

**Submission from Water and Environment Care Association (W.E.C.A)  
which includes input from the Hokio Environmental and Kaitiaki Alliance (H.E.K.A)  
to the  
Horowhenua District Council Long Term Plan  
May 2018**

## **General Comment**

According to the Local Government Act (LGA) 2002, when a local authority undertakes public consultation, it must do so in accordance with the principles of consultation set out in Part 6, section 82.

In brief, these principles require councils to:

- provide easy-to-understand summaries of proposals and plans;
- identify who will be affected by decisions and encourage them to make their views known to the council - councils also must give reasons for their decisions; and
- find out what all the practical options are for dealing with issues and carefully assess them.

We assert that the reasoning behind many decisions is lacking across all documents, and in particular we note the lack of transparent baseline, monitoring and evaluation data that would provide an evidence-base from which the community and the council could engage together in a proactive and informed manner. We also see little evidence of a range of options being explored and assessed for key issues affecting the long-term sustainability and viability of the social, cultural and ecological and economic environment in the Horowhenua district.

In addition, local authorities must ensure that they have processes in place for consulting with Māori. The LGA 2002 requires councils to establish and maintain opportunities for Māori to contribute to decision-making processes, consider ways in which they can foster the development of Māori capacity to contribute to decision-making processes, and provide relevant information to Māori. Important decisions about land or water bodies must seriously take into account the relationship of Māori to these, and their culture and traditions.

We assert there has been a lack of genuine collaboration and shared decision-making with the Muaūpoko hapū (Mana Whenua) who hold ancestral and legal kaitiaki rights to Lake Horowhenua and the Hokio stream. As outlined above, key monitoring and evaluation data has not been provided and there has been little attempt to develop a coherent set of regionally developed and appropriate Māori cultural indicators to inform and extend this evaluative work.

We believe that genuine collaboration with the community as a whole, and partnership with Mana Whenua in particular, are key to the sustainable development of the Horowhenua district in a socially, culturally, environmentally and economically sound manner.

It is in support of such collaboration and partnership we offer the following points as part of the development of the HDC Long-term Plan. These comments relate directly to the Infrastructure Strategy Document 2018 – 2048 and associated documents: Financial Statements, Financial Strategy, Infrastructure Strategy, Other Supporting Information, Policies and Activity Statements.

1. Infrastructure Strategy Page 2 - Definitions and Interpretations refer to “prudent financial management”.

We assert it is not ‘prudent financially’ to accept ongoing environmental degradation by particular industry groups in the district. HDC and HRC acknowledge district water quality records show the extremely poor state of Horowhenua streams (Patiki and Arawhata) and lakes (Horowhenua and Papaitonga) which are some of the worst in NZ. This has already resulted in significant negative ecological and cultural impact and is impacting on the ability of the district to provide an environmentally sustainable economy.

2. Page 5 - “over the next 30 years the district will have to proactively replace many assets as they reach the end of their productive life”

We consider these assets not only need to be replaced as essential Infrastructure tools for the district, they also need to be re-positioned. The current positions of the following assets are considered disrespectful to this district's floodplain eco-system. This is well understood by scientific experts and Muaūpoko Mātauranga experts who have argued for decades for right and proper respect for the water, the streams, the lake, the native fish and shellfish of the Horowhenua.

The state of the environment in the region, particularly the district's waterways, is also being increasingly recognised as a problem by the district's public, and residents of Levin and Hokio are expressing their unhappiness at arm's length consultation from HDC, and are beginning to withdraw social licence for HDC to continue with degrading activities.

Specific activities that have been repeatedly brought to the notice of W.E.C.A and H.E.K.A include:

i) **The Landfill on Hokio Beach Road.** This is currently in breach of its Resource Consent but continues to operate. How is this okay? The Landfill is located in sand and near the Hokio stream. It has within it significant pollutants which may not be able to be contained over time. Knowledgeable Hokio residents and Mana Whenua suspect leaching from the site into the Hokio stream is occurring. Kapiti District Council plus HDC continue to truck nearly all Kapiti coast and Horowhenua rubbish to the Hokio Beach landfill. This activity is poorly sited. Conversations with HDC staff and HDC consultants cannot confirm or deny leaching of pollutants or that alternative options for siting the Landfill in hard country were or are rigorously considered.

ii) **The Sewage and waste water Treatment Station.** This continues to be located next to the district's taonga Lake Horowhenua, with the risk of overflows (which have occurred) and the associated historical disregard (and intentional abuse at times) for Māori tikanga, food sources and cultural values.

iii) **The Pot.** This site provides the waste water overflow system from the Sewage Treatment

Station, and is situated in sandy soil on Hokio Sands Road near the Waiwiri stream and coastal shellfish beds. Again this is poorly sited and the Waiwiri stream and the coastal shellfish beds may be being seriously affected by this.

iv) **Fertiliser/Pollutant Run-off.** The ongoing and often excessive application of fertilisers (including nitrogen and phosphate) to enable increased productivity of Market Gardens and Dairy Farms, plus the nitrogen rich effluent from dairy cows is contaminating our streams and lakes. The proximity of the gardens and farms to floodplain land near streams, and to the Lake itself, has increased nitrogen, phosphate and e.coli run-off into Lake Horowhenua and the Hokio stream.

v) **Sediment loss from land into waterways and the sea.** The ongoing significant losses of topsoil that took hundreds of thousands of years to develop from the forests that once covered this floodplain is irreplaceable. This soil is the lifeblood of the land and for human food production. It is rapidly flowing off the land due to insufficient management of well designed “on-site” sediment traps, well designed planting regimes and well-designed wetland recovery or development plus monitoring controls. All on-land businesses including residential and industrial building developments must be required to invest in these activities and contribute to supporting HDC activities to control soil loss. A major risk awaiting the region is the large Pinus Radiata forests in the Tararua foothills above Levin nearly ready to be milled, but no significant actions have been put in place to manage the well known extreme sediment runoff from forestry harvesting.

3. Page 5 - “The Treaty of Waitangi (ToW), the Local Govt Act 2002 and the Resource Management Act 1991(with amendments - RMA)” are all mentioned.

When considered together these legal agreements expect an extremely high level of active, honest and respectful collaboration between the typically pakeha councillors and Māori hapū representatives. In practice this has historically not been the case in this district, with local Māori poorly served at all levels, and according to a 2017 ToW report, Māori have been progressively alienated from 90 percent of their lands over the last 100 years, often through dubious legal deals, and have been forced to live without fair access to their commons (clean water and clean food sources) which is their right, and unable to make a significant living from their remnant land holdings. These activities have dramatically affected the health, wellbeing and mana of local Māori.

The relationship between those who have generally controlled business development in the Horowhenua over 120 years have often enjoyed a strategic relationship with central Government that has supported those business interests in the region, rather than the wider community. This is unlikely to continue for much longer. The “Horowhenua – the Muaūpoko Priority Report” released by the Waitangi tribunal in 2017 lends considerable weight to allegations of land alienation and the active denial of Māori tikanga and values across the area regarding water generally and Lake Horowhenua in particular.

4. Page 9 – Population Growth is considered in a weak manner. The report states it “may / may not increase and this is a moderate risk”.

Given the current environmental degradation of the water and land in the region and the

weak management of these critical assets by HDC it seems safe to assume that any population growth will inevitably put extra strain and stress on the existing assets and on the environment. The general pressure on housing in New Zealand and now in Wellington in particular shows an active increase in population from Wellington up the Kapiti coast and into Otaki and Levin. Increased population growth in the Horowhenua is highly likely and means HDC must pay significant attention to improving the environmental appropriateness of its infrastructure assets and to managing all new business developments.

5. Page 11 – Water, wastewater and storm water data confidence is reported to be “relatively sound with minor shortcomings”.

It would be good for the public to be able to understand what “minor” shortcomings stand for. Greater confidence requires more substantive data. The likelihood of more frequent heavy rain mentioned in the report will significantly impact this floodplain environment and its infrastructure. There appears to be conflicting information provided in the Proposed Cap Ex for wastewater. The Activity Statement document is only focussed on Renewal, but in the Financial Statements document approx 50% of \$169M is noted for improvement and added demand. It is difficult to make sense of this and greater explanation is required.

6. Page 29 – New schemes to promote growth to the region.

All new schemes come with significant costs to a Ratepayer base that cannot afford on its own to fund the additional or replacement infrastructure. All existing and new subdivisions and business developments must have development levies attached. All new businesses need to contribute fairly to the costs of new infrastructure and of mitigating detrimental environmental effects.

7. Page 33 – Improving the discharge quality of storm water into Lake Horowhenua is urgently required.

The current drains flowing directly into the lake are a disgrace and the local habit of discharging storm water directly into streams has got to stop. Many of these streams start as springs and are highly polluted within a short distance of their source.

Additional Issues from the Activity Statements document Page 8 and generally from the Policies document.

8. The notions of Stunning Environment, Thriving Communities and Exuberant Economy are fine but there is little evidence that the HDC activities actively identify the basic environmental and sustainable infrastructure needs of the district and then sets realistic and achievable criteria to work towards these.
9. All the documents provided for this submission use the notion of “setting of targets” as the mechanism for measuring the success of future activities, but no historical concerns (e.g. for the more than 300 odour complaints about the Hokio landfill) or published baseline data have been provided against which targeted improvements could reasonably be evaluated.
10. There is poor access provided to the public to “easy to find longitudinal data” across all HDC activities.
11. There is little clear accountability to the public concerning The Horowhenua Alliance, a

partnership between HDC and Downers Ltd. It would be good for the public to have greater transparency over the way contracts are let, delivered and paid for.

12. Planned coordination between CapEx, Revenue and Direct Costs is not provided in easily cross checkable way in these documents. Rigorous organisations do provide this coordinated information as a decision making tool to support strategic planning.
13. As Solid Waste and Property activities are not for consideration in this Strategy, how can a reliable financial budget be developed without these costs being included?
14. In the current draft HDC Waste Minimisation and Management Plan document, the statutory obligations of the council to effectively and efficiently manage all waste in line with a range of legal documents is clear.
15. However, on Page 69 of Activity Statement document it states “it is important to note that much of the solid waste group of activities is permissive rather than mandatory”. This means HDC currently has the ability to opt out of many of the provisions of its solid waste services if it wishes. We are unhappy with this. We consider HDC needs to take a proactive and responsible approach to recycling practices and waste management across the district.