30 October 2019

Freshwater Submissions  
Ministry for the Environment  
PO Box 10362  
WELLINGTON 6143

Emailed to: consultation.freshwater@mfe.govt.nz

Attn Hon David Parker, Minister for the Environment; Hon Damien O’Connor, Minister of Agriculture; and Hon Nanaia Mahuta, Minister of Local Government

Dear Sir/Madam

Submission from the Manawatū District Council on the Action for Healthy Waterways consultation document

Thank you for the opportunity to make a submission to the national direction for essential freshwater, as notified in the “Action for healthy waterways” document. The Manawatū District Council’s submission fully endorses the submission prepared and lodged by Local Government New Zealand (LGNZ). The Manawatū District Council also supports the submission prepared and lodged on behalf of the Manawatū-Whanganui Regional Council (trading as “Horizons”).

In addition to our endorsement of the LGNZ and Horizons submissions, this submission outlines the importance of the Agricultural Sector to the economy of the Manawatū District, potential impacts of package of reforms on the Manawatū District Council and Council’s commitment to improving water quality. While the Manawatū District Council is generally in support of the intent of this national direction, we are concerned that if implemented as currently drafted, the proposals have the potential to adversely affect the Manawatū District economy and the economic and social wellbeing of residents.

Manawatū context

The Manawatū District covers 256,693 hectares and stretches from Rangiwahia in the north to Himatangi Beach in the south and the boundary with Palmerston North City. The western boundary of the District follows the Rangitikei River and the eastern boundary is the Ruahine Ranges.

The resident population of the Manawatū District was estimated at 31,700 at 30 June 2019 and is forecast to grow to 40,324 people by 2048. Over half of the District’s population currently resides in Feilding, with 16,260 residents in 2016. The proportion of the population aged 65 years and older is forecast to increase significantly in the long term to approximately 17.8% of the total population in 2018 to 28.1% in 2048.
The local Agriculture sector

The agriculture sector is incredibly important to the Manawatū District economy. In 2018 the agriculture, forestry and fishing sector directly contributed $182m and 2,095 jobs to the Manawatū economy. This is 18.8% of total Gross Domestic Product (GDP) and 18.3% of all jobs. Sheep, beef, cattle and grain farming and Dairy Cattle Farming are the largest agri-sectors, collectively contributing $139.6m and 1,445 jobs to the district (refer to Table 1 below).

Table 1

<table>
<thead>
<tr>
<th>Sub-sector</th>
<th>GDP $m</th>
<th>Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheep, Beef Cattle &amp; Grain Farming</td>
<td>6.6</td>
<td>150</td>
</tr>
<tr>
<td>Dairy Cattle Farming</td>
<td>58.8</td>
<td>717</td>
</tr>
<tr>
<td>Forestry &amp; Logging</td>
<td>80.8</td>
<td>728</td>
</tr>
<tr>
<td>Agriculture Support Services &amp; Hunting</td>
<td>5.6</td>
<td>137</td>
</tr>
<tr>
<td>Horticulture &amp; Fruit Growing</td>
<td>12.1</td>
<td>37</td>
</tr>
<tr>
<td>Poultry, Deer, Other Livestock Farming</td>
<td>0.0</td>
<td>0</td>
</tr>
<tr>
<td>Fishing &amp; Aquaculture</td>
<td>17.6</td>
<td>326</td>
</tr>
<tr>
<td></td>
<td>182.0</td>
<td>2,095</td>
</tr>
</tbody>
</table>

This economic impact grows considerably when we consider the multiplier benefits of the sector. Estimates from 2018 indicate that for every $1 of GDP contributed from the industry, a further $0.53 of GDP is generated within the local economy and for each person directly employed, a further 0.56 of a job is created across other sectors.

Impacts on the Manawatū District Council

The proposals will impact on numerous ways on the Manawatū District Council. Based on the information contained in the discussion document “Action for healthy waterways,” the draft National Policy Statement for Freshwater Management, the Proposed National Environmental

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1 This data is based on information contained in the Agri-food Sector Input-Output models provided by the Manawatū District Council and Butcher & Partners Ltd.

2 The multipliers calculated from the Input-Output models are based on the structure of the agriculture, forestry and fishing sector in the region as at March 2018.
Standards for Freshwater and the Draft Stock Exclusion Section 360 Regulations, we anticipate the following impacts:

1. Additional resourcing needed to meet new risk management and reporting requirements as a wastewater and stormwater network operator. This will direct resources away from BAU activities.

2. Additional resourcing needed for re-consenting of wastewater and stormwater discharge consents in anticipation of stricter conditions around discharge quality.

3. Additional resourcing will be required to meet stricter measures and targets within the 10 Year Plan for Council’s stormwater and wastewater networks.

4. The need to implement stricter controls around land use activities within proximity of drinking water sources.

5. Council may be further limited in what productive land uses may be carried out on land that receives irrigated treated wastewater from wastewater treatment plants due to new controls around intensive farming land uses.

6. The need to review urban design standards, District Plan rules and structure plans to ensure that plan change and resource consent applications give adequate consideration to the requirements of the revised NPS-FM.

7. Resourcing needed to respond to customer enquiries regarding the new requirements.

8. Potential for ‘trickle down’ effects from the suite of rules that will be imposed by the Regional Council.

**Additional Comments**

The Manawatū District Council is committed to doing our part to improve the health of our waterways. The Manawatū District Council is a signatory to the Accord of the Manawatu River Leaders’ Forum. The main goal of the Accord is:

"Our goal is to improve the Manawatu River, the mauri (life force) of the Manawatu River Catchment, such that it sustains fish species, and is suitable for contact recreation, in balance with the social, cultural and economic activities of the catchment community."

As a signatory to the Accord, the Manawatū District Council committed to the key action of addressing the occurrence of toxic levels of ammonia downstream of the Manawatu wastewater treatment plant at Feilding. The upgrades to the Manawatu wastewater treatment plant have achieved reductions in ammonia and nitrogen levels and the irrigation of treated wastewater to land during low river flows in the Oroua River has reduced direct discharges of treated wastewater to waterways. The Manawatū District Council has also been acquiring additional land for treated wastewater discharge/irrigation in the long-term.

The Manawatū District Council’s 2018-2028 Long Term Plan includes details of the wastewater centralisation project to pipe untreated or pre-treated wastewater from the Villages of Halcombe, Sanson, Rongotea, Awahuri, Cheltenham and Kimbolton to the Manawatu wastewater treatment plant. Each of these villages currently has a wastewater treatment
plant with discharge consents that have expired or are due to expire in the next few years. There is limited suitable land currently available around the treatment plants for land-based irrigation of treated wastewater at Rongotea, Halcombe, Sanson, Kimbolton and may not be available at Cheltenham. The re-consenting of these treatment plants would therefore involve significant upgrades to achieve consistency with Policy 5-11 of the One Plan and to meet Council’s commitments to the Oroua River Declaration.

The volume of treated wastewater from the Villages will not affect the Manawatu wastewater treatment plant operations and the additional flow is within consented limits for the Manawatu wastewater treatment plant. The removal of direct discharges of treated wastewater in the Villages and the land-based irrigation of treated wastewater at the Manawatu wastewater treatment plant will mean that this project is an example of how the Manawatū District Council is contributing to improving surface water quality.

In summary, the Manawatū District Council’s is generally in support of the intent of the national direction for essential freshwater. However, the Manawatū District Council agrees with LGNZ that prioritisation, redesign and a staged approach to the implementation of the package are needed if the Regional sector is going to have the capacity and capability to deliver on that intent.

Thank you again for the opportunity to make a submission.

Feel free to contact me by phone (06 3230000) or email (Richard.Templer@mdc.govt.nz) if you have any questions regarding our submission.

Yours sincerely

Chief Executive

Personal details removed