

**Janel Hau**

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**From:** Matt Willoughby <Matt.Willoughby@cdhb.health.nz>  
**Sent:** Friday, 21 March 2014 4:32 p.m.  
**To:** Mailroom Mailbox  
**Cc:** Alistair Humphrey  
**Subject:** CDHB Submission on Variation 1 to the Land and Water Regional Plan  
**Attachments:** CDHBSubmission\_Variation1\_LWRP.pdf  
  
**Categories:** Purple Category

To Whom it May Concern,

Please find attached the CDHB Submission on Variation 1 to the Land and Water Regional Plan

Regards,

**Matt Willoughby**  
Health Protection Officer (Trainee)  
*Environment Team*  
Community and Public Health  
Canterbury District Health Board



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# Canterbury

District Health Board

Te Poari Hauora o Waitaha

## Submission from Community and Public Health Division

### Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan

**Person Making Submission**

Medical Officer of Health  
Canterbury District Health Board

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**General comment**

Community & Public Health (CPH) welcomes the opportunity to comment on the Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan. The health and wellbeing of current and future generations of Cantabrians is paramount and should always take priority in water management decisions, particularly where there are competing interests for water uses.

#### 4 Amendments to Section 11 – Selwyn - Waihora

Community and Public Health acknowledge that the actions identified by the collaborative planning process will not achieve the catchment vision ‘To restore the mauri of Te Waihora while maintaining the prosperous land based economy and thriving communities’. Selwyn Waihora is not currently achieving all its freshwater objectives and water quality is anticipated to get worse before it gets better.

##### 11.5.8 -11.5.9 Nutrient Management, Sediment and Microbial Contaminants

Community and Public Health is supportive of the nitrogen loss calculation (not exceeding 15 kg per hectare per annum) being more restrictive than the equivalent rule within the Land and Water Regional Plan (not exceeding 20 kg per hectare per annum) and therefore requiring resource consent (from 2017) for the use of land not meeting this criteria. This recognises the currently degraded water quality within this catchment.

##### 11.6 Fresh Water Outcomes

In reference to tables 11(a) and 11(b) *Freshwater Outcomes for Selwyn Waihora Catchment Rivers* and *Freshwater Outcomes for Selwyn Waihora Catchment Lakes* it is noted the term “no set value” is used in relation to some of the microbiological indicators for *suitability for contact recreation*. Whilst it is acknowledged that the recreational water quality may be poor in these areas, avoiding setting a value means there is no incentive to improve the quality at these locations.

**Recommendation:** That the following statement replaces “no set value” in tables 11(a) and 11(b) under microbiological indicator: “good/fair” or “improvement on current status”.

In table 11(a) under Periphyton indicators there are no values for cyanobacteria mat cover (%) as there are in the Land and Water Regional Plan. It is recommended these are included in the aforementioned table. Cyanobacteria coverage is very important for public health in terms of suitability of a river for contact recreation and also the suitability of a river as a drinking water source. The Selwyn River for example has suffered from cyanobacterial blooms in recent years and the plan should seek to address this by setting limits. Policy 11.4 states that the policies of the sub regional plan apply in addition to the policies set out in section 4 of the Land and Water Regional Plan. In policy 4.4 of the aforementioned plan it states “ *Surface water bodies are managed so that toxin producing cyanobacteria do not*

render rivers or lakes unsuitable for recreation or human and animal drinking water.” We therefore recommend that effective limits are set at a level protective of public health.

**Recommendation:** That table 1(a) includes values for cyanobacteria mat cover (%) at values which are equivalent of or better quality than in the Land and Water Regional Plan. Lower values should be set for rivers that are utilised for sources of human drinking water or are important recreational sites.

### 11.7.3 Water Quality Limits and Targets

The Water Quality Target set for nitrate-N in groundwater (*table 11(m)*) for the Selwyn Waihora area at 8.5mg/L exceeds half the maximum acceptable value (MAV). Whilst CPH realise this value takes into account the expected levels revealed by modelling and caused by past activities we recommend that the long term target should aim for half the MAV. The drinking water target in the Canterbury Water Management Strategy is to have average annual nitrate levels in all ground water wells in Canterbury below 50% of the Maximum Acceptable Value for drinking water by 2040.

CPH accepts that for the first 5 years, the 5 year annual average concentration be set at 8.5mg/L nitrate nitrogen however recommend the table is amended to require the limit of 5.6mg/L nitrate nitrogen to be met in the longer term in line with the Canterbury Water Management Strategy targets.

**Recommendation:** That table 11(m) is amended to include a longer term target of 5.6mg/L nitrate nitrogen annual average concentration in line with the drinking water target for 2040 in relation to ground water wells in Canterbury under the Canterbury Water Management Strategy.

We are supportive of the < 1 organism/100 ml E coli for ground water.

**I wish to be heard in support of my submission**

A handwritten signature in black ink that reads "A.R.G. Humphrey". The signature is written in a cursive style and is positioned above a large, hand-drawn, irregular loop that serves as a flourish or underline.

Dr Alistair Humphrey  
**Medical Officer of Health**

Date: 21<sup>st</sup> March 2014