

21 OCT 2019  
~~06146~~

## Form 5

## Submission on notified proposal for policy statement or plan, change or variation

## Clause 6 of Schedule 1, Resource Management Act 1991

**To:** Horizons Regional Council**Name of submitter:** Palmerston North City Council, Manawatu District Council, Horowhenua District Council, Ruapehu District Council and Tararua District Council.

This is a submission on Proposed Plan Change 2 to the Horizons Regional Council One Plan.

**The specific provisions of the proposal that the submission relates to are:**

Proposed Plan Change 2 in its entirety.

**Palmerston North City Council's submission is:**

The territorial authorities of Palmerston North City Council, Manawātū District Council, Horowhenua District Council, Ruapehu District Council, Tararua District Council (The Combined Councils) have come together to provide a joint submission on Proposed Plan Change 2 to the Horizons Regional Council One Plan (PC2). The joint submission relates to the implications of PC2 and the One Plan for existing and future treated municipal discharges to land from the Councils' various wastewater treatment plants.

The following table lists each of the Councils' wastewater treatment plants (WWTP) and the receiving environments that they hold consents to discharge to.

Council	Wastewater Treatment Plant	Receiving Environment
Palmerston North City Council	Totara Road WWTP	Freshwater (Manawātū River) <sup>1</sup>
Manawatu District Council	Manawatu WWTP	Freshwater (Oroua River)
	Manawatu WWTP	Land
	Sanson	Freshwater (Piakatutu Stream)
	Sanson	Land
	Rongotea	Freshwater (Cambells Darin)
	Rongotea	Land
	Himitangi Beach	Land
	Kimbolton	Freshwater (unnamed tributary Oroua River)
	Kimbolton	Land
	Cheltenham	Freshwater (unnamed drain)
	Halcombe	Freshwater (Rangitawa Stream)
	Halcombe	Land
Horowhenua District Council	Awahuri	Freshwater (Bennetts Drain)
	Levin	Land (native forest)
	Shannon and Mangaore	Land (agriculture)
	Foxton	Piriharakeke (Foxton Loop). Consent granted to discharge to land (agriculture) to be implemented by 2020.

<sup>1</sup> Palmerston North City Council is currently undertaking an extensive and comprehensive review (the BPO Review) to determine the best practicable option for the treatment and disposal (including land disposal systems) of the city's treated wastewater

	Foxton Beach	Land (forest)
	Tokomaru	Centre Drain – Linton Drain. Council is commencing a project to remove land-based discharge
	Waitarere Beach	Land (forest)
Tararua District Council	Pongoroa	Freshwater
	Ormondville	Freshwater
	Norswood	Freshwater
	Ekatahuna	Freshwater
	Pahiatua	Freshwater
	Woodville	Freshwater
	Danniverke	Freshwater
Ruapehu District Council	National Park	Freshwater (Makaretu Stream)
	Ohakune	Freshwater (Mangawhero River)
	Pipiriki	Sub-surface irrigation to land
	Raetihi	Freshwater (Makotuku River)
	Rangataua	Wetland by the Manahuehue River
	Taumarunui	Whanganui River

The Combined Councils are concerned about the following matters and issues:

1. The implications of PC2 on existing consents for the discharge of treated municipal wastewater to land and any future consents for such discharges.
2. That while the One Plan sets a strong high level policy direction in the Regional Policy Statement of a preference for the discharge of treated municipal wastewater to land there is no direction in the lower order provisions (Regional Plan policies and rules) regarding how applications for these activities should be assessed and the standards and conditions that would be applied.
3. There is a lack of clarity regarding the extent to which other provisions in the One Plan could be applied to the discharge of treated wastewater to land. This is a particular issue where the discharge of treated wastewater to land is undertaken in conjunction with farming activities. PC2 provides an example of these issues including:
  - a. the extent to which the cumulative nitrogen leaching maximums contained in Table 14.2 would be applied to discharges of treated municipal wastewater to land where this activity is undertaken in conjunction with farming activities; and
  - b. the appropriateness of applying Overseer and the Table 14.2 limits to treated municipal wastewater discharges to land.
4. While PC2 is intended to only apply to existing intensive farming activities the proposed amendments to Table 14.2 will apply to any new discharges of treated wastewater to land that is undertaken in conjunction with:
  - a. sheep or beef grazing where the area of the land irrigated is over 4ha; or
  - b. an existing intensive farming activity in targeted Water Management Sub-zones.
5. Provisions in the One Plan and PC2 which are designed to manage other activities being applied to applications for discharges of treated wastewater to land. This could result in unintended consequences including putting barriers in place to the successful granting of applications for discharges of treated wastewater to land. These potential unintended consequences could be in conflict with and could well frustrate the policy direction in the Regional Policy Statement of a preference for the discharge of treated municipal wastewater to land.

6. Any future National Policy Statement for Highly Productive Land could also present future barriers to the discharge of treated municipal wastewater to land where this has the potential to impact on highly productive land. Therefore PC2 and the One Plan should not be constraining the ability to use land irrigate with treated municipal wastewater for productive purposes.

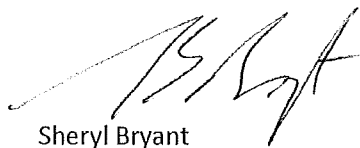
**The Combined Councils seek the following decision from the Horizons Regional Council:**

1. PC2 and the One Plan be amended to clarify that the intensive farming provisions of the One Plan including Table 14.2 do not apply to the discharge of treated wastewater to land including where this activity occurs on land used for grazing or in conjunction with other farming or intensive farming activities.
2. PC2 and the One Plan be amended to include a planning framework of appropriate policies, rules, assessment criteria and other methods to effectively assess applications for the discharge of treated municipal wastewater to land. These provisions should include recognition of the positive effects of changing or partially changing receiving environments from surface water to land for the discharge of treated wastewater and should facilitate applications that seek to change or partially the receiving environment for treated wastewater discharges from surface water to land.
3. PC2 and the One Plan should be amended to ensure provisions do not restrict the ability to use land irrigate with treated municipal wastewater for productive purposes.
4. Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.

The Combined Councils wish to be heard in support of the submission.

If others make a similar submission, The Combined Councils will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of submitters: Richard Templar, Chief Executive of Manawatu District Council, David Clapperton - Chief Executive Officer of Horowhenua District Council, Clive Manly - Chief Executive of Ruapehu District Council, Blair King - Chief Executive at Tararua District Council.



Sheryl Bryant

GM Strategy & Planning, Palmerston North City Council

Date: 21 October 2019

Electronic address for service of submitter: [Melaina.voss@pncc.govt.nz](mailto:Melaina.voss@pncc.govt.nz)

Telephone: 06 356 8199

Postal address: Private Bag 11034, The Square, Palmerston North 4442

Contact person: Melaina Voss, Wastewater BPO Manager (PNCC)



Request ID : 94365

Status : Open

Priority : Not Assigned

## Plan Change 2 Submissions

By Melaina Voss on Oct 21, 2019 04:09 PM

Due Date : N/A

To : submissions@horizons.govt.nz

## Description

Hello,

Please find attached a cover letter and two submissions to PC2. These are made by PNCC (individual) and joint submission prepared on behalf of Palmerston North City Council, Manawatu District Council, Horowhenua District Council, Ruapehu District Council and Tararua District Council.

The Submissions are signed by our GM Strategy & Planning who has delegated authority to submit applications under the RMA in absence of our Chief Executive (Heather Shotter).

Kind Regards  
Melaina

MELAINA VOSS | Wastewater BPO Project Manager  
Palmerston North City Council | Private Bag 11034 | Palmerston North  
P: +64 (6) 3568199 | [www.pncc.govt.nz](http://www.pncc.govt.nz)



Attachments : Joint PC2 Submission - SB Signed.pdf (769.40 KB)  
PNCC PC2 Submission - SB Signed.pdf (1541.15 KB)  
PNCC Cover Ltr PC2 - SB Signed.pdf (411.79 KB)

## Requester Conversations

System on Oct 21, 2019 04:09 PM

To : melaina.voss@pncc.govt.nz

## Summary

Thank you for contacting us (++RE-94365++ Plan Change 2 Submissions)

## Description

## Thank you for contacting Help

Your request regarding "Plan Change 2 Submissions" (94365) has been received.

You can add details to your request by replying to this message.

Thanks

Help

Michelle Whare on Oct 22, 2019 07:52 AM

To : pen.tucker@horizons.govt.nz

## Summary

Plan Change 2 Submissions (++RE-94365++)

## Description

Hi,

Attachments(3)

Melaina Voss (Melaina.Voss@pncc.govt.nz) contacted Horizons on Oct 21, 2019 04:09 PM with a query relating to Plan Change 2 Submissions. Please respond to them directly as necessary

Thanks  
Michelle Whare

Original Request Detail  
Hello,

Please find attached a cover letter and two submissions to PC2. These are made by PNCC (individual) and joint submission prepared on behalf of Palmerston North City Council, Manawatu District Council, Horowhenua District Council, Ruapehu District Council and Taranaki District Council.

The Submissions are signed by our GM Strategy & Planning who has delegated authority to submit applications under the RMA in absence of our Chief Executive (Heather Shotter).

Kind Regards  
Melaina

MELAINA VOSS | Wastewater BPO Project Manager  
Palmerston North City Council | Private Bag 11034 | Palmerston North  
P: +64 (6) 3568199 | www.pncc.govt.nz



Attachments : PNCC PC2 Submission - SB Signed.pdf  
PNCC Cover Ltr PC2 - SB Signed.pdf  
Joint PC2 Submission - SB Signed.pdf

#### Request Details

Status	Open	Priority	Not Assigned
Mode	E-Mail	Category	Not Assigned
Group	Help	Subcategory	Not Assigned
Technician	Michelle Whare	Item	Not Assigned
Department	Not Assigned	Site	Not associated to any site
Template	Default Request	Created By	System
Last Update Time	Oct 22, 2019 07:47 AM	SLA	Not Assigned
		Created Date	Oct 21, 2019 04:09 PM
		DueBy Date	-
		Response DueBy Time	-

#### Requester Details

Requester Name	Melaina Voss	E-mail Address	Melaina.Voss@pncc.govt.nz
Contact number	-	Mobile number	-
Department	-	Business Impact	-



Request ID : 94365

Status : Open

## Plan Change 2 Submissions

Priority : Not Assigned

By Melaina Voss on Oct 21, 2019 04:09 PM

Due Date : N/A

To : submissions@horizons.govt.nz

## Description

Hello,

Please find attached a cover letter and two submissions to PC2. These are made by PNCC (individual) and joint submission prepared on behalf of Palmerston North City Council, Manawatu District Council, Horowhenua District Council, Ruapehu District Council and Tararua District Council.

The Submissions are signed by our GM Strategy & Planning who has delegated authority to submit applications under the RMA in absence of our Chief Executive (Heather Shotter).

Kind Regards  
Melaina

MELAINA VOSS | Wastewater BPO Project Manager

Palmerston North City Council | Private Bag 11034 | Palmerston North

P: +64 (6) 3568199 | [www.pncc.govt.nz](http://www.pncc.govt.nz)

Attachments : Joint PC2 Submission - SB Signed.pdf (769.40 KB)  
PNCC PC2 Submission - SB Signed.pdf (1541.15 KB)  
PNCC Cover Ltr PC2 - SB Signed.pdf (411.79 KB)

## Requester Conversations

System on Oct 21, 2019 04:09 PM

To : melaina.voss@pncc.govt.nz

## Summary

Thank you for contacting us (++RE-94365++ Plan Change 2 Submissions)

## Description

## Thank you for contacting Help

Your request regarding "Plan Change 2 Submissions" (94365) has been received.

You can add details to your request by replying to this message.

Thanks

Help

## Request Details

Status	Open	Priority	Not Assigned
Mode	E-Mail	Category	Not Assigned
Group	Help	Subcategory	Not Assigned
Technician	Michelle Whare	Item	Not Assigned
Department	Not Assigned	Site	Not associated to any site

Template	Default Request	Created By	System
Last Update Time	Oct 22, 2019 07:47 AM	SLA	Not Assigned
		Created Date	Oct 21, 2019 04:09 PM
		DueBy Date	-
		Response DueBy Time	-
Requester Details			
Requester Name	Melaina Voss	E-mail Address	Melaina.Voss@pncc.govt.nz
Contact number	-	Mobile number	-
Department	-	Business Impact	-



## Joanne Allardice

---

**From:** Cynthia Ward <cynthiaw@horowhenua.govt.nz>  
**Sent:** Monday, 21 October 2019 5:52 PM  
**To:** Penelope Tucker; Lynette Baish  
**Subject:** FW: Joint Submission (PC2)  
**Attachments:** Horowhenua DC WWTP List; Joint PC2 Submission - SB Signed.pdf  
  
**Importance:** High

Hi Pen and Lynette,

Further to my phone call late afternoon (before 5pm) and email about the Joint Submission on PC2, I would be very grateful if you could advise the process to ensure the correct information about the Tokomaru Wastewater project is attached to the Joint Submission.

The Joint Submission currently states: Council is commencing a project to **remove** land based discharge. For the record and to be absolutely clear, the correct information for the Tokomaru Wastewater project is: Council is commencing a project to **move to** land based discharge

Perhaps the correct HDC information could be attached to the submission, or a File Note be attached to explain the issue..

I appreciate your assistance with this request and look forward to your advice.

Thanks and regards  
Cynthia

### Cynthia Ward

Principal Policy Advisor • Kaiwhakamahere Rautaki

126 Oxford Street, Levin • Private Bag 4002, Levin 5540  
Waea Mahi P (06) 366 0999 • Waea Pūkoro M: 64272080840  
[www.horowhenua.govt.nz](http://www.horowhenua.govt.nz)

*Working together to take Horowhenua from Good to Great*



**We are.  
Local Government.**

---

**From:** Cynthia Ward <cynthiaw@horowhenua.govt.nz>  
**Sent:** Monday, 21 October 2019 5:02 PM  
**To:** Lynette Baish <Lynette.Baish@horizons.govt.nz>  
**Subject:** Joint Submission (PC2)  
**Importance:** High

Good afternoon Lynette,

Please find attached a copy of a Joint submission lodged on behalf of the District Councils. It includes an error with respect to Tokomaru. I attach a table including the correct information for Tokomaru.

Thanks and regards  
Cynthia

**Cynthia Ward**

Principal Policy Advisor • Kaiwhakamahere Rautaki

126 Oxford Street, Levin • Private Bag 4002, Levin 5540  
Waea Mahi P (06) 366 0999 • Waea Pūkoro M: 64272080840  
[www.horowhenua.govt.nz](http://www.horowhenua.govt.nz)

*Working together to take Horowhenua from Good to Great*

