

Form 6

Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To Greater Wellington Regional Council ("GWRC")

Name of person making further submission: New Zealand Carbon Farming Group ("NZCF")

This is a further submission in support of, and in opposition to, a number of submissions on the Proposed Plan Change 1 to the operative Natural Resources Plan for the Wellington Region ("NRP"), being partly a freshwater planning instrument ("Proposed Plan Change 1").

NZCF has an interest in Proposed Plan Change 1 that is greater than the interest the general public has, because NZCF:

- has an interest as a landowner and/or occupier in respect of existing and possibly future permanent carbon forests that are potentially affected (directly or indirectly) by the relevant submissions; and
- made a submission on Proposed Plan Change 1.

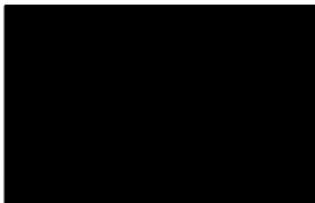
NZCF's further submission

NZCF's support of, or opposition to, a particular submission including the reason for NZCF's support or opposition and the relief sought are detailed in the table attached as Appendix A.

NZCF seeks that the submissions it supports be allowed or disallowed respectively for the reasons given (or such further alternative relief or amendments as may be necessary to achieve the outcome sought).

NZCF wishes to be heard in support of its further submissions.

If others make a similar submission or further submission, NZCF will consider presenting a joint case with them at a hearing.



Signature of person authorised to sign
on behalf of New Zealand Carbon Farming Group

Date: 15 March 2024

Organisation:	Consultant	Submitter
Electronic address for service:	Ainsley McLeod Consulting Limited ainsley@amconsulting.co.nz	New Zealand Carbon Farming Group tayla.westman@nzcarbonfarming.co.nz
Telephone:		
Postal address:	8 Aikmans Road, Merivale, Christchurch 8014	PO Box 37713, Parnell, Auckland 1151
Contact person:	Ainsley McLeod, Director/Planner	Tayla Westman, Corporate Counsel

Appendix A – New Zealand Carbon Farming Group: Further Submission on Submissions Made on Proposed Plan Change 1 to the Operative Natural Resources Plan for the Wellington Region

The following table sets out the decisions sought by NZCF in respect of submissions made on the Proposed Plan Change 1, including the reasons for NZCF’s support or opposition in respect of the original submission. The Proposed Plan Change 1 text is shown without underlining; the relief sought in primary submission is shown as black underlined and ~~striketrough~~.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
Alan Bell and Associated (submission number S048)				
S48.003	<p>Schedule 34: Plantation Forestry Erosion and Sediment Management Plan</p> <p>Considers the proposed Plantation Forestry Erosion and Sediment Management Plan, will have detrimental effects on forestry operations and produce negligible water quality improvements.</p> <p>Concerned land used for forestry will be rendered unusable due to highest erosion risk land (HERL) mapping as presented in Map 95.</p> <p>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.</p> <p>Concerned requirements to revegetate HERL do not align with ETS obligations which may result in fees around NZU sequestration.</p> <p>'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.</p>	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 the submission.
Annette Cairns (submission number S055)				
S055.002	<p>General</p> <p>Concerns rules governing forestry in PC1 would render interest in land incapable of reasonable use citing section 85 of the RMA</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S055.003	General – Maps Questions the validity of the mapping techniques used to determine erosion prone land.	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out. 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 (“NESCF”).	Allow the submission and replace Maps 92 and 95 with the erosion susceptibility classification in the NESCF.
S055.004	General Believes costs and restrictions of PC1 would make forestry business uneconomic and limit future income	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 the submission.
Ara Poutama Aotearoa the Department of Corrections (submission number S248)				
S248.004	General – Maps 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 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	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 the submission and replace Maps 92 and 95 with the erosion susceptibility classification in the NESPF.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S248.025	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH:P28: Achieving reductions in sediment discharges from plantation forestry</p> <p>Questions feasibility of point (c) of this policy with regard to disparate areas of high erosion risk plantation forestry land identified in Map 92.</p> <p>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.</p> <p>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.</p> <p>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.</p>	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 WH:P28.	Allow the submission.
S248.028	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P31: Winter shut down of earthworks</p> <p>Considers a policy requiring all earthworks over 3,000m² to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of prison infrastructure.</p> <p>Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months</p>	Support	NZCF supports the submission and similarly considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	subject to careful management and considers pathway should continue to be available to applicants through consent process.			
S248.040	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22 Plantation forestry on highest erosion risk land – prohibited activity</p> <p>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.</p> <p>Considers if rule only applies to new forests as per the definition of "afforestation" in the NES-CF, submitter considers this rule is reasonable.</p> <p>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.</p>	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 that part of the submission seeking clarification of the scope of the Rule.
S248.049	<p>Chapter 9 Te Awarua-o-Porirua Whaitua</p> <p>Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Questions feasibility of point (c) of this policy with regard to disparate areas of high erosion risk plantation forestry land identified in Map 92.</p> <p>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</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>pine still provides benefits for stabilising erosion-prone land and considers this policy could be counterproductive.</p> <p>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.</p> <p>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.</p>			
248.052	<p>Chapter 9 Te Awarua-o-Porirua Whaitua Policy P.P29: Winter shut down of earthworks.</p> <p>Oppose Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of prison infrastructure.</p> <p>Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process</p>	Support	NZCF supports the submission and similarly considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow the submission.
248.063	<p>Chapter 9 Te Awarua-o-Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land -prohibited activity.</p> <p>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.</p>	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 that part of the submission seeking clarification of the scope of the Rule.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers if rule only applies to new forests as per the definition of "afforestation" in the NES-CF, submitter considers this rule is reasonable.</p> <p>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.</p>			
China Forest Group Company New Zealand Ltd (submission number S288)				
S288.001	<p>General comments</p> <p>General comments – overall</p> <p>Considers several aspects of PC1 are poorly founded and require considerable research and explanation.</p> <p>Notes the following points of concern:</p> <ul style="list-style-type: none"> - 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. <p>Remove the sections of PC1 related to forestry. Align rules to those of the NES-CF.</p> <p>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.</p>	Support	<p>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.</p>	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S288.003	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p>	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 the submission.
S288.012	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	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 or urgency for the whitua committees to recommend significant and stringent changes to the regulatory framework surrounding forestry.			
S288.013	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p> <p>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.</p>	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 the submission.
S288.014	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers the erosion susceptibility layers are based on information that excludes geological considerations and has not been peer reviewed.</p> <p>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</p>	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	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>well as areas not being retired that may suffer landsliding in severe weather events.</p> <p>Considers the methodology for "Highest Erosion Risk- Plantation" has led to 'paxilation', which is impractical for forestry activities as rules could enable forestry in one patch and disallow it in an adjacent patch.</p> <p>Notes several factors which determine harvesting feasibility, resulting in more land needing to be retired than suggested in GWRC data.</p> <p>Estimates that in the estate GFG manages, anything from an average of 9% up to 18% might be retired due to PC1 rules.</p> <p>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.</p>		given to the whitua committee recommendations.	
S288.015	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p>	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 the submission.
S288.019	<p>General comments</p> <p>General comments - current legislation</p> <p>Concerned the section 32 report does not adequately demonstrate the need for the stringency proposed in PC1.</p> <p>Submitter references parts of the section 32 analysis which they disagree with.</p> <p>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.</p> <p>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 additional measures which involves option 1 plus a "exposed area" regulation.</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S288.027	Chapter 2 Interpretation Registered forestry adviser 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.	Support	NZCF supports the relief sought.	Allow the submission.
S288.056	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry. 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.	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	Allow the submission.
S288.069	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R20: Plantation forestry - controlled activity 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.	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 the submission.
S288.070	Chapter 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	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whitua committees.</p> <p>Remove rule and align requirement with NES-CF 2023.</p>		effectiveness of the NESCF has been appropriately evaluated.	
S288.071	<p>Chapter 8 Whitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Considers the rules subvert the intent of the NES- PF/CF and are not supported by GWRC data.</p> <p>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 whitua committees.</p> <p>Remove rule and align requirement with NES-CF 2023.</p>	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 the submission.
S288.099	<p>Chapter 9 Te Awarua-o- Porirua Whitua</p> <p>Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Considers the policy enables rules based on insufficient data, is not aligned with whitua 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</p>	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	acted in bad faith in relation to pre-consultation and engagement with the forestry sector. Remove policy and reset to recognise substantive deficiencies.			
S288.113	Chapter 9 Te Awarua-o- Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity. 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.	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 the submission.
S288.114	Chapter 9 Te Awarua-o- Porirua Whaitua Rule P.R20: Plantation forestry - discretionary activity. 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.	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 the submission.
S288.115	Chapter 9 Te Awarua-o- Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity. Considers the rules subvert the intent of the NES- PF/CF and are not supported by GWRC data.	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	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.			
S288.122	Chapter 12 Schedules Schedule 34:Plantation Forestry Erosion and Sediment Management Plan Considers there is overlap with NES-CF, which creates confusion and adds little value. Remove and align and incorporate to NES-CF	Support	NZCF supports the relief sought and agrees that alignment with the NESCF is appropriate.	Allow the submission.
David and Carolyn Gratton (Submission number S058)				
S58.003	General 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	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 the submission.
S58.004	General – plantation forestry 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 t	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 the submission.
Donald Love (submission number S102)				
S102.002	Chapter 9 Te Awarua-o-Porirua Whaitua 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 the submission in respect of taking a risk-based approach to production forestry.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	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			
Dougal Morrison (submission number S003)				
S3.002	General Considers any reference to NES' for Plantation Forestry should be removed and replaced with NES' for Commercial Forestry (NES-CF).	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 the submission.
S3.003	General Considers the NES-CF should be allowed to bed in before significant changes are made to the NRP.	Support	NZCF supports the submission for the same reasons set out in NZCF's primary submission.	Allow the submission.
S3.005	General 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.	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 the submission.
S3.006	General Considers the proposed erosion classification is unhelpful. Concerned the classification does not express the absolute risk, but rather the risk relative to all other agricultural land. Considers it better to use the ESC classification in the NES-CF.	Support	NZCF supports the submission for the reasons given in NZCF's primary submission.	Allow the submission.
S3.008	General Concerned the Section 32 analysis doesn't justify the changes to forestry management rules.	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S3.009	General Considers the proposed changes will significantly impact forest investment in the Wellington Region and reduce the benefits from carbon sequestration.	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 the submission.
S3.012	General 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.	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 the submission.
S3.013	General References recommendations from Te Awarua-o-Porirua WIP and Te Whanganui-a-Tara WIPs and considers these recommendations have not been followed and more complex and expensive regulations are now proposed.	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 the submission.
Environmental Defence Society Inc (submission number S222)				
S222.001	Chapter 2 Interpretation 'Afforestation' Refer to updated regulations - NES-CF.	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 the submission.
S222.002	Chapter 2 Interpretation 'Earthworks'	Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Refer to updated regulations - NES-CF.		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.	
S222.003	Chapter 2 Interpretation 'Harvesting' Refer to updated regulations - NES-CF.	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 the submission.
S222.004	Chapter 2 Interpretation 'Mechanical land preparation' Refer to updated regulations - NES-CF.	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 the submission.
S222.006	Chapter 2 Interpretation 'Replanting' Refer to updated regulations - NES-CF.	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 the submission.
S222.007	Chapter 2 Interpretation 'Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)' Refer to updated regulations - NES-CF.	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	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			effectiveness of the NESCF has been appropriately evaluated.	
S222.048	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH:P28: Achieving reductions in sediment discharges from plantation forestry To give effect to NPSFM. Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting.	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 the submission.
S222.060	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R20: Plantation forestry -controlled activity. To give effect to NPSFM and comply with RMA. Make a discretionary or restricted discretionary 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 the submission.
S222.061	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry – discretionary activity To give effect to NPSFM and comply with RMA. Amend as consequence of changes to Rule WH.20	Oppose	NZCF opposes the submission because the relief sought is unclear and on the 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 the submission.
S222.091	Chapter 9 Te Awarua-o-Porirua Whaitua Policy P.P26: Achieving reductions in sediment discharges from plantation forestry. To give effect to NPSFM. Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting	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 the submission.
S222.102	Chapter 9 Te Awarua-o-Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity. To give effect to NPSFM and comply with RMA. Make a discretionary or restricted discretionary 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 the submission.
S222.103	Chapter 9 Te Awarua-o-Porirua Whaitua	Oppose	NZCF opposes the submission because the relief sought is unclear and on the on the	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Rule P.R20: Plantation forestry – discretionary activity To give effect to NPSFM and comply with RMA. Amend as consequence of changes to Rule WH.20		basis that no rationale or analysis is provided in terms of how an amendment is appropriate or necessary to give effect to the NPSFM.	
Forest & Bird (submission number S261)				
S261.089	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry 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.	Oppose	NZCF opposes the submission on the basis that the submission does not include evidence or justification for the relief sought.	Disallow the submission.
S261.113	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R20: Plantation forestry - controlled activity. 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.	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 the submission.
S261.115	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity. Supports consistency with the purpose of the RMA. Retain as notified	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S261.168	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Considers further direction is required to ensure effects are minimised.</p> <p>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).</p> <p>Retain (c).</p> <p>Any further consequential or alternative relief as may be necessary and appropriate to address concerns.</p>	Oppose	NZCF opposes the submission on the basis that the submission does not include evidence or justification for the relief sought.	Disallow the submission.
S261.190	<p>Chapter 9 Te Awarua o-Porirua Whaitua</p> <p>Rule P.R19: Plantation forestry - controlled activity.</p> <p>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.</p> <p>Reclassify as a discretionary activity.</p> <p>Any further consequential or alternative relief as may be necessary and appropriate to address concerns.</p>	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 the submission.
Forest Enterprises (submission number S111)				
S111.002	<p>General comments</p> <p>General comments – overall</p> <p>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).</p> <p>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.</p>	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 the submission.
S111.003	<p>General comments</p> <p>General comments - current legislation</p>	Support	NZCF supports the submission for the reasons given and considers that Proposed Plan Change 1 should be withdrawn until	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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.</p> <p>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.</p>		such time as the effectiveness of the NESCF has been appropriately evaluated.	
S111.005	<p>General comments</p> <p>General comments – plantation forestry</p> <p>Considers GWRC have ignored statements made by Easton, Nation and Blyth.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Considers a site-specific assessment, which has same purpose as the required Harvest and Earthworks plans (schedule 4 & 6) of NESCF,</p>	Support	NZCF supports the submission for the reasons given and for the reasons set out in NZCF's primary submission.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>provides more appropriate mitigation measures than the generalised PC1.</p> <p>Considers it unjustified to propose rules that impact land-disturbing activities if they were ignored.</p> <p>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.</p>			
S111.006	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p>	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 the submission.
S111.008	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers no recommendations from the Waitua committees or the forestry industry have been implemented which reflect the proposed rules for plantation forestry.</p> <p>Notes as acknowledged in the Waitua 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.</p>	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 the submission.
S111.009	<p>General comments</p> <p>General comments – overall</p> <p>Considers environmental outcomes Te-Awarua-o- Porirua and Te-Whanganui-a-Tara have recommended are not reflected by the proposed NRP rules.</p> <p>Considers oversimplifying slope and not factoring forestry activities, yet proposing rules on this basis, is scientifically and logically inconsistent.</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers whitua recommendations consistent with the National Environmental Standards of Commercial Forestry and provides the site-specific assessments needed.</p> <p>Submitter invite GWRC to consult with forestry industry and evaluate level of stringency that NESCF already provides.</p>			
Greater Wellington Regional Council (submission number S238)				
S238.015	<p>Chapter 8 Whitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry – controlled activity.</p> <p>Notes replanting is an element of commercial forestry that is intended to be included in these rules.</p> <p>Amend as follows:</p> <p>“Afforestation, harvesting, <u>replanting</u>, earthworks, or mechanical land preparation for plantation-commercial forestry,…”</p>	Support	Subject to the relief sought in NZCF’s primary submission, NZCF supports the inclusion of ‘replanting’ in the Rule.	Allow the submission.
S238.016	<p>Chapter 8 Whitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p> <p>Notes replanting is an element of commercial forestry that is intended to be included in these rules</p> <p>Amend as follows:</p> <p>“Afforestation, harvesting, <u>replanting</u>, earthworks, or mechanical land preparation for plantation-commercial forestry,…”</p>	Support	Subject to the relief sought in NZCF’s primary submission, NZCF supports the inclusion of ‘replanting’ in the Rule.	Allow the submission.
S238.017	<p>Chapter 8 Whitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Notes replanting is an element of commercial forestry that is intended to be included in these rules</p> <p>Amend as follows:</p> <p>“Afforestation, harvesting, <u>replanting</u>, earthworks, or mechanical land preparation for plantation-commercial forestry,…”</p>	Support	Subject to the relief sought in NZCF’s primary submission, NZCF supports the inclusion of ‘replanting’ in the Rule.	Allow the submission.
S238.027	<p>Chapter 9 Te Awarua- o-Porirua Whitua</p> <p>Rule P.R19:</p> <p>Plantation forestry - controlled activity.</p>	Support	Subject to the relief sought in NZCF’s primary submission, NZCF supports the inclusion of ‘replanting’ in the Rule.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Notes replanting is an element of commercial forestry that is intended to be included in these rules Amend as follows: "Afforestation, harvesting, <u>replanting</u> , earthworks, or mechanical land preparation for plantation <u>commercial</u> forestry,..."			
S238.028	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R20: Plantation forestry - discretionary activity. Notes replanting is an element of commercial forestry that is intended to be included in these rules Amend as follows: "Afforestation, harvesting, <u>replanting</u> , earthworks, or mechanical land preparation for plantation <u>commercial</u> forestry,..."	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	Allow the submission.
S238.029	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity. Notes replanting is an element of commercial forestry that is intended to be included in these rules Amend as follows: "Afforestation, harvesting, <u>replanting</u> , earthworks, or mechanical land preparation for plantation <u>commercial</u> forestry,..."	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	Allow the submission.
Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust (submission number S210)				
S210.003	General comments General comments - plantation forestry 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	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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 costs and benefits of this change in land use and property rights of land owners who undertake a forestry business on the land. There appears to have been no consultation with the Region's forestry industry in development of these provisions despite the significant impact it will have on the industry, the submitter's own operator was not consulted as well as many of its contracting crews.</p> <p>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.</p> <p>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</p>			

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>amendment regulations, and for consistency PC1 should reflect these changes.</p> <p>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).</p> <p>Seeks the following:</p> <p>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;</p> <p>Correctly refer to the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (Updated 3 November 2023);</p> <p>Correctly refer to 'commercial forestry' to be consistent with the updated NES-CF;</p> <p>Correct the Note after Rule WH.R19 on page 98 to refer to the NES-CF.</p>			
S210.007	<p>Chapter 2 Interpretation</p> <p>Highest erosion risk land (plantation forestry)</p> <p>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: green (low) and yellow (moderate) - land less likely to erode where commercial forestry activities are permitted (subject to conditions being met);</p> <p>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.</p> <p>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</p>	Support in part	<p>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.</p>	<p>Subject to the relief sought in NZCF's primary submission, allow the submission.</p>

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>Seeks the following:</p> <p>The management of commercial forestry activities on the submitters land be undertaken in accordance with the erosion susceptibility classification tool and the requirements of the NES-CF;</p> <p>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;</p> <p>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.</p>			
S210.034	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.</p> <p>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</p>	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	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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 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.</p> <p>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; Deletion of Clause (c).</p>		time as the effectiveness of the NESCF has been appropriately evaluated.	
S210.048	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity.</p> <p>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 addressing these matters as this adds a further layer of unnecessary bureaucracy and seek the rule to be deleted in its entirety.</p> <p>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</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>to freshwater and is relevant to Forestry NPS and NPS-IB should properly be part of the schedule 1 process.</p> <p>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.</p>			
S210.049	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Delete Rule WH.R21; or as an alternative and if it is retained;</p> <p>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.</p>	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 the submission.
S210.050	Chapter 8 Whaitua Te Whanganui-a-Tara	Support	NZCF supports the submission for the reasons given in the submission and in	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>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 of doing so, without a return which will impose a significant burden on submitters. Seek the deletion of Rule WH.R22 in its entirety.</p> <p>Delete WH.R22</p>		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.	
S210.054	<p>Chapter 12 Schedules</p> <p>Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.</p> <p>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.</p> <p>Particularly opposes the requirements of Management Objective 4 which is implemented through Clause (c) of WH.P28.</p> <p>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.</p>	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 the submission.
John Turkington Limited (submission number S237)				
S237.002	<p>General comments</p> <p>General comments - current legislation</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Concerned lack of evidence and justification for forestry restrictions and how NES-CF controls are insufficient for managing forestry and associated effects.		effectiveness of the NESCF has been appropriately evaluated.	
S237.003	General comments General comments - current legislation Considers PC1 duplicated existing controls under NES-CF including use of erosion mapping and management plan requirements.	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 the submission.
S237.004	General comments General comments - economic cost/impact Concerns with lack of evidence provided by GW on environmental effects from forestry.	Support	NZCF supports the submission and similarly considers that the provisions relating to forestry must be supported by evidence.	Allow the submission.
S237.005	General comments General comments - current legislation 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.	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 the submission.
S237.008	General comments General comments – overall Notes importance that polices, 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	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>do not consider management practices beyond erosion risk, and are already adequately controlled for within NES-CF.</p> <p>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."</p>			
S237.009	<p>General comments</p> <p>General comments - water quality improvements</p> <p>Seeks rules must be consistent with existing operating framework of NES-CF.</p> <p>Notes the sediment discharge provisions of the NES-CF form an important component of the permitted activity standards for forestry earthworks under the current regulatory regime, and apply irrespective of the identified erosion susceptibility of the land.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	Support	<p>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.</p>	<p>Allow the submission.</p>

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	and Harvest Management Plans within NES-CF is insufficient for managing forestry activities. Seeks rules must be consistent with existing operating framework of NES-CF.			
S237.010	<p>General comments</p> <p>General comments - current legislation</p> <p>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.</p> <p>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.</p> <p>Suggests proposed or amended policies, objectives or rules of PC1 as they relate to commercial forestry are not necessary or appropriately justified in accordance with the statutory provisions of Section 32(4) of RMA that apply to this type of plan change.</p>	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 the submission.
S237.011	<p>General comments</p> <p>General comments - current legislation</p> <p>Considers NES-CF sufficient for managing forestry activities and notes Council have not provided any evidence contrary to this.</p> <p>Seeks Council should provide evidence that NES- CF is insufficient to meet the objectives for water quality, ecosystem health and mana</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>whenua values in these FMUs before looking to pursue this plan change process further.</p> <p>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.</p> <p>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.</p> <p>Alternatively, Seeks Council should utilise stringency ability under NES-CF to develop more stringent rules for specific controls.</p>			
Juken New Zealand (submission number S191)				
S191.001	<p>General comments</p> <p>General comments- overall</p> <p>Concerns about:</p> <p>The extension of controls beyond the recommendations of the Waitua committee WIP reports.</p> <p>No consideration for ETS implications with the removal of land from production.</p> <p>Inadequate Section 32 analysis</p> <p>Deficient application of NES-CF Regulation 6 for enforcing more stringent rules.</p> <p>Impracticalities of the erosion mapping and definition of high erosion.</p>	Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	Allow the submission.
S191.003	<p>General comments</p> <p>General comments - current legislation</p> <p>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.</p> <p>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</p>	Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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).</p> <p>Considers the Section 32 report: Part A - Background and Context (para 88) does not provide any evidence that the enforcing of more stringent rules will deliver better outcomes than the NES-CF. Notes that neither of the two Waitua committees recommended that the NES - PF was insufficient to meet fresh water targets.</p>			
S191.004	<p>General comments</p> <p>General comments – plantation forestry</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Concerns that the pixelated quality of maps 92 and 95 will result in more land then necessary written off.</p>	Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	Allow the submission.
Kāinga Ora (submission number S257)				
S257.074	<p>Chapter 13 Maps</p> <p>Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.</p>	Support	NZCF supports the submission to the extent that the submission identifies that the Map is not readily understood at a site level	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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.</p> <p>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.</p> <p>Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.</p>			
S257.077	<p>Chapter 13 Maps</p> <p>Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.</p>	Support	NZCF supports the submission to the extent that the submission identifies that the Map is not readily understood at a site level	Allow the submission.
Louise Askin (submission number S009)				
S9.025	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity.</p> <p>Considers it is unclear whether mapping is fit for purpose and suggests comparing against best practice mapping tools. Considers forestry is an</p>	Support	NZCF supports the submission for the reasons given and for the reasons in NZCF's primary submission.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>effective soil conservation tool on erosion prone land, dependent on the severity of erosion risk and forestry type.</p> <p>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).</p> <p>Review whether mapping is fit for purpose.</p>			
New Zealand Farm Forestry Association (NZFFA) (submission number S195)				
S195.001	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p> <p>Concerned PC1 will cause a significant decline in commercial forest activity in the Wellington region which, in turn, will impact the regional economy, make it harder to meet climate change targets, and may lead to negative environmental effects.</p>	Support	NZCF supports the submission and similarly acknowledges that Council monitoring does not support the approach taken in the Proposed Plan Change.	Allow the submission.
S195.008	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p> <p>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.</p> <p>Considers without such evidence, there is no reason to undercut a national environmental standard.</p>	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 the submission.
S195.010	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers GWRC have not provided forestry specific evidence related to the Wellington region that demonstrates the NES-PF (and now the NES-</p>	Support	NZCF supports the submission and similarly considers that there is no evidence to justify the rules, particularly with the NESCF is	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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.</p> <p>Suggests that what is proposed does not comply with regulation 6.1 in the NES-CF.</p>		intended to address the effects of commercial forestry.	
S195.018	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Contend that the environmental benefits of the three options are equal.</p>	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 the submission.
S195.022	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Considers there are more effective ways of improving water quality than those proposed under PC1.			
S195.025	<p>General comments</p> <p>General comments – maps</p> <p>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.</p> <p>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.</p>	Support	NZCF supports the submission and has similar concerns about the accuracy and usability of the maps.	Allow the submission.
S195.029	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry – controlled activity.</p> <p>Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.</p> <p>Delete rules in PC1 that are more stringent than the NES- CF</p>	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 the submission.
S195.030	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p> <p>Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.</p> <p>Delete rules in PC1 that are more stringent than the NES- CF</p>	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 the submission.
S195.031	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.</p> <p>Delete rules in PC1 that are more stringent than the NES- CF</p>	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 the submission.
S195.032	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R19:</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Plantation forestry - controlled activity. 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		withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S195.033	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R20: Plantation forestry - discretionary activity. 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	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 the submission.
S195.034	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity. 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	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 the submission.
S195.035	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives. Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Support	NZCF supports the submission and particularly notes that the Policy fails to consider the role the NESPF (and NESCF) play in appropriately managing activities (as a higher order planning instrument).	Allow the submission or revise to reflect the role of the NESCF.
S195.036	Chapter 9 Te Awarua- o-Porirua Whaitua Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives. Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Support	NZCF supports the submission and particularly notes that the Policy fails to consider the role the NESPF (and NESCF) play in appropriately managing activities (as a higher order planning instrument).	Allow the submission or revise to reflect the role of the NESCF.
S195.040	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity. 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.	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the rules create an anomaly as pasture areas with a high erosion risk must be retired to woody vegetation regardless of water clarity.</p> <p>However, if water clarity is poor, rules may prevent planting trees in non-erosion-prone forest land within the same catchment.</p> <p>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.</p> <p>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.</p>			
S195.041	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity</p> <p>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.</p> <p>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.</p> <p>Questions why the information requested is required.</p> <p>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</p>	Support	<p>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.</p>	<p>Allow the submission.</p>

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>As the RMA requires policies and rules to be effects based, it is considered these rules do not appear to comply.</p> <p>Remove afforestation from P.R.19 and WH.R20</p> <p>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.</p>			
S195.042	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity."</p> <p>Considers these rules impractical for the following reasons:</p> <p>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.</p> <p>Considers the rules create an anomaly as pasture areas with a high erosion risk must be retired to woody vegetation regardless of water clarity.</p> <p>However, if water clarity is poor, rules may prevent planting trees in non-erosion-prone forest land within the same catchment.</p> <p>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.</p> <p>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.</p>	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 the submission.
S195.045	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R20: Plantation forestry - discretionary activity</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>		<p>that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.</p>	

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements.</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22</p>			
S195.046	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R19: Plantation forestry - controlled activity</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22.</p>			
S195.047	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.</p> <p>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.</p> <p>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.</p> <p>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</p>	Support	<p>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.</p>	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>conditions and will likely not carry the risk associated with such a certification.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22</p>			
S195.048	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity</p> <p>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.</p> <p>Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m³. Notes, during moderate</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22</p>			

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S195.049	<p>Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity."</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all</p>	Support	<p>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.</p>	<p>Allow the submission.</p>

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>his legal obligations. Concerned there is no provision in the rules for appealing such a situation.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22.</p>			
S195.050	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>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.</p> <p>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.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements.</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22.</p>			
S195.051	<p>Chapter 12 Schedules</p> <p>Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.</p> <p>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.</p> <p>Considers the identification and classification of 'highest erosion risk' land relied on in Objective B (4) is unsuitable.</p> <p>Remove objectives B (2) and B (4) from Schedule 34.</p>	Support	In addition to the relief sought in NZCF's primary submission, NZCF generally agrees with the submission for the reasons given.	Allow the submission.
S280 Peter Handford (submission number S280)				
S280.001	<p>General comments</p> <p>Considers focus of PC1 should be achieving environmental outcomes, not prescriptive blanket removal of land uses from particular areas.</p>	Support	NZCF supports the submission and considers that the effects of activities should be managed, rather than the activities prevented.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S280.002	General comments General comments - plantation forestry Considers forestry management can be applied where this a strong focus on environmental outcomes such as soil and water protection and biodiversity	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 the submission.
S280.003	General comments General comments - plantation forestry Concerns PC1 creates blanket exclusion for forestry rather than set out measurable outcomes across all land uses with identified monitoring approaches	Support	NZCF supports the submission and considers that the effects of activities should be managed, rather than the activities prevented.	Allow the submission.
S280.004	General comments General comments - plantation forestry 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.	Support	NZCF supports the submission and considers that the effects of activities should be managed, rather than the activities prevented.	Allow the submission.
Peter Kiernan (submission number S054)				
S54.002	General comments General comments - economic cost/impact 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.	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S54.003	Chapter 8 Whaitua Te Whangan ui-a-Tara Rule WH.R20: Plantation forestry - controlled activity. Considers that without local scientific data that changes to the forestry rules are not justified.	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 the submission.
S54.004	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity. Considers that without local scientific data that changes to the forestry rules are not justified.	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 the submission.
S54.005	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity. Considers that without local scientific data that changes to the forestry rules are not justified.	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 the submission.
S54.006	General comments General comments –plantation forestry Considers that without local scientific data that changes to the forestry rules are not justified.	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 the submission.
PF Olsen Ltd (submission number S018)				
S18.002	Chapter 2 Interpretation Earthworks Concerned with having different definitions for earthworks and seeks consistency within legislation. Seeks clarification on if earthworks rules apply for forestry earthworks outside of Rules WR.20, WR.21, WH.R22, P.R19, P.R20 and P.R21. Amend the definition of Earthworks to provide consistency. Exclude forestry earthworks from earthworks rules.	Support	NZCF supports the submission to the extent that NZCF considers that the definition should be clear in its meaning and application including in respect of the rules that apply to commercial forestry.	Allow the submission.
S18.004	Chapter 2 Interpretation Highest erosion risk land (plantation forestry) Considers that there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	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 the submission, subject to the relief sought in NZCF's primary submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Delete the mapping layer or have it peer reviewed to establish its scientific validity.			
S18.028	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.</p> <p>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. 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.</p> <p>Delete policy.</p>	Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission.	Allow the submission.
S18.034	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity</p> <p>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.</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>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.</p> <p>Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.</p> <p>Amend to recognise permitted activity status from the NES- CF.</p>			
S18.035	<p>Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity."</p> <p>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.</p> <p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>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.</p> <p>Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.</p>	Support	<p>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</p>	<p>Allow the submission.</p>

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Amend activity status to controlled, with criteria that can be met by landowners.			
S18.036	<p>Chapter 8 Whaitua Te Whangan ui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>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.</p> <p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>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.</p> <p>Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.</p> <p>Delete the provision.</p>	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 the submission.
S18.054	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.</p> <p>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</p>	Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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. 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.</p> <p>Delete the policy</p>			
S18.061	<p>Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity</p> <p>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.</p> <p>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.</p> <p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>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.</p> <p>Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>managed forests.</p> <p>Amend to recognise permitted activity status from the NES- CF.</p>			
S18.062	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R20: Plantation forestry - discretionary activity."</p> <p>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.</p> <p>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.</p> <p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>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</p> <p>Amend activity status to restricted discretionary, with criteria that can be met by landowners.</p>	Support	<p>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</p>	<p>Allow the submission.</p>
S18.063	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.</p> <p>Concerned 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</p>	Support	<p>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</p>	<p>Allow the submission.</p>

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	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			
S18.071	Chapter 12 Schedules Schedule 34: Plantation Forestry Erosion and Sediment Management Plan. 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.	Support	NZCF supports the submission and considers that commercial forestry is best managed by the NESCF as a higher order planning instrument.	Allow the submission.
S18.077	Chapter 13 Maps Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara. 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.	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 the submission.
Southern North Island Wood Council (submission number S262)				
S262.002	General Comments General comments - overall Considers that PC1 is inconsistent with the whitua committee recommendations and is too onerous.	Support	NZCF supports the submission and agrees that Proposed Plan Change 1 is inconsistent with the whitua committee recommendations. NZCF considers that greater weight should be given to these recommendations in Proposed Plan Change 1.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S262.003	General comments General comments - plantation forestry Considers there has been no consideration for ETS implication with the removal of land from production.	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 the submission.
S262.004	General comments General comments – maps Considers there are impracticalities of the current erosion mapping class system. Considers the resolution too low and does not reflect forest scale erosion risk.	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 the submission.
S262.010	General comments General comments -plantation forestry 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.	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 the submission.
S262.011	General comments General comments - plantation forestry 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.	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S262.012	<p>General comments</p> <p>General comments-plantation forestry</p> <p>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.</p> <p>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".</p>	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 the submission.
S262.015	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20:</p> <p>Plantation forestry - controlled activity.</p> <p>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> <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>	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 the submission.
S262.016	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p>	Support	NZCF supports the submission for the reasons included in the submission and in	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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> <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>		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.	
S262.017	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity</p> <p>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> <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>	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 the submission.
S262.020	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R19: Plantation forestry - controlled activity</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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> <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>		that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S262.021	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R20: Plantation forestry - discretionary activity.</p> <p>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> <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>	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 the submission.
S262.022	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.</p>	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	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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> <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>		<p>withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.</p>	
S225 Upper Hutt City Council (submission number S225)				
S225.090	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>"Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry. Considers policy appears to conflict with requirements of NES-CF. Delete policy.</p>	Support	<p>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.</p>	Allow the submission.
S225.105	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry – controlled activity Considers this does not appear to align with requirements of NESCF. Delete rule.</p>	Support	<p>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.</p>	Allow the submission.
S225.106	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity. Considers this does not appear to align with requirements of NESCF. Delete rule.</p>	Support	<p>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</p>	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			effectiveness of the NESCF has been appropriately evaluated.	
Wairarapa Federated Farmers (submission number S193)				
S193.012	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p> <p>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).</p> <p>Considers the conversion of exotic forest to permanent forest presents several difficulties about the ETS as outlined below:</p> <p>Uncertainty around how the ETS treats the transition of registered exotic forests to native forest species,</p> <p>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</p> <p>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)</p> <p>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.</p> <p>Request this policy be amended to enable the replanting of production forests so long as landowners can identify (through a consent application) how the management and harvest of the forest will be achieved without adverse effects on sediment in water bodies.</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	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.			
S193.088	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry 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.	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 the submission.
S193.097	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R20: Plantation forestry - controlled activity Retain operative NRP rule Delete R20 Make any consequential amendment(s) necessary to give effect to the relief sought.	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 the submission to the extent that the Rule is deleted.
S193.098	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity. Retain operative NRP rule Delete R21 Make any consequential amendment(s) necessary to give effect to the relief sought.	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	Allow the submission to the extent that the Rule is deleted.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S193.099	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity. Retain operative NRP rule Delete R22 Make any consequential amendment(s) necessary to give effect to the relief sought.	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 the submission to the extent that the Rule is deleted.
S193.137	Chapter 9 Te Awarua- o-Porirua Whaitua Policy P.P26: Achieving reductions in sediment discharges from plantation forestry. 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.	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 the submission.
S193.146	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R19: Plantation forestry – controlled activity Retain operative NRP rule Delete Make any consequential amendment(s) necessary to give effect to the relief sought.	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 the submission to the extent that the Rule is deleted.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S193.147	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R20: Plantation forestry - discretionary activity." Retain operative NRP rule. Delete Make any consequential amendment(s) necessary to give effect to the relief sought.	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 the submission to the extent that the Rule is deleted.
S193.148	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land prohibited activity. Retain operative NRP rule Delete Make any consequential amendment(s) necessary to give effect to the relief sought.	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 the submission to the extent that the Rule is deleted.
S193.197	Chapter 13 Maps Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua. Considers the methodology is not fit for purpose Delete Make any consequential amendment(s) necessary to give effect to the relief sought.	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 the submission.
S193.200	Chapter 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	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the methodology is not fit for purpose</p> <p>Delete</p> <p>Make any consequential amendment(s) necessary to give effect to the relief sought.</p>		<p>responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.</p>	
Wellington Branch of New Zealand Farm Forestry Association (submission number S036)				
S36.005	<p>General comments</p> <p>General comments- overall</p> <p>Notes the proposed approach to prohibit production forestry from 10% of the steepest forestry land is based on catchment modelling, on the assumption that the steepest land delivers the most sediment to waterways via landslides. 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.</p>	Support	<p>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.</p>	Allow the submission.
S36.010	<p>General comments</p> <p>General comments - current legislation</p> <p>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.</p> <p>Withdraw the prohibition on harvest.</p> <p>Should the above relief not be granted, exempt forestry under 20ha as a controlled activity.</p>	Support	<p>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.</p>	Allow the submission.
S36.011	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers GWRC should ask for ESC data used by NESCF 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.</p>	Support	<p>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.</p>	Allow the submission.
S36.012	<p>General comments</p> <p>General comments – overall</p>	Support	<p>NZCF supports the relief sought and considers that a full range of alternatives</p>	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>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.</p> <p>Rather than prohibit Plantation Forestry from the steepest slopes, explore other ways of mitigating the risk of erosion from steep slopes after harvesting.</p>		should be considered as part of an appropriately detailed evaluation under section 32 of the RMA.	
S36.013	<p>General comments</p> <p>General comments - current legislation</p> <p>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.</p>	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 the submission.
S36.017	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p> <p>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.</p>	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 the submission.
S36.020	<p>General comments</p> <p>General comments – maps</p>	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Concerned the maps (based on mapping by Easton) identifying the highest risk erodible land for pastoral, woody vegetation and plantation forestry land are based on an assumption that bare land after clear-felling will have a risk of erosion similar to pasture and there is a significant window of vulnerability after harvest. Considers this risk is overstated as roots and minor debris armour the slope for a period and there are ways of mitigation erosion risk after harvest. Notes forestry land is only in a more vulnerable state (after harvest) about 10% of the time and should be regarded as if it was permanent woody vegetation, not pasture or bare soil.</p> <p>Considers the mapped erosion risk is relative rather than absolute, and does not account for underlying geology/lithology, roadworks, soil disturbance and forestry related activities as a potential source of sediment. Notes the mapping uses a 5m resolution, which is higher than the NES-CF and much of the highest risk erosion prone areas identified by Easton are so large that, had they qualified as Red Zone, the NES-CF/ESC resolution would have picked them up.</p> <p>Notes the C factor identified for the maps, and disagrees that pasture is only twice as susceptible to erosion as woody vegetation and that otherwise undisturbed bare earth (with or without roots) should not be 10 times worse than pasture. Considers the Risk of Erosion model is not nearly as sophisticated as that used to calculate Erosion Susceptibility Classes (ESC) for the NES-CF.</p> <p>References earlier mapping (2012) that considered the risk of pastureland slipping into water bodies. References Stats NZ Highly Erodible Land maps. Notes several researchers who state that shallow landslides often do not reach waterbodies and most of the material is retained on site as talus, particularly on sites with woody vegetation.</p> <p>Considers the mapping contracted to Easton et al did not consider the risk of sediment actually getting into waterbodies.</p> <p>Concerned the identified land parcels do not take into account the underlying lithology and Land Use Class Categories as is done for Erosion Susceptibility Classification used by NES-CF, which is intended to reflect an absolute risk of erosion.</p>		<p>responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.</p>	

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the approach used by Easton et al, and data produced should be subjected to expert technical review.</p> <p>Commission a technical review of the mapping by Easton et al.</p>			
S36.025	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p> <p>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).</p>	Support	NZCF supports the submission for the reasons given.	Allow the submission.
S36.026	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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 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.</p> <p>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.</p>	Support	NZCF supports the submission for the reasons given and considers that commercial forestry activities are appropriately managed by the NESCF regulations.	Allow the submission.
S36.028	<p>General comments</p> <p>General comments plantation forestry</p>	Support	NZCF supports the submission for the reasons given.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	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.			
S36.030	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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:</p> <ul style="list-style-type: none"> - 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. <p>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</p>	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>technically peer reviewed by industry recognised experts and aligned to observed field data. Prefers the provisions of the NES-CF prevail.</p> <p>Amend the definition of 'highest risk erodible forest land' by increasing the slope angle to above 30 degrees and taking into account underlying lithology.</p> <p>That the criteria used are technically peer reviewed by industry recognised experts and aligned to observed field data.</p>			
S36.032	<p>General comments</p> <p>General comments - plantation forestry</p> <p>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.</p>	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 the submission.
S36.033	<p>General comments</p> <p>General comments plantation forestry</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Notes the NES-CF has been revised with tighter controls and has only just been implemented.</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	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.			
S36.040	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.</p> <p>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.</p> <p>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.</p>	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 the submission.
S36.043	<p>Chapter 8 Whaitua Te Whangan ui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	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 the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>brown water input. Considers it unreasonable to penalise based on visual clarity test results outside of a forestry operator's control.</p> <p>Considers it unclear the effect of escalating plantation forestry to a discretionary activity.</p> <p>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.</p> <p>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.</p> <p>Clause (a): Delete 'high erosion risk pasture'</p> <p>Amend clause (b) to exclude forests less than 20ha and not in red zoned land.</p> <p>Delete clause (c) and use best practise guidelines to control sediment.</p> <p>Delete clause (d).</p> <p>Amend matter of control (1):</p> <p>Do not increase average sediment load between forest lifecycles.</p> <p>Delete matter of control (2).</p>			
S36.045	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22:</p> <p>Plantation forestry on highest erosion risk land - prohibited activity</p> <p>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.</p>	Support	<p>Subject to the relief sought in NZCF's primary submission, NZCF supports the submission.</p> <p>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.</p>	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>That the NES-CF provisions prevail.</p> <p>Failing that:</p> <ul style="list-style-type: none"> - 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. 			
Winstone Aggregates (submission number S206)				
S206.018	<p>General comments</p> <p>General comments – maps</p> <p>Supports a nuanced approach to high erosion risk land, wherein the PC1 definitions differentiate between vegetation types. However, concerned with the accuracy and quality of the mapping referenced in the definitions.</p> <p>Review mapping, or remove and the current approach relied on until robust mapping is undertaken.</p>	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 replaced with the erosion susceptibility classification in the NESPF.	Allow the submission.
S206.048	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P31: Winter shut down of earthworks.</p> <p>Considers the policy does not anticipate activities that require earthworks year-round such as quarrying. Considers shutting down winter earthworks within an active quarry will adversely impact regional aggregate supply and the ability to respond to a natural disaster. Considers insufficient justification is provided in the s32 evaluation for the shut down period. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Seeks removal of the policy and considers risk associated with unpredictable weather events can be managed through existing provisions.</p>	Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Delete Policy			
S206.076	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Policy P.P29: Winter shut down of earthworks.</p> <p>Considers the policy does not anticipate activities that require earthworks year-round such as quarrying. Considers shutting down winter earthworks within an active quarry will adversely impact regional aggregate supply and the ability to respond to a natural disaster. Considers insufficient justification is provided in the s32 evaluation for the shut down period. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Seeks removal of the policy and considers risk associated with unpredictable weather events can be managed through existing provisions.</p> <p>Delete Policy</p>	Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow the submission.
Woodridge Holdings Ltd (submission number S255)				
S255.031	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P31: Winter shut down of earthworks. Considers the policy is not effects based as not every earthworks project over 3,000m² will have negative adverse effects if works are underway between 1 June and 30 September. Considers each job should be treated on its merits and conditioned accordingly.</p> <p>Delete Policy</p>	Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow the submission.
S255.051	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Policy P.P29: Winter shut down of earthworks.</p> <p>Considers the policy is not effects based as not every earthworks project over 3,000m² will have negative adverse effects if works are underway between 1 June and 30 September. Considers each job should be treated on its merits and conditioned accordingly.</p> <p>Delete Policy</p>	Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S255.118	<p>Chapter 13 Maps</p> <p>Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.</p> <p>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.</p> <p>Provide TA District Plan style online maps.</p>	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 the submission.
S255.121	<p>Chapter 13 Maps</p> <p>Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.</p> <p>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.</p> <p>Provide TA District Plan style online maps.</p>	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 the submission.
Yvonne Weeber (submission number S183)				
S183.243	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry – controlled activity</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p> <p>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.</p>	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 the submission.
S183.244	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p> <p>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.</p>	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 the submission.
S183.245	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p>	Oppose	NZCF does not support the submission because the Rule is intended to address the	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p> <p>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.</p>		<p>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.</p>	
S183.325	<p>Chapter 9 Te Awarua-o-Porirua Whaitua</p> <p>Rule P.R19: Plantation forestry - controlled activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p>	Oppose	<p>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.</p>	Disallow the submission.
S183.326	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R20: Plantation forestry - discretionary activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p>	Oppose	<p>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.</p>	Disallow the submission.
S183.327	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p>	Oppose	<p>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.</p>	Disallow the submission.