

From: [Denise Tully](#)
To: [Mailroom Mailbox](#)
Cc: [CPH Risk Management Committee \(Identification\)](#)
Subject: Plan change 4 to proposed Land and Water Regional Plan - Submission
Date: Monday, 12 October 2015 4:03:15 p.m.
Attachments: [submission-form.pdf](#)

Please find attached the submission of the Canterbury District Health Board to variation 4 to the proposed Land and Water Regional Plan

Regards
Denise

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Check out our web site: <http://www.cdhb.health.nz>
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Submitter ID: _____

File No: _____

Submission on the Proposed Canterbury Regional Policy Statement 2011

**Form 5: Submissions on a Publicly Notified Proposed Policy
Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991**

Return your signed submission by 5.00pm, 15 August 2011 to:

Freepost 1201
Proposed Canterbury Regional Policy Statement
Environment Canterbury
P O Box 345
Christchurch 8140

A

Full Name: Dr Alistair Humphrey _____ **Phone (Hm):** _____

Organisation*: Canterbury District Health Board _____ **Phone (Wk):** 3786726 _____

* the organisation that this submission is made on behalf of

Postal Address: Community & Public Health, PO Box 1475, Christchurch _____

Phone (Cell): 0274582552 _____

Postcode: 8140 _____

Email: denise.tully@cdhb.health.nz _____ **Fax:** _____

Contact name and postal address for service of person making submission (if different from above):

Denise Tully, address as above

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

I could not gain an advantage in trade competition through this submission; or

I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

I am directly affected by an effect of the subject matter of the submission

I am not directly affected by an effect of the subject matter of the submission

Signature: A. R. G. Humphrey _____ **Date:** 12th October 2015 _____

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

B I do not wish to be heard in support of my submission; or
 I do wish to be heard in support of my submission; and if so,
 I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

C (1) The specific provisions of the proposal that my submission relates to are:		(2) My submission is that:		(3) I seek the following decisions from Environment Canterbury:
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
2.9, page 2-2	Definitions	Support	Canterbury District Health Board (CDHB) supports the removal of Group drinking water supply and the change to the definition of community drinking-water supply. The definition correlates well with the relevant drinking water supply definitions in the Health (drinking water) Amendment Act 2007 and therefore will allow improved efficiency in the sharing of registration information between Canterbury Regional Council and CDHB.	Retain the change to definitions of removing Group drinking water supply definition and the amendment to community drinking water supply.
4.13, page 4-5	Discharge of contaminants to land or to water	Support	CDHB agrees with the addition of (ii) which states “as a second priority, does not result in any further degradation in water quality any receiving surface waterbody that does not meet the water quality standards in Schedule 5 or any applicable water conservation order”. CDHB supports policy which aims to prevent further decline in water quality.	Retain the addition of (ii) to 4.13 (e)
4.23, 4.23A, 4.23B, pages 4-6	Protect sources of drinking water	Support in part	<p>It is important to acknowledge that if community drinking water supplies are protected so they align with the Canterbury Water Management Strategy (CWMS) drinking water targets and meet the Drinking Water Standards for New Zealand 2005(revised 2008) (DWSNZ05/08) we should also acknowledge that community supplies are a first order priority under the CWMS. The targets specifically <i>state</i> “For communities that currently have access to untreated and safe drinking water, implement actions to ensure source water quality remains high enough to meet current New Zealand Drinking Water Standards without treatment.</p> <p><i>Prevent further decline in source water quality for communities that currently have to treat drinking water, such that this requires increased level of treatment or monitoring requirements.</i></p> <p>It is therefore imperative that measures are taken to protect those sources of human drinking water. Community water supplies are essential to public health and need to be prioritised over all other uses.</p>	Support the addition of 4.23A and 4.23B however remove c from 4.23B
4.31, page 4-7	Livestock exclusion from waterways	Support in part	CDHB strongly recommends this section is amended to include exclusion of stock from close proximity of community drinking water supply intake sites. The regional council should apply an approach consistent with other policies in the LWRP (such as the approach for discharge of drainage water) and prohibit the discharge of contaminants caused by stock access, within community drinking water supply protection zones (as defined in schedule 1 for surface waters).	Amend 4.31(b) to read the following: “excluding stock from the waterbody bed and banks within 1000m upstream and 100m downstream of freshwater bathing sites listed in schedule 6 within community drinking water supply protection zones, as set out in Schedule 1, inanga and salmon spawning sites listed in Schedule 17 and other sensitive waterbody areas and the waterbody bed and banks closely adjacent to these areas;and”

5.94A, B & C, page 5-10	Construction phase stormwater		5.94A is a permitted activity provided the stated conditions are met. If the discharge is into an area where there is a drinking water take , particularly for a surface water supply, the increase in turbidity may impact on the possible treatment processes in place for that water. It is noted that the actual and potential effects of the discharge on the quality and safety of human and animal drinking water is only a matter for consideration if one or more of the stated conditions is not met. CDHB recommends that the set back distances as described in schedule 1 are invoked for any water supply intake which may be in the region of such a discharge.	Include under 5.94A as number 6, the following: “ The discharge does not occur within the stated set back distances of a drinking water supply intake as specified in schedule 1.
5.115 page 5-16	Small and Community Water Takes	Oppose in part	One of the areas included in the exercise of discretion is <i>“the actual and potential effects on any land user with land located within the proposed community drinking water supply protection zone”</i> This requirement appears to be over and above those applied to water users who can take more than 10m3 per property per day where as community drinking water supplies are first order priority according to the Canterbury Water Management Strategy. We recommend this requirement is removed.	Remove item 9 under the exercise of discretion.

<p>Schedule 8 page 16-5</p>	<p>Region-wide Water Quality Limits</p>	<p>Oppose</p>	<p>The limit for <i>E coli</i> in ground water remains <1 organism/100ml. CDHB do not agree with the associated statement regarding compliance with the limit which reads: <i>“if less than one organism is detected in fewer than 50% of the samples, the limit is considered to be met”</i>. So this statement means that if some organisms are detected in greater than 50% of samples the limit is considered to be met. This does not make good sense and CDHB totally disagree with the statement. This could mean that if over half the samples have over 1000 <i>E coli</i>, for example, the limit is met. There is no qualification of acceptable levels of E coli in each sample (in terms of infectivity and the risk to public health having 1 or 10 or 1000Ecoli has quite a different outcome).</p> <p>Additionally the second statement reads: <i>“If one or more organism is detected in 50% or more of the samples the sampling regime is to be repeated within 5 days. If one or more organism is detected in any of the repeated samples, the limit is considered to be breached.”</i> This effectively overrides the limit of <1 <i>E coli</i>/100ml.. The first statement allows over 50% of samples to non comply (and still meet compliance) and the second statement provides a second opportunity to comply with the limit even if over 50% of samples don't comply in the first sampling round.</p> <p>There is no consideration given to either the level of contamination or to the depth of the groundwater affected by contamination. Shallow ground water (less than 30m below the water table in an unconfined aquifer) could on occasions be expected to have contamination but deep ground water (greater than 30m depth) which is found to contain <i>E coli</i>, would be of concern.</p> <p>E coli levels above 10 <i>E coli</i>/100ml would also be very concerning in shallow ground water, especially if the water is used as a source of drinking water for communities or individuals. If the originally proposed limit of <1 <i>E coli</i>/100ml is considered too restrictive then consideration should be given to differentiation between shallow and deep groundwater. It needs to be noted however that if <i>E. coli</i> is found in ground water that is used for drinking it is of concern regardless of what the Regional Council determine to include in the LWRP and water which contains <i>E coli</i> will need to be boiled to make it safe to drink.</p>	<p>Remove both statements listed under sub-note 4. For shallow groundwater a target level could be considered of <1 <i>E coli</i>/100ml .</p>
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