



23 April 2021

Gisborne District Council  
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### **Submission: Our Tairawhiti 2021 - 2031 Long Term Plan**

Kia ora koutou

The Eastland Wood Council (EWC) is an incorporated society which provides a collective voice for the forestry industry in Tairawhiti, for the benefit of Tairawhiti.

The Eastland Wood Council would like to speak to the hearing panel regarding this submission.

#### **Our Philosophy**

Forestry is a vibrant, respected industry in Tairawhiti

#### **Collaboration**

The Eastland Wood Council (EWC) believes in the value of collaboration. We want to work closer with the GDC to improve the planning and delivery of important regional priorities, for the forestry Industry and the community.

#### **Our environment and regulation - *improving biodiversity***

*We support an increase in rates on the basis the increase is invested in erosion control, including planting more trees and pest control.*

*More trees (not less) will be required to prevent the more vulnerable parts of the Tairawhiti region from ending up in the sea.*

Eastland Wood Council members are dedicated to the highest standards of sustainable silviculture and environmental practice.

#### **Our roads and transport**

*We support an increase in budget to maintain our roads.*

*The rural road network is of critical importance to our industry, our people AND all communities in Tairawhiti.*

EWC has provided further feedback to GDC in relation to the changes to roading rate for forestry;

The regions rural roads are in poor condition and additional funding is required to improve the current state. The forestry industry accepts its responsibility to pay for the scale and impact of its use, but this needs to be on a fair and equitable basis which is justified through robust analysis which accurately reflects the proportion of use and impact from all major industries using the regions roads.

The forestry industry is not the only rural industry that is undergoing strong growth within the region. The horticulture industry is stated being the largest and fastest growing industry in Gisborne, yet the targeted roading differential for horticulture/pastoral remains unchanged from 2015, at a weighting of 1.5.

Given the new proposed weighting is 10 for forestry, EWC does not consider this differential to be fair and equitable when considering the forecast growth for this sector.

The EWC supports the use of calculations and analysis in determination of roading rates. However, it is considered the current analysis is not robust and still has some gaps. The current analysis does not take into account all research available to determine use of roads and pavement consumption nor does it accurately capture all roads used by forestry.

### **Stantec Report - Forestry roading rates**

1. The Stantec Report that has determined the recommended roading differential has updated its 2014 assessment with an increase from 5% to 9% of the percentage of heavy vehicles using the network and an increase of 1MT of forestry produce being delivered on the network.
2. The new calculated roading rate specified in the report would result in a 15.7% increase in roading rate should it be implemented. This calculates to a monetary total value of \$243,000.
3. The report refers to additional roads as “potentially utilised forestry roads” being identified by Council Contractors before the completion of the report. If these roads were included in the new calculated rate, then there would be an increase of 31.5%.
4. It does appear the GDC has taken on board the 31.5% increase in roading rate, which includes the calculated maintenance costs for additional roads “potentially utilised by forest” which would align with the differential from 7.5x to 10x.
5. The report includes Willows Road in the urban roading network. It is prohibited to use Willows Road to access the forestry processing and storage sites on Dunstan Road.
6. It is considered the Stantec Report has a number of flaws. The use of data on the additional roads “potentially utilised by forestry” raise question marks as the report states these have not been part of the forestry studies that are used in the main body of the report, nor have they formed part of previous analysis.
7. EWC suggests GDC includes the findings of engineering studies undertaken by District Council’s Road Controlling Authority Special Interest Group on Low Volume Roads in their analysis, namely: “The Impact of Pavement Wear (TERNZ 2017)” and “Guidelines for equitable funding of pavement maintenance for low volume roads” to further analyse the long-term pavement maintenance costs for low volume roads to ensure a more equitable charging formula for targeted rating of various land uses for pavement consumption based on road demand and ESAs.

**Request of GDC - Our roads and transport**

1. EWC would like to see analysis which includes all major industries using the regions roads, not just forestry.
2. EWC supports the inclusion of smaller woodlots to be included in the definition of forestry and therefore be contributing to the roading costs.
3. EWC suggests GDC addresses the gaps identified in the Stantec Report determining all “actual” forestry roads and make analysis based on whole picture rather than only part of it.
4. EWC suggests GDC to use all research available to determine appropriate roading rates.

Regards



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**Attachments**

1. Letter dated 18<sup>th</sup> February 2021 to GDC re Rural Road Planning
2. Submission dated 5<sup>th</sup> October 2020 to GDC re Changes to Roading rate for forestry