

Appendix 2: Description of matters raised by Submitters (by issue)

N.B Because of the way submissions have been summarised and categorised to various provisions some of the submission points in this table appear in more than one issue or sub-issue. This is particularly the case for Issue 17 (Forestry provisions general opposition). There are too many of these submission points for a table outlining where all of the submission points are duplicated in issues (as per Hearing Stream 2) to be helpful.

Issue 1: Freshwater Planning Instrument

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Review allocation of provisions to FPP vs P1S1	Winstone Aggregates raises concern with provisions being subject to the FPP where freshwater is only a peripheral issue to which the provision relates, and considers this is inappropriate use of the FPP, resulting in jurisdictional problems such as restricted appeal rights. Considers improper allocation results in delays and costs and is exacerbated by the proposed activity statuses being too restrictive. Accordingly, Winstone Aggregates seeks for a review of the scope of FPP versus P1S1 processes, and for only provisions where freshwater is the primary issue to be subject to the FPP, with the remaining provisions to be allocated to P1S1.	Winstone Aggregates [S206.022] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.018])
	Horokiwi Quarries ¹ and Winstone Aggregates ² oppose Rules WH.R17-WH.R19 and P.R16-P.R18 and Schedule 33 being subject to the Freshwater Planning Process, as they relate to erosion and soil conservation rather than specifically freshwater. These submitters consider this to be inconsistent with the approach taken to the overarching objective and policy of the RPS Change 1 which considered those under the Schedule 1 process. Should the definition of highest erosion risk land (woody vegetation) and highest erosion risk land (plantation forestry) be retained, Winstone Aggregates seek they be subject to the Part 1 Schedule 1 Process and not the Freshwater Planning Process.	See footnotes
	Guildford Timber, Silverstream Forest and Goodwin Estate is concerned that a number of provisions of PC1 that relate to plantation (commercial) forestry and vegetation clearance are incorrectly allocated as Freshwater Planning Process (FPP) provisions. The submitter considers it is unclear how plantation (commercial) forestry activities in line with the NES-CF (2023) are allocated to the FPP and notes the definition of Afforestation, Harvesting, Mechanical land preparation, Replanting, Vegetation Clearance for the purpose of the plantation (commercial) forestry rules, that all come from the NES-CF (updated November 2023) but have been allocated to the FPP. The submitters view is the primary aim of these regulations is forestry not freshwater. Specifically, Policy WH.P28; Rules WH.R20; WH.R21 and WH.R22 controlling plantation (commercial) forestry are all allocated to the FPP process and Rules WH.R17; WH.R18 and WH.R19 relating to vegetation clearance are all allocated to the FPP process. Guildford Timber, Silverstream Forest and Goodwin Estate is also opposed to rules WH.R20 and WH.R21 being allocated to the FPP process	Guildford Timber, Silverstream Forest and Goodwin Estate [S210.004]; [S210.048] (supported by NZCF [FS50.072]) and [S210.049] (supported by NZCF [FS50.073])
	NZCF notes majority of PC1 provisions subject to this submission form part of a freshwater planning instrument. Given the s32 report suggests the primary intent of the provisions is to manage a land use activity, NZCF considers PC1 draws a longbow in determining scope of the freshwater planning instrument and is concerned using a freshwater planning instrument to address land use activities inappropriately affects (inferred) the procedural rights of the submitter. NZCF also notes PC1 including the Section 32 Report, does not explicitly identify the Objective that gives rise to the provisions being a freshwater planning instrument.	NZCF [S263.002] (opposed by Forest & Bird [FS23.373])
	Transpower ³ opposes rule P.R16, P.R17, P.R18 Schedule 33 and rules WH.R17 - WH.R19 being included within freshwater planning instrument, as the purpose of these provisions is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	See footnotes
	Ara Poutama notes inappropriate use of the freshwater planning process for vegetation clearance and earthworks provisions and considers the principal purpose of these provisions is to control the use of land for the purpose of soil conservation. Ara Poutama also considers none of these rules manage discharges to freshwater. Ara Poutama also opposes Schedule 33 and 34 being included within freshwater planning instrument, as purpose of the schedules is to manage land use for the purposes of soil conservation and seeks these schedules be reallocated to the Part 1 Schedule 1 planning instrument.	Ara Poutama [S248.006]; [S248.075] and [S248.078]

¹ Horokiwi Quarries [S2.034] (supported in part by Meridian [FS47.227]); [S2.035]; [S2.036] and [S2.042]
² Winstone Aggregates [S206.056] (supported in part by Meridian [FS47.230]); [S206.057] (supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.022], opposed by Meridian [FS47.239]); [S206.058] (supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.023]); [S206.084] (supported in part by Meridian [FS47.368]); [S206.085] (opposed by Meridian [FS47.377]); [S206.086]; [S206.092]; [S206.027] (supported by Meridian [FS47.123]) and [S206.025] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.019])
³ Transpower [S177.038] (supported in part by Meridian [FS47.228], opposed by Forest & Bird [FS23.781]); [S177.039] (opposed in part by Meridian [FS47.237], opposed by Forest & Bird [FS23.782]); [S177.040] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.026], opposed by Forest & Bird [FS23.783]); [S177.064] (supported in part by Meridian [FS47.366], opposed by Forest & Bird [FS23.807]); [S177.065] (opposed in part by Meridian [FS47.375], opposed by Forest & Bird [FS23.808]); [S177.066] (opposed by Forest & Bird [FS23.809]); [S177.076] (opposed by Forest & Bird [FS23.819])

Issue 2: General comments vegetation clearance rules

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General/overarching	Transpower is concerned the vegetation clearance provisions on 'high erosion risk land' do not recognise the need to undertake vegetation clearance to prevent encroachment of woody vegetation on National Grid transmission lines and support structures. Transpower considers revegetation should not be promoted underneath or near to National Grid transmission lines and support structures, as this may compromise future safe operation of the National Grid. Transpower seeks specific reference to NESETA at start of the chapter to highlight NESETA regulations to plan users. Transpower also questions the appropriateness of the mapping used to identify where resource consent is required for vegetation clearance, noting mapping includes small and incohesive areas of vegetation, and questions the efficiency or effectiveness of regulating these, and considers the maps should be amended to only identify cohesive areas of vegetation being subject to rules.	Transpower [S177.006] (opposed by Forest & Bird [FS23.749])
Duplication of rules	Woodridge considers: P.R16 repeats WH.R17 and should be deleted. Woodridge seeks P.R16 and WH.R17 be combined into one rule. Woodridge considers Rule P.R17 repeats Rule WH.R18 and is unnecessary and seeks they be combined into one rule. Woodridge consider Rule P.R17 repeats Rule WH.R18 and that the rule is deleted and Rules P.R17 and WH.R18 are combined into one rule.	Woodridge [S255.066]; Woodridge [S255.067] and [S255.068]

Issue 3: Rules WH.R17 and P.R16

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	<p>Kāinga Ora, Guildford Timber Company, Silverstream Forest and Goodwin Estate and Taranaki Whānui generally support Rule WH.R17.</p> <p>Kāinga Ora, KiwiRail and PCC generally support Rule P.R16.</p>	<p>Kāinga Ora [S257.034] (supported by Meridian [FS47.232]) and [S257.062] (supported by Meridian [FS47.371])</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.045]</p> <p>Taranaki Whānui [S286.081] (supported by Rangitāne [FS24.081], opposed by Meridian [FS47.236])</p> <p>KiwiRail [S279.020] (supported by MPHRCI [FS27.1084], opposed by Meridian [FS47.374])</p> <p>PCC [S240.074] (supported by WCC [FS36.017], opposed by NZFFA [FS9.171])</p>
General opposition	<p>WFF seeks amendments to be consistent with relief sought for freshwater farm plans and deletion of Rules WH.R17 and P.R16.</p> <p>Horokiwi Quarries oppose Rule WH.R17 and considers it does not allow vegetation clearance for most land uses. Horokiwi Quarries considers the existing approach of managing erosion-prone land under Rule R104 -R107 of the NRP is more fit for purpose.</p> <p>Winstone Aggregates opposes Rules WH.R17 and P.R16 for the same reasons stated as Horokiwi Quarries.</p> <p>Ian Stewart opposes Rule WH.R17 on the basis vegetation clearance is more appropriately addressed by District Plans and seeks its deletion.</p>	<p>WFF [S193.094] (supported in part by Meridian [FS47.229], opposed by Forest & Bird [FS23.1050]) and [S193.143] (supported in part by Meridian [FS47.367], opposed by Forest & Bird [FS23.1099])</p> <p>Horokiwi Quarries [S2.034] (supported in part by Meridian [FS47.227])</p> <p>Winstone Aggregates [S206.056] (supported in part by Meridian [FS47.230]) and [S206.084] (supported in part by Meridian [FS47.368])</p> <p>Ian Stewart [S32.009]</p>
Alignment with NES-CF	<p>Forest Enterprises considers Rules WH.R17 and P.R16 do not acknowledge the NES-PF/CF.</p> <p>PF Olsen seeks alignment of Rules WH.R17 and P.R16 with the NES-CF standards for vegetation clearance, a more scientific approach and consideration of positive effects of well managed forests.</p> <p>CFG notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ Forest Accord. CFG considers Rules WH.R17 and P.R16 create unnecessary overlap, cost and confusion. CFG seeks the removal of Rules WH.R17 and P.R16, and to align requirements with the NES-CF.</p>	<p>Forest Enterprises [S111.010] and [S111.016] (supported by Pukerua Holdings [FS30.060])</p> <p>PF Olsen [S18.032] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.059]) and [S18.058]</p> <p>CFG [S288.066] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.111], opposed by Forest & Bird [FS23.090]) and [S288.110] (opposed by Forest & Bird [FS23.134])</p>
Neutral stance	<p>Mangaroa Farms notes any further restrictive changes to these provisions (including Rule WH.R17) could negatively impact the day-to-day operations of Mangaroa Farms, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered. The submitter seeks retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms and any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.</p>	<p>Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.014]</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Area threshold	<p>Horokiwi Quarries and Cannon Point seek amendments to Rule WH.R17 to make it clear what vegetation clearance threshold is a permitted activity amid concern vegetation clearance less than 200m² will be considered discretionary. Best Farm & Others seeks the same relief for Rule P.R16.</p> <p>Kāinga Ora, Transpower, Winstone Aggregates, Ara Poutama and Forest & Bird seek the same amendments for both Rules WH.R17 and P.R16. Amendments to permitted activity rules for vegetation clearance on highest erosion risk land (woody vegetation) to ensure vegetation clearance less than 200m² is clearly provided for under a rule (and is not an innominate discretionary activity).</p> <p>Cannon Point considers the 200m² threshold for Rule WH.R17 is too small for large properties where maintenance is required to clear woody vegetation and requests clearance of 2,000m² per property as a minimum. Best Farm & Others and Winstone Aggregates also consider the threshold for Rule P.R16 is too low.</p>	<p>Horokiwi Quarries [S2.034] (supported in part by Meridian [FS47.227])</p> <p>Cannon Point [S260.013] (supported in part by Meridian [FS47.233], opposed by Forest & Bird [FS23.016])</p> <p>Best Farm & Others [S254.017] (supported by Meridian [FS47.370])</p> <p>Kāinga Ora [S257.034] (supported by Meridian [FS47.232]) and [S257.062] (supported by Meridian [FS47.371])</p> <p>Transpower [S177.038] (supported in part by Meridian [FS47.228], opposed by Forest & Bird [FS23.781]) and [S177.064] (supported in part by Meridian [FS47.366], opposed by Forest & Bird [FS23.807])</p> <p>Winstone Aggregates [S206.056] (supported in part by Meridian [FS47.230]) and [S206.084] (supported in part by Meridian [FS47.368])</p> <p>Ara Poutama [S248.011]</p> <p>Forest & Bird [S261.110] (supported by MPHRCI [FS27.729], opposed in part by Meridian [FS47.234], Transpower [FS20.030], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.040], Hort NZ [FS1.049], NZFFA [FS9.437], and Winstone Aggregates [FS8.023]); and Forest & Bird [S261.187] (supported by MPHRCI [FS27.806], opposed in part by Meridian [FS47.372], Transpower [FS20.047], opposed by Hort NZ [FS1.072], NZFFA [FS9.514])</p>
Provide for clearance associated with certain activities	<p>Transpower seeks an exclusion in Rules WH.R17 and P.R16 to allow vegetation clearance for the purposes of operating or maintaining the National Grid.</p> <p>Cannon Point seeks provision in Rule WH.R17 for clearing of vegetation for track maintenance as a permitted activity.</p> <p>NZTA seeks an exclusion for Rules WH.R17 and P.R16 to provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network and any further alternative or consequential relief as may be necessary to fully achieve the relief sought.</p> <p>PCC would like to see amendments to Rule P.R16 to provide for the creation or maintenance of fire breaks as a permitted activity.</p>	<p>Transpower [S177.038] (supported in part by Meridian [FS47.228], opposed by Forest & Bird [FS23.781]) and [S177.064] (supported in part by Meridian [FS47.366], opposed by Forest & Bird [FS23.807])</p> <p>Cannon Point [S260.013] (supported in part by Meridian [FS47.233], opposed by Forest & Bird [FS23.016])</p> <p>NZTA [S275.027] (supported by Meridian [FS47.235], opposed by Forest & Bird [FS23.721]) and [S275.029] (supported by Meridian [FS47.373], opposed by Forest & Bird [FS23.723])</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		PCC [S240.074] (supported by WCC [FS36.017], opposed by NZFFA [FS9.171])
Slash and debris	Yvonne Weeber considers Rules WH.R17 and P.R16 require amendment to address slash and debris causing flooding in storm events.	Yvonne Weeber [S183.240] (supported by MPHRCI [FS27.240]) and [S183.322] (supported by MPHRCI [FS27.322])
Amendments to protect waterbodies	<p>Forest & Bird seek amendments to Rules WH.R17 and P.R16 to avoid sediment entering receiving water bodies. Specific amendments sought by Forest & Bird include:</p> <ul style="list-style-type: none"> Delete clause (a)(ii) or create a definition of pest plants as those plants listed in the GWRC pest management plan. Introduce a requirement for pest plant removal to not exceed a given area per year – i.e. specify the 200m² threshold, at which point WH.R18 applies. Include the following additional standards <p>...</p> <p><i><u>(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area</u></i></p> <p><i><u>(x) vegetation clearance does not exceed 200m² per property in any consecutive 12-month period</u></i></p> <p>Hort NZ, in further submissions, opposes the introduction of additional standards on the basis setbacks are managed through district plans and pest plants may need to be removed for biosecurity purposes. Hort NZ requests specific amendments as follows:</p> <p>...</p> <p><i><u>(a)</u></i></p> <p><i><u>(ii) for the control of pest plants, and or</u></i></p> <p><i><u>(iii) to remove material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993, and</u></i></p> <p>Transpower, Winstones Aggregates, Guildford Timber Company, Silverstream Forest and Goodwin Estate in further submissions oppose additional setbacks and reference to ephemeral watercourses. Meridian considers the area limit should be increased for RSI to match rule R104 of the NRP.</p>	<p>Forest & Bird [S261.110] (supported by MPHRCI [FS27.729], opposed in part by Meridian [FS47.234], Transpower [FS20.030], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.040], Hort NZ [FS1.049], NZFFA [FS9.437], Winstone Aggregates [FS8.023])</p> <p>Forest & Bird [S261.187] (supported by MPHRCI [FS27.806], opposed in part by Meridian [FS47.372], Transpower [FS20.047], opposed by Hort NZ [FS1.072], NZFFA [FS9.514])</p>
Higher activity status	EDS suggest making Rules WH.R17 and P.R16 controlled activities or alternatively amending permitted activity standards to avoid sedimentation of receiving waterbodies and the coastal marine area.	<p>EDS [S222.057] (supported by Forest & Bird [FS23.213], MPHRCI [FS27.949], opposed by Meridian [FS47.231], NZFFA [FS9.238], Transpower [FS20.007], Winstone Aggregates [FS8.016])</p> <p>EDS [S222.099] (supported by Forest & Bird [FS23.255], MPHRCI [FS27.991], opposed by Meridian [FS47.369], NZFFA [FS9.280], Transpower [FS20.014])</p>
Definition of pest plants	Hannah Bridget Gray (No2) Trust, Best Farm & Others, Pauatahanui Residents Association, Christine Stanley and Jo McReady seek a definition for pest plants for Rule P.R16.	<p>Hannah Bridget Gray (No2) Trust [S105.017]</p> <p>Best Farm & Others [S254.017] (supported by Meridian [FS47.370])</p> <p>Pauatahanui Residents Association [S16.011]</p> <p>Christine Stanley [S26.017]</p> <p>Jo McCready [S94.010]</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Mapping and classification of highest risk erosion land	<p>Horokiwi Quarries seeks review of the mapping and definition of erosion prone land regarding Rule WH.R17. Winstone Aggregates and Transpower seek the same relief as Horokiwi Quarries for both Rules WH.R17 and P.R16 and Best Farm & Others seeks deletion of the maps.</p> <p>Guildford Timber Company, Silverstream Forest and Goodwin Estate supports Rule WH.R17 subject to better mapping.</p> <p>Louise Askin seeks implementation of WIP recommendation 36 for Rule WH.R17 and seeks farm-scale assessments of highest risk land be used rather than current whitua-wide mapping.</p>	<p>Horokiwi Quarries [S2.034] (supported in part by Meridian [FS47.227])</p> <p>Winstone Aggregates [S206.056] (supported in part by Meridian [FS47.230]) and [S206.084] (supported in part by Meridian [FS47.368])</p> <p>Transpower [S177.038] (supported in part by Meridian [FS47.228], opposed by Forest & Bird [FS23.781]) and [S177.064] (supported in part by Meridian [FS47.366], opposed by Forest & Bird [FS23.807])</p> <p>Best Farm & Others [S254.017] (supported by Meridian [FS47.370])</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.045]</p> <p>Louise Askin [S9.023]</p>

Issue 4: Rules WH.R18 and P.R17

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	<p>KiwiRail, Taranaki Whānui and Civil Contractors NZ support the intent of Rule WH.R18. Civil Contractors NZ seeks no specific relief but suggests engagement with contractors responsible for vegetation clearance should be undertaken by GWRC to clarify their responsibilities under the new plan and GWRC should work with industry bodies to compose and circulate good information on how to prepare sediment control plans.</p> <p>PCC and KiwiRail generally support the intent of Rule P.R17 and seek it is retained as notified.</p>	<p>KiwiRail [S279.008] (supported by MPHRCI [FS27.1072], opposed by Meridian [FS47.244] and [FS47.384]) and [S279.021] (supported by MPHRCI [FS27.1085])</p> <p>Taranaki Whānui [S286.082] (supported by Rangitāne [FS24.082], opposed by Meridian [FS47.245])</p> <p>Civil Contractors NZ [S285.022] (supported by Goodman Contractors [FS35.022], supported by Multi Civil Contractors [FS49.022])</p> <p>PCC [S240.075] (opposed by Meridian [FS47.379], opposed by NZFFA [FS9.172])</p>
General opposition	<p>WFF seeks retention of the operative NRP rules, with respect to Rules WH.R18 and P.R17.</p> <p>Ian Stewart opposes Rule WH.R18 on the basis vegetation clearance is more appropriately addressed by District Plans and seeks it is deleted.</p> <p>Jo McReady considers the conditions for Rule P.R17 are arbitrary with no factual basis and seeks they are amended to allow for an individual property scale response.</p>	<p>WFF [S193.095] (supported in part by Meridian [FS47.238], opposed by Forest & Bird [FS23.1051]) and [S193.144] (supported in part by Meridian [FS47.376], opposed by Forest & Bird [FS23.1100])</p> <p>Ian Stewart [S32.010]</p> <p>Jo McCready [S94.011]</p>
Alignment with NES-CF	<p>Forest Enterprises consider Rules WH.R18 and P.R17 do not acknowledge the NES-PF/CF.</p> <p>PF Olsen seeks alignment of Rules WH.R18 and P.R17 with the NES-CF standards for vegetation clearance, a more scientific approach and consideration of positive effects of well managed forests.</p> <p>CFG notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ Forest Accord. CFG considers Rules WH.R18 and P.R17 create unnecessary overlap, cost and confusion. CFG seeks removal of Rules WH.R18 and P.R17 and to align requirements with the NES-CF.</p>	<p>Forest Enterprises [S111.011] and [S111.017] (supported by Pukerua Holdings [FS30.061]) and [S111.017] (supported by Pukerua Holdings [FS30.061])</p> <p>PF Olsen [S18.033] and [S18.059]</p> <p>CFG [S288.067] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.112], opposed by Forest & Bird [FS23.091]) and [S288.111] (opposed by Forest & Bird [FS23.135])</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Neutral stance	<p>Transpower is neutral on Rules WH.R18 and P.R17, subject to their relief on Rules WH.R17 and P.R16 being granted, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Transpower considers the rehabilitation of areas of cleared vegetation (matter of control 3) should not be undertaken in a manner or in locations where vegetation would encroach on National Grid lines or structures and proposes an additional matter of control to address this:</p> <p><i>7. The need for any rehabilitated areas of vegetation to be clear of National Grid transmission lines and support structures</i></p> <p>Mangaroa Farms notes any further restrictive changes to these provisions (including Rule WH.R18) could negatively impact the day-to-day operations of Mangaroa Farms, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered. The submitter seeks retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms and any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.</p> <p>Horokiwi Quarries, in a neutral stance on Rule WH.R18, seeks retention of controlled activity status for vegetation clearance which exceeds 200m², and seeks clarity on how the 200m² is calculated. Similarly, Winstone Aggregates is neutral on Rules WH.R18 and P.R17, noting they provide reasonable certainty to landowners that consent will be granted and seek controlled activity for vegetation clearance greater than 200m² is retained.</p>	<p>Transpower [S177.039] (opposed in part by Meridian [FS47.237], opposed by Forest & Bird [FS23.782]) and [S177.065] (opposed in part by Meridian [FS47.375], opposed by Forest & Bird [FS23.808])</p> <p>Mangaroa Farms [S194.015]</p> <p>Horokiwi Quarries [S2.035]</p> <p>Winstone Aggregates [S206.057] (supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.022], opposed by Meridian [FS47.239]) and [S206.085] (opposed by Meridian [FS47.377])</p>
Slash and debris	Yvonne Weeber seeks amendments to Rules WH.R18 and P.R17 to address slash and debris causing flooding in storm events.	Yvonne Weeber [S183.241] (supported by MPHRCI [FS27.241]) and [S183.323] (supported by MPHRCI [FS27.323])
Area threshold	<p>Kāinga Ora generally support the intent of Rules WH.R18 and P.R17 but considers the 200m² too onerous noting the operative NRP allows up to 2ha.</p> <p>Cannon Point seek an increase to the 200m² threshold for Rule WH.R18.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate considers the 200m² area for Rule WH.R18 is too restrictive and impracticable and does not recognise planation forestry operations.</p> <p>Best Farm & Others seek that the vegetation clearance threshold for Rule P.R17 is increased to 3,000m².</p>	<p>Kāinga Ora [S257.035] (supported by Transpower [FS20.059], opposed in part by Meridian [FS47.241]) and [S257.063] (supported by Transpower [FS20.067], opposed in part by Meridian [FS47.381])</p> <p>Cannon Point [S260.014] (opposed by Forest & Bird [FS23.017])</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.046]</p> <p>Best Farm & Others [S254.018] (supported in part by Meridian [FS47.380])</p>
Higher activity status	EDS and Forest & Bird consider inability to refuse consent under Rules WH.R18 and P.R17 may mean policy direction in NPSFM or NZCPS will not be achieved and that a higher activity status is required.	<p>EDS [S222.058] (supported by Forest & Bird [FS23.214], MPHRCI [FS27.950], opposed by Meridian [FS47.240], NZFFA [FS9.239], Transpower [FS20.008], Winstone Aggregates [FS8.017]) and [S222.100] (supported by Forest & Bird [FS23.256], MPHRCI [FS27.992], opposed by Meridian [FS47.378], NZFFA [FS9.281], Transpower [FS20.015])</p> <p>Forest & Bird [S261.111] (supported by MPHRCI [FS27.730], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.041], Meridian [FS47.242], NZFFA [FS9.438], NZTA [FS28.079], Transpower [FS20.031]) and [S261.188] (supported by MPHRCI [FS27.807], opposed by Meridian</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		[FS47.382], NZFFA [FS9.515], NZTA [FS28.080], Transpower [FS20.048])
Provision for certain activities	<p>Guildford Timber Company, Silverstream Forest and Goodwin Estate seek an exemption from Rule WH.R18 for vegetation clearance associated with plantation (commercial) forestry operations.</p> <p>Cannon Point seek provision in Rule WH.R18 for track maintenance as a permitted activity.</p> <p>NZTA seeks an exclusion in Rules WH.R18 and P.R17 to provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network and any further alternative or consequential relief as may be necessary to fully achieve the relief sought.</p>	<p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.046]</p> <p>Cannon Point [S260.014] (opposed by Forest & Bird [FS23.017])</p> <p>NZTA [S275.028] (supported in part by Meridian [FS47.243], opposed by Forest & Bird [FS23.722]) and [S275.030] (supported in part by Meridian [FS47.383], opposed by Forest & Bird [FS23.724])</p>
Mapping and classification of highest erosion land	<p>Horokiwi Quarries seeks review of the mapping and definition of erosion prone land with regard to Rule WH.R18. Winstone Aggregates seeks the same relief for both Rules WH.R18 and P.R17.</p> <p>Louise Askin seeks implementation of WIP recommendation 36 for Rule WH.R18 and considers farm-scale assessments of highest risk land be used rather than current whaitua-wide mapping.</p> <p>Best Farm & Others cite concerns with the mapping with regard to Rule P.R17 and seek deletion of the map.</p>	<p>Winstone Aggregates [S206.057] (supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.022], opposed by Meridian [FS47.239]) and Winstone Aggregates [S206.085] (opposed by Meridian [FS47.377])</p> <p>Horokiwi Quarries [S2.035]</p> <p>Louise Askin [S9.024]</p> <p>Best Farm & Others [S254.018] (supported in part by Meridian [FS47.380])</p>

Issue 5: Rules WH.R19 and P.R18

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	<p>Guildford Timber, Silverstream Forest and Goodwin Estate, Forest & Bird, KiwiRail and Taranaki Whānui generally support Rule WH.R19 as notified.</p> <p>Civil Contractors NZ supports good sediment control regarding Rule WH.R19 and suggests engagement with contractors responsible for vegetation clearance should be undertaken by GWRC to clarify their responsibilities under the new plan and GWRC work with industry bodies to compose and circulate good information on how to prepare sediment control plans.</p> <p>PCC, KiwiRail and Forest & Bird support Rule P.R18 as notified.</p>	<p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.047] (opposed by Meridian [FS47.247]) Guildford Timber, Silverstream Forest and Goodwin Estate [S210.003] (supported by NZCF [FS50.069])</p> <p>Forest & Bird [S261.112] (supported by MPHRCI [FS27.731], opposed by Meridian [FS47.248], opposed by NZFFA [FS9.439]) and [S261.189] (supported by MPHRCI [FS27.808], opposed by Meridian [FS47.387], NZFFA [FS9.516])</p> <p>KiwiRail [S279.009] (supported by MPHRCI [FS27.1073], opposed by Meridian [FS47.249]) and [S279.022] (supported by MPHRCI [FS27.1086], opposed by Meridian [FS47.388])</p> <p>Taranaki Whānui [S286.083] (supported by Rangitāne [FS24.083], opposed by Meridian [FS47.250])</p> <p>Civil Contractors NZ [S285.023] (supported by Goodman Contractors [FS35.023], supported by Multi Civil Contractors [FS49.023])</p> <p>PCC [S240.076] (opposed by Meridian [FS47.386], NZFFA [FS9.173])</p>
Conditional support	Cannon Point supports Rule WH.R19 if WH.R17 and WH.R18 are amended as sought.	Cannon Point [S260.015] (opposed by Forest & Bird [FS23.018])
General opposition	<p>WFF seeks retention of the operative NRP rules with regard to Rules WH.R19 and P.R18.</p> <p>Ian Stewart opposes Rule WH.R19 on the basis vegetation clearance is more appropriately addressed by District Plans and seeks it is deleted.</p>	<p>WFF [S193.096] (supported by Meridian [FS47.246], opposed by Forest & Bird [FS23.1052]) and [S193.145] (supported by Meridian [FS47.385], opposed by Forest & Bird [FS23.1101])</p> <p>Ian Stewart [S32.011]</p>
Alignment with NES-CF	<p>Forest Enterprises consider Rules WH.R19 and P.R18 do not acknowledge the NES-PF/CF.</p> <p>PF Olsen seeks alignment of Rules WH.R19 and P.R18 with the NES-CF standards for vegetation clearance, a more scientific approach and consideration of positive effects of well managed forests.</p> <p>CFG notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ Forest Accord. CFG considers Rules WH.R19 and P.R18 create unnecessary overlap, cost and confusion. CFG seeks removal of Rules WH.R19 and P.R18 and to align requirements with the NES-CF.</p>	<p>Forest Enterprises [S111.012] and [S111.018] (supported by Pukerua Holdings [FS30.062], [FS30.063], [FS30.064] and [FS30.065])</p> <p>PF Olsen [S18.059] and [S18.060]</p> <p>CFG [S288.068] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.113], opposed by Forest &</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		Bird [FS23.092]) and [S288.112] (opposed by Forest & Bird [FS23.136])
Neutral subject to relief on other rules	Horokiwi Quarries are neutral on Rule WH.R19, subject to relief on Rules WH.R17 and WH.R18 being granted. Similarly, Winstone Aggregates and Transpower are neutral on Rules WH.R19 and P.R19, subject to their relief sought on other vegetation clearance rules being granted.	Horokiwi Quarries [S2.036] Winstone Aggregates [S206.058] (supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.023]) and [S206.086] Transpower [S177.040] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.026], opposed by Forest & Bird [FS23.783]) and [S177.066] (opposed by Forest & Bird [FS23.809])
Neutral	Mangaroa Farms notes any further restrictive changes to these provisions (including Rule WH.R19) could negatively impact the day-to-day operations of Mangaroa Farms, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered. The submitter seeks retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms and any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission	Mangaroa Farms [S194.016]
Slash and debris	Yvonne Weeber seeks amendments to Rules WH.R19 and P.R18 to address slash and debris causing flooding in storm events.	Yvonne Weeber [S183.242] (supported by MPHRCI [FS27.242]) and [S183.324] (supported by MPHRCI [FS27.324])
Mapping and classification of highest erosion risk land	Horokiwi Quarries seeks review of the mapping and definition of erosion prone land with regard to Rule WH.R19. Winstone Aggregates seeks the same relief for both Rules WH.R19 and P.R18.	Horokiwi Quarries [S2.036] Winstone Aggregates [S206.058] (supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.023]) and [S206.086]

Issue 6: Schedule 33 Vegetation Clearance Erosion and Sediment Management Plan

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	Yvonne Weeber and Guardians of the Bays support Schedule 33 but no reasoning is given. EDS and Forest & Bird support the Schedule because it gives effect to the NPSFM.	Yvonne Weeber [S183.377] (supported by MPHRCI [FS27.377]) Guardians of the Bays [S186.173] (supported by MPHRCI [FS27.596]) EDS [S222.137] (supported by Forest & Bird [FS23.293], supported by MPHRCI [FS27.1029], opposed by NZFFA [FS9.318]) Forest & Bird [S261.233] (supported by MPHRCI [FS27.852], opposed by NZFFA [FS9.560])
Neutral	Mangaroa Farms notes any further restrictive changes could negatively impact the day-to-day operations of Mangaroa Farms and seeks retention of notified provisions, or active involvement in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.020]
General opposition	PF Olsen consider an ESMP for forestry activities is redundant as these are already managed under the NES-CF and request deletion of the schedule and defaulting to the NES-CF WFF refers to their general comments regarding sediment from land disturbance in their original submission and seek deletion of the Schedule and any consequential amendments necessary to give effect to the relief sought. CFG request separating out non-plantation vegetation clearance associated with plantation forest activities and removing Schedule 33 and aligning with NES-CF for non-plantation vegetation clearance	PF Olsen [S18.070] WFF [S193.170] (opposed by Forest & Bird [FS23.1126]) CFG [S288.121] (opposed by Forest & Bird [FS23.145])
Support in principle with amendments	NZTA supports the general principle of a management plan but considers the range of detailed matter is overly prescriptive, particularly when combined with rules that require plans to be prepared in accordance with Schedule 33 (suggesting non-compliance with the detail of Schedule 33 may lead to a change in activity status).	NZTA [S275.049] (opposed by Forest & Bird [FS23.743])
Reference to GWRC's ESC Guidelines	UHCC seeks inclusion of reference to Greater Wellington Regional Council's Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021) in the Schedule for consistency across the plan	UHCC [S225.122] (opposed by Forest & Bird [FS23.950])
A Purposes of the ESMP	General support Yvonne Weeber and Guardians of the Bays support the purpose but no reasoning is given or relief sought. EDS and Forest & Bird support the purpose of the ESMP because it gives effect to the NPSFM but no relief is sought.	Yvonne Weeber [S183.378] (supported by MPHRCI [FS27.378]) Guardians of the Bays [S186.174] supported by MPHRCI [FS27.597]); [S186.178] (supported by MPHRCI [FS27.601]) EDS [S222.138] (supported by Forest & Bird [FS23.294], supported by MPHRCI [FS27.1030], opposed by NZFFA [FS9.319]) Forest & Bird [S261.234] (supported by MPHRCI [FS27.853], opposed by NZFFA [FS9.561])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	General opposition WFF refers to their general comments regarding sediment from land disturbance in their original submission and seek deletion of the Schedule and any consequential amendments necessary to give effect to the relief sought.	WFF [S193.171] (opposed by Forest & Bird [FS23.1127])
B Management objectives	General support Yvonne Weeber supports the management objectives with no reasons or relief sought EDS and Forest & Bird support the management objectives because they give effect to the NPSFM.	Yvonne Weeber [S183.379] (supported by MPHRCI [FS27.379]) EDS [S222.139] (supported by Forest & Bird [FS23.295], supported by MPHRCI [FS27.1031], opposed by NZFFA [FS9.320]) Forest & Bird [S261.235] (supported by MPHRCI [FS27.854], opposed by NZFFA [FS9.562])
	General opposition WFF refers to their general comments regarding sediment from land disturbance in their original submission and seek deletion of the Schedule and any consequential amendments necessary to give effect to the relief sought	WFF [S193.172] (opposed by Forest & Bird [FS23.1128])
	Objective (b) natural state Donald Love and NZFFA Wellington cite concerns about the term “natural state”. Donald Love seeks a definition for natural state and NZFFA Wellington seeks deletion of Clause B due to uncertainty about what is meant by natural state	Donald Love [S102.004] NZFFA Wellington [S36.048]
	Objective (d) revegetation Donald Love, Horokiwi Quarries and Winstone Aggregates seek amendments to recognize that revegetation is not always practicable Transpower consider providing for revegetation of land below or near National Grid transmission lines or structures could compromise safe operation of the National Grid, and considers this should be acknowledged in clause (d) in order to give effect to Policy 10 of the NPSET NZTA suggests a range of matters appear to be overly onerous or uncertain and management objectives require pre-development levels of discharge regardless of current land use, and the objectives assume land use will be revegetated but this may not be the case where new infrastructure or buildings are proposed	Donald Love [S102.004] Horokiwi Quarries [S2.042] Winstone Aggregates [S206.092] Transpower [S177.077] (opposed by Forest & Bird [FS23.820]) NZTA [S275.049] (opposed by Forest & Bird [FS23.743])
C Requirements of the ESMP	General support Yvonne Weeber and Guardians of the Bays support the requirements of the ESMP with no reasons or relief sought EDS and Forest & Bird support the requirements of the ESMP because they give effect to the NPSFM.	Yvonne Weeber [S183.380] (supported by MPHRCI [FS27.380]) and [S183.381] (supported by MPHRCI [FS27.381]) Guardians of the Bays [S186.175] (supported by MPHRCI [FS27.598]) and [S186.176] (supported by MPHRCI [FS27.599]) EDS [S222.140] (supported by Forest & Bird [FS23.296], supported by MPHRCI [FS27.1032], opposed by NZFFA [FS9.321]) and [S222.141] (supported by Forest & Bird [FS23.297], supported by MPHRCI [FS27.1033], opposed by NZFFA [FS9.322]) Forest & Bird [S261.236] (supported by MPHRCI [FS27.855], opposed by NZFFA [FS9.563]) and [S261.237] (supported by

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		MPHRCI [FS27.856], opposed by NZFFA [FS9.564])
	General opposition WFF refers to their general comments regarding sediment from land disturbance in their original submission and seek deletion of the Schedule and any consequential amendments necessary to give effect to the relief sought	WFF [S193.173] (opposed by Forest & Bird [FS23.1129]) and [S193.174] (opposed by Forest & Bird [FS23.1130])
	Practicality of revegetation (clause (c)(v)) Transpower considers clause (c)(v) of section C1 should be amended to recognise it is inappropriate to undertake revegetation on land located underneath or near National Grid transmission lines or support structures Willowbank have not stated a position but note that it's not always possible to establish woody vegetation due to differing land qualities such as soil type, soil depth, and exposed ridgelines. Willowbank seek an amendment to clause C1(c)(v) to include “where practicable” after “woody vegetation”	Transpower [S177.078] (opposed by Forest & Bird [FS23.821]) Willowbank [S204.008]
	Critical source areas and hotspots for sediment loss to surface water Transpower and Ara Poutama seek clarity on the terms ‘critical source areas’ and ‘hotspots for sediment loss to surface water’	Transpower [S177.078] (opposed by Forest & Bird [FS23.821]) Ara Poutama [S248.076] and [S248.077]
	Level of detail NZTA notes operating systems and practices (clause(c)) appears to be more focused on forestry activities and considers the maps referenced in (b)(viii) require an inappropriately high level of detail for smaller areas of vegetation clearance but could be suitable for large scale clearance	NZTA [S275.049] (opposed by Forest & Bird [FS23.743])
D Amendments of the ESMP	General support Yvonne Weeber and Guardians of the Bays support section D with no reasons stated or relief sought. EDS and Forest & Bird consider GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk	Yvonne Weeber [S183.382] (supported by MPHRCI [FS27.382]) Guardians of the Bays [S186.177] (supported by MPHRCI [FS27.600]) EDS [S222.142] (supported by Forest & Bird [FS23.298], MPHRCI [FS27.1034], opposed by NZFFA [FS9.323]) Forest & Bird [S261.238] (supported by MPHRCI [FS27.857], opposed by NZFFA [FS9.565])
	General opposition WFF refers to their general comments regarding sediment from land disturbance in their original submission and seek deletion of the Schedule and any consequential amendments necessary to give effect to the relief sought	WFF [S193.175] (opposed by Forest & Bird [FS23.1131])

Issue 7: Plantation forestry scope of PC1

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Note related to forestry rules prevailing over NES-FW	<p>EDS notes "vegetation clearance" is defined to not include commercial forest trees and there is a need to clarify whether Rules WH.R17 - 20 apply to commercial forestry activities. The "Note" in Rules WH.R19 and P.R18 says that the rules prevail over the NES-PF but those rules relate to commercial harvesting. EDS supports the NRP imposing greater stringency than the NES-PF and NES-CF.</p> <p>NZFFA Wellington suggest reference to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 in Rule WH.R19 should instead refer to NES Commercial Forestry or NES Plantation Forestry</p> <p>GWRC notes references in Rules WH.R20 and P.R19 are to the incorrect regulation and seeks amendments as follows: <i>Resource Management (National Environmental Standards for Freshwater Commercial Forestry) Regulations 2020-2017</i></p> <p>NZCF seeks the 'Note' that precedes Rules WH.R20 and P.R19 be amended to reference NESPF 2017.</p>	<p>EDS [S222.059] (supported by Forest & Bird [FS23.215], MPHRCI [FS27.951], opposed by NZFFA [FS9.240]) and [S222.101] (supported by Forest & Bird [FS23.257], MPHRCI [FS27.993], opposed by NZFFA [FS9.282])</p> <p>NZFFA Wellington [S36.042] and [S36.044]</p> <p>GWRC [S238.014] (supported by Forest & Bird [FS23.317]) and [S238.026] (supported by Forest & Bird [FS23.329])</p> <p>NZCF [S263.021] (opposed by Forest & Bird [FS23.392]); [S263.022] (opposed by Forest & Bird [FS23.393]) and [S263.026] (opposed by Forest & Bird [FS23.397])</p>
Replanting	<p>GWRC⁴ notes replanting is an element of commercial forestry that is intended to be included in rules WH.R20 and P.R19, WH.R21 and P.R20 and WH.R22 and P.R21 and seek amendments to include replanting in these rules.</p> <p>Southern North Island Wood Council⁵ seeks replanting not be regulated in PC1.</p>	See footnotes
Duplication of rules	<p>Woodridge considers:</p> <ul style="list-style-type: none"> Rule P.R19 repeats Rule WH.R20 and should be deleted and Rules P.R19 and WH.R20 combined into one rule. Rule P.R20 repeats Rule WH.R21 and as such is unnecessary and seeks Rules P.R20 and WH.R21 are combined into one rule. Rule P.R21 repeats Rule WH.R22 and as such is unnecessary and seeks Rules P.R21 and WH.R22 are combined into one rule. 	Woodridge [S255.069]; [S255.070] and [S255.071]

⁴ GWRC [S238.015] (supported by Forest & Bird [FS23.318], NZCF [FS50.063]) and [S238.027] (supported by Forest & Bird [FS23.330], NZCF [FS50.066]); [S238.016] (supported by Forest & Bird [FS23.319], NZCF [FS50.064]); [S238.028] (supported by Forest & Bird [FS23.331], NZCF [FS50.067]); [S238.017] (supported by Forest & Bird [FS23.320], NZCF [FS50.065]) and [S238.029] (supported by Forest & Bird [FS23.332], NZCF [FS50.068])

⁵ Southern North Island Wood Council [S262.015] (supported by NZCF [FS50.141]); [S262.020] (supported by NZCF [FS50.144]); [S262.016] (supported by NZCF [FS50.142]); [S262.021] (supported by NZCF [FS50.145]) [S262.017] (supported by NZCF [FS50.143]) and [S262.022] (supported by NZCF [FS50.146])

Issue 8: Policies WH.P28 and P.P26

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	<p>Yvonne Weeber supports Policy WH.P28 and P.P26. Fish and Game and Taranaki Whānui support Policy WH.P28. No reasons or relief sought are provided by these submitters.</p> <p>PCC seek Policy P.P28 is retained as notified.</p>	<p>Yvonne Weeber [S183.218] (supported by MPHRCI [FS27.218]) and [S183.301] (supported by MPHRCI [FS27.301])</p> <p>Fish and Game [S188.063] (supported by Forest & Bird [FS23.1219], MPGC [FS21.068], MPHRCI [FS27.1152], opposed by NZFFA [FS9.063])</p> <p>Taranaki Whānui [S286.059] (supported by Rangitāne [FS24.059])</p> <p>PCC [S240.057] (opposed by NZFFA [FS9.154])</p>
Neutral	Mangaroa Farms is neutral on Policy WH.P28 and seek retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms.	Mangaroa Farms [S194.012]
General opposition	<p>NZFFA object to all policies (including Policies WH.P28 and P.P26) as they relate to plantation forestry and Southern North Island Wood Council seeks removal of Policies WH.P28 and P.P26 as far as they relate to forestry.</p> <p>WFF considers Policy WH.P28 and Rule WH.R22 (requiring plantation forestry is not established or continued beyond the harvest of existing plantation forests on highest erosion risk land) to be a draconian approach that ignores technological advances forestry harvesters have made to harvest practices. WFF considers the policy an example of managed retreat’ for the public good, with all the cost borne by the landowner. WFF suggests there will be challenges sourcing sufficient seed stock for planting, finding labour to plant native seed stock and sourcing, and paying for specialist advice to ensure new plantings occur in a way that is consistent with ETS eligibility criteria and conversion of exotic forest to permanent forest presents difficulties under the ETS. WFF request the policy be amended to enable the replanting of production forests so long as landowners can identify (through a consent application) how the management and harvest of the forest will be achieved without adverse effects on sediment in water bodies. WFF furthermore considers Policies WH.P28 and P.P26 are addressed by national and regional regulation and seek deletion of the policies.</p> <p>NZCF opposes Policies WH.P28 and P.P26 for all of the reasons set out in their original submission. NZCF seeks clause (b) is amended to remove the requirement for ESMPs and reflect current best practice and seeks that clause (a) and (c) are deleted because:</p> <ul style="list-style-type: none"> In relation to clause (a): <ul style="list-style-type: none"> the rationale for, and appropriateness of, the approach to the identification of highest erosion risk land (plantation forestry) is not clearly set out; the rationale for departing from the erosion susceptibility classification in the NESPF is not set out in the manner required by section 32(4) of the RMA; the practical implications of mapping and associated provisions have not been considered, including extent to which the mapped areas result in greater constraints because matters such as scale, ownership and topography may result in larger areas no longer being viable for forestry uses. In relation to clause (c), preventing establishment of plantation forestry, or continuation of plantation forestry: <ul style="list-style-type: none"> is not supported by evidence and may not result in outcome sought, being reduced sediment in rivers; is not necessary or appropriate to give effect to any provision of a higher order planning instrument; is inconsistent with recommendations in the Te Whaitua te Whanganui-a-Tara Implementation Programme and the Te Awarua-o-Porirua Whaitua: Whaitua Implementation Programme; and is contrary to New Zealand’s Emissions Reduction Plan and New Zealand’s National Adaptation Plan <p>CFG considers Policies WH.P28 and P.P26 enable rules based on insufficient data, are not aligned with whaitua committee recommendations, and are not supported by Council’s data. CFG suggests the rules are not practicable and will result in the write-off of larger areas than expected and that neither the</p>	<p>NZFFA [S195.037] (opposed by Forest & Bird [FS23.440])</p> <p>Southern North Island Wood Council [S262.014] and [S262.019]</p> <p>WFF [S193.012] (supported by NZCF [FS50.150], opposed by Forest & Bird [FS23.968]); [S193.088] (supported by NZCF [FS50.151], opposed by Forest & Bird [FS23.1044]) and [S193.137] (supported by NZCF [FS50.155], opposed by Forest & Bird [FS23.1093])</p> <p>NZCF [S263.020] (opposed by Forest & Bird [FS23.391]) and [S263.025] (opposed by Forest & Bird [FS23.396])</p> <p>CFG [S288.056] (supported by NZCF [FS50.020], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.109], opposed by Forest & Bird [FS23.080]) and [S288.099] (supported by NZCF [FS50.024], opposed by Forest & Bird [FS23.123])</p> <p>NZFFA Wellington [S36.040] (supported by NZCF [FS50.174]) and [S195.038] (opposed by Forest & Bird [FS23.441])</p> <p>UHCC [S225.090] (supported by NZCF [FS50.147], opposed by Forest & Bird [FS23.918])</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>efficacy of the existing regulatory framework under the NES-PF/CF, nor the benefits of the proposal, have been adequately identified and questions GWRCs approach to consultation with the sector</p> <p>NZFFA Wellington considers Policy WH.P28 is misguided, noting Wellington, Hutt Valley and Porirua hills are greywacke, with low risk of shallow landslide and no evidence is provided which suggests steepest slopes are a significant source of sediment after forest harvest. NZFFA Wellington considers earthworks before and during harvest are a more likely source of sediment and withdrawing plantation forestry from steepest slopes could have unintended consequences and increase risk of sediment loss, noting there are alternative ways to mitigate risk of sediment loss from steep land.</p> <p>UHCC note Policy WH.P28 appears to conflict with the NES-CF and seeks its deletion.</p>	
Clause (c)	<p>PF Olsen considers the prohibition of forestry activities in high erosion areas is too restrictive, resulting in economic burden and triggering liabilities under the ETS and seeks greater alignment of Policies WH.P28 and P.P26 with the NES-CF.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate oppose the intent of Policy WH.P28 which results in the introduction of prohibited activity Rule WH.R22 and carries into Schedule 34 and seeks commercial forestry activities be managed through the NES-CF which they consider is appropriate and justified. The submitter does not consider the implementation of the PC1 objectives requires or justifies the use of a prohibited activity rule approach and seek deletions or amendments to the mapping; or deletion of clause (c)</p> <p>Ara Poutama notes the practicality of planting in natives can be challenging and forestry owners might not replant the land at all. Planting with pine provides benefits for erosion-prone land and Policies WH.P28 and P.P26 could be counter productive and appear contrary to the ETS which requires forests registered to the scheme are replanted after harvesting. Ara Poutama seeks deletion of clause (c) of Policies WH.P28 and P.P26 and notes consequential relief it is seeking on Schedule 34.</p> <p>Forest & Bird seek retention of clause (c) for Policies WH.P28 and P.P26.</p> <p>Donald Love regarding Policy P.P26, considers risks should be assessed as the impacts of another rotation on tracked and managed land could be worse than other options and seeks that there be no new forestry on highest erosion land but additional rotations of existing forestry should be considered on impact.</p>	<p>PF Olsen [S18.028] (supported by NZCF [FS50.125]) and [S18.054] (supported by NZCF [FS50.129])</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.034] (supported by NZCF [FS50.071])</p> <p>Ara Poutama [S248.025] (supported by NZCF [FS50.006]) and [S248.049] (supported by NZCF [FS50.009])</p> <p>Forest & Bird [S261.089] (supported by MPHRCI [FS27.708], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.036], NZCF [FS50.052], NZFFA [FS9.416]) and [S261.168] (supported by MPHRCI [FS27.787], opposed by NZCF [FS50.055], NZFFA [FS9.495])</p> <p>Donald Love [S102.002] (supported in part by NZCF [FS50.031])</p>
Additional criteria	<p>EDS and Forest & Bird seek setbacks and alternative harvesting methods in Policies WH.P28 and P.P26 that do not clear fell trees and spatially and/or temporally limit harvesting, and/or a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out).</p>	<p>EDS [S222.048] (supported by Forest & Bird [FS23.204], MPHRCI [FS27.940], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.065], NZCF [FS50.046], NZFFA [FS9.229]) and [S222.091] (supported by Forest & Bird [FS23.247], MPHRCI [FS27.983], opposed by NZCF [FS50.049], NZFFA [FS9.272])</p> <p>Forest & Bird [S261.089] (supported by MPHRCI [FS27.708], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.036], NZCF [FS50.052], NZFFA [FS9.416]) and [S261.168] (supported by MPHRCI [FS27.787], opposed by NZCF [FS50.055], NZFFA [FS9.495])</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Mapping and classification of highest erosion risk land	Guildford Timber, Silverstream Forest and Goodwin Estate seek deletion or amendment of the mapping of highest erosion risk land (plantation forestry) to a higher quality with regard to Policy WH.P28.	Guildford Timber, Silverstream Forest and Goodwin Estate [S210.034] (supported by NZCF [FS50.071])

Issue 9: Rules WH.R20 and P.R19

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	Taranaki Whānui supports Rule WH.R20 in principle and seek it retained as notified. PCC supports reduction of sediment from forestry and seeks Rule P.R19 is retained as notified.	Taranaki Whānui [S286.084] (supported by Rangitāne [FS24.084]) PCC [S240.077] (opposed by NZFFA [FS9.174])
Neutral stance	Mangaroa Farms is neutral on Rule WH.R20 and seek retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Ara Poutama is neutral on Rule WH.R20, subject to their relief on Schedule 34 being granted.	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.017] Ara Poutama [S248.038]
General opposition	WFF seeks to retain the operative NRP rule and that Rules WH.R20 and P.R19 are deleted. Regarding Rule WH.R20, Peter Kiernan considers without local scientific data that changes to the forestry rules are not justified. Dougal Morrison is concerned that if highly erodible land is unable to be re-planted it will result in unmanaged forests and associated problems and seeks deletion of Rule P.R19.	WFF [S193.097] (supported in part by NZCF [FS50.152], opposed by Forest & Bird [FS23.1053]) and [S193.146] (supported in part by NZCF [FS50.156], opposed by Forest & Bird [FS23.1102]) Peter Kiernan [S54.003] (supported by NZCF [FS50.119]) Dougal Morrison [S3.016]
Alignment with NES-CF	Forest Enterprises opposes Rules WH.R20 and P.R19 as they do not acknowledge the precedence of the NES-PF and NES-CF. PF Olsen is concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF and that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. PF Olsen considers the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities and is concerned there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. PF Olsen feels pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. PF Olsen seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests and that Rules WH.R20 and P.R19 be amended to recognize the permitted activity status of the NES-CF. NZFFA considers PC1 rules should not override the NES-PF until that need is proven and seeks deletion of rules (including WH.R20 and P.R19) that are more stringent than the NES-CF. Guildford Timber, Silverstream Forest and Goodwin Estate oppose the controlled activity status for plantation (commercial) forestry not on high erosion risk land (pasture) or highest erosion risk land (pasture) as they consider the matters being provided for by the rule are already appropriately controlled through the NES-CF and seek the rule be deleted in its entirety. Should GWRC decline this submission point, submitter seeks Rule WH.R20 be amended to be consistent with, and not more restrictive than, the NES-CF. UHCC notes Rule WH.R20 does not appear to align with requirements of NESCF and seeks it is deleted. Southern North Island Wood Council considers the rules of PC1 should not override the NES-CF and seeks that Rules WH.R20 and P.R19 and any associated notes that say the rule prevails over the NES-CF are deleted. CFG considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost for unquantified benefit. CFG seek removal of Rules WH.R20 and P.R19 and to align requirements with the NES-CF.	Forest Enterprises [S111.013] and [S111.019] PF Olsen [S18.034] (supported by NZCF [FS50.126]) and [S18.061] (supported by NZCF [FS50.130]) NZFFA [S195.029] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.078], supported by NZCF [FS50.096], opposed by Forest & Bird [FS23.432]) and [S195.032] (supported by NZCF [FS50.099], opposed by Forest & Bird [FS23.435]) Guildford Timber, Silverstream Forest and Goodwin Estate [S210.048] (supported by NZCF [FS50.072]) UHCC [S225.105] (supported by NZCF [FS50.148], opposed by Forest & Bird [FS23.933]) Southern North Island Wood Council [S262.015] (supported by NZCF [FS50.141]) and [S262.020] (supported by NZCF [FS50.144]) CFG [S288.069] (supported by NZCF [FS50.021], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.114], opposed by Forest & Bird [FS23.093]) and [S288.113]

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		(supported by NZCF [FS50.025], opposed by Forest & Bird [FS23.137])
Slash and debris	Yvonne Weeber considers Rules WH.R20 and P.R19 require amendment to address slash and debris causing flooding in storm events.	Yvonne Weeber [S183.243] (supported by MPHRCI [FS27.243], opposed by NZCF [FS50.184]) and [S183.325] (supported by MPHRCI [FS27.325], opposed by NZCF [FS50.187])
Higher activity status	EDS and Forest & Bird seek a higher activity status for Rules WH.R20 and P.R19. EDS seeks restricted discretionary or discretionary and Forest & Bird seeks discretionary alongside any further consequential or alternative relief as may be necessary and appropriate to address concerns.	EDS [S222.060] (supported by Forest & Bird [FS23.216], MPHRCI [FS27.952], opposed in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.067], opposed by NZCF [FS50.047], NZFFA [FS9.241]) and [S222.102] (supported by Forest & Bird [FS23.258], supported by MPHRCI [FS27.994], opposed by NZCF [FS50.050], NZFFA [FS9.283]) Forest & Bird [S261.113] (supported by MPHRCI [FS27.732], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.042], opposed by NZCF [FS50.053], NZFFA [FS9.440]) and [S261.190] (supported by MPHRCI [FS27.809], opposed by NZCF [FS50.056], NZFFA [FS9.517])
Concerns with conditions	NZFFA across multiple submission points ⁶ raises the following concerns with the conditions in Rules WH.R20 and P.R19: <ul style="list-style-type: none"> the classification of land as high or highest risk does not express the absolute risk, rather relative risk and is commercially and environmentally unsound, and appears biased against forestry. information requirements in Schedule 34 may not be known because forests are generally harvested when they are between 25 and 60 years old when harvesting or management techniques may have evolved and questions why the information requested is required. In relation to afforestation considers planting trees does not significantly increase the erosion risk or sediment discharge from land and planting timber trees has no greater effect on water quality than planting apple trees or cabbages. Due to this, there is considered to be no benefit in requiring an erosion and sediment management plan certified by a registered Forestry Adviser. Considers these rules impractical as when a heavy rain event leads to the visual clarity exceeding the target condition at a single measurement site in the catchment, no further afforestation can take place until all measurement sites show acceptable values again. The rules create an anomaly as pasture areas with a high erosion risk must be retired to woody vegetation regardless of water clarity. However, if water clarity is poor, rules may prevent planting trees in non-erosion-prone forest land within the same catchment. A FMU may cover several distinct catchments but with only one measurement point. Considers a failure of visual clarity in one catchment should not affect the consented right to plant in another catchment within the same FMU. NZFFA suggests the rules are too broadly drafted. NZFFA questions whether GWRC has the staff or technical expertise to exercise matters of control 1 and 2 and seeks they are removed. 	NZCF [S263.021] (opposed by Forest & Bird [FS23.392]); [S263.022] (opposed by Forest & Bird [FS23.393]) and [S263.027] (opposed by Forest & Bird [FS23.398]) NZFFA Wellington [S36.043] (supported by NZCF [FS50.175])

⁶ NZFFA [S195.039] (opposed by Forest & Bird [FS23.442]), NZFFA [S195.040] (supported by NZCF [FS50.104], opposed by Forest & Bird [FS23.443]); [S195.043] (opposed by Forest & Bird [FS23.446]); [S195.046] (supported by NZCF [FS50.108], opposed by Forest & Bird [FS23.449]) and NZFFA [S195.041] (supported by NZCF [FS50.105], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.079], opposed by Forest & Bird [FS23.444]); [S195.042] (supported by NZCF [FS50.106], opposed by Forest & Bird [FS23.445]); [S195.044] (opposed by Forest & Bird [FS23.447])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<ul style="list-style-type: none"> NZFFA seeks removal of afforestation from P.R19 and WH.R20 or alternatively that for afforestation activities, conditions (b), (c) and (d) be removed and the ESC classification of erosion risk used in the NES-CF be applied <p>NZCF considers the s32 report does not establish controlled activity status is necessary or appropriate and the need for a resource consent to confirm compliance with the standards is unnecessarily onerous. NZCF is concerned the rule manages activities rather than effects and does not support the standard in clause (d) due to concerns about frequency of council monitoring and the ability for third parties to cause exceedances that affect compliance with the standard. NZCF seek specific amendments to Rule WH.R20 as follows:</p> <p><i>"WH.R20: Plantation forestry - permitted controlled activity</i></p> <p><i>The discharge of sediment to a surface waterbody associated with a Afforestation, harvesting, earthworks, vegetation clearance or mechanical land preparation for plantation forestry, and any associated discharge of sediment to a surface water body, is a permitted controlled activity providing the following conditions are met:</i></p> <p><i>....</i></p> <p><i>(ii) 30% in any other river, and</i></p> <p><i>(d) the most recent Wellington Regional Council monitoring record demonstrates that the measure of visual clarity for the relevant catchment does not exceed the target attribute state at any monitoring site within the relevant part Freshwater Management Unit set out in Table 8.4:</i></p> <p><i>Matters of control</i></p> <p><i>1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will be minimised, and will not increase the average annual sediment load for the part Freshwater Management Unit in which the plantation forestry is located</i></p> <p><i>2. The area, location and methods employed in the plantation forestry</i></p> <p><i>3. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan</i></p> <p><i>4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."</i></p> <p>NZCF seeks similar amendments for Rule P.R19:</p> <p><i>"P.R19: Plantation forestry - permitted controlled activity</i></p> <p><i>The discharge of sediment to a waterbody associated with the use of land for afforestation, harvesting, earthworks, or mechanical land preparation for plantation forestry, and any associated discharge of sediment to a surface water body, is a permitted controlled activity providing the following conditions are met:</i></p> <p><i>(ii) 30% in any other river, and</i></p> <p><i>(d) the most recent Wellington Regional Council monitoring record demonstrates that the measure of visual clarity for the relevant catchment does not exceed the target attribute state at any monitoring site within the relevant part Freshwater Management Unit set out in Tables 9.1 and 9.2:</i></p> <p><i>Matters of control</i></p> <p><i>1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will be minimised, and will not increase the average annual sediment load for the part Freshwater Management Unit in which the plantation forestry is located</i></p> <p><i>2. The area, location and methods employed in the plantation forestry</i></p> <p><i>3. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan</i></p> <p><i>4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."</i></p> <p>NZFFA Wellington makes the following comments regarding Rule WH.R20:</p> <ul style="list-style-type: none"> Regarding clause (a), questions why high erosion risk pasture does not go straight into plantation forestry, noting that only highest risk slopes were proposed to prohibit plantation forestry Regarding clause (b), considers it costly to prepare an ESMP, even if no steep erosion prone land is involved or proximity to water bodies Regarding clause (c), considers the discharge limit of 100g/m³ is impractical for forestry, particularly if landslides are involved. Considers it unreasonable to expect recently cleared slopes to produce no more sediment in water than that emerging from an intact canopy catchment upstream, even with sophisticated sediment controls. 	

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<ul style="list-style-type: none"> Regarding clause (d), considers visual clarity an invalid surrogate measure for suspended solids, noting visual clarity can be affected by peat colour. Seeks the TAS is reviewed and reset to allow for a natural brown water input. Considers it unreasonable to penalise based on visual clarity test results outside of a forestry operator’s control. Considers it unclear the effect of escalating plantation forestry to a discretionary activity. Regarding matter of control (1), notes forest activities with potential to release sediment are not the same every year, and that whole catchments are likely to be harvested concurrently. Regarding matter of control (2), concerned GWRC officials will determine area, location and methods used and the clause may prohibit forestry from otherwise suitable land and create health and safety concerns, where GWRC officials may override appropriate contractor operations <p>NZFFA Wellington seek:</p> <ul style="list-style-type: none"> deletion of 'high erosion risk pasture' in clause (a) amendments to clause (b) to exclude forests less than 20ha and not in red zoned land deletion of clause (c) and use of best practice guidelines to control sediment deletion of clause (d) Amend matter of control (1) to “Do not increase average sediment load between forest lifecycles” Delete matter of control (2) 	
Mapping and classification of highest erosion risk land	<p>NZFFA seek the ESC classification of erosion risk used in the NES-CF be applied for Rules WH.R20 and P.R19.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate seek better mapping in relation to Rule WH.R20.</p> <p>Louise Askin questions whether the mapping in relation to Rule WH.R20 is fit for purpose and seeks review against best practice mapping tools.</p>	<p>NZFFA [S195.041] (supported by NZCF [FS50.105], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.079], opposed by Forest & Bird [FS23.444]) and [S195.046] (supported by NZCF [FS50.108], opposed by Forest & Bird [FS23.449])</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.048] (supported by NZCF [FS50.072])</p> <p>Louise Askin [S9.025] (supported by NZCF [FS50.089])</p>

Issue 10: Rules WH.R21 and P.R20

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	<p>Taranaki Whānui seeks for Rule WH.R21 to be retained as notified.</p> <p>Forest & Bird seeks for Rules WH.R21 and P.R20 to be retained as notified.</p> <p>PCC seeks for Rule P.R20 to be retained as notified.</p>	<p>Taranaki Whānui [S286.085] (supported by Rangitāne [FS24.085])</p> <p>Forest & Bird [S261.114] (supported by MPHRCI [FS27.733], opposed by NZFFA [FS9.441]) and [S261.191] (supported by MPHRCI [FS27.810], opposed by NZFFA [FS9.518])</p> <p>PCC [S240.078] (opposed by NZFFA [FS9.175])</p>
Neutral	<p>Ara Poutama are neutral on Rules WH.R21 and P.R20, subject to their relief on Schedule 34 being granted.</p> <p>Mangaroa Farms are neutral on Rule WH.R21 and seek retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms.</p>	<p>Ara Poutama [S248.039] and [S248.062]</p> <p>Mangaroa Farms [S194.018]</p>
General opposition	<p>WFF seek to retain the operative NRP rule and delete Rules WH.R21 and P.R20.</p> <p>Regarding Rule WH.R21, Peter Kiernan considers that without local scientific data changes to the forestry rules are not justified.</p> <p>Dougal Morrison is concerned if highly erodible land is unable to be re-planted post-harvest it will result in unmanaged forests and associated problems and seeks deletion of Rule P.R20.</p>	<p>WFF [S193.098] (supported in part by NZCF [FS50.153], opposed by Forest & Bird [FS23.1054]) and [S193.147] (supported in part by NZCF [FS50.157], opposed by Forest & Bird [FS23.1103])</p> <p>Peter Kiernan [S54.004] (supported by NZCF [FS50.120])</p> <p>Dougal Morrison [S3.017]</p>
Alignment with NES-CF	<p>Forest Enterprises opposes Rules WH.R21 and P.R20 as they do not acknowledge the precedence of the NES-PF and NES-CF.</p> <p>NZFFA considers PC1 rules should not override the NES until that need has been proven and seeks deletion of rules (including Rules WH.R21 and P.R20) that are more stringent than the NES-CF.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate oppose the discretionary activity status for plantation (commercial) forestry that do not comply with one or more of the conditions of Rule WH.20 and consider the matters being provided for by the rule are already appropriately controlled through the NES-CF, which has just been through a review process and has been updated accordingly. The submitter does not consider there is any justification for PC1 addressing these matters and seek the rule be deleted in its entirety. Should the rule be retained, the submitter seeks the activity status for Rule WH.R21 be changed to restricted discretionary activity, with the matters of discretion restricted to the one or more conditions of Rule WH.R20 that cannot be met. The rule should be amended to be consistent with, and not more restrictive than, the NES-CF.</p> <p>Southern North Island Wood Council considers the rules of PC1 should not override the NES-CF and seeks that Rules WH.R21 and P.R20, and any associated notes that say the rules prevail over the NES-CF are deleted.</p> <p>UHCC notes the rule does not appear to align with the NES-CF and seeks its deletion</p> <p>CFG considers Rules WH.R21 and P.R20 subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost for unquantified benefit. CFG seek removal of Rules WH.R21 and P.R20 and to align requirements with the NES-CF.</p>	<p>Forest Enterprises [S111.014] and [S111.020]</p> <p>NZFFA [S195.030] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.080], supported by NZCF [FS50.097], opposed by Forest & Bird [FS23.433]) and [S195.033] (supported by NZCF [FS50.100], opposed by Forest & Bird [FS23.436])</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.049] (supported by NZCF [FS50.073])</p> <p>Southern North Island Wood Council [S262.016] (supported by NZCF [FS50.142]) and [S262.021] (supported by NZCF [FS50.145])</p> <p>UHCC [S225.106] (supported by NZCF [FS50.149], opposed by Forest & Bird [FS23.934])</p> <p>CFG [S288.070] (supported by NZCF [FS50.022], supported in part by Guildford Timber, Silverstream Forest and Goodwin</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		Estate [FS25.115], opposed by Forest & Bird [FS23.094]) and [S288.114] (supported by NZCF [FS50.026], opposed by Forest & Bird [FS23.138])
Slash and debris	Yvonne Weeber considers Rules WH.R21 and P.R20 require amendment to address slash and debris causing flooding in storm events.	Yvonne Weeber [S183.244] (supported by MPHRCI [FS27.244], opposed by NZCF [FS50.185]) and [S183.326] (supported by MPHRCI [FS27.326], opposed by NZCF [FS50.188])
Consequential amendments	EDS seek amendments to Rules WH.R21 and P.R20 as a consequence of changes requested to Rule WH.R20.	EDS [S222.061] (supported by Forest & Bird [FS23.217], supported by MPHRCI [FS27.953], opposed by NZCF [FS50.048], opposed by NZFFA [FS9.242]) and [S222.103] (supported by Forest & Bird [FS23.259], MPHRCI [FS27.995], opposed by NZCF [FS50.051], NZFFA [FS9.284])
More permissive activity status	<p>PF Olsen is concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF and that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. PF Olsen considers the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities and is concerned there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. PF Olsen feels pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. PF Olsen seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests and that Rules WH.R21 and P.R20 be amended to controlled activity with criteria that can be met by landowners.</p> <p>NZCF notes the purpose of PC1 is to reduce sediment in rivers and that the proposed rule goes beyond management of discharges by managing activities more generally despite not always being a direct causal relationship and without consideration of methods that do not result in discharges. NZCF considers that potential adverse effects of a discharge of sediment to a river are sufficiently known and confined that restricted discretionary activity status is the most appropriate activity status to apply in circumstances where standards in Rule WH.R20 are not met, with ‘matters of control’ in Rule WH.R20 appropriate as ‘matters of discretion’. NZCF seeks Rule WH.R21 is amended as follows:</p> <p><i>"Rule WH.R21: Plantation forestry - <u>restricted</u> discretionary activity</i> <i>The discharge of sediment to a surface water body associated with a</i>A<i>fforestation, harvesting, earthworks, vegetation clearance or mechanical land preparation for plantation forestry and any associated discharge of sediment to a surface water body that does not comply with one or more of the conditions of Rule WH.R20 and is not a prohibited activity under Rule WH.R22 is a <u>restricted</u> discretionary activity.</i></p> <p><i><u>Matters of discretion</u></i> <i>1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will be minimised, and will not increase the average annual sediment load for the part Freshwater Management Unit in which the plantation forestry is located</i> <i>2. The area, location and methods employed in the plantation forestry</i> <i>3. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan</i> <i>4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."</i></p> <p>NZCF seeks the same amendments for Rule P.R20</p>	<p>PF Olsen [S18.035] (supported by NZCF [FS50.127]) and [S18.062] (supported by NZCF [FS50.131])</p> <p>NZCF [S263.023] (opposed by Forest & Bird [FS23.394]) and [S263.028] (opposed by Forest & Bird [FS23.399])</p>
Management approach	NZFFA questions why Rules R.P19, P.R20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment and why given that discharges from earthworks are much higher than discharges from forestry there is a more rigid limit for forestry activities than earthworks	NZFFA [S195.045] (supported by NZCF [FS50.107], opposed by Forest & Bird [FS23.448])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Mapping and classification of highest erosion risk land	NZFFA seeks to replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF.	NZFFA [S195.049] (supported by NZCF [FS50.111], opposed by Forest & Bird [FS23.452]) and [S195.045] (supported by NZCF [FS50.107], opposed by Forest & Bird [FS23.448])

Issue 11: Rules WH.R22 and P.R21

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	<p>EDS, Forest & Bird and Taranaki Whānui generally support Rule WH.R22. Forest & Bird and Taranaki Whānui seek Rule WH.R22 is retained as notified.</p> <p>EDS, PCC and Forest & Bird generally support Rule P.R21 and seek it is retained as notified.</p>	<p>EDS [S222.062] (supported by Forest & Bird [FS23.218], MPHRCI [FS27.954], opposed by NZFFA [FS9.243]) and [S222.104] (supported by Forest & Bird [FS23.260], MPHRCI [FS27.996], opposed by NZFFA [FS9.285])</p> <p>Forest & Bird [S261.115] (supported by MPHRCI [FS27.734], opposed by NZCF [FS50.054], NZFFA [FS9.442]) and [S261.192] (supported by MPHRCI [FS27.811], opposed by NZFFA [FS9.519])</p> <p>Taranaki Whānui [S286.086] (supported by Rangitāne [FS24.086])</p> <p>PCC [S240.079] (opposed by NZFFA [FS9.176])</p>
General opposition	<p>PF Olsen is concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF and that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. PF Olsen considers the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities and is concerned there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. PF Olsen feels pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. PF Olsen seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests and that Rules WH.R22 and P.R21 be deleted.</p> <p>WFF seek to retain the operative NRP rule and seek deletion of Rules WH.R22 and P.R21.</p> <p>Peter Kiernan considers that without local scientific data that changes to the forestry rules are not justified.</p> <p>NZFFA seek deletion of Rule WH.R22.</p> <p>Dougal Morrison is concerned if highly erodible land is unable to be re-planted post-harvest it will result in unmanaged forests and associated problems and seeks deletion of Rule P.R21.</p> <p>NZFFA Wellington considers the clause under Rule WH.R22 is too far reaching and is misguided and assumes that surficial erosion and shallow landslide from the most erosion prone slopes after harvest are the major cause of sediment loss into water bodies, with no evidence to support this. Notes “afforestation” is different from “replanting”. NZFFA Wellington suggests a number of other methods to mitigate the risk of sediment loss to water bodies in original submission and notes a working threshold relating to use of highest risk erosion prone land is required as the grid resolution is only 5m (=25m²) which is not a practical unit for management. NZFFA Wellington prefers the NES-CF prevail and failing that seek:</p> <ul style="list-style-type: none"> Removal of the word "afforestation" until more research data is available. A change to the clause title to not indicate that plantation forestry is prohibited. Review of the policy and engagement with forest industry and forest experts. Land areas with contiguous 'pixels' need to be larger than 1000m² for the regulations to apply. <p>Guildford Timber. Silverstream Forest and Goodwin Estate opposes Rule WH.R22 as they consider prohibited activity status is onerous and not justified by the objectives included in PC1, any adverse effects of a plantation (commercial) forestry can be considered through the NESCF provisions and such an onerous rule will adversely affect the viability of forestry industry in the Region with no consultation with industry and little evidence to support the approach. There also appears to be little consideration of the need to plant slopes to prevent erosion and the cost of doing so, without a return which will impose a significant burden on submitters. The submitter seeks the deletion of Rule WH.R22 in its entirety.</p>	<p>PF Olsen [S18.036] (supported by NZCF [FS50.128]) and [S18.063] (supported by NZCF [FS50.132])</p> <p>WFF [S193.099] (supported in part by NZCF [FS50.154], opposed by Forest & Bird [FS23.1055]) and [S193.148] (supported in part by NZCF [FS50.158], opposed by Forest & Bird [FS23.1104])</p> <p>Peter Kiernan [S54.005] (supported by NZCF [FS50.121])</p> <p>NZFFA [S195.050] (supported by NZCF [FS50.112], opposed by Forest & Bird [FS23.453])</p> <p>Dougal Morrison [S3.018]</p> <p>NZFFA Wellington [S36.045] (supported by NZCF [FS50.176])</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.050] (supported by NZCF [FS50.074])</p> <p>Mangaroa Farms [S194.019]</p> <p>NZCF [S263.024] (opposed by Forest & Bird [FS23.395]) and [S263.029] (opposed by Forest & Bird [FS23.400])</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>Urban Edge Planning Group on behalf of Mangaroa Farms Ltd considers prohibited activity status or Rule WH.R22 is overly restrictive and seek a non-complying activity status instead.</p> <p>NZCF opposes Rules WH.R22 and P.R21 and seeks their deletion for the following reasons:</p> <ul style="list-style-type: none"> there is neither a strong evidential basis nor objectives and policies (including in the WRPS, the NRP and the Proposed Plan Change) to justify applying the most extreme stringent approach to plantation forestry in particular locations the rules are overly stringent in circumstances where activities addressed by the rules can be undertaken in a way that does not result in sediment discharges to rivers. No consideration has been given to afforestation being undertaken in a manner that does not result in discharges the rules could result in an increase in discharges of sediment to rivers because continued use of the identified area for forestry is likely to reduce discharges over the life of a forest to a greater extent than other uses of the land, including retirement the rules restrict an activity rather than the particular effects of an activity (discharges to water) and that no direct causal relationship has been established for the activity and area such that prohibited activity status is appropriate or necessary prohibited activity status is inconsistent with, and contrary to, recommendations of Te Whaitua te Whanganui-a-Tara Implementation Programme and Te Awarua-o-Porirua Whaitua: Whaitua Implementation Programme, New Zealand's Emissions Reduction Plan and New Zealand's National Adaptation Plan 	
Alignment with NES-CF	<p>Forest Enterprises oppose Rules WH.R22 and P.R21 as they do not acknowledge the precedence of the NESPF and NESCF.</p> <p>NZFFA considers PC1 rules should not override the NES until that need has been proven and seeks deletion of rules that are more stringent than the NES-CF. NZFFA also questions why Rules WH.R20 – WH.R22 / P.R19 – P.R21 are not consistent with the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment and how given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. NZFFA seek deletion of Rules WH.R22 and P.R21.</p> <p>Southern North Island Wood Council considers the rules of PC1 should not override the NES-CF and seeks that Rules WH.R22 and P.R21 and any associated notes that say the rules prevails over the NES-CF are deleted.</p> <p>CFG considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost for unquantified benefit. CFG seek removal of Rules WH.R22 and P.R21 and align to requirements with the NES-CF.</p>	<p>Forest Enterprises [S111.015] and [S111.021]</p> <p>NZFFA [S195.031] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.081], supported by NZCF [FS50.098], opposed by Forest & Bird [FS23.434]); [S195.034] (supported by NZCF [FS50.101], opposed by Forest & Bird [FS23.437]) and [S195.050] (supported by NZCF [FS50.112], opposed by Forest & Bird [FS23.453])</p> <p>Southern North Island Wood Council [S262.017] (supported by NZCF [FS50.143]) and [S262.022] (supported by NZCF [FS50.146])</p> <p>CFG [S288.071] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.116], supported by NZCF [FS50.023], opposed by Forest & Bird [FS23.095]) and [S288.115] (supported by NZCF [FS50.027], opposed by Forest & Bird [FS23.139])</p>
Slash and debris	Yvonne Weeber considers Rules WH.R22 and P.R21 require amendment to address slash and debris causing flooding in storm events.	Yvonne Weeber [S183.245] (supported by MPHRCI [FS27.245], opposed by NZCF [FS50.186]) and [S183.327] (supported by MPHRCI [FS27.327], opposed by NZCF [FS50.189])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Conditional opposition	Ara Poutama seeks clarification as to what types and age of forestry the prohibition applies to. If the Rules WH.R22 and P.R21 only apply to new forests as per the definition of “afforestation” in the NES-CF, Ara Poutama considers the rules are reasonable but if rules apply to re-establishment of recently harvested forests, submitter considers prohibited activity status is unnecessarily onerous, and evidence in the Section 32 report does not support a Prohibited activity status. Ara Poutama considers there should be a consent pathway for re-establishing plantation forests after harvesting for reasons set out in its requested relief for Policies WH.P28 and P.P26 and seeks to amend Rules WH.R22 and P.R21 to enable a consent pathway for re-establishing plantation forests after harvesting.	Ara Poutama [S248.040] (supported by WMNZ [FS46.045], supported in part by NZCF [FS50.008]) and [S248.063] (supported in part by NZCF [FS50.011])
Mapping and classification of highest erosion risk land	NZFFA seeks to replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF	NZFFA [S195.050] (supported by NZCF [FS50.112], opposed by Forest & Bird [FS23.453])

Issue 12: Schedule 34 Plantation Forestry Erosion and Sediment Management Plan

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General support	Yvonne Weeber supports Schedule 34 but no reasoning is given. EDS and Forest & Bird support the Schedule as it gives effect to the NPSFM.	Yvonne Weeber [S183.383] (supported by MPHRCI [FS27.383]) EDS [S222.143] (supported by Forest & Bird [FS23.299], MPHRCI [FS27.1035], opposed by NZFFA [FS9.324]) Forest & Bird [S261.239] (supported by MPHRCI [FS27.858], opposed by NZFFA [FS9.566])
Neutral	Mangaroa Farms adopts a neutral provision to remain involved in any process that could see these provisions altered and seeks retention of notified provisions, or active involvement in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms, including any consequential changes or alternative relief required to achieve the intended outcomes sought	Mangaroa Farms [S194.021]
General opposition	PF Olsen consider an ESMP for forestry activities is redundant as these are already managed under the NES-CF and request deletion of the schedule WFF oppose the schedule referring to their general comments regarding sediment from land disturbance in their original submission and seek deletion and any consequential amendments necessary to give effect to the relief sought Guildford Timber, Silverstream Forest and Goodwin Estate consider Schedule 34 requirements overly onerous and would cause significant costs and potential delays in getting the management plan approved, suggesting the sediment management plan requirements should reflect the sediment management approach in the NES-CF CFG considers there is overlap with the NES-CF which creates confusion and adds little value and seeks alignment with the NES-CF Alan Bell & Associates is concerned Schedule 34 will have detrimental effects on forestry operations, produce negligible water quality improvements and lead to poor environmental outcomes and that not all Registered Forestry Advisers will have the expertise to develop suitable ESMPs. Alan Bell & Associates is also concerned about the lack of compensation and financial assistance for losses of workable land and broader economic impacts related to ETS obligations	PF Olsen [S18.071] (supported by NZCF [FS50.133]) WFF [S193.176] (opposed by Forest & Bird [FS23.1132]) Guildford Timber, Silverstream Forest and Goodwin Estate [S210.054] (supported by NZCF [FS50.075]) CFG [S288.122] (supported by NZCF [FS50.028], opposed by Forest & Bird [FS23.146]) Alan Bell & Associates [S48.003] (supported by NZCF [FS50.001])
Mapping and classification of highest erosion risk land	David and Carolyn Gratton, Alan Bell & Associates and NZFFA cite concerns with the mapping of erosion prone land which inform the need for or underpins the Schedule. David and Carolyn Gratton and NZFFA seek the replacement of the erosion risk classification used in PC1 with the MPI erosion susceptibility tool.	David and Carolyn Gratton [S58.004] (supported by NZCF [FS50.030]) Alan Bell & Associates [S48.003] (supported by NZCF [FS50.001]) NZFFA [S195.047] (supported by NZCF [FS50.109], opposed by Forest & Bird [FS23.450]); [S195.048] (supported by NZCF [FS50.110], opposed by Forest & Bird [FS23.451])
Reference to GWRC ESC Guidelines	UHCC seek reference to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021) for consistency across plan	UHCC [S225.123] (opposed by Forest & Bird [FS23.951])
A Purpose	General support Yvonne Weeber supports the purpose of the ESMP but no reasoning is given.	Yvonne Weeber [S183.384] (supported by MPHRCI [FS27.384])
	General opposition	WFF [S193.177] (opposed by Forest & Bird [FS23.1133])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	WFF oppose the purpose referring to their general comments regarding sediment from land disturbance in their original submission and seek deletion and any consequential amendments necessary to give effect to the relief sought	
	Reference to waterbodies NZCF seek an amendment to section A of Schedule 34 as follows: <i>“A Purpose of the Erosion and Sediment Management Plan</i> <i>The purpose of an Erosion and Sediment Management Plan is:</i> <i>(a) to identify the risks of the loss of sediment from the plantation forestry <u>to waterbodies</u>, and</i> <i>(b) identify management practices and mitigation measures to address these risks.</i>	NZCF [S263.030] (opposed by Forest & Bird [FS23.401])
B Management objectives	General support Yvonne Weeber and Guardians of the Bays support the management objectives but no reasoning is given and no relief is sought.	Yvonne Weeber [S183.385] (supported by MPHRCI [FS27.385]) Guardians of the Bays [S186.179] (supported by MPHRCI [FS27.602])
	General opposition WFF oppose the management objectives referring to their general comments regarding sediment from land disturbance in their original submission and seek deletion and any consequential amendments necessary to give effect to the relief sought	WFF [S193.178] (opposed by Forest & Bird [FS23.1134])
	Retain Management Objective B1 Donald Love notes there is a perception that forestry has been a significant contributor to sediment discharge and concern that good management practices have not been well defined or monitored and seeks retention of Objective B1	Donald Love [S102.005]
	Natural state NZFFA, Ara Poutama and Alan Bell & Associates cite concerns about the term natural state and NZFFA Wellington note natural state is not measurable at all scales	NZFFA [S195.051] (supported by NZCF [FS50.113], opposed by Forest & Bird [FS23.454]) Ara Poutama [S248.079] Alan Bell & Associates [S48.003] (supported by NZCF [FS50.001]) NZFFA Wellington [S36.031]
	Specific amendments to management objectives Guildford Timber, Silverstream Forest and Goodwin Estate opposes the requirements of Management Objective 4 which is implemented through Clause (c) of WH.P28 and seeks a re-write of the ESMP requirements to reflect the NES-CF and deletion of management objective 4 in any re-write	Guildford Timber, Silverstream Forest and Goodwin Estate [S210.054] (supported by NZCF [FS50.075])
	NZFFA considers the identification and classification of ‘highest erosion risk’ land relied on in Objective B(4) is unsuitable and seeks deletion of objectives B (2) and B (4) from Schedule 34	NZFFA [S195.051] (supported by NZCF [FS50.113], opposed by Forest & Bird [FS23.454])
	NZFFA Wellington considers the management objectives unrealistic and it is unreasonable to treat peak sediment loadings as if they occur at the same rate every year. NZFFA Wellington considers forestry harvest could not achieve the standards without sediment control measures of similar sophistication and scale to state highway roading, noting that rural land uses are not subject to the same expectations. NZFFA Wellington seeks the deletion of objectives B2 and B3 and if this is not implemented seeks raising the peak discharge standard to 1000g/m3 and amending so forestry sediment discharge is time averaged over the life cycle of the forest	NZFFA Wellington [S36.049]

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>Ara Poutama addresses a number of clauses within section B of the schedule as follows:</p> <ul style="list-style-type: none"> In relation to clause B(2), the term “avoid” is a very high and potentially unachievable threshold, and should be replaced with “minimise” Ara Poutama is neutral on clause B3, which aligns with its positions on Rules WH.R20 and P.R19 and seeks to retain clause B(3) as notified Seeks the term “revegetation” be clarified to include a range of vegetation types, including plantation forestry. Seeks deletion of clause B(4) 	Ara Poutama [S248.079]
	<p>NZCF makes the following comments on the management objectives:</p> <ul style="list-style-type: none"> The section is inappropriately expressed as a standard or rule and could be understood to be an absolute requirement; (4) appears to direct a single future use of the subject land and, in doing so, inappropriately erodes the ability for a landowner to make use of their property; Appears to have inappropriately (and without evidence) formed a view that woody revegetation is the only means to reduce sediment discharges to water. <p>NZCF seeks Section B be amended as follows:</p> <p><i>B Management objectives</i></p> <p><i>The Erosion and Sediment Management Plan must demonstrate that the measures adopted to address the identified risks <u>are designed to</u> will:</i></p> <p><i>1. minimise sediment loss <u>to waterbodies</u> from activities in the plantation forest by adopting, as a minimum, good management practice, and</i></p> <p><i>2. avoid an increase in risk of loss of sediment to water relative to the risk of loss that exists from the land in a natural state, and</i></p> <p><i>3. achieve the discharge standard in Rule WH.R20(c) or Rule P.R19(c) for any discharge of water and sediment from plantation forestry into a surface water body,</i></p> <p><i>4. provide for plantation forestry on highest erosion risk land (Plantation forestry) to progressively reduce and cease beyond the next harvest. This land is to be restored and revegetated with appropriate permanent woody species.</i></p>	NZCF [S263.030] (opposed by Forest & Bird [FS23.401])
C Requirements of the ESMP	<p>General support</p> <p>Yvonne Weeber and Guardians of the Bays support the requirements of the ESMP but no reasoning is given or relief sought.</p>	<p>Yvonne Weeber [S183.386] (supported by MPHRCI [FS27.386]); [S183.387] (supported by MPHRCI [FS27.387]); [S183.388] (supported by MPHRCI [FS27.388])</p> <p>Guardians of the Bays [S186.180] (supported by MPHRCI [FS27.603]); [S186.181] (supported by MPHRCI [FS27.604]); [S186.182] (supported by MPHRCI [FS27.605])</p>
	<p>General opposition</p> <p>WFF oppose the requirements of the ESMP referring to their general comments regarding sediment from land disturbance in their original submission and seek deletion and any consequential amendments necessary to give effect to the relief sought</p> <p>Ara Poutama seeks deletion of C1 and C2 because they duplicate the NES-CF and Council’s earthworks and sediment control management plan guidelines</p>	<p>WFF [S193.179] (opposed by Forest & Bird [FS23.1135]); [S193.180] (opposed by Forest & Bird [FS23.1136]) and [S193.181] (opposed by Forest & Bird [FS23.1137])</p> <p>Ara Poutama [S248.079]</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	No position Forest and Bird have submitted on the requirements of the ESMP with no reasons or relief sought.	Forest & Bird [S261.240] (supported by MPHRCI [FS27.859], opposed by NZFFA [FS9.567])
	Specific amendments NZFAA seeks deletion of Clause C1 (c) (iii) and clause C2 from the Schedule 34 requirements and notes the rules require the landowner to provide a certified ESMP that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification.	NZFFA [S195.047] (supported by NZCF [FS50.109], opposed by Forest & Bird [FS23.450])
	NZFFA Wellington opposes Schedule 34 on the basis the NES-CF requires an erosion and sediment control plan to be available on request and considers the requirement to prepare and consent an erosion plan 30 years ahead of soil disturbance is unreasonable and will not be affordable at a small scale. The submitter considers the cost of certification and prohibition of plantation forestry on steep slopes will disincentivise pastoral farms wishing to use plantation forestry for offsetting for greenhouse gas emissions. NZFFA Wellington seek removal of clauses C1(c)(iii) and C2 NZFFA Wellington is concerned smaller operators may not be able to comply with requirements and considers no justification is provided that the NES-CF will not deliver satisfactory outcomes. The submitter notes potential amendments to address alternative species, alternatives harvest techniques, and variations on permanent forest where partial harvesting is allowed and seeks Schedule 34 is deleted but if this relief is not granted, specifically seeks: <ul style="list-style-type: none"> • Amendments to not exclude afforestation/plantation forestry from steep land • Exclude woodlots covered by NES-CF, less than 20ha, and not containing red zoned land from controlled activity status; or default to NES-CF provisions • Provide exemptions from registering a full cycle plan and certified erosion control plan where small remnants of forest remain to be harvested, but where replanting is not intended e.g. for harvest operations to wind up within 30 years; or where forest operations are less than 20ha 	NZFFA Wellington [S36.050]
D Amendment of the ESMP	General support Yvonne Weeber and Guardians of the Bays support section D with no reasons given or relief sought. EDS and Forest & Bird consider GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk NZCF supports clause D to the extent there is the ability to amend an ESMP. The submitter considers providing the ability to make amendments is necessary to respond effectively and efficiently to site requirements	Yvonne Weeber [S183.389] (supported by MPHRCI [FS27.389]) Guardians of the Bays [S186.183] (supported by MPHRCI [FS27.606]) EDS [S222.144] (supported by Forest & Bird [FS23.300], MPHRCI [FS27.1036], opposed by NZFFA [FS9.325]) Forest & Bird [S261.241] (supported by MPHRCI [FS27.860], opposed by NZFFA [FS9.568]) NZCF [S263.030] (opposed by Forest & Bird [FS23.401])
	General opposition WFF oppose section D referring to their general comments regarding sediment from land disturbance in their original submission and seek deletion and any consequential amendments necessary to give effect to the relief sought	WFF [S193.182] (opposed by Forest & Bird [FS23.1138])

Issue 13: Definitions

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Afforestation	General support UHCC and Yvonne Weeber support the definition but no reasoning is given. UHCC seek to retain the definition as notified PF Olsen Ltd support consistency with the NES-CF and seek to retain the definition as notified NZCF seeks to retain the definition as notified noting the proposed definition refers to the NES-PF 2017 and does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes	UHCC [S225.028] (opposed by Forest & Bird [FS23.856]) Yvonne Weeber [S183.005] (supported by MPHRCI [FS27.005]) PF Olsen [S18.001] NZCF [S263.011] (opposed by Forest & Bird [FS23.382])
	Alignment with NES-CF CFG seek amendments to align with the definition in the NES-CF EDS note the definition refers to outdated regulations and seek the definition refers to the NES-CF	CFG [S288.021] (opposed by Forest & Bird [FS23.045]) EDS [S222.001] (opposed by NZCF [FS50.040], NZFFA [FS9.182], supported by Forest & Bird [FS23.157], MPHRCI [FS27.893])
	Full definition Forest and Bird seek that the full text of the definition is referenced including any further consequential or alternative relief as may be necessary and appropriate to address concerns	Forest & Bird [S261.012] (opposed by NZFFA [FS9.339], supported by MPHRCI [FS27.631])
Erosion and sediment management plan	General support Yvonne Weeber and Guardians of the Bays support the definition but no reasoning is given and no relief is sought NZCF is not sure a definition is required but seek to retain the definition as notified if necessary to support implementation of PC	Yvonne Weeber [S183.016] (supported by MPHRCI [FS27.016]) Guardians of the Bays [S186.010] (supported by MPHRCI [FS27.433]) NZCF [S263.013] (opposed by Forest & Bird [FS23.384])
	Reference to GWRC Erosion and Sediment Control Guidelines UHCC seeks inclusion of reference to the Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region for consistency across the plan	UHCC [S225.033] (opposed by Forest & Bird [FS23.861], neutral/not stated stance from Woodridge [FS16.048])
	Alignment with NES-CF CFG consider separate schedules and overlap between PC1 and the NES-CF creates confusion and seek PC1 work to schedules 4 and 5 of the NES-CF and avoid cross over and overlap with processes developed under the NES-CF	CFG [S288.023] (opposed by Forest & Bird [FS23.047], supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.108])
Harvesting	General support Yvonne Weeber supports the definition but no reasoning is given NZCF supports the definition noting the proposed definition refers to NESPF 2017 and as such does not address the establishment of permanent forests, including commercial forests for carbon sequestration purposes PF Olsen support consistency with the NES-CF and seek to retain the definition as notified	PF Olsen [S18.003] NZCF [S263.014] (opposed by Forest & Bird [FS23.385]) Yvonne Weeber [S183.020] (supported by MPHRCI [FS27.020])
	Alignment with NES-CF CFG seek amendments to align with the definition in the NES-CF EDS note the definition refers to outdated regulations and seek the definition refers to the NES-CF	CFG [S288.024] (opposed by Forest & Bird [FS23.048]) EDS [S222.003] (opposed by NZCF [FS50.042], NZFFA [FS9.184], supported

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		by Forest & Bird [FS23.159], MPHRCI [FS27.895])
	Exclusions of continuous cover and small coupe harvesting NZFFA seek exclusion of ‘continuous cover’ and ‘small coupe harvesting’ from the ‘harvesting’ definition	NZFFA [S195.024] (opposed by Forest & Bird [FS23.427])
	Full definition Forest & Bird seek that the full text is referenced to assist plan users and any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Forest & Bird [S261.016] (opposed by NZFFA [FS9.343], supported by MPHRCI [FS27.635])
Highest erosion risk land (plantation forestry)	General support Yvonne Weeber supports the definition but no reasoning is given and no relief is sought	Yvonne Weeber [S183.022] (supported by MPHRCI [FS27.022])
	General opposition John Easterher considers erosion varies within sub-catchments and cannot be determined through aerial scanning data and that erosion potential of all land must be based on site investigation and map 92 is only suitable as a tool to indicate where specific site investigation should be undertaken PF Olsen consider there is more research available to determine erosion risks and seek deletion of the mapping or peer review to establish its validity Winstone Aggregates oppose the definition and consider the mapping too high level and unsubstantiated and seek to retain the operative NRP definition for erosion prone land until a robust vegetation and land stability mapping exercise is undertaken. CFG and WFF consider the mapping is not fit for purpose and seek deletion of the definition. CFG requests GWRC consult properly and work with the industry NZCF seek deletion of the definition and Maps 92 and 95 in their entirety	John Easterher [S17.001] PF Olsen [S18.004] (supported by NZCF [FS50.124]) Winstone Aggregates [S206.025] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.019]) CFG [S288.028] (opposed by Forest & Bird [FS23.052]) WFF [S193.022] (opposed by Forest & Bird [FS23.978]) NZCF [S263.015] (opposed by Forest & Bird [FS23.386])
	Alignment with NES-CF Guildford Timber, Silverstream Forest and Goodwin Estate opposes mapping of ‘highest erosion risk land (plantation forestry)’ and ‘highest erosion risk land (woody vegetation)’ citing conflict between the NES-CF and the maps prepared by GWRC which include ‘highest erosion risk land (plantation forestry)’ over the submitters land. The submitter questions why there is such a variation in the classification of their site, and consider it is more appropriate for commercial forestry on their land to be managed through the NES-CF. The submitter considers the quality of the mapping is poor and it is difficult to tell where the areas start and finish on the submitter’s site due to the pixelation that occurs when zooming in on a particular area and that this poor mapping quality needs to be resolved so land users are able to determine where these areas are on their property, and to minimise compliance issues at a later date. The submitter seeks the following: <ul style="list-style-type: none"> management of commercial forestry activities on the submitters land be undertaken in accordance with the erosion susceptibility classification tool and the requirements of the NES-CF That PC1 definitions and provisions be deleted or the NRP be amended to be consistent with and take the same approach as the NES-CF Mapping of ‘highest erosion risk land (plantation forestry)’ and ‘highest erosion risk land (woody vegetation)’ to be improved to a higher quality so that when zooming in on a site on the map a resource user can easily determine where the relevant areas are located on a site. 	Guildford Timber, Silverstream Forest and Goodwin Estate [S210.007] (supported in part by NZCF [FS50.070])
	Amendments to definition NZFFA Wellington seeks amendments to the definition of highest risk erodible forest land by increasing the slope angle to above 30 degrees and taking into account underlying lithology. The submitter also seeks a technical peer review of the criteria that have been used by industry recognised experts and alignment with observed field data	NZFFA Wellington [S36.030] (supported by NZCF [FS50.171])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Highest erosion risk land (woody vegetation)	General support Yvonne Weeber supports the definition but no reasoning is given and no relief is sought UHCC supports the definition as it is consistent with areas identified as high slope in UHCC's Proposed Plan Change 47 and seek consistency with District Council hazard mapping	Yvonne Weeber [S183.025] (supported by MPHRCI [FS27.025]) UHCC [S225.038] (opposed by Forest & Bird [FS23.866])
	Neutral stance Ara Poutama and Transpower seek to retain the definition as notified, both noting submission points on the maps and provisions	Ara Poutama [S248.015] Transpower [S177.011] (opposed by Forest & Bird [FS23.754])
	General opposition John Easterher considers erosion varies within sub-catchments and cannot be determined through aerial scanning data and that erosion potential of all land must be based on site investigation and map 92 is only suitable as a tool to indicate where specific site investigation should be undertaken PF Olsen seeks more comprehensive information regarding highest erosion risk for woody vegetation and consider the supporting technical report is inadequate to substantiate provisions in PC1 and seeks deletion of the definition CFG and WFF consider the map process inappropriate for purpose and seek deletion of the definition Winstone Aggregates oppose the definition and consider the mapping too high level and unsubstantiated and seek to retain the operative NRP definition for erosion prone land until a robust vegetation and land stability mapping exercise is undertaken.	John Easterher [S17.004] (supported by Meridian [FS47.121]) PF Olsen [S18.006] CFG [S288.025] (opposed by Forest & Bird [FS23.049]) WFF [S193.025] (supported by Meridian [FS47.122], opposed by Forest & Bird [FS23.981]) Winstone Aggregates [S206.027] (supported by Meridian [FS47.123])
	Alignment with NES-CF Guildford Timber, Silverstream Forest and Goodwin Estate opposes mapping of 'highest erosion risk land (plantation forestry)' and 'highest erosion risk land (woody vegetation)' citing conflict between the NES-CF and the maps prepared by GWRC which include 'highest erosion risk land (plantation forestry)' over the submitters land. The submitter questions why there is such a variation in the classification of their site, and consider it is more appropriate for commercial forestry on its land to be managed through the NES-CF. The submitter considers the quality of the mapping is poor and difficult to tell where the areas shown on Maps 94 and 95 start and finish on the submitter's site due to the pixelation that occurs when zooming in on a particular area and that this poor mapping quality needs to be resolved so land users are able to determine where these areas are on their property, and to minimise compliance issues at a later date. The submitter seeks the following: <ul style="list-style-type: none"> management of commercial forestry activities on the submitters land be undertaken in accordance with the erosion susceptibility classification tool and the requirements of the NES-CF That PC1 definitions and provisions be deleted or the NRP be amended to be consistent with and take the same approach as the NES-CF Mapping of 'highest erosion risk land (plantation forestry)' and 'highest erosion risk land (woody vegetation)' to be improved to a higher quality so that when zooming in on a site on the map a resource user can easily determine where the relevant areas are located on a site. 	Guildford Timber, Silverstream Forest and Goodwin Estate [S210.007] (supported in part by NZCF [FS50.070])
Mechanical land preparation	General support PF Olsen supports consistency with the NES-CF and seek to retain the definition as notified Yvonne Weeber supports the definition but no reasoning is given and no relief is sought NZCF seeks to retain the definition noting the proposed definition refers to the NES-PF 2017 and does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes	PF Olsen [S18.007] Yvonne Weeber [S183.030] (supported by MPHRCI [FS27.030]) NZCF [S263.016] (opposed by Forest & Bird [FS23.387])
	Alignment with NES-CF EDS note the definition refers to outdated regulations and seek the definition refers to the NES-CF CFG seek amendments to align with the definition in the NES-CF	EDS [S222.004] (supported by Forest & Bird [FS23.160], MPHRCI [FS27.896], opposed by NZCF [FS50.043], NZFFA [FS9.185])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		CFG [S288.026] (opposed by Forest & Bird [FS23.050])
	Consistency with approach to definitions Woodridge expresses concern with the approach to the definition and suggests consistency with the way the definitions from other documents are referenced, and requests either they are referenced which requires people to look them up or the full definitions are included	Woodridge [S255.013]
Registered forestry adviser	General support Yvonne Weeber supports the definition with no reasoning provided and no relief sought	Yvonne Weeber [S183.038] (supported by MPHRCI [FS27.038])
	Amendments to definition CFG note registered members of the NZ Institute of Forestry are automatically also registered forestry advisors and seek addition of a new sub-clause (d) which includes Registered Member of the New Zealand Institute of Forestry GWRC notes the legislation reference needs updating and seeks the following amendments: “... <i>Forests (Regulation of Log Traders and Forestry Advisers) Amendment Act 1949 2020 that who is authorised to give advice that relates to:...</i> ” NZCF considers the definition narrows advice that may be given by a person registered under the Forests (Registration of Log Traders and Forest Advisers) Amendment Act 2020 and no rationale for narrowing these matters in the proposed definition is given in the Section 32 Report. To the extent that a definition is necessary, NZCF considers the definition should include all matters in Section 63M and seeks that definition is amended to: <i>"Means a person registered under s63Q or s63T of Forests (Regulation of Log Traders and Forestry Advisers) Amendment Act 2020 that is authorised to provide a forestry advice service defined by s63M of the Forests (Regulation of Log Traders and Forestry Advisers) Amendment Act 2020. give advice that relates to:</i> <i>(a) the establishment, management, or protection of a forest, and</i> <i>(b) the management or protection of land used, or intended to be used, for any purpose in connection with a forest or proposed forest, including biophysical and land use topics described in Ministry for Primary Industries, 2023, Guidance: What is a forestry adviser?, and</i> <i>(c) the beneficial effects of forests, including how they contribute to environmental outcomes."</i>	CFG [S288.027] (supported by NZCF [FS50.019], opposed by Forest & Bird [FS23.051]) GWRC [S238.007] (supported by Forest & Bird [FS23.310]) NZCF [S263.017] (opposed by Forest & Bird [FS23.388])
Replanting	General support PF Olsen supports consistency with the NES-CF and seek to retain the definition as notified Yvonne Weeber supports the definition with no reasoning provided and no relief sought NZCF seeks to retain the definition noting the proposed definition refers to the NES-PF 2017 and does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes	PF Olsen [S18.008] Yvonne Weeber [S183.039] (supported by MPHRCI [FS27.039]) NZCF [S263.018] (opposed by Forest & Bird [FS23.389])
	Alignment with NES-CF EDS note the definition refers to outdated regulations and seek the definition refers to the NES-CF CFG seek amendments to align with the definition in the NES-CF	EDS [S222.006] (opposed by NZCF [FS50.044], opposed by NZFFA [FS9.187], supported by Forest & Bird [FS23.162], MPHRCI [FS27.898]) CFG [S288.029] (opposed by Forest & Bird [FS23.053])
	Full definition Forest & Bird seeks full text of the definition is referenced to assist plan users.	Forest & Bird [S261.021] (opposed by NZFFA [FS9.348], supported by MPHRCI [FS27.640])
Vegetation clearance (for the	General support PF Olsen supports consistency with the NES-CF and seek to retain the definition as notified	PF Olsen [S18.010] Yvonne Weeber [S183.051] (supported by MPHRCI [FS27.051])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
purposes of Rules WH.R20, WH.R21 and P.R19 and P.R20)	Yvonne Weeber supports the definition with no reasoning given and no relief sought NZCF seeks to retain the definition noting the proposed definition refers to the NES-PF 2017 and does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes	NZCF [S263.019] (opposed by Forest & Bird [FS23.390])
	Opposition WFF seeks the NRP definition is retained	WFF [S193.028] (opposed by Forest & Bird [FS23.984])
	Alignment with NES-CF EDS note the definition refers to outdated regulations and seek the definition refers to the NES-CF CFG seek amendments to align with the definition in the NES-CF	EDS [S222.007] (supported by Forest & Bird [FS23.163], MPHRCI [FS27.899], opposed by NZCF [FS50.045], NZFFA [FS9.188]) CFG [S288.031] (opposed by Forest & Bird [FS23.055])
	Full definition Forest & Bird seeks full text of definition is referenced to assist plan users and	Forest & Bird [S261.025] (supported by MPHRCI [FS27.644], opposed by NZFFA [FS9.352])
New definitions	Erosion and sediment control plan for general earthworks Woodridge seeks a definition for ‘erosion and sediment control plan’ for general earthworks	Woodridge [S255.010] (supported by Kāinga Ora [FS45.096])
	Commercial forestry GWRC seeks to insert a definition for ‘commercial forestry’ as follows: <u>has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017</u>	GWRC [S238.003] (supported by Forest & Bird [FS23.306])
	Woody vegetation Hannah Bridget Gray (No2) Trust expresses concern about the lack of a definition for ‘woody vegetation’ given it is a target state and concerns about landowners being able to achieve this state	Hannah Bridget Gray (No2) Trust [S105.001]
	FMU NZFFA seeks a definition for ‘FMU’ noting this is included in parts of the plan but is not defined	NZFFA [S195.024] (opposed by Forest & Bird [FS23.427])
General comments	Woodridge seeks consistency in the way all definitions are referenced. Either they are referenced which requires people to look them up or they are referenced and the definition included	Woodridge [S255.016]

Issue 14: Maps 91 and 94 (highest erosion risk (woody vegetation) and Maps 92 and 95 (highest erosion risk (plantation forestry))

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
General		
General	<p>NZFFA notes that in the 2023 report by Easton Nation and Blyth, forestry erosion risk is based on potential erosion risk on land currently in forestry should that land be converted to pasture. NZFFA consider the measure of erosion risk used is questionable as replanting forestry has a lower erosion risk than converting land to pasture, and that mapping resulting from the report by Easton Nation and Blyth is not useful for managing a forest, as it uses 5m by 5 m pixels when forests are managed to the nearest 0.5 ha. NZFFA suggests the mapping would have required at least a contiguous size of 0.5 ha for each class of risk to be credible.</p> <p>Ara Poutama questions the appropriateness of the mapping used to identify where resource consent is required for vegetation clearance, plantation forestry, or earthworks on erosion-prone pasture. Notes the mapping for these features includes numerous small and incohesive areas and submitter questions the efficiency or effectiveness of regulating numerous small (which in many cases measure no greater than 5m by 5m) incohesive areas to manage land stability. Ara Poutama considers the maps should be amended to only identify cohesive areas being subject to the rules.</p>	<p>NZFFA [S195.025] (supported by NZCF [FS50.095], opposed by Forest & Bird [FS23.428])</p> <p>Ara Poutama [S248.004] (supported by NZCF [FS50.005])</p>
Vegetation clearance		
Map 91 (TAoP)	<p>General support</p> <p>Yvonne Weeber supports Map 91 with no reasons or relief sought provided.</p> <p>Forest & Bird support the map and seek the map is retained noting maps assist with plan interpretation.</p>	<p>Yvonne Weeber (S183) [S183.417] (supported by MPHRCI [FS27.417])</p> <p>Forest & Bird (S261) [S261.268] (supported by MPHRCI [FS27.887], opposed by NZFFA [FS9.595])</p>
	<p>Opposition</p> <p>Transpower notes mapping of “Highest erosion risk land (Woody vegetation)” includes small areas of identified land that are incohesive and questions value of regulating small, incohesive areas of woody vegetation, given controlled activity threshold for vegetation clearance is 200m². Transpower considers maps should be amended to only identify cohesive areas of woody vegetation and that isolated areas smaller than 200m² should be removed from the maps to be consistent with rules. Transpower seek amendments to Map 91, and the associated GIS map layer, to only identify cohesive areas of “Highest erosion risk land (Woody vegetation)”.</p> <p>PF Olsen considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research and seeks deletion of the mapping layer or have it peer reviewed to establish its scientific validity.</p> <p>WFF considers the methodology is not fit for purpose and requests deletion of Map 91</p> <p>Pikarere Farm considers their farm, although identified on the "Highest Erosion Risk Land" shown on Maps 91 and 94, does not include any significant erosion risk</p> <p>Woodridge considers the maps are basic and do not allow users to see where boundaries are relative to property boundaries and suggests GWRC provide TA district plan style online maps</p> <p>Kāinga Ora generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level. Kāinga Ora considers that a definition for ‘High and Highest Erosion Risk Land’ is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps and seeks deletion of the maps and a definition for ‘High and Highest Erosion Risk Land’ to more accurately capture such sites which are then subject to the associated rules, alongside any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.</p>	<p>Transpower [S177.084] (opposed by Forest & Bird [FS23.827])</p> <p>PF Olsen (S18) [S18.074]</p> <p>WFF [S193.196] (opposed by Forest & Bird [FS23.1152])</p> <p>Pikarere Farm Limited [S199.004]</p> <p>Woodridge [S255.117]</p> <p>Kāinga Ora [S257.073] (supported by NZTA [FS28.105], opposed by Transpower [FS20.075])</p>
Map 94 (TWT)	<p>General support</p> <p>Yvonne Weeber supports Map 91 with no reasons or relief sought provided</p> <p>Forest & Bird support the map and considers maps assist with plan interpretation.</p>	<p>Yvonne Weeber [S183.420] (supported by MPHRCI [FS27.420])</p> <p>Forest & Bird [S261.271] (supported by MPHRCI [FS27.890], opposed by</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
		Meridian [FS47.457], opposed by NZFFA [FS9.598])
	<p>General opposition</p> <p>Transpower notes mapping of “Highest erosion risk land (Woody vegetation)” includes small areas of identified land that are incohesive and questions value of regulating small, incohesive areas of woody vegetation, given controlled activity threshold for vegetation clearance is 200m². Transpower considers maps should be amended to only identify cohesive areas of woody vegetation and that isolated areas smaller than 200m² should be removed from the maps to be consistent with rules. Transpower seek amendments to Map 91, and the associated GIS map layer, to only identify cohesive areas of “Highest erosion risk land (Woody vegetation)”.</p> <p>PF Olsen considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research and seeks deletion of the mapping layer or have it peer reviewed to establish its scientific validity.</p> <p>WFF considers the methodology is not fit for purpose and requests deletion of Map 94</p> <p>Pikarere Farm considers their farm, although identified on the "Highest Erosion Risk Land" shown on Maps 91 and 94, does not include any significant erosion risk</p> <p>Winstone Aggregates are concerned with the accuracy of the mapping proposed for highest erosion risk land, particularly highest erosion risk land (woody vegetation), which currently includes land within Belmont Quarry. Winstone Aggregates seeks accurate and evidence-based mapping or the mapping be removed entirely or delete definitions and retain existing definition of “erosion prone land”.</p> <p>UHCC oppose Map 94 with no reasons or relief sought provided</p> <p>Woodridge considers the maps are basic and do not allow users to see where boundaries are relative to property boundaries and suggests GWRC provide TA district plan style online maps</p> <p>Ara Poutama notes parts of the Rimutaka Prison site are located near land that is mapped as Highest erosion risk land (Woody vegetation), Map 94, and includes many small areas of identified land that are incohesive (the size of each individual square identified in the maps is 5m by 5m). Submitter questions the value of regulating small, incohesive areas of woody vegetation and suggests to ensure the maps are efficient to administer and effective at achieving their intended outcome, the maps should be amended to only identify cohesive areas of woody vegetation</p> <p>Kainga Ora generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level. Kainga Ora seek deletion of the maps and consider a definition for ‘High and Highest Erosion Risk Land’ is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.</p> <p>Cannon Point are concerned about the pixelated display of the highest erosion risk areas and the associated physical boundaries identified in Map 94. Cannon Point understands the display is to be corrected, based on discussions with GWRC, and supports this change only on the proviso that the maps accurately located the highest erosion risk on site. Until these are displayed accurately depicting the site these maps are opposed. Cannon Point seeks amendments to Map 94 to better identify the actual physical boundaries of land that is at highest risk of erosion (woody vegetation clearance), to enable related PC1 provisions be interpreted correctly.</p>	<p>Transpower [S177.085] (opposed by Forest & Bird [FS23.828])</p> <p>PF Olsen [S18.076] (supported in part by Meridian [FS47.454])</p> <p>WFF [S193.199] (supported in part by Meridian [FS47.455], opposed by Forest & Bird [FS23.1155])</p> <p>Pikarere Farm [S199.005]</p> <p>Winstone Aggregates [S206.094]</p> <p>Winstone Aggregates [S206.094]</p> <p>UHCC [S225.128] (supported by Gillies [FS11.028], opposed by Forest & Bird [FS23.956])</p> <p>Woodridge [S255.120]</p> <p>Ara Poutama [S248.085]</p> <p>Kāinga Ora [S257.076] (supported by NZTA [FS28.108], supported in part by Meridian [FS47.456], opposed by Transpower [FS20.076])</p> <p>Cannon Point [S260.019] (opposed by Forest & Bird [FS23.022])</p>
Plantation forestry		
Map 92 (TaOP)	<p>General support</p> <p>Yvonne Weeber supports Map 92 with no reasons or relief sought provided</p> <p>Forest & Bird consider maps assist with plan interpretation and seek they are retained</p>	<p>Yvonne Weeber [S183.418] (supported by MPHRCI [FS27.418])</p> <p>Forest & Bird [S261.269] (supported by MPHRCI [FS27.888], opposed by NZFFA [FS9.596])</p>

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>General opposition</p> <p>WFF considers the methodology is not fit for purpose and requests deletion of Map 92</p> <p>Woodridge considers the maps are basic and do not allow users to see where boundaries are relative to property boundaries and suggests GWRC provide TA district plan style online maps</p> <p>NZCF opposes the mapping of highest erosion risk land (Plantation forestry) because the rationale for, and appropriateness of, the approach to the identification of highest erosion risk land (plantation forestry) is not clearly set out, the rationale for departing from the erosion susceptibility classification in NESPF is not set out in the manner required by section 32(4) and the practical implications of mapping and associated provisions have not been considered, including extent to which the mapped areas result in greater constraints because matters such as scale, ownership and topography may result in larger areas no longer being viable for forestry uses. NZCF seek deletion of Map 92 and to replace it with the erosion susceptibility classification in the NESPF throughout PC1.</p> <p>In a neutral submission Kāinga Ora generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level and seek deletion of the maps and a definition for ‘High and Highest Erosion Risk Land’ to capture those areas of land subject to the corresponding rules rather than high level maps.</p> <p>Ara Poutama note parts of the Arohata Prison site are located near land that is mapped as “Highest erosion risk land (Plantation forestry)” in Map 91 and the mapping of “Highest erosion risk land (Plantation forestry)” includes many small areas of identified land that are incohesive, questioning the value of regulating small, incohesive areas of plantation forestry. Ara Poutama suggests the maps should be amended to only identify cohesive areas of plantation forestry, and remove incohesive or isolated areas.</p>	<p>WFF [S193.197] (supported by NZCF [FS50.159], opposed by Forest & Bird [FS23.1153])</p> <p>Woodridge [S255.118] (supported by NZCF [FS50.182])</p> <p>NZCF [S263.031] (opposed by Forest & Bird [FS23.402])</p> <p>Kāinga Ora [S257.074] (supported by NZCF [FS50.087] and NZTA [FS28.106])</p> <p>Ara Poutama [S248.083]</p>
Map 95 (TWT)	<p>General support</p> <p>Yvonne Weeber supports Map 95 with no reasons or relief sought provided</p> <p>Forest & Bird consider maps assist with plan interpretation and seek they are retained</p>	<p>Yvonne Weeber [S183.421] (supported by MPHRCI [FS27.421])</p> <p>Forest & Bird [S261.272] (supported by MPHRCI [FS27.891], opposed by NZFFA [FS9.599])</p>
	<p>General opposition</p> <p>PF Olsen oppose the map and consider there is more research available to determine landslide susceptibility and seek the mapping be deleted or it be peer reviewed to establish its scientific validity</p> <p>WFF considers the methodology is not fit for purpose and requests deletion of map 95</p> <p>Ara Poutama notes parts of the Rimutaka Prison site are located near land that is mapped as Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation forestry) in Maps 93, 94, and 95. Ara Poutama notes the mapping of Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation forestry) includes many small areas of identified land that are incohesive (the size of each individual square identified in the maps is 5m by 5m). Submitter questions the value of regulating small, incohesive areas of woody vegetation, pasture, and plantation forestry and suggests maps 93, 94, 95 and the associated GIS layer should be amended to only identify cohesive areas of woody vegetation, pasture, and plantation forestry, and remove incohesive or isolated areas.</p> <p>Woodridge considers the maps are basic and do not allow users to see where boundaries are relative to property boundaries and suggests GWRC provide TA district plan style online maps</p> <p>In a neutral submission Kāinga Ora generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level and seek a definition for ‘High and Highest Erosion Risk Land’ to capture those areas of land subject to the corresponding rules rather than high level maps.</p> <p>NZCF opposes the mapping of highest erosion risk land (Plantation forestry) because the rationale for, and appropriateness of, the approach to the identification of highest erosion risk land (plantation forestry) is not clearly set out, the rationale for departing from the erosion susceptibility classification in NESPF is not set out in the manner required by section 32(4) and the practical implications of mapping and associated provisions have not been considered, including extent to which the mapped areas result in greater constraints because matters such as scale, ownership and topography may result in larger areas no longer being viable for forestry uses. NZCF seek deletion of Map 95 and to replace it with the erosion susceptibility classification in the NESPF throughout PC1.</p>	<p>PF Olsen [S18.077] (supported by NZCF [FS50.134])</p> <p>WFF [S193.200] (supported by NZCF [FS50.160], opposed by Forest & Bird [FS23.1156])</p> <p>Ara Poutama [S248.086]</p> <p>Woodridge [S255.121] (supported by NZCF [FS50.183])</p> <p>Kāinga Ora [S257.077] (supported by NZCF [FS50.088] and NZTA [FS28.109])</p> <p>NZCF [S263.032] (opposed by Forest & Bird [FS23.403])</p>

Issue 15: Not applicable to whitua

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Rule R104	<p>Yvonne Weeber is neutral on Rule R104 not applying to the whitua, with no reasons stated or decision sought.</p> <p>WFF opposes the exclusion of Rule R104 from applying to the whitua and seeks for it to remain operative for all whitua. Forest Enterprises also opposes Rule R104, but with no reasons stated or decision sought.</p> <p>William Studd seeks for Rule R104 to be amended but does not specify the exact amendments sought. William Studd notes their support for NZFFA's submission and considers scientific evidence and detailed expert consideration is required before amending the current NES-CF regime.</p>	<p>Yvonne Weeber [S183.150] (supported by MPHRCI [FS27.150])</p> <p>Forest Enterprises [S111.022]</p> <p>WFF [S193.042] (supported by Meridian [FS47.149], opposed by Forest & Bird [FS23.998])</p> <p>William Studd [S21.001]</p>
Rule R105	<p>Yvonne Weeber is neutral on Rule R105, with no reasons stated or decision sought.</p> <p>WFF opposes the exclusion of Rule R105 from applying to the whitua and seeks for it to remain operative for all whitua.</p>	<p>Yvonne Weeber [S183.151] (supported by MPHRCI [FS27.151])</p> <p>WFF [S193.043] (supported by Meridian [FS47.150], opposed by Forest & Bird [FS23.999])</p>
Rule R106	Yvonne Weeber is neutral on Rule R106 not applying to the whitua, with no reasons stated or decision sought.	Yvonne Weeber [S183.152] (supported by MPHRCI [FS27.152])
Rule R107	<p>Yvonne Weeber is neutral on Rule R107 not applying to the whitua, with no reasons stated or decision sought.</p> <p>WFF opposes the exclusion of Rule R107 from applying to the whitua and seeks for it to remain operative for all whitua. Forest Enterprises also opposes Rule R107, but with no reasons stated or decision sought.</p>	<p>Forest Enterprises [S111.023]</p> <p>Yvonne Weeber [S183.153] (supported by MPHRCI [FS27.153])</p> <p>WFF [S193.044] (supported by Meridian [FS47.153], opposed by Forest & Bird [FS23.1000])</p>

Issue 16: Forestry provisions general opposition

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Submissions supporting others	<p>There are a number of pro-forma submissions in support of other submissions, generally supporting representatives of the forestry sector. This includes:</p> <ul style="list-style-type: none"> Pro-forma submissions⁷ supporting the NZFFA and NZFFA Wellington submissions Allan Bell & Associates supports the NZFFA Wellington submission Forest Enterprises supports submissions of CFG, JTL, NZFFA and Juken NZ Juken NZ supports the submissions of CFG, JTL and Forest Enterprises JTL supports the submissions of CFG, Forest Enterprises and Juken NZ NZFFA Wellington supports the submission of NZFFA NZFFA supports the submissions from NZFFA Wellington, NZCF, Forest Enterprises, CFG, JTL and Juken NZ where they are not in conflict with its own submission 	<p>Alan Bell & Associates [S48.001]</p> <p>Forest Enterprises [S111.001]</p> <p>Juken NZ [S191.002]</p> <p>JTL [S237.001]</p> <p>NZFFA Wellington [S36.001]</p> <p>NZFFA [S195.027] (opposed by Forest & Bird [FS23.430])</p>
Replace NESPF with NESCF	<p>GWRC notes the NES-PF has been replaced by the NES-CF and seeks to amend PC1 provisions to replace NES-PF with NES-CF.</p> <p>Dougal Morrison considers any reference to the NES-PF should be replaced with the NES-CF</p>	<p>GWRC [S238.001] (supported by Forest & Bird [FS23.304])</p> <p>Dougal Morrison [S3.002] (opposed by NZCF [FS50.032])</p>
Scope of PC1	<p>NZFFA considers the council's decision to make a submission to fix the missing controls on replanting included in the Section 32 report would be a significant departure from the publicly available intentions and is concerned that others may have made submissions had they known things were subject to change. NZFFA seeks replanting not be regulated in the proposed plan. NZFFA considers PC1 references and contains outdated definitions and regulations from the NES-PF despite this being superseded by the NES-CF regulations and due to this the submitter considers it impossible to discern the actual meaning of the proposed new Plan.</p> <p>NZCF notes 'Production forestry' is defined in the NRP with reference to the NES-PF, meaning permanent forests, such as commercial forests for carbon sequestration purposes, are not managed by provisions of PC1. NZCF considers that whilst submission and decision-making processes can address alignment of PC1 provisions with the NESCF, submissions and decision-making cannot be used to expand scope of PC1 to also address 'carbon forests' and considers management of discharges from 'carbon forests', or 'carbon forests' more generally, is outside the scope of PC1. NZCF is also concerned about the relationship of the NES-CF and PC1 and considers PC1 provisions cannot prevail over the NES-CF because the note about specific rules prevailing refers to the NES-PF and reference to the NES-CF was not included in PC1 as notified. Submitter questions whether this confusion can be remedied by simply replacing the acronym 'NESPF' with 'NESCF' without scope of PC1 being called into question</p> <p>CFG is concerned submissions are used to rectify oversights not included in PC1. CFG notes replanting on high risk land is not included as a non-complying use, but is intended to be rectified by way of submissions by GWRC and considers it inappropriate to insert rules that have not been included in public documentation.</p> <p>Juken NZ notes that replanting is included in the Section 32 report but was an omission in the draft plan as an oversight by GWRC and considers this should have been rectified by updating the draft plan rather than waiting on submissions as submitters maybe unaware of the replanting omission.</p>	<p>NZFFA [S195.005] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.077], opposed by Forest & Bird [FS23.408]) and [S195.007] (opposed by Forest & Bird [FS23.410])</p> <p>NZCF [S263.003] (opposed by Forest & Bird [FS23.374]); [S263.005] (opposed by Forest & Bird [FS23.376]) and [S263.005] (opposed by Forest & Bird [FS23.376])</p> <p>CFG [S288.002] (opposed by Forest & Bird [FS23.026])</p> <p>Juken NZ [S191.004] (supported by NZCF [FS50.086])</p>
General/overarching comments about PC1	<p>NZFFA considers PC1 is biased against forestry. Notes Council monitoring demonstrates that water quality for catchments with significant forest cover is generally better water quality compared with other land uses. Concerned PC1 will cause a significant decline in commercial forest activity in the Wellington region which, in turn, will impact the regional economy, make it harder to meet climate change targets, and may lead to negative environmental effects.</p> <p>Robert Pavis-Hall, Gaynor Rowswell, Katie Norman, Megan Norman note the largest area of Highest Risk Plantation is Regional Park and questions whether GWRC will fence off all the areas prone to erosion in the regional park and wonders how GWRC propose to pay for it. The submitter recommends PC1 is withdrawn</p>	<p>NZFFA [S195.001] (supported by NZCF [FS50.090], opposed by Forest & Bird [FS23.404]) and [S195.007] (opposed by Forest & Bird [FS23.410])</p>

⁷ Julian Bateson [S100.001]; Chris and Gwen Bossley [S104.001]; David Bennett & Jenni Lean [S184.001]; Wayne Bettjeman [S198.001]; Robin Chesterfield [S25.001]; Dougal Morrison [S3.019]; Richard Swan [S47.001]; Hamish Levak [S49.001]; Jeremy Collyns [S52.001]; Peter Kiernan [S54.001]; Annette Cairns [S55.001]; David and Carolyn Gratton [S58.001]

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>Peter Handford across multiple submission points⁸ is concerned PC1 creates a blanket exclusion for “highest erosion risk” areas without recognising the range of forest management options and this removes potential for forest management to provide ecosystem services including biodiversity, carbon sequestration, soil and water protection and recreation. Submitter considers innovative and environmentally sensitive forest management approaches should be facilitated and encouraged as low impact forestry management is possible without negative impacts</p> <p>CFG considers several aspects of PC1 are poorly founded and require further research and explanation. CFG note the following points of concern:</p> <ul style="list-style-type: none"> • Consultation/representation process has been flawed directly impacting sectors • Controls extend beyond the recommendations of whitua committee reports • Rules that apply to forestry are not supported by GWRC data or past records • Rules are unable to be implemented without loss of estate due to spatial logistics of harvesting and roading • No consideration of the ETS and other cost liabilities related to non-replanting land retired under PC1 rules • S32 analysis is inadequate and the duties under Regulation 6 of the NESCF have not been sufficiently executed 	<p>Robert Pavis-Hall, Gaynor Rowswell, Katie Norman, Megan Norman [S273.007]</p> <p>CFG [S288.001] (supported by NZCF [FS50.012], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.107], opposed by Forest & Bird [FS23.025])</p>
Engagement	<p>CFG expresses concerns about the consultation/representation process and its impact on sectors. CFG notes there was only one identifiable party with forestry expertise in TAoP until 2018, and no such expertise within TWT and is concerned further engagement with affected sectors was not undertaken between completion of action plans and publishing of PC1, noting a divergence between PC1 rules to achieve freshwater objectives and the whitua committees’ recommendations. CFG considers the notification process was too short to evaluate and make submissions and that it is bad faith to notify significant changes from the NRP with limited time to make submissions and forestry, and sectors that may potentially be significantly adversely affected, have been under-represented in development of the PC1 outcomes. CFG has no concerns with the recommendations of the whitua committees, noting the expectations of those recommendations that the sector and GWRC would work within the existing framework to achieve water quality objectives.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate consider PC1 is an over-reaction and does not take into account the costs and benefits of this change in land use and property rights of land owners who undertake a forestry business on the land. There appears to have been no consultation with the Region’s forestry industry in development of these provisions despite the significant impact it will have on the industry, the submitter’s own operator was not consulted as well as many of its contracting crews.</p> <p>NZFFA Wellington is concerned PC1 lacks input from experienced soil conservators and questions why they were not consulted, with the potential for a tunnel-view solution being proposed for a problem that may not exist</p>	<p>CFG [S288.001] (supported by NZCF [FS50.012], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.107], opposed by Forest & Bird [FS23.025]) and [S288.002] (opposed by Forest & Bird [FS23.026])</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.003] (supported by NZCF [FS50.069])</p> <p>NZFFA Wellington [S36.012] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.003], supported by NZCF [FS50.164])</p>
Mapping and classification of erosion risk land	<p>Forest Enterprises are concerned GWRC have ignored statements made by Easton, Nation and Blyth and the technical memorandum for the mapping is flawed and oversimplified and therefore the analysis and recommendations are unjustified. Forest Enterprises suggests a site-specific assessment, which has the same purpose as the required Harvest and Earthworks plans (schedule 4 & 6) of NESCF, provides more appropriate mitigation measures than the generalised PC1 and a site-specific field assessment and expert advice should prevail</p> <p>Juken NZ notes concerns about the impracticalities of the erosion mapping and definition of high erosion land and considers the definition of erosion risk on forestry land is flawed, as it does not resemble that erosion risk is significantly lower on land with tree cover than pasture land and suggests that the pixelated quality of maps 92 and 95 will result in more land than necessary being written off</p> <p>NZFFA considers the analysis in the s32 report confuses relative erosion risk with absolute erosion risk and is concerned there is different terminology used in PC1. NZFFA considers just because land is in the top 10% does not imply that it is at risk of erosion. NZFFA notes if Greater Wellington is concerned that the land in its area has been misclassified in the NES-CF, then there are channels to update the mapping and classifications. NZFFA Considers the S32 report focuses on relative risk, not absolute risk and is concerned there would always be a ‘top 10%’ of erosion risk land under plantation forestry and that land’s retirement with each successive harvest would lead over time to very little plantation forestry remaining.</p>	<p>Forest Enterprises [S111.005] (supported by NZCF [FS50.059])</p> <p>Juken NZ [S191.001] (supported by NZCF [FS50.084]) and [S191.004] (supported by NZCF [FS50.086])</p> <p>NZFFA [S195.013] (opposed by Forest & Bird [FS23.416]) and NZFFA [S195.014] (opposed by Forest & Bird [FS23.417]) and [S195.017] (opposed by Forest & Bird [FS23.420])</p>

⁸ Peter Handford [S280.002] (supported by NZCF [FS50.115]); [S280.003] (supported by NZCF [FS50.116]); [S280.004] (supported by NZCF [FS50.117])

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	<p>Southern North Island Wood Council considers there are impracticalities of the current erosion mapping class system suggesting the resolution is too low and does not reflect forest scale erosion risk.</p> <p>CFG is concerned with the approach taken to define areas of “high erosion risk” and the application of those findings suggesting it is impractical and will result in write-off of much larger areas than estimated by GWRC. CFG expresses concern about methods and layers that do not include geological considerations, lack of peer review and that the methods will lead to land being retired that is not at risk of slipping and land not being retired that may suffer landslides in severe weather events. CFG notes the methodology has led to ‘pixilation’, which is impractical for forestry activities as rules could enable forestry in one patch and disallow it in an adjacent patch, noting several factors which determine harvesting feasibility resulting in more land needing to be retired than suggested in GWRC data. CFG estimates that in the estate GFG manages, anything from an average of 9% up to 18% might be retired due to PC1 rules.</p>	<p>Southern North Island Wood Council (S262) [S262.004] (supported by NZCF [FS50.137])</p> <p>CFG [S288.013] (supported by NZCF [FS50.015], opposed by Forest & Bird [FS23.037]); [S288.014] (supported by NZCF [FS50.016], opposed by Forest & Bird [FS23.038])</p>
Alignment with Whaitua recommendations	<p>Forest Enterprises considers no recommendations from the Whaitua committees or the forestry industry have been implemented which reflect the proposed rules for plantation forestry and notes the Whaitua Committee reports recommended Regional Council need to work with forestry groups and contractors to provide support that includes ensuring all forestry operators are aware of relevant regulatory requirements and good practice. Forest Enterprises considers there is a lack of evidence that GWRC has engaged forestry groups and considers implementing new compliance roles does not achieve this recommendation. Forest Enterprises considers environmental outcomes the WIPs have recommended are not reflected by the proposed rules and that oversimplifying slope and not factoring forestry activities, yet proposing rules on this basis, is scientifically and logically inconsistent. Forest Enterprises notes whaitua recommendations are consistent with the NESCF and provides the site-specific assessments needed and invite GWRC to consult with forestry industry and evaluate level of stringency that the NESCF already provides.</p> <p>Juken NZ notes concerns about the extension of controls beyond the recommendations of the WIP reports</p> <p>NZFFA considers Council have rejected recommendations from TAoP and TWT WIPs for better enforcement of compliance and are undertaking a process that is complex, costly and addressing a problem has not been established with regulations that are unnecessary and it would be more cost effective to perform its role under the national standard. NZFFA notes discrepancies in the interpretation of TAoP WIP recommendations 54 and 55 within the s32 report and suggests that these recommendations do not focus on improving plantation forestry management to reduce sediment, but rather call for changes within the framework of the NES-PF, contradicting the objectives of PC1. NZFFA does not consider GWRC is working with the industry and that PC1 is not an adequate response to these recommendations. NZFFA considers that TWT WIP recommendation 37 is not focused on promoting best practices in plantation forestry and monitoring compliance, as highlighted in the s32 report but is focused on the Council's staffing level and seeks alignment with the NES-PF to enhance outcomes. NZFFA suggests TWT WIP recommendations 76-78 do not require all harvesting to be approved by the Council, or to be a controlled activity and that PC1 does not achieve the outcomes sought in the WIP recommendations</p> <p>NZCF considers PC1 does not resemble the recommendations of the TWT WIP as the WIP relies on the NES-PF and acknowledges time should be allowed for the NES-PF to be implemented, whereas PC1 seeks to override it. NZCF considers PC1 fails to acknowledge benefits for water quality from plantation forestry that have been identified in the WIP. Similarly in relation to the TAoP WIP, NZCF considers PC1 fails to respond to recommendations that emphasise engagement and monitoring and agrees the NESPF, and now the NES-CF, should be given time to ‘bed-in’ before more stringent provisions are included in the NRP. NZCF seeks PC1 be withdrawn (or the Proposed Plan Change is not included in the NRP) and redrafted to reflect recommendations in the WIP</p> <p>CFG notes disparities between the WIP recommendations and PC1 rules. CFG and that the TAoP committee considered more stringent rules for forestry to achieve the sediment objectives, but concluded the permitted framework of NES-PF should be given time to be implemented and that understanding and mapping erosion prone land at the local whaitua scale was important to inform future planning. CFG points out that no recommendations were made by the TAoP committee requiring that plantation forests should be retired or stringency beyond the (then) NES-PF was required and neither whaitua committee recommended an explicit need to retire areas of production forestry. CFG suggests the committees urged a focus on education, implementation, monitoring and enforcement where necessary and the recommendations sought close liaison between the sector and GWRC land management staff when looking at land use management planning around high-risk erosion sites. CFG notes neither whaitua committee made recommendations to address an explicit link between forestry and water quality attribute standards or objectives.</p> <p>CFG notes neither whaitua committee recommended the introduction of stringent new rules, and instead advocated that the NES-PF is given time to adjust and bed in backed up by, education, monitoring and where and if necessary, enforcement. CFG notes existing operations with constructive interactions between monitoring staff and forest management, including testing alternatives to achieve the best results possible and that most forestry companies review their plantable boundaries after harvest and as a result, most second rotation estates see increased non-productive reserve, retirements, and riparian areas, and in many cases riparian buffers are much larger than the minimum. CFG considers past retirements and riparian exclusions from previous operations reflect the</p>	<p>Forest Enterprises [S111.008] (supported by NZCF [FS50.061]) and [S111.009] (supported by NZCF [FS50.062])</p> <p>Juken NZ [S191.001] (supported by NZCF [FS50.084])</p> <p>NZFFA [S195.007] (opposed by Forest & Bird [FS23.410]) and [S195.016] (opposed by Forest & Bird [FS23.419])</p> <p>NZCF [S263.007] (opposed by Forest & Bird [FS23.378]) and [S263.008] (opposed by Forest & Bird [FS23.379])</p> <p>CFG [S288.001] (supported by NZCF [FS50.012], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.107], opposed by Forest & Bird [FS23.025]) and S288.003] (supported by NZCF [FS50.013], opposed by Forest & Bird [FS23.027])</p> <p>Dougal Morrison [S3.007] and [S3.013] (supported in part by NZCF [FS50.039])</p>

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	<p>sentiment of the whitua committees in respect of promoting good land use and land use decision making, education, and working with Council land managers to achieve good outcomes. CFG is concerned that this existing work has not been recognised."</p> <p>Dougal Morrison considers extra resources should be provided to a monitoring team as per whitua recommendations and references recommendations from the WIPs that have not been followed.</p>	
Robustness of evidence	<p>Forest Enterprises across multiple submission points⁹ make the following comments:</p> <ul style="list-style-type: none"> Rules WH.R17 to WH.R22 and Rules P.R16 to P.R21 neglect to acknowledge the precedence of the NES-PF and NES-CF, which recognises a need for flexibility to protect sensitive local environments and notes Regional and District Councils can be more stringent or more lenient but that needs to be based on assessments of science and encompasses all environmental, social, and economic factors including those already in place. Notes the requirement to demonstrate a more stringent rule is justified in the context of the region/district in accordance with section 32(4) of the RMA and suggests proving a link between a proposed rule and a plan objective that gives effect to the NPS-FM is not sufficient. Notes NES-CF has rules and controls for total suspended solids and plantation forestry discharges and seeks justification on how rules in PC1 provide greater positive environmental outcomes. Considers NES-CF has rules and controls for the winter earthworks shutdown period and already manages effects. Considers a requirement for greater stringency has not been demonstrated. <p>Juken NZ¹⁰ across multiple submission points expresses concern about inadequate s32 analysis and deficient application of NES-CF Regulation 6 for enforcing more stringent rules. Juken NZ notes they are unaware of any evidence that the NES-PF is not meeting the intended outcomes for the Wellington Region and sees no reason why the NES-CF would not continue to do so. Juken NZ notes there is a process to be undertaken by the council to justify any application of stringency under Regulation 6 of the NES-CF, and refers to Section 32 (4) of the RMA. Juken NZ considers proving a link between a proposed rule and a plan objective that gives effect to the NPS-FM is not sufficient to meet Regulation 6(1)(a) and the s32 report does not provide any evidence that the enforcing of more stringent rules will deliver better outcomes than the NES-CF. Juken NZ also notes that neither of the two Whitua committees recommended that the NESPF was insufficient to meet fresh water targets. Juken NZ considers there is no logic that defining and removing the top 10% of highest erodible forestry land from production would lead to better outcomes for fresh water.</p> <p>NZFFA across multiple submissions¹¹ makes the following comments</p> <ul style="list-style-type: none"> Council has not provided evidence to support claims within the s32 report forestry is responsible for the “current degraded state” of water bodies and there is no evidence that the NES-PF failed to achieve the water quality standards of Greater Wellington, nor any evidence that the new, more stringent NES-CF will fail. NZFFA notes if PC1 is adopted it would be impossible to determine whether or not the new regulations for forestry resulted in any discernible improvements in water quality and considers without such evidence, there is no reason to undercut a national environmental standard. NZFFA also notes the s32 report does not mention that GWRC could be liable for compensation to CFG under PC1. Considers assumptions in the s32 report that the NES-CF is focussed on including carbon forestry as the basis for PC1 is unjustified, and considers the NES-CF offers stronger environmental protection through requirements such as Afforestation Plans and Harvest Management Plans. Considers GWRC have not provided forestry specific evidence related to the Wellington region that demonstrates the NES-PF (and now the NES-CF) does not give effect to a specific objective developed to give effect to the NES-FW and there is no justification for the proposed new forestry rules. By contrast, there is plenty of evidence that plantation forestry as a land use leads to reduced sediment loads and improved water quality. NZFFA suggests that what is proposed does not comply with regulation 6.1 in the NES-CF. Notes the s32 report considers the notification process for forestry activities in the NES-PF is not fit for purpose but there is no evidence that the plans provided under the NES-PF and now under the NES-CF are inadequate. NZFFA notes Whitua recommendations asking the Council to better enforce compliance within the NES-PF rather than seek more stringent regulations and acknowledges there have been breaches, but that this will happen with any regulation irrespective of its stringency. NZFFA notes Regional Council staff will not enforce plans unless there is a complaint and suggests they are 	See footnotes

⁹ Forest Enterprises [S111.003] (supported by NZCF [FS50.058], supported by Pukerua Holdings [FS30.057]); [S111.006] (supported by NZCF [FS50.060], supported by Pukerua Holdings [FS30.059]); [S111.007]

¹⁰ Juken NZ [S191.001] (supported by NZCF [FS50.084]) and [S191.003] (supported by NZCF [FS50.085]) and [S191.004] (supported by NZCF [FS50.086])

¹¹ NZFFA [S195.008] (supported by NZCF [FS50.091], opposed by Forest & Bird [FS23.411]); [S195.010] (supported by NZCF [FS50.092], opposed by Forest & Bird [FS23.413]); [S195.011] (opposed by Forest & Bird [FS23.414]); [S195.012] (opposed by Forest & Bird [FS23.415]); [S195.015] (opposed by Forest & Bird [FS23.418]); NZFFA [S195.018] (supported by NZCF [FS50.093], opposed by Forest & Bird [FS23.421]); [S195.020] (opposed by Forest & Bird [FS23.423]); [S195.021] (opposed by Forest & Bird [FS23.424]); [S195.022] (supported by NZCF [FS50.094], opposed by Forest & Bird [FS23.425]) and [S195.023] (opposed by Forest & Bird [FS23.426])

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	<p>slow to act. NZFFA considers Greater Wellington staff are not aware of the content of the current regulations and suggests better resourcing and training, rather than more regulations, would lead to better outcomes.</p> <ul style="list-style-type: none"> NZFFA consider the NES-PF/CF is capable of regulating forestry to control sediment when enforced and there are more effective ways of improving water quality than those proposed under PC1. NZFFA notes the costs of PC1 may outweigh the benefits because as there is no evidence quantifying how much sediment is attributable to which land use, there is a high risk of adding costs without achieving real benefits NZFFA notes studies showing that over the course of a whole rotation, commercial forestry is much better than other land uses at minimising sediment flows, such as the Pakuratahi paired-catchment study. NZFFA disagrees with the assessment that the social costs of policy package options 1 and 3 will be low. Considers both options would reduce plantation forestry activity, leading to job losses, the impacts of which are not quantified in the analysis. NZFFA considers the environmental benefits for policy packages 1, 2 and 3 in the s32 report are equal. NZFFA considers the s32 analysis does not quantify the monetary costs of the options, noting economic factors such as the devaluation of forest land, reduction of economic activity and loss of forest income. Considers the economic cost for policy package option 1 is high, and for option 3 medium, as both will increase costs and create a “negative benefit”. Overall NZFFA considers the s32 analysis is subjective, rather than evidence based. <p>JTL across multiple submission points¹² makes the following comments:</p> <ul style="list-style-type: none"> JTL is concerned about the lack of evidence and justification for forestry restrictions and how NES-CF controls are insufficient for managing forestry and associated effects. JTL supports Te Mana o te Wai but considers any rule, policy or objective of PC1 intended to give effect to Te Mana o te Wai must demonstrate it is necessary to do so JTL considers any rule, policy or objective of PC1 intended to give effect to a specified TAS must demonstrate it is necessary and suggests scientific data supports that current forest land use, controls, and management practices, as regulated under the NES-CF, are sufficient to achieve the desired target attribute state for freshwater clarity. JTL consider commercial forestry as a land use is beneficial for water quality and that planting commercial forests (afforestation and replanting) should be encouraged, and not restricted or prohibited, by the NRP. JTL question if any of the amended policies, objectives and rules relating to commercial forestry land use are necessary to achieve target attribute states in other FMU or part-FMU and opposes any proposed or amended rules in PC1 for commercial forestry, on the basis they are not necessary for achieving the target attribute state for visual clarity and total suspended sediment, and current National Standards are appropriate for managing forestry activities and their effects. JTL considers the Collaborations report suggests no scientific relationship between erosion risk, sediment delivery (connectivity), sediment yield, or receiving environment target state attributes, such as visual clarity and question how a spatial model of erosion risk can apply as a tool for managing water quality from land used for commercial forestry operations, particularly without any evidence or consideration of existing literature on connectivity and sediment yield. JTL opposes rules related to identified highest erosion risk land, land use and discharge consent thresholds, and erosion and sediment management plans, as they relate to commercial forestry activities as they are already adequately controlled by the NES-CF. JTL considers the s32 Report does not provide evidence or justify that existing commercial forestry contributes to sedimentation and current forestry management practices and the regulatory framework is not adequate to address the improvements needed. JTL considers Councils data suggests the existing regime controlled by NES-CF does not appear to contribute any additional sediment that would be necessary to address to achieve water clarity targets within catchments monitored with that land use. JTL seeks rules consistent with the NES-CF and notes the sediment discharge provisions of the NES-CF form an important component of the permitted activity standards for forestry earthworks under the current regulatory regime, and apply irrespective of the identified erosion susceptibility of the land. JTL suggests Council has overlooked the role of water quality standards (namely permitted activity discharges) already provided for by the NES-CF and questions if further deviation from standards is necessary or defensible. 	

¹² JTL [S237.002] (supported by NZCF [FS50.076]); [S237.004] (supported by NZCF [FS50.078]); [S237.007];[S237.008] (supported by NZCF [FS50.080]); [S237.009] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.015], supported by NZCF [FS50.081] and [S237.010] (supported by NZCF [FS50.082])

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	<ul style="list-style-type: none"> JTL considers PC1 is also duplicating existing requirements to have a management plan to address erosion and sedimentation from land disturbing activities and there is no evidence provided in Council reports that current NES-CF framework for managing erosion, sediment, and water quality is deficient either in current monitoring data or desired future state. JTL also notes there is no evidence provided by Council that existing Forestry Earthworks and Harvest Management Plans within NES-CF are insufficient for managing forestry activities. JTL notes PC1 must be implemented in accordance with statutory provisions and National Environmental Standards take primacy over Plan rules unless the standards expressly provide otherwise, and PC1 should complement existing NES-CF framework and only introduce more stringent rules where necessary to achieve an objective developed to give effect to NPS-FM. JTL is concerned current provisions seek to replace the current permitted activity approach of National Instruments leading to regulatory inconsistency and notes whilst regulation 6 of NES-CF allows for a council to provide more stringent rules to meet an objective giving effect to NPS-FM, there is a process to be undertaken by council to justify any application of stringency referring to Section 32 (4) of RMA. JTL considers none of the proposed changes necessary, or validly justified, Council has not undertaken any of its own research into how NES-CF provisions have been operating and has failed to provide evidence to support these proposed changes, including evidence to show current regulatory regime is not sufficient to achieve a plan objective. JTL suggests proposed or amended policies, objectives or rules of PC1 as they relate to commercial forestry are not necessary or appropriately justified in accordance with the statutory provisions of Section 32(4) of RMA. JTL consider the NES-CF is sufficient for managing forestry activities and notes Council have not provided any evidence contrary to this. JTL seeks Council provide evidence that NES-CF is insufficient to meet the objectives for water quality, ecosystem health and mana whenua values in these FMUs before looking to pursue this plan change process further, or alternatively seeks Council utilise stringency ability under NES-CF to develop more stringent rules for specific controls, noting Council must provide evidence to show the NES-CF controls are not sufficient to achieve a specific plan objective to give effect to the NPS-FM in order to apply a more stringent rule. <p>Southern North Island Wood Council across multiple submission points¹³ make the following comments:</p> <ul style="list-style-type: none"> Support the inclusion of Te Mana o Te Wai but the rules need to be supported by appropriate evidence, implemented in accordance with relevant statutory provisions and consistent with the NESCF framework. Plantation forests discharge less sediment than other land uses, citing the Pakuratahi Land Use Study and suggest monitoring shows water quality is higher in catchments with significant forest cover, compared to other land uses. The s32 report attributes current water quality issues to forestry without sufficient supporting evidence and notes that recent NES-CF changes are sufficient to protect freshwater. There is insufficient evidence to suggest that there is an issue with sediment produced from plantation forestry, the NES-CF has led to more adverse environmental outcomes compared to the pre-2018 consenting regime or that either forestry or the NES-CF are attributed to current water quality issues. Disagrees with the s32 evaluation of the social costs for Options 1 and 3 being minimal, due to job losses in plantation forestry operations, at the port, and regional sawmills and the analysis of monetary implications in the s32 report is insufficient as it is feasible to estimate costs of resource consent applications, consent processing and monitoring, devaluation of forestry land, a decline in economic activity and forfeiture of income from timber and carbon credits. Considers the economic costs for Option 1 (as evaluated in the s32 report) will be substantial, and moderate for Option 3, both resulting in an overall “negative benefit”. <p>NZCF¹⁴ makes the following comments:</p> <ul style="list-style-type: none"> NZCF accepts that some forestry related activities have adverse effects (including in respect of the discharge of sediment), but considers PC1 documentation does not provide sufficient evidence, or technical data to support proposed regulatory response. Considers that the regulatory response included in the PC1, being the avoidance of land disturbance, is disproportionate to outcome sought by PC1, being reduction of sediment in rivers. The s32 report fails to clearly identify the objective, or objectives, the provisions of PC1 are to achieve and therefore does not support a conclusion that provisions are most appropriate; The s32 report does not include any evidence to support conclusions in respect of extent to which sediment in streams is reduced by various policy options that are evaluated; 	

¹³ Southern North Island Wood Council [S262.001]; [S262.007]; [S262.009]; [S262.011] (supported by NZCF [FS50.139]); [S262.012] (supported by NZCF [FS50.140])

¹⁴ NZCF [S263.001] (opposed by Forest & Bird [FS23.372]) and [S263.010] (opposed by Forest & Bird [FS23.381])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<ul style="list-style-type: none"> • The s32 fails to consider potential for sediment losses from land uses other than forestry, that is, potential for sediment losses to be greater where land is put to alternative uses • The s32 does not address New Zealand’s Emissions Reduction Plan (as required by section 66 of the RMA), does not consider the contribution forestry makes to achieving New Zealand’s emissions reduction target and does not address New Zealand’s National Adaptation Plan (made in accordance with section 5ZI of the Climate Change Response Act 2002) as required by section 66 of the RMA and particularly does not consider ‘Action 6.12: Implement the Sustainable Land Management Hill Country Erosion Programme’ and acknowledgement that afforestation can reduce soil loss; • The s32 does not consider efficiency or costs in respect of practical implications of Maps 92 and 95, that is, the cost of areas where forestry is prohibited by virtue of the maps causing the ability to use neighbouring land for forest to be prevented or constraint through ownership, scale, access and economic constraints • The s32 fails to describe or set out the social costs of the various options that have been evaluated and does not quantify the costs of the various options, including in respect of employment and the New Zealand Emissions Trading Scheme; • Does not provide any evidence or data to support the conclusion the environment is degraded as a result of the status quo, including the NESPF, and the existing policy framework is unsuccessful at achieving outcomes set by objectives in NRP, Implementation Plans or national instruments. <p>NZCF overall considers PC1 is flawed because the evaluation required under section 32(4) of the RMA has not been completed or documented in the s32 report and the report fails to confirm the provisions are the most appropriate, efficient or effective means to achieve objectives or give effect to higher order planning instruments</p> <p>NZCF opposes PC1 and seeks:</p> <ul style="list-style-type: none"> • That the provisions of the Proposed Plan Change that regulate commercial forestry, including those provisions that are intended to prevail over the NESPF, are withdrawn (or the Proposed Plan Change is not included in the NRP) until such time as: <ul style="list-style-type: none"> ○ the efficiency and effectiveness of the NESCF has been monitored and the results of such monitoring support the need for provisions in the NRP that prevail over the NESCF; ○ the scope of the Proposed Plan Change clarified, including in respect of permanent forests, or commercial forests planted for carbon sequestration purposes; ○ decisions on submissions on Proposed Change 1 to the WRPS have been made; ○ the recommendations in the Te Whaitua te Whanganui-a-Tara Implementation Programme 2021 are accurately and appropriately reflected in PC1 provisions; ○ a fulsome evaluation of the provisions is undertaken in a manner consistent with section 32 of the RMA, with the outcome of that evaluation confirming the necessity of the Proposed Plan Change; and an evaluation is completed under section 32(4) of the RMA, that explicitly evaluates the relevant provisions of the Proposed Plan Change relative to the NESPF, with the outcome of that evaluation confirming the necessity of provisions that prevail over the NESPF. • Should the relevant provisions of the Proposed Plan Change not be withdrawn (or the Proposed Plan Change is included in the NRP), NZCF seeks that the Proposed Plan Change is amended to make all required changes, including the specific amendments set out in Appendix A of their submissions. It is noted that the relief in Appendix A is only sought should NZCF’s primary relief (being the withdrawal of the Proposed Plan Change or the Proposed Plan Change not being include in the NRP) not be accepted. • Such further, alternative or consequential relief as may be necessary to fully give effect to this submission. • NZCF is available and willing to work collaboratively with GWRC, including through the sharing of information in respect of commercial forestry and the implementation of the NESCF, to further develop practice and any necessary regulatory intervention to address the adverse effects of discharges from commercial forestry activities on water quality. <p>CFG across multiple submission points express concern about the evidence relied on for PC1, noting GWRC’s water quality data is insufficient and does not support the stringency upon forestry it seeks to apply.</p>	

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<ul style="list-style-type: none"> CFG¹⁵ sites aerial sequences and monitoring data from some pFMU's in which they operate <p>CFG¹⁶ across further submission points makes the following comments:</p> <ul style="list-style-type: none"> CFG recognises that forest harvesting and earthworks can locally and temporarily raise sediment levels during and immediately after operations but over the long-term, impacts on waterbodies are low and often trend towards baselines established for native forest areas. CFG notes forestry activities have been undertaken in preceding years in catchments displaying good water quality results and harvesting occupies relatively small proportions of the total catchments for extended timeframes, and suggests this has not resulted in NoF attribute values declining below objectives. CFG further notes that expansion of plantations other than onto farmland is generally not possible CFG suggests council monitoring results in some catchments, particularly Horokiwi and Mangaroa, are relatively poor and while harvesting in portions of these catchments has been undertaken in recent years the areas subject to harvest are low. CFG suggests the waterbodies in these catchments pass though large areas of pastoral agricultural land and in the case of the Horokiwi and its main tributary, heavily used highway and the earthworks associated with the recently completed Transmission Gully. CFG considers it is highly likely that a focus on the other land uses will generate the standards required notwithstanding that updated and upgraded attention to sediment controls in forestry earthworks is a legitimate expectation. CFG considers the temporal effects of forestry in relation to land use contaminant effects have not been recognized and while all land use creates contaminant effects, a short term increase in adverse effects that then return to levels similar to natural baseline especially if assisted by other landuse good practice, is very different to an adverse effect (even when mitigated by good practice) arising every day from a land use such as farming or urban use. CFG considers GWRC's assessments of the efficacy of the regulatory framework is based on standards that predate the current regime, noting forestry activity in some catchments has been ongoing since before the NES-PF and NES-CF. CFG suggests that based on GWRC data, the state of stream water quality reflected the cumulative effects of activities predating the NES-PF and the discharge standard of 100g/m3 does not relate to a particular stream attribute, topography, geology or soils of the whaitua and is a uniform standard irrespective of activity or location/circumstance and appears to be principally designed around the use of point source discharges to water from large sediment capture and concentration ponds with fixed infrastructure or without flocculation, which cannot often be utilised in a forestry context. CFG considers the standard difficult to implement, does not deliver real-time feedback, and has no temporal component. CFG notes main methods for managing forestry earthworks are set out in forestry practice guides, and that discharges are largely diffuse. CFG considers this area needs reconsideration and there should be an approach focused on education, training and where necessary enforcement, as recommended by the whaitua committees, rather than new rules and variants of the NES-CF. CFG considers GWRC has assumed that regulations for earthworks and harvesting under the NES-PF have no efficacy toward achieving the goals of the NPS-FM, but at the time of the published data being collected, the NES-PF was new and most of the harvesting that may have contributed to adverse freshwater outcomes had been undertaken in the prior decade. CFG considers GWRC have not considered that as forests progressed through their first to second rotations, normal practice and NES requirements resulted in increased setbacks and retirement and reservation of problematic harvest areas. CFG is concerned that while not all desired data was available, and an absence of such data was not a reason to avoid mitigatory actions, data that was available did not trigger a need or urgency for the whaitua committees to recommend significant and stringent changes to the regulatory framework surrounding forestry. CFG is concerned about the reliance on Regulation 6 of the NES-PF (now NES-CF) to enable rules which require consenting for forestry activities and abandonment of a portion of productive estate without demonstrating the need for this stringency in PC1. CFG considers GWRC's water quality data is insufficient and does not support the stringency upon forestry it seeks to apply. With respect to forestry activities, CFG considers there is insufficient evidence to support the objectives and attribute limits sought and some monitoring sites are already meeting attribute targets, and where not, the relative role of forestry activity is small. CFG considers increased sediment yield relative to pastoral land use is offset by decades of below average yield, and that effects are a permanent day-to-day feature on pastoral sites and that a justifiable, quantifiable link between the action and the water quality response has not been provided for blanket rules to retire an allocated portion of private forestry land use. CFG considers the recommendations of the whaitua committee should be reflected, and effort devoted towards understanding industry practice guides, working with the sector, and focusing on 	

¹⁵ CFG [S288.004] (opposed by Forest & Bird [FS23.028]); [S288.005] (opposed by Forest & Bird [FS23.029]); [S288.006] (opposed by Forest & Bird [FS23.030]); [S288.007] (opposed by Forest & Bird [FS23.031]); [S288.008] (opposed by Forest & Bird [FS23.032])

¹⁶ CFG [S288.009] (opposed by Forest & Bird [FS23.033]); [S288.010] (opposed by Forest & Bird [FS23.034]); CFG [S288.011] (opposed by Forest & Bird [FS23.035]); [S288.012] (supported by NZCF [FS50.014], opposed by Forest & Bird [FS23.036]); [S288.018] (opposed by Forest & Bird [FS23.042]); [S288.019] (supported by NZCF [FS50.018], opposed by Forest & Bird [FS23.043]) and [S288.020] (opposed by Forest & Bird [FS23.044])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>education, awareness, monitoring, compliance and engagement. Notes similar methods are normalised in response to issues around pastoral agriculture (via farm plans), but not for forestry.</p> <ul style="list-style-type: none"> CFG is concerned the s32 report does not adequately demonstrate the need for the stringency proposed in PC1, noting the s32 analysis states forestry is a major land use in the two whitua at 13.5% and 8% respectively and considers these figures unhelpful in isolation from other uses of land, noting it is also stated that the area has recently reached or is nearing commercial maturity, so harvesting is consistently occurring and expected in these FMU. CFG suggests GWRC have undertaken their s32 analysis on the basis of a value judgement comparison between their 'preferred' option being PC1, the 'status quo' and an alternative with additional measures which involves option 1 plus a "exposed area" regulation. CFG has provided their own detailed response to the options assessment of costs, benefits and efficiency and effectiveness in pages 39-43 of their submission. <p>Dougal Morrison across multiple submission points¹⁷ considers:</p> <ul style="list-style-type: none"> There is no justification for bringing in changes to control forestry use beyond the NESCF That the NES-CF should be allowed to bed in before significant changes are made to the NRP GWRC has not provided scientific evidence that forests have caused significant degradation of freshwater quality in the TAoP and TWT catchments The s32 analysis doesn't justify the changes to forestry management rules. GWRC's objectives are broad and it will be difficult to determine whether new regulations for forestry will have a positive effect on water quality GWRC presents a biased view of the role of forestry in the Section 32 report and there is no evidence that the more stringent NES-CF will not achieve GWRC's water quality objectives <p>NZFFA Wellington across multiple submission points make a series of comments about the robustness of evidence supporting PC1 and express a number of concerns as follows:</p> <ul style="list-style-type: none"> NZFFA Wellington¹⁸ suggests the proposed approach to prohibit production forestry from 10% of the steepest forestry land is based on catchment modelling, on the assumption that the steepest land delivers the most sediment to waterways via landslides and is concerned this approach is not based on objective evidence, does not consider other sources of sediment, and is inconsistent with forestry best practice guidelines and scientific literature on forestry erosion. NZFFA Wellington¹⁹ considers prohibition of plantation forestry from the highest 10% relative risk of erosion prone forestry land does not stack up and may not reduce sediment levels in waterbodies NZFFA Wellington²⁰ considers making all forestry a controlled activity is draconian and is not supported by evidence. NZFFA Wellington²¹ suggests GWRC should ask for ESC data used by NES-CF to be reviewed and make a technical case if Wellington, Hutt Valley and Porirua have an erosion risk severe enough to warrant banning plantation forestry and notes national consistency on this matter is desirable. NZFFA Wellington²² suggests rather than prohibit plantation forestry from the steepest slopes Council should explore other ways of mitigating the risk of erosion from steep slopes after harvesting NZFFA Wellington²³ considers the regulations in the NES-CF are sufficient to minimise negative environmental effects of plantation forestry on water bodies, noting the NES-CF has sound scientific backing and that conditions that are more stringent than the NES-CF should be based on compelling evidence about the scale of the problem, including the source of pollutants and that current rules are not working. 	

¹⁷ Dougal Morrison [S3.001; [S3.003] (supported by NZCF [FS50.033]); [S3.005] (supported by NZCF [FS50.034]) and [S3.008] (supported by NZCF [FS50.036])

¹⁸ NZFFA Wellington [S36.005] (supported by NZCF [FS50.161])

¹⁹ NZFFA Wellington [S36.006]

²⁰ NZFFA Wellington [S36.007]

²¹ NZFFA Wellington [S36.011] (supported by NZCF [FS50.163])

²² NZFFA Wellington [S36.012] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.003], supported by NZCF [FS50.164])

²³ NZFFA Wellington [S36.013] (supported by NZCF [FS50.165])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<ul style="list-style-type: none"> NZFFA Wellington²⁴ suggests most sediment arising from plantation forestry operations in Wellington is from roading, skid sites/track making and skidding logs, and stream/river scouring, despite contractors following best practice guidelines and the region has few landslides in forested areas, even after harvesting, noting larger operations using haulers are designed and operated in accordance with best practice guidelines, and earthworks are minimised on steepest slopes. Considers “high risk erosion prone” slopes do not contribute much sediment to water bodies in well managed forests and that under extreme weather events, and time averaged over the life cycle of the forest, steep slopes are comparable to those under continuous native bush cover. NZFFA Wellington²⁵ notes there are no studies that measure the amount of sediment from forestry operations in the TAoP or TWT Whaitua and the modelling that has occurred is based on broad assumptions. NZFFA Wellington suggest Wellington forests have minimal erosion problems and therefore have not been closely studied, and science work has been focused on highly erosion prone land in other areas. NZFFA Wellington suggest it is not possible to allocate equitable contributions to reducing sediment loads without data on the relative contributions of sediment from natural sources, forestry, pastoral farming and urban/roading development. NZFFA Wellington²⁶ suggests current GWRC data for catchments with high levels of plantation forest do not indicate elevated levels of deposit fine sediment and suggests that high levels of fine sediment in the Hutt River are related to flood protection activities NZFFA Wellington²⁷ cites NZ literature which indicates Wellington has relatively stable hill country soils which are desirable for forestry operators. NZFFA Wellington suggests the risk of landslide for Wellington, Porirua, and Hutt Valley soils is lower than for unreinforced bare soil. NZFFA Wellington²⁸ notes bare land in a harvested pine forest, whilst not having a canopy to intercept rainfall, does not behave like unprotected bare soil. There is no specific data differentiating various sources of sediment in Wellington water bodies and to understand the implications of potential solutions for forestry, there should be breakdown of sediment yields between soil disturbance factors, at different stages of the forestry cycle. NZFFA Wellington considers urban and pastoral land cover classes are worse than predominantly plantation forestry catchments and native catchments. NZFFA Wellington²⁹ notes a Hawke’s Bay study which suggests forestry performed better than adjacent pasture, and that earthworks including road making was a substantial contributor to sediment in the stream and cites another study that risk of shallow slips on non-wooded greywacke steep slopes is less than for other soil types. NZFFA Wellington suggests GWRC obtain data on shallow landslide incidence after harvest from their own forests to determine if retiring steepest slopes from forestry impacts sediment in water bodies. NZFFA Wellington³⁰ considers the expectation in PC1 for plantation forestry to produce little more sediment than the same catchment would under natural cover is unrealistic with current land-based harvesting and stem/log transport technology and pastoral, intensive farming, horticulture and arable/market gardening do not seem to be held to the same expectation. NZFFA Wellington considers sediment production from the natural state is not well quantified and achieving sediment rates close to the natural state is an unrealistic goal that does not take into account climate change, effects of earthquakes and volcanic eruptions, land use changes and clearance and natural processes. NZFFA Wellington suggests there is little awareness of recent 'natural' sedimentation dynamics (e.g. influence of feral animals, deer, goats, pigs) or increases in sediment from unmodified natural catchments and natural sediment levels of any particular waterway will depend on stream size and water volume, steepness, state of vegetation cover, input from mineral rich seepages and iron and other mineral oxides. NZFFA Wellington notes water quality is only routinely monitored at a few readily accessible sites low down in the catchment and questions what 'natural state' means in relation to managing forestry sediment loss, how individual land managers up-stream can be individually be held accountable if natural state and TAS can only be determined at defined regular monitoring sites, and whether TAS are realistic taking account of dynamics of natural systems including increased erosion caused by climate change or earthquakes. NZFFA Wellington³¹ considers it unreasonable to set worst case stormwater sediment discharges for forestry cycles as if they operate at the same frequency each year, or with every rain event. NZFFA Wellington suggests it more equitable to time-average discharge limits for forestry over a 25-35 year 	

²⁴ NZFFA Wellington [S36.016]

²⁵ NZFFA Wellington [S36.017] (supported by NZCF [FS50.166])

²⁶ NZFFA Wellington [S36.019]

²⁷ NZFFA Wellington [S36.021]

²⁸ NZFFA Wellington [S36.022]

²⁹ NZFFA Wellington [S36.023]

³⁰ NZFFA Wellington [S36.024]

³¹ NZFFA Wellington [S36.025] (supported by NZCF [FS50.168])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>period and insufficient understanding is demonstrated in PC1 of sediment loss to waterways within a cyclic forestry environment. NZFFA Wellington considers the peak point source sediment limits of 100g/m³ unrealistic and that it is better to define forestry best practice and audit to those standards.</p> <ul style="list-style-type: none"> NZFFA Wellington³² suggests data is needed to determine where sediment is coming from but it is likely forestry earthworks, including roading and associated batters, culverts, stream crossings, use of skidders, for plantation forestry are much more frequent and significant sources of sediment than shallow land slide and surficial erosion from steep slopes after tree harvest. NZFFA Wellington considers forestry roadworks and associated harvesting earthworks can generally be managed to minimise but not eliminate sediment loss to waterways, but rather than focus on extremely conservative peak discharge limits, the sediment losses over the whole forestry cycle need to be factored in. The submitter has not observed evidence that steep slopes are producing significant areas of shallow landslides (Upper Hutt area) and suggests GWRC produce evidence from their own forests rather than rely on modelling. NZFFA Wellington³³ suggests the s32 report lacks logic and underestimates financial impacts and that greater than 10% of land taken out of production forestry will have long term impacts and reduce the benefits of plantation forestry. NZFFA Wellington notes the desire for equitable processes to achieve the TAS but consider this should not be about everyone adjusting by an equal amount but about quantifying the problem and minimising environmental risk by targeting the highest contributors of sediment. The submitter notes forestry is a controlled activity but not pastoral farming when the literature indicates pastoral farming activities are far more likely than forestry to release sediment and other contaminants into waterbodies NZFFA Wellington³⁴ notes the majority of published evidence shows plantation forestry is better than pastoral farming in highly erodible zones in relation to soil disturbance and sediment runoff and acknowledges some sensitive harbours and estuaries are silting up but the relative contributions from Wellington area forestry vs natural or other land activities is not known. NZFFA Wellington considers the case put forward by GWRC is weak, based on a false premise that steepest forestry land will deliver most of the sediment and some of the evidence (visual clarity and sediment yields) is factually incorrect. NZFFA Wellington notes the NES-CF has been revised with tighter controls and has only just been implemented. NZFFA Wellington is concerned there are serious errors in the assigned TAS values and the gravity of the situation does not warrant overriding the NES-CF and that it is unknown whether the original NES-PF had any effect, noting data suggests deposited fine sediment in some forestry catchments has improved since 2013-2015. NZFFA Wellington are concerned the rules are being tightened instead of undertaking enforcement. NZFFA Wellington³⁵ considers the concern that increasing forestry operations will worsen sediment does not account for a number of factors, including earthworks often being one-off and done at the end of the forest cycle; improvements in harvesting technology; reductions in manual tree felling; the potential for airship assisted harvesting; and improved tools to identify and manage sensitive areas. NZFFA Wellington suggests sensitive erosion prone areas should be identified and micromanaged. 	
Economic impacts	<p>Several submitters³⁶ are concerned that PC1 is a major disincentive for investment in forestry and would render forestry land uneconomic and may lead to claims under s85 of the RMA. This includes:</p> <ul style="list-style-type: none"> David Bennett & Jenni Lean Robin Chesterfield Richard Swan Hamish Levak Jeremy Collyns Peter Kiernan Annette Cairns 	<p>See footnotes</p> <p>Southern North Island Wood Council [S262.006] and [262.008]</p> <p>Dougal Morrison [S3.009] (supported by NZCF [FS50.037]); [S3.014]</p>

³² NZFFA Wellington [S36.026] (supported by NZCF [FS50.169])

³³ NZFFA Wellington [S36.032] (supported by NZCF [FS50.172])

³⁴ NZFFA Wellington [S36.033] (supported by NZCF [FS50.173])

³⁵ NZFFA Wellington [S36.034]

³⁶ David Bennett & Jenni Lean [S184.002]; Robin Chesterfield [S25.002], [S25.003]; Richard Swan [S47.002], [S47.003]; Hamish Levak [S49.002], [S49.003]; Jeremy Collyns [S52.002], [S52.003]; Peter Kiernan [S54.002] (supported by NZCF [FS50.118]); Annette Cairns [S55.002] (supported by NZCF [FS50.002]), [S55.004] (supported by NZCF [FS50.004])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>NZFFA across multiple submission points³⁷ considers the proposed rules are a disincentive for investment in commercial forestry and are likely to negatively impact opportunities to obtain an adequate return, suggesting the conditions, or costs of meeting the conditions, will prevent land from being harvested and the “highest risk” classification devalues the land and prevents the forest owner from obtaining an income from it. NZFFA considers PC1 will make it impossible for many forest owners to provide for their economic well-being or to make reasonable use of their land and this is expected to apply to the following situations:</p> <ul style="list-style-type: none"> • where forest land is classed as “highest risk,” the owner will not be able to derive any revenue from its post-harvest, despite the continuing costs of rates and property maintenance. Small parts of a block classified as erosion prone may be essential for access or for harvest infrastructure and if they are not used, the forest might not be harvested becoming a stranded asset • it may be impossible to meet all forestry activities conditions in PC1 for example maximum sediment level of 100 grams / m3 of runoff and compliance costs may be simply too high to bother • NZFFA also notes the report omits mentioning that GWRC could be liable for compensation to China Forestry Group if PC1 goes ahead. NZFFA suggests the costs of PC1 have been understated and the analysis does not appear to quantify impacts on plantation forestry in the region. <p>Southern North Island Wood Council notes commercial forestry is a major export earner and employer of local people and service providers during establishment, management and harvesting and in the two Whaituas the total area in plantation forest is almost 12,000 ha. As well as income and employment, plantation forests provide major environmental benefits relating to climate regulation, reducing erosion, and preventing sediment getting into waterways and that the Climate Change Commission has recommended a national increase in the plantation forest estate by 500,000 ha between 2021 and 2030. Southern North Island Wood Council considers that PC1 deters investment in commercial forestry, primarily due to the proposed rules and associated costs, which may hinder harvesting of certain lands and is concerned that the “highest risk” classification of land will diminish land value for forest owners.</p> <p>Dougal Morrison is concerned forestry owners will not be able to generate income post-harvest but costs, such as rates and maintenance will continue and that additional costs for planning, documentation, experts and consent fees will be incurred and benefits from carbon sequestration will be reduced</p>	
ETS impacts	<p>Juken NZ notes concerns about the lack of consideration for ETS implications with the removal of land from production and suggests that no consideration has been given to ETS implications for forestry land that has been categorised in the top 10% of the highest erosion land and notes that land that can't be replanted will lead to liabilities under the ETS.</p> <p>Southern North Island Wood Council are concerned about the level of consideration given to impacts on ETS requirements. Southern North Island Wood Council considers there has been no consideration of ETS implications with the removal of land from production and PC1 will severely impact forest owners in the region with ETS registered forests with one member of the submitter's organisation expected to lose between 4% and 18% of productive area by forest, which equates to 330ha with the ETS Liability on this area at current prices approximately \$18 million NZD.</p> <p>NZFFA considers PC1 will reduce the chances of meeting climate change directives advocating increased planting of exotic forests between 2021 and 2030 and that PC1 deters the submitter from advising planting trees as a long-term investment. NZFFA notes that under the ETS, owners are required to retain their land in forests after harvest and if forest land is not replanted, it will generate no income and become a financial liability for the owner, while adding nothing to the region's social and economic wellbeing.</p> <p>NZCF notes PC1 is silent on implications in respect of NZs climate change response and the contribution forestry makes to this response. In particular NZCF notes PC1 has not given any consideration to Emissions Trading Scheme, which is established and comprehensively managed under Climate Change Response Act 2002, including obligations and liabilities therein. For instance, the liability and costs for deforestation, is directly contrary to New Zealand's Emissions Reduction Plan (made in accordance with section 5Z1 of the Climate Change Response Act 2002) and is not consistent with New Zealand's National Adaptation Plan (made in accordance with section 5Z1 of the Climate Change Response Act 2002). NZCF seeks PC1 be withdrawn (or not included in the plan).</p> <p>CFG considers the obligations under the ETS have not been given consideration and questions why a forest owner should pay for restocking an area for the benefit of the wider public, to avoid liabilities from a rule created in the wider public interest. CFG questions who will bear the cost and the liability of ongoing management of native forest reforestation and the risk and cost of a ETS compliant forest where reversion is the chosen route. CFG is concerned non-harvest may be the best option for forest owners due to the cost of PC1 and lack of future economic land use options, and questions who will compensate for stranded assets or potential liabilities if there is synchronous collapse, suggesting proposed compensation and assistance methods are practically worthless</p> <p>NZFFA Wellington considers the performance requirements for woody vegetation replacing pastoral land is a low expectation compared to performance of exotic timber species in managed plantations, and does not meet ETS performance standard for pre-1990 forestry succession. NZFFA Wellington considers there is potential to improve carbon sequestration by encouraging managed exotic forestry species and suggests rather than banning production forestry from</p>	<p>Juken NZ [S191.001] (supported by NZCF [FS50.084]) and [S191.004] (supported by NZCF [FS50.086])</p> <p>Southern North Island Wood Council [S262.003] (supported by NZCF [FS50.136]); [S262.005] and [S262.010] (supported by NZCF [FS50.138])</p> <p>NZFFA [S195.006] (opposed by Forest & Bird [FS23.409])</p> <p>NZCF [S263.009] (opposed by Forest & Bird [FS23.380])</p> <p>CFG [S288.001] (supported by NZCF [FS50.012], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.107], opposed by Forest & Bird [FS23.025]) and [S288.017] (opposed by Forest & Bird [FS23.041])</p> <p>NZFFA Wellington [S36.028] (supported by NZCF [FS50.170])</p>

³⁷ NZFFA [S195.006] (opposed by Forest & Bird [FS23.409]); [S195.009] (opposed by Forest & Bird [FS23.412])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	steepest slopes, alternative timber species, permanent forestry, carbon forestry continuous cover forestry / close to nature forestry could be considered to reduce risk of sediment loss	
Unintended consequences	<p>CFG considers the total area of compulsory retirement could be substantially greater than assessed by GWRC and is concerned there is the potential for the total write-off of plantation sites, and that this should have been assessed in the s32 analysis.</p> <p>Dougal Morrison is concerned if highly erodible land is unable to be re-planted post-harvest, the land will revert to unmanaged forests and this could create problems of trees falling into streams or causing shading of streams.</p> <p>Peter Handford is concerned PC1 creates a blanket exclusion for “highest erosion risk” areas without recognising the range of forest management options and considers this removes potential for forest management to provide ecosystem services including biodiversity, carbon sequestration, soil and water protection and recreation. The submitter considers innovative and environmentally sensitive forest management approaches should be facilitated and encouraged as low impact forestry management is possible without negative impacts</p> <p>NZFFA Wellington³⁸ is concerned about aspirational targets becoming regulation in PC1 and questions whether this is fair and reasonable noting plantation forestry historically does not compete for highly productive land used for food production, but rather occupies low fertility and more erosion prone hill country and the erosion, carbon services and other ecosystem services provided by plantation forestry are highly valued. NZFFA considers the requirement for plantation forestry to release no more sediment to water bodies than existed in the natural state is unrealistic and notes erosion events will be more frequent and intense due to climate change. NZFFA Wellington is concerned PC1 will set a precedent in NZ and the high compliance costs, certification of plans, auditing, and the inability of current forestry best practise and technology to deliver desired outcomes could put plantation forestry in hill country out of business and clause 1.3.5(c) of the NPS-FM is being overlooked in favour of an unrealistic vision for the health and wellbeing of waterbodies.</p> <p>NZFFA Wellington³⁹ considers PC1 proposals are naïve about the implications for plantation forestry, ill thought out and subject to unintended consequences. States there is no evidence presented that retiring out the steepest ('most erosion prone') plantation forest land will improve sediment outcomes in waterways and leakage of sediment could get worse if management practices have to change.</p> <p>NZFFA Wellington⁴⁰ considers that if plantation forestry were prohibited from “highest risk erosion prone” slopes, regeneration of pine, gorse and other weeds would be likely, and that regeneration of native vegetation is unlikely and trees toppling could generate sediment. Considers retiring of steepest land will affect the viability of current forestry operations. Noting that if cable harvesting can no longer be undertaken due to mid-slopes no longer having plantation forestry, then machine access must be along low-lying territory with more crossings of streams and seepages, thereby exacerbating sediment and erosion issues.</p> <p>NZFFA Wellington⁴¹ notes the following unintended consequences:</p> <ul style="list-style-type: none"> Prohibiting plantation forestry from steep slopes will alter the forestry management plans as production forests may then be restricted to broad ridge lines and lower slopes/valley floors and sediment discharges from forestry roading and tracks may get worse. NZFFA Wellington notes if cable logging cannot be undertaken, there may be an increased use of ground-based log transport which creates more soil disturbance and soil compaction than that caused by cable logging. NZFFA Wellington considers more stream crossing and seepage crossing, and faster and heavier runoff flows from the upper slopes will also impact earthworks and in the narrow valleys there is often limited space available to install structures to manage sediment near waterways. Notes the potential for large scale wilding pines and unmanaged trees will grow tall and thin and be subject to disease, stem breakage and toppling in storms and as wilding pines get older, they will produce large amounts of seed and there is likely to be a public backlash about a perceived wilding pine problem NZFFA Wellington is concerned larger areas of land than mapped will become uneconomic to grow and harvest trees from, individual parcels will no longer be able to operate and may not be eligible to join an ETS which could trigger claims for compensation or a RMA section 85 claim, particularly because pastoral farmers have been encouraged to use plantation forestry (as well as permanent forestry and native revegetation) for Government sponsored Hill Country Erosion programmes, other subsidised planting schemes (e.g. Billion Trees) as well as offsetting livestock GHG emissions and prohibition of plantation forestry on steep slopes will significantly reduce their options Considers it is likely after harvesting erosion prone land landowners will allow natural regeneration to occur rather than replanting which will invariably be dense groves of pine seedlings which quickly achieve canopy coverage, but will grow tall and thin and be subject to disease, stem breakage and 	<p>CFG [S288.015] (supported by NZCF [FS50.017], opposed by Forest & Bird [FS23.039])</p> <p>Dougal Morrison [S3.010] and [S3.015]</p> <p>Peter Handford [S280.004] (supported by NZCF [FS50.117])</p> <p>Alan Bell & Associates [S48.002]</p>

³⁸ NZFFA Wellington [S36.014]³⁹ NZFFA Wellington [S36.015]⁴⁰ NZFFA Wellington [S36.027]⁴¹ NZFFA Wellington [S36.028] (supported by NZCF [FS50.170])

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
	<p>toppling in storms. NZFFA Wellington notes as wilding pines get older, they will produce large amounts of seed and there is likely to be a public backlash about a perceived wilding pine problem and questions who will be accountable for this problem</p> <p>Allan Bell & Associates suggests proposed planning and paperwork increases in PC1 may lead to forest owners seeking a quick way out by harvesting and not continuing with another rotation resulting in the loss of significant areas of productive land. The submitter considers that GWRC should make sure the forest owners do a good job of their roading on all types of land and notes the landowner gets to utilise their investment in land and infrastructure and water quality due to there being ongoing interest in the land</p>	
Alignment with national direction	<p>UHCC seek to delete or significantly amend provisions circumventing and not giving effect to, higher order documents without clear reasoning or supporting evidence within the section 32a assessment, i.e. rules surrounding plantation forestry trying to provide a higher level of protection than is allowed under the National Environmental Standards Commercial Forestry.</p> <p>JTL across multiple submission points⁴² makes the following comments</p> <ul style="list-style-type: none"> JTL expresses concern PC1 duplicates or replaces existing controls under the NES-CF, including use of erosion mapping and management plan requirements JTL promotes the correct application of stringency under the NES-CF for specific additional controls to the existing NES-CF framework to address water quality concerns, as the preferred approach and an alternative to PC1 JTL supports principles of Te Mana o te Wai but considers any rule, policy or objective of PC1 intended to give effect to Te Mana o te Wai must demonstrate it is necessary to do so <p>NZCF notes that PC1 acknowledges the NESCF came into force on 3 November 2023, but does not give explicit consideration to whether the NESCF (and particularly amendments that strengthen the approaches to the management of adverse effects of forestry related activities) are able to achieve the stated outcome of PC1, being the reduction of sediment in rivers in the two Whāitua's (inferred). NZCF suggests the NESCF is a national direction planning instrument, noting the purpose and role in the hierarchy of RMA planning instruments and that it is important for Council to allow the NESCF to be appropriately implemented (including required monitoring). NZCF considers it is premature for Council to promulgate a plan change to regulate production forest activities when new regulations have been made and seeks PC1 is withdrawn (or the Proposed Plan Change is not included in the NRP) until such time as the efficiency and effectiveness of NESCF has been monitored and results of such monitoring support the need for provisions in NRP.</p> <p>NZFFA Wellington⁴³ notes a new version of the NES-CF is in force and has stronger environmental controls and considers GW should allow the new NES-CF to bed in and actively monitor compliance and land performance (commission research) and withdraw the prohibition on harvest in the meantime. Failing this, NZFFA Wellington considers GW should exempt forestry under 20ha as a Controlled Activity.</p> <p>David and Carolyn Gratton believes the NES-CF has tighter controls than the NES-PF and should be given time to bed in before controls which go beyond the NES-CF are imposed. The submitter notes the additional requirement to provide an erosion and sediment control plan early in the soil disturbance process is unrealistic and unreasonable.</p>	<p>UHCC [S225.017] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.008], opposed by Forest & Bird [FS23.845])</p> <p>Juken NZ [S191.003] (supported by NZCF [FS50.085])</p> <p>NZCF [S263.004] (opposed by Forest & Bird [FS23.375])</p> <p>Southern North Island Wood Council [S262.001]</p> <p>NZFFA Wellington [S36.008] and [S36.010] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.001], supported by NZCF [FS50.162])</p> <p>David and Carolyn Gratton [S58.004] (supported by NZCF [FS50.030])</p>

⁴² JTL [S237.003] (supported by NZCF [FS50.077]); [S237.005] (supported by NZCF [FS50.079]); [S237.006]; [S237.007]; [S237.008] (supported by NZCF [FS50.080]) [S237.010] (supported by NZCF [FS50.082]); [S237.011] (supported by NZCF [FS50.083], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.016])

⁴³ NZFFA Wellington [S36.008] and [S36.010] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.001], supported by NZCF [FS50.162])

Issue 17: Other matters

Sub-issue(s)	Description of matters raised by submitters	Submission reference(s)
Method M44	CFG seek for Method M44 to be amended to include “ <i>deliver a specific programme of engagement with forestry practitioners</i> ” to reflect the recommendations of the whitua committees.	CFG [S288.037] (opposed by Forest & Bird [FS23.061])
Wildfire	Heather Phillips is concerned PC1 does not mention wildfires and there is no mitigation/planning/prevention of wildfires in the plan. The submitter considers the plan needs fire risk mitigation measures, including: access to water (dams, tanks and spacing, size of same required); setback requirements of ALL vegetation from powerlines; clear areas around houses and built up areas; safety for escape routes; and knowledge of burn rates to tree species in New Zealand	Heather Phillips [S212.002] (supported in part by WFF [FS17.001])