Submission 93
Community and Public Health – A Division of the Canterbury District Health Board

Summary of Evidence Provided

1. My name is Stewart Fletcher and together with Doctor Wendy Williamson we have provided evidence in support of Submission No. 93 which was lodged by Community and Public Health which is a division of the Canterbury District Health Board (CDHB).

2. Today we are also joined by the Canterbury Medical Officer of Health, Doctor Alistair Humphrey, as representative of the CDHB, who like ourselves is available to respond to any questions the Hearings Panel may have.

3. The CDHB have been actively involved in providing comments on the various versions of the LWRP as it has moved through the consultation process.

4. It is understood that all evidence will be taken as read and the Hearings Panel has had the opportunity to review the evidence and submission as lodged. Today we are not here to present anything new and instead I will provide a basic outline of the evidence provided and then we would welcome the opportunity to assist the Hearings Panel with any questions they may have.

5. The original submission covered a number of points – 31 in total. Through the evidence provided, three key areas were identified.

- Referencing Other Documents
- Contaminant Effects on Drinking and Recreational Water
- Centralised Wastewater Disposal Systems

Referencing Other Documents

6. The LWRP is not a standalone document, it has been developed in reference to a number of other publications, plans and related material. Likewise, in certain circumstances, the LWRP is not the only document a person may have to refer to in relation to a specific proposal or development.
7. It is recommended that better reference to related documents should be made. This provides an ability to demonstrate that the LWRP is based on, and is consistent with, related documents. In addition clear linkages with these documents should be included in the LWRP to assist when referring to other requirements. Examples of documents that should be referred to include, but are not limited to:

- The Canterbury Water Management Strategy
- The National Environmental Standard for Sources of Human Drinking Water Regulations 2007
- Health (Drinking Water) Amendment Act 2007
- Guidelines for separation distances based on virus transport between on-site domestic wastewater systems and wells (ESR 2010).
- Environmental Standard for Drilling Soil and Rock (NZS 4411)
- Zonal Implementation Plans

8. To assist the Hearings Panel the evidence provided has identified specific wording and where that wording should be inserted into the plan. The Panel are encouraged to consider if there are other documents which should also be referred to in the LWRP. Also the Panel should consider if there are other locations within the LWRP where such references could also be cited.

9. In reference to the above, the evidence provided does not change the meaning of the LWRP and its various provisions and requirements. Rather it is recommended that the LWRP become a more robust and usable document through more comprehensive use of references.

Contaminant Effects on Drinking and Recreational Water

10. The submission and evidence provided has identified the issue around cyanobacteria and its importance in relation to drinking water and human health. The identification of this issue arises from a narrative statement in Tables 1a and 1b which reads:

"Toxin-producing cyanobacteria shall not render the river unsuitable for recreation or animal drinking-water."
11. The physical change to the LWRP sought by the CDHB is the insertion of the words "human and" before the word animal. In seeking this change it is noted that if a river is not suitable for animal drinking water due to cyanobacteria, it will not be suitable for human drinking water.

12. It is the opinion of the CDHB that cyanobacteria are a matter best addressed before it becomes an issue - prevention is better than a cure. The issues around cyanobacteria and the effects they can have on human drinking water should be reflected in the LWRP. To support this view the evidence provided includes information about the issues around cyanobacteria. This includes that Canterbury drinking water supplies include a number of surface water takes where the treating of drinking water that contains cyanobacteria would be difficult and expensive.

Centralised Wastewater Disposal Systems

13. As smaller settlements around Canterbury grow, and Christchurch expands westward following the earthquakes, increased consideration needs to be given to the disposal of wastewater. Although this is not a new issue, the growth in the population of settlements around Canterbury has reached a level where the issue must be dealt with as an imperative. When a site is developed for residential purposes the typical assumption can be that an onsite wastewater disposal system will suffice, but in some areas we are getting to the point where the number and density of systems is having detrimental effects on groundwater water and drinking water supplies.

14. There is a difficult balance for Territorial Authorities and how they manage this issue but better measures need to be put in place to ensure ground water and drinking water systems are safe.

15. The evidence produced has identified the significant issues that can arise from domestic onsite wastewater treatment systems including their failure. Consideration should be given to additional measures or alternative options for the disposal of wastewater. It is recognised that there is no perfect solution as every area is different and in some areas on site wastewater systems may be working. Accordingly a single solution is not proposed but instead a mechanism or trigger is recommended to be included in the LWRP which requires this issue to be considered and, where necessary, measures are included to address this.
16. The incorporation of an additional rule and policy is recommended. The suggested wording accommodates various options and solutions and will essentially provide better consideration of the disposal of wastewater.

17. In addition the CDHB is in discussions with Environment Canterbury and District Councils regarding this matter. The CDHB is exploring the development of a protocol between the different authorities as to when consideration should be given to improvements in wastewater treatment systems including reticulated systems. The incorporation of the proposed amendments will compliment this process.

Conclusion

18. The Canterbury District Health Board has an obligation under the Health and Disability Act 2000 to improve, promote, and protect the health of people and communities (section 22a) and to promote the reduction of adverse social and environmental effects on the health of people and communities (Section 23h). Specifically, the purpose of part 2A of the Health Act 1956 is to protect the health and safety of people and communities by promoting adequate supplies of safe drinking water from all drinking-water supplies, and defines the responsibilities for suppliers (including local authorities) under the authority of the Medical Officer of Health as a designated officer of the Ministry of Health. The LWRP should complement these legal obligations.

19. CDHB is supportive of the LWRP. Submission points made are focused on specific aspects where amendments will assist in ensuring the Plan supports legal obligations.

Key recommendations are:

- That better reference to other documentation should be included in the plan;
- The effects of cyanobacteria on human drinking water should be considered; and
- The LWRP should provide leadership in addressing and encouraging improvements in wastewater disposal.