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**FORM 3:**

**Submission on Proposal for National Policy Statement for Freshwater Management**

Section 49 of the Resource Management Act 1991.

To: the Chairperson  
Board of Inquiry

This is a submission on the following proposed national policy statement (the proposal):

**Proposed national policy statement for freshwater management**

The specific provisions of the proposal that our submission relates to are:

- The complete proposed National Policy Statement
- The Section 32 Evaluation, Appendix A
- Policy 3 and 8

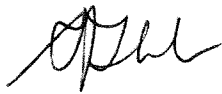
Our submission is:

- Central Hawke's Bay District Council (Council) supports Local Government New Zealand's (LGNZ) submission on this National Policy Statement.
- Council has major concerns about the resourcing requirements that implementing this National Policy Statement (NPS) would require:
  - a. Council believes that nationally there is a severe shortage of qualified people to carry out the requirements, in particular qualified and experienced planners to implement the Regional and District Plan changes, and qualified and experienced scientists to gather environmental information and assess that information to determine, for example, "notable values of each freshwater resource" and "the value of swimmability". **Before deciding whether to put the NPS into effect, central government should ascertain the availability of qualified and experienced staff nationally to determine if sufficient resources exist to implement this national policy statement**
  - b. The Section 32 Evaluation suggests the cost to local government of implementing this NPS to be \$101,250,000 (one hundred and one million two hundred and fifty thousand dollars). Central government goes to great lengths to rebuke local government for the level of rate increase needed to provide the levels of service determined by our local communities through a thorough consultative process with those communities. Central government now proposes to pass on extra costs to

local government to implement this policy and other policies being promulgated at this time. The passing of cost by central government to local government to implement central government's policies is unacceptable. **If central government wants to implement this national policy statement, then central government should fund the full costs incurred by local government for the implementation and ongoing provision of this national policy statement.**

- The timeframes for preparing District Plan changes are virtually unachievable, and would require intense resourcing at high cost. For example, for each Regional Plan change in Hawke's Bay four District Plan changes would be needed, with duplication of resources all required at the same time. **District Plan changes to meet this NPS should be included in other changes or reviews, with an option to require that the proposed change must be notified within one year of the Regional Plan change being adopted.** This would give Council the opportunity to include a change when it might be making other District Plan changes but at least give a realistic timeframe if the change is notified as an individual plan change, thus reducing cost and allowing better allocation of resources.

I do not wish to be heard in support of my submission.



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