

IN THE MATTER OF the Resource Management
Act 1991

AND

IN THE MATTER OF the Proposed One Plan
notified by the Manawatu-
Wanganui Regional Council,
hearing related to Overall
Plan submissions.

STATEMENT OF EVIDENCE OF RICHARD ZANE PETERSON

1.0 INTRODUCTION

- 1.1 My name is Richard Zane Peterson and I am an Associate and the Wellington Planning Manager of Harrison Grierson Consultants Limited.
- 1.2 I have a Masters Degree in Regional and Resource Planning (with Distinction), completed in 1997, and have some 12 years planning and resource management experience. I have worked as a planner in both the private and public sector, including work for both territorial authorities and a regional council. During my career I have been involved in a number of resource consent, designation and plan and policy making processes and consequently have been involved in many local authority hearings.
- 1.3 In my role as Manager of Harrison Grierson's Wellington Planning team, I oversee a team of five planners (myself included) who work for a wide range of clients including the resource consent and policy arms of local authorities, telecommunication providers, central government ministries and agencies, industry bodies, land developers and other private clients.
- 1.4 Amongst others things I have recently assisted the Greater Wellington Regional Council in preparing draft Regional Policy Statement provisions in relation to energy and regional form. I have also recently worked with the New Zealand Institute of Economic Research to complete the Section 32 evaluation for the proposed National Policy Statement on Electricity Transmission, on behalf of the

Ministry for the Environment. I am currently assisting the Ministry for the Environment to review the Section 32 guidance material available on the Quality Planning Website.

- 1.5 I appear in connection with the submissions and further submissions lodged on the proposed One Plan by Mighty River Power Limited. I was engaged by Mighty River Power to present evidence in relation to their submissions, but was not involved in the preparation of the submissions.
- 1.6 I have read the Environment Court Consolidated Practice Note 2006 and agree to comply with it and to apply it as if it was a duty to the Hearings Panel. I understand that as an expert witness I have an overriding duty to assist the hearing panel impartially on relevant matters within my area of expertise. Except where I state that I am relying upon the specified evidence of another person, my evidence in this statement is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions which I express.

2.0 SCOPE OF EVIDENCE

- 2.1 My evidence is divided into two parts. In Part One, I provide an overview of the planning basis and policy framework that underpins the Mighty River Power submission. This includes consideration of the key role and purpose of Regional Policy Statements and of the growing body of policy that sets the framework for, and is relevant to, the Mighty River Power submission.
- 2.2 In Part Two of my evidence, I will guide you through the specific Mighty River Power submissions which are to be addressed at this overall Plan hearing.

3.0 EXECUTIVE SUMMARY

- 3.1 In accordance with the directions of the Chair of the Hearing Panel the following bullet points provide a summary of my evidence:

Part One

- Mighty River Power's submission does not oppose the combined approach taken in the One Plan to the Regional Policy Statement (RPS) and the Regional Plan. However Mighty River Power does seek to ensure that the One Plan appropriately reflects the differences between regional policy statements and regional plans, including;

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- Their differing positions in the Resource Management Act (RMA) policy hierarchy;
 - Their different purposes; and,
 - The differing ability of individuals and organisations to request changes to the documents.

I agree with this position.

- RPSs have a specific and significant function within the RMA policy hierarchy. The purpose of the RPS is to provide an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region. This function needs to be reflected in the content of the RPS through explicit recognition of the benefits arising to community well-being, from *use and development* of natural and physical resources.
- Within both the RMA and national policy there is a growing emphasis on the need to recognise the benefits from the generation, transmission and use of energy, particularly renewable energy. This legislative and policy context should be recognised in the One Plan.

Part Two

- The Schedules contained in the proposed One Plan contain detailed and technical information that, among other things, determine the consent status of activities. The One Plan explicitly recognises that not all of the schedules are based on good information. I therefore consider that it is appropriate that individuals and organisations, such as Mighty River Power, have the opportunity to request changes to these schedules should they obtain more accurate or up-to-date information. If these schedules remain part of the RPS, as well as the Regional Plan, this opportunity will not exist.¹
- Mighty River Power's submission point 359/2 argues that the proposed One Plan does not adequately recognise the enabling presumption within the purpose of the RMA. The submission therefore requests the inclusion

¹ Clause 21 Part 2 of the First Schedule to the RMA only allows requests for plan changes for district and regional plans (and not regional policy statements).

of a new section in the RPS which expressly recognises the benefits to people and the community from the use of natural and physical resources. While I believe that the concerns raised in Mighty River Power's submission are valid, I do not believe that the inclusion of a new section would most appropriately resolve them. It is my opinion that it would be more appropriate for Council to make changes to chapters 1 and 3 of the One Plan to better reflect the enabling presumption of the Act and to better recognise the benefits of electricity generation. These matters will be addressed in more detail at the relevant hearings on chapters 1 and 3. If following those hearings, the relevant proposed changes are not accepted, Mighty River Power's request for a separate section to be included in the One Plan covering the enabling presumption of the RMA remains as relief requested.

- I support the Officer's recommendation in section 4.8.3 of their report to accept in part the various requests for consequential amendments.
- Finally, I agree with the Officer's recommendation to accept (in part) the submission of Landcorp Farming Ltd (submission 235/1) and further submission of Mighty River Power. It is my opinion that the approach taken by the Council to consider provisions separately for the purposes of section 32, at relevant hearings, is appropriate and that in making its decisions Council must take account of all benefits and costs associated with proposed provisions not just the financial costs to farming.

Part One – Background to the Mighty River Power Submissions

4.0 OVERVIEW

- 4.1 It is relevant to note that Mighty River Power has not submitted against the overall structure of the proposed One Plan, which combines the RPS and Regional Plan in one document. I agree with this position and the evidence of Andrea Bell in connection with her explanation of the intent of the One Plan to provide '*a simpler, more focussed plan*'...which is '*more user friendly than the suite of documents it would replace*'.
- 4.2 However, the Mighty River Power submissions seek to ensure that, in taking this approach, the Regional Council maintains a clear distinction between the regional policy statement and regional plan.

4.3 I agree with this position and my evidence which follows seeks to support this broad point. I consider that it is important that the Regional Council's decisions on the One Plan clearly reflect the differences between regional policy statements and regional plans, including:

- Their different positions in the Resource Management Act (RMA) policy hierarchy;
- Their different purposes; and,
- The differing ability of individuals and organisations to request changes to the documents.

5.0 THE ROLE & FUNCTION OF REGIONAL POLICY STATEMENTS

5.1 The proposed One Plan is broken into two parts. Part One includes the Regional Policy Statement, while Part Two is the Regional Plan.

5.2 The Hearing Panel will be aware that section 59 of the RMA sets out the purpose of RPSs as follows:

"The purpose of a regional policy statement is to achieve the purpose of the Act by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region".

5.3 This reflects the functions of regional councils under the RMA, which section 30 states to be, among other matters²:

"The establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region..."

5.4 As these sections of the RMA indicate, RPSs are critical resource management documents in that, in achieving the purpose of the Act, must provide an overview of the resource management issues for the region and set the policy direction to achieving integrated management in the region. RPSs in this regard are key to setting the resource management policy for the region, and not just for the functions and environmental activities of the regional council. In this

² Section 30(1)

connection it is relevant to recognise that through sections 67 and 75 of the RMA both regional plans and district plans must give effect to any RPS.

- 5.5 The emphasis on integrated management and the reference back to the purpose of the RMA requires Council to give consideration to all values placed on the region's natural and physical resources, including values and benefits which are derived from the *use and development* of those resources. To achieve the integrated management of natural and physical resources within a region, in my opinion a Council must explicitly recognise that the ongoing use and development of natural and physical resources is a significant resource management issue for the region. In some cases the use of such resources is critical for the social and economic well being of the region's communities as well as for health and safety. Examples being the supply of drinking water at safe drinking standards and a secure electricity supply.
- 5.6 I do not consider that the proposed One Plan fully achieves the requirement in relation to integrated management or the overview of the resource management issues for the region.

6.0 THE LEGISLATIVE AND POLICY FRAMEWORK

- 6.1 The following section provides an overview of the legislative and policy framework within which the proposed One Plan needs to be considered. The comments in this section of my evidence provide background for Mighty River Power's submissions in later hearings, as well as its submission in this hearing that the 'enabling' element of Part II is not given sufficient recognition in the proposed One Plan (OVR7 – submission 359/2).

The Resource Management Act

- 6.2 The Hearings Panel will be well aware that in making its decisions on submissions, Part II of the RMA requires it to, among other things:
- Promote the "sustainable management" purpose in Section 5; and,
 - Have particular regard to the matters in Section 7.
- 6.3 I shall comment on these matters in relation to Mighty River Power's key submission that the proposed One Plan should explicitly reflect the 'enabling'

presumption within the RMA as well as the 'management' function. By not explicitly mentioning all sections and subsections of Part II, it is not my intent to disregard the significance of those provisions. However, my purpose is to highlight those provisions of Part II which go to the RMA's enabling presumption and which, in doing so, go to Mighty River Power's submission that this presumption should be given explicit recognition and a regional context in the One Plan.

Section 5, Purpose of RMA

6.4 Section 5 of the RMA provides that the purpose of the Act is to promote sustainable management of natural and physical resources. "Sustainable management" is defined to mean:

"... managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety while –

(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment."

6.5 Section 5 requires the Hearings Panel, in making its decisions on the proposed One Plan, to make an overall judgement as to whether the proposed provisions would appropriately enable people and communities to achieve their well-being, and maintain their health and safety, both now and in the future. The people and communities of the Manawatu-Wanganui Region and of New Zealand seek to provide for their social, economic and cultural well-being, and their health and safety in a wide range of ways.

6.6 One of the ways for communities to provide for their well-being is through use of natural and physical resources for the generation and transmission of electricity. The essential nature of electricity to the well-being of people and communities is reflected in the national policy described below, and is described in the evidence of Mr Hunter presented on behalf of Mighty River Power.

Section 7, Other matters

6.7 The Council is required by Section 7 of the Act to "have particular regard" to the specified "other matters" listed in that section which, in connection to the Mighty River Power submission, relate to:

- (b) *efficient use and development of natural and physical resources; and,*
- (j) *the benefits to be derived from the use and development of renewable energy.*

6.8 Both Section 7 (b) and (j) require Council to have particular regard to use and development when considering the provisions of the One Plan.

National Policy Statements, Environmental Standards & National Energy Policy

6.9 Over the past few years, amendments to the RMA have recognised the benefits of renewable energy generation. Central government has released or is preparing several policy documents which do likewise. These include:

- The National Policy Statement (NPS) on Electricity Transmission – among other things the NPS seeks to facilitate the use and development of electricity transmission facilities by requiring local authorities to include facilitative provisions in their resource management plans;
- The New Zealand Energy Strategy to 2050³ - One of the seven focus areas for the NZES is the promotion of renewable energy. In this regard the Strategy states that (page 20):
- *"It is in New Zealand's longer-term economic and environmental interests to meet increases in demand through an economic mix of renewable energy sources that will meet our security objectives. ...In this strategy, the government is introducing a target for 90 percent of electricity being generated from renewable sources by 2025.... To achieve this outcome, a very high rate of investment in new renewable generation, lower utilisation of existing fossil fuel plant and decommissioning of older fossil fuel plant is required."*

³ Powering Our Future: Towards a sustainable low emissions energy system, October 2007

- The New Zealand Energy Efficiency and Conservation Strategy (NZE ECS) is a strategy prepared under the Energy Efficiency and Conservation Act. The NZE ECS sets out actions to promote more efficient use of energy.
- The current preparation of an NPS on renewable electricity generation. An August 2007 Cabinet Paper⁴ suggests that as a minimum it could be expected that the NPS could contain provisions requiring councils to consider objectives for promoting the sustainable management of renewable energy generation and recognise the national benefits of renewable energy when preparing plans and policy statements.

6.10 It is noted that the Climate Change (Emissions Trading and Renewable Preference) Bill was tabled in Parliament in December 2007. Amongst other things, this Bill intends to give effect to the NZES by amending the Electricity Act 1992 to create a preference for renewable electricity generation. The Bill proposes to do this by implementing a 10-year restriction on new baseload fossil fuelled thermal electricity generation, except to the extent required to ensure the security of New Zealand's electricity supply.

6.11 This developing policy framework provides important background to the Mighty River Power submission and is relevant to Council's consideration of the specific decisions requested by Mighty River Power.

Part Two – Mighty River Power Overall Plan Submissions

7.0 INTRODUCTION

7.1 This part of my evidence addresses Mighty River Power's specific submissions and further submissions relevant to the Overall Plan Hearing. The relevant Mighty River Power submissions seek:

- The removal from all sections of the RPS references to any of the schedules attached to the regional plan and the inclusion of a statement in the opening section of the Regional Plan and schedules that they form part of the Regional Plan and are not part of the Regional Policy Statement (see sections 3.1.1 and 3.2.1 of the Mighty River Power submission and section 4.2, OVR 2, of the Officer report);

⁴ Providing National Guidance on Renewable Energy Projects through the Resource Management Act 1991

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- The addition of a new section to the RPS that includes objectives and policies recognising the benefits that people obtain from the use and development of natural and physical resources (see section 2.2.1 of the Mighty River Power submission and section 4.7, OVR 7, of the Officer report); and
 - Consequential amendments in relation to each request (see section 2.6 of the Mighty River Power submission and section 4.8 of the Officer report).

7.2 The relevant Mighty River Power further submissions:

- oppose in part the submission made by AFFCO NZ Ltd (see section 4.7 of the Officer report). I address this further submission in the context of my consideration of section 2.2.1 of the Mighty River Power submission and section 4.7 of the Officer report; and
- oppose the submissions made by Landcorp Farming Limited (see section 4.4 of the Officer report).

8.0 STRUCTURE OF THE PROPOSED ONE PLAN - OVR 2

Mighty River Power submissions

8.1 Section 3.1.1 of the Mighty River Power submission seeks the removal from all sections of the RPS of references to any of the schedules attached to the Regional Plan. Related to this, section 3.2.1 of the Mighty River Power submission seeks the addition of a statement in the opening section of the Regional Plan and schedules that they form part of the Regional Plan and are not part of the RPS.

8.2 Mighty River Power has made these submissions as it believes that these schedules are most appropriately part of the Regional Plan not the RPS. Mighty River Power is concerned that if the schedules remain part of the RPS then they will not have the option to seek amendments to them, if more accurate information becomes available.

Further submissions on the Mighty River Power submissions

8.3 The Minister of Conservation has submitted in opposition to both Mighty River Power submissions. The reasons for this opposition are that the Minister believes that the proposed provisions will better achieve the purpose of the Act.

The Minister therefore considers it appropriate to include the schedules in the RPS, particularly where they relate directly to matters referred to in the RPS.

- 8.4 TrustPower Limited has submitted in support of the Mighty River Power submission 3.2.1. The reasons for this submission are that the amendments are appropriate and beneficial in principle. TrustPower therefore supports the submission as a means of clarifying the intent of the Regional Plan.

Comment on the Officer recommendations

- 8.5 The Officer report recommends that the Mighty River Power submissions be rejected.
- 8.6 The Mighty River Power submissions will be addressed in Mighty River Power's legal submissions. However from a planning perspective I note that because the schedules contain technical information which affects the consent status of activities. Therefore, these provisions should be able to be changed by individuals and private organisations if new and more accurate information is obtained. By way of example, policy 6-17 of the RPS clearly indicates that in certain circumstances '*good hydrological information*' was not available for use in setting minimum flows and core allocations. In these instances more generic standards have been included in the One Plan. Should an existing or potential resource user be able to obtain specific hydrological information then it would, in my opinion, be appropriate that they have the opportunity to request changes to the relevant schedule. This opportunity would not be available should the schedules remain part of the RPS.

9.0 OTHER MATTERS – OVR 7

Mighty River Power Submissions

- 9.1 Section 2.2.1 of the Mighty River Power submission seeks the addition of a new section to the RPS that includes objectives and policies which expressly recognise the benefits that people and communities obtain from the use and development of natural and physical resources. In requesting this addition Mighty River Power is seeking to make the RPS more consistent with the purpose of the RMA, including more explicit recognition of the enabling presumption contained within that purpose. In doing so, this would provide important guidance for the development of regional and district plans.

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- 9.2 The proposed RPS contains 10 sections, the focus of which is, to a great extent, on the management of the environmental effects of human activity on natural and physical resources. Only relatively limited, and to an extent ad hoc, recognition is given to the benefit which comes from the use of the region's resources.
- 9.3 For example while section 3 of the RPS, to a limited extent, recognises the benefits that accrue from the use of the region's infrastructure, section 6 fails to explicitly recognise that the use of the region's water resources brings significant benefit to the region. The resource management issues identified in that section of the RPS are framed in such a way that the RPS does not recognise the on-going use of the region's water resources to be a significant resource management issue.
- 9.4 In my opinion, the proposed RPS is therefore not consistent with the more enabling approach to resource management sought by the RMA, nor the 'balancing' challenge presented in first sentence of the One Plan.
- 9.5 With this in mind the Mighty River Power submission seeks the inclusion of a new section in the RPS which identifies provisions which expressly recognise the benefits that people and communities obtain from the use and development of natural and physical resources. This amendment to the RPS is sought in preference to changes to each existing section of the RPS as it will help ensure that provisions relating to use of resources do not remain *ad hoc* and as the change can be achieved more easily.

Further submissions on the Mighty River Power submission

- 9.6 Both TrustPower Limited and Genesis Power Limited have made further submissions in support of Mighty River Power's submission.
- 9.7 TrustPower supports this submission on the basis that it furthers the activity of renewable energy generation and recognises its local and national significance and associated benefits.
- 9.8 Genesis supports the submission particularly with regard to the development of electricity generating facilities.

Submissions by AFFCO NZ LTD & Mighty River Power further submissions

- 9.9 It is noted that the submissions of AFFCO New Zealand Ltd – Manawatu and AFFCO New Zealand Ltd – Wanganui Imlay address related matters to the Mighty River Power submission. Both AFFCO submissions seek the inclusion in the RPS and Regional Plan of policies and objectives to ensure that the contribution of industry and development towards the socio-economic wellbeing of people and communities is taken into consideration when assessing applications for resource consent.
- 9.10 In support of their submissions AFFCO NZ argue that the RPS and Regional Plan need to recognise the contribution that industrial and commercial activities make to the socio-economic well-being of communities. AFFCO NZ argue that the One Plan needs to include an overarching policy that enables the contribution of industrial and commercial activities to be considered and appropriately weighted when resource consent applications are considered.
- 9.11 While the broad intent of the AFFCO NZ submissions is similar to that of Mighty River Power, Mighty River Power has opposed (in part) these submissions, via further submissions, because it wishes to ensure that the RPS does not focus solely on primary industry at the expense of other legitimate and essential users such as energy generation.

Comment on the Officer recommendations

- 9.12 The Officer's Report addresses the submissions of Mighty River Power, AFFCO NZ Ltd, TrustPower Limited and Genesis and others in section 4.7. In summary the Officer's recommendation is to reject the submissions of Mighty River Power, AFFCO NZ, TrustPower and Genesis because the:

'use of resources is implicit, and the plan's role is to manage the effect of the use of resources in an appropriate way' (pg 83).

- 9.13 I disagree with this view. Given the significant role of the RPS within the resource management framework for the Manawatu-Wanganui region it is important that it explicitly recognises all significant values attributed to the natural and physical resources of the region and provides for them. If the RPS explicitly recognises certain values and resource management issues and not others, then the implication is that those not addressed are not considered to be of relevance to the integrated management, and ultimately sustainable management, of the region's natural and physical resources.

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- 9.14 The Officer report also states that providing for resource use in the framework of the plan by definition provides for and recognises its benefits, and that the relief sought by submitters is inherent in the framework. In this respect the Officer points to the fact the Regional Plan part of the One Plan permits many activities.
- 9.15 Again I disagree with this view. The Officer report appears to fail to separate the role of the RPS from that of the Regional Plan. The RPS must be treated separately from the Regional Plan as its function and role within the resource management hierarchy is quite different. In this regard it is important to recognise that the RPS sets the direction for both the Regional Plan and district plans within the region. The RPS must therefore stand alone and should not require reference to an implicit direction in the Regional Plan in order for readers to obtain an overview of the resource management issues which face the region and an understanding of the policy direction sought by the RPS in relation to these issues.
- 9.16 Finally, it is noted that the Officer report recommends that the AFFCO NZ submissions be rejected and that Mighty River Power's further submissions be accepted. In recommending that the Mighty River Power further submission be accepted the Officer has misinterpreted its intent. Mighty River Power's intent is not that the additional provisions requested by AFFCO NZ be rejected but rather that they be broadened to include resource users more generally, not just primary industry.
- 9.17 I believe that Mighty River Power's submission can be resolved by the Council making relevant changes to both chapters 1 and 3 of the RPS. With respect to chapter 1, I believe that amendments need to be made to the manner in which Council presents the four keystone environmental issues to ensure that this is in keeping with the purpose of the RMA, and to make it clear that Council does not seek to resolve these issues at all cost. As a broad direction for plans that must give effect to it, the RPS should endorse sustainable forms of development that result in benefits to people and communities.
- 9.18 With respect to Chapter 3, I believe that amendments are required to ensure the provisions of the chapter:
- Identify the sustainable use of the region's resources for electricity generation as a significant resource management issue;
 - Most appropriately recognise the benefits of energy generation; and,
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- More explicitly identify what these benefits are.

9.19 Chapters 1 and 3 of the RPS have been addressed specifically in the Mighty River Power submission. I understand that these parts of the submission will be addressed at separate hearings. I will provide more detailed evidence on these matters and their relation to Mighty River Power's submission point 359/2 at that time. To make it clear Mighty River Power is not withdrawing its submission on this point and may decide to pursue it further, if changes to Chapter 1 and 3 are not made.

10.0 MICELLANEOUS SUBMISSIONS – OVR 8

Mighty River Power submission

10.1 Section 2.6 of the Mighty River Power submission seeks consequential amendments to the proposed One Plan to ensure the full extent of relief sought in the submission is able to be given effect to.

10.2 No further submissions were received in relation to this request.

Comment on the Officer recommendations

10.3 The Officer report recommends that all submissions seeking consequential amendments be accepted in part, and reviewed as the One Plan hearings progress (as it is not possible at this point to know what consequential amendments will be necessary). I support this recommendation and note that Mighty River Power wishes to retain the opportunity to seek relief in connection with this submission, as necessary, in later hearings.

11.0 FURTHER SUBMISSION ON SUBMISSION BY LANDCORP FARMING LTD

Landcorp Farming Ltd's Submission

11.1 Landcorp Farming Ltd (Landcorp) has requested that none of the proposed provisions relating to regulatory controls on dairy farms or on the limitation of permitted water takes by dairy farms nor any revised provisions that may emerge in relation to agricultural activity, be agreed or implemented in the absence of a robust cost benefit analysis having been completed and used as the basis for informed stakeholder consultation.

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- 11.2 The reason for Landcorp's submission is that while the One Plan Section 32 evaluation has recognised the benefits of its provisions it has failed to adequately consider the costs to dairying and the dairy processing sector associated with complying with the proposed One Plan provisions.

Mighty River Power's further submission

- 11.3 Mighty River Power has opposed this submission because, in broad terms, the the One Plan should establish a regulatory framework that has appropriate regard to all sectors of the community and the provisions of Part II of the Act. In particular, Section 7 (j) of the RMA requires that all persons exercising functions and powers under the Act shall have particular regard to the benefits to be derived from the use and development of renewable energy.
- 11.4 Further, Mighty River Power is concerned that Landcorp's intent is to seek One Plan provisions which unduly and inappropriately emphasise the needs of dairying and agricultural users at the expense of other users which may generate equal or more significant benefit for the community.

Comment of the Officer Recommendations

- 11.5 The Officer report recommends that both the Landcorp submission and the further submission of Mighty River Power be accepted in part and that changes not be made at this point. I agree with this view and agree that Council need not undertake a regional level, quantitative social or economic cost benefit analysis of the whole plan. Section 32 does not require a quantitative economic cost benefit analysis of resource management documents. It does not require a detailed audit type process in which each provision is rigorously evaluated in terms of their financial costs and benefits.
- 11.6 The term 'benefits and costs' as used in the context of the RMA, are intended to be much broader than just economic implications of provisions. In evaluating the efficiency of provisions, Councils are required to consider not only economic matters but the full breadth of social and environmental, as well as economic, benefits and costs. A section 32 evaluation which focuses on the economic implications of proposed provisions for one sector of the economy would not be consistent with the requirements of the RMA.
- 11.7 In this context Council's commissioning of more detailed evaluations of the benefits and costs of particular provisions or packages of provisions is entirely

appropriate (see pages 15-16 of the Section 42A report by Phillip Percy). I understand that such evaluations will be presented at the hearings on the relevant One Plan chapters.

12.0 CONCLUSION

- 12.1 In conclusion, the Hearing Panel will recall that Part One of my evidence provided the context for Mighty River Power's submissions on the One Plan and in particular on the RPS. I discussed the purpose of regional policy statements, the legislative context of the RMA more broadly, and the national policy context.
- 12.2 In doing so, I concluded that regional policy statements have a very important and particular role in the resource management policy hierarchy. This is to provide an overview of the resource management issues facing the region and to provide a regional level policy direction for addressing these issues. This is quite different to the role of regional and district plans.
- 12.3 I also emphasised the enabling presumption in the purpose of the RMA and the need, inherent in the requirement for integrated management, to consider and explicitly recognise the competing values placed on the region's resources, including those associated with their use and development.
- 12.4 Finally, I outlined the growing body of national policy on energy and energy generation, which places significant emphasis on the value of renewable energy generation in the country's future development.
- 12.5 The Mighty River Power submission has been framed within this context and seeks amendments to the One Plan so that it better reflects it.
- 12.6 Part Two of my evidence discusses Mighty River Power's specific submission points and further submissions that are being considered by Council as part of the Overall Plan hearing. I consider that the relief requested in these submissions is consistent with the context described in Part One of my evidence and with the purpose of the RMA.



Richard Zane Peterson
Associate/Planning Manager
Harrison Grierson Consultants Limited
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