

Policy 2.

51. 2(b): In general terms, the requirement to have all of the details of a regional plan change ready 40 days after the RPS is notified, seems unrealistic. The final details of the revised RPS will not be known in full until the notification, and it is hard to see how compatible plan variations can be ready in this time frame.
52. 2(c) (i): There is a clear need for industry good practice to be defined and be clear if a plethora of different regional council definitions is to be avoided. The BOI should note that the PSWP has an activity on-going to address this issue.

Policy 3.

53. The timetable for preparation of variation to district plans to comply with the revised RPS is even more challenging than for regional plan compliance. There can be little confidence that this will happen.

Policy 4.

54. This is a reasonable set of guidance material in that it behoves the regional council to take specific account of a range of community values in plan preparation.

Policy 5.

55. The guidance material for district plans is less holistic than that given under Policy 4, whereas much is as relevant to district council responsibilities in the social and economic areas.

Policy 6.

56. This policy gives some guidance as to the use of resource consent conditions to achieve the objectives. The sections (a) to (e) really not needed because any resource consents issued have to take account of RPS and RP requirements, which are more comprehensive than these sections. A simple statement that all resource consents issued shall comply with the NPS would suffice.

Policy 7.

57. This looks like a back door way to link resource consent conditions and payments by applicants. It is used in district plan rules on land subdivision, but opens up the opportunity for regional councils to derive revenues from the consenting process – the RMA is about minimising effects on the environment that often requires associated costs for so doing to be sheeted home to the applicant – financial contributions to regional councils is outside the intent.

58. Relief sought.

The proposed policies under the PNPS should be revised to accommodate the issues and concerns raised above.

Conclusions and Recommendations

59. Restated in line with INZ suggestions, the Objectives in the PNPS are generally laudable and supported.

60. The related Policies are unlikely to realise the Objectives and the costs will be high

61. Limitations to the present RMA processes are highlighted by the PNPS exercise.

62. Central Government will have to provide guidance and financial resources to regional and district councils if this PNPS in its present form is progressed.

63. The review of the PNPS has highlighted the need for long term water resource development in addition to the current focus on water resource management and control of land development.

64. **INZ recommends that:**

(a) The PNPS as it stands be withdrawn.

(b) An alternative PNPS be developed that reflects the submissions received and the plans for related developments in RMA reform and institutional restructuring.

(c) The BOI continues the process using the revised PNPS after drafting.

(d) Government addresses the need for a national viewpoint initiative in long term water resource development