

MIDCENTRAL PUBLIC HEALTH SERVICE ORAL SUBMISSIONS FOR PROPOSED PLAN CHANGE 51: GROWTH PRECINCT 4 AND NEW DISTRICT PLAN STRUCTURE.

My name is Andrew Watt, I am a Designated health Protection Officer, I appear today for MidCentral Public Health Service

Which made submissions on this proposed plan change 51: Growth Precinct 4 and New District Plan Structure.

My remarks made today do not include legal submissions.

I do not appear as an expert witness.

My colleague Peter Wood, also a Health Protection Officer, will assist answering any questions you have. Peter also does not appear as an expert witness.

I will not repeat what is stated in our written submission other than to summarise our interest in this proposed Plan Change 51: Growth Precinct 4 and new District Plan Structure.

Midcentral Public Health Service has a neutral stance as to whether or not this propose plan change proceeds.

Our only concern is that if granted, conditions of the propose plan change should be adequate to avoid, remedy and mitigate potential adverse health effects on the health of people and communities.

The reason for our submission generally is to promote the reduction of adverse environmental effects on the health of people and communities. To improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

These statutory obligations are the responsibility of the Ministry of Health. In the MidCentral district these obligations are carried out under contract by the MidCentral Public Health Service, under crown funding agreements, on behalf of the MidCentral District Health Board.

The Ministry of Health requires MidCentral Public Health Service to reduce any potential health risks by means including submissions on propose plan changes to ensure matters of public health significance are adequately considered by consent authorities.

Future development undertaken under this proposed plan change has the potential to create some adverse effects on the health of people and communities in the vicinity. Our submission on the section 32 report included land contamination, and particulate matter

(pm 10) from earthworks, as potential sources of adverse health effects.

Our submission on those issues does not imply we have no interest in other adverse health effects should the proposed Plan Change 51: Growth Precinct 4 and New District Plan Structure go ahead. It simply means we have chosen at this hearing to only address those specific topics. This approach should not be inferred as agreement or support for the matters we have not submitted on.

This proposed plan change also provides the opportunity to promote and improve public health through a connected green spine to support physical activity and active transport, and the creation of new and retention of existing parks and greenspace in the proposed precinct 4 area.

MidCentral Public Health Service participated in a pre-hearing meeting. From discussions in that pre-hearing meeting and a review of the officer's recommendation on our submissions, we wish to make the following submission to the commissioners:

Submission no. 62 SO17/001. We support the addition of measures to mitigate off site exposure to dust that contains particulate matter caused by earthworks. Although we recommended the inclusion of the condition for managing off-site effects of dust from the Ministry of the Environments 'Good Practice for

Assessing and Managing Dust’, we accept the Officers comment that District Plan Rule 3D.4.2B provides for dust control measures to be installed prior to construction works. Such measures should limit off-site dust exposure to neighbouring residents.

For our submission No.101 SO17/002, we have not received sufficient evidence to withdraw our opposition.

We do not consider that the initial site investigation report, or the additional testing completed for the landowner of lot 146 DP3479, 54 Roots Street, Feilding, is sufficient to meet the requirements of section 8(4) or section 9(3) of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.

Until the requirements of section 8 (4) or if that is not met, section 9(3) of those regulations are met, changing of land use or subdivision should be a controlled activity for site TP2, Lot 146 DP3479, 54 Roots Street, Feilding.

I’ll refer to that site as ‘Lot 146’ for the remainder of this submission.

We accept Opus’s additional site sampling report’s conclusion that additional sampling and testing of Lot

146 found the concentration of arsenic within the soils meets the soil guideline values for residential end use.

The initial detailed site investigation report noted that cadmium and arsenic were found at levels above the soil contaminant for health for residential land use at site TP2 Lot 146.

One of the recommendations of the detailed site investigation report for site LP2 lot 146 was:

‘For any development to be considered, on-site remedial options should be considered to remove contaminated materials and provide appropriate conditions for development.’

Opus confirmed that cadmium was not tested for in that additional testing of the site.

We were advised by Opus that the test methodology and results for arsenic from that additional testing could not be used to confirm that cadmium levels would also meet soil contamination for health guidelines for residential end use.

Unless additional testing is conducted at the site that confirms cadmium is at levels below soil contamination for health guidelines, we maintain the opposition noted in our submission. We consider that the requirements of section 8 (4) and 9(3) of the Resource Management (National Environmental Standard for

Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 have not been met.

Any change in land use or subdivision would be a controlled activity until either additional testing confirms that cadmium levels meet the soil guideline values for residential end use or that remediation measures have lowered cadmium levels to acceptable levels for residential use for site TP2, Lot 146.

Without additional testing, and remediation measures being applied if required, we consider that future residents at the TP2 Lot 146 site could be exposed to cadmium at levels that could cause adverse health effects.

Following our prehearing meeting, we are satisfied that Lot 146 is the only known potentially contaminated site in the proposed Precinct 4 area.

In regards to submission No.34 so17/003, we accept the Officer's explanation that private land ownership is a practical impediment to connecting the proposed recreational reserve ending at the end of Port Street East, to the Central Business District. We support the Officer's comment that the Manawatu District Council intends to extend walkways where landowner agreement allows.

Midcentral Public Health Service accept and support the retention of Rimu Park by amending the structure zone to show Rimu Park as recreationally zoned as per the Officer comment on MidCentral Public Health Service's submission No.92 so17/004.

That completes our oral submission thank you for the opportunity to speak to our submission.

Andrew Watt

20 August 2019

