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Lodged via: submissions@horizons.govt.nz

Dear Dr Peet

Further Submission from the Manawātū District Council on Plan Change 2 Submissions

Thank you for the opportunity to make a further submission to those submissions received on Plan Change 2.

Over the page is a table that details our further submission and decisions sought. A copy of this further submission will be sent to those submitters that our further submission relates to within five working days of lodging this further submission, as required by the Resource Management Act 1991.



Submitter Name and Number	Submission Point / Decision Requested	Support or Oppose	Reason for further submission	Decision Sought
2 Ruapehu District Council	<p>Submission point 2/4 GEN</p> <p>As noted in paragraphs 4.5 and 4.7 of submission 2, land application systems and loading rates for biosolids, wetlands and wastewater discharges to land have not been made permissible. The current rules and policies could trigger a land use consent requirement in addition to the need for a discharge consent. This imposes limits on acceptable rates of nitrogen leaching. The consequence is that policies in the One Plan that encourage land application become impractical to meet.</p>	Support	Support the provision of a more permissible activity status for those seeking to discharge treated wastewater to land as opposed to direct discharge to land.	That the submission be accepted in so far that it seeks a more permissive consenting framework for discharges of treated wastewater to land.
4 Kahungunu ki Tāmaki nui-a-Rua	<p>Submission point 4/8, Topic 14</p> <p>Consideration of introducing a non-complying status for consent applications for intensive land use activities which exceed the allocation table figures. With requirements for applications to show a staged improvement in water quality, with clear timelines.</p>	Oppose in part	The Manawatu District Council cannot support a non-complying status for applications that do not meet Table 14.2 in the absence of an alternative pathway for applications to discharge treated wastewater to land. If consent applications for the discharge of treated wastewater to land are to be assessed as a non-complying activity this will likely lead to more frequent direct discharges of treated wastewater to waterways, which is contrary to Policy 5-11 that requires all new discharges of treated wastewater to	That the submission be rejected in so far that it seeks a non-complying activity status for intensive land use activities that exceed the allocation table figures.

Submitter Name and Number	Submission Point / Decision Requested or	Support or Oppose	Reason for further submission	Decision Sought
<p>42 Horowhenua District Council</p>	<p>Submission point 42/2 GEN</p> <p>The Horowhenua District Council is concerned at the potential implications of PC2 on management of wastewater and infrastructure and land based disposal as well as the interaction between infrastructure planning and the intensive land use policies and rules. The Council's primary concern is Table 14.2 its application to wastewater irrigation to land.</p> <p>A clear pathway that provides for consenting of wastewater to land (municipal schemes) where N leaching will be above that specified in Table 14.2 but with overall net benefit (by removing direct water discharge), is required.</p> <p>The submitter seeks that PC2 is amended to, as a minimum, exclude areas which receive municipal wastewater applications to land from needing to meet Table 14.2 N leaching limits and that municipal wastewater applications be provided for by an</p>	<p>Support</p>	<p>be to land or to flow through an alternative system before entering a waterbody.</p> <p>This submission is consistent with the submission lodged by the Manawātū District Council. It reinforces the importance of having a clear pathway that provides for the consenting of treated wastewater discharges to land. Without a clear pathway the key objectives of removing treated wastewater discharges to water will have limited success.</p>	<p>That the decision requested in relation to submission point 42/2 is accepted.</p> <p>That is, that PC2 is amended to exclude areas receiving municipal wastewater applications to land from having to meet Table 14.2 N leaching limits and be provided with an alternative policy framework.</p>

Submitter Name and Number	Submission Point / Decision Requested	Support or Oppose	Reason for further submission	Decision Sought
55 Wellington Fish Game Council	<p>alternative policy framework similar to Policy 5-6 in the Regional plan intensive land use provisions.</p> <p>Submission point 55/8, topic 14</p> <p>The submitter seeks to make intensive farming land use activities not complying with Rule 14.1 (c) a non-complying activity; compulsory public notification of the consent; and a maximum time limit of five or ten years for any consent granted under this rule.</p>	Oppose	<p>If PC2 is amended as sought by the submitter this would make consent applications to discharge treated wastewater to land a non-complying activity and likely prevent discharges that do not comply with Table 14.2 from occurring. This would affect any future wastewater discharge consents sought by the Manawatū District Council (and other local authorities) and the renewal of our consents for the Manawatū Wastewater Treatment Plant. The Manawatū District Council is concerned that the decision sought may have the unintended consequence of forcing the Manawatū District Council to discharge treated wastewater directly to waterways for a greater proportion of the year, due to an inability to meet N leaching limits for land-based discharges. This would adversely affect the water quality in the receiving environment and would be contrary to the Policy direction in the One Plan (Policy</p>	That the decisions sought be submitted 55 be rejected.

Submitter Name and Number	Submission Point / Decision Requested	Support or Oppose	Reason for further submission	Decision Sought
63 Ngā o Waihua Paerangi Trust	63/15, topic 14 The submitter does not support the framework in PC2 to allow the granting of consents to exceed the nitrogen allocation framework in the One Plan as long as good management practice or the best practicable option are applied. The submitter seeks amendments to PC2 that require applications for intensive land uses to meet the nitrogen leaching table. The submitter considers that applications to exceed the cumulative N leaching	Oppose	5-11) and the Government direction as set out in the freshwater reforms. In addition, the decision sought by the submitter would add significantly to the cost and complexity of applications for farmers applying for consent for existing (and new) intensive farming land uses. This is contrary to the intent of PC2, to “provide a workable pathway for landowners to apply or resource consent for intensive farming land use activities that cannot achieve Table 14.2 cumulative leaching maximums.”	That the decision sought by the submitter to make applications exceeding the N leaching maximums in Table 14.2 prohibited or non-complying be rejected.

Submitter Name and Number	Submission Point / Decision Requested	Support or Oppose	Reason for further submission	Decision Sought
67 Ngāti Turanga	<p>maximums in Table 14.2 should be considered prohibited or non-complying.</p> <p>67/12, topic 14</p> <p>That a non-complying activity status be applied to resource consents under Rule 14-2A that do not achieve the cumulative nitrogen leaching maximums.</p>	Oppose	<p>aspirations to remove wastewater from waterways.</p> <p>The Manawatū District Council sees the land-based discharge of treated wastewater to land as critical to meeting our commitments under the Manawatū River Leaders' Accord and the Oroua River Declaration.</p> <p>The Manawatū District Council is unable to support the decision sought by the submitter in the absence of an alternative pathway for the discharge of treated wastewater to land.</p> <p>The Manawatū District Council is concerned that the non-complying status sought may have the unintended consequence of reducing Council's ability to discharge treated wastewater to land rather than directly to waterways, resulting in adverse effects to river water quality.</p>	That the decision sought by the submitter in relation to submission point 67/12 be rejected.
68 Te Roopū Taiao o Ngāti Whakarewa Trust	<p>68/12, topic 14</p> <p>That a non-complying activity status be applied to resource consents under Rule 14-</p>	Oppose	<p>The Manawatū District Council is unable to support the decision sought by the submitter in the absence of an alternative</p>	That the decision sought by the submitter in relation to submission point 68/12 be rejected.

Submitter Name and Number	Submission Point / Decision Requested	Support or Oppose	Reason for further submission	Decision Sought
70 Te o Rūnanga Raukawa	2A that do not achieve the cumulative nitrogen leaching maximums.		<p>pathway for the discharge of treated wastewater to land.</p> <p>The Manawatū District Council is concerned that the non-complying status sought may have the unintended consequence of reducing Council's ability to discharge treated wastewater to land rather than directly to waterways, resulting in adverse effects to river water quality.</p>	
70 Te o Rūnanga Raukawa	70/12, topic 14 That a non-complying activity status be applied to resource consents under Rule 14-2A that do not achieve the cumulative nitrogen leaching maximums.	Oppose	<p>The Manawatū District Council is unable to support the decision sought by the submitter in the absence of an alternative pathway for the discharge of treated wastewater to land.</p> <p>The Manawatū District Council is concerned that the non-complying status sought may have the unintended consequence of reducing Council's ability to discharge treated wastewater to land rather than directly to waterways, resulting in adverse effects to river water quality.</p>	That the decision sought by the submitter in relation to submission point 70/12 be rejected.

Submitter Name and Number	Submission Point / Decision Requested	Support or Oppose	Reason for further submission	Decision Sought
83 Palmerston North City Council	<p>83/1, GEN</p> <p>The submitter requests that PC2 and the One Plan be amended to specifically exclude the grazing of land that receives treated wastewater from a wastewater treatment plant from the list of “intensive farming land uses” under Policy 14-5(a); or</p> <p>That a new definition of “irrigation” be added to the One Plan that refers to the irrigation of groundwater or surface water but does not include the disposal of treated wastewater.</p>	Support	This submission point is consistent with the submission by the Manawatū District Council. PC2 and the One Plan currently do not give adequate recognition to the water quality benefits associated with the land-based discharge of treated wastewater relative to direct discharge to waterways.	That the decision sought by the submitter be accepted.
	<p>83/2, GEN</p> <p>The submitter requests that PC2 and the One Plan be amended to:</p> <ul style="list-style-type: none"> a) facilitate the discharge of treated wastewater to land, and enable the receiving land to be used for productive / intensive farming land use activities; and b) remove any requirements for the need to obtain additional resource consents where the discharge of treated wastewater will be undertaken in combination with 	Support	This decision sought is consistent with those sought by the Manawatū District Council in submission 87.	That the decision sought by the submitter be accepted.

Submitter Name and Number	Submission Point / Decision Requested	Support or Oppose	Reason for further submission	Decision Sought
	productive / intensive farming land use activities.			



Please feel free to contact me or the Manawātū District Council's Policy Adviser, Lisa Thomas (Lisa.Thomas@mdc.govt.nz) if you have any questions about this further submission.

Yours sincerely

A handwritten signature in black ink, appearing to read "R. Templer". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dr Richard Templer
Chief Executive