

# FURTHER SUBMISSION ON PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

(Closing date: 5pm Tuesday 29 March 2016)

**To:** Chief Executive Officer  
Greater Wellington Regional Council  
P O Box 11646  
Wellington 6142

**Further Submission on:** Proposed Natural Resources Plan for the Wellington Region  
(proposed NRP))

**Name of Submitter:** Ravensdown Limited.

**Address of Submitter:** C/- CHC Ltd  
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Tawa  
WELLINGTON 5249  
Attention: Chris Hansen

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1. A detailed further submission is attached.
2. Ravensdown Limited (Ravensdown) is an organisation who has an interest in the proposed NRP that is greater than the interest the general public has.
3. Ravensdown wishes to be heard in support of this further submission.
4. Ravensdown would be prepared to consider presenting its submission(s) in a joint case with others making a similar submission at any hearing.



.....  
Chris Hansen  
Authorised Agent of Ravensdown Limited  
29 March 2016  
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Date

<b>Submitter ID/ Name</b>	<b>Point ID</b>	<b>Plan Provision/Relief Sought</b>	<b>Support/ Oppose</b>	<b>Reason</b>
Horticulture NZ Federated Farmers of NZ	S307/006 S352/028	Definition: Good Management Practice The submitters seek amendments to the definition of Good Management Practice	Support	Ravensdown supports the amendment to the definition of Good Management Practice sought by the submitters as they are consistent with the amendments it sought in its own submission, and is clear and accurate.
Environmental Defence Society	S110/003	2 Interpretation: Definition of the term Mitigation The submitter requests a new definition 'mitigation'.	Oppose	Ravensdown opposes the new definition of 'mitigation' proposed by the submitter, and in particular the use of the term 'abatement'. Ravensdown considers the definition is unnecessary and inappropriate.
Federated Farmers of NZ	S352/065	3.2 Beneficial use and development The submitter seeks a new objective: <i>"The social, economic, cultural and environmental benefits of primary production, manufacturing and processing activities are recognised and provided for."</i>	Support	Ravensdown supports the new objective sought by the submitter as it is considered to be appropriate and provides guidance to the decision maker and plan user, and is consistent with the intent of the RMA.
Fish & Game	S308/024	Section 3.5 Water Quality The submitter seeks an amendment to objective, policies and rules to so that numerical water quality and quantity limits and standards are included which ensure that the life supporting capacity and ecosystem health and processes, cultural, primary recreation, the habitat of trout are protected, and that land use activities are managed to achieve these freshwater objectives/standards/ targets over time.	Oppose	Ravensdown supports the current approach taken in the plan and the intention to introduce limits through plan changes to Whaitua areas in the future. Ravensdown opposes the amendments sought as they are considered inappropriate and unnecessary.

Fish & Game	S308/012	<p>Section 3.5 Water Quality</p> <p>The submitter seeks objectives policies and standards and where applicable rules which recognise and protect regional sports fish and gamebird populations and their habitats, and which recognise and provide for recreational hunting and angling.</p> <p>The submitter also seeks numerical and narrative freshwater objectives/standards/limits/targets which protect the life supporting capacity, ecological health and processes of freshwater and which provide for recreational sports fish species and which provide for primary contact recreation of freshwater environments.</p>	Oppose in part	Ravensdown opposes plan provisions that protect regional sport fish and gamebird populations and their habitats and provide recreational hunting and angling at the expense of other resource uses that have economic and social wellbeing. Ravensdown also opposes the introduction of limits with the sole purpose of protecting areas for sports fish species. It is considered the current proposed NRP provisions provide appropriate provisions to protect habitats for their values, of which sports fish and recreational activities may benefit from, and the provisions sought by the submitter are not necessary or appropriate.
Horticulture NZ Federated Farmers of NZ Dairy NZ & Fonterra Co-operative Group Ltd	S307/017 S352/073 S316/031	<p>Objective 023</p> <p>The submitters seek an amendment to the objective that reads: “<i>The overall quality of water .....</i>”</p>	Support	Ravensdown supports the amendment requested by the submitters as it provides direction to the decision maker and plan user of the intent of the proposed NRP provisions.
Fish & Game	S308/033	<p>Section 3.9 Soil</p> <p>The submitter seeks a new objective which ensures hill country land uses, intensive farming, horticulture, cropping and plantation forestry are regulated to good management practice and output based standards which avoid discharges of sediment to freshwater habitats.</p>	Oppose	Ravensdown opposes the request for a new objective as the proposed NRP provides an interim step before catchment regulations are introduced as part of the Whaitua process and it is more appropriate an objective seeking these outcomes are introduced then. Also, the proposed NRP already includes policies requiring good management practices.
Horticulture NZ	S307/024	<p>Objective 042</p> <p>The submitter seeks an amendment to read: “<i>The life supporting capacity of soils is maintained</i>”</p>	Support	Ravensdown supports the amendment sought by the submitter as an alternative to its own submission request. It is considered the amendment provides direction to the decision maker and plan user of the intent of the proposed NRP provisions.

Horticulture NZ	S307/026	Objective 044 The submitter seeks an amendment to read: <i>“Land use activities will take all reasonable steps to avoid, remedy or mitigate adverse effects on soil and water.”</i>	Support	Ravensdown supports the amendment sought by the submitter as an alternative to its own submission request. It is considered the amendment provides direction to the decision maker and plan user of the intent of the proposed NRP provisions.
Horticulture NZ	S307/027	Objective 0046 The submitter seeks an amendment to read: <i>“Discharges to land are managed to reduce the <u>potential</u> for runoff or leaching of contaminants to water.”</i>	Support	Ravensdown supports the amendment sought by the submitter as an alternative to its own submission request. It is considered the amendment is appropriate and necessary.
Horticulture NZ	S307/028	Objective 047 The submitter seeks an amendment to read: <i>“Minimise potential for sediment laden run off to water where current levels are elevated.”</i>	Support	Ravensdown supports the amendment sought by the submitter as an alternative to its own submission request. It is considered the amendment provides direction to the decision maker and plan user of the intent of the proposed NRP provisions.
Horticulture NZ	S307/030	Policy P1 The submitter seeks an amendment to the policy by adding <i>“f) use of good management practices.”</i>	Support	Ravensdown supports the amendment sought by the submitter as it provides direction to the decision maker and plan user of the intent of the proposed NRP provisions.
Horticulture NZ	S307/031	Policy P4 The submitter seeks an amendment to the policy by adding <i>“Where minimisation of adverse effects is required by the policies in the Plan minimisation means taking all reasonable steps to reduce adverse effects of the activity and includes: ....”</i>	Support	Ravensdown supports the amendment sought by the submitter as it provides direction to the decision maker and plan user of the intent of the proposed NRP provisions.
Fish & Game	S308/043	Policy P4 The submitter seeks Policy P4 be deleted and with a policy that seeks a long list of outcomes.	Oppose	Ravensdown opposes the submitters request as it supports the overall intent of Policy P4 included in the proposed NRP as it provides appropriate guidance to the decision maker and plan user. It is not considered necessary or appropriate to delete the policy and replace it with a list of outcomes sought by the submitter that in most cases require

				avoidance of adverse effects, rather than managing them to acceptable levels.
Horticulture NZ	S307/032	Policy P7 The submitter seeks an amendment to the policy by adding to l) <u>primary</u> production, and by adding to the end of the policy: ' <i>...shall be recognised and provided for....</i> '	Support	Ravensdown supports the amendments sought by the submitter as they provide direction to the decision maker and plan user of the intent of the proposed NRP provisions.
Horticulture NZ	S307/034	Policy P10 The submitter seeks an amendment to the policy to differentiate between provisions which apply to primary contact recreation and those which apply to secondary contact recreation. Alternatively have a separate policy for each.	Support	Ravensdown supports the amendments sought by the submitter as they provide direction to the decision maker and plan user of the intent of the proposed NRP provisions.
Royal Forest & Bird Protection Society	S353/063	Policy P22 The submitter seeks to list adverse effects that are also required to be ' <i>avoided</i> '.	Oppose	While Ravensdown supports the policy avoiding significant adverse effects, it opposes the avoidance of adverse effects. Ravensdown considers adverse effects can be managed through remedying and mitigating them to acceptable levels, and seeks the policy to be amended to recognise this in Policy P22 in its own submission.
Horticulture NZ	S307/037 S307/039	Policy P32 and P41 The submitter seeks an amendment to Policies P32 and P 41 clauses a) b) and c) by changing ' <i>and</i> ' to ' <i>or</i> '	Support	Ravensdown supports the amendments sought by the submitter as they provide direction to the decision maker and plan user of the intent of the proposed NRP provisions.
Fish & Game	S308/062	Policy P65 The submitter seeks policies to ensure the outcomes relating to water allocation, nitrogen leaching rates, nutrient budgets, livestock exclusion, intensified use in over-allocated catchments, nitrogen and phosphorous trading, and costs of reducing over-allocation are achieved;	Oppose	Ravensdown opposes the submission as it is not seeking specific relief but a raft of outcomes in relation to ideas that are not in accordance with the general direction of the proposed NRP. Some of the outcomes sought may fit better in specific catchment plans or the Whaitua process that is yet to come. Ravensdown considers the current proposed NRP provisions are appropriate and further submissions, as sought by the submitter, are not appropriate or necessary.

Federated Farmers of NZ	S352/168	Policy P65 The submitter seeks amendments to the policy that priorities and manages significant effects.	Support	Ravensdown supports the amendments requested as they are consistent with the amendments it sought in its own submission, and provide clear direction to the decision maker and plan user.
Federated Farmers of NZ	S352/171	Policy P96 The submitter seeks amendments to the policy to better reflect the intended approach to managing land use activities by the proposed NRP.	Support	Ravensdown supports the amendments requested as they are consistent with the amendments it sought in its own submission, and provide clear direction to the decision maker and plan user.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/077	Policy P96 The submitter seeks amendments to the policy to better reflect the future way land use activities will be managed.	Support	Ravensdown supports the amendments requested as they are consistent with the amendments it sought in its own submission, and provide clear direction to the decision maker and plan user.
Fish & Game	S308/098	Section 5 Rules The submitter seeks new rules to ensure the outcomes relating outcomes relating to sustainable nitrogen leaching rates, nutrient budgets, livestock exclusion, intensified use in currently over-allocated sub-catchments, nitrogen and phosphorus trading, allocation principles from Beef and Lamb are achieved;	Oppose	Ravensdown opposes the submission as it is not seeking specific relief but a raft of outcomes in relation to ideas that are not in accordance with the general direction of the proposed NRP. Some of the outcomes sought may fit better in specific catchment plans or the Whaitua process that is yet to come. Ravensdown considers the current proposed NRP provisions are appropriate and further submissions, as sought by the submitter, are not appropriate or necessary.
Beef & Lamb NZ	S311/011	Rule R42 The submitter seeks Council to rewrite and align R42, R69 and R93 to provide for land uses that result in discharges to land where they may enter water, being a permitted activity, where the permitted land uses includes, but is not limited to, all forms of primary production.	Support	Ravensdown supports the amendments requested as they are consistent with the amendments it sought in its own submission, and provide clear direction to the decision maker and plan user.

Fish & Game	S308/089	<p>Rule R69</p> <p>The submitter seeks to amend the rule to include “<i>shall not enter water either directly or indirectly</i>”.</p>	Oppose	Ravensdown sought in its own submission that Rule R69 be deleted, but if Council retained the rule, that condition (a) be deleted. The submitter seeks an amendment to condition (a) which is opposed as it is onerous and would mean a resource user may not be able to determine whether the minor contaminant may enter the water indirectly, meaning permitted activity status is not certain. Having uncertain permitted activity rules is not considered best resource management planning practice.
Friends of the Paekakariki Streams	S112/094	<p>Rule R82</p> <p>The submitter seeks the activity status to be changed from permitted to discretionary.</p>	Oppose	Ravensdown opposes this request as it considers permitted activity status for the application of fertiliser is appropriate in accordance with the conditions within the rule. Discretionary activity status would require consents sought by all farmers which would be costly and onerous, and does not represent sound resource management practice.
Regional Public Health	S136/018	<p>Rule R82</p> <p>The submitter seeks the wording of proposed rule be amended by inclusion of a new clause “<i>(d) the discharge is not to an area with existing elevated groundwater nitrate levels.</i>”</p>	Oppose	Ravensdown opposes the requested amendment. Restricting applications of fertiliser that do not contain nitrogen will not address the issue the submitter is looking to trying to address. Elevated nitrate levels in groundwater can come from a number of sources but one of them is not from fertiliser application. Experienced practitioners applying fertiliser in general accordance with the Code of Practice for Nutrient Management means that the fertiliser requirements are matched to the requirements of the pasture or crop. The proposed amendment would restrict the application of fertiliser required for pasture or crop growth and such a restriction is inappropriate and unnecessary.
Horticulture NZ	S307/067	<p>Rule R82</p> <p>The submitter seeks an amendment to Rule R82 clause a): “<i>The discharge does not cause adverse effects beyond the boundary of the property.</i>”</p> <p>Add new clause: “<i>The applications will be undertaken using good management practices to minimise the potential for wind drift having regard to the Code of Practice for Nutrient Management (Fertiliser Association).</i>”</p>	Support	Ravensdown supports the amendments sought by the submitter as they are consistent with its own submission; provides clarity regarding what the condition requires; and represents sound resource management practice.

Beef & Lamb NZ	S311/015	<p>Rule R82</p> <p>The submitter seeks an amendment to the rule that deletes Condition (a) and replaces it with: <i>“ground-based and aerial applications of fertiliser must follow the latest available Fertiliser Association of New Zealand Code of Practice; and”</i></p>	Support	Ravensdown supports the amendments sought by the submitter as they are consistent with its own submission; provides clarity regarding what the condition requires; and represents sound resource management practice.
Federated Farmers of NZ	S352/200	<p>Rule R85</p> <p>The submitter seeks the deletion of Condition (c).</p>	Support	Ravensdown supports the amendments sought by the submitter as they are consistent with its own submission and represents sound resource management practice.
Horticulture NZ	S307/079	<p>Method M12</p> <p>The submitter seeks a new method be added – <i>“Development of good management practices. The Council will work with industries and relevant stakeholders to develop good management practices that provide for robust and reasonable tools to manage activities regulated through the Plan.”</i></p>	Support	Ravensdown supports the amendments sought by the submitter as they are consistent with its own submission and represents sound resource management practice.
Federated Farmers of NZ	S352/244	<p>Method M12</p> <p>The submitter seeks a number of amendments relating to developing catchment plans and providing assistance to willing landowners in clauses (c) and (d).</p>	Support	Ravensdown supports the amendments sought by the submitter as they promote catchment wide approaches and collaboration with land owners, and represent sound resource management practice.
Fish & Game	S308/138	<p>Method M28</p> <p>The submitter seeks the method to be amended to include narrative and numerical parameters for good management practice. This should include those elements set out in appendix 10 to this submission, and must include specified management practices [identified in submission].</p>	Oppose	Ravensdown opposes the request to have numerical parameters for good management practices included in the method. It is inappropriate and does not represent sound resource management practice.



Fertiliser Association of NZ	S302	Entire Submission	Support	Ravensdown supports the entire submission of the fertiliser Association of NZ, and the relief sought.
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