

Proposed Natural Resources Plan:

Submitter:

PF Olsen Limited

Submitter Number:

S131

Submission on the Proposed Natural Resources Plan for the Wellington Region

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:



Send to: regionalplan@gw.govt.nz

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Trade competition

Yes /we could not gain an advantage in trade competition through this submission

No /we could gain an advantage in trade competition through this submission.

If you could gain an advantage please complete one of the following:

No /we are directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Yes /we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Attendance and wish to be heard at hearing(s)

Yes /we do wish to be heard in support of my/your submission

[Note: this means that you wish to speak in support of your submission at the hearing(s).]

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No I/we do not wish to be heard in support of my/our submission

[Note: this means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]

Yes If other make a similar submission, I will consider presenting a joint case with them at a hearing.

Date: 25/09/2015

Interpretation

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Amend

Proposed change is one size fits all approach where we believe erosion prone land is better described under current regional soil plan taking underlying strata (rock, soil, slope erosion susceptibility and vegetation) into account.

Definition and rules around erosion prone land for forestry should remain constant with current soil plan for: "any land within Area 1 with a slope of greater than 23 degrees; and any land within Area 2 with a slope of greater than 28 degrees".

Erosion prone land

Policies

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Policy P7: Uses of land and water			
	Amend		Forestry as a land use has not been considered to add cultural, social or economic benefit to the region despite delivering a wide range of benefits including improving water quality, erosion control, carbon sequestration and employment.
			Forestry should be included as a beneficial use of land and water resources

Rules - Discharges to water

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Rule R42: Minor discharges – permitted activity	Amend	
		Low tolerance for suspended solids that will be hard to measure.
		Remove 1.50g/m ³ and ii. 100g/m ³ tolerances and concentrate on zone of reasonable mixing

Rules - Land use	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Rule R99: Earthworks— permitted activity	Amend	The new rule states up 3,000m ² per property per 12 month period can be disturbed. Currently this is 1,000 m ³ of soil within any 10,000 m ² per 12 month period.	Differentiate and maintain current plan rules for forestry harvesting related earthworks or align with NES-PF rule for earthworks with provision for an erosion and sediment control plan on erosion prone land and available to the council on request.
Rule R100: Vegetation clearance on erosion prone land – permitted activity	Amend	Capacity for aerial desiccation spraying for forest establishment (temporary vegetation clearance) on erosion or non-erosion prone land is not covered as part of this plan.	Add variation to plantation forestry rules to include desiccation spraying as permitted activity.
Rule R101: Earthworks and vegetation clearance – discretionary activity	Amend	Rule 100 is only for vegetation clearance that is on erosion prone land and rule 101 says that "vegetation clearance that is not permitted by Rule 99 or R100 is a discretionary activity" We would like to know what the rules are around vegetation clearance on non-erosion prone land. The way this could be perceived is that vegetation clearance occurring on non erosion prone land will require consent.	Vegetation clearance on non-erosion prone land needs to be outlined as a permitted activity.
Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Amend	Similar to above, forestry harvesting activities are permitted on erosion prone land provided when listed conditions are met. What are the proposed conditions on harvesting activities on non-erosion prone land?	Propose two sets of rules, one for harvesting on erosion prone land and one for harvesting on non-erosion prone land.
Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Amend	Clause C: States "slash is removed from a surface water body where it is blocking river flow or diverting river flow causing bank erosion". Currently under the rules of beds of rivers and lakes there is no provision for any operations to produce any of these harvesting residues. Therefore cable harvesting across rivers should therefore become a permitted activity in the bed of rivers and streams under the same conditions as rule 102.	See Rule 5.5 Submission.
Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Amend	Clause B: States "Disturbed vegetation or soil is not placed where it can dam or divert a surface water body"	We would like to insert "is not deliberately placed" instead of "is not placed"

Rules - Wetlands and beds of lakes and rivers

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise detail(s)):

<p>Beds of lakes and rivers general conditions</p>	<p>Currently there is no provision for extracting logs over (not through) beds of rivers during harvest despite Rule 102, clause B or C "slash is removed from a surface water body where it is blocking river flow or diverting river flow causing bank erosion". This seems contradictory as slash would otherwise not accumulate in the river.</p>
<p>Rule R122: Removing vegetation – permitted activity</p>	<p>Not practical for forest harvest operations to adhere to these conditions without encouraging adverse environmental impacts through through large qualities of timber falling into riparian areas as a result of changes to the structural integrity of surrounding forest. These areas then become a health and safety risk to manage.</p>
<p></p>	<p>We want to exclude plantation forestry from Rule 122, subsection k.</p>
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