional Park (RDA).
	Rule 7A 2.3	Activities not listed as Permitted or Restricted Discretionary Activities are Discretionary Activities under Rule 7A 2.3.
	Rule 11.2.4	Subdivision in the General Recreation Activity Area (Discretionary).
	Rule 14A 5.1	Internal roads not meeting NZS 4404:2010 Land Development and Subdivision Infrastructure (RDA).
	Rule 14B 2.4	Free-standing signage exceeding 3m in height, or exceeding 3 m ² in area (Discretionary).
	Rule 14C 2.2	Noise emissions (discretionary) No permitted noise levels are listed for the General Recreation Activity Area.
	Rule 14E 2.2	Any activity or site development in the Significant Natural Resources area (RDA)
	Rule 7A 2.2 (c)	Buildings and structures in the Belmont Regional Park (RDA)
	Rule 7A 2.3	Activities not listed as Permitted or Restricted Discretionary Activities are Discretionary Activities under Rule 7A 2.3.
	Rule 11.2.4	Subdivision in the General Recreation Activity Area (Discretionary)
	Rule 14A 5.1	Internal roads not meeting NZS 4404:2010 Land Development and Subdivision Infrastructure (RDA)
	Rule 14B 2.4	Free-standing signage exceeding 3m in height, or exceeding 3m ² in area (Discretionary).
	Rule 14C 2.2	Noise emissions (discretionary) No permitted noise levels are listed for the General Recreation Activity Area.
	Rule 14E 2.2	Any activity or site development in the Significant Natural Resources area (RDA)
	Rule 14i 2.1.a	Earthworks in all activity areas (permitted)
	Rule 14i 2.2.A	Earthworks in all activity areas that fail to comply with any of the PA Conditions (RDA)
Proposed Lower Hutt District Plan 2025. ⁷	NOSZ-R3.1	New structures in the Natural Open Space Zone (permitted)

⁶ Council intends to initiate a Variation to Plan Change 1; subject to the Resource Management (Consenting and Other System Changes) Amendment Bill

⁷ Subject to the Resource Management (Consenting and Other System Changes) Amendment Act 2025.

Instrument	Reference	Descriptor
	NOSZ-R14.4.4	Carparking area in the NOSZ not associated with conservation or recreational activities (NCA)
	NOSZ-R15	Activities not provided for in the NOSZ (NCA)
	NOSZ-R16.2	Outdoor storage and work areas for materials not associated with park maintenance or repair, or not screened and visible to the public (RDA)
	NOSZ-R17.2	Servicing outside of 7:00 A.M. and 10:00 P.M. (RDA)
	TR-R1.2	Non-compliances with roading design standards (RDA)
	ECO-R1	Exotic vegetation removal (permitted)
	ECO-R2	Indigenous vegetation removal (RDA)
	SUB-R4	Subdivision that creates a vacant allotment (status dependent on compliance with standards)
	EW-R2	General earthworks not meeting maximum standards (RDA)
	LIGHT-R1.2	Artificial light not meeting permitted standards (RDA)
	NOISE-R1.2	Noise emissions not provided for (RDA)
	NOISE-R2.2	Construction noise not provided for (RDA)
	NOISE-R5.2	Vibration not provided for (RDA)
	SIGNS-R1.2	Signs not provided for (RDA)
	NOSZ-R3.1	New structures in the Natural Open Space Zone (permitted)
	NOSZ-R14.4.4	Carparking area in the NOSZ not associated with conservation or recreational activities (NCA)
	NOSZ-R15	Activities not provided for in the NOSZ (NCA)
	NOSZ-R16.2	Outdoor storage and work areas for materials not associated with park maintenance or repair, or not screened and visible to the public (RDA)
	NOSZ-R17.2	Servicing outside of 7:00 A.M. and 10:00 P.M. (RDA)
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	EW-R2	General earthworks not meeting maximum standards (RDA)
	LIGHT-R1.2	Artificial light not meeting permitted standards (RDA)

Instrument	Reference	Descriptor
	NOISE-R1.2	Noise emissions not provided for (RDA)
	NOISE-R2.2	Construction noise not provided for (RDA)
	NOISE-R5.2	Vibration not provided for (RDA)
	SIGNS-R1.2	Signs not provided for (RDA)

- 6.13 These consents are not sought as part of this land exchange application and will be sought in the substantive application to the fast-track panel in due course.

7.0 Persons and interests affected, treaty settlements and owners and occupiers (s 11, 13(4)(l),32, Sec 24(f)).

Overview

- 7.1 The Belmont Quarry is situated in the Western Hills of the Hutt Valley, within the jurisdiction of HCC. The surrounding area comprises a diverse mix of land uses, including rural residential properties, public open space, infrastructure corridors, and regional transport links. The area sits within the rohe of Taranaki Whānui ki Te Upoko o Te Ika and Ngāti Toa Rangatira.
- 7.2 This section sets out the persons who may be affected by the land exchange or who hold legal interests in the exchange land or adjacent land, as well as the principles and provisions of Treaty settlements that relate to the project area. This identification is required by ss 11, 29, 13(4)(j) and 13(4)(l) of the FTAA, and informs the extent of consultation undertaken pursuant to s 11 and opportunity for comments under ss 35(1) and 53 and sch 6, cl 25. The consultation undertaken by the applicant is described later in Section 8 of this report, which sets out the outcomes from consultation and details of agreements or arrangements entered into with affected persons and holders of legal interests.

Exchange parcels — owners and occupiers

- 7.3 The occupiers of the Belmont Quarry land are Winstone (the applicant) and Holcim (New Zealand) Ltd (occupier/tenant at Dry Creek), Fulton Hogan, and Firth Concrete (FCIL) (tenants/occupiers at Belmont Quarry). The tenants' operations will not be impacted by the proposed exchange as they sit outside of the land to be exchanged. Tenants' use of the site will remain unaffected by the land exchange.
- 7.4 The land to be exchange with Winstone is owned by the Crown (Department of Conservation) and administered by GWRC.

Adjacent land — owners and occupiers

- 7.5 To the west, the Belmont Quarry borders rural-residential properties along Liverton Road and Kaitangata Crescent. These properties are generally low-density lifestyle blocks, buffered from quarry operations by topography and intervening vegetation. To the east, the Belmont Quarry is bounded by Hebden Crescent and State Highway 2, the latter of which provides strategic road access to the wider Wellington Region. On the other side of the highway lies Te Awa Kairangi / Hutt River and suburban areas of Lower Hutt, including Pomare and Taitā. The location is well-connected by road and rail, and its location and connections play a key role in regional aggregate movement.
- 7.6 The owners of the lifestyle blocks that are adjacent to the exchange parcels are identified in the following table. There are 11 private residential lots and a scenic reserve. Eight of these lots are accessed via Liverton Road, while the remaining four

are accessed via the top end of Kaitangata Crescent. These adjacent lots have been identified using the EPA's guidance on identifying adjacent land.⁸

Table 13: Details of adjoining landowners.

Address	Legal description	Record of title	Area (hectares more or less)	Name
87B Kaitangata Crescent, Kelson, Lower Hutt	Lot 23 DP 89316	WN57A/77	3.9715	[REDACTED]
87A Kaitangata Crescent	Lot 24 DP 89316	WN57A/78	2.4715	[REDACTED]
89 Kaitangata Crescent	Lot 22 Deposited Plan 88394	WN55D/466	2.3250	[REDACTED]
180 Kaitangata Crescent	Lot 21 Deposited Plan 88394	WN55D/465	2.5235	[REDACTED]
160 Kaitangata Crescent	Lot 20 Deposited Plan 88394	WN55D/464	2.0588	[REDACTED] (not directly adjacent but a short distance from the boundary of the DOC-Get).
104 Kaitangata Crescent	Lot 15 Deposited Plan 83679	WN50D/485	2.4370	DAC Trustees 2020 Limited, [REDACTED]
200 Liverton Road	Lot 1 Deposited Plan 79918	WN46D/225	4.049	[REDACTED]
198 Liverton Road	Lot 1 Deposited Plan 23363	WN6A/739	2.0326	[REDACTED]
184 Liverton Road, Kelson	Lot 2 Deposited Plan 23363	WN19A/707	2.0710	[REDACTED]
174 Liverton Road	Lot 3 Deposited Plan 23363	WN19A/708	2.1843	[REDACTED] (adjacent to Fletcher land but not the parcels to be exchanged).
148 Liverton Road	Lot 4 Deposited Plan 23363	WND3/1055	2.6229	[REDACTED] (adjacent to Fletcher land but not the parcels to be exchanged).

⁸ Environmental Protection Authority "Identifying adjacent land", available [here](#).

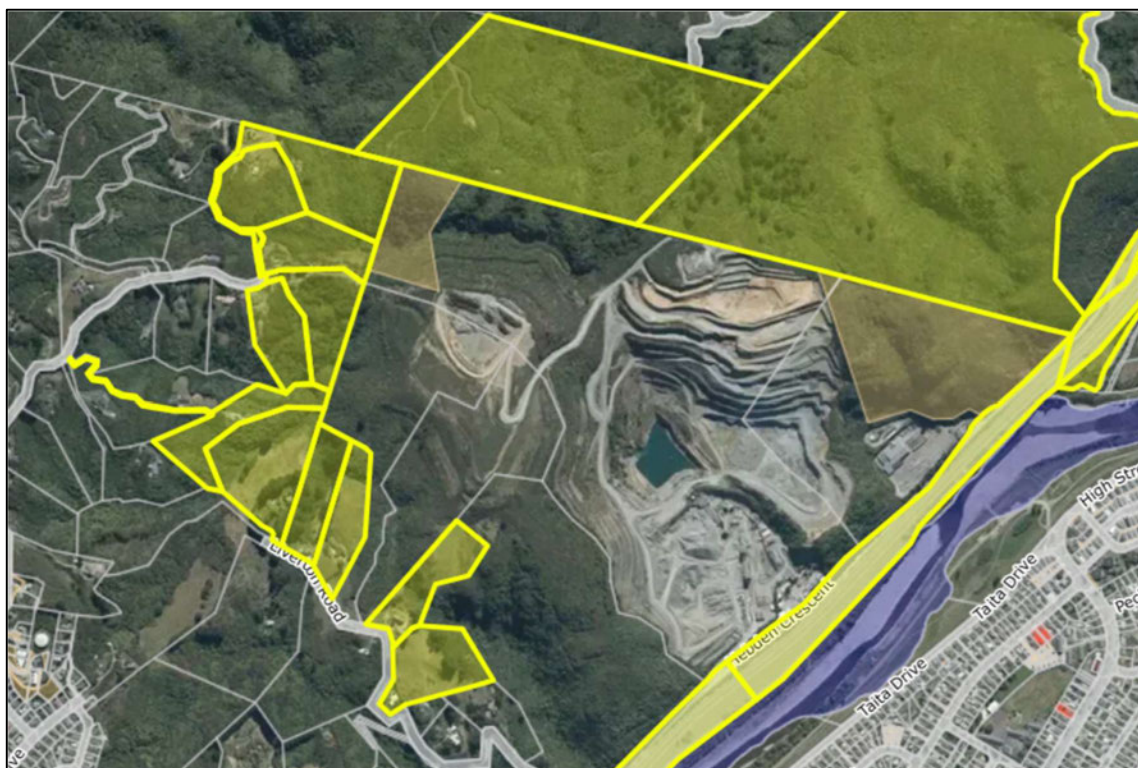


Figure 9: Liverton Road and Kaitangata Crescent properties to the south-west, west, and north-west of the Quarry Area.

- 7.7 In terms of other parcels of land adjacent to the project area, the northern and eastern boundaries of the Belmont Quarry adjoin Belmont Regional Park. The Regional Park land is owned by the Crown and administered by GWRC.
- 7.8 Belmont Quarry is traversed or neighboured by strategic infrastructure, including Transpower's National Grid transmission lines. These constraints have been considered in the proposed land exchange boundaries.
- 7.9 There are local and Government roads adjacent to the exchange areas, which are vested in Hutt City Council and the Crown respectively. The Government Road (State Highway 2) is administered by New Zealand Transport Agency (Waka Kotahi).⁹ The applicant considers that these roading authorities are potentially affected.
- 7.10 If this Land Exchange proposal is approved, then the OBDA Exchange area required by Winstone will be bound on three sides (north, west and east) by the Belmont Regional Park and on the south by Fletcher/Winstone land. The DOC-get areas will be surrounded by Fletcher/Winstone land, the rural-residential properties set out in paragraph 7.6 and local and Government roads.

⁹ Government roads such as state highways are vested in the Crown by section 44 of the Government Rounding Powers Act 1989; local roads are vested in local authorities by section 316 of the Local Government Act 1974.

Treaty settlements (s13(4)(l)) and relevant mana whenua groups

- 7.11 This subsection addresses the requirement under section 13(4)(l) of the FTAA to identify any applicable Treaty settlements and summarise relevant principles or provisions that relate to the proposed land exchange. It also identifies the relevant iwi authorities and other mana whenua groups that are within the scope of s 13(4)(j)(ii)–(vii) of the FTAA.
- 7.12 The land exchange area sits within the rohe of Taranaki Whānui ki Te Upoko o Te Ika and Ngāti Toa Rangatira, both of whom have settled historical claims with the Crown. While the parcels involved in the exchange are not subject to Right of First Refusal (RFR) under either settlement, both iwi have a recognised interest in the governance and management of Belmont Regional Park. Engagement with both iwi has been integral to refining the land exchange proposal.

Taranaki Whānui ki Te Upoko o Te Ika

- 7.13 The Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009 provides redress for historical breaches of the Treaty of Waitangi across the wider Wellington region. It acknowledges the deep cultural connection Taranaki Whānui holds with the Hutt Valley and associated landscapes.
- 7.14 Relevant provisions include:
- A 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.
 - The Right of First Refusal (RFR) regime is provided for under Part 3, Subpart 5 of the Settlement Act. The definition of RFR land is found in section 92, with disposal restrictions in sections 93-94, and exemptions in section 105(a), which excludes exchanges under section 15 of the Reserves Act 1977.
 - The RFR Land Schedule is included in the Deed of Settlement as a separate annex and does not include the Belmont Regional Park parcels proposed for exchange.
- 7.15 Taranaki Whānui is a mana whenua partner to the Toitū Te Whenua Parks Network Plan 2020-2030, which identifies iwi participation in land disposal and exchange processes under Policy 52P and broader involvement under Policy 57P.
- 7.16 Winstone has engaged with Taranaki Whānui as part of the land exchange proposal and continues to work alongside the iwi as implementation steps are progressed.

Ngāti Toa Rangatira

- 7.17 The Ngāti Toa Rangatira Claims Settlement Act 2014 provides redress for historical Treaty breaches and recognises Ngāti Toa's enduring relationship with the Hutt Valley and wider Wellington region.

Key provisions relevant to this proposal include:

- The Cultural Redress Protocol with the Department of Conservation is recorded in the Deed of Settlement, Cultural Redress Schedule, and acknowledged in section 27 of the Act.
- The Right of First Refusal (RFR) regime is provided for in Part 6, Subpart 3 of the Act. The definition of RFR land is in section 183, and disposal restrictions are in section 185. Section 198(a) confirms that RFR does not apply to exchanges carried out under section 15 of the Reserves Act 1977.
- The RFR Schedules (including General RFR Land) are contained in the Deed of Settlement Attachments: Part 4 and do not list the parcels proposed for exchange.

7.18 Ngāti Toa is also a mana whenua partner under the Toitū Te Whenua Parks Network Plan 2020-2030, referenced in Policy 57P, which supports mana whenua involvement in planning, tikanga-based decision-making, and the protection of cultural values.

7.19 Winstone has engaged with Ngāti Toa Rangatira during the development of the proposal and will continue to support their involvement through subsequent phases of the land exchange process.

Other mana whenua groups

7.20 The other iwi authorities that the applicant has identified as relevant to the application are Te Āti Awa, Muaūpoko, and Rangitāne o Wairarapa and Rangitāne o Tāmaki nui-ā-Rua. The consultation that has been undertaken with these groups is described in a subsequent section of this report.

Holders of legal interests in the exchange parcels

7.21 Other than the owners and occupiers identified in paragraph 7.3 above, there are a number of parties with legal interests of various descriptions in the exchange parcels.

7.22 In the DOC-Give areas:

- GWRC is the administering body for the reserve appointed under the Reserves Act 1977;
- GWRC is also a requiring authority that has issued a notice of requirement over the reserve including the exchange area under s 176 of the Resource Management Act 1991. The purpose of the designation is to allow GWRC to better manage the regional park, and it forms part of the proposed Lower Hutt District Plan. Hearings on that proposed plan have been paused by recent amendments to the RMA. Winstone has reached agreement with GWRC that will mean that the designation has no practical significance to the proposed land exchange. Details of this agreement are set out in the consultation section of this report.
- There are various license and concession holders that operate within Belmont Regional Park, but none in the DOC-Give area.

7.23 In the DOC-Get areas, a number of legal interests are noted on the titles.

- 7.24 The Northern Gully and Firth Block areas are subject to QEII covenants, in favour of Queen Elizabeth The Second National Trust.
- 7.25 The Firth Block is subject to an encumbrance in favour of Hutt City Council to protect vegetation, as noted earlier HCC has agreed to the discharge of the encumbrance and this is in the process of being discharged at the time of writing.
- 7.26 The Southern Gully includes a right of way for telecommunications and electricity. This right of way is of no practical significance because both the benefitted and burdened land parcels are currently owned by Winstone and would be transferred to the Crown under the exchange.
- 7.27 There is a right of way over part of the Dry Creek block in favour of the adjacent Crown owned land.
- 7.28 Parts of the Southern Gully and Northern Gully are subject to a quarrying effects easement in gross, in favour of Winstone.

Regional Park users

- 7.29 Belmont Regional Park is a public park with rights of access and varied user groups. In general, recreational uses of the surrounding land include walking (including with dogs outside of lambing season), cycling, nature observation, and customary harvesting. Buchanan Road is an unformed paper road that crosses the northernmost extent of the exchange area. Buchanan Road connects the Dry Creek area of the park to the Belmont Farm Hub in the central portion of the park, via Boulder Hill. These trails form part of a larger recreational network that is widely used by a diverse range of users.
- 7.30 To identify the relevant users of the regional park who may be affected by the proposed exchange, the following list has been extracted from page 103 of Toitū Te Whenua, with additional commentary in the right-hand column on whether the stakeholder is likely to be affected by the project. Feedback was provided by GWRC in its capacity as manager of the reserve about the extent to which these parties had an interest in the land, and that feedback is captured in the table below.

Table 14: Stakeholders in Belmont Regional Park, as identified in Toitū Te Whenua.

Stakeholder	Activity	Whether likely to be affected by the project
BAMBA (Belmont Area Mountain Bike Association)	Recreation	No, GWRC has advised they are not interested in the exchange area.
Belmont Pony Club (BPC)	Recreation	No, GWRC has advised they are not interested in the exchange area.
Belmont Ratepayers Improvement Association (BRIA)	Community	No, GWRC has advised they are not interested in the exchange area.

Equestrian grazing licence, Stratton Street	Recreation	No, GWRC has advised they are not interested in the exchange area.
Federated Mountain Clubs (FMC)	Recreation	Yes, as it is understood that some hikers and trampers use the Buchanan's track.
First Gas, Transpower, Wellington Electricity, North Power	Service utilities	Yes for Transpower, as it uses utility access tracks to access pylons that are in or near the land exchange areas. Transpower's position for works constructed prior to 1 January 1993 is protected by sections 22–23F of the Electricity Act 1992, which provides rights of entry to inspect, maintain and operate the works. This position will be unchanged by the land exchange. More detail is provided below from paragraph 7.35–7.37. First Gas's assets are a significant distance (over 2km) from the exchange areas, so it is not likely to be affected.
Friends of Belmont Regional Park	Conservation	Yes
Friends of Maara Roa	Conservation	No, GWRC has advised they are not interested in the exchange area.
Ngahere Korowai / Green Korowai for Porirua East	Community/conservation	No, GWRC has advised they are not interested in the exchange area.
Heritage New Zealand Pouhere Taonga (HNZPT)	Conservation	Yes
Hill Road Community Group	Community, conservation, recreation	No, GWRC has advised they are not interested in the exchange area.
Kāinga Ora Homes and Communities	Housing and community development	Yes. A letter from Kāinga Ora is provided at Appendix D14 .
Hutt City Council (HCC)	Local government	Yes
Kelson Community Association		No, GWRC has advised they are not interested in the exchange area. Kelson Community Association also confirmed it has no interest.
Korokoro Environmental Group (KEG)	Conservation	No, GWRC has advised they are not interested in the exchange area.
New Zealand Transport Agency (NZTA)	Government	Yes.
Pareraho Forest Trust	Conservation	Yes, GWRC has advised that this group is interested in the Speedy's Stream, Dry Creek and Duck Creek catchments.
Porirua City Council (PCC)	Local government	No, as the exchange areas are a significant distance away from PCC's jurisdiction.
Predator-free groups	Conservation	Yes

School neighbours: Porirua College, Maraeroa, Glenview and Corinna Schools	Education	No, GWRC has advised they are not interested in the exchange area.
Stock grazing licence holders	Commercial	No, GWRC has advised they are not interested in the exchange area.
Wesley Community Action	Community	No, GWRC has advised they are not interested in the exchange area.

- 7.31 In addition to the key stakeholders identified in the above table, there are other users of the Belmont Regional Park who are in the general public who may be affected by the land exchange proposal. The interest of these members of the public is considered to be negligible. It is not considered necessary or appropriate for comments to be invited from any member of the public who generally uses or accesses the regional park for the following reasons:
- 7.32 This would be akin to a public notification process and would tend to undermine the purpose of the Act of facilitating the delivery of infrastructure and development projects with significant regional or national benefits in a timely manner.¹⁰
- 7.33 The stakeholder groups identified in the preceding table are sufficiently representative of the types of uses that are made of the park by the public. Consultation with the stakeholders is an appropriate proxy for the wider public.
- 7.34 The analysis by Rob Greenaway & Associates (2025) provided at **Appendix B4** outlines that the number of members of the public who currently use and access the overburden disposal DOC-Give area is very small. That reflects that this area does not have track access, other than via an alternative to the Buchanan's Road track in the north corner.

Transpower infrastructure

- 7.35 The National Grid, operated by Transpower New Zealand Ltd, traverses part of the proposed exchange area. However, the land under or around the lines is not subject to any designation or easement.
- 7.36 The electricity infrastructure is subject to rights under the Electricity Act 1992, which allows Transpower rights to enter land. That position will be unaffected by the proposed exchange.
- 7.37 The proposed exchange area is traversed by the National Grid: 'Haywards-Melling 'B' (HAY-MLG-B). The span of most relevance is that between steel towers HAY-MLG-B0008 and HAY-MLG-B0009.

¹⁰ See the Expert Panel decision on the application for approvals for the Bledisloe North Wharf and Fergusson North Berth Extension [FTAA-2503-1028] dated 21 August 2025 at paragraph 89.

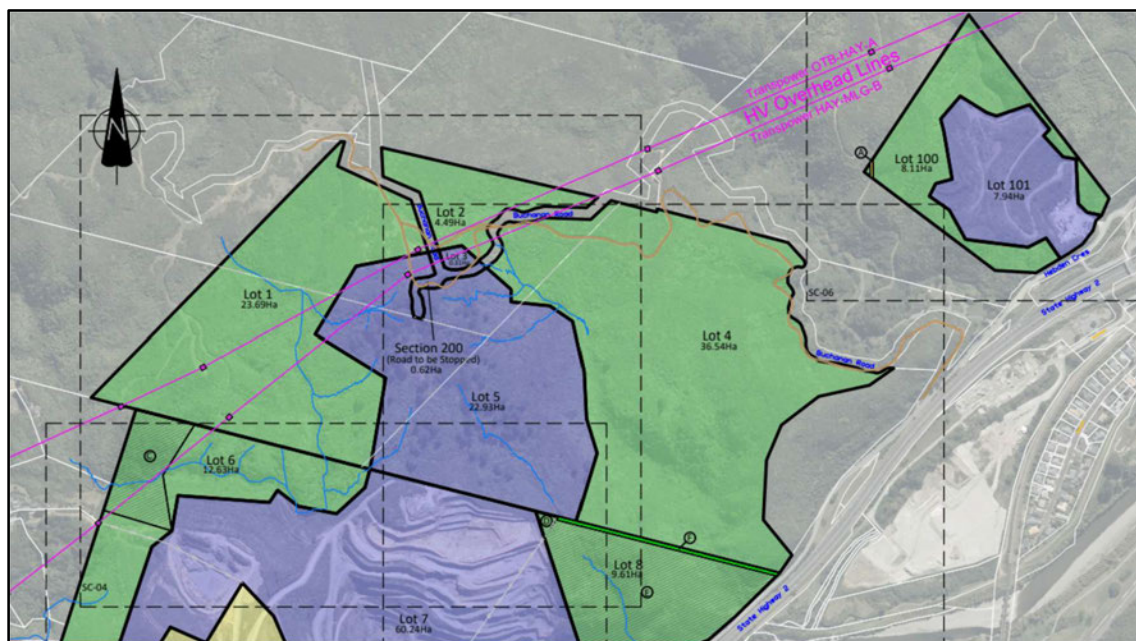


Figure 10: National Grid shown in pink, in relation to DOC-Give in purple.

Conclusion

7.38 This section has identified the parties who have or may have interests in the exchange parcels or who may otherwise be affected by the proposal. The parties include owners and occupiers of the exchange areas and adjacent land, Treaty settlement groups and other mana whenua groups, central and local Government and other administering authorities, and users of the regional park. The consultation that has been undertaken with these parties is set out in the next section and a separate consultation report.

7.39 The following list summarises the persons and groups who are likely to be affected by the project, as required by s 13(4)(j):

- The Crown (Department of Conservation);
- Wellington Regional Council (Greater Wellington)
- Hutt City Council
- Owners of adjacent land identified at paragraph 7.6;
- Taranaki Whānui
- Ngāti Toa
- Te Āti Awa
- Muaūpoko
- Rangitāne o Wairarapa and Rangitāne o Tāmaki nui-ā-Rua
- Queen Elizabeth The Second National Trust
- Federated Mountain Clubs (FMC)

- Transpower
- New Zealand Transport Agency (NZTA)
- Friends of Belmont Regional Park
- Pareraho Forest Trust
- Predator Free NZ
- Heritage New Zealand Pouhere Taonga (HNZPT)
- Kāinga Ora Homes and Communities
- Holcim (New Zealand) Ltd
- Fulton Hogan
- Firth Concrete.

8.0 Consultation undertaken (Section 11, Schedule 6 Clause 24(f))

Overview

- 8.0 This section provides a summary of consultation undertaken in accordance with section 11, section 13, section 27(3)(c)(iii), section 35 and clause 24(f) of Schedule 6 of the Act. The requirements for section 11(c) and (d) do not apply in this case due to the geographic location of the site.
- 8.1 The details of consultation undertaken, including how feedback received during the consultation was addressed, are provided in the Consultation Report at **Appendix C**.

Relevant Local Authorities

- 8.2 In meeting the requirements of section 11(a), Winstone has held several pre-lodgement consultations meetings with GWRC and HCC on its fast-track application since early 2024. Earlier discussions occurred with GWRC about a potential exchange from 2018-2021. Winstone approached both GWRC and HCC at an earlier stage to discuss its application to be a listed project in 2024.

Greater Wellington Regional Council

- 8.3 The purpose of these meetings was to introduce the Belmont Quarry project and to seek feedback on the proposal (in particular, park management, designation matters and recreation and access). Site visits were conducted with GWRC Councilors in May 2025 and Winstone has continued to meet with GWRC officials as the land exchange has progressed.
- 8.4 Agreement was reached with GWRC that addresses any concerns in its capacity as statutory manager and occupier of the park. GWRC has also provided written consent as requiring authority under s 178(1) of the RMA 1991 for both the exchange and other approvals required under fast track for Winstone use of the land in the event the exchange is approved. GWRC has also agreed to amend the extent of its designation over the regional park to remove the DOC-Give land, in the event the land exchange is approved.

Hutt City Council

- 8.5 The purpose of these meetings was to introduce the Belmont Quarry project and to seek feedback on the proposal. Consultation with HCC has been limited to its interest in the land relating to one encumbrance on the Firth Block currently owned by Winstone which is proposed to be included in the land exchange with DOC. Consultation with HCC has also occurred, separate from the fast track process, with regard to the paper road within the DOC-Get land.
- 8.6 There is an existing encumbrance for the protection of vegetation in favour of Hutt City Council on land with legal description Part Lot 1 DP 22561 and record of title WN31D/969. Hutt City Council as holder of the encumbrance has given its

agreement to the land exchange proposed by Winstone (pursuant to Schedule 6, clause 31(1)(b) of the Act) and/or its agreement to discharge the encumbrance if that is needed

- 8.7 A copy of the letter from Hutt City Council is included in **Appendix D2**. This contains an agreement for the discharge of the encumbrance.

Iwi Authorities, Hapū and Treaty Settlement entities

- 8.8 In meeting the requirements of section 11(b) of the Act, Winstone has engaged with the following groups with interests in the project area. All of these groups were contacted and responded positively to requests from Winstone to consult and engage.
- 8.9 Engagement has occurred through in person meetings, online hui, site visits and email exchanges with:
- The Port Nicholson block (Taranaki Whānui ki te Upoko o Te Ika).
 - Ngāti Toa Rangatira.
 - Te Āti Awa Nui Tonu.
 - Rangitāne Tū Mai Ra. and
 - Muaūpoko.
- 8.10 The proposed exchange area sits within the rohe of Taranaki Whānui ki Te Upoko o Te Ika and Ngāti Toa Rangatira. Both iwi have settled historical Treaty claims. The parcels involved in the land exchange are not identified as RFR land under either settlement. Relevant cultural redress and DOC protocols are acknowledged in the Consultation Report.

Taranaki Whānui ki te Upoko o Te Ika and Te Āti Awa Nui Tonu

[REDACTED]

[REDACTED]

Ngāti Toa Rangatira

[REDACTED]

[REDACTED]

Rangitāne Tū Mai Ra

[REDACTED]

Muaūpoko

[REDACTED]

Relevant administering agencies

Department of Conservation

8.17 Engagement with the Department of Conservation began in October 2023 and continued throughout the development of the land exchange application. The main points of engagement included:

- Land exchange mechanics, biodiversity assessment criteria and general expectations regarding the land exchange application
- Application of DOC policy documents and approach to evaluation of land and consultation expectations
- Feedback on ecology, landscape, archaeology, flood hazard, hydrology and recreation reports.

Heritage New Zealand Pouhere Taonga

8.18 Engagement began with HNZPT in May 2025. The draft archaeology report was provided with no comments from HNZPT.

Holders of Interests in the Land (s11(1)(f))

Queen Elizabeth II National Trust

8.19 Engagement with QEII began in July 2025. QEII representatives attended a site visit to Belmont Quarry in September 2025. QEII has adopted a neutral position on the proposed development. A memo reflecting the QEII position is provided in **Appendix D9**.

Transpower New Zealand Limited

8.20 Winstone Aggregates has engaged with Transpower through online meetings and written correspondence since August 2025. Transpower's primary interest is maintaining legal and physical access to utility tracks for asset maintenance. In its

letter of 16 October 2025, Transpower confirmed it has no opposition to the proposed land exchange. The letter from Transpower is provided at **Appendix D10**.

Firth Masonry

- 8.21 Firth Masonry is an occupier of land subject to the exchange and supports the land exchange project as it secures long-term supply of aggregates essential for the development of the Wellington region. A letter of support was received on 1 December 2012 and is attached at **Appendix D11**.

Fulton Hogan

- 8.22 Fulton Hogan is an occupier and leases premises immediately adjacent to the land exchange boundary. Fulton Hogan provided a letter of support for the land exchange project dated 27 November 2025 and is provided at **Appendix D12**.

Holcim New Zealand Limited

- 8.23 Holcim (New Zealand) Limited is the leaseholder of the Premise and Access areas adjoining the proposed land exchange boundary. Holcim (New Zealand) Limited provided a letter on 5 December 2025 noting in principle support for the project and is provided at **Appendix D13**.

Adjacent landowners and occupiers (s53(2)(h),(i))

- 8.24 The Belmont Quarry area is bordered to the south-west, west and north-west by rural residential properties accessed from Liverton Road and Kaitangata Crescent. Winstone visited the properties of neighbouring residents to provide information packs and to discuss the proposal. The properties included: 87B Kaitangata Crescent, 89 Kaitangata Crescent, 180 Kaitangata Crescent, 104 Kaitangata Crescent, 104 Liverton Road, 198 Liverton Road, 184 Liverton Road and 174 Liverton Road.
- 8.25 Residents who were available raised matters relating to outlook, boundary weed control and sediment management. Winstone has committed to ongoing engagement with these neighbours as the project progresses.
- 8.26 Further detail is provided in the Consultation Report and consultation tables at **Appendix C**.

Additional consultation (S13(4)(j))

Kainga Ora

- 8.27 Winstone engaged with Kāinga Ora from September 2025 to confirm its interests in relation to the Belmont Quarry project. Kāinga Ora provided a written response confirming in principles on the land exchange and is provided at **Appendix D14**.

Friends of Belmont Regional Park

- 8.28 Winstone engaged with the Friends of Belmont Regional Park as the exchange affects parts of the regional park. The group highlighted the presence of remnant swamp maire in the proposed overburden area, raised concerns about hydrology changes in several gullies, and questioned the ecological condition of Dry Creek.

Kelson Community Centre

- 8.29 Winstone provided the Kelson Community Centre with a summary of the proposal and the September Stakeholder Update. The Centre confirmed it has no interest in the project.

Pareraho Forest Trust

- 8.30 Winstone provided the Pareraho Forest Trust with project information and the September Stakeholder Update. The Trust confirmed that its interests will be represented by the Friends of Belmont Regional Park and expressed satisfaction with that engagement approach.

Persons to be invited for written comment (Cl 25, Sch 6)

- 8.31 The following parties are identified by cl 25(a)–(d) of schedule 6 as parties who must be invited to provide written comments by the Director-General of Conservation.

New Zealand Conservation Authority

- 8.32 Winstone contacted the New Zealand Conservation Authority several times between June and October 2025 and circulated the September Stakeholder Update with an offer to meet. The Authority did not schedule a meeting or provide further correspondence. Winstone will continue to progress opportunities to engage as the project continues.

Wellington Conservation Board

- 8.33 Winstone engaged with the Wellington Conservation Board through email correspondence and project updates and presented to the Board on 19 September 2025. The presentation outlined project changes and proposed improvements, and discussions focused on weed and pest management.

New Zealand Fish and Game Council

- 8.34 Winstone engaged with Fish and Game through emails, updates and a meeting, and provided the draft Ecological Report confirming no trout spawning within the proposed site. Fish and Game advised that the area is unlikely to be significant sport fish habitat and requested strong sediment controls for Te Awa Kairangi.

Game Animal Council

- 8.35 Winstone sent a formal letter and project update to the Game Animal Council and invited a meeting. The Council confirmed the proposal sits outside its statutory focus and advised that no comment or further consultation was required.

9.0 Comparative Assessment of Conservation Values (Sec 11. Schedule 6, Clause 23)

- 9.1 This section is prepared in accordance with Section 33 and Schedule 6, Clause 24(a) of the Act to provide:
- An assessment of the conservation values of both pieces of land and explains why the proposed exchange would benefit the conservation estate.
 - An identification and description of the values for ecology, landscape and visual amenity, recreation, cultural, and archaeology and other relevant attributes that affect those values.
 - A comparative analysis of the conservation values of the Winstone (Fletcher-owned) land (DOC-Get), the Crown-owned land proposed to be transferred to Winstone (Fletcher) (DOC-Give), including an explanation of why the exchange would benefit the conservation estate.¹¹

Statutory framework

- 9.2 The comparative assessment is guided by the Conservation Act 1987 and the Reserves Act 1977. Together, these legislative provisions provide the framework for assessing the conservation values of both the DOC-Give and DOC-Get areas under Clause 24(a) of Schedule 6 to the Act.
- 9.3 Under Schedule 6, Clause 22 of the Act, a land exchange is defined as an exchange of land between the Crown and another party where land administered under the Conservation Act 1987 is proposed to be exchanged for other land to be held for conservation purposes.
- 9.4 The Conservation Act 1987 defines conservation 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’*.¹² This establishes a broad scope of values that includes ecological, landscape, historic, and public appreciation aspects.
- 9.5 Because the DOC-Give land is held as a recreation reserve and the DOC-Get land may have the same status following the exchange (Schedule 6, clause 34(2) of the Act), the Reserves Act 1977 also provides relevant guidance for identifying conservation values. It recognises that reserves may possess a wide range of values, including those relating to recreation, wildlife, indigenous flora and fauna, landscape amenity, natural character, and cultural or historic features.¹³
- 9.6 The general purpose of recreation reserves under Section 17 of the Reserves Act 1977 is to provide areas for public recreation and physical welfare while protecting the natural environment and scenic qualities of the countryside.¹⁴ Recreation

¹¹ FTAA 2024 Schedule 6, Clause 24(a).

¹² Conservation Act 1987 at s 2.

¹³ Reserves Act 1977, section 3(1).

¹⁴ Reserves Act 1977, section 17(1).

reserves are administered for public entry and access, the management and protection of scenic, historic, archaeological, biological, geological, or other features, and the conservation of the qualities of the reserve and its value as a soil, water, and forest conservation area.¹⁵ These purposes emphasise the balance between public use and environmental protection, which is directly relevant to the assessment of the DOC-Give area.

Method for Comparative Values Assessment

- 9.7 The following disciplines were used to provide a comparable assessment of natural, cultural, and social resource values in each piece of land. Each subject field was assessed on site by a relevant expert, who prepared a report on the corresponding values for each piece of land included within the land exchange proposal.

Table 15: Conservation values used in comparative assessment.

Natural values	Ecology
	Landscape
	Hydrology
Social and cultural values	Recreation
	Archaeology
	Mana whenua

- 9.8 In consultation with relevant experts, scoring matrix tables have been developed for each category, covering all blocks of land that comprise the Land Exchange proposal. Each of these tables has been categorised according to specific criteria established by the relevant subject matter experts involved in the land exchange proposal, in line with appropriate industry guidelines.
- 9.9 Each evaluation criterion is scored based on the parameters of the scoring index contained within the Evaluation Framework tables for ecology, landscape, archaeology, and recreation. The score for each value is directly ascribed from the findings and/or observations of the associated expert reports. Individual field scores can be assessed for each separate DOC-Get Area against those of the DOC-Give.
- 9.10 Subsequently, the values for each discipline within DOC-Get are combined to provide a total score for all the land currently proposed for exchange. These scores are then compared as a package to the total score of the DOC-Give Land to provide evidence regarding whether the land exchange will result in a net conservation benefit. A weighted approach has not been used as the types of values under consideration are not comparable.
- 9.11 The benefit of a comparative analysis across each of the DOC-Get Areas rather than only for the total area acquired by the Crown is that it allows for the identification of the specific regions and criteria in which the land exchange could result in a net loss in conservation value. The identification of specific areas of potential loss has guided direction, development scope and focus of the proposed improvement work

¹⁵ Reserves Act 1977, section 17(2).

proffered by Winstone as part of the land exchange agreement. Such improvement work will be undertaken to ensure that the land exchange agreement results in a net conservation benefit across all categories.

Ecology (Flora)

Scope and Method

- 9.12 Blue Green Ecology Ltd prepared an ecological assessment to inform the proposed land exchange between Fletcher and DOC. The assessment identifies and compares terrestrial and aquatic ecological values across the DOC-Give and DOC-Get areas, drawing on field surveys, desktop analysis, and ecological scoring. The evaluation considers vegetation and habitat types, avifauna, herpetofauna, and freshwater ecology. Information from the Landscape and Visual Effects Assessment (Boffa Miskell, 2025) was also referenced to provide context for landscape connectivity.
- 9.13 The assessment criteria used in the ecological scoring matrix have been confirmed in consultation with DOC and BlueGreen Ecology Ltd taking into account feedback given by DOC, a mixed approach has been adopted to capture the complexity of ecological systems. To strengthen the comparative analysis, two metrics are employed:
- The four ecological assessment criteria established within Table 1 are consistent with those in the National Policy Statement for Indigenous Biodiversity; together, they feed into a scoring system in accordance with the Environment Institute of Australia and New Zealand's (EIANZ) 2018 Guidelines to give an overall value for each area involved with the land exchange proposal. This approach is quantitative, grounded in well-established principles and processes.
 - Table 2 includes a consideration of a range of ecological functions and processes and other aspects not overtly covered by the EIANZ process. BlueGreen Ecology developed this set of assessment criteria and complements the quantitative EIANZ (2018) assessment criteria. Each score is given a numerical value to allow for direct comparison.
- 9.14 Scoring is based on Tables 5, 6, and 7 of BlueGreen Ecology (2025) at section 5.4. Together, these assessment criteria are used to analyse results from comprehensive field-based surveys of ecological values in both the DOC-Get and DOC-Give areas. The field-based surveys were undertaken by suitably qualified and experienced experts over several years, from 2016 to the present. The results of these assessments inform the scoring of each of these criteria as set out in section 4 of this report. Each criterion is assigned a score (Very High, High, Moderate, Low or Negligible) based on the assessments of its attributes in BlueGreen Ecology (2025).

DOC-Give Area

- 9.15 The land proposed to be exchanged from Crown ownership forms part of Belmont Regional Park and lies within the Belmont-Dry Creek Key Native Ecosystem (KNE). Vegetation within the proposed OBDA and adjacent setback is dominated by regenerating mahoe, kanuka, and secondary broadleaf species.
- 9.16 Few canopy-forming species are present, with Rewarewa (*Knightia excelsa*) the most common. A small inland wetland is located in the upper catchment containing young swamp Maire trees (*Syzygium maire*), representing the only naturally occurring wetland vegetation in the assessment area. Habitat quality is variable, with evidence of historic quarry-related disturbance and limited ecological connectivity to the surrounding native forest.

DOC-Get Areas

- 9.17 The Fletcher-owned land proposed to be added to the conservation estate comprises four parcels: the Northern Gully block, the Southern Gully block, the Firth Block, and the Dry Creek block. These areas support a greater diversity and maturity of native vegetation, including late-seral Tawa-Kāmāhi forest and mature pukatea remnants that are under-represented in the Wellington Region (Singers et al., 2018, as referenced in Blue Green (2025)). The forest and scrub associations provide strong ecological linkages between gullies and established forest remnants, improving corridor function across the Belmont landscape.

Results (Flora)

- 9.18 The findings of BlueGreen (2025) are relied upon here and adopted in full.

Table 16: Results of the ecological assessment using the first assessment method.

Vegetation type	Representativeness	Rarity and distinctiveness	Diversity & pattern	Eco context	EIANZ (2018) Outcome
North tawa-kāmahi	High	High	Moderate	High	Very High
Southern Gully	Moderate	High	Moderate	High	High
Cottle extension	Moderate	Moderate	Moderate	Moderate	Moderate
Firth QEII	High	Low	Moderate	Moderate	Moderate
Dry Creek	Moderate	Low	Low	Low	Low
OBDA + setback	Moderate	High	Moderate	Low	Moderate

Table 17: Results of the ecological assessment using the second assessment method.

Function / process/	North western tawa-kamahi	Southern Gully	Cottle block	Firth Qell	Dry Creek	OBDA + setback
Weed and pest resilience	High	Low	Low	Moderate	Low	Moderate
Mature forest resources	High	Low	Moderate	Moderate	Low	Low
Signs of later canopy species development	Moderate	Low	Low	Low	Low	Low
Wetland hydrology	No	Moderate	Low	No	No	Moderate
Stream habitat	High	Low	Moderate	Low	Low	None
Stream protection functions	High	Moderate	Moderate	None	None	Low
Other buffering roles	Negligible	Low	Low	Low	Negligible	Low
Intact canopy	High	Low	Low	High	Low	Low
Core habitat due to size or location	Low	Low	Low	Low	Low	Low
Special resources	High	Low	Low	Low	Negligible	Low
Corridor or movement assistance roles	Negligible	Moderate	Low	Moderate	Negligible	Low
Numerical outcome	21	14	13	14	7	12
Averaged outcome (#/5)	High	Moderate	Moderate	Moderate	Low	Moderate

0=Negligible/none, 1= low, 2= moderate, 3 = high, 4=very high.

Table 18: Combined results for both sets of Ecological scoring criteria used by BlueGreen Ecology (2025).

Function / process	North western tawa-kamahi	Cottle scrub	Southern Gully	Firth QEII	Dry Creek	OBDA + setback
Ecological factors and functions assessment	High	Moderate	Moderate	Moderate	Low	Moderate
EIANZ (2018) processes	Very High	Moderate	High	Moderate	Moderate	Moderate

9.19 In summary, this table shows that the proposed land exchange will result in a **net gain to the conservation estate with** regard to the vegetation value.

9.20 This is bolstered by a range of ecological improvements to be carried out by Winstone, as outlined in the improvement section and provided for in the proposed conditions of the exchange agreement. These improvements are intended to enhance the ecological value of the DOC-Give area, where certain criteria were found to have values equal to or lower than those within the DOC-Give Area. These improvements are described in section 10 of this report.

Comparative Assessment

9.21 Blue Green Ecology Ltd concludes that the proposed exchange provides the Department of Conservation with a greater area and a higher level of ecological value than the land being transferred out of the conservation estate. The addition of Northern and Southern Gullies, Firth Block, and Dry Creek to the conservation estate would therefore result in a measurable ecological gain.

Summary and Key Findings

- 9.22 The assessment shows that there will be a **net benefit in habitat values**. When considered as a whole, the land that Winstone's is proposing to offer to the Crown is shown to have moderate ecological value. In contrast, the land they propose to receive in return is shown to have very low ecological value. Individually, the Northern Gully area is found to have high ecological value and, on its own, would provide a significant increase in conservation values within the conservation estate as it contains substantial areas of remnant indigenous vegetation of a type that is regionally uncommon within the Wellington region.
- 9.23 In comparison, the DOC-Give area primarily contains a mix of native and exotic regenerating vegetation, commonly found across the eastern portion of the Belmont Regional Park. The total ecological value of the DOC-Give area is reduced when averaged across all DOC-Get areas. Although still higher than the DOC-Give area, the Dry Creek and Firth Block areas were found to have lower values than the Northern Gully area. Nevertheless, it is clear that from an ecological perspective, the proposed land exchange will benefit the conservation estate by securing and protecting significant areas of remnant indigenous vegetation.

Ecology (Fauna)

Scope and Methods

- 9.24 Ecological assessments were prepared by Blue Green Ecology, Blueprint Ecology, and Boffa Miskell, to inform the assessment of fauna values in the proposed land exchange between Fletcher and DOC. The assessment identifies and compares terrestrial and aquatic fauna values across the DOC-Give and DOC-Get areas, drawing on field surveys, desktop analysis, and ecological scoring.
- 9.25 **Lizards:** Survey of herpetofauna was undertaken by Blueprint Ecology who undertook field surveys in the form of ground cover catches, and spotlighting. This survey was supplemented by desktop review of literature and raw data. Consideration was also given to the habitat assessments presented above.
- 9.26 **Bats:** Survey of bats was undertaken by Boffa Miskell, who also undertook field surveys in the form of acoustic recording/monitoring followed by desktop analysis of raw data. In-field monitoring for browse was also undertaken.
- 9.27 **Birds:** Finally, avifauna surveys were conducted and results presented in BlueGreen Ecology (2025). These surveys were in the form of audio recording in the field, and supported by desktop data analysis as well as consideration of habitat analysis.

Bats

- 9.28 The presence/absence of bats and their habitat was considered in Boffa Miskell (05/12/25). To determine the likelihood of bats being affected by this project, an acoustic survey has been undertaken to assess the presence or likely absence

within the areas of land included in the proposed land exchange. A desktop study of DOC database records supplemented fieldwork.

9.29 Acoustic surveying was conducted in both the DOC-Get and the DOC-Give areas; none of the recorders detected any bat passes. Boffa Miskell (2025) finds that, from the survey undertaken, it is not considered likely that long-tailed or short-tailed bats are regularly roosting within either the DOC-Give or DOC-Get. No evidence of foraging was detected during field surveys.

9.30 The land exchange is considered to be **net-neutral** for bats.

Birds

9.31 Blue Green Ecology Ltd (02/12/25) provides a compiled list of avifauna species recorded by ecologists while undertaking various site investigations, by the bioacoustics recorders, as well as by other sources in the wider area. Many species recorded in the area are native, not threatened (nationally and regionally), and are primarily associated with native forests and shrublands (e.g., kereru, fantail, silvereye, grey warbler, ruru, tui, and bellbird). The Belmont-Dry Creek KNE site is known to provide habitat for at least one breeding pair of NZ bush falcon, which is classified as both nationally and regionally threatened (Crisp et al., 2024; Robertson et al., 2021, as referenced in Blue Green Ecology Ltd (2025)). Other native forest or shrubland species not recorded in any of the data sources but which may also be present in low numbers in the wider landscape include kaka, parakeets (*Cyanoramphus* sp.) and rifleman.

9.32 Likely as a result of the mosaic of vegetation and habitat types within both the proposed OBDA and land exchange areas, and the mobile nature of birds, these areas are all likely to provide foraging, as well as potentially nesting habitat for low numbers of most native species. The farm pond and associated wetland, as a feature of the Firth QEII block, is likely a unique feature that provides habitat for species that were not recorded in other habitats (e.g. shag species), and this was the only habitat type in which threatened and at risk species were recorded.

9.33 The land exchange is considered to be **net-neutral** for indigenous birds.

Lizards

9.34 Lizard habitat and species presence/absence have been considered in Blueprint Ecology (03/12/2025).

9.35 In terms of lizard habitat, Figure 5 of Blueprint Ecology (2025) shows that the DOC-Give land has approximately 18.83 ha of lizard habitat, while the DOC-Gets area has approximately 33.19 ha. Given that the seral forest areas are all part of a contiguous cover of vegetation which is continuous across a larger area of the Western Hutt hills, Blueprint Ecology (2025) considered it to be reasonable that there is a like-for-like habitat quality/composition, equivalence of values and likelihood of lizard occurring within all of the areas.

9.36 Based on the findings of Blueprint Ecology (2025) at sections 2 and 3, it seems likely that the DOC-Get area has more lizard habitat than the DOC-Give. Overall, the

Department receives a significant increase in lizard habitat extent and quality as part of the proposed land exchange.

- 9.37 The land exchange is considered to have a **net benefit** for the indigenous lizard habitat.

Summary and Key Findings

- 9.38 The assessment shows that there will have the following impact on fauna values:
- i. The proposal is net-neutral for bats, and there are no bats in either DOC-Give or DOC-Get although likely habitat exists in both areas.
 - ii. The proposal is neutral for birds, given the heterogenous nature of the habitat and highly mobile nature of avifauna. There may be a slight net-gain in the habitat type present, for semi-aquatic species, in the form of the farm wetland at north Firth Block.
 - iii. The proposal provides a net-gain for lizard habitat, with significantly moderate and high value habitat in the DOC-Get compared to the DOC-Give.

Ecology (Aquatic)

Scope and Method

- 9.39 Aquatic habitat is considered in BlueGreen Ecology (2025) report at 8. As illustrated in Figure 48 of Blue Green Ecology (2025), the DOC-Give land is shaped by the ephemeral headwaters of six gully systems that lead into the perennial systems. The perennial area in the east-central system is part of the natural inland wetland feature. Three eastern and three western discharging features deliver water into the central-northern mainstream and the eastern main stem of the stream.
- 9.40 Sampling of macro-invertebrates and fish was undertaken by Boffa Miskell and analysed in BlueGreen Ecology (2025). Sampling occurred in the field and was supplemented by desktop assessment.

Aquatic values

- 9.41 Freshwater habitats within the DOC-Get land include intermittent and ephemeral streams that provide moderate aquatic habitat value. These watercourses are unnamed tributaries within Te Awa Kairangi / Hutt River catchment, contributing to the downstream hydrological network. These watercourses support native species such as kōura and longfin eel, contributing to hydrological and ecological connectivity.
- 9.42 Historically, the Dry Creek site supported a stream, but most of that was piped under the old overburden. The Northern Gully has two of the four main perennial streams in the area. The larger originates from the west and meets the central northern system at the Quarry pipe entrance, and flows beneath the quarry to Te Awa Kairangi / Hutt River.
- 9.43 In the Southern Gully, an intermittent tributary system connects into the Southern Gully main stem south of the gully site, and then down two waterfalls to the Te Awa Kairangi / Hutt River. via the creek in Southern Gully.
- 9.44 With regard to fish passage and habitat, all the systems face significant challenges from the Te Awa Kairangi / Hutt River. Fish surveys in the central and western perennial system demonstrate that there are no trout hatcheries or fisheries in any stream potentially subject to the proposed land exchange. Downstream of the proposed OBDA (east) , the gully areas are largely intermittent and regularly exhibit flows near zero flow throughout the year, meaning that they are unlikely to present as fish habitat and only as macroinvertebrate fauna semi-terrestrial). They are largely damp, muddy gully floors with relatively abundant woody and leaf debris. Those perennial reaches further downstream have good macroinvertebrate habitat, and kōura are likely common (especially with the reduced fish predation).
- 9.45 Boffa Miskell surveyed approximately 400 m of both the central main stem (they label as Buchanan Stream), and the western main stem (they label as Kaitangata Stream) as referenced in Blue Green Ecology (2025), assessing for macroinvertebrates, fish and habitat conditions. There is no data for the system east of the proposed OBDA, nor the Dry Creek site stream.

- 9.46 Using the EIANZ evaluation system, the northern main stem was highly representative (despite the general absence of fish), with moderate rarity, distinctiveness, diversity and ecological context. It contained the shortfin eel (*Anguilla australis*), longfin eel (*Anguilla dieffenbachia*) and koura (freshwater crayfish), (*Paranephrops planifrons*).
- 9.47 The western main stem ranks moderate across all factors. This reflects the fact that to fish species/individuals were surveyed; however, kōura are present. It is therefore considered to have moderate aquatic habitat value.
- 9.48 The stream in the Southern Gully has received no survey other than the visual observations, and those indicate that it is a perennial system with good instream aquatic habitat quality, with a mixed hard substrate base under forest canopy and likely includes banded kokopu. Through the lower wetland, it is more entrenched, narrower, with a dense sedge and grass cover and is likely good habitat for koura.

Summary and key findings

- 9.49 Overall, the DOC-Get Land contains more perennial riverine environments for fish. Both the DOC-Give and the DOC-Get (at Southern Gully) contain wetland habitat for fauna. Taken together, the land exchange is considered to have a net benefit for habitat for aquatic fauna.

Landscape

Scope and Method

- 9.50 Boffa Miskell Ltd were engaged to undertake a landscape assessment. The evaluation follows *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines* and draws on field investigations, desktop review, and GIS visibility modelling. It evaluates the physical, perceptual, and associative attributes of each site, alongside any visual implications, in the context of the Act, the Conservation Act 1987, and the Reserves Act 1977. Supporting information from the ecological and recreation assessments was also reviewed to ensure that the landscape context and relationships are accurately represented.
- 9.51 The identification and understanding of the landscape values listed in Table 3 below are used to inform an evaluation of each land area, which in turn determines the sensitivity and capacity of this landscape to accommodate the changes resulting from the land exchange proposal. With reference to assessing the consequences of change on existing landscape values, 'sensitivity' refers to a specific landscape's susceptibility to the potential effects of a proposed change. 'Capacity' is an estimate of how the landscape values within an area can accommodate change without losing their inherent values.

Table 19: Evaluation criteria and scoring index for landscape value.

Landscape value	Definition	Scoring index
Physical	Physical attributes refer to the tangible elements of the landscape, such as landforms, soils, vegetation, climate, waterways, and wildlife, as well as built and modified features such as roads, buildings, land-use patterns, and heritage sites. These elements together shape the landscape's physical structure and ecological function.	Landscape assessment has involved an analysis of relevant factors based on a standard seven-point scale from very low to very high to determine the overall landscape value of each site, as set out below (in order of increasing value): Very Low - 1 Low - 2 Low-Moderate - 3 Moderate - 4 Moderate-High - 5 High - 6 Very-High- 7
Associative	Associative attributes capture the cultural, historical, and spiritual connections that people and communities have with a place. These include tāngata whenua traditions, stories, and values, as well as shared and recognised meanings linked to identity, belonging, and lived experience.	
Perceptual	Perceptual attributes relate to how people experience and interpret the landscape. This includes its visual coherence, aesthetic qualities, sense of scale, and the way natural and human-made features come together to form a legible and memorable environment.	

Note: *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines* notes caveats against placing too much weight on such rating in isolation, and the importance of the substantive content of the assessment, especially the identification of attributes and values through which judgements are made.

DOC-Give Area

- 9.52 Within the DOC-Give area, the proposed OBDA occupies a rolling ridgetop and spur (c. 160-216 m AMSL) flanked by steep gullies, immediately adjoining the established quarry. The Boffa Miskell assessment assigns a moderate landscape value and low-moderate visibility, reflecting the site's contained landform, regenerating vegetation, and screening by the Western Escarpment; potential long-range views are primarily from elevated areas of the Eastern Hutt Hills. The proximity of the proposed OBDA to the established quarry reflects a relatively contained aspect of the broader Belmont Hills, with the capacity to absorb progressive quarry development.

DOC-Get Areas

- 9.53 The four parcels of Fletcher-owned land proposed for addition to the conservation estate, Northern and Southern Gullies, Firth Block, and Dry Creek, are directly connected to the north-eastern edge of Belmont Regional Park. Each contributes to a natural and cohesive landscape character. Northern Gully and Firth Block strengthen the continuity of the Western Escarpment and provide a vegetated visual buffer that screens quarry activity from surrounding parkland. Dry Creek extends the established pattern of vegetated valley slopes and enhances the sense of enclosure and visual coherence within the lower catchment. Collectively, these areas have moderate to high landscape value, reflecting their greater naturalness, visual integrity, and compatibility with the park's existing landscape character.

Results (Landscape)

- 9.54 The findings of Boffa Miskell Ltd (2025), Chapter 6, are relied upon here and adopted in full.

Table 20: Results of the landscape assessment using the assessment criteria outlined in the Landscape Assessment Guidelines.

Site name:	DOC-Give	Firth Block	Northern Gully	Dry Creek	Southern Gully
Physical	Moderate (4)	Moderate-High (5)	Moderate-High (5)	Moderate (4)	Moderate (4)
Perceptual	Moderate (4)	High (6)	Moderate (4)	Moderate (4)	Moderate (4)
Associative	Moderate (4)	Moderate-High (5)	Moderate-High (5)	Low-Moderate (3)	Low-Moderate (3)
Overall rating	Moderate (4)	Moderate-High (5)	Moderate-High (5)	Moderate (4)	Moderate (4)
Visibility	Low-Moderate (3)	High (6)	Low (2)	Low-Moderate (3)	Low-Moderate (3)

- 9.55 This table shows that there is a net-gain in the landscape conservation values within land owned by DOC as a result of the proposed land exchange.

- 9.56 The Proposed OBDA maintains moderate-low landscape values that are well-suited to absorbing change due to this site's contained location and adjoining quarry context. In contrast, the land parcels offered in exchange—Northern Gully, Firth Block, and part of Dry Creek—are of higher collective relative landscape value, with moderate to moderate-high landscape value, and therefore afford a greater relative contribution to the Conservation Estates' overall conservation value. The exchange will consequently result in a net landscape gain and is considered appropriate from a landscape perspective

Comparative Assessment

- 9.57 The Boffa Miskell assessment concludes that the proposed land exchange would result in a net benefit to the landscape and visual values of the conservation estate. The DOC-Give area is described as having moderate landscape value and low to moderate visibility, reflecting its visually contained landform, regenerating vegetation, and screening from the Western Escarpment. The report notes that while the area forms part of the wider vegetated backdrop of the Western Hills, it is modified by historical landform alteration and influenced by proximity to existing quarry operations, resulting in a lower perception of naturalness.
- 9.58 In contrast, the DOC-Get land is assessed as having moderate to high landscape value due to its well-integrated and natural landscape character, enclosure, and visual coherence with low to high visibility with the adjoining Belmont Regional Park. The report finds that these areas reinforce the vegetated ridgeline, enhance the continuity of native forest cover, and strengthen the visual buffer between quarry operations and the surrounding parkland.
- 9.59 When taking into account landscape capacity, the overall scores are as follows.

Table 21: Summary of comparative assessment of landscape values.

Proposed Land Exchange	Site	Landscape Value	Visibility	Landscape Capacity
DOC Land Given	Proposed Overburden Site	Moderate	Low–Moderate	Belmont Hills Moderate landscape capacity within the broad, undulating, rounded ridgetop which remains stepped back from the Western Escarpment and relatively well contained in the context of former working rural activity. Gullies support areas of mature forest well suited to long term nature conservation.
DOC Land Obtained	Northern Gully	Moderate–High	Low	
	Firth Block	Moderate–High	High	
	Dry Creek Quarry	Moderate	Low–Moderate	
	Southern Gully	Moderate	Low	Western Escarpment More limited capacity for change, most often visible within the context of areas of higher ecological and amenity value, including prominent revegetated spurs, enclosed wetlands and gullies. High capacity for enhancing landscape values including scenic aspects within the broader context of the Conservation Estate.

- 9.60 In conclusion, the proposed land exchange is assessed as representing a balanced and strategic landscape response that supports the continued operation of Belmont Quarry while enhancing the ecological, visual, and recreational values of the Conservation Estate adjoining Belmont Regional Park.

Summary and Key Findings

- 9.61 There is also a **net benefit in landscape values** in favour of the conservation estate. From a conservation perspective, areas with higher landscape values are more valuable because they are more sensitive to change and require greater protection to prevent visual impacts arising from their reduced capacity to withstand development.

Recreation, including public access

Scope and Method

9.62 Greenaway & Associates Ltd prepared a recreation assessment to inform the proposed land exchange associated with the Belmont Quarry Development Project (**Appendix A4**). The evaluation considers the recreational characteristics, features, and opportunities of the land proposed for exchange, comprising the DOC-Give area and the DOC-Get land. It describes the existing recreation setting, identifies the facilities and access arrangements, and evaluates the level of recreation value present in each parcel.

9.63 Information was compiled through site inspections, aerial imagery review, and reference to the Toitū Te Whenua Parks Network Plan 2020-2030, along with consultation with GWRC as land manager.

9.64 The assessment criteria below are used within the recreation assessment to qualitatively and categorically represent the recreation values that are present at each site. The criteria consider how easy it is for recreation users to access the site (access) and the recreation opportunities available there. The assessment criteria also consider factors that make recreation activities valuable or desirable, including the setting and the social and cultural heritage features present (the site's importance for social interaction and cultural heritage).

Table 22: Evaluation criteria and scoring index for Recreation.

Recreation value	Description
Access	Access (how easy it is for recreation users to access the site), Proximity to roads, public transport, and parking.
Opportunity	The variety of available activity types and the site's suitability for the chosen activity.
Setting	The quality and attractiveness of the natural environment.
Social and Cultural Heritage	The importance of the site for social interaction and cultural heritage.

DOC-Give Area

9.65 The DOC-Give area contains a 400 metre utility track that is parallel to 240 metres of the Buchanan Road Tramping Track. The report notes that the utility track “has low recreation value” and that it “adds nothing to the tramping experience and would not normally be maintained as a stand-alone experience.” The Greenaway & Associates assessment (**Appendix B4**) records that “the area has low recreation value”.

DOC-Get Areas

9.66 The assessment finds that these areas have nil to low recreation value. The Dry Creek Loop Track traverses 33 metres of the Dry Creek block. There are no recreation facilities or features of interest within the Northern Gully or Firth Block parcels.

Results (Recreation)

9.67 The findings of Greenaway & Associates (**Appendix B4**) are relied upon here and adopted in full.

Table 23: Summary of comparative assessment of recreation values.

Land unit and exchange	Existing recreation value	Future recreation value
Northern Gully (12.62 ha) DOC-Get	Nil: no public access	Low: public access, but no development
Firth Block (9.60 ha) DOC-Get	Nil: no public access	Low: public access, but no development
Dry Creek (7.94 ha) DOC-Get	Low: 33 m of public use track	Low: 33 m of public use track
Southern Gully (3.94 ha) DOC-Get	Nil: no public access	Low – public access but no development. Noting that the proposed ROW Z from Liverton Road to the Southern Gully Lot 9 provide only for conservation activities and maintenance by DOC, and general public access to the Southern Gully would be via Northern Gully.
DOC-Give (23.2 ha)	Low: ancillary utility track	Nil: no public access

9.68 This table shows that there is no-net-loss in the recreation values within land owned by DOC as a result of the proposed land exchange.

Comparative Assessment

9.69 The recreation assessment finds that the proposed land exchange involves the exchange of low recreation value land, with the DOC-Get parcels and the DOC-Give area each rated as having low recreation value. The report concludes that there will be no loss of recreational opportunities or experiences as a result of the exchange.

Summary and Key Findings

9.70 There will also be **no net loss in recreation values**. The existing access and terrain in the DOC-Get areas limit their current and potential recreational use. In comparison, the DOC-Give area has better access from Buchanan's Road and the flattest gradient among the land exchange areas. The four DOC-Get areas are better suited to creating recreational opportunities, given the presence of remnant indigenous forest. The comparative assessment undertaken by Greenaway & Associates (Appendix B4) incorporated the recreational improvements offered by Winstone's as part of the land exchange agreement into its final scores.

Hydrology

Scope and Method

- 9.71 Landscape Dynamics Ltd prepared a hydrological assessment to inform the proposed land exchange associated with the Belmont Quarry Development Project. The evaluation considers the extent and catchment of hydrological catchments and surface water bodies, comprising the DOC-Give area and the DOC-Get land. It describes the existing hydrological setting, identifies the stream length and catchment area in both exchange parcels, undertakes a comparative assessment for each parcel.
- 9.72 Landscape Dynamics (2025) completed a hydrological assessment of the catchment setting and hydrological processes in order to make observations of each block.

DOC-Give Area

- 9.73 Landscape Dynamics (2025) at paragraph 4.3 describe the catchment characteristics of surface water bodies as part of the OBDA (DOC-Give). Landscape Dynamics (2025) describes five (5) sub-catchments within the OBDA, with a focus on OBDA-3 and OBDA-4. These are shown in Figure 4.8 of Landscape Dynamics (2025).

DOC-Get Areas

- 9.74 Northern Gully has two notable hydrological features, these are Western Tributary and Northern Tributary. The western tributary of Waikoropupu Stream provides the principal flow in the 'Northern Gully'. It has a catchment area of about 78.6 ha, and the main stem of the stream is about 1.8 km long. Flow at the time of the site visit was approximately 20 L/s. The northern tributary of Waikoropupu Stream provides most of the remaining flow in the 'Northern Gully'. It has a catchment area of about 32.5 ha and the main stem of the stream is about 0.98km long. Flow at the time of the site visit was only about 5 L/s (see Figure 2.3 of Landscape Dynamics (2025)).
- 9.75 Southern Gully contains a watercourse draining from a small catchment. Southern Gully is an unnamed tributary of Te Awa Kairangi / Hutt River. Southern gully, at the area of exchange, also contains a wetland. See figure 2.8 of Landscape Dynamics (2025).
- 9.76 Firth Block contains two tributaries of Te Awa Kairangi / Hutt River. One is a small tributary from the face of Firth block, the second is a larger catchment from north of the DOC-Give land. See figure 2.6 of Landscape Dynamics (2025).
- 9.77 Dry Creek, in the area of the exchange, contains a surface water body, to be exchanged with DOC. The lower portion of Dry Creek catchment is affected by historical land use and is not proposed as part of the exchange. See figure 2.7 of Landscape Dynamics (2025).

Results (Hydrology).

9.78 The findings of Landscape Dynamics (2025) are relied upon here and adopted in full. These are set out below.

Table 24: Summary of stream channel assessment.

Table 5.1: Summary of stream channel metrics for the different potential exchange areas.

Land exchange parcel	Area (ha)	Longest stream in exchange area (m)	Stream length less than Strahler order 7	Stream length Strahler orders 7&8	Stream length greater than Strahler order 9	Total stream length in exchange area (m)	Upstream contributing catchment area (ha)
OBDA	23.24	265	899	723	223	1,845	89.2
Dry Creek	7.9	255	43	24	440	507	4.1
Firth Block	9.6	256	116	191	408	715	41.1
Northern Gully	12.62	463	234	358	599	1191	71.3
Southern Gully	3.9	235	56	325	235	616	60.9

Table 25: Summary of comparative assessment of stream values.

Table 5.2: Comparison of stream channel metrics for land exchange.

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

9.79 These tables show that there is a net gain in hydrological values within land owned by DOC, as a result of the proposed land exchange.

Comparative Assessment

9.80 The proposal will result in:

9.81 A net increase of approx. 10.2 ha of catchment area.

9.82 Longer streams i.e., 463 m compared to 265 m.

9.83 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., 1,682 m compared to 223 m.

9.84 An increase in the total length of streams and watercourses.

9.85 An increase in the areas of upstream catchments contributing flow. This will ensure more stable and resilient flows in the larger streams which form part of the exchange. and

9.86 The land exchange will provide hydraulic connections to several upstream catchments.

- 9.87 For the reasons set out above, the proposed change results in a net gain in stream length and catchment area within the DOC Estate.

Summary and Key Findings

- 9.88 From a hydrological perspective, the proposed land exchange offers a range of attributes and advantages to the conservation estate. The exchange will protect and provide access to a greater range of larger watercourses than exists at present in recognition of their the natural intrinsic values. It will also offer potential protection of the mid- and lower- reaches of some streams. This will enhance hydraulic connectivity of watercourses within the public domain.

Archaeology

Scope and Method

9.89 Clough & Associates Ltd prepared an archaeological assessment. The evaluation was undertaken to establish whether the proposed land exchange is likely to impact archaeological values. Research included a review of the New Zealand Archaeological Association (NZAA) ArchSite database, relevant archaeological and historical reports, early survey plans, and aerial imagery.

9.90 Limited visual inspections of the proposed land exchange properties have been carried out, the first on 25 November 2022 and the second on 27 June 2025. There are no recorded archaeological sites in the land exchange properties.

9.91 The archaeological value of sites relates mainly to their information potential, that is, the extent to which they can provide evidence relating to local, regional and national history using archaeological investigation techniques, and the research questions to which the site could contribute. The surviving extent, complexity and condition of sites are the main factors in their ability to provide information through archaeological investigation.

Table 26: Evaluation criteria and scoring index for Archaeology.

Archaeological value	Description	Scoring index
Condition	Refers to the state of preservation of a site or its features. This includes the extent of the site, the degree of its wholeness and intactness, and any previous modifications that would reduce its archaeological value through the loss of features. As well, better-preserved, more complex, and larger sites are more likely to yield significant archaeological evidence.	0 = Negligible 1= Very Low 2 = Low 3 = Moderate-Low 4 = Moderate 5= Moderate -High 6 = High 7= Very High
Rarity	These sites can provide information that is not usually available through archaeological investigation. Rarity can be based on the type of site, its date, or its uniqueness, with the latter referring to a site associated with a historical personage or event. All of these factors	
Information Potential	Reflects the site's research potential to provide new and/or substantial information through specialist scientific investigation. This is based on the state of preservation, the variety of features and elements present, and the degree of modification that has resulted in the loss of archaeological remains within the site. In general, a larger or more complex site has greater archaeological value based on its information potential.	
Context	This refers to the association of the site with other sites in the surrounding area, which make up an archaeological landscape. The value of a site can be increased as part of a larger group of sites through understanding past activities within a specific area and relationships between sites in a local and regional setting.	

Amenity Value	This refers to the elements of a site that contribute to the aesthetic, recreational enjoyment, and appreciation of visitors and the communities associated with the site.	
Archaeological Potential	Refers to the potential for archaeological sites/ values to be present for each of the proposed land exchange areas based on historical research, past land use and physical attributes.	

DOC-Give Area

9.92 No previously recorded archaeological sites are located within the DOC-Give area or in its immediate surroundings. Historical research indicates that the land containing the proposed OBDA was granted to early European settlers in the mid-19th century, with ownership recorded from the 1870s. No archaeological remains were identified during the survey. However, the report notes that the possibility of unrecorded subsurface remains associated with early European settlement cannot be entirely excluded.

DOC-Get Areas

9.93 The DOC-Get land, comprising Northern Gully, Firth Block, and Dry Creek, was granted to European settlers in the 19th century. No recorded archaeological sites are located within or adjacent to these areas, and no surface archaeological remains were identified during the field surveys. The assessment notes a 19th-century tramway associated with timber extraction may have passed through part of the Northern Gully property, as shown on a 1900 plan. The exact alignment could not be established, but as it is associated with pre-1900 activities, it would meet the definition of an archaeological site under the Heritage New Zealand Pouhere Taonga Act 2014 if any remains were present.

Results (Archaeology)

9.94 The findings of Clough & Associates Ltd (2025) are relied upon here and adopted in full.

Table 27: Results of the archaeological assessment using the assessment criteria contained in the Archaeological Assessment Report.

Site name:	DOC-Give	Firth Block	Northern and Southern Gullies	Dry Creek
Condition	Negligible (0)	Negligible (0)	Negligible (0)	Negligible (0)
Rarity	Negligible (0)	Negligible (0)	Negligible (0)	Negligible (0)
Information Potential	Negligible (0)	Negligible (0)	Negligible (0)	Negligible (0)
Context	Negligible (0)	Negligible (0)	Negligible (0)	Negligible (0)
Amenity Value	Negligible (0)	Negligible (0)	Negligible (0)	Negligible (0)
Archaeological Potential	Very Low (1)	Negligible (0)	Very Low (1)	Negligible (0)
Sum	Very Low (1)	Negligible (0)	Very Low (1)	Negligible (0)
Total Score: DOC-Give v DOC-Get	Very Low (1)	Very Low (1)		

Comparative Assessment

- 9.95 No archaeological sites have been recorded within either the DOC-Give or DOC-Get areas, and none were identified during field investigations. Both places are assessed as having low potential for archaeological material. The likelihood of archaeological remains is slightly higher in the proposed OBDA area due to its location within early European land grants, but the overall risk is considered very low.

Summary and Key Findings

- 9.96 The assessment shows that there will be **no net loss in the archaeological values** resulting from the proposed land exchange. No archaeological values were identified for any of the exchange areas, and Clough & Associates Ltd (2025) reverted to assessing the land exchange areas in terms of the archaeological potential of each area instead of the absence of other values. The isolated, difficult access, and rough terrain in each of the land exchange areas meant that the archaeological potential was negligible in the Dry Creek and Firth Block, very low in the Northern and Southern Gullies, and very low in the DOC-Give area. The archaeological potential of the DOC-Give area is rated very low, as it may contain surviving evidence of early 20th-century settlement.

Mana whenua

9.97 Winstone Aggregates recognises mana whenua of Te Awa Kairangi and Te Upoko-o-te Ika a Māui.

Taranaki Whānui ki te Upoko o Te Ika

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Ngāti Toa Rangatira

[REDACTED]

Summary (Comparative Assessment)

9.104 In accordance with the Act, the conservation values of both pieces of land have been described and compared here for:

Schedule 6, clause 23(1)

(a) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate:

Schedule 6, clause 24

(a) An assessment of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate:

This requires an assessment of 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 affected. This consideration forms part of the analysis by the Director-General of Conservation in their report under Schedule 6, Clause 26(1), and by the Panel under Schedule 6, Clauses 29(2) and 32(1).

9.105 Overall, this comparative assessment shows that the proposed land to be acquired by the Crown through the exchange process will result in a net benefit to the conservation estate across both ecological, hydrological and landscape value fields. While the proposed land exchange will not specifically provide a net benefit for the recreation, archaeological, and mana whenua fields, there will be no net loss of those conservation values to the conservation estate. Each discipline was assessed against consistent, transparent metrics derived from recognised guidelines and expert reports, confirming that the Crown-acquired land has higher cumulative conservation values than the land proposed for exchange by Winstone.

9.106 Based on the above evaluation tables, the conservation values of the DOC-Get and DOC-Give land can be compared.

9.107 The above table shows why the proposed exchange would benefit the conservation estate and details proposed improvement work to be done to provide a net conservation benefit. While archaeological and recreational values remain unchanged following the exchange, there is a net gain in both ecological and landscape values. When all four conservation values are considered together, it is clear that the proposed land exchange will result in a net benefit to the conservation estate.

Table 28: Summary of comparative assessment of conservation values.

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

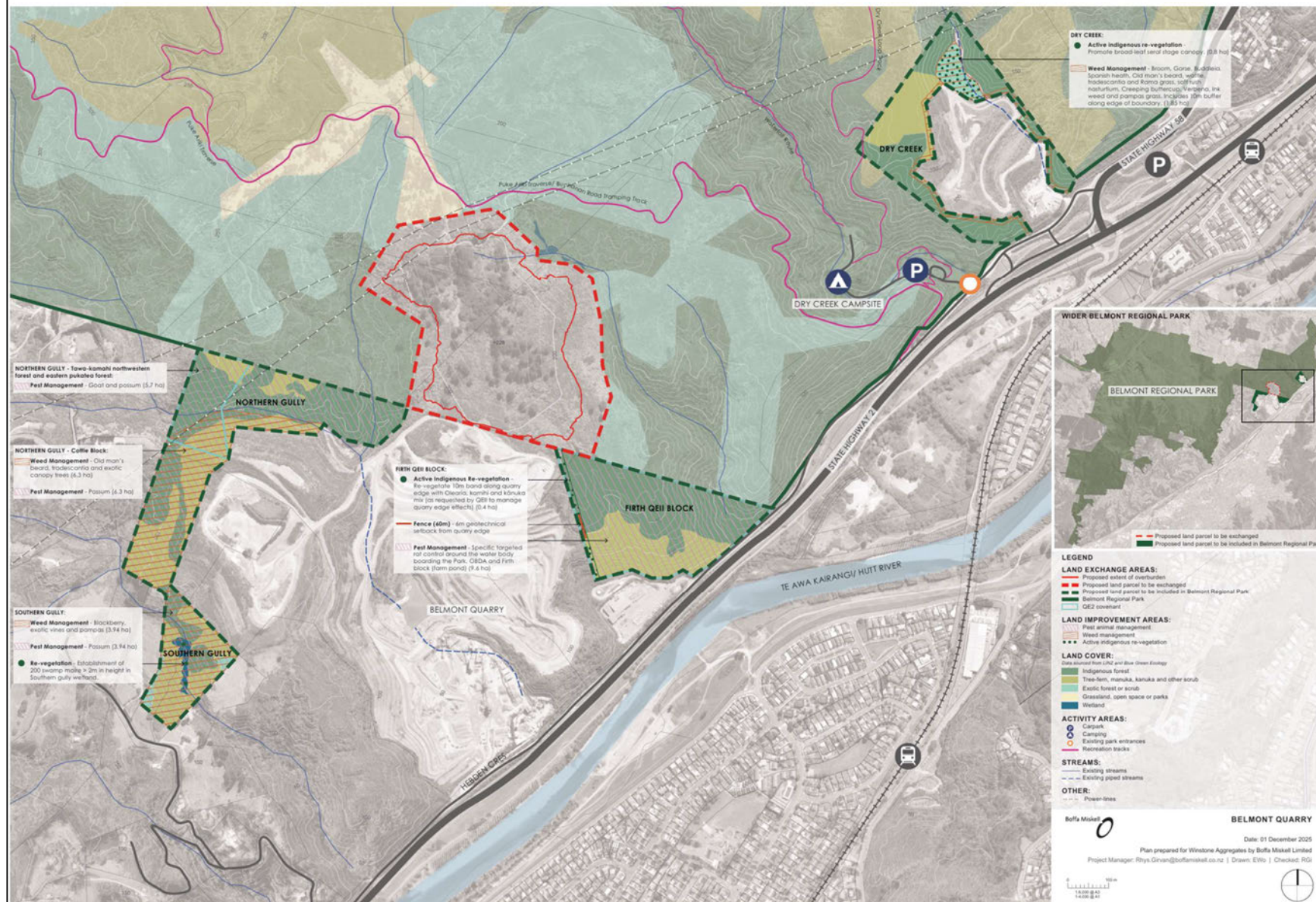
9.108 As provided in the discussion from paragraph 9.91, a comparative assessment of cultural values uses a Western framework and does not reflect how mana whenua understand their relationships with land and water. Cultural values are therefore not provided in Table 28. However, the cultural values assessment provided in Appendix B7 notes opportunities for enhancement that have directly informed and are included in the proposed improvements package at Section 10. Cultural values of the conservation estate are therefore maintained, as a result and provide opportunities for further engagement of mana whenua.

10.0 Improvements Package

Introduction

- 10.1 This section sets out details of improvement work to be done to provide a net conservation benefit, including how any money to be provided for improvements to the land could be spent, and the approvals of any person.
- 10.2 Clause 24(b) requires Winstone to provide details of any improvement works to be done to provide a net conservation benefit including how any money to be provided for improvements to the land could be spent. Improvements are considered as part of the Panel's overall determination as to whether the land exchange will enhance the conservation values of the land managed by DOC (Sch 6., Cl.29(2)).
- 10.3 The Panel can also impose conditions requiring the Applicant to undertake or bear the cost of that improvement work required to ensure that the exchange will enhance the conservation values of the land managed by the Department of Conservation as part of the conditions of exchange (Sch 6, Cl.32(1)(b)).
- 10.4 While the land exchange will provide a net conservation benefit without any improvement work being considered (as detailed in section 9 above), Winstone proposes to go further and provide the following improvement package (which has been recommended by its experts and in consultation with other stakeholders).
- 10.5 This has been designed to further enhance the conservation values of the land to be owned and managed by DOC. This package was developed by Winstone's during 8 months of close pre-lodgement consultation with DOC, that included expert workshops, sites visits, and feedback between ecologists from Winstone and DOC.
- 10.6 The following figures provided more details on the improvements package. Figure 11 outlines a land exchange concept plan of the improvements package and Figure 12 provides a table with further details.

BELMONT QUARRY LAND EXCHANGE CONCEPT PLAN



Subject area	Target species	Timeframes	Physical Works Required	Measurable objective or outcome
Northern Gully: northwestern forest and eastern pukatea forest	Goat and possum	Pest animal control was +carried out for 5 years post exchange.	- Installation of 11 x Flipping Timmy traps for possum control (2 per ha). - Goat eradication.	Natural regeneration of the under-canopy of the tawa-kamahi forest.
Northern Gully: Cottle Block	- Brushtail possum - Old man's beard (<i>Clematis vitalba</i>) - Tradescantia - Potential canopy trees	Weed and pest animal control carried out for 5 years post exchange	- Installation of 13 Flipping Timmy traps for possum control (2 per ha). - Drill and fill (established trees) or cut and paste (juvenile trees) any exotic woody tree species. 2 x rounds (Spring & Autumn) of OMB vine control work per year for 5 years. Hand pulling young vines and cutting and pasting established vines. - Knapsack spray any blackberry and pampas grass.	- Weed inventory map specifying the key management areas and species. -90% eradication of exotic weed species within the Cottle Block. - No exotic canopy tree species found within the Cottle Block
Southern Gully	Blackberry, exotic vines, pampas	Weed and pest animal control carried out for 5 years post exchange	Transfer of swamp maire from a cluster of seedlings in the park and potting up and growing on until of a size (1L) to transplant in to the southern gully wetland. Preparation of suitable sites and planting and management of those trees.	Establishment of 200 swamp maire > 2m in height.
Dry Creek	- Broom - Buddleia - Spanish heath - Old man's beard - Wattle - Tradescantia - Rama grass - nasturtium - Verbena - Pampas grass	Supplementary planting was carried out over 2 years for indigenous revegetation. Maintenance of planting areas is carried out for 4 years after the initial planting, with replanting carried out where required to achieve 90% establishment.	- Drill and fill large exotic trees (<i>Acacia spp.</i>) 2 x rounds (Spring & Autumn) of <i>C. vitalba</i> vine control work per year for 5 years. Hand pulling young vines and cutting and pasting established vines. - Knapsack spray exotic weed species within the weed management area. - Supplementary planting of 0.8 ha. An estimated 7000 plants	- 90 % Eradication of ecologically problematic weeds -Canopy closure, beginnings of natural ecological processes – natural regeneration in understory. - 90% establishment within the supplementary planting area.
Firth QEII		Planting is to be carried out within a year. Maintenance to take place for 4 years, with replanting where required to achieve 90% cover.	Planting of approximately 1000 kāmahī (<i>Pterophylla racemosa</i>), approximately 1000 <i>Olearia paniculata</i> and kānuka along the quarry edge.	Presence and abundance of weeds. 90% establishment within the quarry edge planting area.
	Rats	10 years	Establishment of a rat trap plan and execution of the plan aimed at seasonally reducing local rat numbers prior to the bird breeding season.	Rat abundance as measured by tracking tunnel monitoring is kept low

Improvement Works – Northern Gully

10.9 The extent of pest control proposed in the Northern Gully Tawa Kamahi Northwestern Forest and Eastern Pukatea Forest supports survival, propagation and distribution of seeds, seedlings, and saplings of all vegetation. Additionally, it protects the seed sources of later canopy trees including pukatea, tawa, hinau, swamp maire, and titoki, especially the slow developing later successional future canopy species (BlueGreen Ecology, 2025). Mana whenua views the Northern Gully improvement works as a way to strengthen cultural values through involvement in shaping weed and pest management programmes.

Improvement Works – Southern Gully

10.10 The addition of the Southern Gully land parcel to the exchange is a significant ecological gain. The proposed weed control improvements and commitment to establish 200 swamp maire in suitable wetland habitat responds to concerns of swamp maire loss. It ensures the land proposed for addition to the conservation estate is greater in area and holds higher ecological value than the land to be exchanged.

Improvement Works - Dry Creek

10.11 Blue Green Ecology (2025) note the management of plant pests will also have considerable conservation gains such that the establishing seral forests do not succumb to *Clematis vitalba* or other vines or matting ground tiers which can remove the viability and integrity of native vegetation areas.

Improvement Works - Firth QEII Block

10.12 Blue Green (2025) notes targeted rodent control around the farm pond increases the ability of nesting bird species to succeed, and even one successful nest of an at-risk or threatened species represents a significant conservation gain. The same rat control reduces predation on gecko and skink present, which may boost local populations of ngāhere gecko and further enhance conservation values at the Firth Block.

Improvement Works – Ecological Restoration Plan

10.13 The Ecological Restoration Plan responds to mana whenua direction by integrating mātauranga Māori with ecological science to support how Taranaki Whānui strengthen their relationship and whakapapa to the area. This approach aligns pest plant management, indigenous restoration, wānanga and educational activities. The Cultural Values Assessment (2025) noted that legal tenure of land may change the relationship of mana whenua to whenua, wai, and wider landscape. This improvement demonstrates the partnership between Winstone and Taranaki Whānui and a commitment to enhance their cultural values and connection to the conservation estate into the future.

Conclusion

10.14 The improvement package meets the requirements of Clause 24(b) by identifying the specific works proposed to deliver a net conservation benefit and demonstrating how investment in the improvements works will be directed to achieve measurable outcomes. The package sets out defined pest control, weed control and restoration activities, together with the timeframes within which they will be delivered, allowing the Panel to assess enhancement of conservation values under Clause 29(2) and to frame any conditions under Clause 32(1)(b). While these improvements are not necessary for the exchange to achieve a net conservation benefit, Winstone has proposed an improvement package that will further enhance the conservation values of the land to be owned and managed by DOC following the exchange.

11.0 Assessment of anticipated and known adverse effects of the project on the environment (AEE)

- 11.1 The following assessment addresses the anticipated and known environmental impacts of the project. This is a requirement of FTAA 2024 ss 13(4)(h) (via ss 43(2) and 33(1)(b)(i)), because the land exchange is a component of a listed project.
- 11.2 This report is not required to describe all anticipated and known adverse effects of the total Belmont Quarry Development Project on the environment. It is only such effects that are 'relevant to the land exchange' that are required under s 33(1)(b). The only effects relevant at this stage are those caused by the land exchange itself. The effects of the development of the new OBDA and associated works (such as noise, dust, and geotechnical effects arising from the OBDA) will be assessed at a later stage, when the applicant lodges its substantive application for fast-track approvals, including resource consents, subdivision consents, archaeological approvals, and wildlife approvals.
- 11.3 The effects that are relevant to the land exchange approval are those that arise from the change in the ownership and status of the land parcels following the exchange, by reason of either:
- i. The ownership of the land changing from the Crown to Winstone Aggregates, or vice versa;
 - ii. The DOC-Get areas being held for specified conservation purposes after the exchange as required by schedule 6, clause 34(2) of the Act; or
 - iii. The DOC-Give areas are no longer subject to a reserve classification after the exchange.
- 11.4 The adverse effects on the environment that are relevant to the land exchange itself are very limited in nature, because the land exchange results in a change in ownership and legal status of the land parcels and does not authorise any physical works. The legal interests on the land parcels, including easements and covenants, will remain following the exchange (bar the HCC encumbrance that will be discharged). There are, however, a limited range of adverse effects that may arise from the land exchange itself, which are detailed in the following paragraphs.
- 11.5 **Recreation:** the change in ownership from the Crown to Winstone will mean the loss of public access to a 400 m utility track. That loss has been assessed as immaterial by Greenaway & Associates (see Appendix B4).
- 11.6 **Mana whenua:** the land exchange will alter legal tenure (freehold ownership) but does not diminish the enduring relationship of mana whenua with the Belmont landscape. Cultural values will remain present across the land and are proposed to be enhanced through improvement works involving mana whenua.
- 11.7 **Ecology:** There are no adverse effects on ecology or ecological values as a consequence of the land exchange, as the change in land ownership and status does not result in any physical change to the land's features. Any effects on

ecological values will result from the OBDA works (Substantive Application) rather than the land exchange and will be managed through conditions on those approvals.

- 11.8 **Landscape:** There are no adverse effects on landscape or landscape values as a consequence of the land exchange, as the change in land ownership and status does not result in any physical change to the land or its features. Any effects on landscape values will result from the OBDA works (Substantive Application) rather than the land exchange and will be managed through conditions on those approvals.
- 11.9 In conclusion, the proposed land exchange in itself will not result in any effects on the environment that are more than minor. The effects of the development of the OBDA and associated works, and conditions to manage those effects, will be assessed at a later stage of the fast-track process when Winstone Aggregates lodges its substantive application for other approvals.

12.0 Crown liabilities associated with the exchange

- 12.1 This section outlines the potential financial, legal, and practical liabilities that the Crown may incur as a result of the proposed land exchange.¹⁶
- 12.2 This section sets out information about financial and legal liabilities and obligations associated with the land to be acquired by the Crown.

Financial and legal liabilities and obligations for Crown [Schedule 6 Clauses 24(d), 26(1)(b)]

- 12.3 Schedule 6, clause 24(d) requires the applicant to provide information about *“financial and legal liabilities and obligations associated with the land to be acquired by the Crown”*. The DOC report must then include information about the financial implications for the Crown of the land exchange (sch 6, cl 26(1)(b)).
- 12.4 There are very limited financial and legal liabilities and obligations associated with the DOC-Get areas in the land exchange. The relevant liabilities that the applicant is aware of are as follows.

QEII Open Space Covenant

- 12.5 Parts of the Firth QEII area and Northern Gully area are subject to QEII open space covenants. This imposes obligations on the owner of the land regarding which activities may take place on it and requires the owner to allow the QEII National Trust access to the land on reasonable notice. As the DOC-Get area will be held for conservation purposes following the exchange, the obligations under the QEII Open Space Covenant are unlikely to have any material impact on the Crown’s use and enjoyment of the land.
- 12.6 The QEII open space covenant can also impose an obligation on the owner of the land to install stock-proof fencing on the boundaries of the covenant area. However, to date this has not been required as stock have not been able to access this area, the future need for this is this is considered unlikely.
- 12.7 DOC has been provided with copies of the QEII covenant and confirmed that it is prepared to assume those responsibilities.

Record of title interests

- 12.8 Part of the Firth QEII area is subject to encumbrance in favour of Hutt City Council, for the protection of vegetation on the land. This same land also falls within the QEII Open Space Covenant and is therefore unlikely to impose any additional obligation on the landowner. Hutt City Council have confirmed that they agree to the removal of the encumbrance, and that process is underway.
- 12.9 Part of the Dry Creek Cleanfill area has a right of way in favour of the adjacent public land. As the adjacent benefited allotment is Crown-owned land forming part of Belmont Regional Park, the right-of-way will become immaterial after the land

¹⁶ Clauses 24(d) and 26, Schedule 6, FTAA 2024

exchange, as the Crown will hold both lots. DOC has confirmed this can remain and is not affected by the exchange.

Contaminated Land

- 12.10 Given the historic use of the land for quarrying, contaminated land has been assessed to confirm whether any of the parcels proposed for exchange contain contamination that could create future Crown liability.
- 12.11 Pattle Delamore Partners (PDP) were engaged by Winstone Aggregates to complete contaminated land assessments for the Belmont Quarry land exchange. This work involved two components. PDP prepared a preliminary site investigation for the Belmont Quarry parcels at Firth Block, Northern Gully and Southern Gully, and a separate preliminary and detailed site investigation for a portion of the Dry Creek area.
- 12.12 PDP (27/11/25) presents a PSI for the Firth Block, Northern and Southern Gullies, as well as a DSI (12/09/25) for Dry Creek. The key outcomes of those two reports are presented below.
- 12.13 **Northern Gully block:** The Northern Gully has historically received cleanfill from other parts of the site. PDP (2025) conclude that *'this material is unlikely to have contributed to soil contamination within the Northern Gully'*.
- 12.14 **Firth block:** PDP (27/11/25) presents a PSI for the Firth Block. Historical aerial photography shows that the site has been subject to extraction and overburden placement activities. The northwestern portion of the Firth Block (approx. 1925 m²) falls within the SLUR delineation for the property. The review of historical information and site walkover indicate that it is more likely than not that no HAIL activities have been undertaken at Firth Block.
- 12.15 **Dry Creek block:** PDP were engaged to undertake a PSI and a DSI of the upper portion of Dry Creek in support of the land exchange with DOC. Dry Creek was physically worked until clean fill placement concluded in 2019. The site is then revegetated and has remained so to the present day. A Cleanfill Management Plan (CMP) on the file allowed for the filling of clay, soil, rock, asphalt, brick or concrete (including reinforcing steel). A site walkover and soil sampling were undertaken. Analytical results were generally comparable across the site with no exceedances against the applicable criteria. Low-level detections of hydrocarbons may be consistent with observations of asphalt within the fill material. No asbestos was identified in the analysed samples. The information review and soil testing did not identify evidence that HAIL activities have occurred at the site, and therefore, the NES for Assessing and Managing Contaminants in Soil does not apply. The limited site investigation work undertaken did not identify the presence of material beyond that allowed for in the CMP.
- 12.16 **Southern Gully:** PDP (2025) undertook a review of publicly available data, concluding that it is unlikely that Southern Gully is contaminated. The northern part of the Southern Gully has historically received cleanfill from other parts of the site. PDP (2025) conclude that *'this material is unlikely to have contributed to soil contamination within the Southern Gully'*.

- 12.17 Overall, any liabilities and obligations arising from contaminated land issues are considered to be immaterial.

Natural hazards (Stability)

- 12.18 To assess Natural hazard, risk including the geotechnical stability of the DOC-Get areas, Winstone has commissioned a report from Baseline Geotechnical (2025).
- 12.19 That report has concluded that localised slope hazards could impact tracks or informal access but are not significant for conservation land use. No significant geotechnical impediments to the land exchange. Risks can be managed with standard conditions including a fencing condition for 60 m part of the quarry pit interface with Firth Block, which Winstone proposes to be undertaken as a pre-exchange action
- 12.20 **Public safety:** Firth Block remnant batters present the only notable hazard requiring management; Dry Creek and Northern Gully are stable enough for recreation and conservation.
- 12.21 **Dry Creek:** Based on the report undertaken by Baseline Geotechnical Ltd (2025), slope stability hazard in this proposed land exchange parcel is limited to very localised areas of old access roads, and the risk to persons and conservation values is negligible.
- 12.22 **Firth Block:** Remnant quarry batters make up a portion of the Firth Block land proposed to be used as part of the land exchange. Baseline Geotechnical Ltd (2025, have confirmed there is limited slope instability hazard in this proposed exchange parcel, and there is a negligible risk to persons and to conservation values.
- 12.23 **Northern Gully:** The proposed Northern Gully land exchange parcel comprises: A) natural, unmodified slopes that show no evidence of significant instability, and B) rehabilitated OBDA slopes that are designed to achieve acceptable levels of stability. There is a limited slope instability hazard in the proposed exchange parcel, with negligible risk to persons and conservation values.
- 12.24 **Southern Gully:** Since the construction of this section of the Cottle OBDA was completed in 2015, the site has been rehabilitated and revegetated. There has been no instability observed in final slopes within the Cottle OBDA since construction commenced in the mid-2000s. Based on Baseline Geotechnical (2025), there appears to be limited slope instability hazard in this proposed exchange parcel, and there is a negligible risk to persons and to conservation values.
- 12.25 Overall, any liabilities and obligations arising from geotechnical issues are considered to be immaterial.

Financial evaluation of land [sch 6, cl 31(1)(c)]

- 12.26 This section sets out the financial value of the land proposed to be acquired by the Crown.
- 12.27 A financial evaluation of the proposed exchange land has been undertaken and is presented in the *Valuation Report Proposed Land for Exchange* (Colliers,

26/08/2025 (Revised 5/12/25)). The findings of Colliers (2025) are relied upon here and adopted in full. Colliers (2025) sets out the land values as follows.

Table 29: Land valuation by Block.

DOC-Give	DOC-Get			
	Firth Block	Northern Gully	Dry Creek	Southern Gully
\$428,000	\$105,000	\$195,000	\$95,000	\$144,000
	\$539,000			

- 12.28 With respect to the proposed land exchange, the market value conclusions from Colliers (2025) above indicate an aggregate value of DOC-Get Land is \$539,000 compared with \$428,000 for DOC-Give Land. From a valuation perspective, this indicates a \$111,000 dollar valuation difference, with the DOC-Get land exceeding the value of the DOC-Give land.
- 12.29 As a consequence of the above valuation, there is no need for a payment of money from Winstone to the Crown to offset any inequality in market value (Sch 6, Clause 31(1)). The Act is clear that the Panel cannot impose a condition on the Crown to pay any money to offset the inequality in market value (Sch. 6, Clause 31(2)).

How the project would be affected by climate change and natural hazards (s 13(4)(v))

- 12.30 As a result of climate change, the project area is expected to be subject to more frequent and intense extreme weather events, with rainfall projected to increase by 35% under the RCP 8.5 M climate change projection (Awa Environmental Ltd, 2025). As the project area is situated across a landscape of steep ridgelines, rolling slopes, and incised gullies, the primary risk arising from more frequent and intense extreme weather events is erosion and slope instability within the proposed exchange areas. The impact of climate change on the DOC-Get areas is assessed within the Flood Risk Assessment Report (Awa Environmental Ltd, 2025). The effect of sea level rise is not relevant to this location, given the parcel's elevation and location.
- 12.31 A preliminary geotechnical investigation was carried out on-site by Baseline Geotechnical, with the results used to inform the alignment and shape of the proposed OBDA. This information ensures that the OBDA will be placed on suitable ground that is not subject to instability, thereby mitigating the potential effects of climate change and natural hazards. Furthermore, the OBDA will be designed and installed in accordance with Baseline Geotechnical Ltd (2025) to ensure long-term stability.
- 12.32 This assessment is supported by the Geotechnical Appraisal Report (Baseline Geotechnical Ltd, 2025), which found that the slope stability hazard within DOC-Get

Land is no greater or significant than what is present within the surrounding areas of the Belmont Regional Park.

Health and safety risks [Schedule 6, Clause 26(1)(d)]

- 12.33 This section outlines the health and safety considerations at the interface between Belmont Quarry and the land proposed to be transferred to the Department of Conservation. It sets out how risks to public users of Belmont Regional Park will be managed once new operational boundaries are established, drawing on current practice across the quarry sector.
- 12.34 Winstone Aggregates (Appendix B15)¹⁷ sets out a risk management framework for the health and safety (H&S) of the public using Belmont Regional Park to the north, east, and west of the Belmont Quarry. The potential risks associated with an active quarry include unauthorised entry, heavy vehicle movement, blasting, unstable slopes, dust, noise and vibration. These risks are already managed through the Quarry Management Plan, site safety procedures, and the planning framework that requires buffer strips, screening and clear delineation of the operational footprint.
- 12.35 Existing boundaries between the quarry and Belmont Regional Park are clearly defined through fencing, signage, vegetation buffers and controlled access points. The land exchange will create new boundaries along the Firth Block, Dry Creek, Northern Gully and Southern Gully. In order to manage the potential H&S risks to an acceptable level, Winstone (Appendix B15) proposes to maintain signage, access management, vegetation and natural buffers, in coordination with DOC and Council with regard to public access. Winstone will continue to manage risks through the Quarry Management Plan and standard operational controls, maintaining fencing, buffers, signage, and access management as appropriate to protect public safety. On that basis, the interface with public land can continue to be managed safely and does not introduce new risks.

Practicality of ongoing management [Schedule 6, Clause 26(1)(c)]

- 12.36 The land proposed for addition to the conservation estate is largely in a natural or regenerating state, and its terrain and access are consistent with other parts of Belmont Regional Park. Accordingly, the ongoing management and maintenance burden on the Crown is anticipated to be low.
- 12.37 It is understood that after the post-exchange, the land will be managed by DOC as DOC-owned reserve land. The Panel and Minister of Conservation will specify the conservation purposes for which the DOC-owned reserve land is to be held when they give a notice in the *Gazette* under schedule 6, clause 34.
- 12.38 As part of the exchange, Winstone has proposed a comprehensive improvement package, which will provide significant weed, pest control, and planting. This is expected to minimise the actions required to manage the land.

¹⁷ Winstone Aggregates (3/12/2025) *Interaction Between Belmont Quarry Operations and neighbouring land*. 5 pages.

Will the exchange result in an enclave of private land within Crown-owned land [Schedule 6 Clause 26(1)(c)]

- 12.39 The report prepared by DOC is required to include information on “whether the land exchange would result in an enclave of private land within a conservation area or a Crown-owned reserve.”
- 12.40 The proposed exchange will not create any enclave of private land within a conservation area or Crown reserve. The parcels proposed for exchange are contiguous with existing regional park land and quarry operations, ensuring logical boundary realignments and continued public access continuity.
- 12.41 The DOC-Give and DOC-Get land already adjoins both the existing Belmont Quarry and the Regional Park, which is a Crown-owned reserve; it therefore extends the area of conservation land in this area.

Costs of managing land

- 12.42 The cost of managing the land to be acquired is expected to be comparable to similar areas within the regional park. No specialised or intensive management regimes are required, and routine park management practices will be adequate.
- 12.43 The DOC-Get areas are ‘not considered to present a significant whole slope instability risk, and the localised instability risk to persons accessing these areas and to conservation values is considered to be negligible’.¹⁸
- 12.44 Under a climate change scenario, the wider environment is expected to experience a 35% increase in rainfall, which would apply equally to both the DOC-Get and DOC-Give land, meaning that the DOC-Get land is no more exposed to climate-related risk exposure than the wider Belmont Regional Park.¹⁹
- 12.45 All DOC-Get Blocks contain surface water drainage (river) catchments, which are shown in figure 2 of Awa Environmental (Appendix B14) report. The flood flows within the parcels proposed for exchange were found to be ‘similar to what would be expected in streams across the Belmont Regional Park’.²⁰ Therefore, the management cost is comparable between DOC-Give and DOC-Get.
- 12.46 Winstone will undertake the cost of pest plant and pest animal control on DOC-Get Land as specified in the proposed improvement package.

Rates

- 12.47 There is unlikely to be any rating liability associated with the DOC-Get areas. Those areas are non-rateable land because they are described in item 1 of Schedule 1 to the Local Government (Rating) Act 2002. The DOC-Get areas may be rateable for

¹⁸ Baseline Geotechnical (Appendix B12), sections 4.3.2, 4.4.4, 5.4, 6.4, 7

¹⁹ Awa (27/08/2025), section 2.4.1.

²⁰ Awa (27/08/2025), sections 2.1, 2.2, 2.3.

a targeted rate set solely for water supply, sewage disposal or refuse collection services provided to the land (Local Government (Rating) Act 2002, s 9). However, it is unlikely that any such services will be provided to the DOC-Get areas, and so liability for targeted rates appears very remote.

13.0 Proposed conditions on land exchange approval

- 13.1 This section outlines the mechanics of the land exchange, pre-conditions (actions to be taken prior to the exchange of land to prepare for Gazettal) and conditions of the exchange (cl.31 and cl.32 schedule 6).

Isolating the titles in readiness for the exchange

- 13.2 Various options exist for preparing the individual titles in readiness for the land exchange: this can be done using a combination of the process in s11(1)(cb) RMA and by obtaining a subdivision consent.
- 13.3 The land currently owned by Fletcher Concrete and Infrastructure Limited that is being acquired by the Crown on exchange (DOC-Get) may be exempt from needing a subdivision consent Winstone may be able to utilise the process in s11(1)(cb) RMA to transfer its land to the Crown. However, taking a cautious approach to the scope of s 11(1)(cb), Winstone will apply for subdivision consent for the DOC-Get land.
- 13.4 Winstone also will need to obtain a subdivision approval to subdivide the DOC-Give land (the future OBDA) to give effect to the exchange. Subdivision consent for the DOC- Get land will be sought by Winstone as part of Winstone's substantive FTAA application in its suite of RMA consents for the Belmont Quarry Development. That subdivision consent will be structured in the following way:
- i. **Stage 1** will subdivide the Belmont Quarry site, to form new lots over Firth Block, Northern Gully and Southern Gully areas for the land exchange (DOC-Get land) separating these from the existing parent titles owned by FCIL.
 - ii. **Stage 1A** will subdivide the Dry Creek site owned by FCIL to form a new lot for the land exchange known as "Dry Creek" DOC-Get area.
 - iii. **Stage 2** subdivide the Crown land to create a new lot consisting of DOC-Give land known as the proposed OBDA and amalgamate this title into the existing Quarry title (new Lot 7).
- 13.5 A copy of the proposed scheme plan for the proposed subdivision is located at **Appendix B10**.

Proposed Draft Pre-conditions for land exchange (cl.31 sch.6)

- 13.6 To prepare the land for exchange, the following draft pre-conditions are proposed under schedule 6, clause 31:
- (1) *The Minister or his delegate acting reasonably to review and approve the survey plan prepared by the Applicant to define the exchange land within 20 working days of receiving the plan.*
 - (2) *The Applicant obtaining (on terms satisfactory to itself and the Minister of Conservation or his delegate) all consents and approvals required to separately define the Applicant's land and to enable ownership of Fletcher Infrastructure and Concrete Limited's land to be transferred to the Crown. The Applicant's land will be provided free of all encumbrances and interests, except for the following interests that must remain in place and brought down into 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. *Encumbrance for Vegetation Protection Part Lot 1 DP22561 (Creating document 9032630.1);*
- c. *Right of way over Part Lot 1 DP 28205 (Creating Document 701267); and*
- d. *Easement in Gross -Quarrying effects, shown on Lots 4,5 and 100DP322126, burdened land Lots 4,5 &100 DP 322126 (creating document 583385.5)*

and vested as a reserve subject to the Reserves Act 1977 [with the reserve classification to be consistent with the classification specified by the Panel].

- (3) *The Applicant obtaining (on terms satisfactory to itself) and the Minister of Conservation or his delegate) all consents and approvals required to separately define the Reserve land and to enable ownership of the Reserve land to be transferred to the Applicant as fee simple land. The Crown land will be provided free of all encumbrance and interests and without a reserve classification.*
- (4) *In preparing the land for exchange the Applicant must install 60m of fence set back 6m from the Firth Block pit face in the location shown on Drawing W15069_Land_Exchange_Concept Boffa Miskell 1 December 2025.*
- (5) *Obtain full discharge/withdrawal of Encumbrance for Vegetation Protection Part Lot 1 DP22561 (Creating document 9032630.1) and necessary approval of Hutt City Council.*
- (6) *For avoidance of doubt all costs associated with complying with conditions 1-5 shall be met by the Applicant.*
- (7) *Winstone shall register the appropriate easements as shown on Scheme Plan SC-02 (Appendix B10a) including but not limited to:*
 - a. *Easement Z (Right of Way) for the purpose of conservation activity and maintenance undertaken by DOC or its agents. The Grantee 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 access is expressly excluded unless otherwise agreed in writing by the Grantor. The Grantee 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.*

Draft Proposed Conditions (Cl.32 Sch.6)

13.7 To prepare the land for exchange, the following draft conditions are proposed under schedule 6 clause 32:

1. *The land being given by the Crown by way of exchange will be subject to no reservation, classification, interest or encumbrance.*
2. *The Applicant'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 Gazette Notice and brought down into 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 DP 28205 (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 DP 322126 (creating document 583385.5)*
3. *The Applicant is required to undertake the following improvement works for a period of 5 years as part of ensuring that the land exchange will enhance the conservation values:*
 - a. *Northern Gully:*
 - i. *Undertake 5.7 ha of Pest animal management (goat and possum) control in the Northern Gully Tawa-Kamahi Northwestern Forest and Eastern Pukatea Forest.*
 - ii. *Undertake 6.3 ha of weed management of old man's beard, tradescantia and exotic canopy trees and pest management (possum) in the Northern Gully Cattle Block.*
 - b. *Southern Gully*
 - i. *Undertake 3.6 ha weed control, and plant swamp maire, in the Southern Gully block.*
 - c. *Dry Creek*
 - i. *At Dry Creek, undertake weed control over an area of 1.85 ha, and replanting of native species over an area of 0.80 ha.*
 - d. *Firth QEII Block:*
 - i. *Undertake 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.*
4. *The Applicant is required to undertake the following works:*
 - a. *Active indigenous re-vegetation of 10m band along quarry edge with Olearia, kamihi and kanuka mix (as requested by QEII National Trust) to better manage quarry edge effects and agreed by Winstone.*
5. *The Applicant shall develop an Ecological Restoration Plan. The purpose of the Ecological Restoration Plan is to detail how compliance with Conditions 3 and 4 are achieved. The ERP shall address as a minimum:*
 - a. *A maintenance plan for all new planting.*
 - b. *Defined funding allocations and timelines.*
 - c. *Annual reporting for the first five years.*
 - d. *Methods and specifications as to how the improvements listed in (3) and (4) are to be achieved.*
6. *The Ecological Restoration Plan shall be developed and implemented in consultation with Taranaki Whanui ki te Upoko o Te Ika and integrate mātauranga Māori measures alongside ecological science to guide monitoring and restoration. Design and implementation of the ERP may facilitate a pest plant management programme at Dry Creek to restore indigenous vegetation, opportunities for wānanga and*

educational activities alongside restoration efforts, and the opportunity to ethically harvest fallen Swamp Maire materials for cultural practices.

14.0 Other matters

Previous decisions on the Belmont exchange project [s 13(4)(u)]

- 14.1 Winstone has previously obtained resource consents and certificates of compliance for various activities at Belmont Quarry. These approvals, granted between 1998 and 2025, include consents for a truck stop facility, cleanfill tipping, concrete plant relocation, overburden disposal, vegetation removal, film set construction, and traffic movement compliance. Importantly, none of these historical consents relate directly to the land exchange proposed in this application. All existing consents and certificates listed below have been granted and given effect to.

Table 30: District Consents held at Belmont Quarry.

Consent Number	Description	Decision Date
Hutt City Council Consents		
RM980430	To Install and Operate a Truck Stop Facility	25/07/1998
RM980224	To Establish a Cleanfill Tip within the Dry Creek Quarry	7/08/1998
RM990444	Relocation of Concrete Plant at Old Dry Creek Quarry	30/07/1999
RM990666	Construct Temporary Film Sets	26/06/2000
RM060176	Certificate of compliance to dispose of Overburden Material and Associated Bush Clearance	7/09/2006
RM070245	To construct a New Overburden Disposal Area (OBDA) for disposal	02/09/2008
RM110285	Certificate of Compliance for Disposal of Quarry Overburden 1,500,000m ³ and Associated Vegetation Removal.	29/09/2011
RM110286	Certificate of Compliance for Quarry Expansion Outside of Vegetation Protection Areas.	17/11/2011
RM110304	Removal of 846m ² of Protected Vegetation.	13/01/2012
RM120101	Change to Condition 1 RM110304 - Alter Location of Track	8/05/2012
RM130226	Change of Condition 5 RM110304 to Remove Requirement for Mitigation Planting.	6/08/2013
RM160204	Certificate of compliance for GBC Winstone activities at 178-178 Liverton Road, 401, 541 Hebden Crescent and 560 Western Hutt Road, Kelson	18/01/2016
RM200464	Resource Consent for an Asphalt Plant	20/12/2023
RM240368	Certificate of Compliance for Traffic Movements Associated with the Ongoing Operations of Belmont Quarry	5/05/2025
Greater Wellington Regional Council Consents		
WGN070237	To construct a new overburden disposal area (OBDA) to dispose of 1.3 million m ³ of overburden material from Winstone Aggregates Belmont Quarry on the neighbouring Cottle Land. Application made in conjunction with HCC consent RM070245	02/09/2008
WGN140208	To undertake activities associated with the operation of and extension to Belmont Quarry.	11/02/2015

WGN180050	Deposition, discharges and activities associated with the 2.5-hectare expansion of the Cottle Block OBDA.	24/11/2017
WGN180050 (s127)	Change of conditions to modify the Cottle block OBDA site to increase the quantity of overburden that can be placed there. Requiring the reshaping of the OBDA by increasing the height and shape of the overburden area.	12/06/2019
WGN240139	To undertake soil disturbance activities and to dispose of overburden material and process water fines, including the discharge of sediment-laden water to land where it may enter water, associated with the continued operation of the overburden disposal area at Belmont Quarry.	27/06/2025

- 14.2 The previous consents authorising the development and continued operation of the Cottle Block OBDA, located on Lots 4 and 5 DP 322126, are substantially the same activities as those that would be involved in the Belmont Quarry Development Project if the application were to be processed under the RMA 1991. However, the Cottle Block OBDA is in a different area from the OBDA that is proposed as part of the Project under consideration in this process.

Previous decisions

- 14.3 Winstone has made earlier attempts to use the Park land for overburden disposal. These took the form of low-level informal discussions which were not progressed. Details are included for completeness and background and do not amount to a “previous decision” for the purposes of s13(4)(u) of the Act.
- 14.4 In 2017, Winstone approached GWRC to explore whether it was possible to obtain a lease or license under the Reserves Act 1977 for dispose overburden within the Regional Park. Greater Wellington received advice that obtaining a lease or licence for this activity, in the Park was not legally possible under the Reserves Act 1977.
- 14.5 Winstone then made a submission on the Bemont Regional Park Management Plan review process seeking to relax provisions in the plan that prohibited mining quarrying and commercial earthworks in the park to allow for overburden placement. This was unsuccessful.
- 14.6 It was later discovered GWRC did not own the land, and that the land was owned by DOC.
- 14.7 Winstone approached DOC about a possible land exchange in 2017 under s 15 of the Reserves Act 1977. This did not progress to a formal application or decision on the exchange. Discussions were interrupted by the Supreme Court decision in *Hawke’s Bay Regional Investment Co Ltd v Royal Forest and Bird Protection Society of New Zealand* [2017] NZSC 106 in which the Court was critical of DOC’s approach to land exchanges.
- 14.8 Early pre-application indication from DOC staff considering the potential for an exchange under the Reserve Act 1977 (at that time) was that DOC was only prepared to consider exchange of land with low values/no longer needed for Park purposes. Winstone disagreed with this approach, but chose not to advance to a formal application.

- 14.9 Another informal approach was made by Winstone to DOC in 2022 in response to growing pressure caused by lack of overburden disposal options at the quarry and at the insistence of GWRC that Winstone thoroughly explore alternatives. DOC confirmed it was only prepared to consider land of low ecological value for exchange. Again, no formal application was made.
- 14.10 The Fast-track Approval Act 2024 included provisions for land exchanges, which altered the statutory criteria and tests for exchanges of reserve and conservation land for listed fast track projects.
- 14.11 This is the first time Winstone has made a formal application for a land exchange.

Compliance and or enforcement actions taken against the applicant [s 13(4)(x)]

- 14.12 Hutt City Council has not undertaken any enforcement action against Winstone at Belmont Quarry. The site operates in compliance with its existing consent conditions and environmental obligations.
- 14.13 Greater Wellington Regional Council has not undertaken any enforcement action against Winstone Aggregate. A request for Information regarding the compliance history of Belmont Quarry was made to the Council on 12 August 2025. Council records show that low-risk (technical) non-compliance with condition 45 of the bundled water take permit under WGN140208 occurred during 2017/18, 2022/23, 2023/24 and 2024/25. To prevent further non-compliances and in accordance with GWRC requirements, Winstone installed a telemetry system on the water meter (NZTM: 1764262.5440690) and provided confirmation of that installation to GWRC in June 2023. Water meter readings are now managed through the online portal *ManageMyWater*, with GWRC granted full access to real-time data. Additionally, Winstone receives monthly reports from the system summarising total water usage for the year, enabling close monitoring. Site staff have reduced pump operating frequency and implemented improvements to the water treatment plant to increase recycled water usage, thereby reducing reliance on freshwater.
- 14.14 Council records also show low-risk (technical) non-compliance with the conditions of WGN180050 occurred in 2019/20 and 2020/21 due to Winstone failing to meet all conditions. The 2019/2020 technical non-compliance was due to the late submission of a Stream Loss Mitigation and Maintenance Report, which was due in January 2020 but was submitted only in May 2020. No issues were raised with that report after it was submitted. Winstone does not have any further information on the details of the 2020/2021 non-compliance, and no data is available in Council's records.
- 14.15 The Department of Conservation has not undertaken any enforcement action against Winstone under the Wildlife Act 1953.

Are there any relevant rights of first refusal [Schedule 6, Clause 23(1)(d), (e). Clause 24(e)]

- 14.16 The proposed exchange would not trigger a *right of first refusal* or a *right of offer or return* under applicable Treaty Settlement legislation.²¹

Does the project involve any ineligible activities [s 13(4)(c)]

- 14.17 The exchange application does not include any 'ineligible activities' as defined in s 5 of the FTAA. While the exchange application relates to land that is a Crown-owned Reserve under the Reserves Act, the reserve is managed by the local authority, Greater Wellington. Therefore, there is no issue about the reserve being vested in or managed by someone other than DOC or a local authority arises (s 5(1)(j) and (k)).

Does the project involve any RMA Prohibited activities [s 13(4)(i)]

- 14.18 This section provides a statement of any activities involved in the project that are prohibited activities under the RMA 1991.²² This provides a planning assessment of the planning hierarchy from NES, Regional Plans, and District Plans. This assessment identified rules with prohibited activity status for each instrument. Only one of those rules with a prohibited activity status applies to the project, while the remainder do not.
- 14.19 The following is a planning assessment of operative rules and regulations (NES) that have a prohibited activity status and have been considered in their application to the substantive proposal. The outcome of this assessment is that the regulations of the NES-F and the rules of the ODP, and PDP with a prohibited activity status, do not apply to the Substantive Application. There is one rule from the NRP PC1 (rule WH.R13) which has a prohibited activity status and is applicable to the proposal. This is discussed in the table below.

Table 31: Assessment of all regulations and rules with a prohibited activity status.

Instrument	Reference	Descriptor
Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011	N/A	The NES-Soil does not contain any regulations with a prohibited activity status.
Resource Management (National Environmental Standards for Air Quality) Regulations 2004	Regulations 4-12	NES-AQ Regulations 4 through 12 prohibit the burning of various materials. That is not proposed here. The NES-AQ prohibitions do not apply.
Resource Management (National Environmental	Regulation 53	Drainage of a natural inland wetland, not otherwise provided for in other regulations.

²¹ Clause 23(1), Schedule 6, FTAA 2024.

²² s 13(4)(i), FTAA 2024.

Instrument	Reference	Descriptor
Standards for Freshwater) Regulations 2020		That is not proposed here. The NES-F prohibitions do not apply.
Natural Resources Plan (operative)	Rule R121	Prohibits activities in outstanding wetlands. That is not proposed here. This prohibited rule of the NRP does not apply to this proposal.
	Rule R144	Prohibits activities in a listed river or lake with outstanding value. This prohibited rule of the NRP does not apply to this proposal.
NRP Plan Change 1. ²³	WH.R13	Stormwater from a new unplanned Greenfield Development. Resource consent will be sought under this rule as notified it is unclear whether it is applicable to quarrying activities. Variation 1 to Plan Change 1 has been notified in November 2025 but does not propose any amendments to this rule.
Operative City of Lower Hutt District Plan (PC56 Version)	N/A	The Operative District Plan has no rules with prohibited activity status that are potentially relevant to this proposal.
Proposed Lower Hutt District Plan 2025.	Rule NFL-R5	Prohibits new quarrying activities in outstanding natural features and landscapes (ONFLs). This prohibited rule of the PDP does not apply to this proposal.
	Rule CE-R5	Prohibits new quarrying activities in High or Very High Outstanding Coastal Natural Character Areas (NCAs). This prohibited rule of the PDP does not apply to this proposal.
	Rule QUARZ-R7	Prohibits residential activities that are not provided for as a discretionary activity in the quarry zone. This prohibited rule of the PDP does not apply to this proposal.

- 14.20 As demonstrated above, NRP PC1 Rule WH.R13 may apply and so resource consent approval will be sought for this as part of Substantive Application. The activity status of Rule WH.R13 while it is in a proposed plan, is discretionary per section 87B(1) of the RMA 1991.
- 14.21 Prohibited rules under the Proposed Lower Hutt District Plan, such as NFL-R5, CE-R5, and QUARZ-R7, are not relevant to this proposal because the exchange land is not in an outstanding natural feature or landscape or a high- or very-high outstanding coastal natural character area.
- 14.22 Quarrying activities are prohibited under Toitu te Whenua / the Parks Management Plan, but that only applies to the management of activities that occur within the Belmont Regional Park that are subject to the management plan under the Reserves Act 1977. This is not an instance of a “prohibited activity” under the RMA 1991.

²³ Council intends to initiate a Variation to Plan Change 1; subject to the Resource Management (Consenting and Other System Changes) Amendment Bill

Does the Applicant seek a determination under s 23 or s 24[s 13(4)(p)]

- 14.23 Winstone does not seek a determination under sections 23 or 24 of the Fast-track Approvals Act 2024. The proposal does not relate to linear infrastructure nor involve Māori land.

Description of any process already undertaken per PWA [s 13(4)(m)]

- 14.24 No processes have been initiated under the Public Works Act 1981 in relation to the proposed land exchange. Winstone Aggregates is not a requiring authority under the Public Works Act, so that legislation has no application to the Project.

Land ineligible for FTAA 2024 [sch 6 cl 29(3)]

- 14.25 The exchange land is not listed in any of the categories of land in Schedule 4 of the Act that are ineligible for exchange. Schedule 4 and Schedule 6 clause 29(3) make the following types of land ineligible for exchange:

- i. National park.
- ii. Nature reserve classification.
- iii. scientific reserve classification.
- iv. wilderness area classification.
- v. sanctuary classification.
- vi. Wildlife sanctuary.
- vii. Are with RAMSAR status.²⁴
- viii. national reserve classification.

- 14.26 The land is not classified under any of the protected reserve categories listed in Schedule 4 of the FTAA 2024. Further, the exchange does not trigger a right of first refusal under Settlement legislation.

²⁴ Ramsar Convention on Wetlands

15.0 Statutory assessment (Sch 6 Sec 29)

- 15.1 The following section assesses the matters that DOC and the panel take into account in preparing their respective report and decisions under Schedule 6, clauses 26 and 29 of the Act.

Assessment against the purpose of FTAA 2024

- 15.2 The purpose of the FTAA 2024 (at s 3) is to '*facilitate the delivery of infrastructure and development projects with significant regional or national benefits*'.
- 15.3 To assist the panel with its assessment, Winstone has obtained an economics assessment from Market Economics (Appendix B8) that focuses on the significant regional and national benefits of the exchange proposal. The economic effects of the land exchange relate directly to the continued operation of Belmont Quarry. Wellington is already operating in an aggregate deficit position which means material must be sourced from further away at higher cost. Securing the land exchange maintains access to a reliable local supply and avoids the broader economic pressures that arise when transport distances increase and aggregate becomes more expensive to move.
- 15.4 The proposed land exchange supports the objective of the Fast-track Approvals Act 2024 to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. Belmont Quarry is a regionally significant source of aggregate, supplying approximately 40% of the Wellington Region's total aggregate demand and more than half of its high-grade aggregate used for concrete and roading.
- 15.5 The proposal enables the creation of an adjacent overburden disposal area by facilitating a land exchange between Winstone (Fletcher) and DOC. This action unlocks additional capacity and extends the quarry's operational life by up to 35-40 years. By situating the disposal area immediately next to the quarry, the proposal also reduces the need for long-haul overburden transport, thereby decreasing traffic on the state highway network, lowering emissions, and mitigating environmental impacts. These efficiencies support the timely and cost-effective delivery of regional infrastructure projects such as RiverLink, housing development, and public transport upgrades.
- 15.6 The land exchange also achieves a net benefit to conservation values, including ecological and recreational values, optimising public land outcomes while enabling strategic infrastructure delivery. The proposal aligns with the Act's purpose by enabling infrastructure growth, maintaining critical supply chains, and delivering long-term benefits to the Wellington Region.

Conservation values

- 15.7 DOC and the panel are required to 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 affected. The exchange may not be approved unless it enhances the conservation values of land managed by DOC.
- 15.8 For reasons set out above in section 9, the land exchange will result in a net gain in conservation values on land managed by DOC.
- 15.9 This means that the criteria in sch 6, cl 29(2) are met: the land exchange (including money to be received and conditions that may be imposed) will enhance the conservation values of land managed by the Department of Conservation.

Financial implications, legal and financial liabilities, health and safety risks

- 15.10 The financial implications, legal and financial liabilities, and health and safety risks for the Crown of approving the land exchange are likely to be negligible as outlined in section 12. The health and safety risks can be practically managed.

Practicalities of the consequences of the land exchange

- 15.11 The consequences of the land exchange will be practical for the Crown to manage on an ongoing basis. DOC has 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. The exchange will create no enclave of private land. See further discussion above at paragraphs 12.37 to 12.39.

Conservation General Policy 2005, Wellington Conservation Management Strategy (2019), Reserve Management Plan (Toitu Te Whenua) schedule 6 cl 29(1)(a)(vi) and 29(1)(b)

Conservation General Policy 2005

- 15.12 DOC and the panel are required to include information about and take into account statements of general policy approved under the Conservation Act 1987.
- 15.13 The Conservation General Policy 2005 (CGP 2005) provides national direction for the management of public conservation land and associated planning instruments under the Conservation Act 1987. Clause 1(a) of the CGP 2005 states that it applies only to lands, waters and resources managed by the Department of Conservation. Belmont Regional Park, while owned by the Crown, is administered by Wellington Regional Council ('Greater Wellington') under the Reserves Act 1977 and is, therefore, outside the formal scope of the CGP 2005.
- 15.14 The CGP 2005 has been considered in the assessment of this land exchange as a relevant source of guidance on the interpretation of conservation values. Its principles

have informed the comparative evaluation undertaken under Schedule 6, Clause 26(1)(e), of the FTAA 2024. While not determinative, Policy 6(a) has supported the evaluation of conservation outcomes and helped guide consideration of ecological, cultural, and public-benefit values associated with the proposal.

- 15.15 Policies in the CGP do not apply to the DOC-Give area, as a form of reserve controlled and managed by Greater Wellington. Greater Wellington has been appointed to control and manage Dry Creek Recreation Reserve, by way of Gazette notice. So, there are no directly applicable policies in the CGP. The following assessment is provided for completeness in the instance that the Panel finds value in such an evaluation.
- 15.16 The CGP 2005 includes objectives that promote the protection of indigenous species and natural systems (Policy 4.1), the recognition of relationships with tangata whenua (Policy 2.2), and the maintenance of the natural character of public conservation lands (Policy 4.4). It also highlights the importance of long-term ecological sustainability and public enjoyment, both of which align with conservation outcomes (Policies 3.1 and 4.3).
- 15.17 While Policy 6 of the CGP does not apply to a reserve (such as this one) that is not administered by DOC, it is still a useful indicator of the matters that would be appropriate to consider regarding an exchange of public conservation land. Policy 11 will apply to any wildlife approval sought as part of the substantive application for this Project.
- 15.18 With regard to Policy 6(a), the CGP anticipates that public conservation land may need to be acquired, exchanged, or adjusted in order to achieve or contribute towards conservation values. Policy 6(a) provides for the exchange or acquisition of land into the PCL in three circumstances:
 - i. Where the acquisition or exchange would allow for the management of natural resources or historical and cultural heritage, for conservation purposes.
 - ii. The benefit and enjoyment of public, including public access, here the land has international, national, or regional significance.
 - iii. Where the land acquisition or exchange would achieve any one of 7 listed outcomes which appear to relate to conservation purposes.
- 15.19 In this case, the proposed DOC-Get land, would allow for the land to be managed for conservation purposes, and for the natural resources, and historical and cultural heritage of that land to be conserved. The proposed land exchange is consistent with CGP Policy 6(a) to the extent that it is applicable to the land exchange.
- 15.20 These principles have been considered as part of the comparative assessment. Historical land uses significantly constrain the proposed DOC-Give land for exchange and have reduced its ecological and recreational value. In contrast, the DOC-Get land includes regenerating native vegetation, legally protected QEII covenanted areas, and connections to existing ecological corridors. This supports broader contributions to the conservation estate and reflects the policy's intent.

Wellington Conservation Management Strategy

- 15.21 The Wellington Conservation Management Strategy (CMS-W) describes the conservation values present in Wellington. It provides guidance for DOC's work in the form of a vision, objectives, outcomes for places, policies and milestones. The CMS-W translates DOC's strategic outcomes to Wellington. The major themes identified in this CMS are engagement with tangata whenua and the community, partnering with others to deliver conservation and restoration of indigenous biodiversity.
- 15.22 Although the CMS-W has been developed through an extensive public process and incorporates input from Treaty settlement entities, it has not been co-authored or approved by them.
- 15.23 As private property, the CMS-W does not apply to the DOC-Get Land (as Fletcher land).
- 15.24 As part of Belmont Regional Park, the CMS-W does not apply to the DOC-Give land.
- 15.25 Once the land exchange takes effect, the CMS-W is expected to apply to the DOC-Get Land as part of the conservation estate managed by DOC.

Toitū Te Whenua Parks Network Plan 2020 – 2030

Overview of the Plan and its statutory context

- 15.26 The Toitū Te Whenua Parks Network Plan 2020-2030 is the operative management plan for eight regional parks across the Wellington Region, including Belmont Regional Park. Prepared by GWRC under the Reserves Act 1977 and the LGA 2002, it sets the strategic direction for how these parks are to be used, protected, and enhanced through to 2030. It replaces all earlier park-specific plans, including the 1996 Belmont Regional Park Management Plan.

Management outcomes sought for Belmont Regional Park.

- 15.27 Section 7.3 of the Plan identifies Belmont Regional Park as an important public space that offers ecological, recreational, cultural, and landscape values. The Plan describes the park as a place of regional significance due to its native ecosystems, open landscapes, recreational opportunities, and proximity to urban areas. The park includes the Belmont-Dry Creek Key Native Ecosystem and is valued for its role in supporting biodiversity, public access, and environmental education.
- 15.28 The Plan recognises the need to protect and restore the ecological integrity of the park while also enabling low-impact recreation and maintaining strong partnerships with mana whenua. It supports management actions that maintain open space, protect natural features, improve biodiversity, and enhance visitor experiences.

Relevance to the exchange area and proposal

- 15.29 The DOC-Give area proposed for exchange currently sits within Belmont Regional Park and is subject to the policies and direction set out in the Toitū Te Whenua. The land is designated as a recreation reserve and forms part of the wider park network, managed in accordance with the principles of ecological protection and public benefit.

However, the area is physically modified, adjacent to the operational quarry, and not currently used for any significant recreational purposes. Its ongoing use and future role are constrained by its proximity to active quarry operations.

- 15.30 While Toitū Te Whenua includes management directions that discourage or prohibit incompatible activities such as quarrying (Action 54, Chapter 8), it also acknowledges that partnerships and adaptive management may be required to achieve long-term outcomes.

Alignment of the exchange with park management objectives

- 15.31 The proposed exchange would introduce higher-value land into the Conservation Estate. The new land parcels to be acquired by the Crown include regenerating native bush and swamp maire planting is well-suited to long-term conservation and public access. This directly supports Toitū Te Whenua's goals of expanding ecological corridors, improving biodiversity outcomes, and enhancing landscape-scale connectivity. Although the DOC-get areas will not form part of the regional park, they will form part of the conservation estate considered as a whole.

Land disposal under Toitū Te Whenua

- 15.32 Toitū Te Whenua has four activity classes: allowed, managed, restricted, and prohibited activities. The exchange, disposal, or acquisition of land in Belmont Regional Park is a restricted activity under Policy 1.3 and Rule 49 in Table 2; importantly, it is not a prohibited activity. Therefore, the Panel is able to consider the land exchange in accordance with Toitū Te Whenua.

LAND/ASSET – EXCHANGE, DISPOSAL OR ACQUISITION	
Primary consideration is to be given when making decisions, to the land tenure and associated provisions in legislation for an area within the park. In particular, the provisions of the Local Government Act 2002, Reserves Act 1977 and the Wellington Regional Water Board Act 1972. Public notification is required. Refer Policy 51P, 52P	RESTRICTED – All parks
200	

Figure 11: Land disposal under Toitū Te Whenua.

Planning response and conclusions

- 15.33 The Toitū Te Whenua Parks Network Plan 2020-2030 sets out a clear direction for protecting and enhancing the ecological, landscape, and recreation values of Belmont Regional Park. This includes managing the park for long-term community benefit, improving biodiversity, and upholding reserve purposes.

- 15.34 The land exchange has been developed with these objectives in mind. The proposed area for removal is modified and constrained, with limited capacity to contribute to the long-term outcomes sought by the Plan. In contrast, the land to be acquired by the Crown brings additional ecological, landscape, and access value that can be enhanced over time as part of the Conservation Estate.
- 15.35 The proposal recognises the status of Belmont Regional Park as a valued public space. It aligns with the broader direction of the Parks Network Plan by supporting ecological connectivity and adding long-term conservation on public conservation land (DOC-Get). This includes areas that can better support the Plan's vision for connected green spaces, native restoration, and low-impact public access. Additional opportunities to give effect to these outcomes are expected as implementation planning progresses.

Report by Director-General of Conservation (Sch 6, Sec 26)

- 15.36 The decision-making criteria for the Director-General are set out at Section 35 FTAA 2024, and Schedule 6 Section 26 FTAA 2024. These are assessed in the following paragraphs.

Conservation values of the land, including abundance/threat status and comparative assessment (26(1)(a))

- 15.37 The Fletcher-land proposed for addition to the conservation estate has higher ecological structure, diversity, and restoration potential compared to the Crown land to be acquired. It includes mature regenerating forest, stream corridors, and habitat linkages, whereas the Crown land is modified and of lower ecological integrity.

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

- 15.38 The land acquired by the Crown is non-rateable under section 8 of the Local Government (Rating) Act 2002. Management costs are comparable to those of other regional park areas, with no significant liabilities. The exchange does not trigger any Treaty settlement obligations or rights of first refusal.

Practicality of ongoing management and avoiding the creation of an enclave (26(1)(c))

- 15.39 The acquired land is contiguous with existing public conservation land and will not create an enclave of private land. The terrain and land conditions are consistent with those of Belmont Regional Park, making ongoing management practical.

Legal and financial liabilities and health and safety risks (26(1)(d))

- 15.40 No new legal liabilities arise except for the continuation of obligations under an existing QEII Open Space Covenant. Health and safety risks are comparable to those in the regional park.
- 15.41 Pre-application consultation with the Department of Conservation Permissions Advisor Fast-track, who advised 'DOC understands that part of the land proposed to be exchanged is subject to QEII covenant 5-07-755. DOC has been provided with a

copy of the covenant and confirms that it understands the responsibilities it would have under it in the event it becomes responsible for the management of this land after an exchange.

Policy statements under Conservation Act 1987 (26(1)(e))

- 15.42 The exchange supports the general policies for national and regional conservation by enhancing public access, improving ecological outcomes, and aligning with DOC's stewardship responsibilities.

Relevant CMS, CMP, or reserve management plan co-authored or approved by Treaty entities (26(1)(f))

- 15.43 The Wellington Conservation Management Strategy became operative on 20 January 2019. The Strategy provides a strong focus on relationships and partnerships with Treaty partners. There is no specific role to identify that Treaty entities authored or formally approved the Strategy.

Conditions that should be imposed (26(1)(g))

- 15.44 The proposal includes proffered conditions at section 13 that address ecological restoration, public access enhancement, and legal protections to ensure a net conservation benefit.

Criteria for Panel (Sec 81. Sch 6, Sec 29)

- 15.45 The decision-making criteria for the Panel are set out at FTAA 2024 Schedule 6 section 29, giving the greatest weight to paragraph (1)(a)(i):

Purpose of the Act (Schedule 6 clause 29(1)(a)(i))

- 15.46 The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. The proposed land exchange supports this purpose by enabling a long-term and reliable aggregate supply for major construction and transport projects in the Wellington Region.
- 15.47 Ecological surveys show that the land proposed for addition to the conservation estate covers a larger footprint, includes areas in a more advanced state of native regeneration and holds higher overall ecological value. The exchange provides opportunities to strengthen cultural outcomes by enabling mana whenua involvement in restoration and catchment care. Initiatives such as the proposed weed management at Dry Creek create practical ways to uphold mouri, reflect Ki Uta Ki Tai and make cultural values more visible across the Belmont landscape.
- 15.48 The exchange delivers benefit by adding land with stronger landscape values and clearer potential for rehabilitation, while opening areas that currently have no public access. It consolidates quarry activity within an already modified part of the hills and improves landscape and recreation opportunities across the conservation estate.

Conservation values and comparative assessment (Schedule 6 clause 29(1)(a)(ii))

- 15.49 The land offered for addition to the conservation estate contains more structurally diverse forest, stronger ecological connectivity and higher quality stream corridors.

The Crown land proposed for acquisition has been modified by historic farming activity and holds lower ecological value. The comparative assessment shows a clear ecological advantage in the land being contributed to the estate.

Financial implications for the Crown (Schedule 6 clause 29(1)(a)(iii))

- 15.50 The exchange poses no significant financial liability. The acquired land is non-rateable and imposes minimal additional maintenance burden. There are no fiscal impacts linked to rights of first refusal or treaty settlements.

Practicality of management and enclave considerations

- 15.51 The exchanged land integrates logically with existing Belmont Regional Park boundaries and infrastructure. No enclave of private land will be created, and the terrain, vegetation, and access are consistent with other parts of the park.

Legal, financial, and health and safety liabilities (Schedule 6 clause 29(1)(a)(v))

- 15.52 The only ongoing legal obligation is the QEII Open Space Covenant, which aligns with DOC's conservation responsibilities.
- 15.53 Health and safety effects are considered at section 10.22.

General policy statements under section 17B or section 17C (Schedule 6 clause 29(1)(a)(vi))

- 15.54 The exchange is consistent with the general policy framework for public conservation land. Policy 6 supports land acquisitions and exchanges where they improve the representativeness of public conservation land, strengthen natural functioning, enhance amenity and public access, or improve natural linkages between places. The land being added to the conservation estate achieves several of these outcomes by increasing ecological integrity, expanding areas of native vegetation, and creating opportunities for improved access and long-term conservation management.
- 15.55 Assessment of CGP Policy 6(a) is presented at paragraph 13.22 above.

Conservation strategies or plans co-authored or approved by Treaty entities (Schedule 6 clause 29(1)(a)(vii)).

- 15.56 No such plans apply to this specific area, but engagement with Taranaki Whānui and Ngāti Toa Rangatira is ongoing. The proposal has the potential to support iwi values, particularly around ecological restoration and access to culturally significant areas.

Other Conservation Management Strategies or reserve management plans (Schedule 6 clause 29(1)(b)).

- 15.57 The proposed exchange aligns with the Toitū Te Whenua Parks Network Plan 2020-2030. The Plan supports the enhancement of recreational and ecological outcomes. The Wellington CMS is not relevant to the DOC-Give land, which GWRC administers (by way of delegated authority from DOC).

Enhancement of conservation values (Schedule 6 clause 29(2)).

- 15.58 The proposal results in a net gain in conservation value by contributing a larger, ecologically richer land area to the conservation estate. Restoration conditions further improve this outcome.

Restrictions on Crown land status (Schedule 6 clause 29(3)).

- 15.59 The land to be exchanged is not listed in Schedule 4, is not a national reserve, and does not trigger any unresolved rights of first refusal.

Conservation Act declarations (Schedule 6 clauses 29(4) and 29(5))

- 15.60 The land is not subject to any declaration or classification under section 18 of the Conservation Act 1987. No revocation is required under section 18(7).

Do any situations apply where panel must decline [sch 6 cl 29(3)]

- 15.61 The grounds on which an approval may be declined are set out in section 85 of the Act.
- 15.62 For a land exchange approval, it must be declined if schedule 6 clause 29(2) or (3) applies. As set out above, this land exchange (including improvements and monies offered) will enhance the conservation values of land managed by DOC. Therefore clause 29(2) does not require the panel to decline approval. In addition, none of the matters in clause 29(3) apply to the exchange proposal because the land to be exchanged is not listed in Schedule 4 of the Act or a national reserve under s 13 of the Reserves Act. Paragraph 15.51 above has considered whether any rights of first refusal or similar are triggered by the proposed exchange and concluded that there are no such rights.
- 15.63 The panel may in its discretion decline approval under section 85(3) if it considers that there are adverse impacts of the approval that are out of proportion to the project's regional or national benefits. This ground for a discretionary decline is not applicable because:
- 15.64 There are no significant adverse impacts of granting the land exchange approval rather, it will provide a net benefit to the conservation estate; and
- 15.65 The project will have significant regional benefits that outweigh any adverse impacts.

16.0 Conclusion

- 16.1 This report supports an application by Winstone Aggregates under section 33 of the Act for a land exchange associated with the Belmont Quarry Development Project. The exchange seeks to enable a new OBDA essential to extending the quarry's operational life by approximately 35–40 years. The project delivers benefits of regional significance being the supply of aggregate to Wellington's infrastructure and development projects.

- 16.2 The proposal involves transferring approximately 34 ha of Fletcher-owned land (Northern Gully, Southern Gully, Firth Block, and Dry Creek) to the conservation estate and receiving approximately 23.86 ha of Crown-owned recreation reserve land within Belmont Regional Park. The exchange land is managed by Greater Wellington Regional Council (GWRC) on behalf of the Department of Conservation (DOC). The exchanged areas are assessed for ecological, landscape, cultural, and recreational values in accordance with Schedule 6 of the FTAA.

- 16.3 A comparative assessment of conservation values (ecology, landscape, recreation, hydrology, archaeology, and cultural values) was undertaken and concludes that the land exchange will result in a net conservation benefit, particularly in indigenous forest and aquatic habitat. The proposed DOC-Get areas possess mature tawa kāmāhi forest, wetlands, and continuous native vegetation, whereas the DOC-Give land contains younger, regenerating forest of lesser value. Landscape and hydrological analyses similarly show a net benefit to the conservation estate.

- 16.4 Consultation was undertaken with DOC, GWRC, Hutt City Council, Taranaki Whānui ki Te Upoko o Te Ika, Ngāti Toa Rangatira, Te Āti Awa, Muaūpoko, Rangitāne, QEII Trust, Transpower, and local residents and groups. No ineligible activities were identified, and relevant statutory obligations (including but not limited to Treaty settlements, RFR provisions, and conservation policy consistency) have been satisfied.

- 16.5 Overall, this report concludes that the proposed exchange meets the statutory tests of the FTAA Schedule 6, delivers a net conservation benefit, and is a prerequisite step toward the later substantive fast-track application for resource consents to enable the new OBDA.