



Environment Network Manawatu
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Manawatu District Council
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Submission on PNCC 10 Year Plan 2015-25

Environment Network Manawatu thanks you for the opportunity to make a submission based on MDC's Long Term Plan 2015-25 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 in response to initial comment on the plan from our member groups. It has been revised in response to further member group feedback.

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 bolder leadership to make the most of the district's environment by seriously re-assessing how the principles of sustainability can be woven into **all** aspects of council business, and by accordingly reprioritising spending goals over the next 10-year period.

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 – Key Questions

3.1 Economic Development

ENM remains neutral on this question. We agree with the concept of combining tourism and economic services from one Council Controlled Organisation, along with Palmerston North City Council, as tourism services directly link with developing regional economies and so it would make sense to have these two services integrated.

However, we've also had some feedback that Feilding Promotions has achieved a lot for the district and there is concern that losing this organisation could be a step backward for the district. Whatever organisation is in this role, it would be important to maintain existing levels of service and for the organisation to be responsive to the needs and aspirations of the local community.

3.2 UFB Industrial Rate

ENM supports the rollout of UFB to business – however, care needs to be taken to make sure that those who gain benefit from having this service are the ones who pay. A question needs to be asked about the inclusion of Manfield Park into the UFB rollout, as this may tie directly into the type of exhibits that may be able to be used at Central Districts Field days (for example) which may have a wider reaching district benefit than just the affected businesses themselves. ENM would therefore suggest a mix (possibly 50/50) of targeted rate and uniform rating across the district for this service.

3.3 Community Development Funding

We respect Council's preference to reduce the amount of money provided by the Community Development Fund, as a way to provide a small relief to the districts ratepayers given the rates increase as proposed.

However, ENM would suggest that reducing the amount provided in this fund is short sighted, given the huge value that community groups and not for profit organisations play

within our communities and the relatively tiny cost saving associated with this (current funding is just 0.5% of the total operational budget). The contribution that community groups make to the overall wellbeing of the community is immense. This should be an area of funding growth for every district and city in New Zealand, as it actively promotes a spirit of volunteerism, active citizenship and community service.

ENM advocates for additional spending on the community sector that is actively enhancing your districts environmental, social, cultural and economic wellbeing. We would suggest that although MDC is going through a period of intense capital upgrade, the overall strategy should be to at least maintain this fund initially and then increasing the amount provided to this fund annually over the term of the plan.

ENM does support the need for accountability with any funding provided and would hope that, with a maintenance of funding at the same level, MDC's new approach of partnering with community groups will lead to an increase in the level of service to the district's communities.

4.0 Specific Comments – Ongoing Commitments and Projects

ENM will also provide specific comments about areas of organisational interest as follows:

4.1 Growing our District

ENM notes from the Horizons Regional Council's draft LTP 2015-2025 that the Central New Zealand Agribusiness Strategy is to be completed June 2015 – a plan that aims to take opportunities identified from the Regional Growth study and to put them into practice "within environmental limits". ENM is concerned to read Horizons Regional Councils draft LTP that collectively local councils "see significant advantages in building on our agribusiness base and **aim to double the region's agribusiness exports by 2025.**"

ENM is concerned about what local councils define as 'agribusiness'. If it refers to all agribusiness, including the agricultural support industry (machinery, engineering, distribution, consultancy, value added processing, contracting etc), ENM would be supportive of this aim. However, aiming for this growth through increases to primary production (more of the same) over a relatively short time frame is another matter that ENM would strongly oppose. What is the proposed process to try and entice high value (or value added) enterprise rather than low value, high volume production increases that degrade our region's environment?

We need to discourage intensive land use on land that is unsuitable and to make sure that primary production becomes 'tailored' to the types of soils and landscapes our region has to offer – making sure we utilise our good classes of land well (cropping, horticulture, dairying). There is also potential to increase high value crops/products in the region that also support biodiversity outcomes (e.g. manuka or kanuka honey production).

If we were to do this tailoring we may be able to enhance primary production within the region without effects, but we would need to do this at an appropriate pace and with appropriate monitoring. 2025 is much too soon and not a smart target when considering that we are spending millions regionally trying to clean up our past environmental mistakes.

We would seriously suggest that MDC think very carefully about how the stresses any growth plans of the district are going to have on its districts environment - the platform for economic, social and cultural wellbeing of your ratepayers.

4.2 Feilding Wastewater Treatment Plant

We congratulate MDC for taking a proactive approach to dealing with Feildings Wastewater Treatment Plant and moving toward a discharge to land – which is the only good environmental solution for the liquid waste from this plant.

However, we understand that the resource consent that is currently being appealed will result in only 20% of the discharge going to land, with the remaining being discharged into the Oroua River. ENM urges council to reconsider this approach and believes that 20% is much too little a diversion. We would like MDC to consider ways to divert a higher proportion of treated wastewater to land and would like MDC to keep moving strategically toward eliminating this discharge from the river altogether through the adoption of a Water and Wastewater Minimisation Plan. ENM notes that MDC put together a Waste Management and Minimisation Plan in 2010 and considers that not including all waste streams, including wastewater from town sewerage, into this plan was an oversight.

Seven million litres of wastewater per day from a township the size of Feilding is excessive and ENM would seriously suggest that MDC look to putting together a Water and Wastewater Minimisation Plan and Fund as part of the 2015-2025 LTP, 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, 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 LTP Supporting Information - Section Three).

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.

Dealing with the solid sewage waste must also be considered. The sending of this to landfill is not only completely unsustainable, but also devalues a potentially valuable resource of

carbon and nutrients that should be being utilised domestically and commercially. MDC must look at ways that it can effectively process this waste to make products that can be spread to land or sold into the future.

ENM would like to make sure MDC keep their district's rivers in the front of their mind. A vibrant river is a recreational, sporting, and tourism asset: for swimming, for boating, for fishing, and more, but only if the river is fit to visit. In addition, the holistic value of the river is much more extensive than these listed features, and far outweighs any built asset. Furthermore, a healthy river can sustain itself if treated appropriately, unlike a built asset. To call river enhancement a good investment is an understatement.

Finally, ENM submits that council should look to instigate a strategic timeframe in which council plans to remove its discharge from water. A suggestion from a member group was 5 years in which to develop plans and 5 additional years to implement.

4.3 Almadale Water Treatment Plant

ENM supports the upgrade of the Feilding Reservoir and trunk main, given these are critical pieces of infrastructure to Feilding township. To reduce stresses on potable water infrastructure into the future and to ensure we are looking carefully about how we use water efficiently within our towns, ENM submits that MDC should thinking carefully about incentivising the use of water saving devices (rainwater tanks, dual flush cisterns and grey water systems) within existing houses. This should be done through a Water and Wastewater Minimisation Fund. Water saving devices should also become mandatory for all new builds.

4.4 Manawatu River Leaders Accord and Horizons One Plan

ENM fully supports the projects that MDC are currently working on to meet the ambitions and requirements of the Manawatu River Accord and the One Plan. ENM would like to see MDC becoming more involved with projects and works in addition to wastewater treatment and disposal, by providing funding or subsidies to groups or individuals within the district that are working on the biodiversity, erosion prevention and catchment care elements of the Accord.

4.5 Feilding to Palmerston North Cycleway

ENM fully supports the development of this cycleway and congratulates MDC for being involved and putting funding together for this project.

4.6 Feilding Cemetery Extension

ENM would like MDC to seriously consider providing areas for natural burial within its district. Current methods of burial have long-term negative impacts, such as toxic loading of the soil from embalming fluids and the inability to ever use the land for other purposes. We advocate for the establishment of natural burial cemeteries as the increasing norm, and respectfully submit that MDC should be looking at this seriously for its district.

5.0 Specific Comment - Savings MDC has made

ENM would like to reiterate that reducing the Community Development Funding is short sighted and not a saving in the long term. We submit that MDC should maintain this funding (at minimum) in the interim, but looking to increase this funding within the LTP period.

6.0 Specific Comments - How much does it all cost?

ENM will also provide specific comments about areas of organisational interest as follows:

6.1 Reorganisation

ENM commends council for restructuring its organisation with a goal of improved service and consultation for its community. Finding the balance between services and appropriate rating will always be a balancing act. ENM supports MDC in its decision to increase rates to provide the necessary staff and services to its community.

6.2 New and improved services

ENM supports increased budgets for several of your projects, particularly for the Awahuri Forest/Kitchener Park Trust.

ENM commends the efforts of all parties involved (including councillors and staff) in the establishment of the Kitchener Park Trust and we are watching with interest to see how the Trust progresses with the enhanced management of this area.

7.0 Speaking to Our Submission and Contact Information

ENM would like 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.

8.0 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, Chairman
Environment Network Manawatu