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Attention: Robyn Harrison
11 July 2008

Ravensdown one plan hearing submission Final.doc

Attention: Chairman, Horizons One Plan - Hearings Committee

Dear Sir

Written Submission to the Hearings Committee on the Proposed One Plan, Land Section

1. Introduction

Ravensdown Fertiliser Co-operative Limited (Ravensdown - submitter number 379) made a submission to the Horizons Proposed One Plan. This submission addressed four aspects relating to the Land Section relating to:

1. Land Use Capability Data;
2. The FARM Strategy;
3. Working Towards a Better Future/ Codes of Practice and other Good Practice Initiatives;
4. Rule 12-7 Activities within at-risk habitats; Policy 13-: Consent decision making for discharge to water.

Ravensdown have reviewed the Horizons Regional Council's Officer Report on Submissions to the Proposed One Plan; relating to the Land Chapter. Only one aspect has been addressed in the Officer Report: Working Towards a Better Future/ Codes of Practice and other Good Practice Initiatives.

Ravensdown outlined its **support** to the intent of these proposed provisions within its initial submission. However Ravensdown also outlined its concerns and opposition to how the intent was carried forwards into other Proposed One Plan provisions. Ravensdown do not consider that its concerns have been adequately addressed in the Officer Report, hence the necessity to make this written submission. The additional matters raised by Ravensdown will be addressed at later hearings.

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2. Submission Points

2.1 Section 1.5 Working Towards a Better Future; Section 1.6 Codes of Practice and other Good Practice Initiatives; Policy 5-5 – Codes of Practice.

Ravensdown's Original Submission

Ravensdown sought the following decision from Horizons on these provisions:

- Ravensdown supported the provisions that promote the use of Code of Practice and Good Practice Initiatives and sought for Council to retain the intent and approach as it is currently written.
- Ravensdown suggested a website link and sought particular reference to the Code of Practice for Nutrient Management Use (2007).
- Ravensdown sought Council to address its concerns regarding Farm Plans as outlined in other parts of this submission (submission number: 379–8).

The first two submission points have not been addressed in the Officer Report. No reasoning is given for not considering these aspects of Ravensdown's submission. The third submission point has been assessed in the Officer Report.

Officer Report Recommendations

The Officer Report's recommendation is to **reject** Ravensdown's submission 379-8. No specific reasoning appears to be provided within the Officer Report to identify why this recommendation is made.

Comment

Ravensdown reiterates its main concern that normal farming activities should not require resource consent.

As such Ravensdown considers it is more appropriate, in line with the general provisions of the Proposed One Plan, to control normal farming activities through the use of non-statutory guidance material (Section 1.5 & 1.6 and Policy 5.5). Section 1.5 and 1.6 helps to identify Councils' intention to promote the use of non regulatory initiatives, while Policy 5-5 seeks to support Codes of Practice and best management practices (as outlined within 1.5 & 1.6) that will assist in the achievement of more sustainable land use. Section 1.5 of the plan specifically states that *"...Our preference in this Plan is to use approaches that promote and encourage voluntary adoption of environment-friendly resource use practices..."* and *"If this emphasis on*

promoting and encouraging change is not effective, Horizons will be forced to switch its policy emphasis to using rules to require appropriate changes at the time of the next Plan review."

Ravensdown consider that the use of restrictive rules requiring resource consent for farming activities, as included in proposed Rule 13-1, is inconsistent with the approach as outlined in Section 1.5, Section 1.6 and Policy 5.5.

This matter has been addressed by Ravensdown in a number of parts of its submission but this hearing is only considering the specifics of the Land Chapter and particularly our submission upon Policy 5-5. Ravensdown will therefore address its concerns regarding the specific rule more fully at a later hearing.

With respect to the three submissions made by Ravensdown in relation to Section 1.5 Working Towards a Better Future, it is considered that Ravensdown's first submission point should be accepted as it intended to **support** the Officer Report recommendation to retain Policy 5.5 in its current form.

With respect to Ravensdown's second submission point, Ravensdown was trying to be helpful with the suggestions it made, and does not intend to take this matter further.

In relation to the third submission point, Ravensdown does not consider that the relief it sought has been adequately addressed in the Officer Report as no reason is given for the recommendation to reject its submission. As stated above, in principle Ravensdown is opposed to restricting farming activities by requiring resource consents. Ravensdown consider that this view is consistent with Policy 5.5 and sections 1.5 and 1.6 of the proposed One Plan that intends the use of non-statutory and non-regulatory methods for the control of sustainable land uses in order to achieve the desired outcomes consistent with the Resource Management Act 1991.

Ravensdown considers the inclusion of rules to control certain farming activities in other parts of the proposed plan (cited in Rule 13-1) is not consistent with Policy 5-5 and sections 1.5 and 1.6, and should be deleted from the proposed Plan. Ravensdown will be seeking the Commissioners to identify and address these inconsistencies at later hearings.

Relief Sought by Ravensdown

Ravensdown seeks the Commissioners to:

- Accept Ravensdown's submission to support the provisions that promote the use of Code of Practice and Good Practice Initiatives and seeks for the retention of the intent and approach of Section 1.5, Section 1.6 and Policy 5-5.

- Reject the Officer Report recommendation with respect to Ravensdown's entire submission 379-8 and accept the relief sought by Ravensdown. This is specifically to ensure that the proposed Plan is consistent with the Council's intention of using non-statutory methods for controlling farm activities in an enabling and sustainable manner. (Ravensdown will seek the Commissioners to amend other parts of the proposed Plan relating to restrictive regulations/ rules (specifically in rule 13-1) at later hearings).

The outcomes from the relief sought by Ravensdown would be to allow farming activities to operate as permitted activities in accordance with codes of practice and similar methods in line with the direction set out in Section 1.5, Section 1.6 and Policy 5-5 which embodies a non-statutory emphasis to land/farm management.

Yours sincerely,

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