

08 June 2009

Proposed Regional Policy Statement
Greater Wellington
PO Box 11646
Manners Street
Wellington 6142

Proposed Regional Policy Statement Greater Wellington Regional Council

Thank you for the opportunity to provide a submission on the **proposed Regional Policy Statement**.

Regional Public Health is a regional service located within the Hutt Valley District Health Board. Our geographical area of service delivery spans Hutt Valley DHB, Capital & Coast DHB and Wairarapa DHB. Regional Public Health is the third largest public health service in New Zealand in terms of population and geographic coverage. Regional Public Health delivers a range of population and personal health services, aiming to improve the health of communities throughout the greater Wellington region.

Regional Public Health would like the opportunity to provide an **oral submission** and we will be pleased to provide further information or clarification on any of the points raised in this submission. The contact point is:

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Regional Public Health Recommendations

Section	Recommended changes
Policy 1 (pg 80)	
Policy 1	Amend policy title to read: reverse sensitivity associated with odour, smoke, dust and other contaminants – district plans
Policy 1a	Amend to include other contaminants (e.g. fine particulate matter)
Policy 1b	Amend to include other contaminants (e.g. fine particulate matter)
Policy 1 - Explanation	Amend to include other contaminants that may adversely affect the health of people
	Amend to include activities which emit or cause other contaminants that may adversely affect the health of people (e.g. fine particulate matter) – such as roads with high traffic use
Policy 11 (pg 86)	
Policy 11 – Explanation	Include food gathering as an example rather than trout fishery
Monitoring and the AER (pg 146)	
Objective 1	Amend to include other contaminants
Objective 1a	Amend to include other contaminants that may adversely affect the health of people
Objective 1b	Amend to include other contaminants that may adversely affect the health of people
Appendix Three Definitions (pg 175)	
Sensitive activities	Include schools in this definition

Specific comments

Our recommended changes to the proposed Regional Policy Statement (RPS) are inserted within the current proposed policy and are in bold and italics.

Policy 1: Reverse sensitivity associated with odour, smoke, dust ***and other contaminants*** – district plans

(a) new sensitive activities locating near land uses or activities that emit odour, smoke, dust ***or other contaminants (e.g. fine particulate matter)***, which can affect the health of people and lower the amenity values of the surrounding area

(b) new land uses or activities that emit odour, smoke, dust ***or other contaminants (e.g. fine particulate matter)***, which can affect the health of people and lower amenity values of the surrounding areas, locating near sensitive activities.

Explanation

New sensitive activities should not establish near land uses or activities that generate odour, smoke, dust ***or other contaminants that may adversely affect the health of people***. The reverse is also true; new land uses and activities should be distanced from sensitive activities.

Land uses or activities that may affect sensitive activities include:

- activities which emit or cause odour – such as rendering, spray painting and solvent use, landfills, sewage treatment plants, silage feeding and effluent spreading.
- activities which emit or cause smoke such as backyard burning.
- activities which emit or cause dust – such as earthworks, quarries, and vegetation disturbance.
- ***activities which emit or cause other contaminants that may adversely affect the health of people (e.g. fine particulate matter) – such as roads with high traffic use.***

Rationale

District Plans should include policies and/or rules that discourage land uses or activities that produce discharges of other contaminants to air, for example, fine particulate in the close proximity of sensitive activities.

For example, locating an early childhood centre next to a busy road or intersection where vehicles produce significant amounts of fine particulate and other potentially hazardous contaminants could adversely affect the health of children at the centre.

Policy 11: Maintaining and enhancing aquatic ecosystem health in water bodies – regional plans

Explanation

Some water bodies may be managed for other purposes – such as ***food gathering***, contact recreation, water supply, groundwater protection or cultural purposes.

Rationale

The use of the term food gathering is more consistent with the wording used in Policy 5: maintaining and enhancing coastal water quality for aquatic ecosystem health – regional plans and in Policy 48: avoiding adverse effects on matters of significance to tangata whenua – consideration.

Monitoring and the AER – page 146

Objective 1 – Discharges of odour, smoke, dust **or other contaminants** to air do not affect amenity values and people's wellbeing.

Anticipated environmental results – District plans include policies and/or rules that discourage:

- (a) new sensitive activities from locating near land uses or activities that emit odour, smoke, dust **or other contaminants that adversely affect the health of people.**
- (b) New land use activities that emit odour, smoke, dust **or other contaminants that adversely affect the health of people** from locating near sensitive activities.

Appendix Three: Definitions – page 175

Definition of sensitive activities – **include schools in this definition.**

Summary

Thank you for the opportunity to provide feedback on the **Proposed Regional Policy Statement**. Wherever possible we have endeavoured to clearly articulate the linkage to health and wellbeing. However if there are parts of this submission where this is not clear or where the Regional Council would like more information we would be pleased to provide additional information and clarification.

RPH would like to be heard in support of this submission.

Yours Sincerely,



Dr Stephen Palmer
Regional Leader
Regional Public Health



Peter Gush
Service Manager
Regional Public Health