BEFORE THE INDEPENDENT HEARINGS PANELS APPOINTED TO HEAR AND MAKE RECOMMENDATIONS ON SUBMISSIONS AND FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

UNDER	the Resource Management Act 1991 (the Act)
AND	
IN THE MATTER	of Hearing of Submissions and Further Submissions on Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region under the Freshwater Planning Process and Schedule 1 of the Act

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STATEMENT OF REBUTTAL EVIDENCE OF SHANNON JOHN WATSON

ON BEHALF OF GREATER WELLINGTON REGIONAL COUNCIL

HEARING STREAM 3 – FORESTRY AND VEGETATION CLEARANCE

16 May 2025

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INTRODUCTION

1 My full name is Shannon John Watson. I am a planning consultant employed by GHD Ltd.

2 I have reviewed the planning evidence and submitter statements of:

2.1 Transpower New Zealand Limited – planning evidence from Pauline Whitney and corporate evidence from Julia Kennedy [Submitter 177]

2.2 Horokiwi Quarries Limited – hearing statement from Pauline Whitney [Submitter 2]

2.3 Wellington Branch of New Zealand Farm Forestry Association – supplementary statement from Eric Cairns [Submitter 26]

2.4 New Zealand Farm Forestry Association – planning evidence from Jerome Wyeth, technical evidence from Sally Strang and supplementary statement of Egon Guttke [submitter 195]

2.5 China Forestry Group – submission from Hamish McGregor [Submitter 288]

2.6 Wellington International Airport Limited – planning evidence from Kirsty O'Sullivan and corporate evidence from Jo Lester [Submitter 101]

2.7 Guildford Timber Company Limited, Silverstream Forest Limited and The Goodwin Estate Trust – planning evidence from Chris Hansen and technical evidence from Timothy Rillstone [Submitter 210]

2.8 Winstone Aggregates – planning evidence from Charles Horrell [Submitter 206]

2.9 Rosco Ice Cream Ltd – letter from David Gibson [Submitter 220]

2.10 Forest & Bird – legal Submissions from May Downing [Submitter 261]

2.11 Environmental Defence Society – legal submissions from John Commissaris [Submitter 222]

2.12 Upper Hutt City Council – planning evidence from Gabriela Nes and Suzanne Rushmere [Submitter 225]

2.13 Wellington City Council – planning evidence from Marcella Freeman [Submitter 33]

2.14 NZ Transport Agency Waka Kotahi – planning evidence from Catherine Heppelthwaite [Submitter 275]

2.15 Porirua City Council – planning evidence from Vanessa Rodgers [Submitter 240]

2.16 Wairarapa Federated Farmers – technical evidence (mapping) from Les Basher [Submitter 193]

2.17 Wellington Water Limited – planning evidence from Caroline Horrox [Submitter 151]

2.18 Meridian Energy Limited – planning evidence from Christine Foster [Further Submitter 47]

2.19 New Zealand Carbon Farming Group – planning evidence from Ainsley McLeod

3 I have provided responses to the above statements, other than where issues are already addressed in my section 42A reports, where the author agrees with my recommendations, or where the issue is intended to be dealt with in a future hearing stream.

4 In preparing this rebuttal evidence, I have also reviewed:

4.1 Ms Alisha Vivian's and Mr Gerard Willis' rebuttal evidence;

4.2 The Statement of Rebuttal Evidence of Dr Michael Greer;

4.3 The Statement of Rebuttal Evidence of Mr James Blyth; and

4.4 The Statement of Rebuttal Evidence of Mr Tom Nation

QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT

5 My qualifications and experience are set out in paragraphs 15 – 19 of my Section 42A Report dated 15 April 2025. I repeat the confirmation given in that report that I have read and agree to comply with the Code of Conduct for Expert Witnesses.

RESPONSES TO SUBMITTER EVIDENCE AND STATEMENTS

6 This section responds to submitter evidence and further statements filed in relation to the issues and submissions allocated to the Forestry and Vegetation Clearance topic.

7 Appendix 1 sets out all the amendments sought by submitters through their evidence/statements. Appendix 2 sets out my recommended amendments in response to

submitter evidence/statements. Within Appendix 2, my Section 42A report recommended amendments are shown in red underlined or ~~strikethrough~~ and further amendments recommended in this rebuttal evidence are shown in blue underline or ~~strikethrough~~. Appendix 3 sets out a number of examples of consent conditions from forestry activities in the Wellington region, including one relevant to these Whaitua to provide some visibility to submitters about the potential scope of resource consent conditions for forestry activities.

8 I note that several of the submitter statements and planning evidence filed for this hearing are supportive of specific amendments to PC1 which I outlined in my section 42A reports. I have not responded to these in my rebuttal statement. The tables below set out my responses to remaining planning issues that I have identified within the submitter evidence/statements.

9 While noting there was no specific submitter evidence related to my s42A amendments to Schedule 27, I have made some minor amendments to Schedule 27 for consistency with terminology used in my recommended amendments for this rebuttal evidence. These amendments are documented in Appendix 2.

SECTION 32AA ASSESSMENT

10 I understand there is a requirement for a further section 32AA assessment of the changes I have recommended to provisions in Appendix 2 of this rebuttal statement. Given that provisions may warrant further changes because of information presented and considered at the hearing, it is my intention to include an updated section 32AA for the Panels as part of my right of reply, to capture all recommended changes post my section 42A report collectively.

Table 1: Summary of planning evidence from Winstones Aggregates

Point number	Summary of evidence from Winstones Aggregates (Charles Horrell)	Response
1.	Mr Horrell disagrees with the allocation of the following provisions relating to highest erosion risk land being allocated to the FPP: • Definition of 'Highest erosion risk land (woody vegetation)'; • Rules WH.R17 and P.R16 – the permitted activity rule for vegetation clearance on highest erosion risk land (woody vegetation); • Rules WH.R18 and P.R17 – the controlled activity rule for vegetation clearance on highest erosion risk land (woody vegetation); and • Rules WH.R19 and P.R18: Discretionary activity rule for vegetation clearance on highest erosion risk land (woody vegetation). Mr Horrell considers these provisions do not meet the tests for being subject to FPP for the following reasons: • The rules relating to woody vegetation clearance apply broadly to all land use activities, not solely to plantation forestry.	Mr Horrell notes that Rules R104 – R107 are identified as coastal provisions in the NRP. However, I note that only Rules R105 and R107 of the NRP are identified as coastal provisions. In responding to Mr Horrell I have identified an error in Appendix 3 of my section 42A report as it relates to Rules R104 and R106. Based on my assessment that the rules also protect the coastal marine area my recommendation should read re-assign Rules R104 and R106 to P1S1. In relation to the intent of the provisions listed by Mr Horrell in paragraph 5.5 of his evidence, as notified, in my opinion, the purpose of the rules was to protect freshwater. In my view this is clear as the rules which apply the definition of highest erosion risk land (woody vegetation) only include reference to a surface water body (which excludes water in the coastal marine area) and were included in PC1 to achieve freshwater outcomes. On this basis, I consider the allocation to the FPP was (and remains) appropriate.

Point number	Summary of evidence from Winstones Aggregates (Charles Horrell)	Response
	Accordingly, there is no direct or exclusive connection between these rules and the specific directions set out in WH.P28 and P.P26. • The provisions are not directly associated with maintaining or enhancing water quality or quantity. While the rules have an interface with water quality through potential sediment discharges, the rules relate to the use of land (e.g. Section 9 of the RMA) and are principally focused on soil conservation. • There is no clear evidence to suggest that the rules are required to give effect to the NPS-FM. While there is an indirect correlation with meeting TAS, as noted, the primary intent and function of the provisions would appear to be in managing soil conservation, rather than directly implementing freshwater objectives. For the reasons set out above, and noting recommended amendments which see existing NRP rules R104-R107 written into these rules, Mr Horrell considers that these provisions should be reallocated to the regular Schedule 1, Plan Change process and cannot be considered FPP as they now	

Point number	Summary of evidence from Winstones Aggregates (Charles Horrell)	Response
	relate to seawater and are identified as coastal provisions in the NRP.	

Table 2: Summary of planning evidence from Porirua City Council

Point number	Summary of evidence from Porirua City Council (Vanessa Rodgers)	Response
1.	In relation to P.P26 Ms Rodgers considers it is unnecessary to refer to 'resource consent application' in the policy and recommends these words be deleted.	I agree with Ms Rodgers that reference to 'resource consent application' is unnecessary as the policy will only apply where a consent is required. I recommend amendments consistent with the relief sought by Ms Rodgers in Appendix 2 of this rebuttal evidence.
2.	Ms Rodgers expresses concern about use of the term 'visual clarity' in Rule P.R19 in the section 42A Report recommended amendments as it is not clear to her where visual clarity is mentioned in Table 9.2. Ms Rodgers also expresses concern about reference to 'the most recent Wellington Regional Council monitoring record' for visual clarity as it may not account for any statistical outlier in monitoring data and suggests taking the average over a specified timeframe may be more appropriate.	Ms Rodgers is correct that Table 9.2 does not contain the words 'visual clarity'. The relevant TAS is suspended fine sediment (SFS) which is more commonly referred to as visual clarity. I agree that this could be confusing for plan users who are not familiar with this attribute and recommend an amendment to reflect suspended fine sediment in the relevant provisions and explanatory notes which refer to Table 9.2 (and also Table 8.4 for TWT). I note that the most recent Council monitoring record is not the most recent monitoring round; rather, it is the most recent reporting on the state of the TAS published by Council. Potential criteria that could be used to determine whether a TAS is being met or whether a TAS needs to change from a 'not met' to 'met' are outlined by Dr Greer in his rebuttal evidence for Hearing Stream 3. The process and frequency of reporting on the meeting

Point number	Summary of evidence from Porirua City Council (Vanessa Rodgers)	Response
		of the TAS and how this to be undertaken is an implementation matter that Council is currently working to resolve. My understanding is Council intends to provide further clarity on how this will be reported and how plan users can access this information as part of Hearing Stream 4. In the meantime, I have recommended amendments in Appendix 2 to clarify that the monitoring report is that published in accordance with section 35(2A) of the RMA for clarity.

Table 3: Summary of planning evidence from New Zealand Farm Forestry Association (Jerome Wyeth)

Point number	Summary of evidence from New Zealand Farm Forestry Association (Jerome Wyeth)	Response
1.	Mr Wyeth sets out four sequential tests that he considers need to be met to justify more stringent rules in accordance with Regulation 6 of the NES-CF and section 32 of the RMA and has assessed these tests in paragraphs 36-60 of his evidence. These tests include: • Test 1: Is there jurisdiction for more stringent rules under Regulation 6 of the NES-CF? • Test 2: Is there sufficient evidence that commercial forestry activities are resulting in	In assessing the appropriateness of recommended amendments, in order to give effect to the NPS-FM, my starting point was to determine the relevant attribute and what was required to achieve the relevant TAS in the context of PC1, as it applies to forestry. As the relevant attribute is SFS (visual clarity) and this attribute currently requires improvement in some locations to meet the TAS, I consider, the NPS-FM requires limits above and beyond those currently in place to give effect to PC1 and NPS-FM objectives. This is my justification for more stringent rules than the NES-CF. The evidence from Mr Reardon and the advice received from Mr Reardon through the preparation of my s42A report indicates there is a disconnect between the NES-CF and its ability to manage effects on water quality in these Whaitua, which illustrates the regulatory regime is not working

	the relevant TAS freshwater objectives not being achieved? • Test 3: Is there sufficient evidence that NES-CF controls are inadequate for achieving the relevant TAS freshwater objectives? • Test 4: Is there sufficient evidence that the more stringent rules being proposed will be more efficient and effective to achieve the PC1 freshwater objectives (TAS))?	effectively and will be contributing to TAS not being met. The statements of primary evidence of Dr Greer and Mr Blyth also illustrate that where SFS TAS are not being met, forestry activities will be contributing to those TAS not being met. While I agree that more work could be undertaken to determine the influence of forestry activities on achievability of the TAS, to better assess the efficacy and effectiveness of the NES-CF in these Whaitua, and to develop more nuanced rules that respond to the concerns of submitters (beyond my latest recommended amendments), the advice of Mr Reardon throughout this process indicates that more than the current requirements of the NES-CF is required to appropriately protect water quality. If not through additional regulation in PC1, I question where these improvements will be made. I do not consider it appropriate to delay imposing additional regulation until changes are made at the national (e.g. NES-CF) level[1]. This is because based on the evidence of Mr Reardon, an approximately 40% increase in harvest area is expected in these Whaitua in the next 5 years, and climate change is expected to increase the frequency and severity of adverse weather events. For these reasons water quality is at higher risk of continued degradation and pFMUs may be subject to continuation of failure to meet the SFS TAS (and therefore the objectives of PC1) in the meantime. Applying the section 32 tests of the RMA through the lens of clause 1.6 of the NPS-FM, I consider relying solely on the NES-CF, with support of recommended non-regulatory methods, is not an acceptable response where TAS are not being met, as this, in my opinion, equates to

[1] I have been made aware by Mr Reardon work is being progressed on amendments to the NES-CF however at the time of this rebuttal evidence I am not aware of any government direction on timeframes or the scope of any amendments being considered

		delaying decision making because of uncertain information and would be inconsistent with the NPS-FM.
2.	Mr Wyeth considers Rule WH.R20 and Rule P.R19 present some implementation challenges for commercial forestry due to the lifecycle of plantation forestry. Mr Wyeth notes this applies to approximately 73% of the land in PC1 Whaitua and is concerned this means that resource consent requirements may change over the course of the lifecycle of a forest in response to a monitored change in the TAS for suspended fine sediment (visual clarity).	Mr Wyeth notes that Rules WH.R20 and P.R19 would apply to approximately 73% of the land in PC1 Whaitua. My understanding from Dr Greer is that this is incorrect and approximately 61% of the land in PC1 Whaitua is within pFMUs where the SFS TAS is not met, noting that forestry only makes up a small proportion of the overall land in those pFMUs (totalling ~10%). Concerns about uncertainty because of a perceived high frequency of changing of the TAS are addressed by Dr Greer. Importantly, Dr Greer states that because trend analysis needs to be undertaken, it is unlikely that Council would be able to report on the current state of a pFMU against the TAS any more frequently than 5-year intervals. As described in my response to Ms Rodgers in Table 2, Council is currently developing its implementation framework for PC1, including how TAS will be reported on and how this information will be used to implement the provisions. Council will provide their proposed implementation framework as part of Hearing Stream 4.
3.	Mr Wyeth considers the proposal to apply a restricted discretionary activity status through Rule WH.R20 and Rule P.R19 to the majority of commercial forestry activities is problematic, citing the following examples: (a) plantation forest established as a permitted activity could require resource consent as a	In response to (a), this would be no different to a member of the public purchasing a plot of land and intending to develop it based on a permitted activity status in a regional plan and the rules subsequently changing due to a plan review process resulting in a consent being required (e.g. PC1 introducing new stormwater discharge rules). In my view, this is a reality of regional resource management processes where Councils are tasked with

	restricted discretionary activity during the subsequent stages of harvesting and associated earthworks with no certainty that resource consent would be granted. (b) Rule WH.R20 and Rule P.R19 would appear to require restricted discretionary resource consent for earthworks at any stage of the forestry lifecycle regardless of the scale or its proximity to water bodies. (c) A restricted discretionary activity resource consent for afforestation seems overly restrictive in some instances where this may actually reduce sediment discharges, such as when converting from pasture and for permanent carbon forestry (i.e. exotic continuous-cover forest under the NES-CF). (d) It can be problematic to apply for resource consent for all relevant plantation forestry activities over the forestry lifecycle (i.e. from afforestation/replanting through to harvesting) given the exact nature of future earthworks and harvesting activities may not be known at the time of afforestation or replanting and may change in response to new technology or practices. Mr Wyeth suggests there are practical issues associated with consent duration and lapse	responding to changes in national direction or emerging resource management issues. Section 20A of the RMA governs this issue. In my opinion, concerns about the ability for Council to decline consent are being overstated by submitters. In my experience, declining a consent is generally a last resort for Councils. It is likely that expected effects would need to be significant or 'more than minor' which would also trigger a notified consent process. If this was a potential outcome, from my experience, Council would be signalling concerns about the effects of the proposal and looking to work with the applicant to assist them to manage effects. I also consider effects are unlikely to meet the threshold for significant or 'more than minor' at a small woodlot scale (which is the focus of NZFFA). In response to (b), amendments to the rules in Appendix 2 of this rebuttal evidence result in consent for listed activities only being required where a discharge to surface water is likely. If earthworks or vegetation clearance are not expected to result in a discharge which enters surface water then the rule (either WH.R20 or P.R19) would not apply. In my opinion, it is difficult to draft rules more refined than this for these activities without duplicating the NES-CF given the spectrum of matters permitted activity regulations in the NES-CF cover and the lack of guidance about what any more stringent standards might need to be (i.e. specific setback distances, earthworks volumes and areas etc). In response to (c), I agree restricted discretionary activity for afforestation may be overly restrictive in some situations. My recommended amendments in Appendix 2 now incorporate the PC1 erosion risk mapping in the definition of 'forestry management plans' and Policies WH.P28 and P.P26 in response to the evidence of EDS and the rebuttal evidence of Mr

	periods which appear to be overlooked in the section 42A report and that the sum of the recommendations could be multiple consent requirements over the forestry lifecycle which could have a significant cumulative economic impact for commercial forestry in the two Whaitua. For these reasons, Mr Wyeth states that further consideration should be given to a more nuanced approach to the activity status of commercial forestry rather than the somewhat blanket approach in proposed Rule WH.R20 and Rule P.R19 for the listed commercial forestry activities.	Blyth and Mr Nation which support the use of the erosion risk mapping as the best available information. However, given the limitations of the erosion risk mapping, I still consider it is only suitable to guide where further assessment of risk is required rather than for use in a rule, and therefore regulation of afforestation is required in WH.R20 and P.R19 to support Policy CC.6 of RPS Change 1. I have recommended amendments in Appendix 2 of this rebuttal statement to provide better direction around the matters of discretion that will apply to afforestation and show that the effects of afforestation that Council seeks to manage are those during future earthworks or harvest phases (i.e. requiring larger setbacks or avoiding afforestation of plantation forest in particularly high-risk areas (once these are identified). I note that based on the evidence of Mr Reardon, afforestation is not being undertaken at a significant scale in these Whaitua. In response to (d), while I acknowledge the concerns of Mr Wyeth, I do not consider these pose a significant implementation issue. This is because, in the case of afforestation or replanting if it was to be undertaken now (or soon), harvesting is not likely for at least 25 years. I consider it would be unlikely a landowner or forest manager would apply for consent to harvest at the same time they are seeking consent for afforestation and equally that Council would be unlikely to grant consent for an activity that will occur that far in advance. There is nothing to preclude activities that will be undertaken at the same time (i.e. earthworks, harvest and replanting) or around the same time being grouped into one consent application to minimise the administrative burden or costs for landowners. In addition, for larger sites, or sites where forestry activities are expected to occur over a number of years, conditions of consent can require management plans to be provided prior to each relevant stage or phase of forestry rather than

		all at once. Larger forestry operators can also apply for global consents to minimise any ongoing consenting costs. In response to submitter evidence, including that of Mr Wyeth, I have provided more nuance to the recommended restricted discretionary activity rules such that the rules in PC1 no longer apply to afforestation or replanting[2] for exotic continuous-cover forestry and to reframe Rules WH.R20 and P.R19 to focus on the discharge of sediment for earthworks, harvesting, vegetation clearance and mechanical land preparation, rather than the use of the land. I welcome an opportunity to work with submitters, including Mr Wyeth, on further refining the provisions during the hearing process.
4.	Mr Wyeth raises concern about duplication of the management plan requirements of the NES-CF in PC1 and this appearing contrary to s44A of the RMA and that a need for duplication of the management plan requirements in his opinion indicates that the management plans in the NES-CF are achieving desired outcomes and are unnecessary in PC1.	My understanding from discussions with Council Officers and Mr Reardon as part of the development of my s42A report is that the information requirements outlined in Schedules 3, 4 and 6 of the NES-CF are largely appropriate and are an improvement on what was in place before the NES-PF came into effect in 2017. What is missing is the ability for regulators to *require* changes to mitigation or management measures proposed in any management plans submitted before an activity occurs. Under the requirements of the NES-CF, if this information is included (regardless of its appropriateness to the specific context) the plan meets the requirements of the relevant schedule. There is no safeguard or control over the appropriateness of the mitigation measure proposed in the plan. It is not until an adverse effect occurs, resulting in a complaint and investigation, or a compliance inspection shows the standards of the NES-CF are not being met, that Council can statutorily intervene. The difference in outcomes when comparing the requirement for a consent in PC1, subject to my

[2] Noting from my understanding that replanting of exotic continuous-cover forestry over the life of this plan is unlikely

		recommended amendments, and relying solely on the NES-CF, is increasing the ability for Council to prevent and otherwise minimise adverse effects to water quality before they occur.
5.	Mr Wyeth raises concerns about equity issues and the difference in approach between commercial forestry and pastoral farming.	I acknowledge Mr Wyeth's (and other submitters') concerns about a perceived difference in approach between forestry and other rural (and urban) land uses. I am unable to comment on the approach to rural land use activities and how this aligns with the NPS-FM (that is a matter for Mr Willis) however I outline the rationale for my recommended provisions and how this aligns with the NPS-FM at Table 3 (Point 1) above. I consider concerns about equity can be most simply explained by pointing out the difference in starting point between rural land use activities and forestry. Forestry already has an NES-CF, so in order to impose limits over and above the existing regulatory framework where SFS TAS are not met, to meet objectives in accordance with the direction of clause 3.12 (1) of the NPS-FM, requirements over and above the NES-CF are required.
6.	While Mr Wyeth considers more stringent rules in PC1 do not meet the stringency test in Regulation 6 of the NES-CF and provisions in PC1 related to commercial forestry should be deleted, Mr Wyeth documents potential options to address his concerns with recommended amendments in the event the Panel considers additional stringency is necessary. In summary, these include: (a) A permitted activity rule that states the NES-CF management plan requirements apply	In response to Mr Wyeth (and other submitters), I recommend deletion of Schedules 34A-C and to instead include cross-references to the relevant requirements of them (insofar as they relate to water quality) in the definition of 'forestry management plans'. In addition to the more detailed contour mapping I recommended as part of my s42A report, as part of this rebuttal I also recommend including additional information requirements related to identifying sites at higher risk of effects from forestry activities, such as sites identified in Schedules C, F, H and I of the NRP and areas of land identified as "potential erosion risk land" and the specific management measures that will be used to manage effects on potential erosion risk land, in response to the legal submissions of EDS and the

	but with an additional requirement for a finer scale of mapping and risk assessment (e.g. 5m contour scale rather than 20m). (b) Refining the blanket restricted discretionary consent requirement for the relevant commercial forestry activities. Mr Wyeth suggests it is important that any resource consent requirements for afforestation or replanting do not disincentivise these land use activities given they contribute less sediment than other land uses in the longer term and that a restricted discretionary activity status for earthworks or vegetation clearance, regardless of scale, is overly onerous and it would be more efficient to rely on the NES-CF permitted activity regulations for these activities or apply a less stringent activity status in his opinion.	rebuttal evidence of Mr Blyth and Mr Nation with regard to PC1 erosion risk mapping being the best available information. These recommended amendments have the benefit of avoiding the PC1 Schedules becoming 'out of step' in the event of future changes to the NES-CF. In my opinion, the practicalities of requiring a management plan to be provided to support an activity as part of a permitted activity rule will have the same limitations as the current NES-CF regime, being Council's lack of approval/certification ability when it comes to the appropriateness of any of the information provided in the management plan. In addition, a less stringent activity status (controlled activity) is not an appropriate option as there could be situations where PC1 would be more lenient than the NES-CF, and the NES-CF only allows for this in relation to afforestation[3]. Alongside the ability for Council to retain an ability to decline consents where potential adverse effects (including those during future harvest in the context of location of afforestation or replanting) would be unacceptable to support Policy CC.6 of RPS Change 1, in my opinion, this means a restricted discretionary activity is the most appropriate activity status. As described earlier in this rebuttal statement, I welcome any opportunity to work with submitters to refine the forestry provisions as part of the hearing process.

[3] I have addressed my position on the need for PC1 to regulate afforestation (excluding that of exotic continuous-cover forest) in Table 3 (Point 3)

Table 4: Summary of statement from New Zealand Farm Forestry Association (Egon Guttke)

Point number	Summary of statement from New Zealand Farm Forestry Association (Egon Guttke)	Response
1.	Mr Guttke raises concern about equity and that forestry owners seem to be being penalised whereas other activities are not subject to the same restrictions.	I refer to my response to Mr Wyeth at Table 3 (Point 5) above.
2.	Mr Guttke considers recommended rules are not effects based and raises concerns about the ability for activities outside of the forestry sector and outside of the control of forestry operators and landowners to impact visual clarity TAS.	In response to concerns about the rules not being effects based I refer to my response to Mr Wyeth at Table 3 (Point 3) and revised recommended provisions in Appendix 2 of this rebuttal evidence. The concerns about SFS TAS and the ability for activities outside of the control of forestry operators and landowners to influence TAS are addressed by Dr Greer in his rebuttal evidence for Hearing Stream 3.
3.	Mr Guttke suggests recommended amendments will make it impossible for some forest owners to provide for their economic well-being or to make reasonable use of their land and would be inconsistent with s5 and s85 of the RMA. Mr Guttke cites concerns about ETS penalties in the event a consent for replanting cannot be obtained and suggests in some situations it will be impossible for forestry harvesting to meet all of the conditions in a restricted discretionary consent, or even obtain consent and that this would leave a land owner, who 30 years ago planted a block of trees, with no income and a stranded asset.	The purpose of the RMA and sustainable management as outlined in s5 is managing the use, development, and protection of natural and physical resources 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 ... (my emphasis added) *while —* *(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*

Point number	Summary of statement from New Zealand Farm Forestry Association (Egon Guttke)	Response
		(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and *(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment*. This means, that while it is important for communities to be able to provide for their social, economic and cultural well-being, this is not to be at the expense of the environment. I note Te Mana o te Wai, the underlying principle of the NPS-FM, also prioritises the health and well-being of freshwater and, in my opinion, my recommended amendments are consistent with this hierarchy of obligations. In response to concerns about unreasonable use and s85 of the RMA, I do not consider the requirement to obtain a restricted discretionary activity will render land incapable of reasonable use.
4.	Mr Guttke notes concerns with the impact of classifying forestry activities as restricted discretionary where TAS are not met. These include: (a) Lack of certainty that a consent for an activity can be obtained, and a land owner may be able to obtain a consent for harvesting, but not for replanting and the uncertainty being exacerbated because it depends on the TAS at the time of the activity	In response to (a), while I acknowledge the perception that a restricted discretionary activity might mean consent is unable to be obtained and could impact investment, based on my experience, in practice, resource consents, particularly restricted discretionary activity consents, are very rarely declined and if they are, it is for good reason. I address the lack of certainty related to the TAS and implications for consents in my response to Mr Wyeth at Table 3 (Point 1) and (Point 3). In response to (b), I have addressed this in my response to Mr Wyeth at Table 3 (Point 3).

Point number	Summary of statement from New Zealand Farm Forestry Association (Egon Guttke)	Response
	taking place and this may lead to financial implications. (b) Questions the rationale for regulating afforestation which would reduce the amount of sediment and achieve a better environmental outcome (c) Costs associated with a restricted discretionary consent. Mr Guttke considers from his more than 30 years of experience with forestry, that these additional costs will make any planting of trees up to 5 hectares uneconomical as the rate of return will be below the cost of capital. (d) The proposed discretionary consent for harvesting will create a strong disincentive for any afforestation project and Mr Guttke questions who will invest in forestry when there can be no certainty that a mature forest can be harvested to generate a return. Mr Guttke notes the evidence shows alternative land uses are producing more sediment than forestry and suggests the proposed regulation will lead to a worse outcome and	In response to (c), I acknowledge concerns about increases in costs for landowners given the uncertainty about costs associated with any resource consent process. I have attempted to minimise potential costs by aligning the expected information requirements for the consent process to those a landowner would already be expected to provide to be consistent with good management practice, with some additional information related to more detailed contour maps and identification of sites which are expected to have a higher risk of, or be more sensitive to, sediment impacts. If a landowner or forest manager is preparing appropriately detailed management plans and undertaking forestry operations in accordance with good management practice then, in my opinion, it is reasonable to expect that any costs borne over and above those expected under the NES-CF would be limited to the consent application and processing fee. I understand from submitter evidence that landowners are already generally engaging professionals to prepare the management plans required by the NES-CF. In addition, Council offers free pre-application advice and plans to amend the forestry page on Council's website and the existing forestry consent application forms to reflect any required changes arising from PC1, effectively 'stepping' landowners and forest managers through the information requirements for any consent application to further minimise the costs for landowners and forest managers. In-time as my recommended non-regulatory methods (M44A and M44B) are established and implemented and relationships between Council and the sector improve, Council's expectations will become clearer to the forestry sector,

Point number	Summary of statement from New Zealand Farm Forestry Association (Egon Guttke)	Response
	would be inconsistent with climate change commitments.	further reducing any potential uncertainty about costs of consenting and compliance. I have discussed Mr Guttke's concerns about consenting and compliance costs potentially rendering small woodlots unviable with Mr Reardon. The advice from Mr Reardon is that the additional costs expected to be incurred for consenting and compliance are unlikely to "make or break" small woodlot forestry activities. While not providing a statement of rebuttal, Mr Reardon can address this matter in further detail at the hearing. In response to (d), I address these concerns and the reasons for regulating afforestation in my response to Mr Wyeth above.

Table 5: Summary of statement from Wellington Branch of New Zealand Farm Forestry Association

Point number	Summary of statement from Wellington Branch of New Zealand Farm Forestry Association (Eric Cairns)	Response
1.	Mr Cairns raises the same stringency concerns as Mr Wyeth (NZFFA), Mr Hansen (Guildford Timber, Silverstream Forest and Goodwin Estate) and Mr MacGregor (China Forest Group).	I refer to my response to Mr Wyeth at Table 3 (Point 1).
2.	Mr Cairns proposes a hierarchy of preferred outcomes. In order of preference, this includes the NES-CF prevailing, an alternative approach to regulate forestry activities as a controlled activity on	I have made a deliberate decision not to reference the NZFOA Code of Practice or Forest Practice Guides or the Road Engineering Manual in Policies WH.P28/P.P26 and Rules WH.R20 and P.R19 in recognition that I accept there will be other methods or measures not included in these

Point number	Summary of statement from Wellington Branch of New Zealand Farm Forestry Association (Eric Cairns)	Response
	steeper land where the visual clarity TAS are not met and potential amendments to restricted discretionary activity rules if controlled activity status is not accepted. Mr Cairns makes the following comments (in summary): • At first sight, the rules appear to default to granting consent for harvesting and earthworks subject to contractors following NZFOA best practise guidelines and this is supported. However, there is concern about Council Officers requiring additional safeguards over and above those described in the NZFOA best practise guidelines and that "standard" methods listed in the NZFOA good practise guides might not be sufficient and that Council could ask for expert reports to justify that a proposed approach would indeed minimise loss of sediment. Mr Cairns cites concerns about a need for chemical treatment and winter works restrictions in particular. • The FOA Best Practise Guidelines are not an exhaustive list of mitigations, as use of coppicing or more durable species, longer	guides that may be appropriate, such as the *Erosion and Sediment Control Guidelines for the Wellington Region 2021*, and that in some instances, based on the characteristics or constraints of any particular site, alternative solutions will be required. I have also recommended an amendment to WH.P28 and P.P26 providing direction for Council to include good management practice, and other practice guidance, or sector-based initiatives which improve land management in the regulatory framework where practicable. In response to concerns about conditions requiring chemical treatment or winter works restrictions, I provide examples of forestry consent decisions from the Wellington Region (recognising most of these are not from these Whaitua) in Appendix 3 to this rebuttal evidence to illustrate the scope of consent conditions that have been applied to forestry activities by Council. I note that there are no requirements for chemical treatment or winter works restrictions in conditions on these consents. However, it will be up to Council to determine the nature and appropriateness of any consent conditions that they consider may be required to manage potential adverse effects based on the risks associated with any specific forestry activity and the status of the receiving environment (is there a trend of degradation), as directed by recommended amendments to Policies WH.P28 and P.P26 in Appendix 2 of this rebuttal evidence. In response to how restricted discretionary consents "add value" compared to a regular consented activity, this is addressed in my response to Mr Wyeth at Table 3 (Point 3) above. In my opinion, restricted discretionary activity status is the most appropriate for those reasons.

Point number	Summary of statement from Wellington Branch of New Zealand Farm Forestry Association (Eric Cairns)	Response
	rotation times between harvesting, small coupe harvesting or continuous cover canopy regimes are not presently in the NZFOA guidelines. • The effectiveness of some of the mitigations may not be apparent until next harvest cycle, e.g. larger planting setbacks or retiring out awkward corners at time frames much longer than used to assess trends in median visual clarity and beyond the 2040 window to achieve visual clarity TAS. • Questions how restricted discretionary consents "add value" to council control compared to regular consented activity.	
3.	Mr Cairns submits concern about discouragement of investment in forestry and the growing number of conditions and compliance costs for small woodlots and that some small forests may become unviable (economically). Mr Cairns is also concerned regulations designed to control the effects of forestry will discourage landowners from forestry and may encourage use of livestock and that this will result in poor environmental outcomes.	I have addressed this in my response to Mr Guttke and Mr Wyeth above

Point number	Summary of statement from Wellington Branch of New Zealand Farm Forestry Association (Eric Cairns)	Response
4.	In relation to Objective WH.O9 and Table 8.4 Target Attribute States, Mr Cairns notes he commented on these topics in his original submission and further submission for Hearing Stream 2 but considers the section 42A report relating to Forestry indicated a change in approach, i.e. requiring restricted discretionary consent only where downstream (including receiving environments) TAS for clarity is not met, with reference to the Hutt River at Boulcott site failing to meet SFS TAS and therefore imposing restricted discretionary consents for forestry activities in the upstream Whakatikei, Akatarawa, Pakuratahi, where pFMUs are compliant for TAS VC. Mr Cairns notes recommended changes in the s42A report do not explicitly include downstream receiving environments and suggests WH.R20 needs clarification	In his rebuttal evidence, Dr Greer states that if land-use activities and discharges contribute to freshwater quality at a TAS site, they should be managed in accordance with the TAS set for that site, regardless of whether they are conducted within the boundaries of that pFMU. Relevant to the concerns of Mr Cairn's (and many other submitters), Dr Greer suggests if PC1 does not take that approach there is very little chance of achieving the TAS for the Te Awa Kairangi lower mainstem pFMU (Hutt River at Boulcott TAS site) as the boundaries of that pFMU effectively only cover the bed of the Hutt River. In Dr Greer's opinion, and consistent with the way I have been interpreting PC1, achieving the SFS TAS relies on managing land-uses and discharges in those pFMUs that flow into the Hutt River above this TAS site. The evidence from Dr Greer also demonstrates that regardless of the 'condition' of the relevant pFMUs upstream of this site, sediment load reductions are required from all major tributaries to achieve the SFS TAS. I have recommended amendments to the note above Rule WH.R20 and to WH.R20 (and P.R19) to clarify where the relevant TAS apply, being the relevant TAS sites (including any TAS sites downstream of a commercial forestry activity) listed in Tables 8.4 and 9.2 to provide greater clarity to plan users. I note that the only location where upstream TAS sites are impacted by a downstream TAS site is in the Hutt River. This does not apply to any other pFMUs. I note that the appropriateness of this TAS is outside the scope of my expertise and is a matter that should have been addressed in Hearing Stream 2 in relation to objectives. I am implementing the requirements of PC1 and the NPS-FM based on the TAS as they currently stand (i.e. SFS TAS at the Hutt River Boulcott site having a target of A state).

Table 6: Summary of planning evidence from Guildford Timber Company Limited, Silverstream Forest Limited and Goodwin Estate Trust

Point number	Summary of evidence from Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust (Chris Hansen)	Response
1.	In relation to WH.P28, Mr Hansen states recommended amendments change the notified intent of the policy, being to reduce sediment discharges from commercial forestry activities (through the notified controlled activity Rule WH.R20) to applying a greater level of scrutiny and control over these activities by giving regard to the quality of the receiving environment, introducing a more stringent consenting process as determined through the TAS framework, and improved forestry management plan preparation and compliance. Mr Hansen states that while in principle the Officer has simplified the provisions relating to forestry activities to one policy, one rule and the additional explanatory text preceding the rule, in his opinion there are a number of planning issues with the recommended approach. Mr Hansen particularly notes that the section 42A report does not make it clear why a more restrictive rule is required than the originally notified controlled activity status.	PC1 as notified required all listed forestry activities to obtain, as a minimum, a controlled activity status. Of note, controlled activity conditions as notified included meeting the SFS (visual clarity) TAS. If SFS TAS were not met, the activity status was discretionary. In contrast, my recommended amendments are less stringent than PC1 as notified, letting the NES-CF prevail where TAS are met and requiring a restricted discretionary activity where TAS are not met, while constraining matters of discretion to those related to the impacts of sediment on water quality. The reasons restricted discretionary activity status has been recommended are discussed in response to Mr Wyeth at Table 3 (Point 3).
2.	Mr Hansen considers the recommended planning mechanism has a number of issues:	In response to (1), Mr Hansen's concerns about implementation and reporting of the TAS and how a resource user will know whether or not they need a consent, I refer to my response to Ms Rodgers and Mr Wyeth above

	1) A resource user does not know if they require a resource consent until they have located the most recent monitoring records for the monitoring site within the pFMU closest to them, and those records show the visual clarity TAS is not being met. There is concern once a resource user has gained approval under the NES-CF to undertake commercial forestry activities that an additional consent would be required under PC1 and to add to the uncertainty, future monitoring may show the TAS is being met again, and the resource user didn't need to apply for a resource consent after all. 2) Recommended amendments require that if there is a change in condition of the pFMU, any listed commercial forestry activities will be regarded as requiring a restricted discretionary activity consent, regardless of whether any previous commercial forestry activities have been undertaken, or if those activities have contributed to the degradation of the visual clarity TAS in the pFMU 3) The planning mechanism makes no distinction regarding location, scale or level of effects the proposed activity has. In Mr Hansen's opinion this is inappropriate and	regarding Council's plan to address implementation of the TAS in Hearing Stream 4. In response to (2), I read this as concern about the ability for SFS TAS to change over the life of a forest and the risks or uncertainty in terms of timing for applying for consents. I address the need for all land use activities where TAS are not being met to do their bit to achieve SFS TAS at the Hutt River Boulcott TAS site in response to Mr Cairns above. This is addressed in further detail in the rebuttal evidence of Dr Greer. In regard to (3), I disagree with Mr Hansen's view that recommended rules make no distinction regarding location, scale or level of effects the proposed activity has. Recommended rules only apply to locations where improvements to SFS are required to meet TAS. In response to the evidence of submitters, I am recommending amendments to reframe the rules (WH.R20 and P.R19) to focus on the discharge of sediment rather than use of the land. Other than for afforestation and replanting (for the reasons discussed in Table 3 (Point 3), this will mean rules in PC1 only apply where the SFS TAS is not met and the activity will result in a discharge of sediment entering surface water. As noted in my response to Mr Wyeth, I welcome an opportunity to refine the forestry provisions during the hearing. In response to (4), I have recommended further amendments to Policy WH.P28 (and P.P26) in response to submitter evidence, of note to the concerns of Mr Hansen, these amendments provide clarity that the policy seeks to direct Council to have regard to the need for any specific conditions of consent where SFS TAS are not met or where receiving environments are sensitive to sediment accumulation (e.g. Pauatahanui Inlet or Makara Estuary), noting these policies also apply where consent is required outside of PC1 and therefore will not just apply where TAS are not

	unacceptable, is not effects based and does not represent good planning practice. 4) When considering the recommended amended wording of clause (a) in Policy WH.P28 it is confusing as to how it should be interpreted. In particular, Mr Hansen suggests it is not clear when or how a downstream receiving environment that is sensitive to sediment accumulation may affect any restricted discretionary activity resource consent required. Based on his concerns about the recommended planning mechanism, Mr Hansen has proposed alternatives. These include: 1) Delete these provisions from the NRP and instead rely upon the newly updated NES-CF; 2) If the Hearing Panel decide to retain the provisions, substantially re-draft Policy WH.P28 and Rule WH.R20 to address any resource management matters that are not already regulated by the NES-CF, including a permitted activity rule to mirror the NES-CF but included 'added effects' not dealt with in the NES-CF permitted activity standards;	met (i.e. also apply where an activity cannot meet NES-CF permitted activity regulations). Dr Greer responds to Mr Hansen's request to use more defined drainage catchments as the geographical area in his rebuttal evidence.

	3) If the Hearing Panel decides to continue with the visual clarity TAS approach, replace the broad pFMU by using the more defined drainage catchments as the geographical area.	
3.	Based on the supporting evidence of Mr Rillstone, Mr Hansen considers it is questionable whether there is a sufficient evidential basis to justify or establish the need for these provisions, or for the Hearing Panel to be confident that the additional limits proposed by GWRC in PC1-NRP are warranted, (or needed to control sediment loads associated with commercial forestry's effect on water quality) particularly given that the NES-CF has recently been reviewed and updated by Government and is in the early stages of being implemented.	In response to Mr Hansen's concerns about the evidential basis to justify provisions which go beyond the NES-CF (stringency test), I refer to my response to Mr Wyeth at Table 3 (Point 1) above.
4.	Mr Hansen challenges the allocation of provisions – specifically the definitions which are drawn from the NES-CF, Policy WH.P28 and Rule WH.R20 being allocated to the FPP (noting his concerns about the allocation of other provisions in PC1 being allocated to the FPP have been resolved by virtue of recommended deletion of those provisions).	My position on the allocation of provisions has not changed to that presented in Appendix 3 of my s42A report. In my view it was clear that the intent of the provisions as notified was to manage impacts of land use activities on freshwater quality and it is appropriate that these provisions were assigned to the FPP.
5.	While Mr Hansen notes he supports my recommendation to delete Schedule 34 he does not support recommendations to replace this schedule	I refer to my response to Mr Wyeth at Table 3 (Point 3) and my recommended amendments to the forestry management plans definition in Appendix 2 of this rebuttal evidence. In my opinion, these recommended

	with Schedules 5, 6 and 8 (*I note this appears to be a mistake and should read Schedules 3, 4 and 6*) of the NES-CF, and seeks instead the Hearings Panel insert a note in an appropriate location within the NRP that records that these schedules apply.	amendments are consistent with the relief sought by Mr Hansen on this point.

Table 7: Summary of statement from China Forestry Group

Point number	Summary of statement from China National Forestry Group (Hamish McGregor)	Response
1.	If consenting is to be required Mr McGregor is of the view that the wording of WH.P28 needs to be amended as "*requiring resource consent applications to demonstrate that erosion and any discharge of sediment will be minimized……*"is not reflective of what is possible. To 'demonstrate' generally implies an ability to show or prove something – in this case, that sediment discharges will be minimized, the latter implying a level comparable to a range of values that might exist. CFG believes the text should be amended to *"requiring resource consent applications to document the management practices that will be applied to manage and limit erosion processes that may contribute to discharges of sediment into receiving waters environments……"*	I recognise the concerns of Mr McGregor and have recommended amendments to WH.P28 and P.P26 which in my opinion better align with the relief sought by CFG on this point.

Point number	Summary of statement from China National Forestry Group (Hamish McGregor)	Response
2.	Mr McGregor suggests there is ambiguity between the language used in the proposed recommendations for the policies and other phraseology used in relation to rule WH.R20 & P.R19. Mr McGregor questions whether having "regard to the quality of the receiving environment; particularly in part Freshwater Management Unit's where visual clarity TAS' are not met….." potentially implies: (a) one does not need to have as much regard if the relevant FMU TAS is met but a consent will still be required, or (b) only if the part FMU within which the commercial forest is located fails the TAS standard will consenting be required or (c) consenting might be required if the part FMU in which the forest is located meets the TAS but this part FMU is a tributary to the wider FMU in which it exists which fails the TAS threshold.	I have recommended amendments to WH.P28 and P.P26 to make the policy intent clearer, as shown in Appendix 2. As WH.P28 and P.P26 also apply in situations where consent is required outside of PC1 (i.e. NES-CF permitted activity regulations are not met) it is important to have regard to the sensitivity of downstream receiving environments to discharges of sediment and for Council to be able to develop conditions which appropriately protect these receiving environments. I have also recommended amendments to the explanatory note and Rules WH.R20 and P.R19 to make it clearer where the TAS apply. In short, my recommended approach is consistent with point (c) in Mr McGregor's evidence. In the case of the Hutt River at Boulcott TAS site, the intent of my recommendations and how I understand PC1 should be implemented, is that because SFS TAS at this site is not being met, all those pFMUs upstream are contributing to the TAS not being met. I address this in response to Mr Cairns above and the scientific rationale for this is described in the rebuttal evidence of Dr Greer.
3.	Mr McGregor supports the removal of the prohibition on new forestry activities and the retirement of existing forest areas and consider this will substantially reduce the potential gross liability	While I recognise the concern of Mr McGregor, and I have noted concerns about the need for further evaluation of impacts for landowners under the ETS before rules which prevent or restrict use of land are imposed in my section 42A report, I consider it is important for Council to retain an ability

Point number	Summary of statement from China National Forestry Group (Hamish McGregor)	Response
	under the ETS at a regional level. However, CFG are concerned if consenting remains discretionary, consents for replanting may be refused and that this suggests that while the probability of an occurrence of ETS liabilities, is reduced, it may well remain for some. At the property and particularly small scale (few to 10s of hectares), the impact could be financially significant or result in abandonment of the crop which brings its own long-term complications. CFG suggest that in these situations, there should be a policy provision closely linking GWRC land management programs to assist an affected landowner to achieve revegetation compatible with the ETS requirements.	to decline consents where an activity has the potential to result in unacceptable adverse effects. I consider it unlikely that forestry at the scale nominated by Mr McGregor would result in effects that would be considered unacceptable and which could lead to Council declining consent. Concerns about uncertainty regarding the ability to obtain consent are addressed in my response to Mr Wyeth. My recommended amendments to PC1 need to be viewed as a package; non-regulatory methods in both the RPS Change 1 (Method CC.4) and my recommended Method M44A require Council to work with stakeholders, i.e. the forestry sector, to identify those areas where adverse effects are expected to be highest and the most appropriate means to manage adverse effects in those areas. I have recommended amendments to Policies WH.P28 and P.P26 to better promote and support indigenous and exotic continuous-cover forests and alternative forestry practices and strategies. I do not consider a policy linking land management programmes to assist landowners in achieving revegetation compatible with the ETS requirements to be necessary as this may unintentionally preclude other options. I consider the means to identify and develop ways to support landowners best manage those areas of land identified as being at highest risk of effects from forestry are best established through non-regulatory methods.
4.	CFG state proposed Schedules 34A-C are almost identically aligned with the management planning	I refer to my response to Mr Wyeth above.

Point number	Summary of statement from China National Forestry Group (Hamish McGregor)	Response
	requirements of the NES-CF and support the use of these planning functions but do not see a clear link between the benefits claimed for linking these plans to a consent as having material effect in providing clarity to users as to what constitutes good practice, the information required for the consent or how this further demonstrates how adverse effects on water quality can be managed.	
5.	While noting the wording used in Policies WH.P28 and P.P26 and Rules WH.R20 and P.R19 seem to align, CFG suggests ambiguity exists, questioning whether the explanatory note in rule WH.R20 is correct or expressed incorrectly. This concern is related to the implementation of the TAS and where TAS is to be interpreted, with reference to the Hutt River at Boulcott TAS site resulting in those pFMU's upstream being subject to a consent requirement. CFG remain concerned with the application of TAS and where rules apply, with reference to the Hutt River. This is because part FMUs that are currently at A state and which include forestry and have included forestry operations over numerous years, would be caught under the proposed consenting framework. CFG question the validity of regulating forestry (and other land use) activities upstream of the Hutt River	I confirm the explanatory note is correct albeit 'clunky'. As part of this rebuttal, I recommend amendments to refer to suspended fine sediment rather than visual clarity to align with the terminology used in Tables 8.4 and 9.2. I also recommend further amendments to clarify the intent of the note, removing reference to relevant catchments and focusing only on the TAS sites listed in Tables 8.4 and 9.2 and to revise the wording in the note to refer to the most recent monitoring 'report' (and reference to s35(2A of the RMA)) rather than 'record' to provide greater clarity to plan users. Amendments also include reference to any relevant downstream TAS (noting this only affects pFMUs upstream of the Hutt River (Boulcott) TAS site). In relation to the validity of regulating forestry activities upstream of the Hutt River (Boulcott) TAS site and the influence of other activities, I have addressed this in response to Mr Cairns and this is addressed in further detail by Dr Greer in his rebuttal evidence.

Point number	Summary of statement from China National Forestry Group (Hamish McGregor)	Response
	(Boulcott) TAS site when regular and repeated operations in the bed of the river for flood management purposes are occurring which lead to substantial sediment generation and prolonged periods of discharge due to resuspension after such operations.	
6.	Throughout pages 17-20, CFG provide their view on the merits of the NES-CF versus requiring a resource consent. In summary, CFG consider there is insufficient evidence to satisfy the stringency test and that better engagement between the sector and the regulator i.e. the chance to work in partnership to achieve better results can be largely achieved through active implementation of non-regulatory methods or failing that, if the commissioners decide otherwise, by setting a requirement for a controlled consent, applicable only for part FMU's where TASs were not being met, and with the council reserving control over matters over and above the relevant proposed schedules, that strictly address the gaps identified.	I provide my position on the stringency test and the need for a restricted discretionary activity status in my response to Mr Wyeth at Table 3 (Point 1) and (Point 3).

Table 8: Summary of planning evidence from New Zealand Transport Agency Waka Kotahi

Point number	Summary of evidence from New Zealand Transport Agency Waka Kotahi (Catherine Heppelthwaite)	Response
1.	In relation to the definition of vegetation clearance in the NRP and its implications for the vegetation clearance rules, Ms Heppelthwaite considers the definition of vegetation clearance is problematic and suggests while (c) appears to provide an exemption for some road activities, she considers all clauses have to be met as the "and" is conjunctive. Ms Heppelthwaite considers further changes to WH.R17 and P.R16 are necessary to give effect to the RPS definition and enable vegetation clearance for repair and maintenance of road networks and proposes adding the wording from clause (c) of the RPS Decisions Version to permitted activity rules WH.R17.	I do not agree with Ms Heppelthwaite's interpretation of the "and" as being conjunctive in the context of the definition of vegetation clearance in the Operative NRP which would apply to Rules WH.R17-WH.R19 and P.R16-P.R18. I consider it is clear the listed exclusions are separate activities/matters and that there is no requirement for all of the listed exclusions/matters to be met. I have discussed this with Council's consenting officers who have confirmed they would also interpret the clauses as standalone on the basis it is unlikely that there would be a situation where all of the exclusions in (a)-(c) would apply and that reading the 'and' as conjunctive in this context would not make sense in a planning context. On this basis, I consider no further amendments are required.

Table 9: Summary of planning evidence from New Zealand Carbon Forestry Group (Ainsley McLeod)

Point number	Summary of evidence from New Zealand Carbon Forestry Group (Ainsley McLeod)	Response
1.	Ms McLeod does not support the Section 42A Report recommendation to include a definition of 'commercial forestry' in PC1 or introduction of that	Upon further review of the submissions of NZCF and discussion with Council's Counsel, I agree with Ms McLeod to a point, and that some elements of exotic-continuous cover forestry were not within the scope of

Point number	Summary of evidence from New Zealand Carbon Forestry Group (Ainsley McLeod)	Response
	term in provisions in PC1. This is because recommended amendments will alter the scope of Rules WH.R20, P.R19 and Policies WH.P28 and P.P26 by making exotic continuous-cover forestry subject to these provisions when exotic continuous-cover forestry was not subject to these provisions in PC1 as notified. Ms McLeod's view is, that in the context of PC1, reference to commercial forestry, the NES-CF and the provisions therein are more significant than an update or word swap and materially change the scope and regulatory impact of PC1 in respect of exotic-continuous cover forestry and asserts that expanding the scope of PC1 to include carbon forestry may not be an available response.	PC1 as notified (i.e, they were not activities that were captured by PC1 as notified because the forestry provisions as notified only included plantation forestry). As notified PC1 did address vegetation clearance, which at the time captured disturbance, clearing, damaging and removing exotic-continuous cover forestry because vegetation clearance was defined as relating to any vegetation that was not plantation forestry and earthworks were also included in PC1. Low-intensity harvesting and harvesting for exotic continuous-cover forestry are not included in the note which explains which rules PC1 prevails over. I do agree with Ms McLeod that afforestation and replanting of exotic-continuous cover forests were not within scope of PC1 as notified. Accordingly, I recommend amendments to explanatory notes to provide direction that afforestation, and replanting for exotic continuous cover forestry is not covered by PC1 and is managed solely by the NES-CF. I do not consider any amendments are required to WH.P28 or P.P26 as 'commercial forestry' and 'commercial forestry activities' cover both exotic-continuous cover forestry and plantation forestry and for this reason the use of commercial forestry in the definition of forestry management plans remains appropriate. For the avoidance of doubt I have also recommended advice notes in rules WH.R20 and P.R19 to direct these rules do not regulate afforestation or replanting for exotic continuous-cover forest.
2.	Ms McLeod asserts it is incorrect to state that continuous cover forestry may be harvested in the future because, by definition, an exotic continuous-cover forest is a forest that will not be harvested.	While I acknowledge Ms McLeod's position the definition of exotic continuous-cover forest implies this forest type will not be harvested, I understand, although unlikely, this may not always be the case. While an exotic-continuous cover forest may be planted with the intent that it would

Point number	Summary of evidence from New Zealand Carbon Forestry Group (Ainsley McLeod)	Response
	Ms McLeod also considers the s42A report overstates the ability for an exotic continuous-cover forest to be permitted in all situations and locations and, in doing so, fails to give consideration to the constraints on the location of such forests in the NESCF, along with the standards in the NESCF that apply. Ms McLeod states there is no justification for PC1 taking an approach to exotic continuous-cover forestry that is more stringent than the NESCF. Of note, Ms McLeod notes the benefits of exotic continuous-cover forestry in terms of climate change response and erosion, sediment discharge and water quality have not been considered.	be 'permanent', changes to regulatory settings (such as the ETS) and a landowner's personal circumstances may lead to a decision a greater return can be obtained by other means and to harvest the forest. There is nothing to preclude this situation occurring and therefore there is no certainty that any exotic-continuous cover forest will not be harvested at some point in future. I clearly outline consideration of the benefits of permanent forestry in terms of sediment risks in my analysis of WH.P28 and P.P26 in my section 42A report. I note that, in the event that exotic continuous-cover forest is harvested (not low-intensity harvest), it could be expected to have similar effects to that of plantation forestry. Nevertheless, as noted above, I agree that afforestation (and replanting) of exotic continuous-cover forests, which I understand to be the main concerns of NZCF, are outside the scope of PC1 and will be managed solely by the NES-CF.
3.	Ms McLeod notes she considers Mr Greer's evidence supports the view expressed by NZCF (and others) in submissions that there is not sufficient justification for a more stringent rule to apply to forestry activities and associated discharges. Ms McLeod highlights that she considers Mr Reardon's evidence points to limitations of the NES-CF for managing harvesting and related activities rather than all forestry activities and suggests any more stringent provision should be targeted to	I address these points in my responses to Mr Wyeth at Table 3 (Point 1) and (Point 3).

Point number	Summary of evidence from New Zealand Carbon Forestry Group (Ainsley McLeod)	Response
	address those specific activities rather than all forestry activities.	
4.	Ms McLeod considers the section 42A report does not clearly make a distinction between the different types of commercial forestry, and the associated difference in potential adverse effects of different types of forestry and in her opinion the potential adverse effects of exotic continuous-cover forests differ significantly to production forests because there is no harvesting component. Ms McLeod considers PC1 should reflect the different forest types, and different potential adverse effects of those forest types by taking a more nuanced approach to the forests, and/or forestry activities, where more stringent rules may be required. Ms McLeod considers that it is counterintuitive to include provisions in the NRP that are more stringent than the NESCF for an activity that gives rise to lesser erosion and sediment loads when compared to other land use activities and the outcome sought by PC1 would be better supported by provisions that encourage continuous-cover forests.	Accepting that afforestation and replanting of exotic continuous-cover forest are outside of the scope of PC1 and that I support the amendments to Rules WH.R20 and P.R19 to focus on the sediment discharge for those activities which generate the most sediment (earthworks, vegetation clearance, harvesting, mechanical land preparation), as shown in recommended amendments in Appendix 2 of this rebuttal evidence, I address Ms McLeod's concerns about a more nuanced approach to forestry rules in response to Mr Wyeth at Table 3 (Point 3) above. I welcome the opportunity to work with Ms McLeod to refine the provisions as part of the hearing process. My recommended non-regulatory method M44A encourages exotic continuous-cover forests, however I agree that Policies WH.P28 and P.26 could also be more direct in their support of continuous-cover or permanent forests. I have therefore recommended these policies be amended to include a clause promoting and supporting both indigenous and exotic continuous-cover forests in Appendix 2 of this rebuttal evidence.

Point number	Summary of evidence from New Zealand Carbon Forestry Group (Ainsley McLeod)	Response
5.	Ms McLeod considers it is necessary and appropriate to confine Rules WH.R20 and P.R19 to those activities that have the potential in result in increased sediment load (as described in the relevant technical evidence) and seeks the deletion of 'afforestation' from the Rules.	I agree with Ms McLeod that Rules WH.R20 and P.R19 could be interpreted in a way which indicates that the rules are intending to manage the land use activity rather than the discharge of sediment, the latter of which is the intent of these rules. I support the amendments to reframe this rule suggested by Ms McLeod and adopt these in my recommended amendments in Appendix 2. I address my position on the need to regulate afforestation activities in response to Mr Wyeth at Table 3 (Point 3) above.
6.	Ms McLeod considers as a consequence of the amendments to Rules WH R.20 and P.R19 that it is also necessary to revise the explanatory note that accompanies the Rules and sets out where provisions prevail over the NESCF. Ms McLeod considers the explanatory note should be amended such that the only Regulation of the NES-CF that PC1 should prevail over is Regulation 97.	I have no concerns with this amendment in principle. However, in my opinion, it is more explicit to identify the specific regulations that rules in PC1 prevail over and this this would be clearer and more efficient for plan users.
7.	Ms McLeod does not support the definition of 'vegetation clearance' (commercial forestry) given reservations about the introduction of the term 'commercial forestry', and the consequences of the use of that term for exotic continuous-cover forestry. Ms McLeod seeks that the definition retain the cross-reference to the relevant provisions.	As outlined in my s42A report, in my opinion, vegetation clearance associated with exotic continuous-cover forests was within the scope of PC1 and therefore it is appropriate that vegetation clearance in the context of rules in PC1 (WH.R20 and P.R19) applies to both exotic continuous cover and plantation forestry activities. I have recommended amendments in the explanatory notes and rules which indicate which activities, insofar as they

Point number	Summary of evidence from New Zealand Carbon Forestry Group (Ainsley McLeod)	Response
		relate to exotic-continuous cover forest, continue to be managed by the NES-CF. I do not consider any further amendments are required.
8.	Ms McLeod generally supports recommended amendments to P.P26 and WH.P28 however expresses the policies are framed as direction for the subsequent management and considers that they add limited value in the consideration of any future application for resource consent (either under the NRP or the NESCF).	I agree with Ms McLeod and have recommended amendments to Policies WH.P28 and P.P26 to reframe the policies to provide better direction as to the matters for consideration for a resource consent application and to respond to other submitter evidence. Recommended amendments are shown in Appendix 2 of this rebuttal evidence.
9.	Ms McLeod supports recommended deletion of Schedule 34 however is not supportive of amendments to introduce Schedules 34A or 34B on the basis Mr Reardon's evidence only comments on the need for greater detail to understand harvest planning rather than impacts for afforestation or earthworks. Because proposed Schedules 34A and 34B relate to afforestation and earthworks, but she considers Mr Reardon's evidence is specific to harvesting, Ms McLeod considers there is no clear rationale for departing from the requirements of the NESCF in respect of these activities. Ms McLeod considers it is more efficient and effective to delete the text in the Schedules and instead incorporate the NESCF Schedules by reference (if necessary to do	In my opinion, the additional level of detail required in regard to contour mapping is both necessary and appropriate based on the evidence of Mr Reardon, noting that Mr Reardon's evidence refers to an absence of detailed information to understand risk for both harvesting *and* earthworks (so previous Schedule 34B related to forestry earthworks would be relevant). Nevertheless, in response to submitter evidence, I have recommended amendments which delete Schedules 34A-C, with the information requirements now covered in the forestry management plans definition (noting this now includes additional information requirements in response to submitter evidence - refer to my response to Mr Wyeth in Table 3). In my opinion, this is consistent with the relief sought by Ms McLeod related to the schedules.

Point number	Summary of evidence from New Zealand Carbon Forestry Group (Ainsley McLeod)	Response
	so) on the basis she does not support the recommended change to contour mapping.	

Table 10: Summary of legal submissions from Environmental Defence Society and Forest and Bird

Point number	Summary of Legal Submissions from Environmental Defence Society (John Commissaris) and Forest and Bird (May Downing)[4]	Response
1.	EDS outline that limitations of the erosion risk mapping have been overstated. While EDS agrees that the mapping does have some limitations and that further work needs to be undertaken to more "fulsomely" understand the influence and impacts of commercial forestry, EDS does not agree that the use of high erosion risk maps to support land use management should be sidelined completely. EDS submits that Council is obligated to use the best available information and EDS submits that, on balance, the erosion risk maps provide the best information currently available on erosion risk in the two Whaitua. EDS notes this has been recognised in the recommendations for rural land-use, which uses	Following review of submitter evidence, review of the rebuttal evidence of Mr Blyth and Mr Nation and further discussion with Mr Nation and Mr Blyth as part of the rebuttal process, while the mapping was prepared independently of it, I understand that the PC1 erosion risk mapping better aligns with the definition of highly erodible land in RPS Change 1[5] than I had previously understood and should be considered the best available information. Accordingly, I agree it should not be sidelined completely. Based on the mapping limitations and the advice of Mr Blyth that the erosion risk mapping is more suitable for guiding where site-specific evaluation of erosion risk is required (ground-truthing), I remain of the opinion that the mapping is not suitable for use as a consenting trigger for rules or as a trigger for requiring a higher activity status.

[4] Forest and Bird adopt the legal submissions from EDS in relation to commercial forestry and vegetation clearance

[5] On the basis definition aligns with the Highly Erodible Land Mapping Update (Dymond et al. 2023) notwithstanding the coarseness or accuracy given it is a national model mapped at 1:50,000 scale

Point number	Summary of Legal Submissions from Environmental Defence Society (John Commissaris) and Forest and Bird (May Downing)[4]	Response
	the updated 'potential' high erosion risk map to inform land-use management. A similar approach could be adopted for commercial forestry.	On this basis I have recommended amendments to the definition of potential erosion risk land to include land which meets the RPS definition of highly erodible land and to the forestry management plan definition to require applicants to identify any potential erosion risk land, confirm a property scale review of the erosion risk of potential erosion risk land has been undertaken and to document the specific management strategies or practices that will result in impacts from sediment being no greater than that expected on land not identified as being at potential risk of erosion. I have also recommended amendments to Policy WH.P28 and P.P26 to direct Council to have regard to the need for specific resource consent conditions to manage erosion and sediment risk on land which meets the definition of potential erosion risk land. In my opinion these recommended amendments are consistent with those sought by EDS.
2.	To ensure TASs for visual clarity are maintained, EDS considers Council needs to retain some discretion to manage commercial forestry activities and submits a restricted discretionary rule would be appropriate to manage commercial forestry where TASs for visual clarity are being met. As recommended, the policies that guide implementation of the restricted discretionary rule require sediment from commercial forestry to be 'minimised'. Minimise in the NRP means "Reduce to	Where SFS TAS are being met, implementation of recommended amendments, such as Methods 44A and 44B which apply to all forestry activities, are expected to result in reductions to sediment loads entering freshwater and consequently these TAS being maintained. In my opinion, the NES-CF is a limit on land use for the purposes of the NPS-FM and improved monitoring and implementation of the NES-CF, as required by recommended non-regulatory methods, will be sufficient to maintain SFS TAS. In my opinion, the NPS-FM does not require additional regulation where target attribute states are being met and this plan change is about achieving TAS and the NPS-FM; it is not a plan change to address

Point number	Summary of Legal Submissions from Environmental Defence Society (John Commissaris) and Forest and Bird (May Downing)[4]	Response
	the smallest amount reasonably practicable." EDS submits that, in high risk areas, effects need to be 'managed' rather than 'minimised'. On highest erosion risk land, minimisation of effects will not be sufficient to adequately contribute to the achievement of TASs for visual clarity. EDS submits that the policy and rule framework recommended to manage commercial forestry in part FMUs where TASs for visual clarity are not met, needs amendment. Specifically, on highest erosion risk land, management (including avoidance) of effects rather than minimisation would be more aligned with Policy CC.6 of RPS Change 1, would appropriately utilise the best available information in a way that best gives effect to the NPS-FM, and is necessary to recognise Council's obligations under s 107. EDS considers management should include avoidance directives where the RPS Change 1 'Highly erodible land' definition is met and, as per EDS's original submission, direction should be provided that requires setbacks, alternative harvesting	limitations of the NES-CF where those limitations are not resulting in objectives not being met. I have recommended amendments to WH.P28 and P.P26 to include direction related to the management of afforestation and replanting on potential erosion risk land (which includes land which meets the definition of highly erodible land in RPS Change 1). This includes direction as to Council needing to have regard to whether restrictions on afforestation, and restrictions or prevention of replanting are required based on the suitability of the location or the effects of sediment impacts recorded during previous earthworks or harvest. This direction, in my opinion, provides Council with the ability to manage activities on highly erodible land and potential erosion risk land in a manner that would be consistent with Policy CC.6 of the proposed RPS. However, in addition to concerns about limitations of the mapping for use in rules, I consider it is premature for rules which give effect to avoidance direction (which would require either non-complying or prohibited activity status) given the current appeal on CC.6[6], and that Method CC.4 of RPS Change 1, which requires Council to work with mana whenua and key stakeholders (which I consider includes the forestry sector), to identify where, amongst other matters, plantation forestry would be considered inappropriate[7], has not been progressed. No evidence on what any specific setback distances, alternative harvesting methods or spatial temporal harvest limits might need to be in the context

[6] Policy CC.6 of the RPS is under appeal and therefore whether or not this policy is necessary to give effect to the NPS-FM has not been confirmed
[7] Clause (e) of Method CC.4 of RPS Change 1

Point number	Summary of Legal Submissions from Environmental Defence Society (John Commissaris) and Forest and Bird (May Downing)[4]	Response
	methods where the erosion risk requires it, and spatial/temporal harvesting limits.	of these Whaitua has been provided. I therefore make no further recommendations on this point.
3.	EDS does not support the recommended replacement of Schedule 34 with Schedules 34A, 34B and 34C. EDS submits that the type of detail required in Schedules 34A, 34B and 34C will be less effective than Schedule 34 as notified in achieving freshwater outcomes and statutory requirements including because: (a) They do not require the consent applicant to demonstrate how discharge standards will be met in accordance with s 107; (b) They do not require the consent applicant to demonstrate that the risk of sediment discharge will not increase on high risk land; (c) They do not provide for the progressive reduction and cessation of commercial forestry on high erosion land nor provide for restoration and revegetation with appropriate permanent woody species;	I have recommended amendments to the forestry management plan framework/definition to respond to some of the concerns of EDS in Appendix 2 of this rebuttal evidence. Namely, I have recommended amendments requiring applicants to identify any sites in Schedules B, C, F1 and F3 of the NRP and to identify potential erosion risk land, confirm the erosion risk of potential erosion risk land through an on-site assessment, and a requirement to describe how erosion and sediment management will be undertaken on potential erosion risk land such that the risks of sediment in these areas will be no greater than that expected on land not identified as potential erosion risk land. I note that in relation to (e), the NES-CF Schedules require details of the location of proposed forestry operations and the location of all forestry infrastructure[8] (both proposed and existing) to be identified. These requirements carry through into PC1 (through the forestry management plans definition) and I consider this provides enough information about the location of existing or previous forestry operations.

[8] means structures and facilities that are required for the operation of the forest, including forestry roads, forestry tracks, river crossings, landings, fire breaks, stormwater and sediment control structures, and water run-off controls

Point number	Summary of Legal Submissions from Environmental Defence Society (John Commissaris) and Forest and Bird (May Downing)[4]	Response
	(d) They do not require details on the location of any site or river included in the Schedules B, C, F1 and F3 of the NRP that is within, or adjacent to, the plantation forestry; and (e) They do not require details on the location of the existing and proposed plantation forestry operations. EDS considers this type of information is unlikely to be difficult to provide and foresters should be providing much of this information anyway in accordance with good management practice and to support achievement of consent conditions but, in many cases, they do not. As such, EDS submits that requiring the provision of this information will not significantly increase costs but it will increase efficiency and effectiveness in achieving freshwater outcomes.	
4.	EDS acknowledges the risks of certain unintended outcomes arising but submits Council needs to address these through the NRP management framework rather than using them to justify inaction. For example: (a) The risk of vegetation clearance causing long term increases in sediment loss through the	I have recommended amendments which are consistent with the outcomes sought by EDS in Appendix 2 of this rebuttal evidence. In particular, I have recommended amendments to WH.P28 and P.P26 which require Council to set consent conditions having regard to the suitability of afforestation or replanting on potential erosion risk land or where significant adverse effects on water quality were identified during any previous earthworks or harvest activity to support Policy CC.6 of RPS

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	facilitation of a land use change can be appropriately managed through other policies and rules in PC1. For instance, as proposed, the required Plantation Forestry and Sediment Management Plan requires highest erosion risk land to be restored and revegetated with appropriate permanent woody species. (b) While preventing forest harvest beyond the current harvest cycle may conceivably lead to perverse outcomes because forest owners may not have the economic incentive to maintain or enhance land subject to forestry activity, this could be addressed, for example, by including policy direction to avoid replanting where the harvest of the existing block results in adverse effects. This would act as a strong incentive for landowners to adopt and actually implement best practice to give themselves the best chance of being able to renew their consents.	Change 1. In situations that warrant it, such conditions could include a prohibition or prevention on replanting after the harvest phase or only allow afforestation or replanting of specific species or in specific locations, if significant adverse effects are expected or have occurred previously.
5.	EDS generally supports recommendations for new methods M44 and M45. However, EDS is concerned that the development of standard conditions of consent may preclude site specific adjustments that	I do not consider the development of standard conditions of consent alongside the forestry sector would preclude any site-specific adjustments that may be required. However, to reduce any ambiguity, I have recommended amendments to Policies WH.P28 and P.P26 to provide

Point number	Summary of Legal Submissions from Environmental Defence Society (John Commissaris) and Forest and Bird (May Downing)[4]	Response
	will be needed on higher erosion risk land; for example, the use of alternative, low-intensity harvesting methods or additional setbacks suggested	clearer direction regarding the matters Council should have regard to when setting consent conditions for forestry activities (both when the NES-CF standards cannot be met and under PC1). In my opinion, this provides direction for both Council and applicants as to the situations where more specific conditions may be required.
6.	EDS generally accepts the evidence and recommendations relating to vegetation clearance presented in the s 42A Report. However, this is subject to some additional tweaks that would better support the achievement of freshwater objectives. In relation to permitted activity rules, EDS supports amendments that introduce setbacks and require consideration of effects on the coastal marine area. To better align with the new restricted discretionary rules proposed, EDS submits that activities should not be permitted in the coastal marine area and should have a setback of at least 10m from surface water bodies. EDS submits the standards in (a)(i)-(iii) must also apply to (b) and (c), as required by s 107 of the RMA and the NPS-FM.	I support the requested amendments for the s107 tests in Rules WH.R17 and P.R16 to apply to the activities in (a), (b) and (c) and have adopted them in my recommended amendments in Appendix 2 of this rebuttal evidence. I do not consider amendments to require a 10m setback are necessary as there is no evidence to suggest that the current 5m setback is not appropriate for protecting water quality for vegetation clearance activities, and the 5m setback aligns with setbacks in other rules in both PC1 and the NRP (e.g. earthworks)[9]. I do not consider amendments requiring activities to be undertaken outside the CMA to be appropriate as this would expand the scope of the rules from those notified (and the existing NRP) and the main focus of the plan change is freshwater not coastal water quality.

[9] I note Forest & Bird requested 10m setbacks for permitted activity earthworks rules (WH.R23 and P.R22) in their legal submissions on the earthworks topic. Ms Vivian is recommending the 5m setback be retained in her rebuttal evidence.

DATE: 16 May 2025

SHANNON JOHN WATSON

TECHNICAL LEAD PLANNING GHD

APPENDIX 1:

APPENDIX 2

APPENDIX 3