



Environment Network Manawatu
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28 April 2016

Manawatu District Council
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Submission on MDC Annual Plan

Environment Network Manawatu thanks you for the opportunity to make a submission based on MDC's Annual Plan Consultation Document. Our submission has several parts as follows:

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1.0 About Environment Network Manawatu

Environment Network Manawatu (ENM) is a charitable umbrella organisation dedicated to enhancing the Manawatu environment. We receive funding from PNCC, Lotteries, Eastern and Central Community Trust, Community Organisation Grants Scheme and project funding from additional organisations. We currently have 47 active member groups, 14 of whom are currently based in and/or routinely active in the Manawatu District.

This submission has been written on behalf of our member groups and incorporates comments on the plan from our member groups.

2.0 General Comments

ENM fully understands that council planning requires a careful balance between appropriate rating and necessary expenditure to maintain and improve council assets and services to an acceptable standard for its community.

ENM would like to emphasise through this submission that environmental sustainability drives the other two goals of social-cultural and economic sustainability, because the environment is the foundation and context for where we live. ENM would like to emphasise some key points as follows:

- Across Europe, North America and Australia, those cities and towns that have chosen to invest in a transformative approach to sustainability have become most desirable places to live, and those with the earliest start down this pathway now have proven to attract new entrepreneurial activity, often of the low-impact, professional variety that has the flexibility to relocate anywhere.
- Active transport, when safe enough to counteract the risk of accidental injury, has proven health benefits that reduce the costs of the public health system.
- The health benefits of clean air and water accrue to everyone.
- Studies are now even quantifying the positive health impacts of access to natural environments¹.
- Our region's indigenous culture is rooted in the environment. Cultural and ecological health are highly connected.
- Our general support for MDC's direction as identified in your consultation document is tempered by our desire that MDC do more to become a leader in sustainability. We submit that this requires more action than is currently planned to reduce our ecological impact and to support environmental restoration.

¹ *As just one of several possible examples, a study from the Universities of Edinburgh and Glasgow recently found that access to parks is a key measure for lessening the gap between the quality of life of those with disparate incomes. See Dugan, Emily. 22 April 2015. "Living Near a Park Leads to a Better Life -- Study." The New Zealand Herald. Online.*

http://www.nzherald.co.nz/health/news/article.cfm?c_id=204&objectid=11436346.

Accessed 24 April 2015. Other studies point specifically to the benefits of access to forests.

In so many ways, the Manawatu District is an ideal place to live and work. We ask for bold leadership to make the most of the district's environment by re-assessing how the principles of sustainability can be woven into **all** aspects of council business, and by accordingly prioritising spending to achieve this goal.

Toward this end, we applaud steps that Council is already taking, including cycle way additions and support for biodiversity projects such as those at the Kitchener Park.

Yet we submit that much more is required, especially in terms of improvements to water quality (wastewater, storm water and catchment care) and more extensive support of, and quicker change toward, a safe, convenient, and attractive integrated transport system.

The potential benefits of stronger leadership for sustainability are significant and enticing. A city that innovates to transform itself for ecological sustainability will quickly become, in the fullest sense, a wealthy city.

3.0 Specific Comments – Reprioritised spending

3.1 Feilding Wastewater Treatment Plant

After the Environment Court decision, Manawatu District Council needs to come up with an improved work plan for dealing with Fielding's wastewater. It needs to take a wider view - from decreasing wastewater generation to achieving higher standards of treatment and to using as much of the wastewater as possible for beneficial use on land.

Seven million litres of wastewater per day from a township the size of Feilding (as identified in your Long Term Plan documentation in 2015) is excessive and ENM would seriously suggest that MDC look to putting together a Water and Wastewater Minimisation Plan and Fund to help incentivise existing industry and residents to reduce the amount of wastewater that ends up at the plant.

There are several ways existing industry and residents could reduce wastewater volumes and improve its quality, from the simple installation of a dual flush toilet, through to the more advanced grey water separation and disposal or reuse of site treated industrial water where appropriate. A spin off effect of reducing wastewater volumes is that you tend to also get a reduction in the amount of water consumed as well – reducing the future stresses on potable water infrastructure and creating savings for council.

Council also needs to ensure that their sewerage infrastructure is well maintained and that any infiltration of stormwater is eliminated. MDC's infrastructure strategy suggests that more than 50 kilometres of wastewater pipeline is in a poor or very poor condition (Page 140 of the Long Term Plan Supporting Information - Section Three). This should be a high priority for council to deal with.

Also, council should be looking at ways to make sure that any new built infrastructure (residential, commercial and industrial) is having a minimal impact on quantity and quality (particularly of heavy metals) of wastewater ending up at the treatment plant.

By moving the Feilding Wastewater Treatment Plant liquid component towards a complete discharge to land, MDC also gets in the enviable position of not needing to treat the wastewater as intensively and removes the costs associated with additional treatment upgrades. A good example of this is both nitrogen and phosphorous removal, which generally involve ongoing operational costs and/or consumables, which would not seem like a good use of ratepayers money when these nutrients are beneficial to growth of crops when applied to land.

ENM notes that nitrogen removal infrastructure is included in the planned projects for 2016/2017. Would this become redundant infrastructure if MDC manages to decrease wastewater volume and improve its quality via wastewater initiatives that occur before the Treatment Plant?

3.2 Water Treatment Plant and pipe upgrades

Feilding's Wastewater Treatment Plant is a great example of an issue that gets exacerbated as a consequence of not dealing with things in a timely, comprehensive manner. We note that the plant's consent expired in 1999, and only short term-consents were granted thereafter and were intended to provide time for MDC to develop a more comprehensive strategy. This deferred action then leads to having to respond hastily to meet more rigorous consent requirements and costing the ratepayer significantly more than a continuous improvement approach.

MDC is now faced (p6) with a similar situation for its water supply piping from Almadale, having left it so long that it cannot extend their life by lining them, instead having to completely replace the pipes.

And we see a similar behaviour being continued in Sanson with the replacement of the water piping there being deferred so rates don't have to go up while obtaining a new water supply and storage system. Will this just result in the water distribution network renewal costing all the more in the future?

ENM believes that MDC need to take a more forward-looking approach to asset management and to either borrow to fund works in a timely way or, if MDC doesn't like to take on debt for long-term

essential infrastructure, to add an extra amount to rates to create a ring-fenced replacement fund. The current system of collecting rates for depreciation doesn't adequately account for the higher standards that are required of infrastructure over time and so may not collect enough to pay for the new infrastructure that is needed when the old gets near to the end of its life or end of its consented period.

3.2 Resource Recovery Centre

ENM is supportive of steps to divert more green waste and recyclables from the waste stream and back into beneficial use.

Some of our member groups have suggested that MDC consider additional options, for example the possibility of sharing facilities and services with Palmerston North City Council. We understand PNCC's facility is currently underused. Perhaps MDC could consider the comparative costs (10, 25, 50 year timeframe) of utilising the unused capacity at Palmerston North City Council's (PNCC's) facility?

3.3 Feilding Greenspine

ENM congratulates MDC for prioritising enhanced green space running adjacent to the railway line. As part of the works and developments of the bridge at the Makino Stream, perhaps council should start thinking about a catchment scale initiative within the Makino Stream as a way to provide additional green space, but also to improve the characteristics of the Makino Stream itself?

Providing funding towards an initiative like this would not only be a great example of Council's involvement in catchment scale initiatives that could be highlighted to the Manawatu River leaders, it could also be a direct input into the deliverables of the Oroua Catchment Care Group, which MDC supports.

4.0 Speaking to Our Submission and Contact Information

ENM would be happy to speak to our submission. Our ability to speak is quite flexible.

Please contact Sally Pearce at coordinator@enm.org.nz regarding speaking times and about who will be speaking for ENM. Sally can also be reached at the ENM office on 06 355 0126.

ENM is happy that this submission will be regarded as being publicly available, including placement on the Council's website. We do not request that our contact details be regarded as confidential.

5.0 Closing

Thank you for the opportunity to make this submission. We are very interested in further developing our relationship Council and appreciate the invitation to participate in local decision-making.

Kind regards,



Alastair Cole
Co-Chairperson
Environment Network Manawatu