

Proposed South Taranaki District Plan

SUBMISSION FORM

Form 5, Clause 6 of First Schedule, Resource Management Act 1991

Please note: all sections of the following form need to be completed



SUBMITTER DETAILS

Full name of submitter: *Matthew Parkinson*

Organisation Name (if applicable): *TARANAKI DISTRICT HEALTH BOARD*

Postal Address for Service: *PRIVATE BAG 2016, NEW*

PLYMOUTH 4520 Telephone: *(06) 753 7798*

Email: *Matthew.Parkinson@tdhb.org.nz*

Contact Person (name and designation, if applicable): *Matthew*

Parkinson, Service Manager - Public Health

SCOPE OF SUBMISSION

This is a submission on the Proposed South Taranaki District Plan.

The specific provisions that my submission relates to are: [Please identify the specific parts of the Proposed Plan]

Provision(s) (e.g. objective, rule) or: *Please refer to attached*

Submission

Property Address: Or.....

.....

Map, or.....

.....

Other (specify).....

.....

SUBMISSION

My submission is: [Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views].

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions above amended yes no

The reasons for my views are: *Please refer to attached*

Submission

.....

.....

..... [you can attach additional pages if necessary]

Proposed South Taranaki District Plan

SUBMISSION FORM

Form 5, Clause 6 of First Schedule, Resource Management Act 1991



I seek the following decision from the South Taranaki District Council:

- Accept the Proposed Plan
- Accept the Proposed Plan with amendments as outlined below
- Decline the Proposed Plan

If the Proposed Plan is not declined, then amend it as outlined below: *Please*

refer to attached Submission

I wish to be heard in support of my submission yes no

If others make a similar submission, I will consider presenting a joint case with them at a hearing yes no

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act.

I could could not (circle one) gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission, please complete the following:

I am/am not (circle one) directly affected by an effect of the subject matter of this submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

[Handwritten Signature]

Signature of submitter

(or person authorised to sign on behalf of submitter)

(A signature is not required if you make your submission by email)

Date *12/10/2015*

Notes to person making submission:

Please note that your contact details and phone number will be publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the council.

COMMUNICATIONS CONTACTS:

Emailed to: districtplanreview@stdc.govt.nz

Posted to: South Taranaki District Council, Private Bag 902, Hawera 4640

Delivered to: South Taranaki District Council, 105-111 Albion Street, Hawera

OFFICE USE ONLY

Submitter Number:

Receipt Date:

STANDARD OFFICE HOURS: MONDAY 12 OCTOBER 2015.



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Stratford Health Centre
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Opunake Health Centre
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**Patea + Waverley Districts
Health Centre**
Telephone 06 273 8088

Waitara Health Centre
Telephone 06 754 7150

Mokau Health Centre
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12 October 2015

South Taranaki District Council

Proposed South Taranaki District Plan - Submission

PO Box 902

Hawera 4640

Email: districtplanreview@stdc.govt.nz

Submissions close 12 October 2015

South Taranaki District Council – Proposed South Taranaki District Plan - Submission

1 Submitter Details:

Full name of Submitter: Dr Jonathan Jarman and Matthew Parkinson
Organisation Name: Public Health Unit, Taranaki District Health Board
Postal Address for Service: Private Bag 2016, New Plymouth
Telephone: 06 7537798
Email: Matthew.Parkinson@tdhb.org.nz
Contact person: Matthew Parkinson, Service Manager- Public Health Unit

2. Submission

Scope of Submission

This is a submission on the **Proposed South Taranaki District Plan**.

The specific provisions that our submission relates to are:

- a) Section 1.11 - DEFINITIONS
- b) Section 1.2.2 - RELATIONSHIP WITH OTHER PLANS AND POLICIES
- c) Section 20 - RESOURCE CONSENT INFORMATION REQUIREMENTS AND ASSESSMENT MATTERS



The Public Health Unit of the Taranaki District Health Board (DHB) welcomes the opportunity to submit on the South Taranaki District Council's (STDC) District Plan. The key functions of the Public Health Unit are to improve, promote and protect the health of the population of the Taranaki. We also have a role in addressing health inequalities, influencing health determinants and supporting the development of sustainable, healthy communities.

The work of the STDC also has a strong influence on the health of its citizens. We look forward to continuing our work with STDC in the future to benefit the health of the South Taranaki District.

In our submission, the following comments and suggestions are made for your consideration. The Taranaki DHB Public Health Unit wish to have the provisions identified below amended:

- a) Section 1.11 - DEFINITIONS
- b) Section 1.2.2 - RELATIONSHIP WITH OTHER PLANS AND POLICIES
- c) Section 20 - RESOURCE CONSENT INFORMATION REQUIREMENTS AND ASSESSMENT MATTERS

A) Section 1.11 DEFINITIONS

Certain groups of people are more vulnerable to adverse health effects from environmental hazards. These groups of people normally include young children, pregnant women, the elderly and those with chronic health conditions.

It is recommended that:

- (a) The definition for "Healthcare Services" includes midwives; and
- (b) The definition for "**Sensitive Activity**" is amended to further include "Childcare Facility", "Home Based Childcare Service(s)", "Residential Care Facility", and "Healthcare Services".

The proposed amendments to the definitions listed above will aid in ensuring that the health of vulnerable persons are identified, and their needs considered with regard to future decisions made under the 'District Plan'.

B) Section 1.2.2 - RELATIONSHIP WITH OTHER PLANS AND POLICIES

The management of natural and physical resources can at times impact on the health of the public. The STDC has obligations under the Health Act 1956 to protect the public health within its district. There are two parts of the Health Act 1956 which are relevant to activities described in the Proposed South Taranaki District Plan – the environmental health sections of the Act (Part 2 – Powers and Duties of local authorities) and drinking water (Part 2A – Drinking Water). We believe that it is important that this Act is acknowledged in the Proposed South Taranaki District Plan.

Health Act 1956

Environmental Health – Powers and Duties of local authorities

It is the duty of every local authority to improve, promote, and protect public health within its district under section 23 of the Health Act 1956. Local authorities are empowered and directed to carry out a number of activities including:

23(b) to cause inspection of its district to be regularly made for the purpose of ascertaining if any nuisances, or any conditions likely to be injurious to health or offensive, exist in the district

23(c) if satisfied that any nuisance, or any condition likely to be injurious to health or offensive, exists in the district, to cause all proper steps to be taken to secure the abatement of the nuisance or the removal of the condition

Nuisances are defined as environmental conditions which are offensive or likely to be injurious to health (section 29). There are penalties for permitting or causing statutory nuisances (section 30).

Many activities covered by the Proposed South Taranaki District Plan have the potential to be offensive or injurious to health. At times these environmental activities can be an offence under the Health Act 1956 without necessarily being an offence under other legislation such as the Resource Management Act 1991 or the Hazardous Substances and New Organisms Act 1996. In these situations it is the duty of the STDC to cause all proper steps are taken to secure the abatement of the nuisance or removal of the condition.

It is recommended that:

- There is a section added to provision - **1.2.2 Relationship with Other Plans and Policies** - which describes the environmental health section and the obligations of the STDC under the Health Act 1956.
- There is greater mention of public health in the various sections throughout the Proposed South Taranaki District Plan when talking about Adverse Effects of certain environmental activities

C) Section 20 – RESOURCE CONSENT INFORMATION REQUIREMENTS AND ASSESSMENT MATTERS

Drinking-Water – Specific requirements for Water Suppliers under the Health Act 1956 and the National Environmental Standard for Sources of Human Drinking Water (NES)

The Health Act 1956 was amended by the Health (Drinking Water) Amendment Act in October 2007. The aim of the amendment was to protect public health by improving the quality of drinking-water provided to communities. Water suppliers have a number of duties required by the Health Act 1956 including; being required to take reasonable steps to contribute to the protection of source of drinking-water (section 69U).

The Health Act 1956 also describes matters where offences can be created such as it is an offence to contravene or permit a contravention to the duty to protect the source of drinking-water (section 69ZZR).

There are also other responsibilities that the STDC has in regards to the protection of water sources used for human drinking-water. This includes the “National Environmental Standard for Sources of Human Drinking Water (NES) 2007”. Section 1.2.2 – Relationship with other plans

and policies – requires STDC to give effect to such documents (National Standards and Regulations) in the development of the Proposed South Taranaki District Plan.

The Proposed South Taranaki District Plan currently identifies water bodies used for ‘urban water supplies’ within Schedule 5 of the plan. However this does not appear to reflect the importance of source water used for human drinking water, or use consistent terminology for sources of human drinking water as specified under the NES.

It is also noted that the protection of sources of human drinking water is not consistently identified as a key (important) assessment matter associated with the activities listed throughout Section 20 - RESOURCE CONSENT INFORMATION REQUIREMENTS AND ASSESSMENT MATTERS – of the Proposed South Taranaki District Plan.

It is recommended that:

- Schedule 5 - Is amended to specifically ensure the provision and protection of ‘Sources of Human Drinking Water’ as required by the ‘National Environmental Standard for Sources of Human Drinking Water’, AND conditions relating to potable water as required by the Health Act 1956.
- Section 20 Resource Consent Information Requirements and Assessment Matters - The Proposed South Taranaki District Plan includes the following matter as a specific requirement throughout this section *“Avoids adverse effects on water bodies (sources) where the water is used for potable human drinking water”* where applicable.

If you have any questions relating to this submission please feel free to contact Dr Jonathan Jarman or Matthew Parkinson at the Public Health Unit.

3. We seek the following decision from the South Taranaki District Council:
 - Accept the Proposed Plan with amendments as outlined above.
4. We wish to be heard in support of my submission - No
If others make a similar submission, we will consider presenting a joint case with them at a hearing. - No
5. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act.
 - We could not gain an advantage in trade competition through this submission

Yours sincerely



Dr Jonathan Jarman
Medical Officer of Health



Matthew Parkinson
Service Manager – Public Health