SUBMISSION ON PROPOSED PLAN

Clause 6, First Schedule of the Resource Management Act 1991

To: Environment Southland
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Submitter: RAYONIER NEW ZEALAND LIMITED
C/- Adderley Head,
PO Box 16, Christchurch 8140
Attention: Chris Fowler
Email: chris.fowler@adderleyhead.co.nz

Proposal: Water and Land 2020 and beyond
SUBMISSION ON PROPOSED PLAN

Name of submitter

1 Submitter name: Rayonier New Zealand Limited (the submitter)

2 Agent acting on behalf of Submitter: Chris Fowler c/o: Steve Chandler

3 Address for service: Chris Fowler
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Trade competition

4 The submitter cannot gain an advantage in trade competition through this submission

Hearing

5 The submitter does wish to be heard in support of this submission.

Specific provision

6 In general, this submission is in support of the notified version of the proposed Water and Land Plan (pWALP).

7 The specific provision that this submission relates to Rule 15 – Discharge of Storm water and Rule 25 – Cultivation on sloping ground.

Decision sought

8 The submitter seeks that the wording of the rules in the pWALP is retained as proposed, subject to the amendments requested below.

9 The submitter supports proposed Rule 15 and seeks the following:

   (a) Clarification by way of advice note or redrafting, that the reference to roads and parking areas within Rule 15 applies to storm water run-off within plantation forests, and to any diffuse discharges arising from earthworks associated with the construction of forestry roads, and from the grading or cleaning of water tables on forestry roads; and

   (b) Clarification by way of advice note or redrafting within Rule 15 that it applies to diffuse discharges during and following the harvesting of plantation forest; and
(c) Addition of a permitted activity condition that relates to the engineering standards for culverting in rural roads and tracks.

10 The submitter supports proposed Rule 25 and seeks the following:

(a) Amendment to the definition of ‘cultivation’ to explicitly exclude post-harvest slash raking.

Detail of submission

Clarification to include construction and operation of forestry roads and harvesting areas

11 The submitter is committed to ensuring good management practices and sustainable forestry practices are employed during their forestry operations, to ensure that the impact of forestry operations on water ecosystems is minimised. The submitter in general supports the objective of the WALP, however, seeks clarification to ensure that good practice forestry operations can continue to occur as a permitted activity.

12 The submitter generally supports the proposed wording of Rule 15 as it allows as a permitted activity storm water runoff from roads and parking areas (condition (v)). The submitter seeks clarification that this condition will apply to farm and forestry roads and tracks.

13 The submitter would like clarification that rule 15 will also apply to storm water runoff during and immediately after the harvesting of areas of plantation forest. Condition (iv) of Rule 15 provides that discharges cannot cause flooding or erosion but it is not explicit that condition (iv) provides for diffuse discharges of storm water from harvested plantation forest areas.

Inclusion of reference to engineering standards

14 The submitter notes that the freshwater objectives in Appendix E relating to visual clarity of water, are very stringent. The submitter considers these objectives can only be achieved when road drainage systems are constructed with a sufficient number of adequately sized culverts and are maintained to good practice standards. The submitter suggests that reference to engineering standards for rural roads and tracks, such as the NZ Forest Owners Engineering Manual should be included as a permitted activity condition within rule 15.

Clarification of ‘cultivation on sloping ground’

15 The submitter asks for further clarification on the definition of cultivation, to preclude post-harvest slash raking from being captured by rule 25. Although post-harvest slash raking does involve the disturbance of the soil surface the activities are not the same as general ‘cultivation’ type activities. The primary purpose of slash raking is to clear with minimal soil
disturbance post-harvest woody material. The raking still retains the slash on site which performs the function of sediment control.

Thank you for the opportunity to submit on the pWALP.

Dated 1 August 2016

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Chris Fowler - Counsel for and on behalf of Rayonier New Zealand Limited

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