

**Canterbury**

**District Health Board**

Te Poari Hauora o Waitaha



**Submission from  
Canterbury District Health Board  
(Community and Public Health Division)**

**January 2015**

**Memorial Business Park  
Private Plan Change Request (Proposal)**

## Introduction:

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The Canterbury District Health Board (CDHB) welcomes the opportunity to comment on the Proposed Memorial Business Park Private Plan Change Request (the Plan). The reasons for making this submission are to promote the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. The CDHB's vision is to promote, enhance and facilitate the health and wellbeing of the people of the Canterbury District.

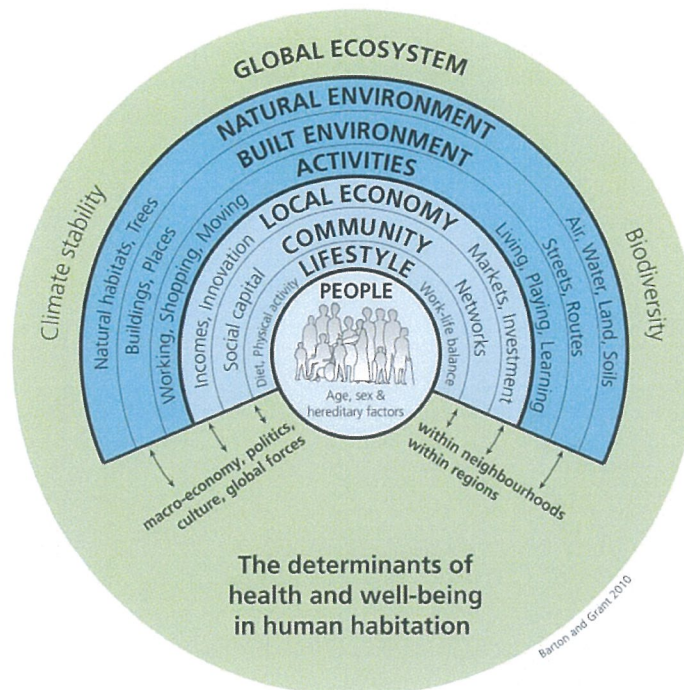
A community's health and wellbeing is primarily determined by social, cultural, economic and environmental factors which lie outside and beyond the control of the health sector. These influences are described as the conditions in which people are born, grow, live, work and age and are attributed to environmental, social and behavioural factors.<sup>1</sup> Sectors responsible for these factors have great scope to influence the health of a population through their policies, plans and programmes. It is therefore essential that organisations and groups beyond the health sector, such as local government, consider how planned initiatives might (or might not) improve the health and wellbeing of populations.

This concept of public health is acknowledged by the inclusion of public health considerations in legislation such as in the Local Government Act 2012 and the Resource Management Act 1991 (RMA). The CDHB acknowledge the Resource Management Act 1991 (RMA) as legislation that significantly impacts on how people and communities manage their natural and physical resources to provide for their social, economic and cultural wellbeing [s5 (2)]. The CDHB recognise that public policy plays a significant role in shaping the health of populations. Policies that enable all to contribute to the social, economic and cultural life of their society will result in healthier communities than those where people face insecurity, exclusion and deprivation. The diagram<sup>2</sup> below shows how the influences on health are interlinked:

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<sup>1</sup> Public Health Advisory Committee. 2004. The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health. Public Health Advisory Committee: Wellington.

<sup>2</sup> Barton, H and Grant, M. (2006) A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>



## Specific comments

### Land Contamination

Point 10.1 in the Assessment of Environmental Effects states that, 'the NES (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) is not applicable at the plan change stage but will apply on the subdivision and development of the site to give effect to the business zoning'. There is also a statement in the Preliminary Site Investigation (PSI) that the risk from the proposed change of use is highly unlikely to cause harm to human health.

However, there are two council documents in the appendices, each relating to the establishment of nursery operations on the site. The PSI does not adequately cover the potential for risk from the application of pesticides if either of these operations were actually established. The CDHB disagrees with the applicant's assessment that the activity is permitted under the NES as the potential risk has not been adequately investigated to form a conclusion that it's highly unlikely to cause harm to humans.

**Recommendation:** that the NES does apply at the plan change stage as there is potential for contamination from the application of persistent pesticides therefore a full assessment of the risk is specified as a condition of the development.

### Location over unconfined aquifer

The site is located over an unconfined aquifer that contributes to the untreated sources of water used to supply both the drinking water supplies of Northwest Christchurch. The proposed use of the site will result in higher volumes of stormwater being generated and a change in the type of contaminants discharged, which will include suspended solids, heavy metals and hydrocarbons. The application does not indicate the proposed stormwater

treatment devices to be used. We note that the Environment Court has taken the view that development can only proceed over an unconfined aquifer where a high level of stormwater treatment is undertaken.

**Recommendation:** that a high level of stormwater treatment be specified as a condition of the development.

### **Drinking Water Supply**

The application states that there are currently inadequate drinking water flows and pressure and that a new pipe therefore needs to be laid to improve reliability of service. However, there does not appear to be any official agreement on this matter.

**Recommendation:** that the installation of the additional infrastructure to supply adequate quantities of drinking water is specified as a condition of the development.

### **Sewage disposal**

The application states that there is currently insufficient capacity in the Christchurch City network to meet the demands of the development and that the council will not be able to provide capacity until 2019. It is acknowledged that a 'hold until night release' has been used in an industrial subdivision in Hornby.

**Support:** that a temporary solution for the appropriate disposal of sewage is specified as a condition of the development.

### **Stormwater retention**

The application has acknowledged the need to avoid standing water, in view of the proximity of the site to the airport and the attraction to wildlife. Further, that swales and basins are to be restricted. The association between standing water and the potential provision of habitats for mosquitos has not been recognised. The construction of any water body has the potential to create a habitat for unwanted pest species such as mosquitoes. Mosquitoes impose two health risks, one being nuisance biting. The other is the vectoring of diseases such as malaria, Ross River Virus, West Nile Virus, Dengue and Chikungunya. This could be an issue given the proximity of the site to the airport and the potential entry of exotic mosquitoes into the country.

**Recommendation:** that standing water at the site is restricted in order to avoid not only attracting wildlife but also the creation of potential mosquito habitats.

### **Urban design**

It is noted in point 1.8b of the AEE that there is provision for buildings on the 'boundaries' of the zone to be subject to specific urban design criteria assessment. We encourage the application of the universal design principles to be integral within the whole development in order that the development is accessible to all users.

**Recommendation:** that the compliance with universal design principles is specified as a condition of the development.

**Support:** the integration of Crime Prevention through Environmental Design (CPTED)<sup>3</sup> principles into the design guidelines.

**Support:** the creation of a well-connected street design that caters for all mode users especially pedestrians and cyclists.

**Support:** the inclusion of open spaces that encourage a pedestrian friendly environment.

The submitter does not wish to be heard in support of this submission.

## Details of Submitter

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**Person Making Submission**

Dr Alistair Humphrey  
Public Health Physician,  
Canterbury District Health Board

**Postal Address**

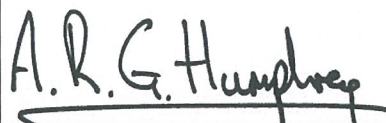
Community and Public Health  
Canterbury District Health Board  
PO Box 1475  
Christchurch 8140

**Phone** 03 3786 725

**Fax** 03 379 6125

**Contact Person for this application:** Alizon Paterson

**Email:** alizon.paterson@cdhb.health.nz

  
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Dr. Alistair Humphrey MPH FAFPHM  
Public Health Physician

Date: 26<sup>th</sup> January 2015

<sup>3</sup> <http://ccc.govt.nz/cityleisure/communityservices/designoutcrime/index.aspx>