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### **3.3.49 Analysis**

349. In my opinion, a definition for 'highly erodible land' is necessary to support interpretation of the concept of "right tree-right place", identifying areas where plantation forestry is inappropriate due to the high risk of impacts associated with of clearfell harvesting, including on, land stability, soil erosion and associated sedimentation of waterways. The impacts of severe rainfall on highly erodible land, particularly associated with cycles of harvesting and planting plantation forest, as evidenced by the significant erosion and soil loss following from intense rainfall events in the East Coast, emphasises the importance of ensuring that highly erodible land is covered in resilient, long-lived vegetation, rather than plantation forest.

350. I agree with the concerns raised by WFF about the coarse resolution of erosion susceptibility "red zone" classification used in the NES-PF and note that Council science staff advise that red-zoned land comprises only a small sub-set of highly erodible land in the Region. For this reason, along with the fact that this classification system was developed to inform plantation forestry practice as part of implementing the NES-PF, rather than identify priority areas for restoring forest cover, I agree with GWRC's submission that requests removal of reference to this classification in the definition for highly erodible land. I consider that the definition for highly erodible land used by MfE and Statistics NZ<sup>19</sup> is appropriate to be used in Change 1 as it was developed to inform national erosion management policy and state of the environment monitoring and has been used to develop a detailed spatial digital layer of highly erodible land. I do note that the Change 1 definition does not include the term mass-movement, which is part of the MfE/Statistics NZ definition and I recommend that it be added.

351. I have discussed use of the term "deep-rooted woody vegetation" with Council staff with expertise in land management and they advise that this term is commonly used and well-understood by the land management sector, including landowners. As it is part of a nationally accepted definition, I recommend that it be retained and that a definition for this is not needed.

### **3.3.50 Section 32AA evaluation**

352. In accordance with section 32AA, I consider that my recommended amendment to the definition for Highly erodible land is the most appropriate as it removes confusion of referring to two different methodologies and will therefore provide clarity and consistency for those interpreting and implementing it and remove any costs arising from a lack of clarity.

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<sup>19</sup> [Highly erodible land | Stats NZ](#)























