Proposed Natural Resources Plan:

Submitter:

PF Olsen Limited

Submitter Number:

S131

Email address:

Submission on the Proposed Natural Resources Plan for the Wellington Region

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

Your details:

Full name:

Send to:

regionalplan@gw.govt.nz

INSTRUCTIONS

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Trade competition

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

Z 0 I/we could gain an advantage in trade competition through this submission.

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

<u>Z</u> I/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 I/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 I/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).]

any decision made by the Wellington Regional Council to the Environment Court.] If other make a similar submission, I will consider presenting a joint case with them at a hearing. [Note: this means that you cannot speak at the hearing. However, you will still retain your right to appeal I/we do not wish to be heard in support of my/our submission

No

Yes

25/09/2015

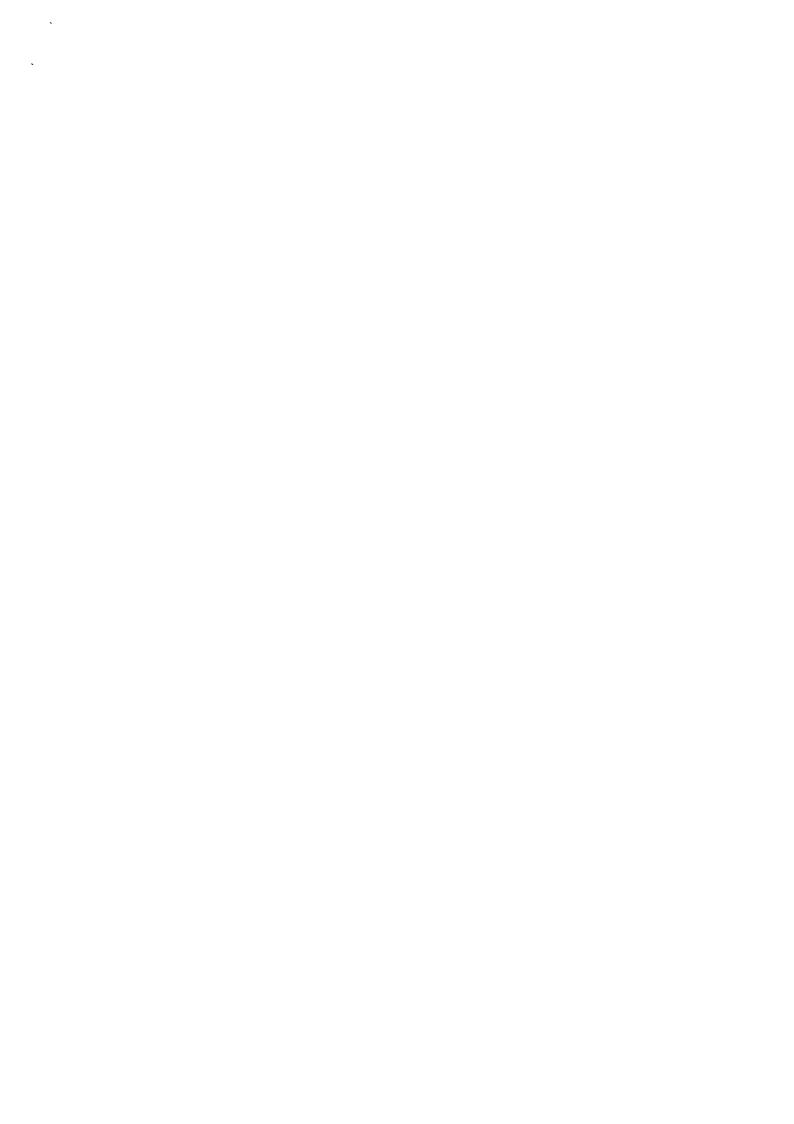
Date:

Erosion prone land						
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Amend						
Proposed change is one size fits all approach where we beliew erosion prone land is better described under current regional soil plan taking underlying strata (rock, soil, slope erosion susceptibility and vegetation) into account.						
its all approach where we believe Definition and rules around erosion prone land for forestry described under current regional should remain constant with current soil plan for: "any land rata (rock, soil, slope erosion within Area 1 with a slope of greater than 23 degrees; and a land within Area 2 with a slope of greater than 28 degrees)						

Interpretation

My submission on this provision is:

Reasons for my submission:



Policy P7: Uses of land and water						uu uu ka
Amend			and the end of the end			
Forestry as a land use has not social or economic benefit to the wide range of benefits including erosion control, carbon seque	en de la composition della com	E- STANDARD PARTIES PARTIES PARTIES AND	december of the control of the contr	Sant vand virredenissimustasid	Recessaria suncernatura estratur	
Forestry as a land use has not been considered to add cultural, Forestry should be included as a beneficial use of land and social or economic benefit to the region despite delivering a water resources wide range of benefits including improving water quality, erosion control, carbon sequestration and employment.						

Policies

My submission on this provision is:

Reasons for my submission:



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Amend						mantiktoria variakinin kaikantika kantika kantiktoria kantiktoria kantikan kantiktoria.	kanda kenda kanda ka	eller ver verstende konstruktionen der verstende verstende kan der verstende der verstende der verstende konst				
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Rules - Discharges to water

My submission on this provision is:

Reasons for my submission:



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My submission on this provision is:

Reasons for my submission:

Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Rule R101: Earthworks and vegetation clearance – discretionary activity	Rule R100: Vegetation clearance on erosion prone land — permitted activity	Rule R99: Earthworks– permitted activity
ts at this order to the control of t	Amend	Amend	Amend	Amend	Amend
Clause B: States "Disturbed vegetation or soil is not placed where it can dam or divert a surface water body"	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.	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?	Rule 100 is only for vegetation clearance that is on erosion Pegetation clearance on non-erosion prone land and rule 101 says that "vegetation clearance that is outlined as a permitted activity." 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.	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.	The new rule states up 3,000m2 per property per 12 month period can be disturbed. Currently this is 1,000 m3 of soil within any 10,000 m2 per 12 month period.
We would like to insert "is not deliberately placed" instead of "is not placed"	See Rule 5.5 Submission. 3 of	Propose two sets of rules, one for harvesting on erosion prone land and one for harvesting on non-erosion prone land.	Vegetation clearance on non-erosion prone land needs to be is outlined as a permitted activity.	Add variation to plantation forestry rules to include desiccation spraying as permitted activity.	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.

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Beds of lakes and rivers general conditions	Not stated	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.	We recommended that extracting logs via cable hauling across streams/rivers including associated stream bed disturbance is a permitted activity on the provision all conditions under Rule 102 are met.
Rule R122: Removing vegetation – permitted activity	Not stated	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.	We want to exclude plantation forestry from Rule 122, subsection K.
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Rules - Wetlands and beds of lakes and

My submission on this provision is:

Reasons for my submission:

