

Submission 93**Community and Public Health – A Division of the Canterbury District Health Board****Summary of Evidence Provided – Hearing Group 2**

1. My name is Stewart Fletcher and I 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 and Doctor Lee Burbery who is a Senior Groundwater Scientist with the Institute of Environmental Science and Research. Alistair and Lee, like myself are 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. The evidence provided in the first hearing group covered several points and this evidence being considered today for the second group of hearings has addressed a further ten of these points.
6. The section 42A report for this hearing has proposed significant changes to the various relevant provisions in the LWRP. The evidence provided has focused on those changes and specifically refers to the suggested amendments rather than the original provisions of the LWRP. The recommended amendments in the section 42A report are generally seen as positive and go some way to address the issues raised in the original submission.
7. Through the evidence provided for this hearing, two key areas have been identified.

- Nutrient Discharges
- Farm Environment Plans

Nutrient Discharges

8. In reviewing the various nutrient related objectives and policies, the evidence encourages amendments to policies 4.29 and 4.32.
9. Policy 4.29 includes prioritising the improvement of higher nutrient risk activities in the catchments of water bodies that are more sensitive to increases in nutrients. The evidence suggests additional wording could be included to further encourage a reduction in nutrient discharges. This would also bring about a better consistency between Policies 4.29 and 4.30.
10. It is also sought that groundwater recharge areas are specifically referred to in Policy 4.29. This is to ensure better consideration of groundwater occurs when considering effects on more sensitive waterbodies.
11. Suggested wording for how Policy 4.29 could be amended to address these two concerns is included at Paragraph 3.6 of the evidence.
12. Policy 4.32 identifies that, within specific areas, a changed or new farming activity shall not result in a net increase in nutrient discharges or, alternatively advanced mitigation practices are applied such that the property operates in the top 10% of nutrient discharge minimisation practices. The evidence identifies that under this policy it would be possible to increase nutrient discharges on a property due to a change of use. For example a new dairy farm incorporating significant measures to control nutrient discharges, and accordingly fall within the top 10%, would generate higher levels of nutrient discharge when compared to other activities such as a sheep farm.
13. It is considered that the overall intention of policies in the LWRP, including Policies 4.28 – 4.30 is to minimise and reduce nutrient discharges. On this basis it has been recommended Policy 4.32 is amended and the suggested wording is included at Paragraph 3.8 of the evidence.

14. In reviewing the section 42A report it was also noted that a definition is proposed to be included in the LWRP with regards to advanced mitigation measures. To assist the Committee it has been suggested that denitrifying bio reactive barriers could also be included in such a list. The evidence explains what these barriers are and why they should be included. Importantly this type of barrier provides a modern technique that can have advantages over other options and is relevant to be included in such a list.

Farm Environment Plans

15. The section 42A report recommends significant amendments to the provisions of the LWRP relating to Farm Environment Plans. The evidence is supportive of these changes and suggests only one amendment being the inclusion of better reference to groundwater. The inclusion of better reference to groundwater is for the same reasons as discussed in paragraphs 3.4 – 3.6 of the evidence in reference to Policy 4.29. Amendments to wording are included in paragraph 4.3 of the evidence.
16. As also per the evidence, the CDHB is strongly supportive of Rule 5.41 of which requires a farm environment plan for high nutrient risk farming activities in areas coloured red on the Series A Planning Maps. The reason for this support is that it is considered the inclusion of such a requirement will assist in addressing potential adverse effects on groundwater recharge areas. If such a rule was not included, the CDHB would be actively seeking the inclusion of reference to groundwater recharge areas in much the same way as Lake Zones, as an area automatically requiring a Farm Environment Plan.

Conclusion

17. 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.

18. 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.
19. Key recommendations are that better reference is included in the LWRP as to the reduction of nutrient discharges and better reference to groundwater is included in relevant provisions of the LWRP.