

BEFORE MANAWATU-WANGANUI REGIONAL COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions to the Proposed
'One Plan'-Overall Plan Section

Wanganui District Council Submission

The following is an expansion of the submission made by Wanganui District Council, having received the officers report and evidence distributed.

Submission made:

The specific provisions of the proposed plan that the Council's submission relates to are:

The whole of the One Plan

The Council's submission is:

Wanganui District Council is extremely concerned that the Section 32 assessment of the Proposed One Plan, which accompanies the Proposed One Plan, does not adequately evaluate the benefits and costs of the implementation of the Plan. It is apparent that Horizons has comprehensively evaluated the costs and benefits to the natural environment, and has good science behind that evaluation, however there is little evidence that the social, cultural and economic costs and benefits have been given anything close to an adequate evaluation.

The Council seeks the following decision from the Regional Council

That the Proposed One Plan be withdrawn and renotified only after a comprehensive section 32 evaluation has been completed and the Plan has been amended to reflect the outcome of the evaluation.

Although the officers report recommends rejecting the remedy sought by the Wanganui District Council, it is very pleasing to see that the reporting officer accepts that "if there is merit in assessing the economic benefits and costs of particular policies then this will be done" The Wanganui District Council is in full agreement with the reporting officer, that it is important that any economic benefits and costs analysis is seen in the context of all other benefits and costs, and for the policies to be assessed holistically.

The concern that the Wanganui District Council had, is that in the absence of an assessment of the economic benefits and costs of particular policies, the Section 32 assessment of the POP did not include all of the information

necessary to make a holistic assessment. If the hearings panel is provided with this information, and it forms part of the section 32 analysis for the POP, the WDC concerns over the adequacy of the assessment will be allayed.

The specific provisions of the proposed plan that the Council's submission relates to are:

The whole of the One Plan

The Council's submission is:

Wanganui District Council is extremely disappointed that, a request from all of the Chief Executives within the Manawatu-Wanganui Regional, to extend the time for submissions to 14 December 2007, was declined. Although Horizons Regional Council carried out consultation prior to the notification of the Proposed One Plan, the time set down for the WDC and the community to evaluate the implications of the Proposed One Plan, was the first opportunity Council and the community has had to evaluate the implications of the One Plan in its entirety, and because of the sheer volume of information and the complexity of the Plan, the time set for submissions was grossly inadequate.

The Council seeks the following decision from the Regional Council

That Horizons Regional Council accept that if all of the Territorial Authorities within the Region have a common concern, they may have a point. That the Proposed One Plan be withdrawn and renotified only after all TA's have had sufficient time to evaluate the implication and the Plan in its entirety, or alternatively, extend the period for submissions to allow sufficient time for all TA's to evaluate the implication of the Plan in its entirety, and to make a comprehensive, fully informed submission.

The Wanganui District Council does not dispute that HRC may well have fulfilled its statutory obligations under the RMA, in terms of consultation. What prompted WDC to submit on this issue was the sheer magnitude of the task confronting submitters to assess and evaluate what amounts to a review of a Regional Policy Statement, Regional Coastal Plan, Land and Water Regional Plan, the Regional Plan for Beds and rivers and Lakes, the Regional Air Plan and number of other resource management documents.

Although there was a significant period of consultation prior to notification of the Proposed One Plan, and Horizons extended the time for submissions, the period provided did not allow submitters sufficient time to evaluate and test the plan in a comprehensive way. The consequence of this is that the submission from WDC is generic in nature, and significant time will be expended at the hearing stage to elaborate. If further time had been afforded WDC some of the issues may well have been resolved prior to the hearing.