

**SUBMISSIONS ON PROPOSED REGIONAL POLICY STATEMENT FOR WELLINGTON**

**To:** Chief Executive Officer  
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1. The full details of the submission and the decisions sought from the council are contained in the attached paper.
2. Ravensdown wishes to be heard in support of this submission.
3. Ravensdown would be prepared to consider presenting its submission in a joint case with others making a similar submission at any hearing

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*pp. DR/Na*

Chris Hansen

Authorised Agent for Ravensdown  
Fertiliser Co-operative Ltd

.....  
8/6/09

Date

# **SUBMISSIONS ON PROPOSED REGIONAL POLICY STATEMENT FOR GREATER WELLINGTON REGIONAL COUNCIL**

## **1 Ravensdown's interest in the Wellington Region**

The following submissions are made on behalf of Ravensdown Fertiliser Co-operative Ltd (Ravensdown) to Wellington Regional Council's Proposed Regional Policy Statement (proposed RPS) for the Wellington Region.

Ravensdown owns and operates three fertiliser-manufacturing plants in Ravensbourne (Dunedin), Hornby (Christchurch) and Awatoto (Napier). Ravensdown also operates 46 bulk fertiliser stores throughout New Zealand, and has an interest in a further 70 consignment fertiliser stores which are operated by third parties in which Ravensdown products are stored.

In addition to these facilities, Ravensdown operates a number of quarries that mine and process agriculture lime in various parts of New Zealand.

Ravensdown takes an interest in regional planning documents – inclusive of Regional Policy Statements from two perspectives – how plan provisions affect their own manufacture and storage activities, and how the plan provisions may affect the users of their products. When considering planning documents Ravensdown wishes to ensure planning provisions are enabling and are not unduly restrictive.

Within the Wellington Region a significant bulk store is that of Taratahi (located between Carterton and Masterton on SH 2). In addition to this the Wellington region has high agricultural values, particularly pastoral farming, and this signifies the importance of soil conditions and fertiliser use in the region.

## **2 General Comments**

Ravensdown has assessed the proposed Plan in detail in relation to its interests outlined above. Overall the intent of the proposed Plan is generally **supported** by Ravensdown. However, there are a number of specific matters that Ravensdown would like to submit on. These are detailed in the following specific submission points.

### **3 Specific Submissions on Proposed Regional Policy Statement (RPS)**

#### **3.1 Air Quality**

##### **Submission:**

- Ravensdown supports policy 1: Reverse sensitivity associated with odour, smoke and dust.

Ravensdown supports Greater Wellington Regional Council introducing a policy to protect activities from reverse sensitivity. Ravensdown believes that it is important that sensitive activities do not locate near land uses or activities that emit odour/dust/smoke which may adversely affect the health and amenity of people.

##### **Ravensdown seeks the following decision from Council:**

- Retain Policy 1 to prevent reverse sensitivity issues from arising.

#### **3.2 Freshwater (including Public Access)**

##### **Submission:**

- Ravensdown supports method 35: the initiation of industry-led environmental accords and codes of practice.

Ravensdown supports Greater Wellington Regional Council introducing Method 35 to promote best practice through supporting industry-led environmental accords and codes of practice for stormwater runoff and earthworks.

##### **Ravensdown seeks the following decision from Council:**

- Retain Method 35: the initiation of industry-led environmental accords and codes of practice.

#### **3.3 Landscape**

##### **Submission:**

- Ravensdown opposes in part Objective 17 and Policies 24-27.
- Ravensdown supports method 49.

Ravensdown is concerned about Greater Wellington Regional Council introducing objectives and policies in this section which may conflict with the following section 'Soil and Minerals', specifically objective 30 and Policy 60. Ravensdown believes that it is important to achieve a balance between efficiently using land and protecting outstanding landscapes and that clear direction should be given by Council to avoid disputes regarding how natural resources should be efficiently used and natural values protected.

For example, Objective 17 states that “*The region’s outstanding natural features, landscapes and significant amenity landscapes, are identified and their values protected, maintained or enhanced*” (Page 48) while Objective 30 states that “*The demand for mineral resource is met from local sources as much as possible*” (Page 71). These objectives can be hard to balance effectively where there are significant natural resources within outstanding landscapes.

Ravensdown suggests that Council include acknowledgement of the need for a balance in Objective 17 and accompanying Policies 24-27 and also provides clarification as to how conflicting objectives and policies will be resolved to improve certainty and reduces the level of subjectivity.

Ravensdown is supportive of Greater Wellington Regional Council introducing Method 49 which states that “*Prepare a regional landscape character description (implement Policies 24 and 26)*” (Page 48). This will help to provide more certainty on the recognised values and characters of particular landscapes.

**Ravensdown seeks the following decision from Council:**

- Review Objective 17 and Policies 24-27 to take into account the need to balance the protection of outstanding and significant landscapes with the importance of resource use (refer to the Soil and Minerals section).
- Provide further guidance on how Objective 17 and Policies 24-27 and Objective 30 and Policy 60 are to be balanced in order to provide certainty and reduce subjectivity.
- Retain Method 49.

### **3.4 Soil and Minerals**

**Submission:**

- Ravensdown supports Objective 30, Policy 60 and Method 51.

Ravensdown supports Greater Wellington Regional Council introducing Objective 30, Policy 60, and Method 51 in order to recognise and support the importance of mineral resources to the region.

**Ravensdown seeks the following decision from Council:**

- Retain Objective 30, Policy 60 and Method 51.
- Ravensdown also seeks to be involved in the process of identifying ‘the region’s significant mineral resources.

### **3.5 Regional Form, Design and Function**

**Submission:**

- Ravensdown opposes in part Objective 21 (e), Policy 55 and Method 4.

Ravensdown is concerned about Greater Wellington Regional Council's approach in introducing Objective 21 (e), Policy 55 and Method 4. They do not provide enough direction on how existing and future rural activities will need to be managed to meet the intention of these provisions. They could have unintended effects on what development is allowed when considering these objectives and policies for resource consent applications in rural areas. For example, Policy 55 (a) and (b) could restrict the future alteration or new build of a fertilizer store, which is an appropriate activity to occur in a rural area.

**Ravensdown seeks the following decision from Council:**

- Review Objective 21 (e), Policy 55 and Method 4 to give direction on how this will affect existing rural development and future rural developments.