

BEFORE THE HEARING PANEL

UNDER	the Resource Management Act 1991
IN THE MATTER	of submissions and further submissions on Greater Wellington Regional Council Plan Change 1 to the Natural Resources Plan for the Wellington Region, Hearing Stream 3.
Submitter	GUILDFORD TIMBER COMPANY LTD (Submitter S210, Further Submitter FS25).

STATEMENT OF EVIDENCE OF Timothy Stephen Rillstone

ON BEHALF OF GUILDFORD TIMBER COMPANY LTD

Dated: 5 May 2025

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1.0 Qualifications and Expertise

- 1.1 My full name is Timothy Stephen Rillstone. I am the Operations Manager for the Guildford Timber Company and have managed the operation including the harvest management of Silverstream Forest Upper Hutt since 2022. I have run my own forestry harvest management and contracting company since 2022 harvesting woodlots in the Wellington and Horizons Regions. Prior to this I was the Harvest Manager for NZ Forest Works Ltd overseeing harvest management of Silverstream Forest as well as other woodlots throughout the region since 2016.
- 1.2 I have 31 years of experience in forestry as an Arborist and hold an Arboricultural qualification, from Waikato Polytech. I am a member of the New Zealand Arboricultural Association and previous board member.
- 1.3 I also have experience in a number of diverse projects, including highway and power vegetation management, tree and woodlot removals and management for local government, commercial clients and private individuals throughout New Zealand and NSW Australia. Arborist and Senior Contracts manager for Christchurch City Council including managing council reserves and woodlots.

2.0 Code of Conduct

- 2.1 I have read the Code of Conduct for expert witnesses in the Environment Court Practice Note 2023. I agree to comply with this Code. The evidence in my statement is within my area of expertise, except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

3.0 Scope of Evidence

3.1 My statement of evidence is to provide technical forestry evidence regarding the relief sought by Guildford Timber Company (**GTC**) on the Greater Wellington Regional Council (**GWRC**) Plan Change 1 to the Natural Resources Plan for the Wellington Region for GTC. My evidence will cover the following topics:

- Response to the Officer's Report: Earthworks
- Response to the Officer's Report: Forestry and Vegetation Clearance
- Response to expert evidence from Joshua Pepperell.
- Response to expert evidence from Kevin Reardon.

4.0 Response to the Officer Report: Forestry and Vegetation Clearance and reductions in sediment discharges from plantation forestry

4.1 I have reviewed the Officer's Report analysis on the submissions. Where I am in agreement with the submission, I have not discussed this further.

Specific Provision: Rule WH.R20 & WH.P28

Specific Provision: Schedule 33 and Proposed Schedule 34

4.2 Requiring harvest activities to comply with their management plans is positive and sensible approach (and the purpose of those plans under the NES-CF). However, the requirement to make it a restricted discretionary activity goes against the intent of the NES-CF and is unnecessary. The provisions can be introduced, and compliance met without the need to change the activity status. Existing forests (at a minimum) should be permitted to operate under permitted activity status provided under the NES-CF and provide their management plans. As has been identified, these plans are already being done and already being provided to GWRC so it is unclear what is achieved by Rule WH.R20 & WH.P28.

- 4.3 The current process under the NES-CF requires forestry operators to Provide a harvest notice to GWRC that allows them to review the “plans” and provide feedback and changes, which operators take on board. The provision to require a resource consent is not going to provide for better outcomes, it will provide the same outcome at more cost. The outcome for responsible forest owners and contractors is to ensure compliance and the best environmental outcomes to minimise adverse effects on the environment. The GWRC has failed to recognise this by making works restricted or discretionary, which will add significant costs and delay.
- 4.4 The practicalities of applying for a consent in advance of harvest activities will be difficult as the method and volume on harvest will depend on the contractor availability, market conditions and weather all lining up. Currently GWRC allow some leniency with the 20 day notice period as they do not use this time to assess each notification, and realise that whether to harvest or not is dependent upon things outside an operators control. However, under the NES-CF the onus is put back on the forest owner, harvest manager and contractor to ensure compliance to the management plans as well as the national and regional regulations.
- 4.5 Not all forest owners and harvest managers/contractor’s practices comply, but that can easy be addressed through better industry engagement and compliance audits, which GWRC already does. To put in place a process that issues regional resource consents usually for long term activities of extended periods i.e. 10 to 25 years, would fail to recognise the dynamic nature of forestry management and harvest or the fast-moving improvements the industry is adapting to with new harvest methods to improve environmental and health and safety outcomes. The GWRC has the opportunity now, to manage the outcome via the harvest notice period but fails to resource it.

- 4.6 Silverstream Forest has been undertaking harvesting in a way that has been groundbreaking and meets the current standards consistently and has done so since the 1940's yet, but it will be penalised with significant additional costs of consenting, and certification of its activities particularly earthworks. The forest has been planted with extensive setbacks from streams and remnant native forest. This is not reflected by the proposed plan change and will likely mean large areas of forest will need to be abandoned, remaining uneconomic to harvest. These trees will eventually collapse which is a far worse environmental outcome for all.

5.0 Response to Expert Evidence from Joshua Pepperell

- 5.1 The main expert evidence from Joshua Pepperell focus on the council not having the resources to process and manage the permitted activity process and being able to undertake compliance. The increased demands through consenting would be detrimental to enforcement and compliance and it's better to focus on the good work upskilling the compliance team to fulfil its function under the NES-CF. Forestry is a specialised area and it would be important for Officers processing forestry related resource consents to have specific experience in forestry and forestry regulations, that is not always the case. Where GWRC does not have the processing expertise it becomes dependent upon engaging the assistance of external consultants, which often means further increased costs and delays in processing consents.
- 5.2 The program GWRC have underway in the Porirua Catchment with their consultants' undertaking audits and engagement is positive. Working with the stakeholders is going to achieve the same results at a lower cost to industry at a time when industry is already upskilling and improving to meet the new NES-CF. All stakeholders want to undertake harvesting and earthworks to the highest standard. There are existing mechanisms in place for GWRC to ensure compliance without additional regulatory duplication.

6.0 Response to Expert Evidence from Kevin Reardon

- 6.1 I note that nowhere in Kevin Reardon's evidence does it provide a recommendation or support for additional regulation. This is because he was not asked this direct question, and if he had been, his answer is likely to follow his recommendations of engagement and education.
- 6.2 Kevin Reardon has also suggested limiting harvest methods to hauler or harvest line in slopes over 25 degrees, this will not be economically feasible on a large number of smaller woodlots and still require earthworks for access, skid sites/hauler pads and back line machines to achieve lift. The harvest line machines are very limited in Te Awarua-o Porirua Whaitua (TAoP) and Te Whanganui-a- tara Whaitua (TWT) due to the terrain, forests such as Silverstream Forest and the weight of the logs mean harvest lines struggle to operate, they require extensive tracking to position for drags that will not be snagged or gain enough lift.
- 6.3 There are limited contractors available who have undertaken the technical skills required to harvest trees within TAoP and TWT, forests such as Silverstream has an extensive network of roads and tracks which requires less hauler or harvest line requirements and are retiring the stepper slopes with the gully's already maintained extensive setbacks. These areas can be harvested using ground-based methods (in appropriate conditions) which is already being implemented by the forest owners and does not require further regulatory costs.

7.0 Conclusion

7.1 I confirm in my expert opinion:

- 7.1.1 If most of the monitoring for forest activities have not been undertaken within T AoP and TWT this demonstrates how low priority and risk GWRC has viewed the forestry harvesting to date. My business as well as my employer Guildford Timber Company undertakes harvesting in this area and proactively engages with GWRC and its consultants. No stakeholders intentionally go out to damage the environment and by working closer with stakeholder the results will be achieved to ensure harvesting, and earthworks are undertaken at optimum times which is not necessarily during summer months.
- 7.1.2 Making forest harvesting a restricted discretionary activity will make most woodlots in the Region uneconomic to harvest. This will result in mature trees being left until the falling naturally which will have a devastating effect on our environment as they collapse, and the ground is destabilised particularly in erosion prone areas. It also poses a safety risk in severe weather and a fire hazard.
- 7.1.3 The lack of skilled resources within GWRC seems to be more of an issue to ensure compliance than the need to introduce greater restrictions. There is already 20 working days work for GWRC to assess and provide guidance, direction or feedback which is not being utilised under the NES-CF with only an acknowledgement of receiving the notice then putting all responsibility back to the forest owner and contractor. Better assessment and engagement by GWRC would produce immediate results, reducing risk and potential noncompliance with the additional layer of regulation.
- 7.1.4 Further regulation around methods of harvest, earthworks and stabilisation could be consider in conjunction with industry which would produce immediate results rather than adding a level of compliance and litigation.

- 7.1.5 Consideration of existing use and forests already operating should be able to continue harvesting and permitted activity status under the NES-CF with closer consideration to the harvest activities between the forest owner, contractor, harvest manager and GWRC.



Timothy Stephen Rillstone

Dated 5 May 2025