

Once you have completed your feedback, please email to regionalplan@gw.govt.nz

Please enter your details below	
*Submitter Name: Full name, or Name of Organisation / Company	Dougal Morrison
Contact person for submission: (If different to above)	Dougal Morrison
Telephone no: (Not required)	274700658
* Address for service: (Email, or physical address) Please note, an <u>email address</u> is the preferred method	dougalgbmorrison@gmail.com
* I wish to be heard in support of my submission at a hearing	Yes
* I would consider presenting a joint case at the hearing with others who make a similar submission	Yes
* I could gain an advantage in trade competition through this submission	No
Only answer this question if you answered 'yes' to the above question. I am directly affected by an effect of the subject matter of the submission that: A) adversely affects the environment; and B) does not relate to trade competition or the effects of trade competition	Select A or B
In providing a submission to Greater Wellington, I agree to having read and understood the terms and process outlined in this Information Statement	
If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:	DGB Morrison
Date:	15/12/23
Please enter your feedback in the next worksheet " 2) Feedback on Provisions ". All of the provisions in the proposed change have been included so please place your comments in the corresponding cells. If you have questions on how to use this submission form please visit our Submitter User Help Guide or email one of our friendly team at regionalplan@gw.govt.nz	

[REDACTED]
[REDACTED]
[REDACTED]

Hearings Advisor
Environmental Policy
Greater Wellington Regional Council
PO Box 11646 Manners St
Wellington 6142

By email to regionalplan@gw.govt.nz

Tēna koe Hearings Advisor

Submission on ‘Plan Change 1 to the Natural Resources Plan ‘

This is a submission on the consultation document “Proposed Change 1 to the Natural Resources Plan for the Wellington Region” dated October 2023.

I am a member of the NZ Institute of Forestry, on the National Executive of the NZ Farm Forestry Association and is recognised as a *Certified Practising Resource Manager (Leading Professional)* with the NZ Association of Resource Management. I am a former Land Management Advisor with Greater Wellington.

Key points I wish to make in this submission are:

1. That is no justification for bringing in changes to control forestry use beyond the National Environmental Standards for Commercial Forestry.
2. That any reference to National Environmental Standards for Plantation Forestry should be removed and replaced with National Environmental Standards for Commercial Forestry (NES-CF).
3. That the NES-CF should be allowed to bed in before significant changes are made to the Natural Resources plan.
4. The changes go well beyond the recommendations from the Whaitua recommendations for the Te Awarua-o-Porirua and Whanganui-a-Tara catchments.
5. GWRC has not provided any scientific evidence that forests have caused any significant degradation of freshwater quality in the Te Awarua-o-Porirua and Whanganui-a-tara catchments.
6. The proposed erosion classification of land is not helpful. The classification of land as high or highest risk does not express the absolute risk, but rather the risk relative to all other agricultural land. It would be better to use the ESC classification in the NES-CF.
7. That extra resources should be provided to a monitoring team, as per the Te Awarua-o-Porirua and Te Whanganui-a-tara Whaitua recommendations.
8. That the Section 32 analysis is fundamentally flawed and doesn’t justify the changes to rules in relation to forestry management.
9. That the proposed changes will significantly impact on forest investment in the Wellington Region, including the benefits from carbon sequestration. This will include large areas of forest owned by the Council and leased to the China Forestry Group.
10. If highly erodible land is unable to be re-planted in commercial forest species post-harvest, the land is likely to revert to some native forest with regrowth of commercial forest species

and weeds like gorse and blackberry. This is likely to result in unmanaged forests, with problems of large trees falling into streams, or inappropriate shading of streams.

11. Rules need to be appropriate to the type of forest being managed - commercial, natural and continuous forest cover. Commercial forests using a continuous forest cover approach should be allowed on the highly erodible land as a permitted activity.

Specific submission

Lack of justification for change

GWRC has not provided any scientific evidence that forests have caused any significant degradation of freshwater quality. GWRC's objectives are so broad that it will be very difficult to determine whether any new regulations for forestry will have any discernible positive effect on water quality. GWRC presents a biased view of the role of forestry, and this is borne out by the statement in the Section 32 report that forestry is responsible for the "current degraded state" of water bodies, when there is no evidence and in fact the opposite is true.

Currently, plantation forestry is governed by the NES-CF. This regulation evolved from a review of the NES-PF, to ensure that these environmental standards, especially with a focus on water quality, are fit for purpose. The NES-CF has many more restrictions and safeguards than the previous "lenient" NES-PF and was developed with substantial input from regional councils to ensure that e.g. the risk of the discharge of sediments into waterbodies is reduced. There is no evidence that the NES-PF has been detrimental to GWRC achieving its water quality objectives nor is there any evidence that the new, much more stringent NES-CF will not achieve GWRC's water quality objectives. Without such evidence, there is no reason to bring in greater controls than provided by the NES-CF.

Further, the recommendations from Te Awarua-o-Porirua WIP (Recommendations 54 and 55), and from Te Whanganui-a-Tara WIP (Recommendation 37) both propose that GWRC works with forestry groups (New Zealand Farm Forestry Association, New Zealand Forest Owners Association and contractors) to provide proactive advisory support and to better monitor compliance with the National Environmental Standard for Plantation Forestry (NES-PF). Both WIPs ask for enforcing compliance within the NES-PF, rather than advocating for more stringent regulations. They also consider that GWRC's should provide additional staffing to undertake monitoring. Groundtruth considers this would be a sensible approach.

GWRC has followed neither of these recommendations, and now embarks on much more complex and expensive regulations to fix a problem that has not been established with regulations that are unnecessary, when it has not even been able to perform its role under the NES-PF.

The RMA and reasonable use of land

Section 5 of the RMA requires resources to be managed "in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety" and Section 85 of the RMA states that "any person having an interest in land to which any provision or proposed provision of a plan or proposed plan applies, and who considers that the provision or proposed provision would render that interest in land incapable of reasonable use, may challenge that provision or proposed provision on those grounds".

The proposed plan will make it impossible for many forest owners to provide for their economic well-being or to make reasonable use of their land. Where forest land is classified as being in the "highest risk" class, the owner of such a block of land will not be able to derive any revenue from their land

post-harvest. Yet they will need to continue to incur costs, such as rates or maintenance costs for fences.

Given it is proposed that all forestry activities will be controlled activities, it will often mean that forests will not be able to be harvested due to the impossibility to meet the conditions listed in the rules. In many situations, it is unlikely that the maximum sediment level of 100 gr/m³ will be able to be met. Even in the few cases where it might be possible to comply with the proposed new conditions, additional costs for planning, documentation, experts and consent fees may make it impossible to economically harvest a forest.

If highly erodible land is unable to be re-planted in commercial forest species post-harvest, the land is likely to revert to some native forest with regrowth of commercial forest species and weeds like gorse and blackberry. This is likely to result in unmanaged forests, with problems of large trees falling into streams, or inappropriate shading of streams.

I submit that:

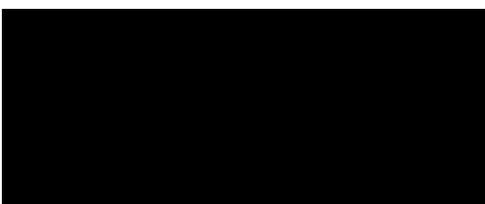
- Rules P.R19, P.R20 and P.R21 be removed from the draft plan.
- Replanting be a permitted activity subject to the permitted activity conditions in the National Environmental Standards for Commercial Forestry.
- The recommendations from Te Awarua-o-Porirua WIP (Recommendations 54 and 55), and the recommendation from Te Whanganui-a-Tara WIP (Recommendation 37) be adopted by Greater Wellington.
- That greater resources are provided to monitoring harvesting activities.

Support of other submissions

I wish to support in full the submissions of the New Zealand Farm Forestry Association Inc, and the New Zealand Farm Forestry Association's Wellington branch, on the proposed "Plan Change 1 to the Natural Resources Plan".

Attached is the cover form, which includes my details.

Ngā mihi



Dougal Morrison

Phone: [REDACTED]

Email: dougalgbmorrison@gmail.com

