

Proposed Marlborough Environment Plan

Hearing Notes

22 May 2018

Block 6 – Topic 15

Transportation

Presentation from:

Kenepuru and Central Sounds Residents' Association

Presentation to MEP Hearing Panel re Topic 15

Introduction

1. On behalf of the Kenepuru and Central Sounds Residents' Association (KCSRA - Association) I would like to thank the hearing panel for the opportunity to talk to aspects of our submissions on the Proposed Marlborough Environment Plan (MEP) as it concerns the above Topic.
2. My name is Andrew Caddie and I am the President of KCSRA. I have been a member of KCSRA for over 20 years and a committee member for around eight.
3. In terms of my professional background I hold 2 tertiary qualifications - a Bachelor of Forestry Science and a LLB, both from Canterbury University. I was a forester for a number of years with the then NZ Forest Service and subsequently with a well-known national forestry consultancy. Following a period of OE I obtained my LLB and practised law as a commercial solicitor for a number of years at various large National legal firms.
4. Today's session of hearings covers Topic 15 of Block 6 –**Transportation**. Since the Association's incorporation in 1991 the condition of the road network into and out of the Kenepuru has been a matter of ongoing interest. The presence of logging trucks on the road network has attracted strong comment for a number of years. In 2014 the then committee was forced to focus on this issue as concerned members reacted adversely to reports that their expectations as to certain commercial plantations being required to barge logs out as a condition of establishment might not in fact be the case.
5. I note the Chair's earlier assurances that panel members will have read the Association's original submission. Two points:
6. From your reading you will recall that the Association's primary focus is the Coastal Marine Zone of the Marlborough Sounds. Secondly today we wish to focus on matters arising from the RMA Section 42A report the Council has had prepared on this topic. In this case the Section 42A report prepared by Mr Paul Whyte, Consultant Planner.

Background

7. KCSRA addressed this topic in the context of our targeted and extensive submission on issues arising from the presence of commercial forestry operations in the Coastal Marine Zone of the Sounds. In the course of that submission we specifically submitted (briefly) on aspects of Chapter 17 of Volume 1 being the MEP chapter dealing with a variety of transportation modes and related issues.
8. In general terms the Association supported the thrust of Chapter 17 but were concerned that, in the Association's view, it failed to adequately recognise and address from a

policy perspective the adverse impacts of heavy and significant volumes of specialised traffic on a roading network not designed to cater for such traffic – large numbers of logging trucks and trailers. Nor might I add a roading network that necessarily lends itself to being brought up to specification – both technically and in terms of cost.

9. We explained in our submission how the Association had come to take a keen and close interest in this consequential impact on the community from commercial forestry afforestation. We explained how we had worked with the Council in terms of carrying out some belated planning assessment of the problem in the Kenepuru. A potential solution to reducing the number of logging trucks on a road network not designed to take this traffic – a new barge site – is still being worked on.
10. In essence we acknowledged that Issue 17 D started off well with its reference to the potential for adverse impacts of land use on the sustainable use of the land transport system. However we were disappointed and concerned that the express policies in our view failed to squarely address the elephant in the Sounds roading network. We made suggestions as to how that concern might be addressed.
11. However the section 42A reporter was of the view that the general wording of the relevant policies were applicable enough to apply to this activity and no change was needed.
12. We appreciate that the MEP could be around for another 20 years and policies may need to be generic in nature in order to catch new activities or current activities that in the future may grow in unexpected directions and so on. However the Association would also hope that the MEP policies recognises existing issues and deals with them. At this point in time we believe that here the MEP does not do the job as well as it might.

Structure of this Submission

13. In the time available the Association would like to refresh the Panel with the scale of the problem, that it is a problem that has been brought to the attention of MDC clearly and consistently, why the current proposed policies under Issue 17 D do not do the job and then propose how this particular issue might be more specifically addressed.

The Facts

14. In our further evidence on this topic we attached an extract from a MDC Technical paper reviewing another adverse impact from commercial forestry activities on the Sounds – sedimentation. Nevertheless it contains some useful area figures and an

overview map of the location of production forestry plantations in the Sounds which we thought might be useful in terms of context.

15. *[Put up page 3 from the MDC technical paper on the Screen and note salient points].*
16. We also attached as further evidence an extract from a 2016 report to Council setting out the case for the establishment of a barge site on the northern side of the Kenepuru Sound.
17. We thought this might be useful in demonstrating to the Panel that if a use is established without appropriate policy recognition of future consequential cumulative adverse effects then the degree of effort, time and application required firstly by the affected community and then the Council to begin to even address the issue as it comes to fruition is very significant. I also note that the recommendation the subject of this paper was approved by Council but the project is still very much a work in progress.
18. The Association's focus is very much on the existing problem in the Sounds, but we also note the recent governments intense policy interest in getting more new trees into the ground. This is already supported by a generous establishment grant scheme, so the chances are the problem will not get smaller.
19. With this background it also seems useful to consider the section 32 report on this topic.
20. This records that the MDC back in 2006 and 2007 carried out various consultation exercises concerning an integrated approach to transportation issues/needs.
21. The first exercise highlighted the adverse impacts of logging trucks on the Port Underwood and Kenepuru areas. In 2007 MDC developed more targeted discussion papers. One on the Future of the Marlborough Sounds. This paper looked at/sought comments on the impacts of forestry on the road network. The section 32 report records that this consultation revealed that forestry impacts was an issue of significance. I include an extract noting feedback from that report by way of example.
22. *The feedback noted that the narrow carriageways, limited sightlines, steep inclines, tight corners, limited run-out, basic road surface and the size of logging transport vehicles create the potential for opposing-traffic conflict and accidents. There were several suggestions for ways of improving the safety of roads utilised by logging trucks, focusing on the timing of movement, the use of convoys and signage” - And - “There was strong support for barging logs in preference to using logging trucks” (See pages 10 and 11 of the Section 32 Report).*
23. Turning to Chapter 17 itself we see the express reference to the issue – condensed – at page 17 -8.
24. *However in the Marlborough Sounds there are well established marine farming and forestry industries that have flow on effects for the Sounds road network, especially*

when harvested produce is transported to processing facilities on narrow and windy roads for example from Port Underwood to Picton.

25. When the Association subsequently revisited Issue 17D and its resultant policy Objective in light of the section 42A report we noted its reference to “*minimise conflicts from uses in terms of the impact on the land transport network*” and our hopes did rise. Until we re-examined the various following policies bearing in mind the section 42A reporters view that they would adequately address the issue we raised.
26. In brief when reading the associated policies it seems hard, to the Association at least, to identify the elephant in the room - an existing use called commercial production forestry. A number of the policies do not seem relevant to the issue on the table eg 17.4.2, 17.4.4, 17.4.5, 17.4.6, 17.4.7, 17.4.8.
27. What about 17.4.1? or 17.4.3? Again the focus seems to be on future use.
28. Accordingly we submit that a short policy that identifies the issue and puts some general words around it to assist those tasked with regulating the activity would assist future regulators and be of immense practical benefit to the community.
29. Such a specific, but general policy, might be worded as follows.
30. “*When reviewing, through the resource consent process, commercial forestry activities (such as establishment or harvesting) in the Marlborough Sounds consideration will be given to avoid, remedy, or mitigate cumulative adverse impacts on the Sounds land transport network*”.

Andrew Caddie

For and on behalf of KCSRA

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