

Appendix 5: Table of recommendations on submissions

For text in the 'Decision requested' column that shows additions and deletions in colour, please see the original submission on the PC1 website: <https://www.gw.govt.nz/your-region/plans-policies-and-bylaws/updating-our-regional-policy-statement-and-natural-resources-plan/natural-resources-plan-2023-changes/consultationssubmitters/>

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S100.001	Julian Bateson			2 Interpretation	General comments - overall	Not Stated		Supports the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Associations' submissions.	Not stated		No recommendation
S102.002	Donald Love			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend		Considers risks should be assessed as the impacts of another rotation on tracked and managed land could be worse than other options.	Seeks that there be no new forestry on highest erosion land but additional rotations of existing forestry should be considered on impacts.		Accept in part
S102.002	Donald Love	FS50.031	New Zealand Carbon Farming Group ('NZCF')	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Support in part	NZCF supports the submission to the extent that the submission suggests that the provisions that relate to plantation forestry should be based on a consideration of risks.	Allow in part	Not stated	Accept in part
S102.004	Donald Love			2 Interpretation	B Management objectives	Amend		Concerned any attempt to modify highly exposed land may have a net negative impact, particularly in shallow soils.	(b) define "land in a natural state". (d) make revegetation optional.		Reject
S102.005	Donald Love			2 Interpretation	B Management objectives	Amend		Notes there is a perception that forestry has been a significant contributor to sediment discharge. Concerned that good management practices have not been well defined or monitored.	Retain B1.		Reject
S104.001	Chris and gwen Bossley			2 Interpretation	Afforestation	Oppose		Supports the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Associations' submission.	No decision requested but opposes the plan change.		No recommendation
S105.001	Hannah Bridget Gray (No2) Trust			##	2.2 Definitions	Amend		PC1 repeats 'woody vegetation' as a target state, concern around lack of proper definition and landowners being able to achieve this state. If term is defined in other legislation should be referenced properly.	Provide a clear definition of what constitutes "woody vegetation".		Reject
S105.017	Hannah Bridget Gray (No2) Trust			8 Waitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.	Amend		There are many pest plants in the region, and some such as Gorse should be considered carefully before removal due to acting as a nursery for native vegetation. Considers clarity is required about what is a pest and what is not.	A definition of pest plants is required.		Accept
S111.001	Forest Enterprises			2 Interpretation	General comments - overall	Oppose		Supports submissions of China National Forestry Group, John Turkington Limited, NZ Farm Forestry Association and Juken New Zealand Limited	Not stated		No recommendation
S111.002	Forest Enterprises			2 Interpretation	General comments - overall	Oppose		Considers Rules WH.R17 to WH.R22 and Rules P.R16 to P.R21 neglect to acknowledge the precedence of the National Environmental Standards of Plantation Forestry (NESPf) and National Environmental Standards of Commercial Forestry (NESCf). NESCf recognises need for flexibility to protect sensitive local environments and notes Regional and District Councils can be more stringent or more lenient but needs to be based on assessments of science and encompasses all environmental, social, and economic factors including those already in place.	Not stated		No recommendation
S111.002	Forest Enterprises	FS30.056	Pukerua Holdings Limited	2 Interpretation	General comments - overall		Support	Agrees that rules WH.R17 to WH.R22 and Rules P.R16 to P.R21 neglect to acknowledge the precedence of the National Environmental Standards of Plantation Forestry (NESPf) and National Environmental Standards of Commercial Forestry (NESCf).	Allow	Support submission point in full	No recommendation
S111.002	Forest Enterprises	FS50.057	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCf, and the necessity for more stringent rules has been appropriately evaluated.	Allow	Not stated	No recommendation

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S111.003	Forest Enterprises			2 Interpretation	General comments - current legislation	Oppose		Considers where councils are proposing a new rule that is more stringent than the NES-PF, there is a requirement to demonstrate the more stringent rule is justified in the context of the region/district in accordance with section 32(4) of the RMA. Notes guidance is also included within the NES-PF Plan Alignment Guidance prepared by MPI. Notes more stringent rules under Regulation 6(1)(a) must firstly to demonstrate the NES-PF controls are not sufficient to achieve a plan objective that gives effect to the NPS-FM and then how a more stringent rule will achieve that objective in a more effective and efficient way than the NES-PF. Suggests roving a link between a proposed rule and a plan objective that gives effect to the NPS-FM is not sufficient. Notes section 32(4) of RMA also requires councils to demonstrate proposed rules (including rules being rolled over as part of a plan review) are justified in the context of the region/district.	Not stated		No recommendation
S111.003	Forest Enterprises	FS30.057	Pukerua Holdings Limited	2 Interpretation	General comments - current legislation		Support	Agrees that where councils are proposing a new rule that is more stringent than the NES-PF, there is a requirement to demonstrate the more stringent rule is justified in the context of the region/district in accordance with section 32(4) of the RMA.	Allow	Support submission point in full	No recommendation
S111.003	Forest Enterprises	FS50.058	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF supports the submission for the reasons given and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S111.005	Forest Enterprises			General comments	General comments - plantation forestry	Oppose		Considers GWRC have ignored statements made by Easton, Nation and Blyth. Considers technical memorandum does not consider land that is replanted back into plantation forestry., the stability that plantation forestry provides by its root structures, wind protection, wildlife habitat that is not found in pastoral landscapes as well as rainfall uptake, all of which reduce erosion and landslides. Considers methodology used to identify landslide risk was over simplified and lacks local information. Considers geology and aspect was not accounted for. Considers the analysis and recommendations unjustified. Expects PC1 to require sediment mitigations on identified erosion risk areas. Considers appropriate mitigation type and extent will vary depending on physical factors such as slope, aspect, site access and pest-control, and non-physical factors such as cost and landowner cooperation. Considers a site-specific assessment, which has same purpose as the required Harvest and Earthworks plans (schedule 4 & 6) of NESCF, provides more appropriate mitigation measures than the generalised PC1.Considers it unjustified to propose rules that impact land-disturbing activities if they were ignored. Considers intention of Easton, Nation and Blyth technical memorandum has been misused by GWRC as a forementioned, a site-specific field assessment and expert advice prevails.	Not stated		No recommendation
S111.005	Forest Enterprises	FS50.059	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given and for the reasons set out in NZCF's primary submission.	Allow	Not stated	No recommendation
S111.006	Forest Enterprises			General comments	General comments - plantation forestry	Oppose		Considers NES-CF has rules and controls for total suspended solids and plantation forestry discharge and seeks justification on how rules in PC1 provide greater positive environmental outcomes.	Not stated		No recommendation
S111.006	Forest Enterprises	FS30.059	Pukerua Holdings Limited	General comments	General comments - plantation forestry		Support	Agrees that NES-CF has rules and controls for total suspended solids and plantation forestry discharge	Allow	Support submission point in full	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								and seeks justification on how rules in PC1 provide greater positive environmental outcomes.			
S111.006	Forest Enterprises	FS50.060	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S111.007	Forest Enterprises			2 Interpretation	General comments - overall	Oppose		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.	Not stated		No recommendation
S111.008	Forest Enterprises			General comments	General comments - plantation forestry	Oppose		Considers no recommendations from the Whaitua committees or the forestry industry have been implemented which reflect the proposed rules for plantation forestry. Notes as acknowledged in the Whaitua Committee reports, Regional Councils 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. Considers lack of evidence that GWRC has engaged forestry groups. Considers Implementing new compliance roles does not achieve this recommendation.	Not stated		No recommendation
S111.008	Forest Enterprises	FS50.061	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission. NZCF similarly welcomes the opportunity to consult with the forestry industry.	Allow	Not stated	No recommendation
S111.009	Forest Enterprises			2 Interpretation	General comments - overall	Oppose		Considers environmental outcomes Te-Awarua-o-Porirua and Te-Whanganui-a-Tara have recommended are not reflected by the proposed NRP rules. Considers oversimplifying slope and not factoring forestry activities, yet proposing rules on this basis, is scientifically and logically inconsistent. Considers whaitua recommendations consistent with the National Environmental Standards of Commercial Forestry and provides the site-specific assessments needed. Submitter invite GWRC to consult with forestry industry and evaluate level of stringency that NESCF already provides.	Not stated		No recommendation
S111.009	Forest Enterprises	FS50.062	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission. NZCF similarly welcomes the opportunity to consult with the forestry industry.	Allow	Not stated	No recommendation
S111.010	Forest Enterprises			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.011	Forest Enterprises			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.012	Forest Enterprises			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.013	Forest Enterprises			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.014	Forest Enterprises			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.015	Forest Enterprises			8 Whaitua Te	Rule WH.R22: Plantation forestry	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation

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				Whanganui-a-Tara	on highest erosion risk land – prohibited activity.						
S111.016	Forest Enterprises			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.016	Forest Enterprises	FS30.060	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Support	Agrees that Rule P.R16 does not acknowledge the precedence of the NES-PF and NES-CF	Allow	Support submission point in full	No recommendation
S111.017	Forest Enterprises			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.017	Forest Enterprises	FS30.061	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Agrees that Rule P.R17 does not acknowledge the precedence of the NES-PF and NES-CF	Allow	Support submission point in full	No recommendation
S111.018	Forest Enterprises			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.018	Forest Enterprises	FS30.062	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Agrees that Rule P.R18 does not acknowledge the precedence of the NES-PF and NES-CF	Allow	Support submission point in full	No recommendation
S111.018	Forest Enterprises	FS30.063	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Agrees that Rule P.R19 does not acknowledge the precedence of the NES-PF and NES-CF	Allow	Support submission point in full	No recommendation
S111.018	Forest Enterprises	FS30.064	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Agrees that Rule P.R20 does not acknowledge the precedence of the NES-PF and NES-CF	Allow	Support submission point in full	No recommendation
S111.018	Forest Enterprises	FS30.065	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Agrees that Rule P.R21 does not acknowledge the precedence of the NES-PF and NES-CF	Allow	Support submission point in full	No recommendation
S111.019	Forest Enterprises			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.020	Forest Enterprises			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.021	Forest Enterprises			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Oppose		Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated		No recommendation
S111.022	Forest Enterprises			9 Te Awarua-o-Porirua Whaitua	Rule R104: Vegetation clearance on erosion prone land – permitted activity.	Oppose		No reason specifically stated	Not stated		No recommendation
S111.023	Forest Enterprises			9 Te Awarua-o-Porirua Whaitua	Rule R107: Earthworks and vegetation clearance – discretionary activity.	Oppose		No reason specifically stated	Not stated		No recommendation

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S16.011	Pauatahanui Residents Association			8 Waitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.	Amend		There are many different pest plants within the region with different effects on native vegetation.	Provide definition for pest plants		Accept
S17.001	John Easter			General comments	Highest erosion risk land (plantation forestry)	Oppose		Considers Makara and Ohariu catchments are faulted with variable aspects and topography. Potential erosion varies within sub catchments, which cannot be determined through aerial scanning data.	Considers erosion potential of all land must be based on evidence from site investigation. Considers Map 92 is not fit for purpose other than as a tool to indicate where specific site investigation should be undertaken.		Accept
S17.004	John Easter			General comments	Highest erosion risk land (woody vegetation)	Amend		Considers Makara and Ohariu catchments are faulted with variable aspects and topography. Potential erosion varies within sub catchments, which cannot be determined through aerial scanning data.	Considers erosion potential of all land must be based on evidence from site investigation. Considers Map 92 is not fit for purpose other than as a tool to indicate where specific site investigation should be undertaken.		No recommendation
S17.004	John Easter	FS47.121	Meridian Energy Limited	General comments	Highest erosion risk land (woody vegetation)		Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;	Allow	Allow S17.004.	No recommendation
S177.006	Transpower New Zealand Limited			2 Interpretation	General comments - definitions	Not Stated		Concerns the vegetation clearance provisions on 'high erosion risk land' do not recognise need to undertake vegetation clearance to prevent encroachment of woody vegetation on National Grid transmission lines and support structures. Submitter is not opposed to revegetation generally, but 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. Questions appropriateness of mapping used to identify where resource consent is required for vegetation clearance. Notes mapping includes small and incohesive areas of vegetation, and questions efficiency or effectiveness of regulating these. Considers maps should be amended to only identify cohesive areas of vegetation being subject to rules. Seeks specific reference to NESETA at start of chapter to highlight NESETA regulations to plan users.	Amend maps to only identify cohesive areas of vegetation being subject to rules. Include specific reference to NESETA at start of chapter to highlight NESETA regulations to plan users.		Accept in part
S177.006	Transpower New Zealand Limited	FS23.749	Forest & Bird	2 Interpretation	General comments - definitions		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S177.011	Transpower New Zealand Limited			General comments	Highest erosion risk land (woody vegetation)	Neutral		Not stated	Retain as notified (noting the submission points on the maps and provision).		Reject
S177.011	Transpower New Zealand Limited	FS23.754	Forest & Bird	General comments	Highest erosion risk land (woody vegetation)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S177.038	Transpower New Zealand Limited			8 Waitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest	Amend		Notwithstanding concerns raised in this submission regarding the mapping of 'highest erosion risk land (woody vegetation)', submitter seeks amendment to R17.Regular vegetation clearance to prevent	Amend rule as follows:Rule WH.R17: Vegetation clearance on highest erosion risk land Vegetation clearance on highest erosion risk land (woody		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					erosion risk land – permitted activity.			vegetation from encroaching on National Grid transmission lines and structures (beyond that provided in Electricity (Hazards from Trees) Regulations 2003) is a necessary part of maintaining safe and efficient operations of electricity transmission network. Providing for vegetation clearance underneath or near National Grid transmission lines or structures as a permitted activity is necessary in order to give effect to policy 5 of NPSET, which requires that the reasonable operational and maintenance requirements of the National Grid are provided for, and policy 10 of NPSET, which requires operation and maintenance of electricity transmission network is not compromised. Seeks to add a subclause to clause (a) to clarify that vegetation clearance of less than 200m2 per property per year is permitted activity (on the basis that clearance of more than 200m2 is a controlled activity under rule WH.R18). Considers it necessary to avoid clearance of less than 200m2 becoming an innominate activity (and therefore discretionary). Clarification is sought as to how the 200m2 is calculated – is it the identified woody vegetation or on a site which contains an area of woody vegetation. Opposes rule being included within freshwater planning instrument, as the purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met:(a) the vegetation clearance is:(i) for no more than a total area of 200m2 per property in any consecutive 12-month period, or (ii) to implement an action in the erosion risk treatment plan for the farm, or(iii) for the control of pest plants, and or(iv) for the purposes of operating or maintaining the National Grid, and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		
S177.038	Transpower New Zealand Limited	FS23.781	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S177.038	Transpower New Zealand Limited	FS47.228	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow in part	Allow S177.038 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Accept in part
S177.039	Transpower New Zealand Limited			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Subject to submitters relief being granted on rule WH.R17 (submission point 42) submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Considers the rehabilitation of areas of cleared vegetation (under matter of control 3) should not be undertaken in a manner or in locations where vegetation would encroach on National Grid lines or structures. Considers that an additional matter of control is necessary to address this matter. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Amend rule as follows: Rule WH.R18: Vegetation clearance on highest erosion risk land Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200m2 per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this Rule. Matters of control		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>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 not exceed that which occurred from the land prior to the vegetation clearance occurring</p> <p>2. The area, location and method of vegetation clearance</p> <p>3. Stabilisation and rehabilitation of the area cleared</p> <p>4. 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</p> <p>5. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan</p> <p>6. The time and circumstances under which the resource consent conditions may be reviewed</p> <p>7. The need for any rehabilitated areas of vegetation to be clear of National Grid transmission lines and support structures.</p> <p>In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.</p>		
S177.039	Transpower New Zealand Limited	FS23.782	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S177.039	Transpower New Zealand Limited	FS47.237	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose in part	For the reasons explained above, Meridian considers the permitted activity area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP. This would necessitate a consequential change to the threshold area specified in Rule WH.R18;	Disallow in part	Allow S177.039 only to the extent consistent with Meridian's requested relief on Rule WH.R17 and amend the area limit to match the area limit of Rule WH.R17 (being the area limit of operative Rule R104), particular for regionally significant infrastructure.	Accept in part
S177.040	Transpower New Zealand Limited			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Oppose		Subject to Transpower's relief being granted on rule WH.R17 (submission point 44) submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes	Reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		Accept in part

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								of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.			
S177.040	Transpower New Zealand Limited	FS25.026	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	Request represents good planning practice and has legal merit	Allow	Relocate rule to be part of the Part 1 Schedule 1 Process, and not the FPP	Accept in part
S177.040	Transpower New Zealand Limited	FS23.783	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S177.064	Transpower New Zealand Limited			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.	Oppose		Notwithstanding concerns raised in this submission regarding the mapping of 'highest erosion risk land (woody vegetation)', submitter seeks amendment to R17.Acknowledging operative definition of Vegetation Clearance applies to rule, considers several amendments are necessary to the rule.Regular vegetation clearance to prevent vegetation from encroaching on National Grid transmission lines and structures (beyond that provided in Electricity (Hazards from Trees) Regulations 2003) is a necessary part of maintaining safe and efficient operations of electricity transmission network. Providing for vegetation clearance underneath or near National Grid transmission lines or structures as a permitted activity is necessary in order to give effect to policy 5 of NPSET, which requires that the reasonable operational and maintenance requirements of the National Grid are provided for, and policy 10 of NPSET, which requires operation and maintenance of electricity transmission network is not compromised.Seeks to add a subclause to clause (a) to clarify that vegetation clearance of less than 200m2 per property per year is permitted activity (on the basis that clearance of more than 200m2 is a controlled activity under rule P.R17). Considers it necessary to avoid clearance of less than 200m2 becoming an innominate activity (and therefore discretionary). Clarification is sought as to how the 200m2 is calculated – is it the identified woody vegetation or on a site which contains an area of woody vegetation.Opposes rule being included within freshwater planning instrument, as the purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Amend rule as follows: Rule P.R16: Vegetation clearance on highest erosion risk land Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) for no more than a total area of 200m2 per property in any consecutive 12-month period, or (ii) to implement an action in the erosion risk treatment plan for the farm, or (iii) for the control of pest plants, and or (iv) for the purposes of operating or maintaining the National Grid, and (b) debris from the vegetation clearance is not placed where it can enter a surface water body. In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		Accept in part
S177.064	Transpower New Zealand Limited	FS23.807	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S177.064	Transpower New Zealand Limited	FS47.366	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land – permitted activity.		Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow in part	Allow S177.064 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Accept in part
S177.065	Transpower New Zealand Limited			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Subject to Transpower's relief being granted on rule P.R16 (providing for vegetation clearance for the purposes of operating or maintaining the National Grid as a permitted activity) submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Considers the rehabilitation of areas of cleared vegetation (under matter of control 3) should not be undertaken in a manner or in locations where vegetation would encroach on National Grid lines or structures. Considers that an additional matter of control is necessary to address this matter. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Amend rule as follows: Rule P.R17: Vegetation clearance on highest erosion risk land Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200 m2 per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body, is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this rule. Matters of control 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 not exceed that which occurred from the land prior to the vegetation clearance occurring 2. The area, location and method of vegetation clearance 3. Stabilisation and rehabilitation of the area cleared 4. 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 5. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan 6. The time and circumstances under which the resource consent conditions may be reviewed 7. The need for any rehabilitated areas of vegetation to be clear of National Grid transmission lines and support structures In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		Accept in part
S177.065	Transpower New Zealand Limited	FS23.808	Forest & Bird	8 Whaitua Te	Rule P.R17: Vegetation clearance on highest		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	erosion risk land – controlled activity.			with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	
S177.065	Transpower New Zealand Limited	FS47.375	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose in part	For the reasons explained above, Meridian considers the permitted activity area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP. This would necessitate a consequential change to the threshold area specified in Rule P.R17;	Disallow in part	Allow S177.065 only to the extent consistent with Meridian's requested relief on Rule P.R16 and amend the area limit to match the area limit of Rule P.R16 (being the area limit of operative Rule R104), particular for regionally significant infrastructure.	Accept in part
S177.066	Transpower New Zealand Limited			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Oppose		Subject to Transpower's relief being granted on rule WH.R17 submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		Accept in part
S177.066	Transpower New Zealand Limited	FS23.809	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S177.076	Transpower New Zealand Limited			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose		Opposes schedule being included within freshwater planning instrument, as purpose of the schedule is to manage land use for the purposes of soil conservation. Seeks schedule be reallocated to the Part 1 Schedule 1 planning instrument.	Reallocate the schedule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		Reject
S177.076	Transpower New Zealand Limited	FS23.819	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S177.077	Transpower New Zealand Limited			2 Interpretation	B Management objectives	Amend		Providing for revegetation of land below or near National Grid transmission lines or structures could compromise safe operation of National Grid, and considers this should be acknowledged in objective (d) in order to give effect to Policy 10 of NPSET.	Amend schedule as follows: B Management objectives The Erosion and Sediment Management Plan must demonstrate that the measures adopted to address the identified risks will: (a) minimise sediment loss from the vegetation clearance by adopting, as a minimum, good management practice, and (b) avoid an increase in risk of loss of sediment to water relative to the risk of loss that exists from the land in a		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									natural state, and (c) minimise the discharge of water and sediment resulting from the vegetation clearance into a surface water body, and (d) provide for the land to be restored and revegetated with appropriate species (except below or near National Grid transmission lines and structures, where revegetation is not appropriate).		
S177.077	Transpower New Zealand Limited	FS23.820	Forest & Bird	2 Interpretation	B Management objectives		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S177.078	Transpower New Zealand Limited			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Amend		As per submission on management objectives, considers clause (c)(v) of section C1 be amended to recognise it is inappropriate to undertake revegetation on land located underneath or near National Grid transmission lines or support structures. Considers terms "critical source areas" and "hotspots for sediment loss to surface water" under clause (b)(ix) are unclear, and should be defined so that it is clear to plan users what these terms mean, and what is sought to be mapped under this clause.	Amend schedule as follows: C Requirements of the Erosion and Sediment Management Plan C1 Contents of the Erosion and Sediment Management Plan The Erosion and Sediment Management Plan shall contain as a minimum: (a) The following details that describe the land where the vegetation clearance is proposed: (i) The full name, postal and physical address and contact details (including email addresses and telephone numbers) of the person responsible for vegetation clearance on the land, including the name of and contact details for the managers or contractors, and (ii) The property location identifier, the cadastral and map references and GIS polygon reference, and (iii) The legal description and ownership of each parcel of land if different from the person responsible for vegetation clearance on the land, and (iv) The full name, postal and physical address and contact details (including email addresses and telephone numbers), qualifications and relevant experience of the person responsible for preparing the Erosion and Sediment Management Plan. Maps (b) The Erosion and Sediment Management Plan must include maps at a scale not less than 1:10000 that include and show: (i) the computer freehold register, the date, and a north arrow, and (ii) the vegetation clearance and operational area boundaries, and (iii) the public road(s) used for access, entry points to the land and rural		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									number(s) of entry point(s), and (iv) the external property boundaries within 200 m of the vegetation clearance areas, and (v) the catchment and sub-catchment that the vegetation clearance area is within and a map showing the location of the vegetation clearance area within the catchment and sub- catchment, and (vi) the location (and for named waterbodies, the names) of waterbodies on the property, including permanently or intermittently flowing including rivers, streams, drains; wetlands, lakes and springs, and specifically identifying any waterbodies where vegetation clearance activities are subject to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 or rules in the Plan, and (vii) the location of any site or river included in Schedules B, C, F1 and F3 of this Plan that is within, or adjacent to, the vegetation clearance area, and (viii) a 1m digital elevation model overlay of the terrain of the vegetation clearance area, and (ix) the location of land with highest erosion risk land (woody vegetation), any other critical source areas, and hotspots for sediment loss to surface water, and (x) location of the proposed vegetation clearance operations including earthworks, land preparation, roads and formed tracks and access ways, water body entry or crossing, harvesting methods, skid and landing sites. Operating systems and practices (c) A description of the planned vegetation clearance operations and management practices. This shall be in sufficient detail to reflect the scale of any environmental risk and the measures in place, or to be undertaken, that will mitigate the risk of sediment loss from the land as a result of vegetation clearance activity. At a minimum, this shall include a description of management practices to be used, including specific practices identified in relevant guidelines for: (i) Planning and design for construction, maintenance and rehabilitation of roads, tracks, skid sites and landings; clearing and stripping of land; bulk earthworks; and fill placement and compaction, and (ii) Erosion and sediment control measures, including structures and vegetation to manage erosion and minimise sediment loss, and (iii) Vegetation clearance techniques and practices with particular regard for highest erosion risk land (woody vegetation), and		

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									(iv) Managing debris and slash, and (v) Rehabilitation and revegetation of highest erosion risk land (woody vegetation), except where the land is located underneath or near National Grid transmission lines or structures, and (vi) Recording and monitoring of management practices and performance of mitigation measures, and (vii) Monitoring of effects of activities on land stability and water quality, (viii) Other practices necessary to assess and mitigate the risk of sediment loss. (d) The Erosion and Sediment Management Plan shall set out the time period over which the good management practices and mitigation measures will be implemented and the methods by which their implementation will be recorded and performance and effects monitored.		
S177.078	Transpower New Zealand Limited	FS23.821	Forest & Bird	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S177.084	Transpower New Zealand Limited			13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Amend		Notes mapping of “Highest erosion risk land (Woody vegetation)” includes small areas of identified land that are incohesive. Questions value of regulating small, incohesive areas of woody vegetation, given controlled activity threshold for vegetation clearance is 200m2. Considers maps should be amended to only identify cohesive areas of woody vegetation, and remove incohesive or isolated areas. Isolated areas smaller than 200m2 should be removed from the maps to be consistent with rules.	Amend Map 91, and the associated GIS map layer, to only identify cohesive areas of “Highest erosion risk land (Woody vegetation)”.		Accept in part
S177.084	Transpower New Zealand Limited	FS23.827	Forest & Bird	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S177.085	Transpower New Zealand Limited			13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.	Amend		Notes mapping of “Highest erosion risk land (Woody vegetation)” includes small areas of identified land that are incohesive. Questions value of regulating small, incohesive areas of woody vegetation, given controlled activity threshold for vegetation clearance is 200m2. Considers maps should be amended to only identify cohesive areas of woody vegetation, and remove incohesive or isolated areas. Isolated areas smaller than 200m2 should be removed from the maps to be consistent with rules.	Amend Map 94, and the associated GIS map layer, to only identify cohesive areas of “Highest erosion risk land (Woody vegetation)”.		Accept in part
S177.085	Transpower New Zealand Limited	FS23.828	Forest & Bird	13 Maps	Map 94: Highest erosion risk land (Woody vegetation)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought unless otherwise	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					clearance) – Te Whanganui-a-Tara.			with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		stated or where points are consistent with Forest & Bird's submission points and specific relief.	
S18.001	PF Olsen Ltd			2 Interpretation	Afforestation	Support		Supports consistency with higher order documents i.e. NES-CF	Retain as notified		Accept in part
S18.003	PF Olsen Ltd			General comments	Harvesting	Support		Supports consistency with higher order documents i.e. NES-CF	Retain as notified		Accept in part
S18.004	PF Olsen Ltd			General comments	Highest erosion risk land (plantation forestry)	Oppose		Considers that there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.		Accept in part
S18.004	PF Olsen Ltd	FS50.124	New Zealand Carbon Farming Group ('NZCF')	General comments	Highest erosion risk land (plantation forestry)		Support	NZCF supports the submission and acknowledges that there is more research available to support the definition. However, NZCF supports the definition being aligned with the definition in the NESPF or subsequent NESCF.	Allow	Not stated	Accept in part
S18.006	PF Olsen Ltd			General comments	Highest erosion risk land (woody vegetation)	Oppose		Seeks more comprehensive information regarding the highest erosion risk for woody vegetation. Considers that the supporting technical report accompanying the mapping system is inadequate to substantiate any provisions in PC1.	Delete this definition		Accept
S18.007	PF Olsen Ltd			General comments	Mechanical land preparation	Support		Supports consistency with higher order documents i.e. NES-CF	Retain as notified		Accept in part
S18.008	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Replanting	Support		Supports consistency with higher order documents i.e. NES-CF	Retain as notified		Accept in part
S18.010	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Support		Supports consistency with higher order documents i.e. NES-CF	Retain as notified		Accept in part
S18.028	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers the prohibition of forestry activities in high erosion areas is too restrictive, resulting in economic burden and triggering liabilities under the ETS. Seeks greater alignment with the NES-CF and a more scientific approach in formulating forestry regulations. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity. Considers there is preferential leniency towards farming practices over forestry activities which contradicts scientific evidence and obstructs the growth of both sectors. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Seeks a more detailed analysis of the economic impact of the proposed retirement rules on the forestry sector. Notes section 85(1) of the Resource Management Act (RMA) prohibits provisions that deem land unusable or injuriously affected without justification	Delete policy		Accept in part
S18.028	PF Olsen Ltd	FS50.125	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission.	Allow	Not stated	Accept in part
S18.032	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF standards for vegetation clearance.		Reject
S18.032	PF Olsen Ltd	FS25.059	Guildford Timber Company Limited, Silverstream	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP	Allow	Amend Rule WH.R17 to default to the NES-CF standards for vegetation clearance	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Forest Limited and the Goodwin Estate Trust.					are not considered necessary to implement the NPS-FM or to achieve the purpose of the RMA		associated with commercial forestry	
S18.033	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF standards for vegetation clearance.		Reject
S18.034	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme and is concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that 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. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	Amend to recognise permitted activity status from the NES-CF.		Accept in part
S18.034	PF Olsen Ltd	FS50.126	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	Allow	Not stated	Accept in part
S18.035	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Amend		Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme and is concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that 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. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	Amend activity status to controlled, with criteria that can be met by landowners.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S18.035	PF Olsen Ltd	FS50.127	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	Allow	Not stated	Reject
S18.036	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Oppose		Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme and is concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that 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. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	Delete the provision		Accept
S18.036	PF Olsen Ltd	FS50.128	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	Allow	Not stated	Accept
S18.054	PF Olsen Ltd			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers the prohibition of forestry activities in high erosion areas is too restrictive, resulting in economic burden and triggering liabilities under the ETS. Seeks greater alignment with the NES-CF and a more scientific approach in formulating forestry regulations. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity. Considers there is preferential leniency towards farming practices over forestry activities which contradicts scientific evidence and obstructs the growth of both sectors. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Seeks a more detailed analysis of the economic impact of the proposed retirement rules on the forestry sector. Notes section 85(1) of the Resource Management Act (RMA) prohibits provisions that deem land unusable or injuriously affected without justification	Delete the policy		Accept in part
S18.054	PF Olsen Ltd	FS50.129	New Zealand Carbon Farming Group ('NZCF')	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission.	Allow	Not stated	Accept in part
S18.058	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.	Amend		Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF standards for vegetation clearance.		Reject
S18.059	PF Olsen Ltd			8 Whaitua Te	Rule P.R17: Vegetation clearance on highest	Amend		Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach.	Amend this rule to default to the NES-CF standards for vegetation clearance.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	erosion risk land – controlled activity.			Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.			
S18.060	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Amend		Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF for vegetation clearance rules.		Reject
S18.061	PF Olsen Ltd			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Amend		Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. Considers that the assessment methodology undertaken 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. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	Amend to recognise permitted activity status from the NES-CF.		Accept in part
S18.061	PF Olsen Ltd	FS50.130	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	Allow	Not stated	Accept in part
S18.062	PF Olsen Ltd			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Amend		Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. Considers that the assessment methodology undertaken 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. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	Amend activity status to restricted discretionary, with criteria that can be met by landowners.		Reject
S18.062	PF Olsen Ltd	FS50.131	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	Allow	Not stated	Reject
S18.063	PF Olsen Ltd			9 Te Awarua-o-	Rule P.R21: Plantation Forestry on highest erosion	Oppose		Concerned PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. Considers that	Delete the provision		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	risk land – prohibited activity.			the assessment methodology undertaken 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. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.			
S18.063	PF Olsen Ltd	FS50.132	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	Allow	Not stated	Accept
S18.070	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose		Considers an erosion and sediment management plan is redundant for forestry activities, as these are already managed under the NES-CF.	Delete this provision and default to the NES-CF		Accept
S18.071	PF Olsen Ltd			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose		Considers an erosion and sediment management plan is redundant for forestry activities, as these are already managed under the NES-CF.	Delete this schedule. Refer to NES-CF management plans.		Accept
S18.071	PF Olsen Ltd	FS50.133	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	NZCF supports the submission and considers that commercial forestry is best managed by the NESCF as a higher order planning instrument.	Allow	Not stated	Accept
S18.074	PF Olsen Ltd			13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Oppose		Considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.		Accept in part
S18.076	PF Olsen Ltd			13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.	Oppose		Considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.		Accept in part
S18.076	PF Olsen Ltd	FS47.454	Meridian Energy Limited	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.		Support in part	Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;	Allow in part	Allow S18.076	Accept in part
S18.077	PF Olsen Ltd			13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Oppose		Considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.		Accept in part
S18.077	PF Olsen Ltd	FS50.134	New Zealand Carbon Farming Group ('NZCF')	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S183.005	Yvonne Weeber			2 Interpretation	Afforestation	Support		Not stated	Not stated		No recommendation
S183.005	Yvonne Weeber	FS27.005	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	Afforestation		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.016	Yvonne Weeber			2 Interpretation	Erosion and sediment management plan	Support		Not stated	Not stated		No recommendation
S183.016	Yvonne Weeber	FS27.016	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	Erosion and sediment management plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.020	Yvonne Weeber			General comments	Harvesting	Support		Not stated	Not stated		No recommendation
S183.020	Yvonne Weeber	FS27.020	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	General comments	Harvesting		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.022	Yvonne Weeber			General comments	Highest erosion risk land (plantation forestry)	Support		Not stated	Not stated		No recommendation
S183.022	Yvonne Weeber	FS27.022	Manor Park and Haywards Residents Community	General comments	Highest erosion risk land (plantation forestry)		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Incorporate ("MPHRCI")					retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.025	Yvonne Weeber			General comments	Highest erosion risk land (woody vegetation)	Support		Not stated	Not stated		No recommendation
S183.025	Yvonne Weeber	FS27.025	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	General comments	Highest erosion risk land (woody vegetation)		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.030	Yvonne Weeber			General comments	Mechanical land preparation	Support		Not stated	Not stated		No recommendation
S183.030	Yvonne Weeber	FS27.030	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	General comments	Mechanical land preparation		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.038	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser	Support		Not stated	Not stated		No recommendation
S183.038	Yvonne Weeber	FS27.038	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.039	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Replanting	Support		Not stated	Not stated		No recommendation
S183.039	Yvonne Weeber	FS27.039	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Replanting		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.051	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Support		Not stated	Not stated		No recommendation
S183.051	Yvonne Weeber	FS27.051	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.150	Yvonne Weeber			9 Te Awarua-o-Porirua Whaitua	Rule R104: Vegetation clearance on erosion prone land – permitted activity.	Neutral		Not stated	Not stated		No recommendation
S183.150	Yvonne Weeber	FS27.150	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule R104: Vegetation clearance on erosion prone land – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.151	Yvonne Weeber			9 Te Awarua-o-Porirua Whaitua	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.	Neutral		Not stated	Not stated		No recommendation
S183.151	Yvonne Weeber	FS27.151	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	9 Te Awarua-o-Porirua Whaitua	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.152	Yvonne Weeber			9 Te Awarua-o-Porirua Whaitua	Rule R106: Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity.	Neutral		Not stated	Not stated		No recommendation
S183.152	Yvonne Weeber	FS27.152	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule R106: Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.153	Yvonne Weeber			9 Te Awarua-o-Porirua Whaitua	Rule R107: Earthworks and vegetation clearance – discretionary activity.	Neutral		Not stated	Not stated		No recommendation
S183.153	Yvonne Weeber	FS27.153	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule R107: Earthworks and vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.218	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Support		Not stated	Not stated		No recommendation
S183.218	Yvonne Weeber	FS27.218	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.240	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.		Reject
S183.240	Yvonne Weeber	FS27.240	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S183.241	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.		Accept in part
S183.241	Yvonne Weeber	FS27.241	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.242	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.		Reject
S183.242	Yvonne Weeber	FS27.242	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.243	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Not Stated		Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.		No recommendation
S183.243	Yvonne Weeber	FS27.243	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.243	Yvonne Weeber	FS50.184	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1.	Disallow	Not stated	No recommendation
S183.244	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Not Stated		Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.		No recommendation
S183.244	Yvonne Weeber	FS27.244	Manor Park and Haywards Residents	8 Whaitua Te	Rule WH.R21: Plantation forestry – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Community Incorporate ("MPHRCI")	Whanganui-a-Tara				and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.244	Yvonne Weeber	FS50.185	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1.	Disallow	Not stated	No recommendation
S183.245	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Not Stated		Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.		No recommendation
S183.245	Yvonne Weeber	FS27.245	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								“planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.245	Yvonne Weeber	FS50.186	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1. In addition, the Rule is for a prohibited activity in any case.	Disallow	Not stated	No recommendation
S183.301	Yvonne Weeber			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Support		Not stated	Not stated		No recommendation
S183.301	Yvonne Weeber	FS27.301	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly,	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.322	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated		No recommendation
S183.322	Yvonne Weeber	FS27.322	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.323	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated		Accept in part
S183.323	Yvonne Weeber	FS27.323	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and	Allow	Not stated	Accept in part

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								ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.324	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated		Reject
S183.324	Yvonne Weeber	FS27.324	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.325	Yvonne Weeber			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated		No recommendation
S183.325	Yvonne Weeber	FS27.325	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.325	Yvonne Weeber	FS50.187	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1.	Disallow	Not stated	No recommendation
S183.326	Yvonne Weeber			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated		No recommendation
S183.326	Yvonne Weeber	FS27.326	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.326	Yvonne Weeber	FS50.188	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1.	Disallow	Not stated	No recommendation
S183.327	Yvonne Weeber			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Amend		Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated		No recommendation
S183.327	Yvonne Weeber	FS27.327	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.327	Yvonne Weeber	FS50.189	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1. In addition, the Rule is for a prohibited activity in any case.	Disallow	Not stated	No recommendation
S183.377	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Support		Not stated	Not stated		No recommendation
S183.377	Yvonne Weeber	FS27.377	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.378	Yvonne Weeber			##	A Purposes of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S183.378	Yvonne Weeber	FS27.378	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	##	A Purposes of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.379	Yvonne Weeber			2 Interpretation	B Management objectives	Support		Not stated	Not stated		No recommendation
S183.379	Yvonne Weeber	FS27.379	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	B Management objectives		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.380	Yvonne Weeber			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S183.380	Yvonne Weeber	FS27.380	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S183.381	Yvonne Weeber			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S183.381	Yvonne Weeber	FS27.381	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.382	Yvonne Weeber			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S183.382	Yvonne Weeber	FS27.382	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.383	Yvonne Weeber			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Support		Not stated	Not stated		No recommendation
S183.383	Yvonne Weeber	FS27.383	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.384	Yvonne Weeber			##	A Purpose of the Erosion and	Support		Not stated	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					Sediment Management Plan						
S183.384	Yvonne Weeber	FS27.384	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	##	A Purpose of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.385	Yvonne Weeber			2 Interpretation	B Management objectives	Support		Not stated	Not stated		No recommendation
S183.385	Yvonne Weeber	FS27.385	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	B Management objectives		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								urban area". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.386	Yvonne Weeber			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S183.386	Yvonne Weeber	FS27.386	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.387	Yvonne Weeber			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S183.387	Yvonne Weeber	FS27.387	Manor Park and Haywards Residents	2 Interpretation	C1 Contents of the Erosion and		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Community Incorporate ("MPHRCI")		Sediment Management Plan			and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.388	Yvonne Weeber			2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S183.388	Yvonne Weeber	FS27.388	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.389	Yvonne Weeber			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S183.389	Yvonne Weeber	FS27.389	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.417	Yvonne Weeber			13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Support		Not stated	Not stated		No recommendation
S183.417	Yvonne Weeber	FS27.417	Manor Park and Haywards Residents Community	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Incorporate ("MPHRCI")					retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.418	Yvonne Weeber			13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	Support		Not stated	Not stated		No recommendation
S183.418	Yvonne Weeber	FS27.418	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.420	Yvonne Weeber			13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.	Support		Not stated	Not stated		No recommendation
S183.420	Yvonne Weeber	FS27.420	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S183.421	Yvonne Weeber			13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Support		Not stated	Not stated		No recommendation
S183.421	Yvonne Weeber	FS27.421	Manor Park and Haywards Residents Community	13 Maps	Map 95: Highest erosion risk land (Plantation forestry)		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Incorporate ("MPHRCI")		– Te Whanganui-a-Tara.			Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S184.001	David Bennett & Jenni LeanDavid and Jenni Bennett and Lean			2 Interpretation	General comments - overall	Not Stated		Supports the submissions of the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Association.	Not stated		No recommendation
S184.002	David Bennett & Jenni LeanDavid and Jenni Bennett and Lean			2 Interpretation	General comments - economic cost/impact	Oppose		Concerns that forestry rules under PC1 would render submitters forestry land uneconomic and incapable of reasonable use under section 85 of the RMA.	Not stated		No recommendation
S186.010	Guardians of the Bays Inc			2 Interpretation	Erosion and sediment management plan	Support		Not stated	Not stated		No recommendation
S186.010	Guardians of the Bays Inc	FS27.433	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	Erosion and sediment management plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S186.173	Guardians of the Bays Inc			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Support		Not stated	Not stated		No recommendation
S186.173	Guardians of the Bays Inc	FS27.596	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								discharges to water from activities on this site, is appropriate.			
S186.174	Guardians of the Bays Inc			##	A Purposes of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S186.174	Guardians of the Bays Inc	FS27.597	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	##	A Purposes of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S186.175	Guardians of the Bays Inc			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S186.175	Guardians of the Bays Inc	FS27.598	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S186.176	Guardians of the Bays Inc			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S186.176	Guardians of the Bays Inc	FS27.599	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S186.177	Guardians of the Bays Inc			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S186.177	Guardians of the Bays Inc	FS27.600	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S186.178	Guardians of the Bays Inc			##	A Purposes of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S186.178	Guardians of the Bays Inc	FS27.601	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	##	A Purposes of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S186.179	Guardians of the Bays Inc			2 Interpretation	B Management objectives	Support		Not stated	Not stated		No recommendation
S186.179	Guardians of the Bays Inc	FS27.602	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	B Management objectives		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S186.180	Guardians of the Bays Inc			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S186.180	Guardians of the Bays Inc	FS27.603	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S186.181	Guardians of the Bays Inc			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S186.181	Guardians of the Bays Inc	FS27.604	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								urban area". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S186.182	Guardians of the Bays Inc			2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S186.182	Guardians of the Bays Inc	FS27.605	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S186.183	Guardians of the Bays Inc			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Support		Not stated	Not stated		No recommendation
S186.183	Guardians of the Bays Inc	FS27.606	Manor Park and Haywards Residents	2 Interpretation	D Amendment of Erosion and		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Community Incorporate ("MPHRCI")		Sediment Management Plan			and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S188.063	Wellington Fish and Game Regional Council			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Support		Not stated	Not stated		No recommendation
S188.063	Wellington Fish and Game Regional Council	FS9.063	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Not stated	Disallow	Not stated	No recommendation
S188.063	Wellington Fish and Game Regional Council	FS21.068	Manor Park Golf Club (Incorporated) (MPGC)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	In keeping with the sanctuary environment status that the MPGC has established and is looking to maintain.	Allow	Not stated	No recommendation
S188.063	Wellington Fish and Game Regional Council	FS23.1219	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought be unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	No recommendation
S188.063	Wellington Fish and Game Regional Council	FS27.1152	Manor Park and Haywards Residents Community	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Incorporate ("MPHRCI")					retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S191.001	Juken New Zealand			2 Interpretation	General comments - overall	Not Stated		Concerns about: The extension of controls beyond the recommendations of the Waitua committee WIP reports. No consideration for ETS implications with the removal of land from production. Inadequate Section 32 analysis Deficient application of NES-CF Regulation 6 for enforcing more stringent rules. Impracticalities of the erosion mapping and definition of high erosion.	Not stated		No recommendation
S191.001	Juken New Zealand	FS50.084	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	Allow	Not stated	No recommendation
S191.002	Juken New Zealand			2 Interpretation	General comments - overall	Not Stated		Supports the submissions of China National Forestry group, John Turkington Ltd and Forest Enterprises Ltd.	Not stated		No recommendation
S191.003	Juken New Zealand			2 Interpretation	General comments - current legislation	Not Stated		Notes the NES-PF and NES-CF are part of the government's suite of regulations that help meet the objectives of the NPS-FM. Is 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. Refers to regulation 6 of the NES-CF which allows for a council to provide more stringent rules to meet an objective giving effect to the NPS-FM but notes there is a process to be undertaken by the council to justify any application of stringency, and refers to Section 32 (4) of the RMA. 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). Considers the Section 32 report: Part A - Background and Context (para 88) does not provide any evidence that the enforcing of more stringent	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rules will deliver better outcomes than the NES-CF. Notes that neither of the two Whaitua committees recommended that the NES – PF was insufficient to meet fresh water targets.			
S191.003	Juken New Zealand	FS50.085	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	Allow	Not stated	No recommendation
S191.004	Juken New Zealand			General comments	General comments - plantation forestry	Not Stated		Considers the definition of erosion risk on forestry land in the Erosion Risk Mapping for Te-Awarua-o-Porirua and Te-Whanganui-a-Tara report is flawed, as it does not resemble that erosion risk is significantly lower on land with tree cover than pasture land. 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, and that no consideration has been given to Emission Trading Scheme (ETS) implications for forestry land that has been categorised in the top 10% of the highest erosion land. Notes that land that can't be replanted will lead to liabilities under the ETS. Notes that replanting is included in the Section 32 report but was an omission in the draft plan as an oversight by the GWRC. Considers this should have been rectified by updating the draft plan rather than waiting on submissions as submitters maybe unaware of the replanting omission. Concerns that the pixelated quality of maps 92 and 95 will result in more land then necessary written off.	Not stated		No recommendation
S191.004	Juken New Zealand	FS50.086	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	Allow	Not stated	No recommendation
S193.012	Wairarapa Federated Farmers			General comments	General comments - plantation forestry	Amend		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. Considers the policy an example of managed retreat' for the public good, with all the cost borne by the landowner. Identifies 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 the Emissions Trading Scheme (ETS) eligibility criteria to avoid plantings being ineligible for New Zealand Units (NZUs). Considers the conversion of exotic forest to permanent forest presents several difficulties about the ETS as outlined below: Uncertainty around how the ETS treats the transition of registered exotic forests to native forest species, Uncertainty around how averaging accounting would address a new planting rotation occurring on a very different basis to when the forested area was originally registered in the ETS Uncertainty around the sequestration rates of native species (this work is still in its infancy and may need 5-6 more years to produce anything of any use) Uncertainty around the possibility of needing to first de-register the exotic forest (and paying back all the NZUs earned from it) before registering the native forest as a new forest. Request this policy be amended to enable the replanting of production forests so long as landowners can identify (through a	Amend policy 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. Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								consent application) how the management and harvest of the forest will be achieved without adverse effects on sediment in water bodies.			
S193.012	Wairarapa Federated Farmers	FS23.968	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.012	Wairarapa Federated Farmers	FS50.150	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	Subject to NZCF's primary submission, NZCF supports the submission and similarly considers that replanting should be permitted subject to appropriate management measures to avoid or mitigate adverse effects. NZCF considers that this can be achieved under the NESCF.	Allow	Not stated	Accept
S193.022	Wairarapa Federated Farmers			General comments	Highest erosion risk land (plantation forestry)	Oppose		Considers the methodology is not fit for purpose	Delete definition Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.022	Wairarapa Federated Farmers	FS23.978	Forest & Bird	General comments	Highest erosion risk land (plantation forestry)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.025	Wairarapa Federated Farmers			General comments	Highest erosion risk land (woody vegetation)	Not Stated		Considers the methodology is not fit for purpose	Delete definition Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.025	Wairarapa Federated Farmers	FS23.981	Forest & Bird	General comments	Highest erosion risk land (woody vegetation)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.025	Wairarapa Federated Farmers	FS47.122	Meridian Energy Limited	General comments	Highest erosion risk land (woody vegetation)		Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;	Allow	Allow S193.025.	Accept
S193.028	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Oppose		Considers the operative definition agreed upon during the pNRP Environment Court mediation should be retained	Retain operative definition Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
S193.028	Wairarapa Federated Farmers	FS23.984	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S193.042	Wairarapa Federated Farmers			9 Te Awarua-o-	Rule R104: Vegetation clearance on erosion	Oppose		Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s)		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	prone land – permitted activity.				necessary to give effect to the relief sought.		
S193.042	Wairarapa Federated Farmers	FS23.998	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule R104: Vegetation clearance on erosion prone land – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.042	Wairarapa Federated Farmers	FS47.149	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule R104: Vegetation clearance on erosion prone land – permitted activity.		Support	Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian's submission points are accepted, agrees Rule R104 should remain for all Whaitua;	Allow	Allow S193.042 and retain Rule R104 for all Whaitua.	Accept in part
S193.043	Wairarapa Federated Farmers			9 Te Awarua-o-Porirua Whaitua	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.	Oppose		Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
S193.043	Wairarapa Federated Farmers	FS23.999	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.043	Wairarapa Federated Farmers	FS47.150	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.		Support	Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian's submission points are accepted, agrees Rule R105 should remain for all Whaitua;	Allow	Allow S193.043 and retain Rule R105 for all Whaitua.	Accept in part
S193.044	Wairarapa Federated Farmers			9 Te Awarua-o-Porirua Whaitua	Rule R107: Earthworks and vegetation clearance – discretionary activity.	Oppose		Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
S193.044	Wairarapa Federated Farmers	FS23.1000	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule R107: Earthworks and vegetation clearance – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.044	Wairarapa Federated Farmers	FS47.153	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule R107: Earthworks and vegetation clearance – discretionary activity.		Support	Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian's submission points are accepted, agrees Rule R107 should remain for all Whaitua;	Allow	Allow S193.044 and retain Rule R107 for all Whaitua.	Accept in part
S193.088	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers this is addressed by existing national and regional regulation	Delete P28 Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S193.088	Wairarapa Federated Farmers	FS23.1044	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S193.088	Wairarapa Federated Farmers	FS50.151	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S193.094	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Amend to be consistent with relief sought for national Freshwater Farm Plans	Delete R17 Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.094	Wairarapa Federated Farmers	FS23.1050	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.094	Wairarapa Federated Farmers	FS47.229	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow in part	Allow S193.094 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Accept
S193.095	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Retain operative NRP rule	Delete R18Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.095	Wairarapa Federated Farmers	FS23.1051	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.095	Wairarapa Federated Farmers	FS47.238	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support in part	For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate amendment of the threshold area specified in Rule WH.R18;	Allow in part	Allow S193.095 by amending Rule WH.R17 to match the limits in operative NRP Rule R104 and make consequential amendments to Rule WH.R18.	Accept
S193.096	Wairarapa Federated Farmers			8 Whaitua Te	Rule WH.R19: Vegetation	Oppose		Retain operative NRP rule	Delete R19 Make any consequential amendment(s)		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	clearance – discretionary activity.				necessary to give effect to the relief sought.		
S193.096	Wairarapa Federated Farmers	FS23.1052	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.096	Wairarapa Federated Farmers	FS47.246	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Allow	Allow S193.096.	Accept
S193.097	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Retain operative NRP rule	Delete R20	Make any consequential amendment(s) necessary to give effect to the relief sought.	Reject
S193.097	Wairarapa Federated Farmers	FS23.1053	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S193.097	Wairarapa Federated Farmers	FS50.152	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow in part	Not stated	Reject
S193.098	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Oppose		Retain operative NRP rule	Delete R21	Make any consequential amendment(s) necessary to give effect to the relief sought.	Accept
S193.098	Wairarapa Federated Farmers	FS23.1054	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.098	Wairarapa Federated Farmers	FS50.153	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow in part	Not stated	Accept
S193.099	Wairarapa Federated Farmers			8 Whaitua Te	Rule WH.R22: Plantation forestry on highest erosion	Oppose		Retain operative NRP rule	Delete R22	Make any consequential amendment(s)	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	risk land – prohibited activity.				necessary to give effect to the relief sought.		
S193.099	Wairarapa Federated Farmers	FS23.1055	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.099	Wairarapa Federated Farmers	FS50.154	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow in part	Not stated	Accept
S193.137	Wairarapa Federated Farmers			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers this is addressed by existing national and regional regulation	Delete P26 Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
S193.137	Wairarapa Federated Farmers	FS23.1093	Forest & Bird	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S193.137	Wairarapa Federated Farmers	FS50.155	New Zealand Carbon Farming Group ('NZCF')	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S193.143	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.	Amend		Amend to be consistent with relief sought for national freshwater farm plans	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.143	Wairarapa Federated Farmers	FS23.1099	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.143	Wairarapa Federated Farmers	FS47.367	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally	Allow in part	Allow S193.143 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								significant infrastructure consistent with the limits in Rule R104;		consistent with operative Rule R104.	
S193.144	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.144	Wairarapa Federated Farmers	FS23.1100	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.144	Wairarapa Federated Farmers	FS47.376	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support in part	For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate amendment of the threshold area specified in Rule P.R17;	Allow in part	Allow S193.144 by amending Rule P.R16 to match the limits in operative NRP Rule R104 and make consequential amendments to Rule P.R17.	Accept in part
S193.145	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Oppose		Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.145	Wairarapa Federated Farmers	FS23.1101	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.145	Wairarapa Federated Farmers	FS47.385	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Allow	Allow S193.145.	Accept
S193.146	Wairarapa Federated Farmers			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
S193.146	Wairarapa Federated Farmers	FS23.1102	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S193.146	Wairarapa Federated Farmers	FS50.156	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow in part	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S193.147	Wairarapa Federated Farmers			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Oppose		Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.147	Wairarapa Federated Farmers	FS23.1103	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.147	Wairarapa Federated Farmers	FS50.157	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow in part	Not stated	Accept
S193.148	Wairarapa Federated Farmers			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Oppose		Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.148	Wairarapa Federated Farmers	FS23.1104	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.148	Wairarapa Federated Farmers	FS50.158	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow in part	Not stated	Accept
S193.170	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.170	Wairarapa Federated Farmers	FS23.1126	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.171	Wairarapa Federated Farmers			##	A Purposes of the Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s)		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									necessary to give effect to the relief sought.		
S193.171	Wairarapa Federated Farmers	FS23.1127	Forest & Bird	##	A Purposes of the Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.172	Wairarapa Federated Farmers			2 Interpretation	B Management objectives	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.172	Wairarapa Federated Farmers	FS23.1128	Forest & Bird	2 Interpretation	B Management objectives		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.173	Wairarapa Federated Farmers			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.173	Wairarapa Federated Farmers	FS23.1129	Forest & Bird	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.174	Wairarapa Federated Farmers			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.174	Wairarapa Federated Farmers	FS23.1130	Forest & Bird	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.175	Wairarapa Federated Farmers			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.175	Wairarapa Federated Farmers	FS23.1131	Forest & Bird	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										submission points and specific relief.	
S193.176	Wairarapa Federated Farmers			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.176	Wairarapa Federated Farmers	FS23.1132	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.177	Wairarapa Federated Farmers			##	A Purpose of the Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.177	Wairarapa Federated Farmers	FS23.1133	Forest & Bird	##	A Purpose of the Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.178	Wairarapa Federated Farmers			2 Interpretation	B Management objectives	Not Stated		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.178	Wairarapa Federated Farmers	FS23.1134	Forest & Bird	2 Interpretation	B Management objectives		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.179	Wairarapa Federated Farmers			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.179	Wairarapa Federated Farmers	FS23.1135	Forest & Bird	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.180	Wairarapa Federated Farmers			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.180	Wairarapa Federated Farmers	FS23.1136	Forest & Bird	2 Interpretation	C1 Contents of the Erosion and		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					Sediment Management Plan			with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	
S193.181	Wairarapa Federated Farmers			2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.181	Wairarapa Federated Farmers	FS23.1137	Forest & Bird	2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.182	Wairarapa Federated Farmers			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Oppose		References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept
S193.182	Wairarapa Federated Farmers	FS23.1138	Forest & Bird	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S193.196	Wairarapa Federated Farmers			13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Oppose		Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
S193.196	Wairarapa Federated Farmers	FS23.1152	Forest & Bird	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S193.197	Wairarapa Federated Farmers			13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	Oppose		Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
S193.197	Wairarapa Federated Farmers	FS23.1153	Forest & Bird	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S193.197	Wairarapa Federated Farmers	FS50.159	New Zealand Carbon Farming Group ('NZCF')	13 Maps	Map 92: Highest erosion risk land (Plantation forestry)		Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					– Te Awarua-o-Porirua.			and 95 are replaced with the erosion susceptibility classification in the NESPF.			
S193.199	Wairarapa Federated Farmers			13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.	Oppose		Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
S193.199	Wairarapa Federated Farmers	FS23.1155	Forest & Bird	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S193.199	Wairarapa Federated Farmers	FS47.455	Meridian Energy Limited	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Support in part	Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;	Allow in part	Allow S193.199	Accept in part
S193.200	Wairarapa Federated Farmers			13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Oppose		Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
S193.200	Wairarapa Federated Farmers	FS23.1156	Forest & Bird	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S193.200	Wairarapa Federated Farmers	FS50.160	New Zealand Carbon Farming Group ('NZCF')	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.	Allow	Not stated	Accept in part
S194.012	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Neutral		Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	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. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		Accept in part
S194.014	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Neutral		Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	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. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S194.015	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Neutral		Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	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. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		Accept in part
S194.016	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Neutral		Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	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. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		Accept in part
S194.017	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Neutral		Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	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. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		Accept in part
S194.018	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Neutral		Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	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. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		Accept in part
S194.019	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Oppose		Recognises need for restrictive controls on plantation forestry in areas identified as being at the highest risk of erosion but considers the proposed prohibited activity status is overly restrictive, and seeks a non-complying activity status instead. Considers this will ensure the activity continues to be restricted within areas where effects are anticipated to be the most significant, but will provide a pathway for such effects to be appropriately considered.	Amend activity status of WHR.22 from Prohibited to Non-Complying. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		Reject
S194.020	Urban Edge Planning Group on behalf of Mangaroa Farms Ltd			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Neutral		Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	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. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		Accept in part
S194.021	Urban Edge Planning Group on			8 Whaitua Te	Schedule 34: Plantation Forestry Erosion and	Neutral		Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly	Retention of notified provisions, or active involvement of submitter in relation to any changes that would		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	behalf of Mangaroa Farms Ltd			Whanganui-a-Tara	Sediment Management Plan.			the submitter seeks to remain involved in any process that could see these provisions altered.	result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.		
S195.001	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		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.	Not stated		No recommendation
S195.001	New Zealand Farm Forestry Association (NZFFA)	FS23.404	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.001	New Zealand Farm Forestry Association (NZFFA)	FS50.090	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and similarly acknowledges that Council monitoring does not support the approach taken in the Proposed Plan Change.	Allow	Not stated	No recommendation
S195.005	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Seeks replanting not be regulated in the proposed plan	Seeks replanting not be regulated in PC1		Reject
S195.005	New Zealand Farm Forestry Association (NZFFA)	FS25.077	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	General comments	General comments - plantation forestry		Support	The request represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and controls on replanting are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA	Allow	Remove regulating of replanting of plantation (commercial) forests	Reject
S195.005	New Zealand Farm Forestry Association (NZFFA)	FS23.408	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S195.006	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Considers the proposed rules are a major disincentive for investment in commercial forestry and are likely to negatively impact opportunities to obtain an adequate return. Notes 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. Considers PC1 will reduce the chances of meeting the Climate Change Commission advice to Government advocating increased planting of exotic forests between 2021 and 2030. Notes PC1 deters the submitter from advising planting trees as a long-term investment. Notes that under the Emissions Trading Scheme, owners are required to retain their	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								land in forests after harvest. Notes 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.			
S195.006	New Zealand Farm Forestry Association (NZFFA)	FS23.409	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.007	New Zealand Farm Forestry Association (NZFFA)			2 Interpretation	General comments - overall	Oppose		Considers the PC1 process has been rushed creating problems for those affected. Examples provided are as follows: Considers PC1 references and contains outdated definitions and regulations from the NES-PF despite this being superseded by the NES-CF regulations. Due to this, submitter considers it impossible to discern the actual meaning of the proposed new Plan. 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. Considers Council have rejected recommendations from Te Awarua-o-Porirua WIP and Te Whanganui-a-Tara WIP 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. It would be more cost effective to perform its role under the national standard.	Not stated		No recommendation
S195.007	New Zealand Farm Forestry Association (NZFFA)	FS23.410	Forest & Bird	2 Interpretation	General comments - overall		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.008	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Considers the council has not provided evidence to support claims within the S32 report forestry is responsible for the "current degraded state" of water bodies. Considers 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. 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. Considers without such evidence, there is no reason to undercut a national environmental standard.	Not stated		No recommendation
S195.008	New Zealand Farm Forestry Association (NZFFA)	FS23.411	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S195.008	New Zealand Farm Forestry Association (NZFFA)	FS50.091	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S195.009	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Consider PC1 will make it impossible for many forest owners to provide for their economic well-being or to make reasonable use of their land. Notes this applies the following situations: Notes 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. Considers small parts of a block classified as erosion prone may be essential for access or for harvest infrastructure. Concerned if they are not used, the forest might not be harvested becoming a stranded asset. Concerned it may be impossible to meet all forestry activities conditions in PC1 such as, meeting the maximum sediment level of 100 grams / m3 of runoff. Considers compliance costs may be simply too high to bother.	Not stated		No recommendation
S195.009	New Zealand Farm Forestry Association (NZFFA)	FS23.412	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.010	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		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. Considers there is no justification for the proposed new forestry rules. Considers GWRC have not provided forestry specific evidence to show the new rules will achieve improvements in terms of any particular objective developed to give effect to the NES-FM. Notes there is no defined link between the proposed more stringent rules and a particular objective. By contrast, there is plenty of evidence that plantation forestry as a land use leads to reduced sediment loads and improved water quality. Suggests that what is proposed does not comply with regulation 6.1 in the NES-CF.	Not stated		No recommendation
S195.010	New Zealand Farm Forestry Association (NZFFA)	FS23.413	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.010	New Zealand Farm Forestry Association (NZFFA)	FS50.092	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and similarly considers that there is no evidence to justify the rules, particularly with the NESCF is intended to address the effects of commercial forestry.	Allow	Not stated	No recommendation
S195.011	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Considers the S32 report with respect to plantation forestry is deficient, incorrect, misleading and devoid of evidence problems are being caused by forestry or current forestry regulations.	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								Considers the report omits mentioning that GWRC could be liable for compensation to China Forestry Group if PC1 goes ahead.			
S195.011	New Zealand Farm Forestry Association (NZFFA)	FS23.414	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.012	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - rural	Oppose		Considers the S32 reports assumption that the NES-CF is focussed on including carbon forestry in the national environmental standards and therefore the PC1 provisions are justified, is incorrect. Considers the NES-CF focuses on stronger environmental protection For example it has new requirements for Afforestation Plans to manage erosion and sedimentation and Harvest Management Plans.	Not stated		No recommendation
S195.012	New Zealand Farm Forestry Association (NZFFA)	FS23.415	Forest & Bird	General comments	General comments - rural		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.013	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Considers the s32 reports statement regarding the NES-PF erosion susceptibility classification system in comparison to the ESC mapping undertaken for Greater Wellington to be incorrect and misleading. Notes the ESC mapping undertaken for Greater Wellington defines the 'highest-risk' land as the most erodible 10% of forest land by area and land use within each Whāitua. Considers this is a relative measure, not an absolute one. Notes that just because land is in the top 10% does not imply that it is at risk of erosion. 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.	Not stated		No recommendation
S195.013	New Zealand Farm Forestry Association (NZFFA)	FS23.416	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.014	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Considers the S32 report intention to ensure plantation forestry does not establish or endure on highest erosion risk land and the most appropriate management practices are employed is laudable but inadequate. Considers it focuses on relative risk, not absolute risk. Notes if most of the land is erosion prone, then setting a target of 10% is irrelevant. Notes since the classification is by land use, 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.	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S195.014	New Zealand Farm Forestry Association (NZFFA)	FS23.417	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.015	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Notes the s32 report considers the notification process for forestry activities in the NES-PF is not fit for purpose, and there is no quality assurance or approval process provided for the notified plans. Considers there is no evidence that the plans provided under the NES-PF and now under the NES-CF are inadequate. Notes recommendations asking the Council to better enforce compliance within the NES-PF rather than seek more stringent regulations. Acknowledges there have been breaches, but that this will happen with any regulation irrespective of its stringency. Notes Regional Council staff will not enforce plans unless there is a complaint. Suggests even Greater Wellington staff are slow to act. Notes 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.	Not stated		No recommendation
S195.015	New Zealand Farm Forestry Association (NZFFA)	FS23.418	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.016	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Comments for policy package option 1, for Plantation forestry and woody vegetation clearance and - efficiency and effectiveness of provisions, in the s32 report are as follows: Considers discrepancies in the interpretation of Te Awarua-o-Porirua WIP recommendations 54 and 55 within the S32 report. 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. Also notes the request for Greater Wellington to work with the industry, which is not happening. Considers PC1 is not an adequate response to these recommendations. Considers that recommendation 37 is not focused on promoting best practices in plantation forestry and monitoring compliance, as highlighted in the S32 report. Notes its focussed on the Council's staffing level and seeks alignment with the NES-PF to enhance outcomes. Considers recommendations WIP 76,77,78 do not require all harvesting to be approved by the Council, or to be a controlled activity. Considers PC1 does not achieve the outcomes sought in the WIP recommendations.	Not stated		No recommendation
S195.016	New Zealand Farm Forestry Association (NZFFA)	FS23.419	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										with Forest & Bird's submission points and specific relief.	
S195.017	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Comments for policy package options 2 and 3, for plantation forestry and woody vegetation clearance and - efficiency and effectiveness of provisions, in the s32 report are as follows: Considers the analysis confuses relative erosion risk with absolute erosion risk. Considers there is loose terminology, as New Policy uses the term "highest erosion risk" while New Rule uses "very high erosion risk," and the two terms are used synonymously when they are quite different. Very high erosion prone land is defined already in the provisions of the NES-CF and requires no change.	Not stated		No recommendation
S195.017	New Zealand Farm Forestry Association (NZFFA)	FS23.420	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.018	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Disagrees with the assessment for options 1, 2 and 3 in the s32 report. Considers there is no basis for the claim that sediment generated by plantation forestry is a problem within the Greater Wellington area because of the regulations governing forestry. Considers there is no evidence of the NES-PF generating worse environmental outcomes in the Wellington area than the pre-2018 consenting regime, nor is there evidence that either forestry or the NES-PF is responsible for the 'current degraded state' of water bodies in the region. Notes there are studies showing that over the course of a whole rotation, commercial forestry is much better than many other land uses at minimising sediment flows. An example is the Pakuratahi paired-catchment study. Contend that the environmental benefits of the three options are equal.	Not stated		No recommendation
S195.018	New Zealand Farm Forestry Association (NZFFA)	FS23.421	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.018	New Zealand Farm Forestry Association (NZFFA)	FS50.093	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and similar considers that the section 32 evaluation do not include sufficient evidence to support the provisions that relate to commercial forestry.	Allow	Not stated	No recommendation
S195.020	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Disagrees with the assessment that the social costs of Option 1 or 3 will be low. Considers both options would reduce plantation forestry activity in the region, leading to job losses within the industry, at the port, and at regional sawmills dependent on logs from the area. Considers the analysis does not attempt to quantify those impacts. With all three options the submitter disputes that plantation forestry contributes in any significant way to the sedimentation of our rivers and argue PC1 is unnecessary. Considers the NES-CF is quite capable of regulating forestry activities to control sediment flows when enforced.	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S195.020	New Zealand Farm Forestry Association (NZFFA)	FS23.423	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.021	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		Considers the analysis in the Section 32 report does not quantify the monetary costs of the options. Notes other significant economic factors are the devaluation of forest land, the reduction of economic activity, and the loss of forest income from both timber and carbon credits. Suggests the economic costs of option 1 are high, and for option 3 are medium as both will increase the costs and create a "negative benefit". Considers the analysis should state this.	Not stated		No recommendation
S195.021	New Zealand Farm Forestry Association (NZFFA)	FS23.424	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.022	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Not Stated		Notes the analysis appears subjective rather than based on evidence or research. Considers making plantation forestry a controlled activity with 10% of the land to be retired will reduce the amount of land in forestry and may not improve water quality but reduce it. Considers there are more effective ways of improving water quality than those proposed under PC1.	Not stated		No recommendation
S195.022	New Zealand Farm Forestry Association (NZFFA)	FS23.425	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.022	New Zealand Farm Forestry Association (NZFFA)	FS50.094	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and shares the view that there are more effective ways of improving water quality when compared to the proposed approach to commercial forestry.	Allow	Not stated	No recommendation
S195.023	New Zealand Farm Forestry Association (NZFFA)			General comments	General comments - plantation forestry	Oppose		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.	Not stated		No recommendation
S195.023	New Zealand Farm Forestry Association (NZFFA)	FS23.426	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.024	New Zealand Farm Forestry Association (NZFFA)			2 Interpretation	General comments - definitions	Not Stated		PC1 uses the term 'plantation forestry' but it does not define it. Similarly it does not define 'harvesting.' There are alternatives to clear-felling, such as small coupe harvesting and continuous cover harvesting,	Define plantation forestry in accordance with NES-CF Define harvesting and exclude		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								which have little impact on either biodiversity or water quality. PC1 refers to an 'FMU,' yet this is only defined in the Section 32 report.	continuous cover and small coupe harvesting Define FMU		
S195.024	New Zealand Farm Forestry Association (NZFFA)	FS23.427	Forest & Bird	2 Interpretation	General comments - definitions		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S195.025	New Zealand Farm Forestry Association (NZFFA) (S195)			General comments	General comments - maps	Oppose		Notes 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. Consider the measure of erosion risk used is questionable as replanting forestry has a lower erosion risk than converting land to pasture. Considers the 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. Suggests the mapping would have required at least a contiguous size of 0.5 ha for each class of risk to be credible.	Remapping is required		Accept in part
S195.025	New Zealand Farm Forestry Association (NZFFA)	FS23.428	Forest & Bird	General comments	General comments - maps		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.025	New Zealand Farm Forestry Association (NZFFA)	FS50.095	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - maps		Support	NZCF supports the submission and has similar concerns about the accuracy and usability of the maps.	Allow	Not stated	Accept in part
S195.027	New Zealand Farm Forestry Association (NZFFA)			2 Interpretation	General comments - overall	Not Stated		Where they are not in conflict with this submission, supports the submissions from New Zealand Farm Forestry association – Wellington Branch, New Zealand Carbon Farming Group, Forest Enterprises, China National Forestry Group, John Turkington Limited and Juken New Zealand Limited.	Not stated		No recommendation
S195.027	New Zealand Farm Forestry Association (NZFFA)	FS23.430	Forest & Bird	2 Interpretation	General comments - overall		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S195.029	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF		Reject
S195.029	New Zealand Farm Forestry Association (NZFFA)	FS25.078	Guildford Timber Company Limited, Silverstream Forest Limited and the	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	The request represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and more stringent are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA	Allow	Remove rules more stringent than the NES-CF	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Goodwin Estate Trust.								
S195.029	New Zealand Farm Forestry Association (NZFFA)	FS23.432	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S195.029	New Zealand Farm Forestry Association (NZFFA)	FS50.096	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Reject
S195.030	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Oppose		Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF		Reject
S195.030	New Zealand Farm Forestry Association (NZFFA)	FS25.080	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	The request represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and more stringent are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA	Allow	Remove rules more stringent than the NES-CF	Reject
S195.030	New Zealand Farm Forestry Association (NZFFA)	FS23.433	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S195.030	New Zealand Farm Forestry Association (NZFFA)	FS50.097	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Reject
S195.031	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Oppose		Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF		Accept in part
S195.031	New Zealand Farm Forestry Association (NZFFA)	FS25.081	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	The request represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and more stringent are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA	Allow	Remove rules more stringent than the NES-CF	Accept in part
S195.031	New Zealand Farm Forestry Association (NZFFA)	FS23.434	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.031	New Zealand Farm Forestry	FS50.098	New Zealand Carbon	8 Whaitua Te	Rule WH.R22: Plantation forestry		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Association (NZFFA)		Farming Group ('NZCF')	Whanganui-a-Tara	on highest erosion risk land – prohibited activity.			such time as the effectiveness of the NESCF has been appropriately evaluated.			
S195.032	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF		Reject
S195.032	New Zealand Farm Forestry Association (NZFFA)	FS23.435	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S195.032	New Zealand Farm Forestry Association (NZFFA)	FS50.099	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Reject
S195.033	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Oppose		Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF		Reject
S195.033	New Zealand Farm Forestry Association (NZFFA)	FS23.436	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S195.033	New Zealand Farm Forestry Association (NZFFA)	FS50.100	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Reject
S195.034	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Oppose		Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF		Accept in part
S195.034	New Zealand Farm Forestry Association (NZFFA)	FS23.437	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.034	New Zealand Farm Forestry Association (NZFFA)	FS50.101	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.037	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Not stated		Reject
S195.037	New Zealand Farm Forestry Association (NZFFA)	FS23.440	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										points are consistent with Forest & Bird's submission points and specific relief.	
S195.038	New Zealand Farm Forestry Association (NZFFA)			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Not stated		Reject
S195.038	New Zealand Farm Forestry Association (NZFFA)	FS23.441	Forest & Bird	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S195.039	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Oppose		Considers the classification of land as high or highest risk does not express the absolute risk, but rather the risk relative to all other land with the same land use. The submitter notes a block of grazing land, adjacent to an existing forest on the same type of land could be classified as highest risk while the forests next to it would not. Considers this would prevent the agricultural land from being afforested despite the change resulting in higher water quality. Considers the relative assessment of risk is commercially and environmentally unsound, and appears biased against forestry. Considers for forestry, the information requirements in Schedule 34 such as details 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. Questions why the information requested is required. 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. As the RMA requires policies and rules to be effects based, it is considered these rules do not appear to comply.	Remove afforestation from P.R.19 and WH.R20 Should neither the plan change process nor the courts accept this submission point it is requested that for afforestation activities, Rule P.R19 (b) and Rule WH.R20 (b) be removed and the ESC classification of erosion risk used in the NES-CF be applied		Accept in part
S195.039	New Zealand Farm Forestry Association (NZFFA)	FS23.442	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.040	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Considers these rules impractical for the following reasons: Considers the rules are unnecessarily harsh 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. Considers 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. Notes	Should neither the plan change process nor the courts accept the removal of Rule P.R19 and Rule WH.R20 for afforestation activities, it is requested that for afforestation activities conditions (c) and (d) be removed from Rule P.R19 and Rule WH.R20.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								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. Suggests the rules are too broadly drafted.			
S195.040	New Zealand Farm Forestry Association (NZFFA)	FS23.443	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.040	New Zealand Farm Forestry Association (NZFFA)	FS50.104	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.041	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Considers the classification of land as high or highest risk does not express the absolute risk, but rather the risk relative to all other land with the same land use. The submitter notes a block of grazing land, adjacent to an existing forest on the same type of land could be classified as highest risk while the forests next to it would not. Considers this would prevent the agricultural land from being afforested despite the change resulting in higher water quality. Considers the relative assessment of risk is commercially and environmentally unsound, and appears biased against forestry. Considers for forestry, the information requirements in Schedule 34 such as details 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. Questions why the information requested is required. 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. As the RMA requires policies and rules to be effects based, it is considered these rules do not appear to comply.	Remove afforestation from P.R.19 and WH.R20Should neither the plan change process nor the courts accept this submission point it is requested that for afforestation activities, Rule P.R19 (b) and Rule WH.R20 (b) be removed and the ESC classification of erosion risk used in the NES-CF be applied		Accept in part
S195.041	New Zealand Farm Forestry Association (NZFFA)	FS25.079	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support in part	Should the rule be retained and not deleted as requested by the GTC in their submission, the amendment requested represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and controls on afforestation are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA	Allow in part	Remove afforestation from Rule WH.R20	Accept in part
S195.041	New Zealand Farm Forestry Association (NZFFA)	FS23.444	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S195.041	New Zealand Farm Forestry Association (NZFFA)	FS50.105	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.042	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Considers these rules impractical for the following reasons: Considers the rules are unnecessarily harsh 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. Considers 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. Notes 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. Suggests the rules are too broadly drafted.	Should neither the plan change process nor the courts accept the removal of Rule P.R19 and Rule WH.R20 for afforestation activities, it is requested that for afforestation activities conditions (c) and (d) be removed from Rule P.R19 and Rule WH.R20.		Accept in part
S195.042	New Zealand Farm Forestry Association (NZFFA)	FS23.445	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.042	New Zealand Farm Forestry Association (NZFFA)	FS50.106	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.043	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Questions whether GWRC has the staff, or technical and commercial expertise, to exercise the controls specified in (1) and (2). Considers the Whaitua recommendation observed that the Council could not discharge its responsibilities under the NES-PF. Considers the Council could face high liabilities if they get things wrong.	Remove items (1) and (2) from the Matters of Control.		Accept in part
S195.043	New Zealand Farm Forestry Association (NZFFA)	FS23.446	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.044	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Questions whether GWRC has the staff, or technical and commercial expertise, to exercise the controls specified in (1) and (2). Considers the Whaitua recommendation observed that the Council could not discharge its responsibilities under the NES-PF. Considers the Council could face high liabilities if they get things wrong.	Remove items (1) and (2) from the Matters of Control.		Accept in part
S195.044	New Zealand Farm Forestry Association (NZFFA)	FS23.447	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought unless otherwise	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		stated or where points are consistent with Forest & Bird's submission points and specific relief.	
S195.045	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Oppose		Considers the classification of forest land as “highest risk” is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan 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. Questions why Rules R.P19, P.20, 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. Questions 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. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22		Accept in part
S195.045	New Zealand Farm Forestry Association (NZFFA)	FS23.448	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.045	New Zealand Farm Forestry Association (NZFFA)	FS50.107	New Zealand Carbon Farming Group (NZCF)	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S195.046	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Considers the classification of forest land as “highest risk” is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan 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. Questions why Rules R.P19, P.20, 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. Questions 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. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22		Accept in part
S195.046	New Zealand Farm Forestry Association (NZFFA)	FS23.449	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.046	New Zealand Farm Forestry Association (NZFFA)	FS50.108	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.047	New Zealand Farm Forestry Association (NZFFA)			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Oppose		Considers the classification of forest land as “highest risk” is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan 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. Questions why Rules R.P19, P.20, 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. Questions 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. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.	Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22		
S195.047	New Zealand Farm Forestry Association (NZFFA)	FS23.450	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.047	New Zealand Farm Forestry Association (NZFFA)	FS50.109	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.048	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Considers the classification of forest land as “highest risk” is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan 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. Questions why Rules R.P19, P.20, 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. Questions 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. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.			
S195.048	New Zealand Farm Forestry Association (NZFFA)	FS23.451	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.048	New Zealand Farm Forestry Association (NZFFA)	FS50.110	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.049	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Oppose		Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								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. Questions why Rules R.P19, P.20, 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. Questions 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. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.			
S195.049	New Zealand Farm Forestry Association (NZFFA)	FS23.452	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.049	New Zealand Farm Forestry Association (NZFFA)	FS50.111	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.050	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Oppose		Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan 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. Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment. Questions 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. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.			
S195.050	New Zealand Farm Forestry Association (NZFFA)	FS23.453	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S195.050	New Zealand Farm Forestry Association (NZFFA)	FS50.112	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S195.051	New Zealand Farm Forestry Association (NZFFA)			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose		In Objective B (2) it is noted the term 'natural state' is undefined. Considers if this objective is to apply to forest land it should equally apply to other land uses. Considers the identification and classification of 'highest erosion risk' land relied on in Objective B (4) is unsuitable.	Remove objectives B (2) and B (4) from Schedule 34.		Accept
S195.051	New Zealand Farm Forestry Association (NZFFA)	FS23.454	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S195.051	New Zealand Farm Forestry Association (NZFFA)	FS50.113	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	In addition to the relief sought in NZCF's primary submission, NZCF generally agrees with the submission for the reasons given.	Allow	Not stated	Accept
S198.001	Wayne Bettjeman			2 Interpretation	General comments - overall	Not Stated		Supports the submissions of the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Association.	Not Stated		No recommendation
S199.004	Pikarere Farm Limited			13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Amend		Considers submitters farm, although identified on the "Highest Erosion Risk Land" shown on Maps 91 and 94, does not include any significant erosion risk.	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S199.005	Pikarere Farm Limited			13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.	Amend		Considers submitters farm, although identified on the "Highest Erosion Risk Land" shown on Maps 91 and 94, does not include any significant erosion risk.	Not stated		No recommendation
S2.034	Horokiwi Quarries Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Oppose		Should the definition and mapping be retained, the submitter considers that the rule is limiting in that it does not allow for any vegetation clearance of the specified land for most land uses. Considers the existing approach of managing erosion-prone land under Rule R104 -R107 of the NRP is more fit for purpose. Also, based on the Section 32 Evaluation, there are no apparent implementation issues associated with the existing rule framework. While the submitter's preference is that the existing rules of the operative plan are retained, should the proposed rules remain, they seek that the permitted rule provides for additional clearance of up to 200 m2 to avoid clearance of less than 200m2 becoming an innominate activity (and therefore discretionary). Opposes that the rule is subject to the Freshwater Planning Process as the rule relates to erosion and soil conservation, rather than specifically freshwater. Considers 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.	Review mapping and definition of "erosion prone land". Consider Rule WH.R17 under a Part 1 Schedule 1 process. Amend Rule WH.R17 as follows: Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, or (iii) no more than 200 m2 per property of vegetation clearance on highest erosion risk land (woody vegetation) in any consecutive 12-month period, and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.		Accept in part
S2.034	Horokiwi Quarries Ltd	FS47.227	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow in part	Allow S2.034 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Accept in part
S2.035	Horokiwi Quarries Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Neutral		Supports Rule WH.R18 in principle but considers this rule could be anticipated to capture the majority of vegetation clearance applications sought, where the permitted rule is not met. Clarification is sought as to how the 200m2 is calculated – is it the actual and cumulative area of identified woody vegetation or on a site that contains an area of woody vegetation? Opposes subjecting the rule to the Freshwater Planning Process as the rule relates to erosion and soil conservation, rather than specifically freshwater. Considers 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.	Review mapping and definition of "erosion prone land".Consider Rule WH.R18 under a Part 1 Schedule 1 process.Retain a controlled activity rule for vegetation clearance greater than 200 m2 over high erosion risk land.Clarity how the 200m2 will be calculated.		Accept in part
S2.036	Horokiwi Quarries Ltd			8 Whaitua Te	Rule WH.R19: Vegetation	Amend		Depending on the outcome of other submission points, the submitter is neutral on rule WH.R19.	Review mapping and definition of "erosion prone land".		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	clearance – discretionary activity.			Opposes subjecting the rule to the Freshwater Planning Process as the rule relates to erosion and soil conservation, rather than specifically freshwater. Considers 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.	Consider Rule WH.R18 under a Part 1 Schedule 1 process.		
S2.042	Horokiwi Quarries Ltd			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Amend		Opposes the schedule being included within the freshwater planning instrument, as the purpose of the schedule is to manage land use for soil conservation. Considers 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. The schedule is generally supported subject to an amendment to clause (d) to recognise that restoring and revegetating is not always practicable, particularly for activities such as quarrying where surfaces must remain exposed.	Consider Schedule 33 under a Part 1 Schedule 1 process. Amend Part B of Schedule 33 as follows: A Management objectives The Erosion and Sediment Management Plan must demonstrate that the measures adopted to address the identified risks will: (a) minimise sediment loss from the vegetation clearance by adopting, as a minimum, good management practice, and (b) 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 (c) minimise the discharge of water and sediment resulting from the vegetation clearance into a surface water body, and (d) where appropriate, provide for the land to be restored and revegetated with appropriate species.		Reject
S204.008	Willowbank Trustee Limited			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Not Stated		It is not always possible to establish woody vegetation on pasture due to differing land qualities such as soil type, soil depth, and exposed ridgelines. Policy P.P22(c)(i) should focus on addressing erosion risk in an achievable and appropriate manner, which may lead to site-specific solutions, rather than requiring a “one size fits all” approach. As a consequence, Willowbank also seeks:(i) Amendment to Policy P.P2(g) to either delete “with woody vegetation” or revising to include: “with woody vegetation where practicable to do so”.(ii) Amendment to Policy P.P20.3 by including “where practicable” after “woody vegetation”.(iii) Amendment to Schedule 33: C1(c)(v) by including “where practicable” after “woody vegetation”.(iv) Amendment to Schedule 36: E.1 by incorporating a “reasonably practicable” element to the establishment of permanent woody vegetation.	Amend Schedule 33: C1(c)(v) by including “where practicable” after “woody vegetation”.		Reject
S206.022	Winstone Aggregates			General comments	General comments - fresh water	Oppose		Concerned that several provisions are subject to the Freshwater Planning Process (FPP) where freshwater is only a peripheral issue to which the provision relates. Considers this an inappropriate use of the FPP, giving rise to jurisdictional problems such as restricted appeal rights. Considers improper allocation results in delays and costs, and is exacerbated by the restrictive activity statuses proposed.	Review the scope of FPP versus Schedule 1 processes. Only provisions where freshwater is the primary issue to be subject to the FPP; remaining provisions allocated to Schedule 1.		Reject
S206.022	Winstone Aggregates	FS25.018	Guildford Timber Company Limited, Silverstream Forest Limited and the	General comments	General comments - fresh water		Support	Request represents good planning practice and has legal merit	Allow	Review PC1 - Only provisions where freshwater is the primary issue to be subject to FPP - remaining provisions allocated to Schedule 1 process	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Goodwin Estate Trust.								
S206.025	Winstone Aggregates			General comments	Highest erosion risk land (plantation forestry)	Oppose		Opposes the mapping associated with the definition. Considers the mapping too high level and unsubstantiated. Seeks for the existing approach (including the existing definition of "erosion prone land ") to be retained until a robust vegetation and land stability mapping exercise is undertaken. Opposes the definition as being subject to the Freshwater Planning Process, and considers the definition and associated rules relate to soil conservation rather than freshwater. Considers the approach inconsistent with RPS Proposed Change 1, which is subject to the Schedule 1 Process.	Update mapping with accurate and evidence-based mapping, or delete definition and retain existing NRP definition: Erosion prone land The pre-existing slope of the land exceeds 20 degrees. Should the definition be retained, seek it be subject to the Part 1 Schedule 1 Process and not the Freshwater Planning Process.		Accept in part
S206.025	Winstone Aggregates	FS25.019	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	General comments	Highest erosion risk land (plantation forestry)		Support	Submission is consistent with GTC's own submission and the concern regarding the accuracy of mapping and the provisions being subject to the Part 1 Schedule 1 Process and not the FPP	Allow	Update mapping with accurate evidence based mapping or delete definition and retain existing NRP definition; if definition retained, seek it be subject to the Part 1 Schedule 1 Process and not the FPP	Accept in part
S206.027	Winstone Aggregates			General comments	Highest erosion risk land (woody vegetation)	Oppose		Opposes the mapping associated with the definition. Considers the mapping too high level and unsubstantiated, noting that high erosion risk land (woody vegetation) is shown to be within an operational quarry. Seeks for the existing approach (including the existing definition of "erosion prone land") to be retained until a robust vegetation and land stability mapping exercise is undertaken. Opposes the definition as being subject to the Freshwater Planning Process, and considers the definition and associated rules relate to soil conservation rather than freshwater. Considers the approach inconsistent with RPS Proposed Change 1, which is subject to the Schedule 1 Process.	Update mapping with accurate and evidence-based mapping, or delete definition and retain existing NRP definition: Erosion prone land The pre-existing slope of the land exceeds 20 degrees. Should the definition be retained, seek it be subject to the Part 1 Schedule 1 Process and not the Freshwater Planning Process.		Accept in part
S206.027	Winstone Aggregates	FS47.123	Meridian Energy Limited	General comments	Highest erosion risk land (woody vegetation)		Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;	Allow	Allow S206.027.	Accept in part
S206.056	Winstone Aggregates			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Oppose		Opposes the mapping associated with the definition of "high erosion risk land (woody vegetation)", per the submitter's submission on the definition. Considers the rule limiting as it does not allow vegetation clearance of the specified land for most land uses. Considers the existing approach under Rules R104-107 of the NRP is more fit for purpose, noting the s32 evaluation does not identify implementation issues with the existing rule framework. Prefers existing rules are retained; should proposed rules remain, seeks the permitted rule provides for additional clearance up to 200m2, noting clearance greater than 200m2 is a controlled activity. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	1.Review mapping and definition of "erosion prone land". 2. Consider Rule WH.R17 under a Part 1 Schedule 1 process. 3. Amend Rule WH.R17 as follows: Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, or (iii) no more than 200 m2 per property of vegetation clearance on highest erosion risk land (woody vegetation) in any consecutive 12-month period, and		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									(b) debris from the vegetation clearance is not placed where it can enter a surface water body.		
S206.056	Winstone Aggregates	FS47.230	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow in part	Allow S206.056 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Accept in part
S206.057	Winstone Aggregates			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Neutral		Opposes the mapping associated with the definition of “high erosion risk land (woody vegetation)”, per the submitter’s submission on the definition. Notwithstanding this, supports the rule as it provides reasonable certainty to landowners that consent will be granted. Considers the rules could anticipate capturing the majority of vegetation clearance applications sought where the permitted rule is not met. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Review mapping and definition of “erosion prone land”. Consider Rule WH.R18 under a Part 1 Schedule 1 process. Retain a controlled activity rule for vegetation clearance greater than 200 m2 over high erosion risk land.		Accept in part
S206.057	Winstone Aggregates	FS25.022	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support in part	Request represents good planning practice and has legal merit	Allow in part	Consider Rule WH.R18 under a Part 1 Schedule 1 process	Accept in part
S206.057	Winstone Aggregates	FS47.239	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	For the reasons explained above, Meridian considers the permitted activity area limit (in Rule WH.R17) should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule WH.R18;	Disallow	Disallow S206.057.	Accept in part
S206.058	Winstone Aggregates			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Amend		Submitter is neutral to the rule, noting their support for Rule WH.R18, which is anticipated to capture most vegetation clearance that does not meet the permitted rule. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Review mapping and definition of “erosion prone land”. Consider Rule WH.R18 under a Part 1 Schedule 1 process.		Accept in part
S206.058	Winstone Aggregates	FS25.023	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support in part	Request represents good planning practice and has legal merit	Allow in part	Consider Rule WH.R19 under a Part 1 Schedule 1 process	Accept in part
S206.084	Winstone Aggregates			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	Oppose		Opposes the mapping associated with the definition of “high erosion risk land (woody vegetation)”, per the submitter’s submission on the definition. Considers the rule limiting as it does not allow vegetation clearance of the specified land for most land uses. Considers the existing approach under Rules R104-107 of the NRP is more fit for purpose, noting the s32	1. Review mapping and definition of “erosion prone land”. 2. Consider Rule P.R16 under a Part 1 Schedule 1 process. 3. Amend Rule P.R16 as follows:		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								evaluation does not identify implementation issues with the existing rule framework. Prefers existing rules are retained; should proposed rules remain, seeks the permitted rule provides for additional clearance up to 200m2, noting clearance greater than 200m2 is a controlled activity. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, or (iii) no more than 200 m2 per property of vegetation clearance on highest erosion risk land (woody vegetation) in any consecutive 12-month period, and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.		
S206.084	Winstone Aggregates	FS47.368	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow in part	Allow S206.084 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Accept in part
S206.085	Winstone Aggregates			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Neutral		Opposes the mapping associated with the definition of “high erosion risk land (woody vegetation)”, per the submitter’s submission on the definition. Notwithstanding this, supports the rule as it provides reasonable certainty to landowners that consent will be granted. Considers the rules could anticipate capturing the majority of vegetation clearance applications sought where the permitted rule is not met. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Review mapping and definition of “erosion prone land”. Consider Rule P.R17 under a Part 1 Schedule 1 process. Retain a controlled activity rule for vegetation clearance greater than 200 m2 over high erosion risk land.		Accept in part
S206.085	Winstone Aggregates	FS47.377	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	For the reasons explained above, Meridian considers the permitted activity area limit (in Rule P.R16) should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of RuleP.R17;	Disallow	Disallow S206.085.	Accept in part
S206.086	Winstone Aggregates			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Amend		Submitter is neutral to the rule, noting their support for Rule P.R17, which is anticipated to capture most vegetation clearance that does not meet the permitted rule. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Review mapping and definition of “erosion prone land”. Consider Rule P.R18 under a Part 1 Schedule 1 process.		Accept in part
S206.092	Winstone Aggregates			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Clearance Erosion and Sediment Management Plan.	Amend		Considers objective (d) under part B is not practicable, noting that restoring and revegetating is not always practicable, particularly for activities such as quarrying where surfaces remain exposed. Opposes the schedule being subject to the Freshwater Planning Process, as it directly relates to erosion and soil conservation rather than freshwater.	Consider Schedule 33 under a Part 1 Schedule 1 process. Amend Part B of Schedule 33: A Management objectives The Erosion and Sediment Management Plan must demonstrate that the measures adopted to address the identified risks will:		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									(a) minimise sediment loss from the vegetation clearance by adopting, as a minimum, good management practice, and (b) 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 (c) minimise the discharge of water and sediment resulting from the vegetation clearance into a surface water body, and (d) where appropriate, provide for the land to be restored and revegetated with appropriate species.		
S206.094	Winstone Aggregates			13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.	Oppose		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 the active Belmont Quarry as shown on map in Appendix 2 of submission. Seeks the mapping to be revised or removed entirely.	Update mapping with accurate and evidence-based mapping, or delete definitions and retain existing definition of “erosion prone land” as shown below: Erosion prone land The pre-existing slope of the land exceeds 20 degrees.		Accept in part
S21.001	William Studd			9 Te Awarua-o-Porirua Whaitua	Rule R104: Vegetation clearance on erosion prone land – permitted activity.	Amend		Supports the submission from NZFFA. More scientific evidence and detailed expert consideration is required before amending the current NES-CF plan.	Not stated		No recommendation
S210.003	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			General comments	General comments - plantation forestry	Amend		The submitter considers the NES-CF provides a consistent and clear process for forestry practitioners to manage forestry operations, including on sites susceptible to erosion. The submitter is concerned the provisions included in PC1 add additional layers of requirements in policies and rules that are more restrictive to the updated NES-CF that are unjustified and unwarranted, and not required to implement the objectives of the NRP or NPS-FW. Considers these additional provisions will cause additional costs and delays, and potential confusion around which rules need to be considered on site. The submitter has reviewed and considered the proposed changes and does not see the proposed standards helping to manage more effectively the resource management issues encountered with commercial forestry. PC1 also provides for additional management practices and documentation for erosion and sediment control processes which are not occurring within 10m of a water body on areas identified by GWRC as having highly erodible soil. The level of assessment under Schedule 34 is above and beyond what is required under the NES-CF and are onerous and unnecessary for managing commercial forestry resource management issue. The requirement to progressively reduce and cease plantation (commercial) forestry beyond the next harvest on the highest erosion risk land and then to provide an objective to restore and revegetate the site, with a presumably native permanent woody species, is also strongly opposed. The submitter considers prohibiting forestry activity after the last harvest and then dictating through the schedule to not be able to consider other land uses for the site is a totally inappropriate use of the plan making tools available to manage resource management issues. It is an over-reaction and does not take into account the	Seeks the following: NES-CF is used as the basis of management of commercial forestry in the Wellington region and the rules restricting plantation (commercial) forestry rules are deleted; Correctly refer to the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (Updated 3 November 2023); Correctly refer to ‘commercial forestry’ to be consistent with the updated NES-CF; Correct the Note after Rule WH.R19 on page 98 to refer to the NES-CF.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								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. The submitter also notes there are also a number of definitions which incorrectly refer to the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017. This incorrect reference is used throughout the PC1 provisions. This name was changed to the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 on 03 November 2023, by regulation 4 of the Resource Management (National Environmental Standards for Commercial Forestry) Amendment Regulations 2023. Furthermore the submitters note the term 'plantation forestry' is used throughout PC1 and is not defined. References to 'plantation forestry' in the NES-CF have been changed to 'commercial forestry' as part of the amendment regulations, and for consistency PC1 should reflect these changes. Finally, the submitters have identified that the 'Note' following Rule WH.R19 on page 98 of PC1 incorrectly references the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 instead of the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (updated November 2023).			
S210.003	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS50.069	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. Further, NZCF considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient.	Allow	Not stated	Accept in part
S210.004	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			General comments	General comments - plantation forestry	Amend		Submitter 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. In particular, the submitter 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 primary aim of these is regulations is forestry not freshwater; Policy WH.P28; Rules WH.R20; WH.R21 and WH.R22 controlling plantation (commercial) forestry are all allocated to the FPP process; Rules WH.R17; WH.R18 and WH.R19 relating to vegetation clearance are all allocated to the FPP process.	Seek that definitions, policies and rules related to plantation (commercial) forestry covered by the NES-CF be removed from the FPP process		Reject
S210.007	Guildford Timber Company Limited, Silverstream			General comments	Highest erosion risk land (plantation forestry)	Oppose		Opposes mapping of 'highest erosion risk land (plantation forestry)' and 'highest erosion risk land (woody vegetation)'. Notes the NES-CF uses a different erosion susceptibility classification tool that divides the NZ landscape into 4 erosion categories:	Seeks the following: The management of commercial forestry activities on the submitters land be undertaken in accordance with the		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Forest Limited and the Goodwin Estate Trust.							green (low) and yellow (moderate) – land less likely to erode where commercial forestry activities are permitted (subject to conditions being met); Orange (high risk) and red (very high risk) – land more likely to erode where most forestry activities can't be carried out on red-zoned land without resource consent, and some activities such as earthworks also require consent on orange-zoned land. Using this classification the submitters land is zoned green and yellow on the Ministry of Primary Industries (MPI) mapping of areas, meaning forestry activity is permitted under the NES-CF subject to meeting conditions. This classification seems to be in direct conflict to the maps prepared by GWRC which include 'highest erosion risk land (plantation forestry)' over the submitters land. The submitter therefore 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. 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. This poor mapping quality needs to be resolved so land users are able to determine where these areas are on their property, and the poor mapping could cause GWRC compliance issues at a later date. Considers it not possible for individual submitters to determine the extent their land is affected and to make a submission, this mapping should be redone and that aspect of the plan re-notified.	erosion susceptibility classification tool and the requirements of the NES-CF; That these PC1 definitions and provisions be deleted or the NRP be amended to be consistent with and take the same approach as the NES-CF - a more restrictive approach is not justified; 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.		
S210.007	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS50.070	New Zealand Carbon Farming Group ('NZCF')	General comments	Highest erosion risk land (plantation forestry)		Support in part	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF. That said, NZCF considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient.	Allow in part	Not stated	Accept in part
S210.034	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Oppose intent of Policy WH.P28 that has direct relevance to their commercial forestry operations, and results in the introduction of prohibited activity Rule WH.R22. As previously discussed in Submission Point #3 of the original submission, the submitter seeks commercial forestry activities to be managed through NES-CF which they consider are appropriate and justified. The submitter also raises the question of the differences in the mapping of erosion risk land in Submission Point #5 of the original submission and the quality of the mapping which is poor and is difficult to tell where the high erosion risk land (plantation (commercial) forestry) areas shown on Map 95 start and finish on the submitter's site due to the pixelation that occurs when zooming in on a particular area. Oppose Clause (c) that seeks to prohibit new and continuing (after harvesting) of plantation (commercial) forestry on highest erosion risk land (plantation forestry), which leads to prohibited activity Rule WH.R22. The submitters note the intent of Clause (c) is carried through into Schedule 34, as discussed later in this submission. Oppose the use of prohibited activity rules for the reasons given in PART ONE of the original submission. The submitters do not	Mapping of 'highest erosion risk land (plantation forestry)' be deleted, or amended and improved to a higher quality so that when zooming in on the map a resource user can easily determine where the areas are located on a site; or Deletion of Clause (c).		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								consider the implementation of the PC1 objectives requires or justifies the use of a prohibited activity rule approach and that the provisions of the NES, NPS-CF are more appropriate.			
S210.034	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS50.071	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S210.045	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Supports the permitted activity status for vegetation clearance on highest erosion risk land (woody vegetation) subject to better mapping as addressed in Submission Point #3 in the original submission.	Retain WH.R17 as notified subject to better mapping as addressed in Submission Point #3 of the original submission		Accept in part
S210.046	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Opposes the controlled activity status for vegetation clearance on highest erosion risk land (woody vegetation) of more than a total area of 200m2 per property in any consecutive period. Considers the 200m2 area is far too restrictive and impracticable and does not recognise planation forestry operations that require regular maintenance to cut down trees that potentially affect the slope stability and access of logging tracks. Normal operations also include clearance of 2m strips on either side of the logging track to maintain access. Oppose the need for controlled activity resource consents for these normal commercial forestry maintenance operations, noting they are controlled and managed under the NES-CF and seek an exemption from Rule WH.R18.	Exempt normal plantation (commercial) forestry operation from Rule WH.R18		Accept in part
S210.047	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Support		Supports the discretionary activity status for vegetation clearance on highest erosion risk land (woody vegetation) that do not comply with one or more of the conditions of Rules WH.R17 and WH.R18.	Retain WH.R19 as notified		Reject
S210.047	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS47.247	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Disallow	Disallow S210.047 and reinstate operative NRP Rule R106.	Accept
S210.048	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Oppose the controlled activity status for plantation (commercial) forestry not on high erosion risk land (pasture) or highest erosion risk land (pasture) subject to the conditions and matters of control listed as they 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 submitters do not consider there is any justification for PC1	Delete Rule WH.R20; or as an alternative if it is retained; Amend Rule WH.R20 to be consistent with, and not more restrictive than, the provisions of the NES-CF; and address the mapping issues identified in Submission Point #3 of the original submission, and Remove Rule WH.R20 from the allocation of the provision from the FPP		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								addressing these matters as this adds a further layer of unnecessary bureaucracy and seek the rule to be deleted in its entirety. Should GWRC decline this submission point, would seek Rule WH.R20 to be amended to be consistent with, and not more restrictive than, the NES-CF. Also seek the better mapping as addressed in Submission Point #3 of the original submission, and the submitter is opposed to this rule being allocated to the FPP process given that it does not directly relate to freshwater and is relevant to Forestry NPS and NPS-IB should properly be part of the schedule 1 process.			
S210.048	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS50.072	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. That said, NZCF notes that Rules should not duplicate a National Environmental Standard.	Allow	Not stated	Accept in part
S210.049	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Oppose		Oppose the discretionary activity status for plantation (commercial) forestry that do not comply with one or more of the conditions of Rule WH.20. 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. Do not consider there is any justification for PC1 addressing these matters as this adds a further layer of unnecessary bureaucracy and seek the rule be deleted in its entirety. Should GWRC decline this submission point, seek 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. As discussed in Submission Point #4 of the original submission, the submitter is also opposed to this rule being allocated to the FPP process given that it does not directly relate to freshwater and is relevant to Forestry NPS and NPS-IB should properly be part of the schedule 1 process.	Delete Rule WH.R21; or as an alternative and if it is retained; Amend the activity status of Rule WH.R21 to restricted discretionary activity, with the matters of discretion restricted to the one or more conditions of Rule WH.R20 that cannot be met, and to be consistent with, and not more restrictive than, the provisions of the NES-CF; and Remove Rule WH.R20 from the allocation of the provision from the FPP		Accept
S210.049	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS50.073	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. That said, NZCF notes that Rules should not duplicate a National Environmental Standard.	Allow	Not stated	Accept
S210.050	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Oppose		Opposes Rule WH.R22. As discussed in PART ONE of the original submission, including the prohibited activity status is onerous and not justified by the objectives included in PC1, and any adverse effects of a plantation (commercial) forestry can be considered through a the NESCF provisions, and such an onerous rule will adversely affect the viability of forestry industry in the Region. Considers this approach is not justified, there has been no consultation or engagement with industry and little evidential basis in the s32 to support this approach. There also appears to be little consideration of the need to plant slopes to prevent erosion and the cost	Delete WH.R22		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								of doing so, without a return which will impose a significant burden on submitters. Seek the deletion of Rule WH.R22 in its entirety.			
S210.050	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS50.074	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept
S210.054	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose		Consider Schedule s34 requirements for sediment management plans related to commercial forestry erosion overly onerous and would cause significant costs and potential delays in getting the management plan approved. Consider the sediment management plan requirements should reflect the sediment management approach included in the NES-CF. Particularly opposes the requirements of Management Objective 4 which is implemented through Clause (c) of WH.P28.	Re-write the sediment erosion plan requirements to better reflect the management requirements of the NES-CF, and in particular delete 'Management Objective 4' in any re-write.		Accept in part
S210.054	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS50.075	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S212.002	Heather Phillips			General comments	General comments - plantation forestry	Not Stated		Concern that PC1 does not mention wildfires as the likelihood is increasing through climate change and wildfires can have long-term effects, and there is no mitigation/planning/prevention of wildfires in the plan. Considers the plan promotes the continued plantation of pine trees (plantation forestry) on the highest erosion risk land for soil stabilisation, ignoring the greater danger of fire to the sediment retention requirements of the plan. 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 Give knowledge of burn rates to tree species in New Zealand.	Not Stated		No recommendation
S212.002	Heather Phillips	FS17.001	Wairarapa Federated Farmers	General comments	General comments - plantation forestry		Support in part	Whilst Federated Farmers does not agree with the submitter that the proposed plan promotes the continued planting of pine trees on the highest erosion risk land, we do accept the submitters argument that the plan fails to address the impact of wildfires on the discharge of sediment to catchments, and that the number and extent of wildfires is likely to increase in the future due to the effects of climate change. Federated Farmers considers that the plan change process provides the Council with an opportunity to address the prevention and management of wildfires in the region.	Allow in part	Add a Wildfire objective to Chapter 3 (Objectives) of the pNRP. Identify policies to support the prevention and management of wildfires. Policies could include, for example, maintenance of rural roadside verges to act as fire breaks, controlled burns, setback distances for vegetation around public infrastructure and utilities, installation and	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										maintenance of fire breaks around plantation forests, support for on-farm water storage and requirements for water storage and infrastructure on plantation forestry blocks. Identify rules and other methods to support the prevention and management of wildfires.	
S222.001	Environmental Defence Society Inc.			2 Interpretation	Afforestation	Amend		Refers to outdated regulations.	Refer to updated regulations - NES-CF.		Accept
S222.001	Environmental Defence Society Inc.	FS9.182	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	Afforestation		Oppose	Not stated	Disallow	Not stated	Reject
S222.001	Environmental Defence Society Inc.	FS23.157	Forest & Bird	2 Interpretation	Afforestation		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S222.001	Environmental Defence Society Inc.	FS27.893	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	Afforestation		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.001	Environmental Defence Society Inc.	FS50.040	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	Afforestation		Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Disallow	Not stated	Reject
S222.003	Environmental Defence Society Inc.			General comments	Harvesting	Amend		Refers to outdated regulations.	Refer to updated regulations - NES-CF.		Accept
S222.003	Environmental Defence Society Inc.	FS9.184	New Zealand Farm Forestry Association (NZFFA)	General comments	Harvesting		Oppose	Not stated	Disallow	Not stated	Reject
S222.003	Environmental Defence Society Inc.	FS23.159	Forest & Bird	General comments	Harvesting		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S222.003	Environmental Defence Society Inc.	FS27.895	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	General comments	Harvesting		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.003	Environmental Defence Society Inc.	FS50.042	New Zealand Carbon Farming Group ('NZCF')	General comments	Harvesting		Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Disallow	Not stated	Reject
S222.004	Environmental Defence Society Inc.			General comments	Mechanical land preparation	Amend		Refers to outdated regulations.	Refer to updated regulations - NES-CF.		Accept
S222.004	Environmental Defence Society Inc.	FS9.185	New Zealand Farm Forestry Association (NZFFA)	General comments	Mechanical land preparation		Oppose	Not stated	Disallow	Not stated	Accept
S222.004	Environmental Defence Society Inc.	FS23.160	Forest & Bird	General comments	Mechanical land preparation		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S222.004	Environmental Defence Society Inc.	FS27.896	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	General comments	Mechanical land preparation		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.004	Environmental Defence Society Inc.	FS50.043	New Zealand Carbon Farming Group ('NZCF')	General comments	Mechanical land preparation		Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Disallow	Not stated	Accept
S222.006	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Replanting	Amend		Refers to outdated regulations	Refer to updated regulations - NES-CF.		Accept
S222.006	Environmental Defence Society Inc.	FS9.187	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Replanting		Oppose	Not stated	Disallow	Not stated	Reject
S222.006	Environmental Defence Society Inc.	FS23.162	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Replanting		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S222.006	Environmental Defence Society Inc.	FS27.898	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Replanting		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.006	Environmental Defence Society Inc.	FS50.044	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Replanting		Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Disallow	Not stated	Reject
S222.007	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Amend		Refers to outdated regulations	Refer to updated regulations - NES-CF.		Accept
S222.007	Environmental Defence Society Inc.	FS9.188	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Oppose	Not stated	Disallow	Not stated	Reject
S222.007	Environmental Defence Society Inc.	FS23.163	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S222.007	Environmental Defence Society Inc.	FS27.899	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.007	Environmental Defence Society Inc.	FS50.045	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Disallow	Not stated	Reject
S222.048	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Amend		To give effect to NPSFM.	Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting.		Reject
S222.048	Environmental Defence Society Inc.	FS25.065	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	The need to require setbacks, alternative harvesting methods and/or limit harvesting is not necessary in the NRP as the requirements of the NES-CF should take precedence and the additional wording is not necessary to implement the NPS-FM or to achieve the purpose of the RMA	Disallow	Retain the wording of Policy WH.P28 as notified, subject to the amendment sought by GTC in their original submission	Accept
S222.048	Environmental Defence Society Inc.	FS9.229	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Not stated	Disallow	Not stated	Accept
S222.048	Environmental Defence Society Inc.	FS23.204	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S222.048	Environmental Defence Society Inc.	FS27.940	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.048	Environmental Defence Society Inc.	FS50.046	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	NZCF does not support the submission on the basis that the relief sought is not clear in terms of the scope of restrictions sought and no consideration is given to how the relief relates to the NESCF.	Disallow	Not stated	Accept
S222.057	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		To give effect to NPSFM and comply with RMA.	Make a controlled activity or alternatively amend permitted activity standards to avoid sedimentation of receiving waterbodies and the coastal marine area.		Accept in part
S222.057	Environmental Defence Society Inc.	FS8.016	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Winstone oppose modifying the activity status. The permitted status, subject to the proposed conditions, will ensure that adverse effects are appropriately managed. Requiring consent for all vegetation clearance will result in unreasonable consenting cost and delay.	Disallow	Winstone seek that relief sought is not allowed and that the activity status for WH.R17 remains permitted.	Accept in part
S222.057	Environmental Defence Society Inc.	FS9.238	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept in part
S222.057	Environmental Defence Society Inc.	FS20.007	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Refer to Transpower's submission on rule WH.R17. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid. However, if the decision requested by Transpower in its submission on rule WH.R17 is allowed, then Transpower would adopt a neutral position on this submission point.	Disallow	Transpower opposes the request to change activity status of rule WH.R17 from permitted to controlled.	Accept in part
S222.057	Environmental Defence Society Inc.	FS23.213	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept in part
S222.057	Environmental Defence Society Inc.	FS27.949	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.057	Environmental Defence Society Inc.	FS47.231	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), considers permitted activity status is appropriate. Meridian also considers the limits in operative Rule R104 or an area limit for regionally significant infrastructure consistent with the limits in Rule R104 is appropriate;	Disallow	Disallow S222.057.	Accept in part
S222.058	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		To give effect to NPSFM and comply with RMA.	Make a discretionary or restricted discretionary activity to ensure the avoidance of adverse sedimentation effects associated with the clearance.		Accept in part
S222.058	Environmental Defence Society Inc.	FS8.017	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Winstone oppose modifying the activity status. The controlled activity status subject to the to the conditions and matters of control appropriately manage effects to erosion prone land while providing sufficient certainty to landowners. Increasing the activity status will result in further uncertainty and an unreasonably onerous consenting process.	Disallow	Winstone seek that relief sought is not allowed and that the activity status for WH.R18 remains controlled.	Accept in part
S222.058	Environmental Defence Society Inc.	FS9.239	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Not stated	Disallow	Not stated	Accept in part
S222.058	Environmental Defence Society Inc.	FS20.008	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Refer to Transpower's submission on rule WH.R17. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid, where this breaches the standards in rule WH.R17. However, if the decision requested by Transpower in its submission on rule WH.R17 is allowed, then Transpower would adopt a neutral position on this submission point.	Disallow	Transpower opposes the request to change activity status of rule WH.R18 from controlled to discretionary or restricted discretionary.	Accept in part
S222.058	Environmental Defence Society Inc.	FS23.214	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.058	Environmental Defence Society Inc.	FS27.950	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S222.058	Environmental Defence Society Inc.	FS47.240	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule WH.R18. Meridian considers the controlled activity default provision is appropriate;	Disallow	Disallow S222.058, allow general vegetation clearance as a permitted activity with limits matching those in operative Rule R104 and make consequential amendments to Rule WH.R18 to increase the threshold area to match Rule WH.R17.	Accept in part
S222.059	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Amend		To give effect to NPSFM and comply with RMA.	"Vegetation clearance" is defined to not include commercial forest trees. Need to clarify whether Rules WH.R17 - 20 apply to commercial forestry activities. The "Note" in Rule WH R19 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.		Accept in part
S222.059	Environmental Defence Society Inc.	FS9.240	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.059	Environmental Defence Society Inc.	FS23.215	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept in part
S222.059	Environmental Defence Society Inc.	FS27.951	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S222.060	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Amend		To give effect to NPSFM and comply with RMA.	Make a discretionary or restricted discretionary activity.		Accept
S222.060	Environmental Defence Society Inc.	FS25.067	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose in part	If the rule remains, the need to reclassify the activity status to discretionary or restricted discretionary is not necessary to implement the NPS-FM or to achieve the purpose of the RMA	Disallow in part	Retain controlled activity status of Rule WH.R20 as notified, subject to amendment sought by GTC in their original submission	Accept in part
S222.060	Environmental Defence Society Inc.	FS9.241	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Not stated	Disallow	Not stated	Reject

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S222.060	Environmental Defence Society Inc.	FS23.216	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S222.060	Environmental Defence Society Inc.	FS27.952	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept
S222.060	Environmental Defence Society Inc.	FS50.047	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	NZCF opposes the submission on the basis that no rationale or analysis is provided to support a more stringent activity status, including in terms of how a change in activity status is appropriate or necessary to give effect to the NPSFM.	Disallow	Not stated	Reject
S222.061	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Amend		To give effect to NPSFM and comply with RMA.	Amend as consequence of changes to Rule WH.20		Reject
S222.061	Environmental Defence Society Inc.	FS9.242	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
S222.061	Environmental Defence Society Inc.	FS23.217	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher	Allow	Support the whole of the submission and all relief sought unless otherwise	Reject

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								order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	
S222.061	Environmental Defence Society Inc.	FS27.953	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S222.061	Environmental Defence Society Inc.	FS50.048	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	NZCF opposes the submission because the relief sought is unclear and on the basis that no rationale or analysis is provided in terms of how an amendment is appropriate or necessary to give effect to the NPSFM.	Disallow	Not stated	Accept
S222.062	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Support		Gives effect to NPSFM.	Not stated		No recommendation
S222.062	Environmental Defence Society Inc.	FS9.243	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	Not stated	Disallow	Not stated	No recommendation
S222.062	Environmental Defence Society Inc.	FS23.218	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										inconsistent with Forest & Bird's submission points and specific relief.	
S222.062	Environmental Defence Society Inc.	FS27.954	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Waitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S222.091	Environmental Defence Society Inc.			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend		To give effect to NPSFM.	Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting		Reject
S222.091	Environmental Defence Society Inc.	FS9.272	New Zealand Farm Forestry Association (NZFFA)	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Not stated	Disallow	Not stated	Accept
S222.091	Environmental Defence Society Inc.	FS23.247	Forest & Bird	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S222.091	Environmental Defence Society Inc.	FS27.983	Manor Park and Haywards Residents	General comments	Policy P.P26: Achieving reductions in sediment		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Community Incorporate ("MPHRCI")		discharges from plantation forestry.			and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.091	Environmental Defence Society Inc.	FS50.049	New Zealand Carbon Farming Group ('NZCF')	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	NZCF does not support the submission on the basis that the relief sought is not clear in terms of the scope of restrictions sought and no consideration is given to how the relief relates to the NESCF.	Disallow	Not stated	Accept
S222.099	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.	Amend		To give effect to NPSFM and comply with RMA.	Make a controlled activity or amend permitted activity standards to avoid sedimentation of receiving waterbodies and the coastal marine area.		Accept in part
S222.099	Environmental Defence Society Inc.	FS9.280	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept in part
S222.099	Environmental Defence Society Inc.	FS20.014	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Oppose	Refer to Transpower's submission on rule P.R16. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid. However, if the decision requested by Transpower in its submission on rule P.R16 is allowed, then Transpower would adopt a neutral position on this submission point.	Disallow	Transpower opposes the request to change activity status of rule P.R16 from permitted to controlled.	Accept in part
S222.099	Environmental Defence Society Inc.	FS23.255	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.099	Environmental Defence Society Inc.	FS27.991	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	submission points and specific relief. Not stated	Accept in part
S222.099	Environmental Defence Society Inc.	FS47.369	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Oppose	Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), considers permitted activity status is appropriate. Meridian also considers the limits in operative Rule R104 or an area limit for regionally significant infrastructure consistent with the limits in Rule R104 is appropriate;	Disallow	Disallow S222.099.	Accept in part
S222.100	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		To give effect to NPSFM and comply with RMA.	Make a discretionary or restricted discretionary activity to ensure the avoidance of adverse sedimentation effects associated with the clearance.		Reject
S222.100	Environmental Defence Society Inc.	FS9.281	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Not stated	Disallow	Not stated	Accept
S222.100	Environmental Defence Society Inc.	FS20.015	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Refer to Transpower's submission on rule P.R16. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid, where this breaches the standards in rule P.R16. However, if the decision requested by Transpower in its submission on rule P.R16 is	Disallow	Transpower opposes the request to change activity status of rule P.R17 from controlled to discretionary or	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								allowed, then Transpower would adopt a neutral position on this submission point.		restricted discretionary.	
S222.100	Environmental Defence Society Inc.	FS23.256	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S222.100	Environmental Defence Society Inc.	FS27.992	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S222.100	Environmental Defence Society Inc.	FS47.378	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule P.R17. Meridian considers the controlled activity default provision is appropriate;	Disallow	Disallow S222.100, allow general vegetation clearance as a permitted activity with limits matching those in operative Rule R104 and make consequential amendments to Rule P.R17 to increase the threshold area to match Rule P.R16.	Accept
S222.101	Environmental Defence Society Inc.			8 Whaitua Te	Rule P.R18: Vegetation	Amend		To give effect to NPSFM and comply with RMA.	"Vegetation clearance" is defined to not include commercial forest trees. Need to clarify whether Rules WH.R17 - 20		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	clearance – discretionary activity.				apply to commercial forestry activities. The "Note" in Rule WH R19 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		
S222.101	Environmental Defence Society Inc.	FS9.282	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept in part
S222.101	Environmental Defence Society Inc.	FS23.257	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept in part
S222.101	Environmental Defence Society Inc.	FS27.993	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S222.102	Environmental Defence Society Inc.			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Amend		To give effect to NPSFM and comply with RMA.	Make a discretionary or restricted discretionary activity		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.102	Environmental Defence Society Inc.	FS9.283	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Not stated	Disallow	Not stated	Reject
S222.102	Environmental Defence Society Inc.	FS23.258	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S222.102	Environmental Defence Society Inc.	FS27.994	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept
S222.102	Environmental Defence Society Inc.	FS50.050	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	NZCF opposes the submission on the basis that no rationale or analysis is provided to support a more stringent activity status, including in terms of how a change in activity status is appropriate or necessary to give effect to the NPSFM.	Disallow	Not stated	Reject
S222.103	Environmental Defence Society Inc.			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Amend		To give effect to NPSFM and comply with RMA.	Amend as a consequence of changes to Rule WH.20		Reject
S222.103	Environmental Defence Society Inc.	FS9.284	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.103	Environmental Defence Society Inc.	FS23.259	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S222.103	Environmental Defence Society Inc.	FS27.995	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S222.103	Environmental Defence Society Inc.	FS50.051	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	NZCF opposes the submission because the relief sought is unclear and on the basis that no rationale or analysis is provided in terms of how an amendment is appropriate or necessary to give effect to the NPSFM.	Disallow	Not stated	Accept
S222.104	Environmental Defence Society Inc.			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Support		Gives effect to NPSFM.	Not stated		No recommendation
S222.104	Environmental Defence Society Inc.	FS9.285	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	Not stated	Disallow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.104	Environmental Defence Society Inc.	FS23.260	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	No recommendation
S222.104	Environmental Defence Society Inc.	FS27.996	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S222.137	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Support		Gives effect to the NPSFM.	Not stated		No recommendation
S222.137	Environmental Defence Society Inc.	FS9.318	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Oppose	Not stated	Disallow	Not stated	No recommendation
S222.137	Environmental Defence Society Inc.	FS23.293	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										Forest & Bird's submission points and specific relief.	
S222.137	Environmental Defence Society Inc.	FS27.1029	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S222.138	Environmental Defence Society Inc.			##	A Purposes of the Erosion and Sediment Management Plan	Support		Gives effect to the NPSFM.	Not stated		No recommendation
S222.138	Environmental Defence Society Inc.	FS9.319	New Zealand Farm Forestry Association (NZFFA)	##	A Purposes of the Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S222.138	Environmental Defence Society Inc.	FS23.294	Forest & Bird	##	A Purposes of the Erosion and Sediment Management Plan		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	No recommendation
S222.138	Environmental Defence Society Inc.	FS27.1030	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	##	A Purposes of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.139	Environmental Defence Society Inc.			2 Interpretation	B Management objectives	Support		Gives effect to the NPSFM.	Not stated		No recommendation
S222.139	Environmental Defence Society Inc.	FS9.320	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	B Management objectives		Oppose	Not stated	Disallow	Not stated	No recommendation
S222.139	Environmental Defence Society Inc.	FS23.295	Forest & Bird	2 Interpretation	B Management objectives		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird’s submission points and specific relief.	No recommendation
S222.139	Environmental Defence Society Inc.	FS27.1031	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	2 Interpretation	B Management objectives		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.140	Environmental Defence Society Inc.			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Support		Gives effect to the NPSFM.	Not stated		No recommendation
S222.140	Environmental Defence Society Inc.	FS9.321	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S222.140	Environmental Defence Society Inc.	FS23.296	Forest & Bird	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird’s submission points and specific relief.	No recommendation
S222.140	Environmental Defence Society Inc.	FS27.1032	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.141	Environmental Defence Society Inc.			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Support		Gives effect to the NPSFM.	Not stated		No recommendation
S222.141	Environmental Defence Society Inc.	FS9.322	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S222.141	Environmental Defence Society Inc.	FS23.297	Forest & Bird	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	No recommendation
S222.141	Environmental Defence Society Inc.	FS27.1033	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.142	Environmental Defence Society Inc.			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Oppose		Considers GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk.	Not stated		No recommendation
S222.142	Environmental Defence Society Inc.	FS9.323	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S222.142	Environmental Defence Society Inc.	FS23.298	Forest & Bird	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	No recommendation
S222.142	Environmental Defence Society Inc.	FS27.1034	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S222.143	Environmental Defence Society Inc.			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and	Support		Gives effect to NPSFM.	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					Sediment Management Plan.						
S222.143	Environmental Defence Society Inc.	FS9.324	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Oppose	Not stated	Disallow	Not stated	No recommendation
S222.143	Environmental Defence Society Inc.	FS23.299	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	No recommendation
S222.143	Environmental Defence Society Inc.	FS27.1035	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S222.144	Environmental Defence Society Inc.			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Oppose		Considers GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk.	Not stated		No recommendation
S222.144	Environmental Defence Society Inc.	FS9.325	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.144	Environmental Defence Society Inc.	FS23.300	Forest & Bird	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	No recommendation
S222.144	Environmental Defence Society Inc.	FS27.1036	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S225.017	Upper Hutt City Council			General comments	General comments - plantation forestry	Amend		Not stated	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.		Accept in part
S225.017	Upper Hutt City Council	FS25.008	Guildford Timber Company Limited, Silverstream Forest Limited and the	General comments	General comments - plantation forestry		Support	Submission is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF	Allow	Delete or amend rules surrounding plantation forestry trying to provide a higher level of protection than	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Goodwin Estate Trust.							currently allowed under NES-CF	
S225.017	Upper Hutt City Council	FS23.845	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S225.028	Upper Hutt City Council			2 Interpretation	Afforestation	Support		Not stated	Retain as notified		Accept in part
S225.028	Upper Hutt City Council	FS23.856	Forest & Bird	2 Interpretation	Afforestation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S225.033	Upper Hutt City Council			2 Interpretation	Erosion and sediment management plan	Amend		Notes reference to "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" is identified in stabilisation definition but not in this definition or the schedules.	Seeks inclusion reference to "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" for consistency across plan.		Reject
S225.033	Upper Hutt City Council	FS16.048	Woodridge Holdings Ltd	2 Interpretation	Erosion and sediment management plan		Not stated	Consistent application of a single set of standards is necessary to ensure a consistent approach to this issue.	Allow	The "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" should be consistently referred to.	Reject
S225.033	Upper Hutt City Council	FS23.861	Forest & Bird	2 Interpretation	Erosion and sediment management plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S225.038	Upper Hutt City Council			General comments	Highest erosion risk land (woody vegetation)	Amend		Support as mapped areas are consistent with areas identified as high slope in Council's Proposed Plan Change 47.	Seek consistency with District Council hazard mapping.		Reject
S225.038	Upper Hutt City Council	FS23.866	Forest & Bird	General comments	Highest erosion risk land (woody vegetation)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S225.090	Upper Hutt City Council			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers policy appears to conflict with requirements of NES-CF.	Delete policy.		Reject
S225.090	Upper Hutt City Council	FS23.918	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										with Forest & Bird's submission points and specific relief.	
S225.090	Upper Hutt City Council	FS50.147	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Reject
S225.105	Upper Hutt City Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Considers this does not appear to align with requirements of NESCF.	Delete rule.		Reject
S225.105	Upper Hutt City Council	FS23.933	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S225.105	Upper Hutt City Council	FS50.148	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Reject
S225.106	Upper Hutt City Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Oppose		Considers this does not appear to align with requirements of NESCF.	Delete rule.		Accept
S225.106	Upper Hutt City Council	FS23.934	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S225.106	Upper Hutt City Council	FS50.149	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept
S225.122	Upper Hutt City Council			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Amend		Considers this should also refer to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).	Include reference to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021) for consistency across plan.		Reject
S225.122	Upper Hutt City Council	FS23.950	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S225.123	Upper Hutt City Council			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Amend		Considers this should also refer to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).	Include reference to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021) for consistency across plan.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S225.123	Upper Hutt City Council	FS23.951	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S225.128	Upper Hutt City Council			13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.	Oppose		Not stated	Not stated		No recommendation
S225.128	Upper Hutt City Council	FS11.028	GILLIES GROUP MANAGEMENT LTD	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.		Support	Agrees that the erosion prone maps need to be amended to align with district council hazard mapping.	Allow	Support submission point in full	No recommendation
S225.128	Upper Hutt City Council	FS23.956	Forest & Bird	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S237.001	John Turkington Limited			2 Interpretation	General comments - overall	Not Stated		Supports submissions from China National Forestry Group, Forest Enterprises and Juken New Zealand	Not stated		No recommendation
S237.002	John Turkington Limited			2 Interpretation	General comments - current legislation	Not Stated		Concerned lack of evidence and justification for forestry restrictions and how NES-CF controls are insufficient for managing forestry and associated effects.	Not stated		No recommendation
S237.002	John Turkington Limited	FS50.076	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S237.003	John Turkington Limited			2 Interpretation	General comments - current legislation	Not Stated		Considers PC1 duplicated existing controls under NES-CF including use of erosion mapping and management plan requirements.	Not stated		No recommendation
S237.003	John Turkington Limited	FS50.077	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S237.004	John Turkington Limited			2 Interpretation	General comments - economic cost/impact	Not Stated		Concerns with lack of evidence provided by GW on environmental effects from forestry.	Not stated		No recommendation
S237.004	John Turkington Limited	FS50.078	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - economic cost/impact		Support	NZCF supports the submission and similarly considers that the provisions relating to forestry must be supported by evidence.	Allow	Not stated	No recommendation
S237.005	John Turkington Limited			2 Interpretation	General comments - current legislation	Not Stated		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 the PC1 consented regime proposed.	Not stated		No recommendation
S237.005	John Turkington Limited	FS50.079	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S237.006	John Turkington Limited			General comments	General comments - water bodies	Not Stated		Supports principles of Te Mana o te Wai. 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.	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S237.007	John Turkington Limited			General comments	General comments - target attribute states	Not Stated		Considers any rule, policy or objective of PC1 intended to give effect to a specified TAS must demonstrate it is necessary. Suggests scientific data supports that current forest landuse, controls, and management practices, as regulated under the NES-CF, are sufficient to achieve the desired target attribute state for freshwater clarity Notes the Section 32 report and scientific evidence (Freshwater quality monitoring technical report) that 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. 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. 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.	Not stated		No recommendation
S237.008	John Turkington Limited			2 Interpretation	General comments - overall	Not Stated		Notes importance that policies, objectives or rules related to commercial forestry are supported by appropriate empirical evidence. Considers the collaboration reports suggests no scientific relationship between erosion risk, sediment delivery (connectivity), sediment yield, or receiving environment target state attributes, such as visual clarity. Question how 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 GWRC having given due consideration to existing literature on connectivity and sediment yield. 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 and do not consider management practices beyond erosion risk, and are already adequately controlled for within NES-CF. Considers the Section 32 Report, does not provide evidence or justify that existing commercial forestry contributes to sedimentation and current forestry management practices and the regulatory framework are not adequate to address the improvements needed. 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.	Not stated		No recommendation
S237.008	John Turkington Limited	FS50.080	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S237.009	John Turkington Limited			General comments	General comments - water quality improvements	Not Stated		Seeks rules must be consistent with existing operating framework of NES-CF. Notes the sediment discharge provisions of the NES-CF form an important component of the permitted activity	Seeks rules must be consistent with existing operating framework of NES-CF.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								standards for forestry earthworks under the current regulatory regime, and apply irrespective of the identified erosion susceptibility of the land. Considers Council has overlooked role of water quality standards (namely permitted activity discharges) already provided for by NES-CF. Questions if further deviation from standards currently expressed by the National Standards is necessary or defensible. Considers as well as unnecessarily overriding existing discharge standards of NES-CF, PC1 is also duplicating existing requirements of National Standards for forestry operations to have a management plan address erosion and sedimentation from land disturbing activities. Considers as well as unnecessarily overriding existing discharge standards of NES-CF, PC1 is also duplicating existing requirements of National Standards for forestry operations to have a management plan address erosion and sedimentation from land disturbing activities. Considers 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. Also notes no evidence provided by Council that existing Forestry Earthworks and Harvest Management Plans within NES-CF is insufficient for managing forestry activities.			
S237.009	John Turkington Limited	FS25.015	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	General comments	General comments - water quality improvements		Support	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP are not considered necessary to implement the NPS-FM or to achieve the purpose of the RMA	Allow	Rules to be consistent with NES-CF	Accept in part
S237.009	John Turkington Limited	FS50.081	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - water quality improvements		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. That said, NZCF notes that Rules should not duplicate a National Environmental Standard.	Allow	Not stated	Accept in part
S237.010	John Turkington Limited			2 Interpretation	General comments - current legislation	Not Stated		Notes PC1 must be implemented in accordance with statutory provisions. Notes 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. Concerned current provisions seek to replace the current permitted activity approach of National Instruments leading to regulatory inconsistency. 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, refers to Section 32 (4) of RMA. Submitter considers none of the proposed changes necessary, or validly justified. Considers 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. Suggests proposed or amended	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								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 that apply to this type of plan change.			
S237.010	John Turkington Limited	FS50.082	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S237.011	John Turkington Limited			2 Interpretation	General comments - current legislation	Not Stated		Considers NES-CF sufficient for managing forestry activities and notes Council have not provided any evidence contrary to this. Seeks Council should 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. 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 NPS-FM in order to apply a more stringent rule.	Seeks Council provide evidence that NES-CF is insufficient to meet the objectives for water quality, ecosystem health and mana whenua values before progressing with PC1. Alternatively, Seeks Council should utilise stringency ability under NES-CF to develop more stringent rules for specific controls.		Accept in part
S237.011	John Turkington Limited	FS25.016	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	2 Interpretation	General comments - current legislation		Support in part	Submission is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF	Allow in part	Council to provide evidence that NES-CF is insufficient to meet the objectives of water quality, ecosystem health and mana whenua values before progressing with PC1	Accept in part
S237.011	John Turkington Limited	FS50.083	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S238.001	Greater Wellington Regional Council			2 Interpretation	General comments - definitions	Amend		Notes the NES-PF has been replaced by the NES-CF. Amend in PC1 provisions to replace NES-PF with NES-CF.	Replace plantation forestry with commercial forestry		Accept
S238.001	Greater Wellington Regional Council	FS23.304	Forest & Bird	2 Interpretation	General comments - definitions		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S238.003	Greater Wellington Regional Council			2 Interpretation	General comments - definitions	Amend		Amend to update PC1 to NES-CF that replaced NES-PF after PC1 was notified	Insert new definition as follows: Commercial forestry has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017		Accept in part
S238.003	Greater Wellington Regional Council	FS23.306	Forest & Bird	2 Interpretation	General comments - definitions		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										submission points and specific relief.	
S238.007	Greater Wellington Regional Council			8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser	Amend		Notes the legislation reference needs updating	Amend as follows: Registered forestry adviser Means a person registered under s63Q or s63T of Forests (Regulation of Log Traders and Forestry Advisers) Amendment Act 1949 2020 that who is authorised to give advice that relates to:		Reject
S238.007	Greater Wellington Regional Council	FS23.310	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S238.014	Greater Wellington Regional Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Amend		Notes reference is to the incorrect regulation	Amend as follows: Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2020 2017		Accept in part
S238.014	Greater Wellington Regional Council	FS23.317	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept in part
S238.015	Greater Wellington Regional Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Amend		Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: Afforestation, harvesting, replanting, earthworks, or mechanical land preparation for commercial forestry,...		Accept
S238.015	Greater Wellington Regional Council	FS23.318	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S238.015	Greater Wellington Regional Council	FS50.063	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	Allow	Not stated	Accept
S238.016	Greater Wellington Regional Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Amend		Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: Afforestation, harvesting, replanting, earthworks, or mechanical land preparation for commercial forestry,...		Reject
S238.016	Greater Wellington Regional Council	FS23.319	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S238.016	Greater Wellington Regional Council	FS50.064	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	Allow	Not stated	Reject
S238.017	Greater Wellington Regional Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Amend		Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: Afforestation, harvesting, replanting, earthworks, or mechanical land preparation for commercial forestry,...		Reject
S238.017	Greater Wellington Regional Council	FS23.320	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S238.017	Greater Wellington Regional Council	FS50.065	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	Allow	Not stated	Reject
S238.026	Greater Wellington Regional Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Amend		Notes reference is to the incorrect regulation	Amend as follows: Resource Management (National Environmental Standards for Freshwater Commercial Forestry) Regulations 2020 2017		Accept in part
S238.026	Greater Wellington Regional Council	FS23.329	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept in part
S238.027	Greater Wellington Regional Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Amend		Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: The use of land for afforestation, harvesting, replanting, earthworks, or mechanical land preparation for plantation commercial forestry,...		Accept
S238.027	Greater Wellington Regional Council	FS23.330	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S238.027	Greater Wellington Regional Council	FS50.066	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	Allow	Not stated	Accept
S238.028	Greater Wellington Regional Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Amend		Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: The use of land for afforestation, harvesting, replanting, earthworks, or mechanical land preparation for plantation commercial forestry,...		Reject
S238.028	Greater Wellington	FS23.331	Forest & Bird	9 Te Awarua-o-	Rule P.R20: Plantation forestry – discretionary activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Regional Council			Porirua Whaitua						unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	
S238.028	Greater Wellington Regional Council	FS50.067	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	Allow	Not stated	Reject
S238.029	Greater Wellington Regional Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Amend		Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: Afforestation, replanting, and associated earthworks, or mechanical land preparation for plantation commercial forestry,...		Reject
S238.029	Greater Wellington Regional Council	FS23.332	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S238.029	Greater Wellington Regional Council	FS50.068	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	Allow	Not stated	Reject
S240.057	Porirua City Council			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Support		Supports reduction of sediment discharges from forestry.	Retain as notified.		Reject
S240.057	Porirua City Council	FS9.154	New Zealand Farm Forestry Association (NZFFA)	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Not stated	Disallow	Not stated	Accept
S240.074	Porirua City Council			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.	Amend		Supports in principle the reduction of sediment discharges from forestry but considers there is a need to provide for the creation of firebreaks as a permitted activity to allow people to defend their homes and property from the risk of wildfires.	Rule P.R16: Vegetation clearance on highest erosion risk land – permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, or (iii) for the creation or maintenance of a firebreak; and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.		Reject
S240.074	Porirua City Council	FS9.171	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept
S240.074	Porirua City Council	FS36.017	Wellington City Council	8 Whaitua Te	Rule P.R16: Vegetation		Support	Consistent with Wellington City Council's position on the matter.	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	clearance on highest erosion risk land – permitted activity.						
S240.075	Porirua City Council			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Support		Supports reduction of sediment discharges from forestry.	Retain as notified		Reject
S240.075	Porirua City Council	FS9.172	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Not stated	Disallow	Not stated	Accept
S240.075	Porirua City Council	FS47.379	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	For the reasons explained above, Meridian considers Rule P.R17 requires amendment;	Disallow	Disallow S240.075.	Accept
S240.076	Porirua City Council			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Support		Supports reduction of sediment discharges from forestry.	Retain as notified		Reject
S240.076	Porirua City Council	FS9.173	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
S240.076	Porirua City Council	FS47.386	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Disallow	Disallow S240.076 and reinstate operative NRP Rule R106.	Accept
S240.077	Porirua City Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Support		Supports reduction of sediment discharges from forestry.	Retain as notified		Reject
S240.077	Porirua City Council	FS9.174	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Not stated	Disallow	Not stated	Accept
S240.078	Porirua City Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Support		Supports reduction of sediment discharges from forestry.	Retain as notified		Reject
S240.078	Porirua City Council	FS9.175	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
S240.079	Porirua City Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Support		Supports reduction of sediment discharges from forestry.	Retain as notified		Reject
S240.079	Porirua City Council	FS9.176	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	Not stated	Disallow	Not stated	Accept
S248.004	Ara Poutama Aotearoa the Department of Corrections (S248)			General comments	General comments - maps	Not Stated		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. Considers maps should be amended to only identify	Not stated		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								cohesive areas being subject to the rules. In relation to policies, rules, and schedules in relation to plantation forestry, submitter suggests these could be refined to enable plantation forestry operations to continue, particularly where it provides benefits for minimising soil erosion and carbon sequestration. Considers much of Schedule 34 duplicates statutory requirements contained in other documents (particularly the NES-CF) and considers Schedule 34 should be part of a Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.			
S248.004	Ara Poutama Aotearoa the Department of Corrections	FS50.005	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - maps		Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 ("NESPF").	Allow	Not stated	Accept in part
S248.006	Ara Poutama Aotearoa the Department of Corrections			General comments	General comments - fresh water	Amend		Notes inappropriate use of the freshwater planning process for vegetation clearance and earthworks provisions. Provisions for vegetation clearance and the permitted activity rule for earthworks, have been included in this freshwater planning instrument. Considers this is an inappropriate use of the freshwater planning instrument as principal purpose of these provisions is to control the use of land for the purpose of soil conservation. Also considers none of these rules manage discharges to freshwater.	Seeks provisions be reallocated to the Part 1 Schedule 1 planning instrument.		Reject
S248.011	Ara Poutama Aotearoa the Department of Corrections			General comments	General comments - plantation forestry	Not Stated		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 rule (and is not an innominate discretionary activity).	Amendments to the permitted activity rule for vegetation clearance on highest erosion risk land (woody vegetation) to ensure that vegetation clearance less than 200m2 is clearly provided for under the rule (and is not an innominate discretionary activity).		Accept in part
S248.015	Ara Poutama Aotearoa the Department of Corrections			General comments	Highest erosion risk land (woody vegetation)	Neutral		Notes their submission on the provisions and maps that relate to this definition.	Retain as notified (noting the submission points on the maps and provision).		Reject
S248.025	Ara Poutama Aotearoa the Department of Corrections			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Amend		Questions feasibility of point (c) of this policy with regard to disparate areas of high erosion risk plantation forestry land identified in Map 92. Notes under this policy, it appears harvesting plantation forestry and replanting in pine is to be avoided. Noting the incentives for replanting provided in section B3 of Schedule 27 (relating to undertaking programmes to actively support revegetation of and sediment management on highest erosion risk land (plantation forestry)), the practicality of replanting in natives can be challenging, and may result in forestry owners not replanting the land at all. Considers replanting with pine still provides benefits for stabilising erosion-prone land and considers this policy could be counterproductive. Considers this point would appear to be contrary to the Emissions Trading Scheme, which requires forests are registered to the scheme are replanted after harvesting, as they provide important carbon sequestration benefits. Submitter seeks that point (c) of this policy be deleted and notes this policy would be subject to consequential amendments resulting from the relief it is seeking on Schedule 34.	Amend policy as follows: Policy WH.P28 Achieving reductions in sediment discharges from plantation forestry Reduce discharges of sediment from plantation forestry by: (a) identifying highest erosion risk land (plantation forestry), and (b) improving management of plantation forestry by requiring erosion and sediment management plans to be prepared and complied with., and (c) requiring that on highest erosion risk land (plantation forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forest.		Accept in part
S248.025	Ara Poutama Aotearoa the	FS50.006	New Zealand Carbon	8 Whaitua Te	Policy WH.P28: Achieving reductions		Support	NZCF generally supports the submission and similarly seeks the deletion of clause (c) for the reasons given	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Department of Corrections		Farming Group ('NZCF')	Whanganui-a-Tara	in sediment discharges from plantation forestry.			in the submission and also for the reasons given in NZCF's primary submission on Policy WH:P28.			
S248.038	Ara Poutama Aotearoa the Department of Corrections			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Neutral		Submitter has neutral position on rule, subject to relief sought on Schedule 34.	Retain as notified (noting the submission points on Schedule 34).		Accept in part
S248.039	Ara Poutama Aotearoa the Department of Corrections			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Neutral		Submitter has neutral position on rule, subject to relief sought on Schedule 34.	Retain as notified (noting the submission points on Schedule 34).		Accept in part
S248.040	Ara Poutama Aotearoa the Department of Corrections			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Amend		Seeks clarification as to whether prohibition on “earthworks” and “mechanical land preparation” in rule only applies to “afforestation” as defined by NES-CF (i.e. this rule only applies to land where no commercial forestry or harvesting has occurred within the past 5 years), or whether prohibition on “earthworks” and “mechanical land preparation” applies to all new plantation forestry, including re-establishment of recently harvested forests. Considers if rule only applies to new forests as per the definition of “afforestation” in the NES-CF, submitter considers this rule is reasonable. Notes if rule applies to re-establishment of recently harvested forests, submitter considers the Prohibited activity status for this rule is unnecessarily onerous, and evidence in the Section 32 report does not support a Prohibited activity status. Considers there should be a consent pathway for re-establishing plantation forests after harvesting for reasons set out in its requested relief for Policy WH.P28.	Clarify whether the rule applies to “afforestation” only as defined by the NES-CF, or whether the rule applies to all plantation forestry, including re-establishment. If the rule applies to all plantation forestry including re-establishment, amend the rule to enable a consent pathway for re-establishing plantation forests after harvesting.		Reject
S248.040	Ara Poutama Aotearoa the Department of Corrections	FS46.045	Waste Management NZ Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										offsetting or compensation (which may include financial contributions) as to offset adverse effects from residual stormwater contaminants, and	
S248.040	Ara Poutama Aotearoa the Department of Corrections	FS50.008	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support in part	Subject to the relief sought in NZCF's primary submission, NZCF supports request for clarification of the scope of Rule WH.R22 so that it is clear what activities are being regulated by the Rule.	Allow in part	Not stated	Reject
S248.049	Ara Poutama Aotearoa the Department of Corrections			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend		Questions feasibility of point (c) of this policy with regard to disparate areas of high erosion risk plantation forestry land identified in Map 92. Notes under this policy, it appears harvesting plantation forestry and replanting in pine is to be avoided. Noting the incentives for replanting provided in section B3 of Schedule 27 (relating to undertaking programmes to actively support revegetation of and sediment management on highest erosion risk land (plantation forestry)), the practicality of replanting in natives can be challenging, and may result in forestry owners not replanting the land at all. Considers replanting with pine still provides benefits for stabilising erosion-prone land and considers this policy could be counterproductive. Considers this point would appear to be contrary to the Emissions Trading Scheme, which requires forests are registered to the scheme are replanted after harvesting, as they provide important carbon sequestration benefits. Submitter seeks that point (c) of this policy be deleted and notes this policy would be subject to consequential amendments resulting from the relief it is seeking on Schedule 34.	Policy P.P26 Achieving reductions in sediment discharges from plantation forestry Reduce discharges of sediment from plantation forestry by: (a) identifying highest erosion risk land (plantation forestry), and (b) improving management of plantation forestry by requiring erosion and sediment management plans to be prepared and complied with., and (c) requiring that on highest erosion risk land (plantation forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forest.		Accept in part
S248.049	Ara Poutama Aotearoa the Department of Corrections	FS50.009	New Zealand Carbon Farming Group ('NZCF')	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Support	NZCF generally supports the submission and similarly seeks the deletion of clause (c) for the reasons given in the submission and also for the reasons given in NZCF's primary submission on Policy P:P26.	Allow	Not stated	Accept in part
S248.062	Ara Poutama Aotearoa the Department of Corrections			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Neutral		Submitter has neutral position on rule, subject to relief sought on Schedule 34.	Retain as notified (noting the submission points on Schedule 34).		Accept in part
S248.063	Ara Poutama Aotearoa the Department of Corrections			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Amend		Seeks clarification as to whether prohibition on "earthworks" and "mechanical land preparation" in rule only applies to "afforestation" as defined by NES-CF (i.e. this rule only applies to land where no commercial forestry or harvesting has occurred within the past 5 years), or whether prohibition on "earthworks" and "mechanical land preparation" applies to all new plantation forestry, including re-establishment of recently harvested forests. Considers if rule only applies to new forests as per the definition of "afforestation" in the NES-CF, submitter considers this rule is reasonable. Notes if rule applies to re-establishment of recently harvested forests, submitter considers the Prohibited activity status for this rule is unnecessarily onerous, and evidence in the Section 32 report does not support a Prohibited activity status. Considers there should be a consent pathway for re-establishing plantation forests after harvesting for reasons set out in its requested relief for Policy WH.P28.	Clarify whether the rule applies to "afforestation" only as defined by the NES-CF, or whether the rule applies to all plantation forestry, including re-establishment. If the rule applies to all plantation forestry including re-establishment, amend the rule to enable a consent pathway for re-establishing plantation forests after harvesting.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S248.063	Ara Poutama Aotearoa the Department of Corrections	FS50.011	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support in part	Subject to the relief sought in NZCF's primary submission, NZCF supports request for clarification of the scope of Rule P.R22 so that it is clear what activities are being regulated by the Rule.	Allow in part	Not stated	Reject
S248.075	Ara Poutama Aotearoa the Department of Corrections			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose		Opposes schedule being included within freshwater planning instrument, as purpose of the schedule is to manage land use for the purposes of soil conservation. Seeks schedule be reallocated to the Part 1 Schedule 1 planning instrument.	Reallocate schedule so that it is of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		Reject
S248.076	Ara Poutama Aotearoa the Department of Corrections			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Amend		Considers terms "critical source areas" and "hotspots for sediment loss to surface water" under clause (b)(ix) are unclear, and should be defined so that it is clear to plan users what these terms mean, and what is sought to be mapped under this clause.	Define the terms "critical source areas" and "hotspots for sediment loss to surface water" in relation to Schedule 33 C1(b)(ix).		Reject
S248.077	Ara Poutama Aotearoa the Department of Corrections			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Amend		Considers terms "critical source areas" and "hotspots for sediment loss to surface water" under clause (b)(ix) are unclear, and should be defined so that it is clear to plan users what these terms mean, and what is sought to be mapped under this clause.	Define the terms "critical source areas" and "hotspots for sediment loss to surface water" in relation to Schedule 33 C1(b)(ix).		Reject
S248.078	Ara Poutama Aotearoa the Department of Corrections			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose		Opposes schedule being included within freshwater planning instrument, as purpose of the schedule is to manage land use for the purposes of soil conservation. Seeks schedule be reallocated to the Part 1 Schedule 1 planning instrument.	Reallocate the schedule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		Reject
S248.079	Ara Poutama Aotearoa the Department of Corrections			##	A Purpose of the Erosion and Sediment Management Plan	Amend		In relation to clause B(2), submitter considers the term "avoid" is a very high and potentially unachievable threshold, and should be replaced with "minimise". Contained within the same clause, notes it is unclear which state the term "natural state" refers to, particularly where existing land uses have occurred for some time. In terms of measuring whether a plantation forest can achieve the same risk of sediment loss to water compared to a natural state, sediment loss from a plantation forest will vary over the course of its 25 year span. Submitter is neutral on clause B3, which aligns with its positions on Rules WH.R20 and P.R19, but questions the feasibility of clause B4. The practicality of replanting land with natives after harvesting a plantation forest can pose challenges and replanting with pine still provides benefits for stabilising erosion-prone land. Notes the Emissions Trading Scheme requires that forests registered to the scheme are replanted, as they provide important carbon sequestration benefits. Seeks the term "revegetation" under clause B3(1)(a) be clarified to include a range of vegetation types, including plantation forestry. Regarding the required contents, certification, and amendment of erosion and sediment management plans, the provisions in sections C1, C2, and D of this schedule appear to be a duplication of the requirements in NES-CF Schedule 4 for forestry earthworks management plans and the Regional Council's earthworks and sediment control management plan guidelines. Questions why these requirements need to be duplicated and suggests these be removed. Notes references to these requirements and guidelines can be inserted if considered necessary.	Amend clause B(2) to clarify the term "revegetation", and reword as follows: 2. avoid minimise any increase in risk of loss of sediment to water relative to the risk of loss that exists from the land in a natural state, ... Retain clause B(3) as notified. Delete clause B(4). Delete sections C1, C2, and D.		Accept in part
S248.083	Ara Poutama Aotearoa the Department of Corrections			13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	Amend		Parts of the Arohata Prison site are located near land that is mapped as "Highest erosion risk land (Plantation forestry)" in Map 91. Notes the mapping of "Highest erosion risk land (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	Amend Map 92, and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk land (Plantation Forestry)".		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								questions the value of regulating small, incohesive areas of plantation forestry. Considers 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 plantation forestry, and remove incohesive or isolated areas.			
S248.085	Ara Poutama Aotearoa the Department of Corrections			13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.	Amend		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. 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. Considers 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, pasture, and plantation forestry, and remove incohesive or isolated areas.	Amend Maps 93, 94, and 95 and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation Forestry)".		Accept in part
S248.086	Ara Poutama Aotearoa the Department of Corrections			13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Amend		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. 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. Considers 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, pasture, and plantation forestry, and remove incohesive or isolated areas.	Amend Maps 93, 94, and 95 and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation Forestry)".		Accept in part
S25.001	Robin Chesterfield			2 Interpretation	General comments - overall	Not Stated		Supports the National New Zealand Farm Forestry Association and the Wellington branch of the New Zealand Farm Forestry Association Submissions	Not stated		No recommendation
S25.002	Robin Chesterfield			2 Interpretation	General comments - overall	Not Stated		Concerned rules governing forestry in PC1 would render interest in land incapable of reasonable use	Not stated		No recommendation
S25.003	Robin Chesterfield			2 Interpretation	General comments - economic cost/impact	Not Stated		Believes costs and restrictions of PC1 would make their forestry operation uneconomic and limit future income	Not stated		No recommendation
S254.017	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.	Oppose		Concerns regarding the area considered to be highest erosion risk and how these were mapped, noting it appears the maps were drawn based on a desktop assessment of what is probably LIDAR data and aerial photographs. Considers this is unreliable and unsuitable for a regional plan. Notes there is no limit on area so long as you are clearing pest plants but there is no definition of this. considers the clearance of non-pest plants being limited to 200m2 as a controlled activity under R17 is too low given earthwork are permitted up to 3000m2 .	Delete the map		Accept in part
S254.017	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS47.370	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.		Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further	Allow	Allow S254.017 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								submission point seeking retention of operative NRP rules(S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;		increase the area permitted to be cleared to be consistent with operative Rule R104.	
S254.018	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Concerns regarding the area considered to be highest erosion risk and how these were mapped, noting it appears the maps were drawn based on a desktop assessment of what is probably LIDAR data and aerial photographs. Considers this is unreliable and unsuitable for a regional plan. Notes there is no limit on area so long as you are clearing pest plants but there is no definition of this. considers the clearance of non-pest plants being limited to 200m2 as a controlled activity under R17 is too low given earthwork are permitted up to 3000m2 .	Delete the map The threshold for controlled activity status be increased to 3000m2.		Accept in part
S254.018	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS47.380	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support in part	Meridian agrees the controlled activity threshold (and therefore also the permitted activity limit) is too low and considers it should be amended to match the operative NRP rules (R104 and R106 in particular);	Allow in part	Allow S254.018 by increasing the permitted activity area limit to match the operative NRP Rule R104 limit and making consequential amendments to Rule P.R17 to reflect this increase.	Accept in part
S255.010	Woodridge Holdings Ltd			2 Interpretation	Erosion and sediment management plan	Amend		Notes there are definitions for plantation forestry and vegetation clearance on highest erosion risk land, but no definition associated with earthworks generally.	Add a definition for an erosion and sediment control plan for general earthworks.		Reject
S255.010	Woodridge Holdings Ltd	FS45.096	Kāinga Ora – Homes and Communities	2 Interpretation	Erosion and sediment management plan		Support	Kāinga Ora supports this submission as it provides clarity for plan users.	Allow	Notes there are definitions for plantation forestry and vegetation clearance on highest erosion risk land, but no definition associated with earthworks generally. Add a definition for an erosion and sediment control plan for general earthworks.	Reject
S255.013	Woodridge Holdings Ltd			General comments	Mechanical land preparation	Amend		Considers the approach to the definition is inconsistent with that for National Threatened freshwater species as it requires the reader to look up the National Environmental Standards for Plantation Forestry. Either they are referenced which requires people to look them up or they are referenced and the definition included. Suggests including a hyperlink to the definition in the referenced document.	Consistency in the way all definitions are referenced.		Accept in part
S255.016	Woodridge Holdings Ltd			8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Amend		Either they are referenced which requires people to look them up or they are referenced and the definition included.Suggests including a hyperlink to the definition in the referenced document.	Consistency in the way all definitions are referenced.		Accept in part
S255.066	Woodridge Holdings Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.	Amend		Considers P.R16 repeats WH.R17 and should be deleted.	Combine into one rule.		Reject
S255.067	Woodridge Holdings Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Considers P.R17 repeats WH.R18 and as such is unnecessary.	Combine into one rule.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S255.068	Woodridge Holdings Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Amend		Considers P.R17 repeats WH.R18 and as such is unnecessary.	Combine into one rule.		Reject
S255.069	Woodridge Holdings Ltd			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Amend		Considers P.R19 repeats WH.R20 and should be deleted.	Combine into one rule.		Reject
S255.070	Woodridge Holdings Ltd			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Amend		Considers P.R20 repeats WH.R21 and as such is unnecessary.	Combine into one rule.		Reject
S255.071	Woodridge Holdings Ltd			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Amend		Considers P.R21 repeats WH.R22 and as such is unnecessary.	Combine into one rule.		Reject
S255.117	Woodridge Holdings Ltd			13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Amend		Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.		Reject
S255.118	Woodridge Holdings Ltd			13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	Amend		Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.		Reject
S255.118	Woodridge Holdings Ltd	FS50.182	New Zealand Carbon Farming Group ('NZCF')	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.		Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Map 92 is replaced with the erosion susceptibility classification in the NESPF.	Allow	Not stated	Reject
S255.120	Woodridge Holdings Ltd			13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.	Amend		Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.		Reject
S255.121	Woodridge Holdings Ltd			13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Amend		Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.		Reject
S255.121	Woodridge Holdings Ltd	FS50.183	New Zealand Carbon Farming Group ('NZCF')	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Map 95 is replaced with the erosion susceptibility classification in the NESPF.	Allow	Not stated	Reject
S257.034	Kāinga Ora – Homes and Communities			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Generally supports intent of this rule but seeks a clear threshold for vegetation clearance that can occur as a permitted activity.	Introduce a permitted threshold of vegetation clearance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.034	Kāinga Ora – Homes and Communities	FS47.232	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a	Allow	Allow S257.034 by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								larger area for regionally significant infrastructure consistent with the limits in Rule R104;		consistent with operative Rule R104.	
S257.035	Kāinga Ora – Homes and Communities			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Generally supports the intent of this rule but considers the 200m ² threshold too onerous. Considers it unclear how 200m ² for the clearance of woody vegetation has been arrived at, noting the operative NRP provides for such clearance up to 2ha.	Increase the threshold of vegetation clearance before consent is required as a controlled activity. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.035	Kāinga Ora – Homes and Communities	FS20.059	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	The submission is in general alignment with Transpower's submission on rule WH.R17.	Allow	Transpower supports the request to amend rule WH.R18 (and consequently WH.R17) to increase the threshold of vegetation clearance before consent is required as a controlled activity.	Accept in part
S257.035	Kāinga Ora – Homes and Communities	FS47.241	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose in part	Meridian notes that there is no permitted activity rule currently providing for vegetation clearance for purposes other than those listed in Rule WH.R17. This means that vegetation clearance up to 200m ² for other purposes requires consent as a discretionary activity. Meridian agrees the 200m ² limit is unduly onerous and considers it should be increased, particularly for vegetation clearance associated with regionally significant infrastructure, as a permitted activity and that the area should match the area limit of operative NRP Rule R104. Meridian supports the proposed controlled activity provision for vegetation clearance of areas greater than the permitted activity limit (provide the permitted activity limit is increased to match Rule R104).	Disallow in part	Allow S257.035 by increasing the permitted activity Rule WH.R17 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule WH.R18 to reflect this.	Accept in part
S257.062	Kāinga Ora – Homes and Communities			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Generally supports intent of this rule but seeks a clear threshold for vegetation clearance that can occur as a permitted activity.	Introduce a permitted threshold of vegetation clearance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.062	Kāinga Ora – Homes and Communities	FS47.371	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land – permitted activity.		Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow	Allow S257.062 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Accept in part
S257.063	Kāinga Ora – Homes and Communities			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Generally supports the intent of this rule but considers the 200m ² threshold too onerous. Considers it unclear how 200m ² for the clearance of woody vegetation has been arrived at, noting the operative NRP provides for such clearance up to 2ha.	Increase the threshold of vegetation clearance before consent is required as a controlled activity. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.063	Kāinga Ora – Homes and Communities	FS20.067	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support	The submission is in general alignment with Transpower's submission on rule P.R16.	Allow	Transpower supports the request to amend rule P.R17 (and consequently P.R16) to increase the threshold of vegetation clearance before consent is required as a controlled activity.	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S257.063	Kāinga Ora – Homes and Communities	FS47.381	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose in part	Meridian notes that there is no permitted activity rule currently providing for vegetation clearance for purposes other than those listed in Rule P.R16. This means that vegetation clearance up to 200m ² for other purposes requires consent as a discretionary activity. Meridian agrees the 200m ² limit is unduly onerous and considers it should be increased, particularly for vegetation clearance associated with regionally significant infrastructure, as a permitted activity and that the area should match the area limit of operative NRP Rule R104. Meridian supports the proposed controlled activity provision for vegetation clearance of areas greater than the permitted activity limit (provide the permitted activity limit is increased to match Rule R104).	Disallow in part	Allow S257.063 by increasing the permitted activity Rule P.R16 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule P.R17 to reflect this.	Accept in part
S257.073	Kāinga Ora – Homes and Communities			13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Neutral		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. 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.	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.073	Kāinga Ora – Homes and Communities	FS20.075	Transpower New Zealand Limited	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.		Oppose	Transpower considers that a mapped approach (subject to Transpower's submissions on maps 91 and 94) provides more certainty than a definition. Depending on how any definition is framed, it may be subject to a broad range of interpretations, which could reduce certainty of interpretation for plan users and Council officers when identifying areas subject to the relevant vegetation clearance rules.	Disallow	Transpower opposes the request to delete maps 91 and 94 (highest erosion risk land (woody vegetation)) and replacing these with a definition for "high and highest risk erosion land".	Accept in part
S257.073	Kāinga Ora – Homes and Communities	FS28.105	Waka Kotahi NZ Transport Agency	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.		Support	Support subject to definitions being clear.	Allow	Not stated	Accept in part
S257.074	Kāinga Ora – Homes and Communities			13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	Neutral		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. 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.	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.074	Kāinga Ora – Homes and Communities	FS28.106	Waka Kotahi NZ Transport Agency	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.		Support	Support subject to definitions being clear.	Allow	Not stated	Accept in part
S257.074	Kāinga Ora – Homes and Communities	FS50.087	New Zealand Carbon Farming Group ('NZCF')	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.		Support	NZCF supports the submission to the extent that the submission identifies that the Map is not readily understood at a site level	Allow	Not stated	Accept in part
S257.076	Kāinga Ora – Homes and Communities			13 Maps	Map 94: Highest erosion risk land (Woody vegetation) – Te Whanganui-a-Tara.	Neutral		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. Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be necessary to fully		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								those areas of land subject to the corresponding rules rather than high level maps.	achieve the relief sought in this submission.		
S257.076	Kāinga Ora – Homes and Communities	FS20.076	Transpower New Zealand Limited	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Oppose	Transpower considers that a mapped approach (subject to Transpower's submissions on maps 91 and 94) provides more certainty than a definition. Depending on how any definition is framed, it may be subject to a broad range of interpretations, which could reduce certainty of interpretation for plan users and Council officers when identifying areas subject to the relevant vegetation clearance rules.	Disallow	Transpower opposes the request to delete maps 91 and 94 (highest erosion risk land (woody vegetation)) and replacing these with a definition for "high and highest risk erosion land".	Accept in part
S257.076	Kāinga Ora – Homes and Communities	FS28.108	Waka Kotahi NZ Transport Agency	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Support	Support subject to definitions being clear.	Allow	Not stated	Accept in part
S257.076	Kāinga Ora – Homes and Communities	FS47.456	Meridian Energy Limited	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Support in part	Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;	Allow in part	Allow S257.076	Accept in part
S257.077	Kāinga Ora – Homes and Communities			13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Neutral		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. 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.	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.077	Kāinga Ora – Homes and Communities	FS28.109	Waka Kotahi NZ Transport Agency	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Support	Support subject to definitions being clear.	Allow	Not stated	Accept in part
S257.077	Kāinga Ora – Homes and Communities	FS50.088	New Zealand Carbon Farming Group ('NZCF')	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Support	NZCF supports the submission to the extent that the submission identifies that the Map is not readily understood at a site level	Allow	Not stated	Accept in part
S26.017	Christine Stanley			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	Amend		Seeks definition of pest plants	Include definition of pest plants		Accept
S260.013	Cannon Point Development Limited (Ltd.)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Notes the clearance of vegetation on Highest Erosion Risk Land (woody vegetation) that is a total area of 200m2 or less in any consecutive 12-month period, and any associated discharge of sediment to a water where this is not to implement the erosion risk treatment plan or for the control of pest plants is not provided for as a permitted or controlled activity. Therefore, it is a discretionary activity under Rule WH.R19. Considers it is unclear whether it is council's intention for vegetation clearance of 200m2 or less, in this erosion risk overlay, to be a discretionary activity. Assumes this to be a drafting error, . Considers the discretionary activity as it stands is onerous and unnecessary. Considers where there are large properties and track maintenance is required to clear woody vegetation, a permitted activity standard of 200m2 per property is too small. Considers clearance of 2000m2 per property as a minimum or provision for	Amend Rule as follows: Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is a total of 200m2 or less per property in any consecutive 12-month period, or (a)(b) the vegetation clearance is:(i) to undertake track maintenance, or (i) (ii) to implement an action in the		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								clearing of vegetation for track maintenance should be considered.	erosion risk treatment plan for the farm, or(ii) (iii) for the control of pest plants, and (b) (c) debris from the vegetation clearance is not placed where it can enter a surface water body. 		
S260.013	Cannon Point Development Limited (Ltd.)	FS23.016	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S260.013	Cannon Point Development Limited (Ltd.)	FS47.233	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow in part	Allow S260.013 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Accept in part
S260.014	Cannon Point Development Limited (Ltd.)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Considers where there are large properties and track maintenance is required to clear woody vegetation, a permitted activity standard of 200m2 per property is too small. Considers clearance of 2000m2 per property as a minimum or provision for clearing of vegetation for track maintenance should be considered. Considers consequential amendments to this controlled activity rule are sought.	Amend as follows: Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200m2 per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body, that is not a permitted activity under Rule WH.R17, is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this Rule.		Accept in part
S260.014	Cannon Point Development Limited (Ltd.)	FS23.017	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S260.015	Cannon Point Development Limited (Ltd.)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Support		Supported if Rules WH.R17 and WH.R18 are amended as sought.	AmendRule WH.R17 and WH.R18 as sought.		Accept in part
S260.015	Cannon Point Development Limited (Ltd.)	FS23.018	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										submission points and specific relief.	
S260.019	Cannon Point Development Limited (Ltd.)			13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.	Amend		Concerned about the pixelated display of the highest erosion risk areas and the associated physical boundaries identified in Map 94. 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.	Amend the display of 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.		Accept in part
S260.019	Cannon Point Development Limited (Ltd.)	FS23.022	Forest & Bird	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S261.012	Forest & Bird			2 Interpretation	Afforestation	Oppose		Seeks full text is referenced to assist plan users.	Include full text of definition. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.012	Forest & Bird	FS9.339	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	Afforestation		Oppose	Not stated	Disallow	Not stated	Accept
S261.012	Forest & Bird	FS27.631	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	Afforestation		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S261.016	Forest & Bird			General comments	Harvesting	Amend		Seeks full text is referenced to assist plan users.	Include full text of definition. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.016	Forest & Bird	FS9.343	New Zealand Farm Forestry Association (NZFFA)	General comments	Harvesting		Oppose	Not stated	Disallow	Not stated	Accept
S261.016	Forest & Bird	FS27.635	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	General comments	Harvesting		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S261.021	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Replanting	Not Stated		Seeks full text is referenced to assist plan users.	Include full text of definition. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.021	Forest & Bird	FS9.348	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Replanting		Oppose	Not stated	Disallow	Not stated	Accept
S261.021	Forest & Bird	FS27.640	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Replanting		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.025	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Amend		Seeks full text is referenced to assist plan users.	Set text of definition for "vegetation clearance" in full. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.025	Forest & Bird	FS9.352	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Oppose	Not stated	Disallow	Not stated	Accept
S261.025	Forest & Bird	FS27.644	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.089	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Amend		Considers retirement of high risk land is required to achieve water quality outcomes. Considers larger setbacks are required and limits on the area of exposed soil are also required.	Include direction that large setbacks are required in areas of plantation forestry and include a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out). Retain (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.089	Forest & Bird	FS25.036	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	The need to add direction regarding large setbacks and a cap on the area logged in one harvest is not necessary in the NRP as the requirements of the NES-CF should take precedence; retaining of clause (c) is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA	Disallow	Retain the wording of Policy WH.P28 as notified, subject to the amendment sought by GTC in their original submission	Accept
S261.089	Forest & Bird	FS9.416	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Not stated	Disallow	Not stated	Accept
S261.089	Forest & Bird	FS27.708	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.089	Forest & Bird	FS50.052	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	NZCF opposes the submission on the basis that the submission does not include evidence or justification for the relief sought.	Disallow	Not stated	Accept
S261.110	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Oppose		Considers the removal of pest plants may still cause sediments to be released and certain pest plants may still be habitat for indigenous species. Considers additional standards are required. Considers mitigation plans are insufficient on their own; therefore seeks a minimum setback from water bodies, coastal marine area, and ephemeral watercourses, as well as a size threshold for vegetation clearance.	Amend as follows: Include additional standards: (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 (x) vegetation clearance does not exceed 200m2 per property in any consecutive 12-month period Delete clause (a)(ii). In the alternative, should pest plants be referred to, 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. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Accept in part
S261.110	Forest & Bird	FS1.049	Horticulture New Zealand	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Setbacks are managed through district plans. Pest plants may need to be removed for biosecurity purposes.	Disallow	Do not introduce additional standards. Amend Rule WH.R17 (a) as follows: (a) (ii) for the control of pest plants, and or (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	Accept in part
S261.110	Forest & Bird	FS8.023	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Winstone oppose setting a setback for vegetation clearance. The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback. Winstone oppose including reference to 'ephemeral watercourses'. The definition of 'ephemeral watercourse' in the NRP is very broad and would include gullies and indents in	Disallow	Winstone seek that relief sought is not allowed.	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								landscapes, all of which are not mapped or easily defined. This would result in significant constraints for undertaking earthworks on any sloping land.			
S261.110	Forest & Bird	FS25.040	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	The additional standards sought by the submitter include matters already addressed in the NES-FM and are not required in the NRP and are not necessary to implement the NPS-FM or to achieve the purpose of the RMA; including reference to ephemeral watercourses is unnecessary and inappropriate	Disallow	Retain the wording of Rule WH.R17 as notified	Accept in part
S261.110	Forest & Bird	FS9.437	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept in part
S261.110	Forest & Bird	FS20.030	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose in part	Transpower opposes including a setback standard for vegetation clearance on the basis that the need for such as standard, is not clearly justified. With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.	Disallow in part	Transpower opposes the request to amend vegetation clearance rule WH.R17 to include the following standard: “(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”.	Accept in part
S261.110	Forest & Bird	FS27.729	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.110	Forest & Bird	FS47.234	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose in part	For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;	Disallow in part	Disallow S261.110.	Accept in part
S261.111	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required.	Reclassify Rule WH.R18 as a discretionary activity; or Reclassify as a restricted discretionary activity and include "adverse effects on the environment" as a matter of discretion. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Accept in part
S261.111	Forest & Bird	FS25.041	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	The need to reclassify the activity status to discretionary is not necessary as the matters of control are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved	Disallow	Retain controlled activity status of Rule WH.R18 as notified	Accept in part
S261.111	Forest & Bird	FS9.438	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Not stated	Disallow	Not stated	Accept in part
S261.111	Forest & Bird	FS20.031	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Subject to the decision requested by Transpower in its submission on rule WH.R18 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with vegetation clearance. On this basis, Transpower considers that discretionary activity status is unjustified. Transpower opposes the alternative request to include "adverse effects on the environment" as a matter of discretion, as this is an overly broad matter of discretion that effectively makes the activity a discretionary activity.	Disallow	Transpower opposes the request to reclassify vegetation clearance rule WH.R18 as a discretionary activity. Transpower opposes the alternative request to include "adverse effects on the environment" as a matter of discretion.	Accept in part
S261.111	Forest & Bird	FS27.730	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								urban area”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.111	Forest & Bird	FS28.079	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Effects can be appropriately managed via permitted activity status (per Waka Kotahi primary submission relief).	Disallow	Not stated	Accept in part
S261.111	Forest & Bird	FS47.242	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	For the reasons explained above, Meridian considers the permitted activity area limit is too small and should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. Meridian opposes a discretionary activity default approach where the threshold area is currently so small.	Disallow	Disallow S261.111.	Accept in part
S261.112	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Support		Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified		Reject
S261.112	Forest & Bird	FS9.439	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
S261.112	Forest & Bird	FS27.731	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.112	Forest & Bird	FS47.248	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Disallow	Disallow S261.112 and reinstate operative NRP Rule R106.	Accept
S261.113	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Amend		Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required.	Reclassify as a discretionary activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.113	Forest & Bird	FS25.042	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	If the rule remains, the need to reclassify the activity status to discretionary is not necessary to implement the NPS-FM or to achieve the purpose of the RMA	Disallow	Retain controlled activity status of Rule WH.R20 as notified, subject to amendment sought by GTC in their original submission	Accept
S261.113	Forest & Bird	FS9.440	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Not stated	Disallow	Not stated	Accept
S261.113	Forest & Bird	FS27.732	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.113	Forest & Bird	FS50.053	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	NZCF opposes the submission on the basis that the submission does not provide clear rationale that discretionary activity status is necessary, efficient or effective to implement the policies in the Proposed Plan Change or higher order planning instruments.	Disallow	Not stated	Accept
S261.114	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Support		Supports management of sediment from activity	Retain as notified		Reject
S261.114	Forest & Bird	FS9.441	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
S261.114	Forest & Bird	FS27.733	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S261.115	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Support		Supports consistency with the purpose of the RMA.	Retain as notified		Reject
S261.115	Forest & Bird	FS9.442	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	Not stated	Disallow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S261.115	Forest & Bird	FS27.734	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S261.115	Forest & Bird	FS50.054	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	NZCF opposes the submission on the basis that the submission does not explain why the Rule is consistent with the purpose of the RMA.	Disallow	Not stated	Accept
S261.168	Forest & Bird			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend		Considers further direction is required to ensure effects are minimised.	Include direction that large setbacks are required in areas of plantation forestry and include a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out). Retain (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.168	Forest & Bird	FS9.495	New Zealand Farm Forestry Association (NZFFA)	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Not stated	Disallow	Not stated	Accept
S261.168	Forest & Bird	FS27.787	Manor Park and Haywards Residents Community	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Incorporate ("MPHRCI")					retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.168	Forest & Bird	FS50.055	New Zealand Carbon Farming Group ('NZCF')	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	NZCF opposes the submission on the basis that the submission does not include evidence or justification for the relief sought.	Disallow	Not stated	Accept
S261.187	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.	Oppose		Considers the removal of pest plants may still cause sediments to be released and certain pest plants may still be habitat for indigenous species. Considers additional standards are required. Considers mitigation plans are insufficient on their own; therefore seeks a minimum setback from water bodies, coastal marine area, and ephemeral watercourses, as well as a size threshold for vegetation clearance.	Include additional standards: (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 (x) vegetation clearance does not exceed 200m2 per property in any consecutive 12-month period Delete clause (a)(ii). In the alternative, should pest plants be referred to, 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 P.R17. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Accept in part
S261.187	Forest & Bird	FS1.072	Horticulture New Zealand	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest		Oppose	Setbacks are managed through district plans. Pest plants may need to be removed for biosecurity purposes.	Disallow	Do not introduce additional standards. Amend Rule WH.R17 (a) as follows:	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					erosion risk land–permitted activity.					(a) (ii) for the control of pest plants, and or (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	
S261.187	Forest & Bird	FS9.514	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept in part
S261.187	Forest & Bird	FS20.047	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.		Oppose in part	Transpower opposes including a setback standard for vegetation clearance on the basis that the need for such as standard, is not clearly justified. With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.	Disallow in part	Transpower opposes the request to amend vegetation clearance rule P.R16 to include the following standard: “(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”.	Accept in part
S261.187	Forest & Bird	FS27.806	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.187	Forest & Bird	FS47.372	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose in part	For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;	Disallow in part	Disallow S261.187.	Accept in part
S261.188	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required.	Reclassify Rule P.R17 as a discretionary activity; or Reclassify as a restricted discretionary activity and include "adverse effects on the environment" as a matter of discretion. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.188	Forest & Bird	FS9.515	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Not stated	Disallow	Not stated	Accept
S261.188	Forest & Bird	FS20.048	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Subject to the decision requested by Transpower in its submission on rule P.R17 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with vegetation clearance. On this basis, Transpower considers that discretionary activity status is unjustified. Transpower opposes the alternative request to include "adverse effects on the environment" as a matter of discretion, as this is an overly broad matter of discretion that effectively makes the activity a discretionary activity.	Disallow	Transpower opposes the request to reclassify vegetation clearance rule P.R17 as a discretionary activity. Transpower opposes the alternative request to include "adverse effects on the environment" as a matter of discretion.	Accept
S261.188	Forest & Bird	FS27.807	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.188	Forest & Bird	FS28.080	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Effects can be appropriate managed via permitted activity status (per Waka Kotahi primary submission relief).	Disallow	Not stated	Accept
S261.188	Forest & Bird	FS47.382	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	For the reasons explained above, Meridian considers the permitted activity area limit is too small and should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. Meridian opposes a discretionary activity default approach where the threshold area is currently so small.	Disallow	Disallow S261.188.	Accept
S261.189	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Support		Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified		Reject
S261.189	Forest & Bird	FS9.516	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
S261.189	Forest & Bird	FS27.808	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								discharges to water from activities on this site, is appropriate.			
S261.189	Forest & Bird	FS47.387	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Disallow	Disallow S261.189 and reinstate operative NRP Rule R106.	Accept
S261.190	Forest & Bird			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Amend		Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required.	Reclassify as a discretionary activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
S261.190	Forest & Bird	FS9.517	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Not stated	Disallow	Not stated	Accept
S261.190	Forest & Bird	FS27.809	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S261.190	Forest & Bird	FS50.056	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	NZCF opposes the submission on the basis that the submission does not provide clear rationale that discretionary activity status is necessary, efficient or effective to implement the policies in the Proposed Plan Change or higher order planning instruments.	Disallow	Not stated	Accept
S261.191	Forest & Bird			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Support		Supports management of sediment issues.	Retain as notified		Reject
S261.191	Forest & Bird	FS9.518	New Zealand Farm Forestry	9 Te Awarua-o-	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept

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S261.191	Forest & Bird	FS27.810	Association (NZFFA) Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	Porirua Whaitua 9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S261.192	Forest & Bird			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Support		Supports avoidance of sediment issues.	Retain as notified		Reject
S261.192	Forest & Bird	FS9.519	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	Not stated	Disallow	Not stated	Accept
S261.192	Forest & Bird	FS27.811	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.233	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Support		Supports giving effect to the NPSFM and management of sediment.	Not stated		No recommendation
S261.233	Forest & Bird	FS9.560	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.233	Forest & Bird	FS27.852	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly,	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.234	Forest & Bird			##	A Purposes of the Erosion and Sediment Management Plan	Support		Supports giving effect to the NPSFM and management of sediment.	Not stated		No recommendation
S261.234	Forest & Bird	FS9.561	New Zealand Farm Forestry Association (NZFFA)	##	A Purposes of the Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.234	Forest & Bird	FS27.853	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	##	A Purposes of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S261.235	Forest & Bird			2 Interpretation	B Management objectives	Support		Supports giving effect to the NPSFM and management of sediment.	Not stated		No recommendation
S261.235	Forest & Bird	FS9.562	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	B Management objectives		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.235	Forest & Bird	FS27.854	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	B Management objectives		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.236	Forest & Bird			2 Interpretation	C Requirements of the Erosion and Sediment Management Plan	Support		Supports giving effect to the NPSFM and management of sediment.	Not stated		No recommendation
S261.236	Forest & Bird	FS9.563	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.236	Forest & Bird	FS27.855	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	2 Interpretation	C Requirements of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.237	Forest & Bird			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Support		Supports giving effect to the NPSFM and management of sediment.	Not stated		No recommendation
S261.237	Forest & Bird	FS9.564	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.237	Forest & Bird	FS27.856	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S261.238	Forest & Bird			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Oppose		Considers GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk	Not stated		No recommendation

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S261.238	Forest & Bird	FS9.565	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.238	Forest & Bird	FS27.857	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S261.239	Forest & Bird			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Support		Supports giving effect to the NPSFM and management of sediment.	Not stated		No recommendation
S261.239	Forest & Bird	FS9.566	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.239	Forest & Bird	FS27.858	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.240	Forest & Bird			2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan	Not Stated		Not stated	Not stated		No recommendation
S261.240	Forest & Bird	FS9.567	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.240	Forest & Bird	FS27.859	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	2 Interpretation	C2 Certification of the Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly,	Allow	Not stated	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.241	Forest & Bird			2 Interpretation	D Amendment of Erosion and Sediment Management Plan	Oppose		Considers GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk	Not stated		No recommendation
S261.241	Forest & Bird	FS9.568	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Oppose	Not stated	Disallow	Not stated	No recommendation
S261.241	Forest & Bird	FS27.860	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	D Amendment of Erosion and Sediment Management Plan		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	No recommendation
S261.268	Forest & Bird			13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Support		Considers maps assist with plan interpretation.	Retain as notified.		Accept in part
S261.268	Forest & Bird	FS9.595	New Zealand Farm Forestry Association (NZFFA)	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.		Oppose	Not stated	Disallow	Not stated	Accept in part
S261.268	Forest & Bird	FS27.887	Manor Park and Haywards	13 Maps	Map 91: Highest erosion risk land		Support	Our natural environment should be protected or improved where it is degraded or risks being	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Residents Community Incorporate ("MPHRCI")		(Woody vegetation) – Te Awarua-o-Porirua.			degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.269	Forest & Bird			13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	Support		Considers maps assist with plan interpretation.	Retain as notified.		Accept in part
S261.269	Forest & Bird	FS9.596	New Zealand Farm Forestry Association (NZFFA)	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.		Oppose	Not stated	Disallow	Not stated	Accept in part
S261.269	Forest & Bird	FS27.888	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.271	Forest & Bird			13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.	Support		Considers maps assist with plan interpretation.	Retain as notified.		Accept in part
S261.271	Forest & Bird	FS9.598	New Zealand Farm Forestry Association (NZFFA)	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Oppose	Not stated	Disallow	Not stated	Accept in part
S261.271	Forest & Bird	FS27.890	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.271	Forest & Bird	FS47.457	Meridian Energy Limited	13 Maps	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.		Oppose	Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;	Disallow	Disallow S261.271 and delete the map.	Accept in part
S261.272	Forest & Bird			13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Support		Considers maps assist with plan interpretation.	Retain as notified.		Accept in part
S261.272	Forest & Bird	FS9.599	New Zealand Farm Forestry Association (NZFFA)	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Oppose	Not stated	Disallow	Not stated	Reject
S261.272	Forest & Bird	FS27.891	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S262.001	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		Supports the inclusion of Te Mana o te Wai in the NPS-FM. However, considers the rules need to be supported by appropriate evidence, implemented in accordance with relevant statutory provisions and consistent with the NES-CF Framework.	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S262.003	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		Considers there has been no consideration for ETS implication with the removal of land from production.	Not stated		No recommendation
S262.003	Southern North Island Wood Council	FS50.136	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	Consistent with NZCF's primary submission, NZCF supports the submission and considers that no consideration has been given to the ETS in Proposed Plan Change 1 and the accompanying section 32 evaluation.	Allow	Not stated	No recommendation
S262.004	Southern North Island Wood Council (S262)			General comments	General comments - maps	Not Stated		Considers there are impracticalities of the current erosion mapping class system. Considers the resolution too low and does not reflect forest scale erosion risk.	Not stated		No recommendation
S262.004	Southern North Island Wood Council	FS50.137	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - maps		Support	NZCF supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic, geological and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.	Allow	Not stated	No recommendation
S262.005	Southern North Island Wood Council			General comments	General comments - maps	Not Stated		Considers PC1 poses a significant risk to forest investment in the region. Considers the loss of productive area, often for no major environmental gains, lowers land values, wards off investment and has a direct economic impact on people of the region.	Not stated		No recommendation
S262.006	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		Notes commercial forestry is a major export earner and employer of local people and service providers during establishment, management and harvesting; and at the port and local sawmills. Notes in the two Whaituas the total area in plantation forest is almost 12,000 ha. Notes that as well as income and employment, plantation forests provide major environmental benefits relating to climate regulation, reducing erosion, and preventing sediment getting into waterways. Notes forests also act as a carbon sink and help mitigate climate change, and that the Climate Change Commission has recommended a national increase in the plantation forest estate by 500,000 ha between 2021 and 2030.	Not stated		No recommendation
S262.007	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		States that plantation forests discharge less sediment than other commercial land uses, citing the Pakuratahi Land Use Study by Garth Eyles and Barry Fahey. States that monitoring shows water quality is higher in catchments with significant forest cover, compared to other land uses. Concerned that PC1 will result in a decline in commercial forestry, resulting in adverse economic and environmental effects.	Not stated		No recommendation
S262.008	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		Considers that PC1 deters investment in commercial forestry, primarily due to the proposed rules and associated costs, which may hinder harvesting of certain lands. Concerned that the "highest risk" classification of land will diminish land value for forest owners. Considers that PC1 is inconsistent with local and national climate objectives.	Not stated		No recommendation
S262.009	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		States the s32 report attributes current water quality issues to forestry without sufficient supporting evidence. Considers that recent NES-CF changes are sufficient to protect freshwater.	Not stated		No recommendation
S262.010	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		Notes the NES-CF was altered to include permanent carbon forestry to fix a loop hole related to resource consents and notifications. Considers PC1 will severely impact forest owners in the region with ETS registered forests. Notes one member of the submitter's organisation will lose between 4% and 18% of productive area by forest, which equates to 330ha. The ETS Liability on this area at current prices is approximately \$18 million NZD.	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S262.010	Southern North Island Wood Council	FS50.138	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	Consistent with NZCF's primary submission, NZCF supports the submission and considers that no consideration has been given to the ETS in Proposed Plan Change 1 and the accompanying section 32 evaluation.	Allow	Not stated	No recommendation
S262.011	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		Considers 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; - 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. Considers that the NES-CF is sufficient to manage sediment from forestry activities.	Not stated		No recommendation
S262.011	Southern North Island Wood Council	FS50.139	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S262.012	Southern North Island Wood Council			General comments	General comments - plantation forestry	Not Stated		Considers 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 s32 should explicitly acknowledge high and medium economic costs for Option 1 and Option 3, respectively. Notes further economic considerations, being devaluation of forest land; decline in economic activity; and loss 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".	Not stated		No recommendation
S262.012	Southern North Island Wood Council	FS50.140	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and considers that the section 32 evaluation has failed to appropriately consider the economic costs of the Proposed Plan Change 1 provisions that relate to forestry.	Allow	Not stated	No recommendation
S262.014	Southern North Island Wood Council			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.		Reject
S262.015	Southern North Island Wood Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2,	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.		
S262.015	Southern North Island Wood Council	FS50.141	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S262.016	Southern North Island Wood Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Oppose		Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.		Accept in part
S262.016	Southern North Island Wood Council	FS50.142	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S262.017	Southern North Island Wood Council			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Oppose		Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.		Accept in part
S262.017	Southern North Island Wood Council	FS50.143	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S262.019	Southern North Island Wood Council			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	<p>rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan.</p>		
S262.020	Southern North Island Wood Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	<p>Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan.</p>		Accept in part
S262.020	Southern North Island Wood Council	FS50.144	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S262.021	Southern North Island Wood Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Not Stated		Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	<p>Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan.</p>		Accept in part
S262.021	Southern North Island Wood Council	FS50.145	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S262.022	Southern North Island Wood Council			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Not Stated		Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	<p>Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p>		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.		
S262.022	Southern North Island Wood Council	FS50.146	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S263.001	New Zealand Carbon Farming Group ('NZCF')			2 Interpretation	General comments - overall	Oppose		Notes that the purpose of PC1 is to give effect to NPSFM in two of the five whaitua of the Wellington region and implement regulatory and some of the non-regulatory recommendations from Whaitua Te Whanganui-a-Tara Implementation Programme ("TWT WIP") and Te Awarua-o-Porirua Implementation Programme ("Top WIP"), including by implementing the National Objectives Framework ("NOF") within Te Awarua-o-Porirua and Te Whanganui-a-Tara whaitua. Notes the Section 32 Report concludes the outcome sought by PC1 is the reduction of sediment in the rivers in Te Awarua-o-Porirua and Te Whanganui-a-Tara. The Section 32 Report concludes that:• plantation forestry has associated land disturbance and discharges of sediment;• forestry is a major land use in the Te Awarua-o-Porirua and Te Whanganui-a-Tara whaitua (13.5% and 8% respectively);• much of this forestry is located on steep land in the higher elevation areas;• harvesting of the forests occurs and will continue to occur;• therefore, to control sediment and meet outcomes, a combination of regulation of land uses and discharges will be required (including the avoidance of soil disturbance associated with plantation forestry on land with high risk of erosion, incentives and rules to permanently revegetate high risk erosion land).Submitter 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.	1. 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: - 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 accurately and appropriately reflected in Proposed Plan Change 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. 2. 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 Table at Appendix A. 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.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									3. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission. 4. Consistent with the Implementation Plans' recommendations, 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.		
S263.001	New Zealand Carbon Farming Group ('NZCF')	FS23.372	Forest & Bird	2 Interpretation	General comments - overall		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.002	New Zealand Carbon Farming Group ('NZCF')			2 Interpretation	General comments - fresh water	Oppose		Notes majority of PC1 provisions subject to this submission form part of a freshwater planning instrument. Notes the Section 32 Report provides the following justification in 'Table A1: Analysis of PC1 provisions, including definitions, schedules, and maps, to identify the freshwater planning instrument' in respect of the forestry related provisions: "These policies, rules, method and supporting definitions, schedules and maps focus on the management of rural land use activities, forestry, and vegetation clearance. These provisions seek to manage the use of land to achieve freshwater outcomes. They relate to objectives that give effect to the NPS-FM. "Given the stated primary intent of the provisions is to manage a land use activity, considers PC1 draws a longbow in determining scope of the freshwater planning instrument. Concerned using a freshwater planning instrument to address land use activities inappropriately affects (inferred) the procedural rights of the submitter. Notes PC1 including the Section 32 Report, does not explicitly identify the Objective that gives rise to the provisions being a freshwater planning instrument.	1. 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: - 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 accurately and appropriately reflected in Proposed Plan Change 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. 2. Should the relevant provisions of the Proposed Plan Change not be withdrawn (or the Proposed Plan		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									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 Table at Appendix A. 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. 3. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission. 4. Consistent with the Implementation Plans' recommendations, 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.		
S263.002	New Zealand Carbon Farming Group ('NZCF')	FS23.373	Forest & Bird	2 Interpretation	General comments - fresh water		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.003	New Zealand Carbon Farming Group ('NZCF')			2 Interpretation	General comments - definitions	Oppose		Notes 'Production forestry' is defined in 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. Notes Section 32 Report includes the following statement suggesting the scope of PC1 expands as the NES-CF is addressed through submissions and decision-making: "In these FMUs, plantation forest management is currently only subject to the regulations of the NES-PF, that came into force on 1 May 2018. From 03 November 2023, the NES-PF will be replaced by the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2023 (NES-CF). The NES-CF extends the NES-PF to cover carbon forests as well as plantation forests, so the Plan Change 1 provisions applying to forestry are expected to remain appropriate with respect to the NES-CF, with some amendments to terminology. As the NES-CF will not be in effect at the date of notification of Plan Change 1, any amendments will be managed through the submissions and decision-making process." 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'. Considers management of discharges from 'carbon forests', or 'carbon forests' more generally, is outside the scope of PC1.	1. 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: - 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 accurately and appropriately reflected in Proposed Plan Change 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		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>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.</p> <p>2. 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 Table at Appendix A. 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.</p> <p>3. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission.</p> <p>4. Consistent with the Implementation Plans' recommendations, 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>		
S263.003	New Zealand Carbon Farming Group ('NZCF')	FS23.374	Forest & Bird	2 Interpretation	General comments - definitions		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.004	New Zealand Carbon Farming Group ('NZCF')			General comments	General comments - plantation forestry	Oppose		Notes that PC1 acknowledges the NESCF came into force on 3 November 2023, but does not give explicit consideration to whether 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 Whāita's (inferred)Notes the NESCF is a national direction planning instrument and secondary legislation made under sections 43, 43A and 44 of the RMA. Noting the purpose and role in the hierarchy of RMA planning instruments, submitter considers it is important for Council to allow the NESCF to be appropriately implemented (including required monitoring). Considers it is premature for Council to promulgate a plan change to regulate production forest activities when new regulations have been	Seeks PC1 be 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		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								made. 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.			
S263.004	New Zealand Carbon Farming Group ('NZCF')	FS23.375	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.005	New Zealand Carbon Farming Group ('NZCF')			General comments	General comments - plantation forestry	Oppose		Submitter understands PC1 prevails over those regulations in NESPF listed in the 'Note' that accompanies the new Rules in Chapters 8 and 9. In terms of NESCF, the Section 32 Report states: "The National Environmental Standards for Commercial Forestry (NES-CF) will, from 03 November 2023, supersede the NES-PF. The NES-CF will regulate commercial forestry activities for both carbon and timber production (plantation) forests. Plan Change 1 will introduce new provisions for forestry for the management of best practice to reduce sediment from sites. It is not expected that the NES-CF will impact on the approach being taken to manage forestry in Plan Change 1, and the new provisions will prevail over NES-CF rules." Submitter considers this gives rise to an issue in respect of whether the PC1 provisions prevail over NESCF. Considers provisions of PC1 cannot prevail over NESCF because this was not included in PC1 as notified. Does not consider this confusion can be remedied by simply replacing the acronym 'NESPF' with 'NESCF' without scope of PC1 being called into question.	Seeks that PC1 is withdrawn (or the Proposed Plan Change is not included in the NRP).		Accept in part
S263.005	New Zealand Carbon Farming Group ('NZCF')	FS23.376	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.007	New Zealand Carbon Farming Group ('NZCF')			General comments	General comments - plantation forestry	Oppose		Acknowledges Te Whaitua te Whanganui-a-Tara Implementation Programme addresses plantation forestry as follows: "Plantation forestry can have benefits for water quality, but it also brings a high risk of sediment loss in the years after harvesting, particularly in the headwaters of Te Awa Kairangi/Hutt River. Unfortunately, the evidence we have heard suggests that good-practice sediment management in line with national rules is not yet being consistently used. This suggests a need to ramp up investigations of, and prosecutions for, poor management with greater accountability to communities affected by the consequences of poor practice."In response, the Implementation Programme includes the following recommendation: "SUPPORTING BEST PRACTICE AND COMPLIANCE OF FORESTRY OPERATIONS Greater Wellington provides enough staff and resources to: - Work with forestry groups (New Zealand Farm Forestry Association, New Zealand Forest Owners Association) and contractors to provide proactive advisory support that includes	Seeks PC1 be withdrawn (or the Proposed Plan Change is not included in the NRP) and redrafted to reflect recommendations in the Implementation Plan.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								ensuring all forestry operators are aware (by 2023) of relevant regulatory requirements and good practice- Ensure all forestry operators in the whaitua are monitored for compliance with NES-PF and other relevant requirements from 2023 onwards, and share this monitoring information with the community- Take enforcement action on non-compliance. Submitter considers that while purported to implement the recommendations in the Implementation Plan, PC1 does not resemble the recommendations. In this regard, the Implementation Plan relies on NESPF, whereas PC1 seeks to override it. Also notes, PC1 fails to acknowledge benefits for water quality from plantation forestry that have been identified in the Implementation Plan.			
S263.007	New Zealand Carbon Farming Group ('NZCF')	FS23.378	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.008	New Zealand Carbon Farming Group ('NZCF')			General comments	General comments - plantation forestry	Oppose		Acknowledges the Te Awarua-o-Porirua Whaitua Implementation Programme 2019 concludes as follows:“ Earthworks and forestry operations, if undertaken correctly and on suitable land, should result in minimal (if any) discharges of sediment to the streams and harbour. The challenge is to ensure all earthworks and forestry operations are undertaken on suitable land and using good practice and the risks of sediment-laden water running off-site is minimised. ”Notes the Implementation Programme includes a specific section that addresses forestry - refer to Section 10.3 Forestry and recommendations 54-57. Notes that while purported to implement the recommendations in the Implementation Plan, the PC1 does not resemble the recommendations. Considers Implementation Plan also relies on NESPF and explicitly acknowledges time should be allowed for NESPF to be implemented. Notes as per the Te Whaitua te Whanganui-a-Tara Implementation Programme, PC1 fails to respond to recommendations that emphasise engagement and monitoring. Submitter agrees the NESPF, and now the NESCF, should be given time to 'bed-in' before more stringent provisions are included in the NRP.	Seeks PC1 be withdrawn (or the Proposed Plan Change is not included in the NRP) and redrafted to reflect recommendations in the Implementation Plan.		Accept in part
S263.008	New Zealand Carbon Farming Group ('NZCF')	FS23.379	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.009	New Zealand Carbon Farming Group ('NZCF')			General comments	General comments - plantation forestry	Oppose		Notes despite direction given in section 66 of RMA, PC1, including accompanying supporting documentation is silent on implications in respect of New Zealand's climate change response, and the contribution forestry makes to this response. That is:- 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	Seeks PC1 be withdrawn (or not included in the NRP)		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								liabilities therein. For instance, the liability and costs for deforestation.- PC1 is directly contrary to New Zealand's Emissions Reduction Plan (made in accordance with section 5Z1 of the Climate Change Response Act 2002). The Emissions Reduction Plan includes an entire chapter (Chapter 14) that addresses forestry. Notes chapter identifies the following 'key actions' to support the role of forestry in meeting New Zealand's 2050 targets: "Support afforestation by:- considering amendments to the New Zealand Emissions Trading Scheme (NZ ETS) and resource management settings to achieve the right type and scale of forests, in the right place- supporting landowners and others to undertake afforestation, particularly for erodible land- providing advisory services to land users, councils, Māori and other stakeholders to support choices for sustainable afforestation. Encourage native forests as long-term carbon sinks through reducing costs and improving incentives. Maintain existing forests by exploring options to reduce deforestation and encourage forest management practices that increase carbon stocks in pre-1990 forests. Grow the forestry and wood processing industry to deliver more value from low-carbon products, while delivering jobs for communities."- PC1 is not consistent with New Zealand's National Adaptation Plan (made in accordance with section 5Z1 of the Climate Change Response Act 2002) and does not consider implications of Actions 3.13 and 6.12.			
S263.009	New Zealand Carbon Farming Group ('NZCF')	FS23.380	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.010	New Zealand Carbon Farming Group ('NZCF')			General comments	General comments - plantation forestry	Oppose		Submitter considers that the Section 32 Report:- fails to clearly identify Objective, or Objectives, the provisions of PC1 are to achieve and therefore does not support a conclusion that provisions are most appropriate; - does not include any evidence to support conclusions in respect of extent to which sediment in streams is reduced by various options that are evaluated;- 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;- does not address New Zealand's Emissions Reduction Plan (made in accordance with section 5Z1 of the Climate Change Response Act 2002) as required by section 66 of the RMA and particularly does not consider contribution forestry makes to achieving New Zealand's emissions reduction target;- does not address New Zealand's National Adaptation Plan (made in accordance with section 5Z1 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;- 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	Seeks PC1 be withdrawn (or not included in the NRP)		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								of the maps causing the ability to use neighbouring land for forest to be prevented or constraint through ownership, scale, access and economic constraints;- fails to describe or set out the social costs of the various options that have been evaluated;- does not quantify the costs of the various options, including in respect of employment and the New Zealand Emissions Trading Scheme; and- 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. Considers PC1 is flawed because the evaluation required under section 32(4) has not been completed or documented in the Section 32 Report. Considers the Section 32 Report is inadequate and fails to confirm the provisions are the most appropriate, efficient of effective means to achieve Objectives or give effect to higher order planning instruments.			
S263.010	New Zealand Carbon Farming Group ('NZCF')	FS23.381	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.011	New Zealand Carbon Farming Group ('NZCF')			2 Interpretation	Afforestation	Support		Does not oppose inclusion of a definition of 'Afforestation' in the NRP as the term should be consistently understood where it is used in the provisions of the NRP. Notes proposed definition refers to the NESPF 2017 and does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain 'Afforestation' definition as notified.		Accept in part
S263.011	New Zealand Carbon Farming Group ('NZCF')	FS23.382	Forest & Bird	2 Interpretation	Afforestation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S263.013	New Zealand Carbon Farming Group ('NZCF')			2 Interpretation	Erosion and sediment management plan	Amend		Subject to relief sought in this submission, submitter is unsure whether a definition of 'Erosion and sediment management plan' is necessary for implementation of NRP. Submitter does not oppose definition.	Retain definition of 'Erosion and sediment management plan' as notified where the definition is necessary to assist the implementation of NRP.		Accept in part
S263.013	New Zealand Carbon Farming Group ('NZCF')	FS23.384	Forest & Bird	2 Interpretation	Erosion and sediment management plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.014	New Zealand Carbon Farming Group ('NZCF')			General comments	Harvesting	Support		Does not oppose inclusion of a definition for 'Harvesting' in NRP as the term should be consistently understood where it is used in provisions of NRP. Notes the proposed definition refers to NESPF 2017 and as such does not address the	Retain definition of 'Harvesting' as notified.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								establishment of permanent forests, including commercial forests for carbon sequestration purposes.			
S263.014	New Zealand Carbon Farming Group ('NZCF')	FS23.385	Forest & Bird	General comments	Harvesting		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.015	New Zealand Carbon Farming Group ('NZCF')			General comments	Highest erosion risk land (plantation forestry)	Oppose		Submitter opposes proposed Maps 92 and 95 in their entirety. Does not consider the definition of 'Highest erosion risk land (plantation forestry)' is necessary or appropriate.	Delete definition of 'Highest erosion risk land (plantation forestry)' in its entirety.		Accept
S263.015	New Zealand Carbon Farming Group ('NZCF')	FS23.386	Forest & Bird	General comments	Highest erosion risk land (plantation forestry)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.016	New Zealand Carbon Farming Group ('NZCF')			General comments	Mechanical land preparation	Support		Does not oppose inclusion of a definition for 'Mechanical land preparation' in NRP as the term should be consistently understood where it is used in provisions of NRP. Notes 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.	Retain definition of 'Mechanical land preparation' as notified.		Accept in part
S263.016	New Zealand Carbon Farming Group ('NZCF')	FS23.387	Forest & Bird	General comments	Mechanical land preparation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S263.017	New Zealand Carbon Farming Group ('NZCF')			8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser	Amend		Does not oppose the definition of 'Registered forestry adviser' subject to relief sought in this submission. Considers the definition inappropriately narrows advice that may be given by a person registered under the Forests (Registration of Log Traders and Forest Advisers) Amendment Act 2020. That is, section 63M of the Forests (Registration of Log Traders and Forest Advisers) Amendment Act 2020 includes a more fulsome list of matters on which advice may be given. Notes that no rationale for narrowing these matters in the proposed definition is given in the Section 32 Report. Considers to extent that a definition is necessary, the definition should include all matters in Section 63M and seeks that definition is amended accordingly.	Amend definition of 'Registered forestry adviser' as follows: "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: (a) the establishment, management, or protection of a forest, and (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 (c) the beneficial effects of forests,		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									including how they contribute to environmental outcomes.”		
S263.017	New Zealand Carbon Farming Group ('NZCF')	FS23.388	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.018	New Zealand Carbon Farming Group ('NZCF')			8 Whaitua Te Whanganui-a-Tara	Replanting	Support		Does not oppose inclusion of a definition of 'Replanting' in NRP as term should be consistently understood where it is used in provisions of NRP. . Notes the proposed definition refers to NESPF 2017 and as such does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain definition of 'Replanting' as notified.		Accept in part
S263.018	New Zealand Carbon Farming Group ('NZCF')	FS23.389	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Replanting		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.019	New Zealand Carbon Farming Group ('NZCF')			8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Support		Submitter does not oppose inclusion of a definition of 'Replanting' in NRP as term should be consistently understood where it is used in provisions of NRP. Notes the proposed definition refers to NESPF 2017 and as such does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain definition of 'Vegetation clearance' as notified.		Accept in part
S263.019	New Zealand Carbon Farming Group ('NZCF')	FS23.390	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.020	New Zealand Carbon Farming Group ('NZCF')			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Submitter opposes Policy WH.P28. More specifically, in terms of clause (a), submitter seeks the clause is deleted 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 the NESPF is not set out in the manner required by section 32(4);- The practical implications of the mapping and associated provisions have not been considered, including the 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 terms of clause (b), NZCF notes that planning and implementing erosion and sediment control is a normal part of forest operations. The NESPF includes requirement to manage erosion and sediment in any case. These Regulations have been updated in the NESCF. NZCF seeks limited amendments to clause (b) to reflect current best practice. NZCF does not support clause (c) of the Policy because preventing establishment of plantation forestry, or the	Amend Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry “Reduce discharges of sediment from plantation forestry by: (a) identifying highest erosion risk land (plantation forestry), and (b) improving management of plantation forestry by requiring erosion and sediment management plans to be prepared and complied with, and (c) requiring that on highest erosion risk land (plantation forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forest.”		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								continuation of plantation forestry, in identified areas;- is not supported by evidence and may not result in the 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 the 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 the New Zealand's Emissions Reduction Plan and New Zealand's National Adaptation Plan.			
S263.020	New Zealand Carbon Farming Group ('NZCF')	FS23.391	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.021	New Zealand Carbon Farming Group ('NZCF')			##	8.3.4 Land uses	Oppose		Notwithstanding the primary relief sought, submitter notes the 'Note' that immediately precedes Rule WH-R20 in PC1 appears to refer to Regulations of the NES-FW in error. If this is the case, subject to matters raised elsewhere in this submission, submitter seeks the 'Note' be amended to reference NESPF 2017.	Amend the Note that precedes Rule WH-R20 as follows: "Note Rules WH.R20, WH.R21 and WH.R22 prevail over the following Regulations of the Resource Management (National Environmental Standards for Freshwater Production Forestry) Regulations 202017: Part 2 Regulation of plantation forestry activities Subpart 1—Afforestation Regulations 9(2), 10, 14(3), 15(5), 16(2), 17(1), 17(3), and 17(4) Subpart 3—Earthworks Regulations 24 to 35 Subpart 6—Harvesting Regulation 64(1) and (2), as far as these apply to a Regional Council Regulations 63(2) and (3), 64(3), 65 to 69, 70(3) and (4), and 71 Subpart 7—Mechanical land preparation Regulations 73(2), 74, and 75 Subpart 8—Replanting Regulations 77(2), 78(2) and (3), 80, and 81(3) and (4) Subpart 9—Ancillary activities Regulations 89 and 90 Regulation 95, as far as this applies to a Regional Council Subpart 10—General provisions (including discharges of sediment) Regulation 97(1)(a), (b), (c), (f) and (g)."		Accept in part
S263.021	New Zealand Carbon Farming Group ('NZCF')	FS23.392	Forest & Bird	##	8.3.4 Land uses		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S263.022	New Zealand Carbon Farming Group ('NZCF')			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Notwithstanding primary relief sought, submitter considers the Section 32 Report does not establish that controlled activity status is necessary or appropriate where standards in the proposed Rule are met. Notes the purpose of PC1 is to reduce sediment in rivers and complying with 'standards' will achieve this such that the need for a resource consent to confirm compliance is unnecessarily onerous. Submitter considers 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. Does not support 'standard' in clause (d) because:- frequency of Council monitoring is not sufficiently certain, that is, considers the standard could inappropriate result in a circumstance where, if an exceedance is detected, and then Council does not undertake further monitoring for some time, a more stringent activity status applies (for want of further monitoring by a third party);-it is not appropriate for a more stringent activity status to apply in circumstances where activities of third parties in catchment cause an exceedance, rather it is more appropriate to establish standards for discharges at source and confine standards to matters the party undertaking the activity can control.	Amend Rule WH.R20 as follows:"WH.R20: Plantation forestry – permitted controlled activityThe discharge of sediment to a surface waterbody associated with aAfforestation, 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:(a) the land is not high erosion risk land (pasture) or highest erosion risk land (pasture) that was in pasture or scrub on 30 October 2023, and(b) an erosion and sediment management plan has been prepared in accordance with Schedule 34 (forestry plan), certified by a registered forestry adviser and submitted with the application for resource consent under this rule, and(c) the concentration of total suspended solids in the discharge from the plantation forestry shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or(ii) 30% in any other river, and(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.Matters of control1. 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 located2. The area, location and methods employed in the plantation forestry3. 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 plan4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S263.022	New Zealand Carbon Farming Group ('NZCF')	FS23.393	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.023	New Zealand Carbon Farming Group ('NZCF')			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Amend		Submitter notes the purpose of PC1 is to reduce sediment in rivers. Submitter considers 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. Seeks rule is amended to directly relate to purpose of PC1. Submitter is of the view that potential adverse effects of a discharge of sediment to a river, are sufficiently known and confined such that restricted discretionary activity status is the most appropriate activity status to apply in circumstances where standards in Rule WH.R20 are not met. Suggests the 'matters of control' in Rule WH.R20 are appropriate to apply as 'matters of discretion'.	Amend Rule WH.R21 as follows: "Rule WH.R21: Plantation forestry – restricted discretionary activity The discharge of sediment to a surface water body associated with aAfforestation, 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 restricted discretionary activity. Matters of discretion1. 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 located2. The area, location and methods employed in the plantation forestry3. 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 plan4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."		Reject
S263.023	New Zealand Carbon Farming Group ('NZCF')	FS23.394	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S263.024	New Zealand Carbon Farming Group ('NZCF')			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Oppose		Submitter opposes Rule in its entirety for the following reasons: Considers 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. With reference to Royal Forest & Bird Protection Society of New Zealand Inc v Whakatane District Council [2017] NZEnvC 51 at [62] the Environment Court noted, the complexity of plan making means the classification of activities is likely to require specific analysis of effects	Delete Rule WH-R22 in its entirety, as follows: "Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity Afforestation, earthworks, or mechanical land preparation for plantation forestry on highest erosion risk land (plantation forestry) is a prohibited activity."		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								of that activity against the particular objectives and policies which relate to the activity being assessed. The Court also emphasised that: Submitter is not aware of any operative objective or policy that directs such a stringent outcome. Further, no analysis of the nature described has been completed or documented in this instance. Considers the Rule overly stringent in circumstances where activities addressed by the Rule 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. Considers the Rule could result in an increase in discharges of sediment to rivers because, as acknowledged Plan, continued use of the identified area for forestry is likely to reduce discharges over life of a forest to a greater extent than other uses of the land, including retirement. Considers applying prohibited activity status to one use of highest erosion risk land is not even-handed as other potential land uses are not similarly managed. A more even-handed rule would be more directly related to the potential adverse effects of activities. That is, prohibiting the effects of discharges to freshwater, rather than prohibiting an activity. Considers the purpose of the rule is to reduce sediment in rivers, yet the rule prevents an activity as a whole in an ill-defined area. Considers that no direct causal relationship has been established for the activity and area such that prohibited activity status is appropriate or necessary. Considers 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. Considers prohibited activity status is contrary to New Zealand's Emissions Reduction Plan and New Zealand's National Adaptation Plan.			
S263.024	New Zealand Carbon Farming Group ('NZCF')	FS23.395	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.025	New Zealand Carbon Farming Group ('NZCF')			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Submitter opposes Policy P.P26 for all of the reasons set out in this submission. More specifically, in terms of clause (a), the submitter seeks that the clause is deleted because:- the rationale for, and appropriateness of, 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 manner required by section 32(4);- 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 terms of clause (b), submitter notes that planning and implementing erosion and sediment control is a normal part of forest operations. Notes the NESPF includes requirement to manage erosion and sediment in any case and these Regulations have been updated in the NESCF. Seeks	Amend Policy P.P26 as follows: "Policy P.P26: Achieving reductions in sediment discharges from plantation forestry Reduce discharges of sediment from plantation forestry by: (a) identifying highest erosion risk land (plantation forestry), and (b) improving management of plantation forestry by requiring erosion and sediment management plans to be prepared and complied with, and (c) requiring that on highest erosion risk land (plantation forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forest."		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								limited amendments to clause (b) to reflect current best practice. Does not support clause (c) because preventing establishment of plantation forestry, or continuation of plantation forestry, in identified areas:- 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.			
S263.025	New Zealand Carbon Farming Group ('NZCF')	FS23.396	Forest & Bird	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S263.026	New Zealand Carbon Farming Group ('NZCF')			##	9.3.4 Land uses	Oppose		Notwithstanding primary relief sought, submitter notes the 'Note' that immediately precedes Rule P.R19 in PC1 appears to refer to Regulations of NES-FW in error. If this is the case, subject to matters raised elsewhere in this submission, submitter seeks the 'Note' be amended to reference NESPF 2017.	Amend the Note that precedes Rule P.R19 and follows: "Note Rules P.R19, P.R20 and P.R21 prevail over the following Regulations of the Resource Management (National Environmental Standards for Freshwater Production Forestry) Regulations 202017: Part 2 Regulation of plantation forestry activities Subpart 1—Afforestation Regulations 9(2), 10, 14(3), 15(5), 16(2), 17(1), 17(3), and 17(4) Subpart 3—Earthworks Regulations 24 to 35 Subpart 6—Harvesting Regulation 64(1) and (2), as far as these apply to a Regional Council Regulations 63(2) and (3), 64(3), 65 to 69, 70(3) and (4), and 71 Subpart 7—Mechanical land preparation Regulations 73(2), 74, and 75 Subpart 8—Replanting Regulations 77(2), 78(2) and (3), 80, and 81(3) and (4) Subpart 9—Ancillary activities Regulations 89 and 90 Regulation 95, as far as this applies to a Regional Council Subpart 10—General provisions (including discharges of sediment) Regulation 97(1)(a), (b), (c), (f) and (g)."		Accept in part
S263.026	New Zealand Carbon Farming Group ('NZCF')	FS23.397	Forest & Bird	##	9.3.4 Land uses		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										submission points and specific relief.	
S263.027	New Zealand Carbon Farming Group ('NZCF')			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		<p>Notwithstanding primary relief sought, submitter considers the Section 32 Report does not establish that controlled activity status is necessary or appropriate where standards in the Rule are met. Notes the purpose of PC1 is to reduce sediment in rivers and complying with 'standards' will achieve this such that the need for a resource consent to confirm compliance is unnecessarily onerous. Further, consistent with the purpose of PC1, submitter considers Rule goes beyond management of discharges by managing activities more generally despite there not always being a direct causal relationship and without consideration of methods that do not result in discharges. Seeks Rule is amended to directly relate to purpose of PC1. Does not support 'standard' in clause (d) because:- frequency of Council monitoring is not sufficiently certain. Considers the standard could inappropriate result in a circumstance where, if an exceedance is detected, and Council does not undertake further monitoring for some time, a more stringent activity status is applies (for want of further monitoring by a third party);- considers it not appropriate for a more stringent activity status to apply in circumstances where activities of third parties in catchment cause an exceedance, rather it is more appropriate to establish standards for discharges at source and confine standards to the matters the party undertaking the activity can control.</p>	Amend Rule P.R19 as follows: "Rule P.R19: Plantation forestry – permitted controlled activity 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: (a) the land is not high erosion risk land (pasture) or highest erosion risk land (pasture) that was in pasture or scrub on 30 October 2023, and (b) an erosion and sediment management plan has been prepared in accordance with Schedule 34 (forestry plan), certified and submitted with the application for resource consent under this rule, and (c) the concentration of total suspended solids in the discharge from the plantation forestry shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (d) the most recent 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. Matters of control 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 2. The area, location and methods employed in the plantation forestry 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 4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S263.027	New Zealand Carbon Farming Group ('NZCF')	FS23.398	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.028	New Zealand Carbon Farming Group ('NZCF')			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Oppose		Notwithstanding the primary relief sought, submitter notes purpose of PC1 is to reduce sediment in rivers. Considers Rule goes beyond management of discharges by managing activities more generally despite there not always being a direct causal relationship and without consideration of methods that do not result in discharges. Seeks Rule is amended to directly relate to purpose of PC1.Considers potential adverse effects of a discharge of sediment to a river, the considerations that are relevant to the adverse effect, are sufficiently known and confined such that restricted discretionary activity status is the most appropriate activity status to apply in circumstances where the standards in Rule P.R19 are not met. Submitter suggests the 'matters of control' in Rule P.R19 are appropriate to apply as 'matters of discretion'.	Amend Rule P.R20 as follows:"Rule P.R20: Plantation forestry – restricted discretionary activityThe discharge of sediment to a surface waterbody associated with aAfforestation, 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 P.R19 is a restricted discretionary activity.Matters of discretion1. 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 located2. The area, location and methods employed in the plantation forestry3. 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 plan4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."		Reject
S263.028	New Zealand Carbon Farming Group ('NZCF')	FS23.399	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S263.029	New Zealand Carbon Farming Group ('NZCF')			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Oppose		Notwithstanding primary relief, submitter opposes Rule P.R21 in its entirety for the following reasons: Submitter considers that 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 (prohibited activity) to plantation forestry in particular locations. With reference to Royal Forest & Bird Protection Society of New Zealand Inc v Whakatane District Council [2017] NZEnvC 51 at [62] the Environment Court noted, the complexity of plan making means the classification of activities is likely to	Delete Rule P.R21 in its entirety as follows:"Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity Afforestation, earthworks, or mechanical land preparation for plantation forestry on highest erosion risk land (plantation forestry) is a prohibited activity."		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								require specific analysis of effects of that activity again the particular objectives and policies which relate to the activity being assessed. Submitter is not aware of any operative objective or policy that directs such a stringent outcome. Further, no analysis of the nature described has been completed or documented in this instance. Considers the Rule overly stringent in circumstances where activities addressed by the Rule can be undertaken in a way that does not result in sediment discharges to rivers. No consideration has been given to afforestation being undertake in a manner that does not result in discharges. Considers the Rule could result in an increase in discharges of sediment to rivers because, as acknowledged Plan, continued use of the identified area for forestry is likely to reduce discharges over life of a forest to a greater extent than other uses of the land, including retirement. Considers applying prohibited activity status to one use of highest erosion risk land is not even-handed as other potential land uses are not similarly managed. A more even-handed rule would be more directly related to the potential adverse effects of activities. That is, prohibiting the effects of discharges to freshwater, rather than prohibiting an activity. Considers the purpose of the rule is to reduce sediment in rivers, yet the rule prevents an activity as a whole in an ill-defined area. Considers that no direct causal relationship has been established for the activity and area such that prohibited activity status is appropriate or necessary. Considers 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. Considers prohibited activity status is contrary to New Zealand's Emissions Reduction Plan and New Zealand's National Adaptation Plan.			
S263.029	New Zealand Carbon Farming Group ('NZCF')	FS23.400	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.030	New Zealand Carbon Farming Group ('NZCF')			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Amend		Does not support clause B of Schedule 34 because the clause:-is inappropriately expressed as a standard or rule and could be understood to be an absolute requirement;-in (4) appears to direct a single future use of the subject land and, in doing so, inappropriate erodes the ability for a landowner to make use of their property;-appears to have inappropriately (and without evidence) formed a view woody revegetation is the only means to reduce sediment discharges to water. Supports clause D to extent that ability to amend Erosion and Sediment Management Plan is provided. Considers providing ability to make amendments is necessary to respond effectively and efficiently to site requirements.	Amend Schedule 34 as follows: "A Purpose of the Erosion and Sediment Management Plan The purpose of an Erosion and Sediment Management Plan is: (a) to identify the risks of the loss of sediment from the plantation forestry to waterbodies, and (b) identify management practices and mitigation measures to address these risks. B Management objectives The Erosion and Sediment Management Plan must demonstrate that the measures adopted to address the identified risks are designed to will: 1. minimise sediment loss to waterbodies from activities in the		Reject

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									<p>plantation forest by adopting, as a minimum, good management practice, and</p> <p>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</p> <p>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, and</p> <p>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.</p> <p>...</p> <p>D Amendment of Erosion and Sediment Management Plan</p> <p>Unless otherwise required by the Wellington Regional Council in accordance with any conditions of any resource consent held in respect of the plantation forest or property, changes can be made to the Erosion and Sediment Management Plan without triggering the need for a consent review or review by a registered forestry adviser provided:</p> <p>(a) the purpose of the Erosion and Sediment Management Plan will continue to be achieved, and</p> <p>(b) the change to the Erosion and Sediment Management Plan does not contravene any mandatory requirement of any resource consent held in respect of the plantation forest or property, or any requirement of the Plan that is not already authorised, and</p> <p>(c) the nature of the change is documented in writing and made available to the Wellington Regional Council."</p>		
S263.030	New Zealand Carbon Farming Group ('NZCF')	FS23.401	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.031	New Zealand Carbon Farming Group ('NZCF')			13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	Oppose		Does not support 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	Delete Map 92 and replace with the erosion susceptibility classification in the NESPF throughout PC1.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								and topography may result in larger areas no longer being viable for forestry uses.			
S263.031	New Zealand Carbon Farming Group ('NZCF')	FS23.402	Forest & Bird	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S263.032	New Zealand Carbon Farming Group ('NZCF')			13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Oppose		Does not support 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.	Delete Map 95 and replace with the erosion susceptibility classification in the NESPF throughout PC1.		Accept in part
S263.032	New Zealand Carbon Farming Group ('NZCF')	FS23.403	Forest & Bird	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S273.007	Robert Pavis-Hall, Gaynor Rowsell, Katie Norman, Megan Norman			General comments	General comments - plantation forestry	Oppose		Notes that 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.	Withdraw PC1 until new government has decided fate of PC1 .		Reject
S275.027	Waka Kotahi NZ Transport Agency			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Notes that NZTA need to remove vegetation to provide for a safe transport network and the requirement to obtain a consent for any removal on high erosion risk land is overly onerous and would give rise to unacceptable safety effects. Suggests a permitted activity status for limited removals subject to appropriate performance standards would achieve safe outcomes as was provided for under the operative provisions. Considers a restricted discretionary activity should be provided.	Provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
S275.027	Waka Kotahi NZ Transport Agency	FS23.721	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S275.027	Waka Kotahi NZ Transport Agency	FS47.235	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking	Allow	Allow S275.027 by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area	Reject

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								retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;		permitted to be cleared to be consistent with operative Rule R104.	
S275.028	Waka Kotahi NZ Transport Agency			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Notes that NZTA need to remove vegetation to provide for a safe transport network and the requirement to obtain a consent for any removal on high erosion risk land is overly onerous and would give rise to unacceptable safety effects. Suggests a permitted activity status for limited removals subject to appropriate performance standards would achieve safe outcomes as was provided for under the operative provisions.	Provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
S275.028	Waka Kotahi NZ Transport Agency	FS23.722	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S275.028	Waka Kotahi NZ Transport Agency	FS47.243	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support in part	Meridian agrees that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;	Allow in part	Allow S275.028 by increasing the permitted activity Rule WH.R17 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule WH.R18 to reflect this.	Accept in part
S275.029	Waka Kotahi NZ Transport Agency			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	Amend		Notes that NZTA need to remove vegetation to provide for a safe transport network and the requirement to obtain a consent for any removal on high erosion risk land is overly onerous and would give rise to unacceptable safety effects. Suggests a permitted activity status for limited removals subject to appropriate performance standards would achieve safe outcomes as was provided for under the operative provisions.	Provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
S275.029	Waka Kotahi NZ Transport Agency	FS23.723	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S275.029	Waka Kotahi NZ Transport Agency	FS47.373	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.		Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;	Allow	Allow S275.029 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.	Reject
S275.030	Waka Kotahi NZ Transport Agency			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest	Amend		Notes that NZTA need to remove vegetation to provide for a safe transport network and the requirement to obtain a consent for any removal on high erosion risk land is overly onerous and would	Provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network. Any further alternative or consequential		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					erosion risk land – controlled activity.			give rise to unacceptable safety effects. Suggests a permitted activity status for limited removals subject to appropriate performance standards would achieve safe outcomes as was provided for under the operative provisions.	relief as may be necessary to fully achieve the relief sought.		
S275.030	Waka Kotahi NZ Transport Agency	FS23.724	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S275.030	Waka Kotahi NZ Transport Agency	FS47.383	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support in part	Meridian agrees that permitted activity provision should be made for purposes other than those currently listed in Rule P.R16. The permitted activity rule should provide for vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;	Allow in part	Allow S275.030 by increasing the permitted activity Rule P.R16 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule P.R17 to reflect this.	Accept in part
S275.049	Waka Kotahi NZ Transport Agency			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Amend		Supports the general principle of a management plan but considers the range of detailed matter is overly prescriptive, especially where combined with rules (eg WH.R18) that are required to be prepared in accordance with Schedule 33 (ie. suggesting non-compliance with the detail of Schedule 33 may lead to a change in activity status). Suggests a range of matters appear to be overly onus or uncertain. Notes B Management Objectives (b) requires pre-development levels of discharge, regardless of current land use. Notes B Management Objectives (d) assumes land use will be revegetated but this may not be the case where new infrastructure or buildings are proposed. Notes Operating systems and practices (c) appears to be mor focused on forestry activities. Considers Maps (b) (viii) an inappropriately high level of detail for (eg) 300m ² of vegetation clearance but is perhaps suitable for large scale clearance.	Move to a guideline and/or reassess the detail within Schedule 33 with inclusion of prefacing statements indicating that the Management Plan should reflect likely effects of the proposal. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
S275.049	Waka Kotahi NZ Transport Agency	FS23.743	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S279.008	KiwiRail Holdings Limited (KiwiRail)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
S279.008	KiwiRail Holdings Limited (KiwiRail)	FS27.1072	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S279.008	KiwiRail Holdings Limited (KiwiRail)	FS47.244	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for vegetation clearance for all regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;	Disallow	Disallow S279.008.	Accept
S279.008	KiwiRail Holdings Limited (KiwiRail)	FS47.384	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule P.R16. The permitted activity rule should provide for vegetation clearance for all regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;	Disallow	Disallow S279.008.	Accept
S279.009	KiwiRail Holdings Limited (KiwiRail)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
S279.009	KiwiRail Holdings Limited (KiwiRail)	FS27.1073	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								“planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S279.009	KiwiRail Holdings Limited (KiwiRail)	FS47.249	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Disallow	Disallow S279.009 and reinstate operative NRP Rule R106.	Accept
S279.020	KiwiRail Holdings Limited (KiwiRail)			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
S279.020	KiwiRail Holdings Limited (KiwiRail)	FS27.1084	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S279.020	KiwiRail Holdings Limited (KiwiRail)	FS47.374	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land—permitted activity.		Oppose	For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;	Disallow	Disallow S279.020.	Accept
S279.021	KiwiRail Holdings Limited (KiwiRail)			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
S279.021	KiwiRail Holdings Limited (KiwiRail)	FS27.1085	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S279.022	KiwiRail Holdings Limited (KiwiRail)			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
S279.022	KiwiRail Holdings Limited (KiwiRail)	FS27.1086	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S279.022	KiwiRail Holdings Limited (KiwiRail)	FS47.388	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Disallow	Disallow S279.022 and reinstate operative NRP Rule R106.	Accept
S280.002	.Peter Handford			General comments	General comments - plantation forestry	Not Stated		Considers forestry management can be applied where this a strong focus on environmental outcomes such as soil and water protection and biodiversity	Not stated.		No recommendation
S280.002	.Peter Handford	FS50.115	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and agrees that Proposed Plan Change 1 fails to consider management practices and the outcomes achieved by the NESCF.	Allow	Not stated	No recommendation
S280.003	.Peter Handford			General comments	General comments - plantation forestry	Not Stated		Concerns PC1 creates blanket exclusion for forestry rather than set out measurable outcomes across all land uses with identified monitoring approaches	Not stated.		No recommendation
S280.003	.Peter Handford	FS50.116	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and considers that the effects of activities should be managed, rather than the activities prevented.	Allow	Not stated	No recommendation
S280.004	.Peter Handford			General comments	General comments - plantation forestry	Not Stated		Concerns PC1 creates a blanket exclusion for “highest erosion risk” areas without recognising range of forest management options. Considers this removes potential for forest management to of provide ecosystem services including biodiversity, carbon sequestration, soil and water protection and recreation. Considers Innovative and environmentally sensitive forest management approaches should be facilitated and encouraged as low impact forestry management is possible without negative impacts	Not stated.		No recommendation
S280.004	.Peter Handford	FS50.117	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and considers that the effects of activities should be managed, rather than the activities prevented.	Allow	Not stated	No recommendation
S285.022	Civil Contractors New Zealand			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Support		Supports good sediment control, but suggests engagement with contractors responsible for vegetation clearance should be undertaken by GWRC to clarify their responsibilities under the new plan. GWRC should work with industry bodies to compose	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								and circulate good information on how to prepare sediment control plans.			
S285.022	Civil Contractors New Zealand	FS35.022	Goodman Contractors Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	I also support the rest of the points made in the Civil Contractors New Zealand submission, and ask you to consider the impacts this plan change will have on horizontal construction across the region, which will increase costs across the board, including housing, transport and water construction. Overall, I feel direct consultation with the civil construction industry has been absent in the creation of this plan, and is required to make sure the Natural Resources Plan is fit for purpose. I also feel that the consultation process is very difficult to follow, ruling most contractors out of having a say. Accordingly, I request the plan change does not go ahead.	Allow	Plan change 1 does not go ahead	No recommendation
S285.022	Civil Contractors New Zealand	FS49.022	Multi Civil Contractors Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	Not stated	Allow	Request that plan change does not go ahead	No recommendation
S285.023	Civil Contractors New Zealand			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Not Stated		Supports good sediment control, but suggests engagement with contractors responsible for vegetation clearance should be undertaken by GWRC to clarify their responsibilities under the new plan. GWRC should work with industry bodies to compose and circulate good information on how to prepare sediment control plans.	Not stated		No recommendation
S285.023	Civil Contractors New Zealand	FS35.023	Goodman Contractors Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	I also support the rest of the points made in the Civil Contractors New Zealand submission, and ask you to consider the impacts this plan change will have on horizontal construction across the region, which will increase costs across the board, including housing, transport and water construction. Overall, I feel direct consultation with the civil construction industry has been absent in the creation of this plan, and is required to make sure the Natural Resources Plan is fit for purpose. I also feel that the consultation process is very difficult to follow, ruling most contractors out of having a say. Accordingly, I request the plan change does not go ahead.	Allow	Plan change 1 does not go ahead	No recommendation
S285.023	Civil Contractors New Zealand	FS49.023	Multi Civil Contractors Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	Not stated	Allow	Request that plan change does not go ahead	No recommendation
S286.059	Taranaki Whānui			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Support		Support in principle.	Retain as notified.		Reject
S286.059	Taranaki Whānui	FS24.059	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Reject
S286.081	Taranaki Whānui			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Support		Support in principle.	Retain as notified.		Reject
S286.081	Taranaki Whānui	FS24.081	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Reject
S286.081	Taranaki Whānui	FS47.236	Meridian Energy Limited	8 Whaitua Te	Rule WH.R17: Vegetation		Oppose	For the reasons explained above, Meridian considers the area limit should be increased for regionally	Disallow	Disallow S286.081.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	clearance on highest erosion risk land – permitted activity.			significant infrastructure to match the permitted activity R104 limit in the operative NRP;			
S286.082	Taranaki Whānui			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Support		Support in principle.	Retain as notified.		Reject
S286.082	Taranaki Whānui	FS24.082	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Reject
S286.082	Taranaki Whānui	FS47.245	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;	Disallow	Disallow S286.082.	Accept
S286.083	Taranaki Whānui			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Support		Support in principle.	Retain as notified.		Reject
S286.083	Taranaki Whānui	FS24.083	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Reject
S286.083	Taranaki Whānui	FS47.250	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;	Disallow	Disallow S286.083 and reinstate operative NRP Rule R106.	Accept
S286.084	Taranaki Whānui			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Support		Support in principle.	Retain as notified.		Reject
S286.084	Taranaki Whānui	FS24.084	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Reject
S286.085	Taranaki Whānui			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Support		Support in principle.	Retain as notified.		Reject
S286.085	Taranaki Whānui	FS24.085	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Reject
S286.086	Taranaki Whānui			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Support		Support in principle.	Retain as notified.		Reject
S286.086	Taranaki Whānui	FS24.086	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Reject
S288.001	China Forest Group			2 Interpretation	General comments - overall	Not Stated		"Considers several aspects of PC1 are poorly founded and require considerable research and explanation. Notes the following points of concern: -	<table><tbody><tr><td class="xl64">Remove the sections of PC1 related to forestry.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Company New Zealand Ltd							the consultation/representation process is flawed and short-changed, directly impacting sectors. - controls extend beyond the recommendations of whitua committee reports. - rules that apply to forestry that are not supported by GWRC data and past records. - the rules are unable to be implemented without loss of estate due to the spatial logistics of harvesting and roading. - there has been no consideration of the ETA and other cost liabilities contingent upon non-replant of land retired from PC1 rules. - duties under the NES Regulation 6 Stringency insufficiently executed. - the s32 analysis is inadequate. "	Align rules to those of the NES-CF. Work collaboratively with industry participants and land-owners to implement good practice, and where needed, engage on how to refine and plan land management outcomes that will fulfil the objectives without excessive bureaucracy and cost.		
S288.001	China Forest Group Company New Zealand Ltd	FS23.025	Forest & Bird	2 Interpretation	General comments - overall		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S288.001	China Forest Group Company New Zealand Ltd	FS25.107	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	2 Interpretation	General comments - overall		Support in part	Submission is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF	Allow in part	Align rules relating to forestry with requirements of the NES-CF	Accept in part
S288.001	China Forest Group Company New Zealand Ltd	FS50.012	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. That said, NZCF notes that Rules should not duplicate a National Environmental Standard. NZCF welcomes any opportunity for consultation on Proposed Plan Change 1.	Allow	Not stated	Accept in part
S288.002	China Forest Group Company New Zealand Ltd			2 Interpretation	General comments - consultation	Not Stated		"Acknowledges the necessity of PC1 to respond to the requirements of the NPS-FW, and acknowledges the purpose of the whitua committees to resolve issues before plans or rules were made. However, notes there was only one identifiable party with forestry expertise in Te Awarua-o-Porirua Whitua until 2018, and no such expertise within Te Whitua te Whanganui-a-Tara. 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. Notes replanting on nominated high risk land is not included as a non-complying use, but is intended to be rectified by way of submissions by GWRC. Considers it inappropriate to insert rules that have not been included in public documentation. Considers it is bad faith to notify significant changes from the NRP with limited time to make submissions. Considers forestry, and sectors that may potentially be significantly adversely affected, have been under-represented in development of the PC1 outcomes. Considers direct engagement with the sector should have been undertaken to understand the implications and practicality of the rules. No concerns raised by the submitter with the recommendations of the whitua committees, noting the expectations of those	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								recommendations that the sector and GWRC would work within the existing framework to achieve water quality objectives. Considers the outcomes are materially different, and notes the timeframe for the submission process limited for the required research and engagement needed. Concerned submissions are used to rectify oversights not included in PC1. "			
S288.002	China Forest Group Company New Zealand Ltd	FS23.026	Forest & Bird	2 Interpretation	General comments - consultation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.003	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Notes major disparities between the whitua committee recommendations and PC1 rules. Notes the TAP committee considered more stringent rules for forestry to achieve the sediment objectives, but concluded the permitted framework of NESPF should be given time to be implemented, and that understanding and mapping erosion prone land at the local whitua scale was important to inform future planning. Notes that no recommendations were made by the TAP that plantation forests should be retired, nor the need identified for stringency beyond the (then) NES-PF. Notes that while recognising potential water quality risks from forestry, neither whitua committee recommended an explicit need to retire areas of production forestry. Notes neither whitua committee considered a need for major strengthening of the regulatory regime, but rather recognised the (then) NES-PF and urged a focus on education, implementation, monitoring and enforcement where necessary. Notes the whitua recommendations sought close liaison between the sector and GWRC land management staff when looking at land use management planning around high-risk erosion sites. Notes neither whitua committee made recommendations to address an explicit link between forestry and water quality attribute standards or objectives.	Not stated		No recommendation
S288.003	China Forest Group Company New Zealand Ltd	FS23.027	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.003	China Forest Group Company New Zealand Ltd	FS50.013	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and considers that greater weight should be given to the whitua committee recommendations in the consideration of the necessity and appropriateness of Proposed Plan Change 1 provisions that relate to forestry.	Allow	Not stated	No recommendation
S288.004	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		"References data from monitoring sites and an ecological assessment which indicate very small proportions of the Pouewe Catchment-Horokiri have been exposed to potentially elevated levels of sedimentation above baseline from forestry activity, and that there is at least reasonable water quality. Considers it unlikely that forestry has led to the poor state of the Horokiri for the following reasons: - timing and scale of forestry activity - the small percentage of	Not stated		No recommendation

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								the catchment under harvest over the prior 20 years - large proportions of the catchment under closed canopy forest at any one time - the large percentage of the catchment under livestock management - immediate proximity of major highways and highway construction. "			
S288.004	China Forest Group Company New Zealand Ltd	FS23.028	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.005	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Cites aerial sequences and monitoring data which suggest the effects of harvesting have not been as significant as assumed, given harvesting and earthworks have been in train for an extended period until the latest published monitoring, and given assumed effects are expected to be cumulative downstream. Notes a survey which ranked the catchment as "average" and likely representative of fish diversity. Notes almost all harvesting and earthworks undertaken in the contributory forest was undertaken prior to the NES-PF/CF.	Not stated		No recommendation
S288.005	China Forest Group Company New Zealand Ltd	FS23.029	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.006	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Cites aerial sequences and monitoring data which suggest the effects of harvesting and earthworks have not been as significant as assumed, given harvesting and earthworks have been in train for an extended period until the latest published monitoring, and given assumed effects are expected to be cumulative downstream.	Not stated		No recommendation
S288.006	China Forest Group Company New Zealand Ltd	FS23.030	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.007	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Cites aerial sequences and monitoring data which suggest factors other than harvesting are influencing lowered attribute states in the Te Awa Kairangi forested mainstems-Pakaratahi.r catchment, given there is no harvesting activity and there is a dominance of closed canopy vegetation within the catchment.	Not stated		No recommendation
S288.007	China Forest Group Company New Zealand Ltd	FS23.031	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's	No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										submission points and specific relief.	
S288.008	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		"Cites aerial sequences and monitoring data which suggest it is unlikely that plantation forest activities are a major factor in poor clarity and MCI attribute states within the Te Awa Kairangi rural streams-Mangaroa catchment, given there are low suspended sediments and the low proportion of the total catchment subject to recent or long-term harvesting and earthworks. Considers the long length of the main stem of the catchment proceeding through pastoral and agricultural land use is a more likely explanation. Notes the tributaries that are under pine forest were modelled at a higher status than the main stem and while this may reflect the harvesting status at the time the modelling was done, it also reflects the established science that over a long time series, plantation forests will generate better water quality than current pastoral use. Notes an ecological report which detected the presence of fish, indicating that water quality in the small plantation tributaries are likely better than the main stem of the Mangaroa. "	Not stated		No recommendation
S288.008	China Forest Group Company New Zealand Ltd	FS23.032	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.009	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		"Recognises that forest harvesting and earthworks can locally and temporarily raise sediment levels during and immediately after operations. However, considers over the long-term, impacts on waterbodies are low and often trend towards baselines established for native forest areas. Notes forestry activities have been undertaken in preceding years in catchments displaying good water quality results. Notes harvesting occupies relatively small proportions of the total catchments for extended timeframes, and have not resulted in NoF attribute values declining below objectives. Further notes that due to the spatial layout of surrounds, expansion of plantations, other than onto farmland, is not possible. Notes council monitoring results in other catchments, particularly Horokiwi and Mangaroa, are relatively poor and while harvesting in portions of these catchments has been undertaken in recent years the proportions of the total catchment areas subject to harvest are low. Notes the waterbodies in these catchments pass through large proportions of pastoral agricultural land and in the case of the Horokiwi and its main tributary, remain close to long reaches of heavily used highway and the earthworks associated with the recently completed Transmission Gully SH1. Considers it is highly likely given the current status of the streams, 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. Considers the temporal effects of forestry in relation to land use contaminant effects have not been recognised. Considers 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	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								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. By definition that becomes a permanent 'pressure' change to the environment. "			
S288.009	China Forest Group Company New Zealand Ltd	FS23.033	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.010	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		"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. This includes first rotation planting that had no regulated riparian setbacks from streams or regulation related to harvesting around or over streams nor discharge permits. 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. Notes existing operations with constructive interactions between monitoring staff and forest management, including testing alternatives to achieve the best results possible. Notes 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. Considers past retirements and riparian exclusions from previous operations reflect the sentiment of the whaitua committees in respect of promoting good land use and land use decision making, education, and working with Council land managers to achieve good outcomes. Concerned that this existing work has not been recognised."	Not stated		No recommendation
S288.010	China Forest Group Company New Zealand Ltd	FS23.034	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	?
S288.011	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Considers there is no argument that earthworks at the time of harvest is the largest manageable contributor to sediment yield in forestry. These concerns were recognised in regulations of the NES-PF and NES-CF to target sediment generation, similar to the requirements of farm plans. Notes the requirement for erosion and sediment controls plans in Policy WH.P28(b), Rule WH.R20(b) and Schedule 34, which reference forest practice guides, which have had limited time to bed in. Notes that based on GWRC data, the state of stream water quality reflected the cumulative effects of activities predating the NES-PF. Considers the discharge standard of 100g/m3 does not relate to a particular stream attribute, topography, geology or soils of the whaitua. Considers the	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								standard 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. Considers the standard difficult to implement, does not deliver real-time feedback, and has no temporal component. Notes main methods for managing forestry earthworks as set out in forestry practice guides, and that discharges are largely diffuse. Considers the requirements for farm plans a corollary. Considers the visual clarity standard is more relevant to rural land use. Nevertheless, considers here is a perversity in the requirement for a lower decline in visual clarity in class 1 and schedule F1 rivers, as those rivers often come from areas inclusive of plantation forestry. Considers allowing higher clarity loss in lower quality rivers acknowledges continuation of higher levels of contaminants. 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.			
S288.011	China Forest Group Company New Zealand Ltd	FS23.035	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.012	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Considers there is little cognisance in PC1 of the spatial and temporal patterns of harvesting, and the influence this may or may not have on the attribute states of relevant catchments. Considers NPS-FW obligations have been relied on to avoid delaying actions notwithstanding incomplete information. Notes that from the data available, NoF targets were being met in catchments that are largely forested and where harvesting took place and are expected to continue to do so. Considers GWRC has overlooked that in catchments with a relatively small proportion of plantation, and where their reaches aligned with pastoral and urban infrastructure, there were poorer attribute results. Notes this conforms with NZ-wide trends that water quality attributes decline in order from undisturbed native forest, exotic forest, pastoral land use and urban. Considers GWRC has assumed that regulations for earthworks and harvesting under the NES-PF have no efficacy toward achieving the goals of the NPS-FW, 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. Considers GWRC have not considered that as forests progressed through their first to second rotations, normal practice and NES regulatory requirements saw provision of increased setbacks and retirement and reservation of problematic harvest areas. 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	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								or urgency for the whitua committees to recommend significant and stringent changes to the regulatory framework surrounding forestry.			
S288.012	China Forest Group Company New Zealand Ltd	FS23.036	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.012	China Forest Group Company New Zealand Ltd	FS50.014	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated alongside monitoring data.	Allow	Not stated	No recommendation
S288.013	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Concerned with the approach taken to define areas of "high erosion risk" and the application of those findings. Considers it impractical and will result in write-off of much larger areas than estimated by GWRC. Notes that predictions from cutover are likely to significantly overestimated yield in the universal erosion model. Notes research that confirms sediment contributions from poorly controlled earthworks outweigh those from the cutover. Concerned about the use of a lidar surface to inform the mapping of highly erosion prone areas, as lidar surface does not represent the underlying bedrock surface.	Not stated		No recommendation
S288.013	China Forest Group Company New Zealand Ltd	FS23.037	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.013	China Forest Group Company New Zealand Ltd	FS50.015	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF.	Allow	Not stated	No recommendation
S288.014	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Considers the erosion susceptibility layers are based on information that excludes geological considerations and has not been peer reviewed. Considers the 5m2 resolution of the underlying lidar and the method applied will invariably be wrong, and a poor predictor of stability in the field, leading to areas being retired that were not at risk of slipping, as well as areas not being retired that may suffer landsliding in severe weather events. Considers the methodology for "Highest Erosion Risk – Plantation" 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. Notes several factors which determine harvesting feasibility, resulting in more land needing to be retired than suggested in GWRC data. Estimates that in the estate GFG manages, anything from an average of 9% up to 18% might be retired due to PC1 rules. Notes recommendations from whitua committees that could be applied to forestry, including developing site and property level plans with landowners, and funding and support for sediment mitigation activities.	Not stated		No recommendation

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S288.014	China Forest Group Company New Zealand Ltd	FS23.038	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.014	China Forest Group Company New Zealand Ltd	FS50.016	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF. NZCF supports greater weight being given to the whaitua committee recommendations.	Allow	Not stated	No recommendation
S288.015	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Considers the total area of compulsory retirement could be substantially greater than assessed by GWRC. Concerned there is the potential for the total write-off of plantation sites, and that this should have been assessed in the s32 analysis.	Not stated		No recommendation
S288.015	China Forest Group Company New Zealand Ltd	FS23.039	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.015	China Forest Group Company New Zealand Ltd	FS50.017	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF agrees that the section 32 evaluation should consider the cost of the total area caused to be retired by the provisions of Proposed Plan Change 1.	Allow	Not stated	No recommendation
S288.017	China Forest Group Company New Zealand Ltd			General comments	General comments - plantation forestry	Not Stated		Considers the obligations under the ETS have not been given consideration. 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. 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. 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. Considers proposed compensation and assistance methods are practically worthless.	Not stated		No recommendation
S288.017	China Forest Group Company New Zealand Ltd	FS23.041	Forest & Bird	General comments	General comments - plantation forestry		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.018	China Forest Group Company New Zealand Ltd			2 Interpretation	General comments - current legislation	Not Stated		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. Considers GWRC's water quality data is insufficient and does not support the stringency upon forestry it seeks to	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								<p>apply. With respect to forestry activities, considers there is insufficient evidence to support the objectives and attribute limits sought. Notes some monitoring sites are already meeting attribute targets, and where not, the relative role of forestry activity is small. Considers drivers for poor quality likely arise from the extended proximity of reaches to agricultural activity, major highways and urban and semi-rural development. Notes it is unclear how an “equitable” share based on area aligns with an effects-based response to partitioning sediment budget against land uses. Considers the proposed rules are unjustified due to well-established knowledge that production forests are likely to produce more sediment during harvest than pastoral agriculture on the same landform but return to near natural baselines shortly thereafter; and nationwide consistency of trends across land use of declining water quality across most attributes from native forest, exotic forest, pastoral agriculture, cropping and urban. 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. Concerned 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. Considers that at the time of the deliberations of the whitua committees, any effects on water in the whitua that could have been attributed to forestry activity were a cumulative summation of previous years of activity predating the NES-PF/CF. Disagrees that the NES-PF/CF allows activities as permitted and does not enable control over operations, noting several mechanisms for control under the NES-PF/CF. Considers the recommendations of the whitua committee should be reflected, and effort devoted towards understanding industry practice guides, working with the sector, and focusing on 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>			
S288.018	China Forest Group Company New Zealand Ltd	FS23.042	Forest & Bird	2 Interpretation	General comments - current legislation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.019	China Forest Group Company New Zealand Ltd			2 Interpretation	General comments - current legislation	Not Stated		Concerned the section 32 report does not adequately demonstrate the need for the stringency proposed in PC1. Submitter references parts of the section 32 analysis which they disagree with. Notes 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. Concerned GWRC have undertaken their section 32 analysis on the basis of a value judgement comparison between their 'preferred' option being PC1, the 'status quo' and an alternative with	Not stated		No recommendation

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								additional measures which involves option 1 plus a ""exposed area"" regulation.			
S288.019	China Forest Group Company New Zealand Ltd	FS23.043	Forest & Bird	2 Interpretation	General comments - current legislation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.019	China Forest Group Company New Zealand Ltd	FS50.018	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF supports the submission for the reasons given and similarly considers that the section 32 evaluation does not demonstrate the appropriateness or necessity for the forestry related provisions in Proposed Plan Change 1.	Allow	Not stated	No recommendation
S288.020	China Forest Group Company New Zealand Ltd			2 Interpretation	General comments - overall	Not Stated		The submitter has provided their own detailed response to the options assessment of costs, benefits and efficiency and effectiveness in pages 39-43 of their original submission.	Not stated		No recommendation
S288.020	China Forest Group Company New Zealand Ltd	FS23.044	Forest & Bird	2 Interpretation	General comments - overall		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	No recommendation
S288.021	China Forest Group Company New Zealand Ltd			2 Interpretation	Afforestation	Amend		Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).		Accept
S288.021	China Forest Group Company New Zealand Ltd	FS23.045	Forest & Bird	2 Interpretation	Afforestation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.023	China Forest Group Company New Zealand Ltd			2 Interpretation	Erosion and sediment management plan	Amend		Considers separate schedules creates confusion, noting there is overlap between existing NES-CF requirements and PC1.	Work to NES-CF schedule 4 & 5. Avoid cross-over and overlap with existing processes developed under the NES-CF.		Accept in part
S288.023	China Forest Group Company New Zealand Ltd	FS23.047	Forest & Bird	2 Interpretation	Erosion and sediment management plan		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.023	China Forest Group Company New Zealand Ltd	FS25.108	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	2 Interpretation	Erosion and sediment management plan		Support	Submission is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF	Allow	Use NES-CF schedule 4 & 5 for erosion and sediment plans relating to commercial forestry	Accept in part

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S288.024	China Forest Group Company New Zealand Ltd			General comments	Harvesting	Amend		Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).		Accept
S288.024	China Forest Group Company New Zealand Ltd	FS23.048	Forest & Bird	General comments	Harvesting		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.025	China Forest Group Company New Zealand Ltd			General comments	Highest erosion risk land (woody vegetation)	Oppose		Considers the map process inappropriate for purpose and unjustified.	Delete. Consult properly and work with industry.		Accept
S288.025	China Forest Group Company New Zealand Ltd	FS23.049	Forest & Bird	General comments	Highest erosion risk land (woody vegetation)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.026	China Forest Group Company New Zealand Ltd			General comments	Mechanical land preparation	Amend		Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).		Accept
S288.026	China Forest Group Company New Zealand Ltd	FS23.050	Forest & Bird	General comments	Mechanical land preparation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.027	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser	Amend		Notes registered members of the NZ Institute of Forestry are automatically also Registered Forestry Advisors.	Add sub-clause (d):and includes a Registered Member of the New Zealand Institute of Forestry.		Reject
S288.027	China Forest Group Company New Zealand Ltd	FS23.051	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.027	China Forest Group Company New Zealand Ltd	FS50.019	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Registered forestry adviser		Support	NZCF supports the relief sought.	Allow	Not stated	Reject
S288.028	China Forest Group Company New Zealand Ltd			General comments	Highest erosion risk land (plantation forestry)	Oppose		Considers the map process inappropriate for purpose and unjustified.	Delete. Consult properly and work with industry.		Accept
S288.028	China Forest Group Company New Zealand Ltd	FS23.052	Forest & Bird	General comments	Highest erosion risk land (plantation forestry)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought unless otherwise	Reject

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								with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		stated or where points are consistent with Forest & Bird's submission points and specific relief.	
S288.029	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Replanting	Amend		Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).		Accept
S288.029	China Forest Group Company New Zealand Ltd	FS23.053	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Replanting		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.031	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Amend		Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).		Accept
S288.031	China Forest Group Company New Zealand Ltd	FS23.055	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.037	China Forest Group Company New Zealand Ltd			6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend		Considers this reflects the recommendations of whaitua committees.	Amend to include: deliver a specific programme of engagement with forestry practitioners		Accept in part
S288.037	China Forest Group Company New Zealand Ltd	FS23.061	Forest & Bird	6 Other methods	Method M44: Supporting the health of rural waterbodies.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S288.056	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers the policy enables rules based on insufficient data, is not aligned with whaitua committee recommendations, and is not supported by Council's data. Concerned the rules are not practicable and imply write-off of larger areas and neither the efficacy of the existing regulatory framework under the NES-PF/CF, nor the gains of the proposal, have been adequately identified. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector.	Remove policy and reset to recognise substantive deficiencies.		Reject
S288.056	China Forest Group Company New Zealand Ltd	FS23.080	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S288.056	China Forest Group Company New Zealand Ltd	FS25.109	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support in part	Submission is consistent with GTC's own submission and the concern regarding Policy WH.P28	Allow in part	Remove policy and reset to address deficiencies as requested by submitter	Reject
S288.056	China Forest Group Company New Zealand Ltd	FS50.020	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	Allow	Not stated	Reject
S288.066	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Oppose		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. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.		Reject
S288.066	China Forest Group Company New Zealand Ltd	FS23.090	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.066	China Forest Group Company New Zealand Ltd	FS25.111	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.		Support	The submitter makes a good point being the need to separate vegetation clearance associated with commercial forestry that is already addressed by the NES-CF – this request is consistent with GTC's own submission seeking the provisions of the NES-CF to be relied on	Allow	Separate vegetation clearance associated with commercial forestry activities from general vegetation clearance and rely on NES-CF	Reject
S288.067	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		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. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.		Reject
S288.067	China Forest Group Company New Zealand Ltd	FS23.091	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.067	China Forest Group Company New Zealand Ltd	FS25.112	Guildford Timber Company Limited, Silverstream Forest Limited and the	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.		Support	The submitter makes a good point being the need to separate vegetation clearance associated with commercial forestry that is already addressed by the NES-CF – this request is consistent with GTC's own submission seeking the provisions of the NES-CF to be relied on	Allow	Separate vegetation clearance associated with commercial forestry activities from general vegetation clearance and rely on NES-CF	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Goodwin Estate Trust.								
S288.068	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Oppose		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. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.		Reject
S288.068	China Forest Group Company New Zealand Ltd	FS23.092	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.068	China Forest Group Company New Zealand Ltd	FS25.113	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.		Support	The submitter makes a good point being the need to separate vegetation clearance associated with commercial forestry that is already addressed by the NES-CF – this request is consistent with GTC's own submission seeking the provisions of the NES-CF to be relied on	Allow	Separate vegetation clearance associated with commercial forestry activities from general vegetation clearance and rely on NES-CF	Reject
S288.069	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Oppose		Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.		Reject
S288.069	China Forest Group Company New Zealand Ltd	FS23.093	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.069	China Forest Group Company New Zealand Ltd	FS25.114	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support in part	The request is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF	Allow in part	Delete rule and rely on provisions of NES-CF	Accept in part
S288.069	China Forest Group Company New Zealand Ltd	FS50.021	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S288.070	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Oppose		Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Notes there may be removal of alternate farm land use income opportunities for afforesting land to be taken out of farming. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.		Accept
S288.070	China Forest Group Company New Zealand Ltd	FS23.094	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.070	China Forest Group Company New Zealand Ltd	FS25.115	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support in part	The request is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF	Allow in part	Delete rule and rely on provisions of NES-CF	Accept in part
S288.070	China Forest Group Company New Zealand Ltd	FS50.022	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept
S288.071	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Oppose		Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.		Accept
S288.071	China Forest Group Company New Zealand Ltd	FS23.095	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.071	China Forest Group Company New Zealand Ltd	FS25.116	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	The request is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF	Allow	Delete rule and rely on provisions of NES-CF	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S288.071	China Forest Group Company New Zealand Ltd	FS50.023	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept
S288.099	China Forest Group Company New Zealand Ltd			General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers the policy enables rules based on insufficient data, is not aligned with whaitua committee recommendations, and is not supported by Council's data. Considers the rules are not practicable and imply write-off of larger areas. Concerned that neither the efficacy of the existing regulatory framework under the NES-PF/CF, nor the gains of the proposal, have been adequately identified. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector.	Remove policy and reset to recognise substantive deficiencies.		Reject
S288.099	China Forest Group Company New Zealand Ltd	FS23.123	Forest & Bird	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.099	China Forest Group Company New Zealand Ltd	FS50.024	New Zealand Carbon Farming Group ('NZCF')	General comments	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	Allow	Not stated	Reject
S288.110	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.	Oppose		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. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.		Reject
S288.110	China Forest Group Company New Zealand Ltd	FS23.134	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.111	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		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. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.		Reject
S288.111	China Forest Group Company New Zealand Ltd	FS23.135	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S288.112	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.	Oppose		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. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.		Reject
S288.112	China Forest Group Company New Zealand Ltd	FS23.136	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule P.R18: Vegetation clearance – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.113	China Forest Group Company New Zealand Ltd			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.		Reject
S288.113	China Forest Group Company New Zealand Ltd	FS23.137	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.113	China Forest Group Company New Zealand Ltd	FS50.025	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Reject
S288.114	China Forest Group Company New Zealand Ltd			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Oppose		Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Notes there may be removal of alternate farm landuse income opportunities for afforesting land to be taken out of farming. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.		Accept
S288.114	China Forest Group Company New Zealand Ltd	FS23.138	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S288.114	China Forest Group Company New Zealand Ltd	FS50.026	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept
S288.115	China Forest Group Company New Zealand Ltd			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Oppose		Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.		Accept
S288.115	China Forest Group Company New Zealand Ltd	FS23.139	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.115	China Forest Group Company New Zealand Ltd	FS50.027	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept
S288.121	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose		Not stated	Separate out non-plantation vegetation clearance associated with plantation forest activities. Remove requirement and align with NES-CF for non-plantation vegetation clearance.		Reject
S288.121	China Forest Group Company New Zealand Ltd	FS23.145	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.122	China Forest Group Company New Zealand Ltd			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose		Considers there is overlap with NES-CF, which creates confusion and adds little value.	Remove and align and incorporate to NES-CF		Accept in part
S288.122	China Forest Group Company New Zealand Ltd	FS23.146	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S288.122	China Forest Group Company New Zealand Ltd	FS50.028	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	NZCF supports the relief sought and agrees that alignment with the NESCF is appropriate.	Allow	Not stated	Accept in part
S3.001	Dougal Morrison			2 Interpretation	General comments - overall	Not Stated		Considers there is no justification for bringing in changes to control forestry use beyond the NES' for Commercial Forestry.	Not stated.		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S3.002	Dougal Morrison			2 Interpretation	General comments - current legislation	Not Stated		Considers any reference to NES' for Plantation Forestry should be removed and replaced with NES' for Commercial Forestry (NES-CF).	Not stated.		No recommendation
S3.002	Dougal Morrison	FS50.032	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Disallow	Not stated	No recommendation
S3.003	Dougal Morrison			2 Interpretation	General comments - current legislation	Not Stated		Considers the NES-CF should be allowed to bed in before significant changes are made to the NRP	Not stated.		No recommendation
S3.003	Dougal Morrison	FS50.033	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF supports the submission for the same reasons set out in NZCF's primary submission.	Allow	Not stated	No recommendation
S3.005	Dougal Morrison			General comments	General comments - water quality improvements	Not Stated		Considers GWRC has not provided scientific evidence that forests have caused significant degradation of freshwater quality in the Te Awarua-o-Porirua and Whanganui-a-tara catchments.	Not stated.		No recommendation
S3.005	Dougal Morrison	FS50.034	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - water quality improvements		Support	NZCF supports the submission and similar shares the view that Proposed Plan Change 1 does not include any evidence or data to support the conclusion that the environment is degraded as a result of the status quo.	Allow	Not stated	No recommendation
S3.007	Dougal Morrison			2 Interpretation	General comments - overall	Not Stated		Considers extra resources should be provided to a monitoring team, as per the Te Awarua-o-Porirua and Te Whanganui-a-tara Whaitua recommendations.	Not stated.		No recommendation
S3.008	Dougal Morrison			2 Interpretation	General comments - overall	Not Stated		Concerned the Section 32 analysis doesn't justify the changes to forestry management rules.	Not stated.		No recommendation
S3.008	Dougal Morrison	FS50.036	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF supports the submission and shares the view that the Section 32 Report does not include sufficient analysis of the necessity, efficiency or effectiveness of the forestry management rules.	Allow	Not stated	No recommendation
S3.009	Dougal Morrison			2 Interpretation	General comments - economic cost/impact	Not Stated		Considers the proposed changes will significantly impact forest investment in the Wellington Region and reduce the benefits from carbon sequestration.	Not stated.		No recommendation
S3.009	Dougal Morrison	FS50.037	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - economic cost/impact		Support	NZCF supports the submission and considers that the Section 32 Report does not quantify the costs of Proposed Plan Change 1, including in respect of employment and the New Zealand Emissions Trading Scheme.	Allow	Not stated	No recommendation
S3.010	Dougal Morrison			General comments	General comments - plantation forestry	Not Stated		Concerned this will result in unmanaged forests and associated problems.	Not stated.		No recommendation
S3.011	Dougal Morrison			2 Interpretation	General comments - overall	Not Stated		Considers rules need to be appropriate to the type of forest being managed. Considers commercial forests using a continuous forest cover approach should be a permitted activity.	Not stated.		No recommendation
S3.012	Dougal Morrison			2 Interpretation	General comments - overall	Not Stated		Considers GWRC has not provided scientific evidence that forests have caused any significant degradation of freshwater quality. States 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. Feels GWRC presents a biased view of the role of forestry in the Section 32 report Considers there is no evidence that more stringent NES-CF will not achieve GWRC's water quality objectives and there is no reason to bring in greater controls than those in the NES-CF.	Not stated.		No recommendation
S3.012	Dougal Morrison	FS50.038	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF generally supports the submission and considers that the Section 32 Report lacks the detail and evidence necessary to support the provisions of Proposed Plan Change 1 that relate to forestry.	Allow	Not stated	No recommendation
S3.013	Dougal Morrison			2 Interpretation	General comments - overall	Not Stated		References recommendations from Te Awarua-o-Porirua WIP and Te Whanganui-a-Tara WIPs and considers these recommendations have not been	Not stated.		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								followed and more complex and expensive regulations are now proposed.			
S3.013	Dougal Morrison	FS50.039	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support in part	NZCF supports the submission and seeks that the recommendations in the Te Awarua-o- Porirua WIP and Te Whanganui-a-Tara Implementation Programmes be accurately and appropriately reflected in Proposed Plan Change 1.	Allow in part	Not stated	No recommendation
S3.014	Dougal Morrison			2 Interpretation	General comments - current legislation	Not Stated		References Section 5 and Section 85 of the RMA. Concerned the proposed plan will make it impossible for forestry owners to provide for their economic well-being or to make reasonable use of their land. Concerned that forestry owners will not be able to generate income post-harvest but costs, such as rates or maintenance costs for fences will continue. Concerned that forests will not be able to be harvested due to the conditions in the rules. Considers it is unlikely that the maximum sediment level of 100 gr/m3 will be able to be met. Considers that additional costs for planning, documentation, experts and consent fees may make it impossible to economically harvest a forest.	Not stated.		No recommendation
S3.015	Dougal Morrison			General comments	General comments - plantation forestry	Amend		Concerned if highly erodible land is unable to be re-planted post-harvest, the land will revert to unmanaged forests. Concerned this will create problems of trees falling into streams or causing shading of streams.	Seeks that: Replanting be a permitted activity subject to the permitted activity conditions in the NESCF The recommendations from Te Awarua-o-Porirua WIP (Recommendations 54 and 55), and the recommendation from Te Whanganui-a-Tara WIP (Recommendation 37) be adopted by Greater Wellington. Greater resources are provided to monitor harvesting activities.		Accept in part
S3.016	Dougal Morrison			9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry – controlled activity.	Oppose		Concerned if highly erodible land is unable to be re-planted post-harvest it will result in unmanaged forests and associated problems.	Delete Rule P.R19.		Reject
S3.017	Dougal Morrison			9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry – discretionary activity.	Oppose		Concerned if highly erodible land is unable to be re-planted post-harvest it will result in unmanaged forests and associated problems.	Delete Rule P.R20.		Accept
S3.018	Dougal Morrison			9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Oppose		Concerned if highly erodible land is unable to be re-planted post-harvest it will result in unmanaged forests and associated problems.	Delete Rule P.R21.		Accept
S3.019	Dougal Morrison			2 Interpretation	General comments - overall	Not Stated		Supports the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Associations' submissions.	Not stated.		No recommendation
S32.009	Ian Stewart			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Oppose		Comments relating to steeper land are as follows: Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation	Delete Rule WH.R17 as it is covered by District Plan Rules.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								clearance rules. Considers it appropriate that these district plan rules prevail. Submits that the sedimentation risks from grazing of erosion risk land, in this catchment are, de minimis in comparison to plantation forestry, almost entirely from grazing on blocks of greater than 20ha and adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023.Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans.			
S32.010	Ian Stewart			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Oppose		Comments relating to steeper land are as follows: Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023.Outlines that smaller blocks identified as “74- Grassland with woody biomass” in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. Submits that the sedimentation risks from grazing of erosion risk land, in this catchment are, de minimis in comparison to plantation forestry, almost entirely from grazing on blocks of greater than 20ha and adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023.Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans. Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023.Outlines that smaller blocks identified as “74- Grassland with woody biomass” in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. submits that the sedimentation risks from grazing of erosion risk land, in this catchment are:1. De minimis in comparison to plantation forestry.2. Almost entirely from grazing on blocks of greater than 20ha.3. Adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023. Considers vegetation clearance rules are contradictory to the District Planning rules and that	Delete Rule WH.R18 as it is covered by District Plan Rules.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								vegetation rules are more appropriately addressed in district plans.			
S32.011	Ian Stewart			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Oppose		Comments relating to steeper land are as follows :Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023.Outlines that smaller blocks identified as “74- Grassland with woody biomass” in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. Submits that the sedimentation risks from grazing of erosion risk land, in this catchment are, de minimis in comparison to plantation forestry, almost entirely from grazing on blocks of greater than 20ha and adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023.Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans. Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023.Outlines that smaller blocks identified as “74- Grassland with woody biomass” in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. submits that the sedimentation risks from grazing of erosion risk land, in this catchment are:1. De minimis in comparison to plantation forestry.2. Almost entirely from grazing on blocks of greater than 20ha.3. Adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023. Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans.	Delete Rule WH.R19 as it is covered by District Plan Rules.		Reject
S36.001	Wellington Branch of New Zealand Farm Forestry Association			2 Interpretation	General comments - overall	Not Stated		Supports submission from the national body of NZFFA.	Not stated		No recommendation
S36.005	Wellington Branch of New			2 Interpretation	General comments - overall	Not Stated		Notes the proposed approach to prohibit production forestry from 10% of the steepest forestry land is	Not stated		No recommendation

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	Zealand Farm Forestry Association							based on catchment modelling, on the assumption that the steepest land delivers the most sediment to waterways via landslides. Concerned this approach is not based on objective evidence, does not consider other sources of sediment, and the approach is inconsistent with forestry best practice guidelines and scientific literature on forestry erosion.			
S36.005	Wellington Branch of New Zealand Farm Forestry Association	FS50.161	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF generally supports the submission for the reasons given and similarly considers that the provisions of Proposed Plan Change 1 should be supported by sound rationale and evidence.	Allow	Not stated	No recommendation
S36.006	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers the 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 water bodies.	Not stated		No recommendation
S36.007	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Oppose		Considers making all forestry operations a controlled activity is draconian and is not supported by evidence.	Not stated		No recommendation
S36.008	Wellington Branch of New Zealand Farm Forestry Association			2 Interpretation	General comments - current legislation	Not Stated		Notes a new version of the NES-CF is in force and has stronger environmental controls.	Not stated		No recommendation
S36.010	Wellington Branch of New Zealand Farm Forestry Association			2 Interpretation	General comments - current legislation	Not Stated		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, the submitter considers GW should exempt forestry under 20ha as a Controlled Activity.	Withdraw the prohibition on harvest. Should the above relief not be granted, exempt forestry under 20ha as a controlled activity.		Reject
S36.010	Wellington Branch of New Zealand Farm Forestry Association	FS25.001	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	2 Interpretation	General comments - current legislation		Support	Submission is consistent with GTC's own submission and recognises the NES-CF addresses the concerns relating to managing adverse effects of commercial forests (as outlined in by the submitter in S36.013)	Allow	The withdrawal of the prohibition on harvesting forests	Reject
S36.010	Wellington Branch of New Zealand Farm Forestry Association	FS50.162	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Reject
S36.011	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers 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 (red zoned land). Notes national consistency on this matter is desirable.	Not stated		No recommendation
S36.011	Wellington Branch of New Zealand Farm Forestry Association	FS50.163	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the concept of sourcing the data that supported the development of the NESCF in order to 'test' the appropriateness of Proposed Plan Change 1 as it relates to forestry activities.	Allow	Not stated	No recommendation
S36.012	Wellington Branch of New Zealand Farm Forestry Association			2 Interpretation	General comments - overall	Not Stated		Concerned PC1 lacks input from experienced soil conservators and questions why they were not consulted. Considers a tunnel-view solution is proposed for a problem that may not exist.	Rather than prohibit Plantation Forestry from the steepest slopes, explore other ways of mitigating the risk of erosion from steep slopes after harvesting.		Accept
S36.012	Wellington Branch of New Zealand Farm	FS25.003	Guildford Timber Company	2 Interpretation	General comments - overall		Support	Submission is correct in identifying the need for input from experienced soil conservators and seeks other ways of mitigating the risk of erosion from steep	Allow	Explore other ways of mitigating risk of erosion from steep	Accept

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	Forestry Association		Limited, Silverstream Forest Limited and the Goodwin Estate Trust.					slopes after harvesting rather than using the prohibited activity approach opposed by GTC in it's own submission		slopes after harvesting rather than prohibiting Plantation Forestry	
S36.012	Wellington Branch of New Zealand Farm Forestry Association	FS50.164	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF supports the relief sought and considers that a full range of alternatives should be considered as part of an appropriately detailed evaluation under section 32 of the RMA.	Allow	Not stated	Accept
S36.013	Wellington Branch of New Zealand Farm Forestry Association			2 Interpretation	General comments - current legislation	Not Stated		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. Considers 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.	Not stated		No recommendation
S36.013	Wellington Branch of New Zealand Farm Forestry Association	FS50.165	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - current legislation		Support	NZCF shares the view that the appropriateness and necessity of additional regulation, beyond the Regulations in the NESCF should be rigorously tests against sound evidence as part of an appropriately detailed evaluation under section 32 of the RMA.	Allow	Not stated	No recommendation
S36.014	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Concerned about aspirational targets becoming regulation in PC1 and questions whether this is fair and reasonable. Notes 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 avoided erosion, carbon services and other ecosystem services provided by plantation forestry are highly valued. Considers the requirement under the NPS-FM for plantation forestry to release no more sediment to water bodies than existed in the natural state is unrealistic. Notes erosion events will be more frequent and intense due to climate change. Concerned PC1 will set a precedent in NZ and the proposed peak sediment discharges of only 100g/m3 , high compliance costs, certification of plans, auditing, and the inability of current forestry best practise and technology to deliver desired outcomes, the regulations could put plantation forestry in hill country out of business. Concerned 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.	Not stated		No recommendation
S36.015	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Oppose		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.	Not stated		No recommendation
S36.016	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers 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. Notes the region has few landslides in forested areas, even after harvesting. Notes 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	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								managed forests. Considers 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.			
S36.017	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Notes there are no studies that measure the amount of sediment from forestry operations in the Whaitua Te Whanganui-Tara or Te Awarua-o-Porirua Whaitua. Modelling that has occurred is based on broad assumptions. Considers 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, which are subject to orange and red zoning under the NES-CF. Notes no such land classes are present in the Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua. Notes GW have not sought professional forestry or soil conservator advice. Considers some policies are based on models of erosion risk rather than real data. Considers 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.	Not stated		No recommendation
S36.017	Wellington Branch of New Zealand Farm Forestry Association	FS50.166	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF generally supports the submission for the reasons given and similarly considers that the provisions of Proposed Plan Change 1 should be supported by sound rationale and evidence.	Allow	Not stated	No recommendation
S36.019	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Notes a report commissioned by Whaitua Te Whanganui-a-Tara which indicates that deposited fine sediment levels was low in some rivers with extensive plantation forestry, and that fine sediment was not significantly impacting ecosystem health. Suggests relatively high levels of fine sediment downstream in the Hutt River are a result of bulldozer activity from flood protection works, rather than from upstream farming, urban earthworks or forestry activity. Notes current GW data for the Hutt Valley sub-catchments with high levels of plantation forest do not indicate elevated levels of deposit fine sediment.	Not stated		No recommendation
S36.021	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Notes NZ literature which indicates Wellington has relatively stable hill country soils which are desirable for forestry operators. Considers the risk of landslide for Wellington, Porirua, and Hutt Valley soils is lower than for unreinforced bare soil.	Not stated		No recommendation
S36.022	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Notes bare land in a harvested pine forest, whilst not having a canopy to intercept rainfall, does not behave like unprotected bare soil. Notes there is no specific data differentiating various sources of sediment in Wellington water bodies. Considers 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. Considers urban and pastoral land cover classes are worse than predominantly plantation forestry catchments and native catchments.	Not stated		No recommendation
S36.023	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		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. Suggests that slips on steep land under periodic forestry cover are not a major source of suspended sediment. Notes another study that risk of shallow slips on non-wooded greywacke steep slopes is less than for other soil types. Suggests GW obtain data on shallow	GW commission or obtain live data about shallow landslide incidence after harvest from their own extensive forests to see if retiring out steepest slopes from forestry could actually make a significant difference to sediment in water bodies.		Accept in part

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								landslide incidence after harvest from their own forests to determine if retiring steepest slopes from forestry impacts sediment in water bodies.			
S36.024	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		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. Notes pastoral, intensive farming, horticulture and arable/market gardening do not seem to be held to the same expectation. 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 other natural dynamics over the last 1000 or more years. Considers 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. Notes 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 can be a major portion of sediment and turbidity near the sources of these seepages. Notes water quality is only routinely monitored at a few readily accessible sites low down in the catchment. Questions what 'natural state' means in relation to managing forestry sediment loss. Is it a waterway in the foothills surrounded by climax bush (undisturbed by ungulates), a water body flowing from a recently regenerating seral forest as covers much of the Wellington hill country and heavily browsed by pest ungulates (goats, deer, pigs), or is it only defined at the few official monitoring points low down in a catchment area? Questions 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. Questions whether TAS are realistic and if they take into account dynamics of natural systems including increased erosion caused by climate change or earthquakes.	Not stated		No recommendation
S36.025	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		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. Considers it more equitable to time-average discharge limits for forestry over a 25-35 year period. Considers insufficient understanding is demonstrated in PC1 of sediment loss to waterways within a cyclic forestry environment. Considers the peak point source sediment limits of 100g/m3 is unrealistic. Considers it better to define forestry best practice and audit to those standards.	Not stated		No recommendation
S36.025	Wellington Branch of New Zealand Farm Forestry Association	FS50.168	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given.	Allow	Not stated	No recommendation
S36.026	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Notes data is needed to determine where sediment is coming from. However, considers forestry earthworks, including roading and associated batters, culverts, stream crossings, use of skidders, for plantation forestry near Upper Hutt are much more frequent and significant sources of sediment than shallow land	Not stated		No recommendation

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								slide and surficial erosion from steep slopes after tree harvest. States this view is supported by the Hawkes Bay Pakuratahi Paired catchment report, (Eyles). Notes Natural State sediment contributions can be significant. 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). Suggests Greater Wellington produce evidence from their own forests (rather than rely on dubious modelling).			
S36.026	Wellington Branch of New Zealand Farm Forestry Association	FS50.169	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given and considers that commercial forestry activities are appropriately managed by the NESCF regulations.	Allow	Not stated	No recommendation
S36.027	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers that if plantation forestry were prohibited from “highest risk erosion prone” slopes, that after harvesting, regeneration of pine, gorse and other weeds would be likely, and that regeneration of native vegetation is unlikely. Notes the potential for large scale wilding pines. Notes tree toppling on managed sites 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.	Not stated		No recommendation
S36.028	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		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. Considers there is potential to improve carbon sequestration by encouraging managed exotic forestry species. Suggests rather than banning production forestry from steepest slopes, consider alternative timber species, permanent forestry, carbon forestry continuous cover forestry / close to nature forestry to reduce risk of sediment loss.	Not stated		No recommendation
S36.028	Wellington Branch of New Zealand Farm Forestry Association	FS50.170	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given.	Allow	Not stated	No recommendation
S36.029	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers there will be unintended consequences from prohibiting plantation forestry from steep slopes as it will alter the forestry management plans as production forests may then be restricted to broad ridge lines and lower slopes/valley floors. Sediment discharges from forestry roading and tracks may also get worse. Notes if cable logging cannot be undertaken, there may be an increased use of ground-based log transport which uses heavy machines on soft temporary tracks rather than on engineered and metalled roads creating more soil disturbance and soil compaction than that caused by cable logging. Considers more stream crossing and seepage crossing, and faster and heavier runoff flows from the upper slopes will also impact earthworks and	Not stated		No recommendation

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								in the narrow valleys there is often limited space available to install structures to manage sediment near waterways. Concerned larger areas of land than mapped will become uneconomic to grow and harvest trees from, individual parcels will not 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. Notes 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. Concerned the 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 toppling in storms. 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. Questions who will be accountable for this problem. Cites former GW soil conservator assertion that radiata pine needs active management and is not a suitable species for unmanaged stands.			
S36.030	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers there are many alternative solutions to mitigate the risk of sediment loss from steep slopes and the production forestry ban will undermine research into improved technologies for harvesting and silviculture on steep slopes. Cites the following examples of alternatives:- Panpac's method of re-grassing or sowing a cover crop immediately after harvest which greatly reduces surficial runoff and would enable use of selective herbicides to reduce woody regrowth (pines/gorse etc) later and prior to replanting in crop trees. - immediate replanting of crop trees in some situations- replanting at higher than usual planting density- lower final stocking rates- impose restrictions on tracking/earthworks on steepest slopes (and/or additional safeguards to prevent sediment moving offsite.- use of coppicing timber crop species such as poplars, acacia, oak, redwoods and eucalypts.- extend rotation length- alternative harvesting strategies e.g. small coup, strip harvest, selection harvesting.- close to nature (Pro Silva) or Continuous Cover Canopy regimes. Suggests the definition of highest risk erodible forest land can be adjusted by increasing the slope angle to above 30 degrees and taking into account underlying lithology. Considers the criteria used should be technically peer reviewed by industry recognised experts and aligned to observed field data. Prefers the provisions of the NES-CF prevail.	Amend the definition of 'highest risk erodible forest land' by increasing the slope angle to above 30 degrees and taking into account underlying lithology. That the criteria used are technically peer reviewed by industry recognised experts and aligned to observed field data.		Reject
S36.030	Wellington Branch of New Zealand Farm Forestry Association	FS50.171	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	Allow	Not stated	Reject
S36.031	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Notes the NES-CF already requires forests have a full cycle plan, including erosion and sediment control plan, available on request, whereas GW are requiring an erosion control plan certified at an early stage, and for the whole forestry cycle to be controlled and	That forests under 20ha be subject only to NES-CF rules (permitted activities) and be exempt from GW controlled activity consenting, noting GW can still be notified of harvesting or soil		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								consented. Considers the requirement to prepare and consent an erosion plan 30 years ahead of soil disturbance is unreasonable and the NES-CF rules are sufficient. Notes the cost to prepare and certify an erosion plan will not be affordable at a small scale and many years ahead of forestry income, as well as additional burden of preparing a freshwater plan for livestock operations. 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. Notes NES-freshwater part 2 provisions only apply to pastoral or arable land operations larger than 20 ha.	disturbance near water bodies as allowed for in the NES-CF.		
S36.032	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers the s32 report cost/benefit assessment lacks logic and underestimates financial impacts. Considers the greater than 10% of land taken out of production forestry will have long-term impact, undermine confidence in plantation forestry, and will reduce the benefits of plantation forestry. Notes the desire for equitable processes to achieve the TAS and 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. Questions the equitability of the TAS, noting 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.	Not stated		No recommendation
S36.032	Wellington Branch of New Zealand Farm Forestry Association	FS50.172	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given and similarly considers that the section 32 evaluation does not demonstrate the appropriateness or necessity for the forestry related provisions in Proposed Plan Change 1.	Allow	Not stated	No recommendation
S36.033	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers the majority of published evidence shows plantation forestry is much better than pastoral farming in highly erodible zones in relation to soil disturbance and sediment runoff. Notes some sensitive harbours and estuaries are silting up but we don't know the relative contributions from Wellington area forestry vs natural or other land activities. Considers the case put forward by GW 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. Notes the NES-CF has been revised with tighter controls and has only just been implemented. Concerned there are serious errors in the assigned TAS values. Considers the gravity of the situation does not warrant overriding the NES-CF and it is unknown whether the original NES-PF had any effect. Notes available data suggests deposited fine sediment in some forestry catchments has improved since 2013-2015. Concerned the rules are being tightened instead of undertaking enforcement.	Not stated		No recommendation
S36.033	Wellington Branch of New Zealand Farm Forestry Association	FS50.173	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission for the reasons given and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	No recommendation
S36.034	Wellington Branch of New Zealand Farm Forestry Association			General comments	General comments - plantation forestry	Not Stated		Considers the concern that increasing forestry operations will worsen sediment does not account for a number of factors, including: earthworks are often one-off and done at the end of the forest cycle; improvements in harvesting technology; reductions in	Not stated		No recommendation

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								manual tree falling; the potential for airship assisted harvesting; and improved tools to identify and manage sensitive areas. Suggests sensitive erosion prone areas should be identified and micromanaged.			
S36.040	Wellington Branch of New Zealand Farm Forestry Association			8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose		Considers policy is misguided, noting Wellington, Hutt Valley and Porirua hills are greywacke, with low risk of shallow landslide. Considers no evidence is provided which suggests steepest slopes are a significant source of sediment after forest harvest. Considers earthworks before and during harvest are a more likely source of sediment. Considers withdrawing plantation forestry from steepest slopes could have unintended consequences and increase risk of sediment loss. Notes alternative ways to mitigate risk of sediment loss from steep land.	Delete policy		Accept in part
S36.040	Wellington Branch of New Zealand Farm Forestry Association	FS50.174	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given. NZCF considers that there are methods available to manage adverse effects and that this should be reflected in the Policy.	Allow	Not stated	Accept in part
S36.042	Wellington Branch of New Zealand Farm Forestry Association			8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance – discretionary activity.	Amend		Considers references to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 should instead refer to NES Commercial Forestry or NES Plantation Forestry.	Replace references to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 with references to NES Commercial Forestry or NES Plantation Forestry.		Accept
S36.043	Wellington Branch of New Zealand Farm Forestry Association			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Amend		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 erosion and sediment control plan, 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. 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 GW officials will determine area, location and methods used. Concerned the clause may prohibit forestry from otherwise suitable land and create health and safety concerns. Concerned GW officials may override appropriate contractor operations.	Clause (a): Delete 'high erosion risk pasture' Amend clause (b) to exclude forests less than 20ha and not in red zoned land. Delete clause (c) and use best practise guidelines to control sediment. Delete clause (d). Amend matter of control (1): Do not increase average sediment load between forest lifecycles. Delete matter of control (2).		Accept in part
S36.043	Wellington Branch of New Zealand Farm Forestry Association	FS50.175	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Allow	Not stated	Accept in part
S36.044	Wellington Branch of New Zealand Farm			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Amend		Considers references to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 should instead refer to NES Commercial Forestry or NES Plantation Forestry.	Replace references to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 with references to NES		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Forestry Association								Commercial Forestry or NES Plantation Forestry.		
S36.045	Wellington Branch of New Zealand Farm Forestry Association			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Amend		Considers the clause is too far reaching and is misguided. Concerned the clause 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”. Prefers the NES-CF prevails. Suggests a number of other methods to mitigate the risk of sediment loss to water bodies in original submission. Considers 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.	That the NES-CF provisions prevail. Failing that: - remove the word "afforestation" until more research data is available. - Change the clause title to not indicate that plantation forestry is prohibited. - Review policy and engage with forest industry and forest experts. - Land areas with contiguous 'pixels' need to be larger than 1000m2 for the regulations to apply.		Accept in part
S36.045	Wellington Branch of New Zealand Farm Forestry Association	FS50.176	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. NZCF considers there is no justification for such a stringent rule to prevail over the NESCF.	Allow	Not stated	Accept in part
S36.048	Wellington Branch of New Zealand Farm Forestry Association			8 Whaitua Te Whanganui-a-Tara	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose		Considers objective clause Bb unrealistic, noting the NPS-FW defines natural state as about 1000 years ago.	Delete clause Bb		Accept
S36.049	Wellington Branch of New Zealand Farm Forestry Association			2 Interpretation	B Management objectives	Support		Considers the objectives unrealistic, noting the natural state is not measurable at a forest or small catchment level. Notes Increased intensity of storm events and feral animals contribute to sediment loss, as well as landslides. Notes forestry harvests typically have a 30-year cycle, with major earthworks being a one-off event. Considers it unreasonable to treat peak sediment loadings as if they occur at the same rate every year. 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. Notes studies which suggest that a full forestry cycle on highly erodible land releases less sediment than pastoral farming. Considers arbitrary limits and unrealistic standards for compliance threatens hill country forestry. Welcomes input from GW on design of sediment control structures that are practical and affordable and that can be assessed alongside existing Best Practise Guidelines.	Delete Objectives B2 and B3. If the above relief is not implemented: - raise peak discharge standard to 1000g/m3 - amend so forestry sediment discharge is time averaged over the life cycle of the forest.		Accept
S36.050	Wellington Branch of New Zealand Farm Forestry Association			2 Interpretation	C1 Contents of the Erosion and Sediment Management Plan	Oppose		Considers larger forestry operators with professional advisors may be able to comply with the requirements, but not smaller operators, especially if highest risk or erosion prone land does not exist in their forest. Considers no justification is provided that the NES-CF will not deliver satisfactory outcomes. References the alternative methods set out elsewhere in submission to mitigate sediment loss from steepest slopes within forestry. Notes potential amendments to address alternative species, alternatives harvest techniques, and variations on permanent forest where partial harvesting is allowed.	Withdraw Schedule 34. Failing that: Amend clause 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		Accept

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									wind up within 30 years; or -where forest operations are less than 20ha.		
S44.001	Sue Hawkins			General comments	Highest erosion risk land (plantation forestry)	Oppose		Farms should be assessed on a singular basis due to diverse contours in the Makara/Ohariu region. Already controlled by RMA regulations and forestry rules. Lack of evidence to support assumption that steep slopes are a significant source of sediment.	REVIEW the general conditions relating to Forestry on risk land.		No recommendation
S47.001	Richard Swan			2 Interpretation	General comments - overall	Not Stated		Supports full submissions from National New Zealand Farm Forestry Associated and Wellington branch New Zealand Farm Forestry Association.	Not stated		No recommendation
S47.002	Richard Swan			2 Interpretation	General comments - economic cost/impact	Not Stated		Concerned the economic impacts of proposed rules and requirements in PC1 would render forest operation uneconomic.	Not stated		No recommendation
S47.003	Richard Swan			2 Interpretation	General comments - overall	Not Stated		Considers proposed rules governing forestry in PC1 would render land incapable of reasonable use. Challenges these rules in accordance with s85 RMA.	Not stated		No recommendation
S48.001	Alan Bell & Associates			2 Interpretation	General comments - overall	Not Stated		Supports the Wellington Branch of the New Zealand Farm Forestry Associations submission.	Recommend that GWRC take notice of the information presented in the NZFFAW submission.		No recommendation
S48.002	Alan Bell & Associates			General comments	General comments - plantation forestry	Not Stated		Concerned 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 and loss of significant areas of productive land. Considers that GWRC should make sure the forest owners do a good job of their roading on all types of land. States the owner gets to utilise their investment in land and infrastructure and water quality due to there being ongoing interest in the land.	Not stated		No recommendation
S48.003	Alan Bell & Associates			8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Amend		Considers the proposed Plantation Forestry Erosion and Sediment Management Plan, will have detrimental effects on forestry operations and produce negligible water quality improvements. Concerned land used for forestry will be rendered unusable due to highest erosion risk land (HERL) mapping as presented in Map 95. Concerned about the lack of compensation and financial assistance for losses of workable land, broader economic impacts, and permanent woody species required to restore and revegetate HERL. Concerned discontinuing forestry rotations may lead to a decline in investment for roads resulting in poor quality roads and environmental outcomes. Concerned requirements to revegetate HERL do not align with ETS obligations which may result in fees around NZU sequestration. 'Questions what in a 'natural state' is and at what point the land was in a 'natural' state. Concerned not all Registered Forestry Advisers will have the expertise to develop plantation Forestry Erosion and Sediment Management Plans that effectively minimises sediment loss.	Not stated		No recommendation
S48.003	Alan Bell & Associates	FS50.001	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.		Support	NZCF generally supports views expressed in the submission for the reasons given, along with the reasons set out in NZCF's primary submission in respect of Schedule 34.	Allow	Not stated	No recommendation
S49.001	Hamish Levak			2 Interpretation	General comments - overall	Not Stated		Supports the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Associations' submissions.	Not stated		No recommendation
S49.002	Hamish Levak			2 Interpretation	General comments - overall	Not Stated		Concern that proposed rules governing forestry in Plan Change 1 would render their forestry interests incapable of reasonable use, and challenges the rule under Section 85 of the RMA.	Not stated		No recommendation
S49.003	Hamish Levak			2 Interpretation	General comments - economic cost/impact	Not Stated		Concern the costs and restrictions under the proposed new requirements will make small forestry operations uneconomic.	Not stated		No recommendation

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S52.001	Jeremy Collins			2 Interpretation	General comments - overall	Not Stated		Supports submissions from National New Zealand Farm Forestry Association and Wellington branch of the New Zealand Farm Forestry Association	Not stated		No recommendation
S52.002	Jeremy Collins			2 Interpretation	General comments - economic cost/impact	Oppose		Believes costs and restrictions of PC1 would make their forestry operation uneconomic and limit future income	Not stated		No recommendation
S52.003	Jeremy Collins			2 Interpretation	General comments - overall	Oppose		Concerned rules governing forestry in PC1 would render interest in land incapable of reasonable use	Not stated		No recommendation
S54.001	Peter Kiernan			2 Interpretation	General comments - overall	Not Stated		Supports the New Zealand Farm Forestry Association Inc, and the New Zealand Farm Forestry Association's Wellington branch submissions	Not stated		No recommendation
S54.002	Peter Kiernan			2 Interpretation	General comments - economic cost/impact	Oppose		Concerned the decisions of the proposed plan change could be rolled out on the Kapiti Coast -where the submitter resides. Concerned the extra costs associated with consultant and resource consent fees will make forestry uneconomical. Believes that rules governing forestry in PC1 would render interest in land incapable of reasonable use citing section 85 of the RMA.	Ensure that if national standards are followed forestry harvesting be a Permitted Activity under the plan		Accept in part
S54.002	Peter Kiernan	FS50.118	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - economic cost/impact		Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	Allow	Not stated	Accept in part
S54.003	Peter Kiernan			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Not Stated		Considers that without local scientific data that changes to the forestry rules are not justified.	Not Stated		No recommendation
S54.003	Peter Kiernan	FS50.119	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission and agrees that the section 32 evaluation fails to provide sufficient evidence and rationale to confirm that the Rule is necessary and appropriate.	Allow	Not stated	No recommendation
S54.004	Peter Kiernan			8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.	Not Stated		Considers that without local scientific data that changes to the forestry rules are not justified.	Not Stated		No recommendation
S54.004	Peter Kiernan	FS50.120	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry – discretionary activity.		Support	NZCF supports the submission and agrees that the section 32 evaluation fails to provide sufficient evidence and rationale to confirm that the Rule is necessary and appropriate.	Allow	Not stated	No recommendation
S54.005	Peter Kiernan			8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Not Stated		Considers that without local scientific data that changes to the forestry rules are not justified.	Not Stated		No recommendation
S54.005	Peter Kiernan	FS50.121	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.		Support	NZCF supports the submission and agrees that the section 32 evaluation fails to provide sufficient evidence and rationale to confirm that the Rule is necessary and appropriate.	Allow	Not stated	No recommendation
S54.006	Peter Kiernan			General comments	General comments - plantation forestry	Oppose		Considers that without local scientific data that changes to the forestry rules are not justified.	Not stated		No recommendation
S54.006	Peter Kiernan	FS50.122	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission and agrees that the section 32 evaluation fails to provide sufficient evidence and rationale to confirm that the Rule is necessary and appropriate.	Allow	Not stated	No recommendation
S55.001	Annette Cairns			2 Interpretation	General comments - overall	Not Stated		Supports the submissions of the New Zealand Farm Forestry Association Inc, and the New Zealand Farm Forestry Association's Wellington branch.	Not Stated		No recommendation
S55.002	Annette Cairns			2 Interpretation	General comments - overall	Oppose		Concerns rules governing forestry in PC1 would render interest in land incapable of reasonable use citing section 85 of the RMA	Not Stated		No recommendation
S55.002	Annette Cairns	FS50.002	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - overall		Support	NZCF generally supports views expressed in the submission for the reasons given, along with the reasons set out in NZCF's primary submission.	Allow	Not stated	No recommendation

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S55.004	Annette Cairns			2 Interpretation	General comments - economic cost/impact	Oppose		Believes costs and restrictions of PC1 would make forestry business uneconomic and limit future income	Not Stated		No recommendation
S55.004	Annette Cairns	FS50.004	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - economic cost/impact		Support	NZCF generally supports the submission and considers that the Section 32 Report does not adequately quantify or address the economic or social costs of Proposed Plan Change 1, including in respect of the New Zealand Emissions Trading Scheme.	Allow	Not stated	No recommendation
S58.001	David and Carolyn Gratton			2 Interpretation	General comments - overall	Not Stated		Supports the submissions made by the New Zealand Farm Forestry Association and the Wellington Branch of the New Zealand Farm Forestry Association.	Not stated		No recommendation
S58.003	David and Carolyn Gratton			2 Interpretation	General comments - economic cost/impact	Amend		Concerned about timing and costs of preparing erosion plans. Wants to see MPI erosion susceptibility tool used. Considers the mapping used in PC1 is not suitable for determining erosion prone land.	Retain the NES-CF and exempt forestry blocks of less than 100ha from the PC1 controlled activity requirements.		Accept in part
S58.003	David and Carolyn Gratton	FS50.029	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	General comments - economic cost/impact		Support	NZCF supports the submission and similarly considers that the mapping of erosion risk land is not appropriate. Further, NZCF supports the view that the NESCF regulations should apply.	Allow	Not stated	Accept in part
S58.004	David and Carolyn Gratton			General comments	General comments - plantation forestry	Amend		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 additional requirement to provide an erosion and sediment control plan early in the soil disturbance process is unrealistic and unreasonable.	Retain the NES-CF and exempt forestry blocks of less than 100ha from the PC1 controlled activity requirements.		Accept in part
S58.004	David and Carolyn Gratton	FS50.030	New Zealand Carbon Farming Group ('NZCF')	General comments	General comments - plantation forestry		Support	NZCF supports the submission because the submission suggests that it would be appropriate for the NESCF to "bed in" before determining whether more stringent provisions are necessary.	Allow	Not stated	Accept in part
S9.023	Louise Askin			8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Amend		Seeks implementation of WIP recommendation 36.Considers farm-scale assessments of highest risk land be used rather than current whaitua-wide mapping.	Note "high erosion risk land as identified in individual erosion risk management plans".		Accept in part
S9.024	Louise Askin			8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Seeks implementation of WIP recommendation 36.Considers farm-scale assessments of highest risk land be used rather than current whaitua-wide mapping.	Note "highest erosion risk land as identified in individual erosion risk management plans".		Accept in part
S9.025	Louise Askin			8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.	Amend		Considers it is unclear whether mapping is fit for purpose and suggests comparing against best practice mapping tools. Considers forestry is an effective soil conservation tool on erosion prone land, dependent on the severity of erosion risk and forestry type. Suggests prioritising productive/protective options for erosion prone land where suitable. Notes in Mākara/Ohariu, pine is one of the only tree species that will grow in wind exposed areas (other than low native scrub).	Review whether mapping is fit for purpose.		Accept in part
S9.025	Louise Askin	FS50.089	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry – controlled activity.		Support	NZCF supports the submission for the reasons given and for the reasons in NZCF's primary submission.	Allow	Not stated	Accept in part
S94.010	Jo McCready			9 Te Awarua-o-Porirua Whaitua	9.3.4 Land uses	Amend		Considers there are different pest plants within the region. Considers some pest plants threaten establishing native vegetation whilst others nurse revegetation.	Add definition of pest plants.		Accept
S94.011	Jo McCready			8 Whaitua Te Whanganui-a-Tara	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Amend		Considers conditions are arbitrary with no factual basis.	Amend conditions to allow for an individual property scale response.		Accept in part