

SUBMISSION ON A NOTIFIED PROPOSED PLAN CHANGE UNDER CLAUSE 6 SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991

To: Central Otago District Council

This is a Submission by: Public Health South on behalf of Southern District Health Board

1. This is a submission on the following change proposed to the following plan (the proposal) Proposed Plan Change 14 (PC14) to the Central Otago District Council.
2. Public Health South (PHS) is not a trade competitor for the purposes of s.308B of the Act.
3. The broad reason for these submissions is to provide objective and independent input to promote the reduction of adverse effects on the health of people and communities pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
4. Public Health South (PHS) has statutory obligations for public health within this area under Crown funding agreements between the Ministry of Health and the Southern District Health Board. The Ministry of Health requires public health services to advocate for the reduction of any potential health risks that are due to decisions made by local authorities. This can include making submissions on Proposed Policy Statements, Plans, including Changes or Variations to Changes. The proposal covers matters with potential health effects on people and communities.
5. The specific parts of PC14 to which this submission relates to include:
 - a) Air quality;
 - b) Community connectedness; and
 - c) Drinking water and wastewater reticulation.

These provisions are shown in the attached schedule including whether we support, oppose or are neutral regarding the specific parts or wish to have them amended, and our reasons are stated.

Air quality

6. The site is located adjacent to an established orchard. Potential effects arising from legitimate horticultural activities include potential spray drift. The application does not discuss mitigation measures proposed to manage the effects of spray drift. Exposure to the chemicals in pesticides can result in adverse health effects.¹
7. The New Zealand Standard 8409:2004 Management of Agrichemicals Guidelines, Part G6 recommends a 10 meter setback where shelter is provided, and an air blast sprayer is used.²
8. Having noted that, Public Health South's Air Quality advisor³ to Plan Change 13 argued in her evidence that New Zealand Standard 8409:2004 Management of Agrichemicals Guidelines, Part G6 offers inadequate protection to avoid potential adverse effects from pesticide exposure from spray drift. This is especially true of abnormal operation (for which separation distances are recommended). The words from her evidence are quoted below:

"For these reasons I consider that more reasonable separation distance between residences and agrichemical application (by air blast sprayer) would be at least 100 metres. This would provide a more reasonable distance for dispersion in the event that something goes wrong (e.g. change in wind direction during spraying). A key reason for specifying air quality separation distances is to prudently manage unintended or accidental discharges".

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

²New Zealand Standard: Management of Agrichemicals. NZS8409:2004. 2004.
[https://shop.standards.govt.nz/catalog/8409:2004\(NZS\)/scope](https://shop.standards.govt.nz/catalog/8409:2004(NZS)/scope) (accessed Nov 28, 2019).

³ Louise Wickham in her evidence to the CODC Plan Change 13 Hearings 2019

Community connectedness

9. PHS is concerned about the lack of connectivity of the site with the established urban environment of Cromwell. The site is spatially separated from Cromwell by an orchard and rural land. Access to Cromwell is obtained via Kawarau Gorge Rd (SH6), which has a speed limit of 100 km/hr. Walking and cycling to schools, shops and community facilities from the PC14 land is not provided for. The location of PC14 therefore does not promote transportation alternatives such as cycling and walking that have physical health benefits. Physical activity is associated with many positive outcomes for individuals, including reducing the risk of depression and chronic diseases like heart disease and diabetes.⁴ In addition, it also provides a number of community benefits such as increased productivity in local workplaces and improved perception of community safety as there are more people around in public places and increased livability in the local area.⁵
10. Other concerns include traffic management from Ripponvale Road onto SH6. Reducing the speed on SH6 before the Ripponvale Road entrance will create a safer and more efficient traffic flow from Ripponvale Road onto SH6. A further recommendation includes the inclusion of an underpass from Ripponvale Rd under SH6, which will allow a safe access for walkers and cyclists into Cromwell and will reduce the severance effect.

Drinking water and wastewater reticulation

11. PHS recommends connecting drinking water and wastewater to a reticulated source. This is particularly important as there is likely to be future development in this area.
12. A Three Waters Review (2017), initiated by the Government was established to improve the regulations and supply of the three waters (drinking water, wastewater and stormwater). Effective sources and systems of the three waters are an essential component of health and safety, prosperity and the environment of our communities.⁶
13. Public Health consequences associated with a lack of infrastructure and integration of the three water services introduces the risk of disease outbreaks from communicable diseases, and puts pressure on the environment.
14. The decision we seek from the Council for each submission point is set out in the attached schedule together with more precise details. Where we seek amendment to the proposals by stating new words to be inserted into the provisions, or seek amendment to the wording of specific parts, we assert that the scope of our submission is intended to also cover words to the like effect in the specific part or elsewhere in the proposal or otherwise in the Policy/Plan, which might be consequentially added or amended.
15. We attach in a Schedule how that provision in the proposal should be modified.
16. This submitter wishes to be heard in support of these Submissions at any hearing but is not prepared to consider presenting a joint case with other submitters. This submitter is willing to participate in any pre-hearing conferences, or mediation.

⁴Ministry of Health. Physical activity and health conditions. 2019. <http://www.health.govt.nz/your-health/healthy-living/food-and-physical-activity/physical-activity/being-active-everyone-every-age/physical-activity-and-health-conditions> (accessed Oct 21, 2019).

⁵Goodin, H. Evidence Snapshot. Promoting Physical Activity at the Local Government Level. Agencies for Nutrition Action, p4. 2015. <http://www.healthyaucklandtogether.org.nz/assets/Uploads/ana-evidencesnapshot.pdf> (accessed Oct 21, 2019).

⁶Department of Internal Affairs. Three Waters Review. 2019. <https://www.dia.govt.nz/Three-waters-review#Cabinet> (accessed Nov 25, 2019).

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SCHEDULE OF SUBMISSIONS BY PUBLIC HEALTH SOUTH

Submission 1

Provision	16.3.1 Objective – Safe and Efficient Roading
Position: Support in part Submission: Recommendations are required to improve the safety, reduce severance, and improve community connectivity to Cromwell. Improving the connectivity between the PC14 land and Cromwell will promote active transport and will allow a safer access for walkers and cyclists into Cromwell. Decreasing the speed limit before the Ripponvale Road turnoff will improve the safety of exiting and entering Ripponvale Road onto SH6.	
Decision Requested: Should PC14 be confirmed, we recommend consideration of an underpass under SH6 and decreasing the speed limit to 80km/hr before the Ripponvale Road turnoff.	

Submission 2

Provision	16.3.2 Objective – Services and Infrastructure Evaluation: Infrastructure report outlines that there is capacity to connect to reticulated water and wastewater supplies and normal methods of stormwater disposal for rural subdivisions will be suitable.
Position: Support Submission: There are public health consequences associated with a lack of infrastructure and lack of integration of the three water services.	
Decision Requested: Should PC14 be confirmed, retain objective 16.3.2	

Submission 3

Provision	16.3.11 Objective – Effluent Disposal Evaluation: The Infrastructure Report (Appendix F) identifies there is capacity to connect to Council’s reticulated wastewater system. However, it may be feasible for some of the larger rural lots to dispose of wastewater onsite subject to meeting the requirements of AS/NZS1547/2012. Under either scenario it is considered that wastewater can be managed accordingly so that it will not have adverse effects on the District’s water bodies.
Position: Support in part Submission: Connection to reticulated sewerage needs to be a priority for all residential activity.	
Decision Requested: Should PC14 be confirmed, deletion of the words as follows: The Infrastructure Report (Appendix F) identifies there is capacity to connect to Council’s reticulated wastewater system. However, it may be feasible for some of the larger rural lots to dispose of wastewater onsite subject to meeting the requirements of AS/NZS1547/2012. Under either scenario it is considered that wastewater can be managed accordingly so that it will not have adverse effects on the District’s water bodies.	

Submission 4

Provision	17.3.1 Objective – Avoidance or Mitigation of Hazards
Position: Support in part Submission: The site is located adjacent to an established orchard. Reverse sensitivity issues from spray drift can pose adverse health effects.	
Decision Requested: Should PC14 be confirmed, PHS strongly recommends considering measures that acknowledge and mitigate reverse sensitivity of spray drift effects from neighbouring orchards. These should include a buffer distance of at least 100 metres between the boundary of orchard activity and any residential activity.	