

## Sue de Jong

---

**From:** Customer Services  
**Sent:** Thursday, 27 February 2020 3:10 pm  
**To:** Resource Consents  
**Subject:** FW: Plan Change 14 further submission  
**Attachments:** PC14 further submission.pdf  
  
**Categories:** Submissions/Evidence

---

**From:** Chelsea Wallace <Chelsea.Wallace@southerndhb.govt.nz>  
**Sent:** Thursday, 27 February 2020 2:43 pm  
**To:** Customer Services <csoalex@codc.govt.nz>  
**Subject:** Plan Change 14 further submission

To whom this may concern,

Please see the Plan Change 14 further submission attached on behalf of Public Health South.

Please confirm with confirmation that you have received this submission.

Kind Regards,

**Chelsea Wallace | Health Protection Officer | Public Health South**

Public Health South, PO Box 2180, Frankton, Queenstown, 9349, New Zealand

Mobile: 027 2047569 | email: [chelsea.wallace@southerndhb.govt.nz](mailto:chelsea.wallace@southerndhb.govt.nz) Phone 034509157 or ext 54157

**Kind – Manaakitanga | Open – Pono | Positive – Whaiwhakaaro | Community – Whanaungatanga**

Caution: The information contained in this e-mail message is confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution or reproduction of this message is prohibited. If you have received this message in error, please notify Public Health South immediately. Thank you.

*Please consider the environment before printing this email.*

---

This email or attachments may contain confidential or legally privileged information intended for the sole use of the addressee(s). Any use, redistribution, disclosure, or reproduction of this message, except as intended, is prohibited. If you received this email in error, please notify the sender and remove all copies of the message, including any attachments. Please note, the views expressed in this communication are not necessarily those of the Southern DHB, unless expressly so stated or apparent from the context.

FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION ON PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To Central Otago District Council  
PO Box 122  
ALEXANDRA 9340

**Name** Public Health South  
**Address** PO Box 2180,  
QUEENSTOWN 9349

1. This is a further submission in support of, or in opposition to, submissions on the Proposed Plan Change 14.
2. Public Health South is a party with an interest in the proposal that is greater than the interest of the general public. Southern District Health Board (Southern DHB) presents this submission through its public health service, Public Health South. Southern DHB delivers health services to a population of 335,900 and has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. It seeks to promote equity and to reduce adverse social and environmental effects on the wellbeing of people and communities. **They aim to create or advocate for healthy social, physical and cultural environments.** Public Health South's original submission on the Proposed Plan Change 14 set out the reasons for their position to the Proposed Plan Change.
3. The original submissions that Public Health South either supports or opposes are described, and the reasons for Public Health South's support or opposition are detailed, in the table attached as **Annexure A** to this further submission.
4. Public Health South seeks that the relief set out in **Annexure A**, in terms of allowing or disallowing original submissions, be granted.
5. Public Health South **does** wish to be heard in support of this further submission. If others make a similar submission, Public Health South will not consider presenting a joint case with them at a hearing.

Date: 27<sup>th</sup> of February 2020

Signature 

Chelsea Wallace, Public Health South

Address for Service: Public Health South

PO Box 2180,

Queenstown 9349

Telephone: 03 450 9157

Email: [chelsea.wallace@southerndhb.govt.nz](mailto:chelsea.wallace@southerndhb.govt.nz)

Contact person: Chelsea Wallace

Note to person making further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.

Annexure A

Table 1: Public Health South’s position on submissions of the Proposed Plan Change 14

Submitter	The particular parts of the submission PHS supports or opposes	Relief sought by submittor	Public Health South’s position & reasons	Relief sought
Fire and Emergency New Zealand Submission 24	24/4	a) The provision of adequate firefighting water supply and firefighting access is critical. It is important to FENZ that any new dwelling or land use that does not have access to a reticulated water supply has access to an adequate firefighting water supply of some kind. This essential emergency supply will achieve the purpose of the RMA.	PHS supports the need for FENZ to have access to a firefighting water supply. PHS recommends the reticulation of drinking water and wastewater, which would also provide access to a firefighting supply.	Incorporate relative provisions into the plan; acknowledge the need for access to a firefighting supply through a reticulated source.
Horticulture New Zealand Submission 38	38/17  38/19	a) Horticulture means loud noises (frost fans, bird scarers, motor bikes etc) and sometimes chemical sprays. Reverse sensitivity issues arise when urban dwellers expect a different level of amenity to what they experience when living on the urban-rural interface. This is a result of both inappropriate development and the interface not being managed appropriately.  b) HortNZ are of the view that appropriate reverse sensitivity mitigation should be provided within the urban land being developed, and not within productive rural land.	PHS supports the acknowledgement of access to environments that have safe air quality. Reverse sensitivity can cause unwanted exposure to chemicals and pesticides, which can result in adverse health effects. <sup>1</sup>  PHS supports the acknowledgment of reverse sensitivity of noise. Although noise has not been recognised in our original submission we support HortNZ comments and recognise noise	Incorporate relative provisions into the plan; acknowledge the potential reverse sensitivity effects that may arise from legitimate horticultural activities.

<sup>1</sup> Kim, K et al., (2017). Exposure to pesticides and the associated human health effects. Sci Total Environ. Jan 1;575:525-535

			<p>as a public health issue.</p> <p>Unwanted or undesirable noise puts pressure on individual or community health, wellbeing and restricts an individual's enjoyment on the environment.<sup>2</sup> Adverse effects can include both negative physiological and psychological health outcomes.</p> <p>The consequences of environmental noise are associated with many adverse health outcomes, including both auditory and non-auditory health outcomes. Non-auditory health outcomes include: noise annoyance, sleep disturbance, cardiovascular disease, and effects on cognition and learning.<sup>3</sup></p> <p>Mitigation measures are therefore important to reduce the negative health outcomes of noise.</p>	
NZ Transport Agency Submission 65	65/8	<p>a) The Proposed Plan Change would generate residential activities, which would increase traffic volumes entering/exiting SH6 and would require the appropriate safe systems upgrades to intersections with SH6 (Ripponvale Road and Orchard Road). There is potential for pedestrians and cyclists wanting to cross SH6 to the Cromwell Township. Therefore consideration of the provision of safe and efficient pedestrian/cycle access across SH6 to</p>	<p>PHS supports safe active and public transport, and community connectedness.</p> <p>PHS strongly advocates for and encourages individuals and their communities to be active, including active transport networks. Providing safe transport choices and creating a shift in transport behaviours towards public and active transport has positive benefits for health, the environment, and the community. This occurs through increased physical activity to get</p>	<p>Incorporate relative provisions into the plan; acknowledge the need for safe public and active transport.</p>

<sup>2</sup> Canterbury District Health Board, Community & Public Health. *Environmental noise can affect your health*. 2019. <https://www.cph.co.nz/your-health/noise/> (accessed Feb 12, 2020).

<sup>3</sup> Basner, M., Babisch, W., Davis, A., Brink, M., Clark., Janssen, S., & Stansfeld, S. (2014). Auditory and non-auditory effects of noise on health. *The lancet*, 383(9925), 1325-1332.

		the Cromwell Town Centre is required.	<p>to/from public transport, improved air quality and fewer greenhouse gas emissions, as well as improved road safety.<sup>4</sup></p> <p>Reducing the reliance on individual car use and reducing road congestion must be a priority to ensure liveability is retained as the district grows. Ultimately, decreasing traffic will increase safety - particularly in the current community where infrastructure is dominated by cars.</p> <p>Further, the opportunity for safe and efficient pedestrian/cycle access into the Cromwell Town Centre will increase community connectedness.</p>	
Otago Regional Council Submission 67	67/2-67/5  67/6-67/7  67/17 – 67/20	<p>a) Air quality: Cromwell is considered “polluted” by the Ministry for the Environment. With twice the allowable daily of particulate matter (PM<sup>10</sup>) set in the National Environmental Standard for Air Quality (NESAQ) limits.</p> <p>b) Reverse sensitivity: ORC requests that CODC ensures that reverse sensitivity is adequately addressed to give effect to the RPS Policies for rural activities, recognising that urban and/or rural residential development into rural areas, which is where primary production activities are to be maintained and provided for.</p> <p>c) Transportation: ORC requests that CODC</p>	<p>PHS supports the acknowledgement of access to environments that have safe air quality.</p> <p>PHS supports the acknowledgement of reverse sensitivity from neighbouring horticultural business activities and recognises this as a public health issue.</p> <p>PHS supports safe active and public transport,</p>	Allow submission and acknowledge the relevant provisions into the plan.

<sup>4</sup> Goodin, H. Evidence Snapshot. Promoting Physical Activity at the Local Government Level. Agencies for Nutrition Action, p 4, 2015. <http://www.healthyaucklandtogether.org.nz/assets/Uploads/ana-evidencesnapshot.pdf> (accessed Feb 3, 2020)

		consider how the plan change might give effect to the policies of the Otago Southland RLTP 2019 and the RPS (2019) with respect to access, choice, connectivity and safe transport.	and community connectedness.	
--	--	---	------------------------------	--