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## Submission to Horizons Regional Council Long Term Plan 2024-34

### Contact Details

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### Overview

A submission on behalf of of Environment Network Manawatū with particular input from its Manawatū River Source to Sea Collective regarding all aspects of the given proposal.

**ENM would like the opportunity to speak to this submission.**

### Background

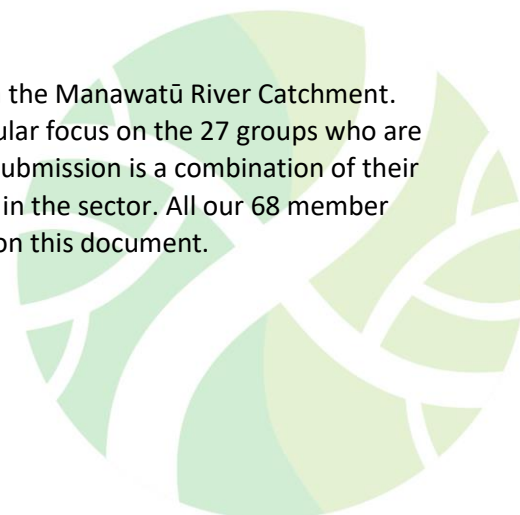
ENM exists to connect and inspire communities for environmental action. We are the environment hub for the Manawatū region providing sector leadership, building capacity and capability, and creating community.

Understanding that all life is part of a thriving, self-sustaining ecosystem our vision is that the ecological and human communities in the Manawatū River catchment, are living in harmony.

We work strategically to demonstrate best-practice as a member-led environmental organisation. We promote environmental activities and advocate for positive environmental outcomes. We connect volunteers, support organisational sustainability, provide educational opportunities and seek to increase the stream of funding to the sector. We support and enable our membership through meeting needs, holding space and creating opportunities for increased connections. We celebrate the diverse passions of our 68 member groups, that include biodiversity protection, freshwater quality, food resilience, waste reduction, sustainable living, alternative energies, climate action and active transport. The network is organised into two collectives: Manawatū Food Action Network and Manawatū River Source to Sea

### Submission Context

Our network is comprised of groups and organisations who span the Manawatū River Catchment. We consulted with them as part of this submission with a particular focus on the 27 groups who are members of our Manawatū River Source to Sea Collective. This submission is a combination of their thoughts, and our organisational knowledge of 23 years of work in the sector. All our 68 member groups have had the opportunity to view and provide feedback on this document.



## Submission

### Issue 1. Responding to legislative requirements – level of service for highly productive land

#### **Option 3: Targeted mapping focussing on land surrounding all existing urban areas (cities, towns, villages)**

We are acutely aware of the diminishing availability of good soils for food production.

The Government identified some of these around major cities, but smaller cities and towns were left out of that work. Food resilience on a regional scale needs to be recognized as essential and the protection of Class 1 soils for this purpose is paramount.

A key space, currently unaddressed here, but not capitalised on, is land in urban areas, such as berms, which can be touted as key growing areas to increase food security. We understand Palmerston North City Council offers guidelines to promote this. These could also be mapped as part of the process.

### Issue 2: Planning for the future.

#### **Option 1 (council's preferred option): Fund work programme for integrated catchment management.**

We support the development of a work programme for integrated catchment management in the understanding that working on a catchment scale offers the best outcomes for people and environment.

Rivers, soils, habitats, communities and consequences have no boundaries. There are many issues that can only be addressed at a catchment scale. An example is the invasion of *Phragmites karka*. This relatively new pest weed is establishing itself in waterways, on farmland and along the coast. The extensive root system has the capacity to undermine stop banks if allowed to establish in their proximity, invade estuaries and rapidly fill wetlands reducing their water retention abilities, grow up through road surfaces, and overrun native vegetation and destroy biodiversity. This weed can't be tackled in a piecemeal way as disposing of removed rhizomes needs to be done in a way that is highly controlled to stop further spread. There are other noxious and invasive weeds *Equisetum arvense* (meadow horsetail), Blackberry and Old Man's Beard all on the rise and we support Horizons to undertake consistent and effective control measures on a catchment scale.

### Issue 3a: Updates to our operational areas - increase to river management insurances.

#### **Option 1 (council's preferred option): Include baseline inflation, revaluations, claim up to \$200 million per event by Horizons and up to \$500 million alongside other councils.**

We realise that the current situation has been determined by decisions made in the past and properties built in flood prone areas need to be protected. We do request that going forward people who want to build in flood prone areas do so at their own risk. In the future there needs to be natural areas set aside for water to go to in the event of flooding and less reliance on expensive infrastructure that needs to be built, maintained and insured. Such infrastructure will be increasingly unable to cope as the decades pass, and the effects of climate change become more severe.

We also advocate for an aspect of managed retreat from spaces that are in flood prone areas and stronger regulation around where people build, to avoid future costs to the environment and the public.

Issue 3b: Updates to operational areas - reduced levels of service for freshwater activity.

**Option 1 (council's preferred option): Return to baseline levels of service and budget 30 kilometres of fencing and 70,000 plants.**

We understand that this has a link to Jobs for Nature funding and won't commence until 2025-26. More landowners need to pick up the costs for fencing and planting on their properties, and they will have time to consider their options around this with a one-year lead in.

We support the use of eco-sourced plants and ask if Horizons currently has an eco-sourcing policy in place.

Issue 3c: Updates to our operational areas – increased levels of service for public transport – Whanganui improvements.

**Option 1 (council's preferred option): Whanganui public transport improvements running by the end of 2025-26.**

Where there is local enthusiasm, this should be responded to in an appropriately short time frame. The routes should concentrate on areas where there are most young people and social need.

Issue 3c: Updates to our operational areas – increased levels of service for public transport – Horowhenua improvements.

**Option 1 (council's preferred option): Wider Horowhenua district, including Levin.**

Connecting to larger areas will lead to greater uptake of public transport over time. Improved connections to Waikanae also make sense in the context of this. The use of smaller vehicles and flexible timetables needs to be explored. A balance needs to be maintained with service and what Horowhenua ratepayers can afford.

Issue 3c: Updates to our operational areas – increased levels of service for public transport – New and improved regional services.

**Option 1 (council's preferred option): New and improved regional services.**

Building strong, comprehensive integrated public transport services are key to getting people to change and adopt new methods of transport, and that leaving cars at home is a viable option. This will take time, in such a vehicle centric climate, but is a must for reduced emissions and climate impact.

Issue 4 Changing fee structure for water meters

**Option 1 (council's preferred option): Changing fee structure for water meters to 100% user pays.**

Water meters being funded by users was a principle of old in subdivisions. Responsibility and awareness of water consumption leads to increase conservation of water. We note and support the fact that this will free up income for scientific research.

We question if the intention is to commence with a supply charge, and only minimal costs for quantity of water? These supply charges are crippling for small users.

### Revenue and Financing Policy

Offsetting the UAGC from investment income does seem to be fairer.

Funding of Horizons eleven drainage schemes: The proposed change from 80/20 split to a 90/10 split does not have any empirical information/data to back it up in the documentation provided. River works undertaken by Horizons have changed where water flows would naturally go.

### Additional commentary

Biodiversity:

A major goal of ENM is the preservation and restoration of biodiversity, both in its own interest, and because it is becoming increasingly clear, even to the thoroughly urbanised, that nature is an important partner in and provider of the needs of humans.

Our region has less than 1 % of its lowland forest left, only 15% of its coastal vegetation, and 10% of its wetlands. The ecosystem services these areas provide are now lost and are difficult to restore.

- We would like Horizons Regional Council (HRC) to put greater restrictions on where vehicles can go on beaches to protect the endemic and precious flora and fauna. We understand and support the submissions of our member groups focused around coastal areas who may also speak to this need.
- We would like Phragmites karka to be listed as a noxious weed, so targeted, funded work can be done around eradication. We understand that Awahuri Forest Kitchener Park will speak to this in their submission, and we support their submission.
- We fully support the submission made by Ruahine Kiwi and ask that HRC recognise Ruahine Kiwi as an icon project, endorse the project which will help encourage other stakeholders to come on board, and commit to match any funding raised by the community (up to \$50,000 per annum). This project meets HRC's outcomes for vibrant and empowered communities, healthy ecosystems and for strengthening relationships with mana whenua.

Transport:

- We encourage HRC to work with councils to incentivise the use of public transport, by de-incentivising parking by the possible raising of costs around this. Feilding is a prime example of this.
- We encourage the intensification of bus and possibly train services between Feilding and Palmerston North. There is a vast amount of commuter travel between the two townships, and traffic has become increasingly heavy.
- We encourage strong collaboration with local district councils to ensure that active transport has a strong commuter focus, not just primarily a health and wellbeing one. A key focus here is, hand in hand with increased public transport, making commuter cycling a viable, safe option.

#### Climate Focus:

The current trajectory of plausible climate change scenarios shows that over 60cm of sea-level rise can be expected along our coast over the next century, or even sooner, along with an average annual temperature warming of 4°C. This will result in salt-water inundation of low-lying areas, erosion of the coastal dunes several hundred metres inland, and increased surface flooding (freshwater) over much of the coastal plains. Simultaneously there will be increases in heat, storm frequency and severity, flooding and drought. This will affect most agricultural and horticultural activities, and much of the amenity plantings in the region, while climate change impacts on the remaining native vegetation and fauna is unknown.

We are pleased to see that HRC have identified building resilience to the effects of climate change as a priority, but we question if the LTP reflects the extent of the urgency needed to avoid or reduce these changes. There needs to be overall guidance offered to the human inhabitants of the region as to how these climate changes and the requisite mitigations might or will affect their lives as currently lived. What is required here is a LTP which has a sense of human needs over a period of several to ten decades, which sets the general direction and level of urgency of councils' policies.

#### To conclude

HRC and the region as a whole glean tangible benefits from the incredible work of our member groups, particularly around biodiversity. It is the role of ENM to connect and inspire communities for environmental action, and to underpin and support their mahi. Palmerston North City Council recognizes us as Sector Lead for the Environment and resources us for our role. We would welcome conversation with HRC about increased partnership so we can work together to provide and expand services to the region. We would also be pleased to see the development of an Emerging Century Plan.

