



Wednesday, 13 December 2023

Environmental Policy
Greater Wellington Regional Council
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Attention: Hearings Adviser

By email to regionalplan@gw.govt.nz

SUBMISSION ON “Plan Change 1 to the Natural Resources Plan”

Submitter: Alan Bell
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Bio: I am a forestry consultant based in Lower Hutt and a registered member of the NZ Institute of Forestry and on the MPI Registered Forest Advisers list. I have been working in the NZ forest industry since 1977 and have been consulting since 1990.

I have read the NZ Farm Forestry Association, Wellington (NZFFAW) submission. This submission is of very high quality and explains many points that counter and question the background to the proposed changes around plantation forestry on steep “highest and high risk erosion prone” slopes. I whole heartedly agree with the NZFFAW submission and recommend that GWRC take notice of the information presented in the NZFFAW submission.

For my own submission I am unable to provide the same quality of background information but certainly wish to have my say on several issues that are proposed in Plan Change 1 (the Plan).

Schedule 34.

Under the proposed Plantation Forestry Erosion and Sediment Management Plan there are a number of actions that will be detrimental to forestry operations without necessarily increasing the quality of freshwater.

Firstly the mapping of the highest erosion risk land (HERL) as presented in Map 95, for example, would result in an impractical spacial arrangement of forest areas that would effectively render the forest unworkable (see Figure 1 below).

There is a proposal that HERL areas be restored and revegetated with “appropriate permanent woody species”.

There is no suggestion of compensation for loss of productive land or loss of economies of scale for the remainder of the forest. Who will pay for the planting of the appropriate permanent woody species?

Forest owners invest heavily in roads and skids in the first rotation and strive to create environmentally friendly and sustainable outcomes, at a very high cost. This is not only for the current rotation but also for future rotations. However, if they

know there is no further rotation allowed then the quality of roading is likely to reduce and this would have poorer environmental outcomes.

The whole idea of changing species has not been thought through properly by GWRC. Some owners will have Post 1989 forests that are registered in the ETS and they will be compelled under the ETS to replant in the same species in order to avoid fees around NZU sequestration. Who will pay for the surrender of NZU's on land that is not allowed to be replanted in plantation species?

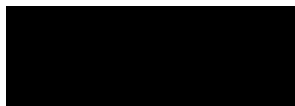
Schedule 34 refers to loss of sediment from land "in a natural state". What is this? At what point was the land in a "natural" state?

Schedule 34 proposes that Plantation Forestry Erosion and Sediment Management Plans must be completed by a Registered Forestry Adviser (RFA). I have been a registered forestry consultant for over 30 years but my experience is such that I do not have the specific knowledge of engineering and environmental requirements associated with harvest roading and skid formation. My point here is that not all RFA's are the same. The RFA who would complete such a plan would need to have demonstrated knowledge and experience in order for their plan to be workable and successful in minimising sediment loss. It is not as simple as picking just any RFA.

General.

The increase in planning and paperwork that is proposed under the GWRC plan may lead to forest owners seeking a quick way out by harvesting with minimal investment in view of them not being able to continue with another rotation. Significant areas of productive land will be lost to the economy when land is already scarce. It would be better for GWRC to make sure the forest owners do a good job of their roading on all types of land and then both parties win. The forest owner gets to utilise their investment in land and infrastructure and water quality is maintained because there is an ongoing interest in the land.

Yours faithfully,

A solid black rectangular box used to redact the signature of Alan C Bell.

Alan C Bell
Registered Forestry Consultant (FNZIF)

Example of areas deemed to be Highest Erosion Risk Land amongst an existing plantation.

