
BEFORE THE MANAWATU-WANGANUI REGIONAL COUNCIL

in the matter of the Resource Management Act 1991

and

in the matter of the hearing of submissions to the Proposed One Plan –
 “Infrastructure, Energy and Waste” Section.

**SUBMISSION IN SUPPORT OF THE TERRITORIAL AUTHORITY
COLLECTIVE'S SUBMISSIONS**

BRADEN AUSTIN

Manager - Community Assets – Horowhenua District Council

Dated: 17 April 2009

INTRODUCTION

1. My name is Braden Austin and I have been employed by Horowhenua District Council (HDC) since September 2005.
2. I hold a Bachelor of Engineering (Civil) degree from Canterbury University, I am a member of the Institute of Professional Engineers New Zealand, I am a Chartered Professional Engineer and I hold a Masters of Business Administration (Technology Management) degree from La Trobe University in Melbourne. I have 17 years professional engineering experience, including 4 years in a private engineering consultancy and the remainder in local government in New Zealand.
3. I am the Chair of the Manawatu-Wanganui Regional Lifelines Advisory Group and I was the Project Manager for the Manawatu-Wanganui Regional Lifelines Project that was completed in 2005.
4. My core responsibility at HDC is Asset Management and this includes the management of the only territorial authority owned fully engineered modern landfill in the region.
5. In this matter I represent the Horowhenua District Council and the TA collective covering the districts of Horowhenua, Manawatu, Tararua, Rangitikei, Wanganui and Ruapehu (hereafter referred to as the TAs).

COMMENT

6. I agree, with Section 3.3 of the Officer's Report, that Infrastructure should be given special consideration within the One Plan and this is supported by the TAs submissions.

7. The Lifelines Project identified regionally significant 'engineering lifelines' infrastructure and assessed the risk to the community from failure of these in a range of natural hazards scenarios. The study did not include sanitary landfills because these are not 'traditional' engineering lifelines and they are not as vulnerable to the natural hazards considered. Nevertheless, sanitary landfills are essential infrastructure required for public health and environmental protection. The definition of 'Infrastructure' in the RMA does not appear to cover sanitary landfills or other solid waste and recycling facilities. I feel that the definition gap needs to be covered by the One Plan in order that this important community infrastructure is treated appropriately to enable provision, maintenance and upgrading (refer POP Objective 3-1).
8. There are only two fully engineered modern landfills (one of which is privately owned) in the region and it seems unlikely there will be more in the foreseeable future. I consider that reliable and secure waste recycling and disposal facilities are critical to the sustainable management of natural and physical resources within the region and that these facilities need protecting. To not protect these resources may well lead to excessive difficulties with renewal of consents with existing landfills and/or consenting of any new facilities. This would in turn lead to unnecessary costs on the community due to excessive consenting costs and/or reduced competition in that market.
9. I note that the Officer's Report recommends that the Glossary definition of Infrastructure be removed (to avoid a repetition of the RMA definition) and I am pleased to see the Officer recommends the expansion of the list of regional infrastructure contained in Policy 3-1. This largely addresses concerns the TAs have about critical infrastructure not being recognised. However, I observe that solid waste infrastructure is not included in this list. I think this is inconsistent. For example, liquid waste handling infrastructure in the form of sewerage systems and treatment plants are provided for, yet solid waste infrastructure is not. Including solid waste would also provide consistency with the Local Government Act, which defines "community infrastructure" as including landfills.
10. Six TAs have supported Transit's submission on the need for a proactive directive approach to strategic integration of infrastructure development and land use both at a district and at a regional level and remain convinced this is appropriate. Examples of positive combinations include electricity generation in close proximity to demand (minimising line losses), solid waste and recyclables haulage to well-located facilities (minimising transport energy usage), the location of industry, the location of airports away from residential areas but central to wider demand and other transportation links and commuter demand close to transportation nodes and hubs.
11. I remain concerned about the inclusion of liquid, gas and sludge waste in Policy 3-6 and the potential this has to unreasonably further complicate resource consent applications. Written as they are, Policies 3-6 and 3-7 would seem to require that every waste stream associated with a resource consent application must be subjected to the hierarchy, as part of the application, no matter how minor that waste stream is. For this reason, five of the TAs are supportive of point 32 of the PNCC submission (#241) to limit the coverage of policy 3-7 to "...where there

are significant environmental effects arising as a result of the proposed discharge...”. I submit this is necessary, or else applicants will be forced to undertake complex options assessments for even the most inconsequential discharges that have a single obvious solution of no more than minor environmental consequence.

CONCLUSIONS

12. In relation to points 6 to 9 above, I repeat the TAs’ requests that Policy 3-1 be amended to include:
 - “Solid waste infrastructure managed by local authorities”, and
 - “The existing lined landfills at Hokio (Horowhenua) and Bonny Glen (Rangitikei)”
13. In relation to point 10 above, I emphasise TA support for the Transit NZ submission # 336 and Palmerston North City Council submission # 241 seeking amendment of the proposed One Plan to achieve better integration of infrastructure with land use.
14. In relation to point 11 above, I emphasise TA support for point 32 of the PNCC submission (#241) to limit the coverage of policy 3-7 to “...where there are significant environmental effects arising as a result of the proposed discharge...”.

Dated 17 April 2009
Braden Austin