



Environment Network Manawatu submission to Horizons Regional Council Draft Annual Plan 2016-2017

12 April 2016

Horizons Regional Council
Private Bag 11025
Manawatu Mail Centre
Palmerston North 4442.

Dear Horizons Regional Council,

Environment Network Manawatu (ENM) thank you for the opportunity to submit on your draft annual plan 2016-2017.

Background on Environment Network Manawatu

ENM is a charitable umbrella organisation representing around 45 active member organisations in the Horizons region. Water quality and biodiversity are the leading issues for the largest sub-network of these groups, along with soil quality, watershed protection, carbon sequestration, and sustainable transport for improved air quality and climate change mitigation.

Submission on Regional Growth & Regulatory Role – General Comment

ENM believes that HRC plays one major and critical role in regional prosperity: **HRC's role is to serve as the watchdog and regulatory agency** essential to ensuring that our natural resources of soil, water, air, and biodiversity are sustained and enhanced for the long-term prosperity of current and **future generations**.

We are deeply concerned with what the Draft Annual Plan's discourse of "regional growth" might signal in terms of a conflict of interest with its regulatory role, and with how an *a priori* growth-orientation might undermine the real wealth (a.k.a. "natural capital") of our region, to the detriment of generations of humans and also other species. We submit that HRC should position itself as neutral to growth and neutral to economic prosperity, especially when prosperity measures only account for current generations. A neutral position allows HRC to choose when and where to partner or to regulate on the basis of its role in protecting and enhancing the environment.

However, we see an opportunity for Council to go beyond business-as-usual and help industry and farming to come up with new opportunities and income streams that either: (1) work within nature's capabilities; or (2) take a restorative approach. Tararua's Go initiative provides a very nice example on how councils can help constituents identify new opportunities for sustainability and diversification.

For example, ENM value HRC's role in the Te Āpiti Project, which has tourism potential. HRC's bottom lines in the Te Āpiti Project need to be, firstly, conservation outcomes for intrinsic reasons and, secondly, conservation outcomes for strategic reasons, such as considerations of how sustained and enhanced environmental integrity are essential to eco-tourism over the long-term. Other Te Āpiti Project partners can promote tourism, while HRC monitors and ensures that such tourism has net positive environmental outcomes.

Similarly, ENM support projects that work in partnership with farmers and others to promote environmental outcomes such as watershed restoration, soil and water quality improvements, increased habitat for native birds and pollinators, increased carbon sequestration in soil and native bush, and reduced food transport miles by increasing the availability of diverse local foods. We think it would be excellent if partnerships support the economic prosperity of farmers and industry. However, we submit against HRC making prosperity a primary goal rather than a side effect of promoting better farm management for environmental outcomes.

Where Horizons enters into partnerships with other organisations, we submit it should do so in ways that make environmental outcomes its end goal, with any economic outcomes being a means-to-an-end from HRC's perspective. Environmental and economic objectives need not be in conflict. However, HRC's role is to regulate. To ensure that it is able to fulfil its regulatory role, HRC should adopt robust monitoring programmes for environmental outcomes, as well as transparent procedures for conflict of interest management.

The discourse of economic prosperity and regional growth is inappropriate if it comes at the cost of weakening HRC's priority role to regulate and develop programmes with good environmental outcomes.

Submission on HRC's Regulatory Role and the One Plan

Environment Network Manawatu submits that the regional council's track record with respect to One Plan implementation is good cause for doubting the quality of its outcomes monitoring and conflict of interest management.

In particular, we note that there has been recent Environment Court criticism of HRC delays in requiring and processing consents for waste-water discharges (i.e. the Feilding WTP decision). HRC also needs to speed up its implementation of the One Plan with respect to farm nutrient management in targeted catchments.

We see that the current draft plan includes a reduction in the monitoring budget of \$118,000 against the budget for year 2 outlined in the Long Term Plan. We submit that HRC's annual plan and budget need to support better monitoring outcomes.

We are additionally concerned by the \$78,000 draft plan reduction in the community relations budget, which has been used to support farmers in managing nutrient reductions as required by the One Plan (Supporting Document pp79-81). To the extent that this community relations work does in fact reduce non-point-source discharge into the Manawatu River and tributaries, we submit it should be retained; if the programme is ineffective, the money needs to be spent in another way that reduces non-point-source discharge.

Submission on Changes to Transport

ENM are pleased to see steps taken to make good, data-driven decisions around the best ways to increase the use of public transport. Any steps to ensure active and public transport become the most convenient transport options are welcome. We note that there are important threshold effects with respect to increasing the frequency of public transport and the availability of safe and convenient active transport routes. With respect to the public transport system, there are certain threshold levels of comfort, convenience, information, and routine that must be provided before people's preferences will change. Data collected on sub-optimal service levels would be a poor indicator of demand for good service.

We note that if HRC were to match PNCC contributions to data collection (\$25,000), there would be funding available for further research should questions arise out of the first round of data collection. We submit that getting public transport right is worth the expense.

In regards to the Te Āpiti Gorge Project and its wider spin-offs, we would like to stress the need for HRC to promote a safe river crossing for pedestrians and cyclists between Ashhurst and the Gorge, working with NZTA as outlined in the Regional Transport Plan.

Submission on Changes to River Schemes

ENM members have provided particularly impassioned comments against what HRC calls "river control" and what some of our members call "costly band-aids."

We submit that HRC can do more to adopt international best practice in flood management. HRC control-oriented drainage schemes are financially costly and require constant and ever more extreme maintenance to raise stop banks and de-silt rivers. The built-infrastructure approach is neither sustainable nor ecologically sound, and it has been proven ineffective, time and time again, at providing good social, economic, and environmental outcomes. This control-oriented approach hasn't been good enough under historic conditions, and, with climate change, it is now quickly becoming even worse.

We submit that HRC should be investing heavily in restoring the upper watershed, holding water in tributaries, and providing the lower river with a sufficiently ample floodplain. We are supportive of the SLUI initiative but we submit that a target of 30% sediment reduction by 2043 is too little and too late. We recommend that, as part of the Manawatu River Leaders Forum Action Plan, HRC set bolder targets, share modelling done by Landcare Research, and also engage in a wider public discussion about the continued use of willows and poplars for erosion control.

Submission on biodiversity

ENM are opposed to the \$47,000 reduction in the 2016-17 biosecurity and biodiversity budget as compared to the LTP for Year 2, especially when the 2014-15 expenditure indicates that at least \$211,000 over plan has been required (Supporting Documentation p.68). HRC effort is just not good enough given the challenges around weed and pest control and preserving our living heritage.

We are additionally concerned that the LTP calls for the disestablishment of a biodiversity role in 2017-2018. We are in favour of keeping this position in 2016-2017 and into the future. We submit that HRC should start planning now for the steps it will take to keep this role in place. Biodiversity has intrinsic value in itself, and the ecological evidence is clear that it also

plays a critical role in ecosystem resilience (and in social-ecological system resilience). HRC should not be planning to step backwards next year.

Closing

Thank you for the opportunity to submit. We ask that HRC step up as the leading agency necessary for ensuring environmental integrity in our region.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Helen Lehndorf', written in a cursive style.

Helen Lehndorf, Co-Chairperson
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