

Before the Independent Hearing  
Commissioner

Under the Resource Management Act 1991 (RMA)

And

In the matter of A Plan Change request under clause 21(1) of Schedule 1 of the  
RMA by the Rangitikei District Council in respect of the  
Operative Rangitikei District Plan

**Statement of Evidence: Gretta Shone Mills**

18<sup>th</sup> June 2020

## **Background**

- 1 My name is Gretta Shone Mills. I am a Company Director and Specialist Educator. I have a B.A. (Psychology), Dip Tchg, Dip Ed, Cert TESOL, PGDip BusAdmin and I am a NZ Registered Teacher. My husband and I reside at 45 Hawkestone Road, Marton. We have operated our respective businesses from this address since 1997.
- 2 I declare an interest in our small family Forestry block in the Turakina Valley. We have trees that will be harvested within the next five years but we are very wary of this 'forestry' development proposal so close to Marton that requires such a large 217 hectare area land to be changed from rural to industrial.
- 3 My husband and I first came to Marton in 1977 and our family has lived in Marton for more than 40 years. My education and training company is a NZQA registered and accredited Private Training Establishment (PTE) that for many years offered 'second chance' foundation education for Marton, Ratana Pa and Taihape adults to upskill for bridging to further education and/or training, employment or business opportunities. Our very successful programmes were attended by a majority of Maori students and many Samoan migrant women. My husband's training and consultancy company specialises in water industry consultancy and training in New Zealand and he is involved extensively with overseas water contracts in South East Asia, Pacific Islands and elsewhere.

### **Marton, a small 'wealthy' rural village.**

- 4 When we first arrived in 1977, Marton was a quiet, pleasant town surrounded by a beautiful rural environment and farming communities. There were tree lined residential streets, parks, halls, historic buildings, a town hall/picture theatre and a busy main street of traditional shops and services including a busy Post Office and several banks. There were two doctor surgeries in Marton, two chemist shops and a Marton & Districts Hospital which catered for maternity, nursing care and respite care for the elderly. There were two kindergartens and a pre-school, seven primary schools (including state integrated St Mathews and private Huntly School), Rangitikei Intermediate Rangitikei College and two state integrated high schools, Turakina Maori Girls and Nga Tawa School for Girls.
- 5 The socioeconomic characteristics of the residential population at this time included a distinct group of 'wealthy' 5<sup>th</sup> or 6<sup>th</sup> generation farming families, a large but varied 'middle income' group of various professional, trade qualified or semi-skilled and a small group of 'lower income' workers.
- 6 The predominant rural employment in the Marton area included self-employed farming families, farm workers, stock agents, shepherds, shearers, farm supplies and machinery, vehicle and equipment services. There were also forestry

workers, and timber mill workers at two sawmills (McIlwaines, MSD Speirs/BenchMark). The Feltex Mill at Kakariki employed wool process workers and there were other manufacturing jobs at the Chenille Factory in Marton (bedspreads and other Manchester items), Marton Brick and Tile (clay field tiles etc) and at the Williams family's Production Engineering Company. PEC manufactured fuel pumps, 'high tech' electronic security products etc. for New Zealand and international markets. In fact, at one stage PEC staff had T-shirts which read something like this: *PEC- London, Sydney, Johannesburg- Head Office Marton.*

- 7 The Government Health Sector provided employment at the Marton and Districts Hospital and at Lake Alice Hospital (situated off SH3 near the junction with Pukepapa Road). Ohakea Airforce Base provided local employment for residents from Marton and Bulls. The Railways was a significant government employer in Marton as the goods and passenger services for the North-South Main Trunk line and the West-East line all passed through the vital Marton Junction area.
- 8 Soon after we settled in Marton the Marton Malting Company built the barley malting facility on Wings Line. This was an initiative owned by large NZ breweries and a South Island seed company (?).
- 9 During the late 1970s and early 1980s there was very little unemployment in the Marton district.

**1980s – 'Rogernomics and Ruthenasia' decimated Marton employment.**

- 10 New economic changes instituted by Government Ministers Roger Douglas and Ruth Richardson in the 1980s started to take effect in rural areas. Government and other services were downsized, closed or shifted from Marton to the regional cities of Whanganui and Palmerston North. Farm incomes dropped and many local people lost their livelihoods. In the late 1980s through to the early 1990s, Marton lost two sawmills, railway workers, passenger trains, a functioning Marton Railway Station, the Marton and Districts Hospital, Lake Alice Hospital, Feltex Mill, Chenille factory, a chemist shop, a doctor, several shops etc. However, we did gain a new government service- a WINZ office!
- 11 There have been changes In the 25 years since this dramatic economic period which stripped Marton of many of its services and industries. Some industries have been retained, some have grown or ownership has changed: PEC Fuel Pumps (now owned by Gallaghers, NZ), Speirs Foods (owned by the Speirs Group, NZ), Tux Purina (owned by Nestle, Switzerland), Marton Brick and Tile Ltd (local owner?), Bonny Glen Landfill (now owned by Chinese), Malteurop (formerly Marton Malting- owned by a French Food company), ANZCO Foods (owned by a Japanese Food company), McIlwaine's Mitre 10 (McIlwaines, NZ), a variety of farm service companies, two supermarkets- Countdown (Australian

owned) and New World (local owner, NZ). A new Rangitikei Health Centre was built. Forests have also been planted and maintained by farm owners and other land owners as well as by international forestry interests.

### **Marion Maori & Samoan Populations**

- 12 Maori have always been well-represented in Marion as local families stayed and others joined them for employment. Many local Maori were from *Nga Hau E Wha*- the four winds i.e. not necessarily related to local iwi groups. Initially in Marion the population comprised a large majority of Pakeha/European, a sizeable group of Maori and very very few 'other' cultural groups. In the past 12 years a sizeable group of Samoan migrants have made Marion and Bulls their home. They become NZ residents through the Samoan- NZ quota scheme. ANZCO Foods (formerly known as CMP) has brought approximately 30-40 Samoan individuals/families to work at the lamb processing plant in Marion every year since summer 2007. In recent years these migrants have also been employed at the ANZCO Riverlands beef processing factory in Bulls.

### **Nga Wairiki-Ngati Apa**

- 13 Since achieving their Treaty Settlement in 2008, local Rangitikei Iwi Nga Wairiki-Ngati Apa have had an increasing presence and economic influence in the local community. The Iwi and its services are now based at the former Turakina Maori Girls College in Henderson Line, Marion.

## Proposed Plan and Process

14 Before addressing issues of concern with the proposed plan and its process I would like to draw attention to the 'silent' voices in this consultation process:

- Mr Whale/Cantara Farms Ltd– present owners of the 216.6 hectare farm.
- Ngati Apa- a brief letter of support (dated 04 June 2020) provided to the Rangitikei District Council doesn't show an appreciation of the wider implications or detail of this proposed plan change.
- Te Roopu Ahi Kaa- its stated purpose is to assist the Council to develop a partnership through engagement with Tangata Whenua?
- Residents living on Makirikiri Road and Pukepapa Road proposed 'corridors' for heavy vehicle forestry traffic travel to the proposed 40 hectare Bioforestry site.
- Women- 50% of local residents of Marton are female. They work, own property and businesses, pay rates, buy goods and services, travel local roads etc etc. Why aren't their voices being heard?
- Low income and other residents of Marton Junction who live on or near the heavy traffic bypass from SH1 via Wings Line, French Street, Matai Street, Main Street, Nga Tawa Road, Calico Line to SH1 and vice versa.

15 After reading submissions and listening to evidence on the first day of the hearing I support the submissions of the IRO – MAR representatives. In particular:

- Concern for visual and aesthetic effects of the Marton landscape which will be destroyed by this large block of cropping land being changed from rural to industrial. This is not a suitable SH1 rural vista for an historic rural 'village' community.
- Challenge to the employment and Marton community growth assumptions promoted by the supporters of this zone change. Real, long term sustainable growth will more likely come from existing and new SMEs moving to Marton than from a large scale 'boom and bust' industry such as forestry.
- Rangitikei District Council's lack of information and transparency with consultancy on this Zone plan change proposal. It appears that there has been a 'private club' of certain local businesses (some with vested interests) who have been privy to information about this project that has not been available to other local residents.
- The quiet of the natural environment, birdlife and clear night skies that residents enjoy and wish to retain- undisturbed by noise, vibrations, light spill, toxic emissions and odour.

- 16 I also support Howard and Samantha Walsh's submission and that of their counsel, Nicolette Brodnax in its entirety. I would like to note that buffer zones planted with trees can also damage clay tile drains!

### **The Three Waters**

- 17 The paucity of information on three waters is alarming. For this Hearing knowledge of the local context of three waters management is important.

### **Stormwater**

- 18 The proposed use of integrated stormwater management systems based on 2015 Auckland City Council guidelines as proposed by Mr Carlyon is not even acceptable in principle. Let's put Mr Carlyon's submission into perspective.
- 19 Mr Carlyon's submission states the need for a 6.5ha pond/wetland presented as the most significant stormwater impact mitigation measure is a nonsense because it relegates stormwater management to a simple collection /drainage scenario. One aspect of storm water management quoted - *Water Sensitive Design of Stormwater, Publication Code GD 04 Auckland City Council 2015 is a 194 page manual compiled by 8 authors, 4 peer reviewers overseen by an editorial committee of about 20 experts* illustrates the complexities and cost of developing environmentally sensitive storm water management systems in built up urban areas and is not appropriate for a rural low density undulating farmland with underlying heavy clay strata.
- 20 Mr Carlyon has avoided the fact that the site is poised for development of significant extractive processes. It is acknowledged that the intended Bioplastic products (poly lactic acid and poly hydroxyl alkanonates) are non toxic but the processing pathway is not and the significance of this is not covered in Mr Carlyon's submission.
- 21 No water quality /water quantity data in relation to the proposed use of the site or baseline data on stream biota, site fauna and flora has been made available. Consideration of topography, clay soil types and the existence of clay tiles/ mole drains for farm drainage is a good starting point for design. Again Mr Carlyon's submission is lacking.
- 22 An active voluntary community group has been working with the District to improve the catchment and water quality of the probable main receiving water (Tutaenui Stream) so it is surprising that this group has not objected to the proposed industrial site potentially negatively impacting on the Tutaenui Stream. Mr Carlyon has been/ is an active member of this Community Group.

## Potable and Industrial water

- 23 Council reported in the press that it has commissioned about 20 major reports on the Marton water supply over the last decade or so and recently the local newspaper (District Monitor) reported that the safe yield from the 50 year old surface water impoundment system that supplies Marton will be insufficient to meet the future needs of the town so groundwater resource investigations will be needed.
- 24 No evidence has been submitted to refute the fact that the underground water resources for the future Marton potable water supply may be in direct conflict with the high non-potable water requirements of the proposed industries. The developer indicated that at least initially 'a deal' would be done with Malturop to use it's consented bore.
- 25 The RDC CEO has provided a supplementary submission referred to the Calico Line deep bore that was constructed over a decade ago. His statement is misleading so for the record.
- The CEO's secondary submission is in direct conflict with RDC press statements over the last few weeks as just discussed.
  - How can RDC say it can supply water to the industrial site when it has no idea of water demand, provides no evidence of the hydraulic model (capacity) of the Marton pipe network?
  - The deep Calico Line bore was developed as a supplementary water source for the surface water impounded system about a decade ago and was intended as a supplementary supply for use during drought conditions. The Calico Line bore water is exceptionally hard (very high calcium content).
  - Two of the 20 or so reports on the Marton water supply established that softening the hardness of the Calico Line Bore water from about 350 units to about 80 units (NZ Drinking Water Standards) was costly- several million dollars so RDC did not opt for the softening process and now ONLY when it has to (dam levels are too low) it pumps Calico bore water directly into the water mains so that it dilutes with the treated impoundment water (50 hardness units) in the pipe lines..... but the dilution rate of bore water to impoundment water is insufficient so the water in the pipes from the combined sources that then covers about a half of Marton is still unacceptably hard ..... failed hot water cylinder, blocked jug elements etc etc because of the high calcium content of the water and iron staining of household laundry etc are common complaints when the Calico Line bore is used.

- Additionally the bore is deep and pumping costs are very expensive. The impounded dam water supply is gravity feed from source to customer.
- To put it bluntly industries that use hot water and steam need to have water hardness in the range 0-5 units. If the existing Marton surface water (about 25 units) is supplied then reducing hardness from 25 to about zero is an option for them but from 200-350 is not an economic option.
- Geo-hydrologists can identify water aquifers but RDC knows from its one existing bore on Tutaenui Road that that bore is also classified as very hard water! It is so hard that RDC pumps the water uphill back into the dam for dilution purposes. At one stage RDC considered abandoning that bore rather than going through the expensive bore commissioning process.
- No water supply feasibility study or an outline of quality and quantity and water availability requirements has been submitted. Assumptions have obviously been made that an adequate water resource will be available yet the statements on water supply from the CEO are contradictory to say the least.

26 If the existing Marton water supply raw water system safe water yield is insufficient where is the risk analysis report with regard to conflict of interest with both the proposed development and the Marton community opting for groundwater.

#### **Wastewater**

27 Where is the technical report for disposal of domestic wastewater and process water? Potentially if the site is developed as per the developer's submission the process water could contain a whole range of organic aromatic compounds the removal of which will require specialised and expensive wastewater treatment and potentially ditto for stormwater.

28 No evidence to characterise the scale and nature of the waste streams and or a draft water and waste management plan has been provided. Again only assumptions on behalf of the developer have been made.

29 Rangitikei District Council (RDC) operates eight community wastewater treatment systems of which one (Marton wastewater ponds) is close to the proposed industrial site. Reference to Horizon Regional Council records shows that almost all the eight community wastewater systems are regularly non-compliant with resource consent requirements and some including Marton



wastewater treatment ponds are well outside the approved resource consent time line - with Horizons Regional Council tacit approval!

- 30 Before Marton wastewater treatment system can be considered as a possible option for any of the waste streams from the industrial site the following points need to be considered; (i) RDC made poor technical, economic and financial decisions in the recent past to accept leachate waste from the Mid West Disposal Regional Landfill and the expensive legacy of this is left for ratepayers to fund, (ii) resources consent for the Marton wastewater treatment system have been an issue ad infinitum ( at least a decade) but recently a preferred scenario of piping Marton wastewater to an area near Bulls has been mooted.
- 31 The significance of piping this wastewater is that RDC must make better decisions than it did with the landfill leachate debacle. Where is the evidence of the proposed industrial site wastewater volume, strength and potential toxicity of the wastewater streams considered and where is the risk analysis report for pumping the increased wastewater volume? Again, to put this in perspective. The Carlyon submission carefully avoids the issue but we as ratepayers are only too conscious of past RDC poor decision making practice. For example an incremental increase in the diameter of the proposed Marton to Bulls pipeline increases the cost exponentially- who pays the extra capex and operating costs if any of the waste streams from the industrial site are accepted as part of the Marton Community wastewater ?
- 32 RDC only recently started to develop Trade Waste By-laws and this was only deemed urgent as a result of the landfill leachate debacle.

**Final comment:**

- 33 The lack of data in the RDC submissions, the paucity of information to indicate an acceptable approach is being considered to section 32 obligations suggests that the proposed developer is not going to be good 'community neighbour' and change of land use classification is not going to provide the community and economic outcomes touted by Rangitikei District Council.

Dated this 18th day of June 2020

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Gretta Shone Mills

## **Te Roopu Ahi Kaa\***

The purpose of Te Roopu Ahi Kaa is to assist the Council to develop a partnership **through engagement** with Tangata Whenua. As well, it is to identify and advise on issues of concern to Tangata Whenua, the Ratana Community and Council, and facilitate resolution in the best interests of the residents, ratepayers, and Tangata Whenua of the Rangitikei District.

### *Objectives*

- The Committee and Council to work together to ensure that both Māori and the Council are aware of all relevant issues and are able to participate in Resource Management decision making.
- The Committee and Council to continue to work together to ensure that Resource Management consultation takes place with the properly identified point of contact for Māori.
- The Committee and Council to work together to ensure that the relationship of Māori with the environment, along with the values and sites that are of importance to Māori, are protected and, where acceptable, identified.
- The Committee and Council to ensure that the protocols contained within the Memorandum of Understanding – Tutohinga, are exercised in the utmost good faith to ensure that the needs of both Māori and the wider community are met.
- The Committee to review the relevant processes of Council and make recommendations on steps to be taken to assist Council in carrying out its functions and responsibilities in a bicultural manner taking into account the principles of the Treaty of Waitangi.
- The Committee to develop draft proposals which recognise the Tangata Whenua of the Rangitikei District's Kaitiakitanga (the exercise of Guardianship) and Rangatiratanga in a manner consistent with the provisions of the Resource Management Act 1991.
- The Committee to provide advice and assistance with the Council's Policies, Bylaws, Rating and Funding, Strategic Plan, Annual Plan, and other activity plans (ie recreation, library, transport, etc).

### *Representation*

Māori of Rangitikei are represented on Te Roopu Ahi Kaa by members of Ngati Rangituhia, Ngati Whitikaupeka, Ngati Parewahawaha, Ngati Hauiti, Ngati Ariki Turakina, Kauangaroa / Nga Wairiki, Ngati Kauae /Taurira, Ngati Hinemanu / Ngati Paki, Whangaehu, Ngati Tama Kopiri, the Rātana Community, as well as two elected members of the Rangitikei District Council.

Committee members are recommended to the Council from the various hapu and marae groups within the District and they represent iwi, hapu and marae within the Rangitikei as well as a representative from the Ratana community, identified as a special interest group within the rohe.

\* Information from the Rangitikei District Council website 18/06/2020