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**SUBMISSION ON AN APPLICATION FOR RESOURCE CONSENT UNDER THE  
RESOURCE MANAGEMENT ACT 1991  
Discharge Permit for the Stormwater Network for Invercargill City**

**To:** Environment Southland  
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**Details of Submitter:** The Southern District Health Board

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Southern District Health Board  
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**Consent Reference:** 16Oct03

**Name of Applicant:** Invercargill City Council

**Date:** 18/10/2016

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**SUBMISSION ON AN APPLICATION FOR RESOURCE CONSENT UNDER SECTION 88  
OF THE RESOURCE MANAGEMENT ACT 1991 – Discharge Permit for the Stormwater  
Network for Invercargill City**

1. This submission is presented by Southern District Health Board (Southern DHB). Through its public health service "Public Health South (PHS)" delivers public health services to 306,500 people who live in Otago and Southland. Public health services are offered to populations rather than individuals and are considered a "public good". They fall into two broad categories – health protection and health promotion. They aim to create or advocate for healthy social, physical and cultural environments and are often "invisible" until there is a problem. Positive outcomes are realised in the long term.

Public Health South is presenting this submission from the point of view of our values statement on water.

- a) Public Health South believes the health and wellbeing of current and future generations of Southerners should always take priority in water management decisions, particularly where there are competing interests for water use.
- b) Public Health South, as part of the Southern District Health Board (SDHB), has responsibility under the New Zealand Public Health and Disability Act 2000 to

improve, promote and protect the health of people and communities. Additionally there is a responsibility to promote the reduction of adverse social and environmental effects on the health of people and communities.

- c) Consequently Public Health South will work collaboratively with local government and iwi in all measures to protect the quality of water in the district.
  - d) Public Health South believes that all efforts to protect and restore water quality should be supported by the most comprehensive and current scientific evidence. Where evidence is lacking, the principle of “prudent avoidance” will be used.
  - e) Public Health South acknowledges that water is of major importance for Otago and Southland’s economic development. However, while economic wellbeing is necessary for good health, social, recreational, cultural and environmental assets such as drinking water quality, are also fundamental to health. A sustainable and thriving ecosystem is vital to supporting and sustaining the health of present and future generations in Otago and Southland.
2. This submission relates to the proposed application from the Invercargill City Council to replace five existing discharge permits with a single discharge permit. This would authorise the discharge of water and contaminants to surface water from the Invercargill City Council’s reticulated water network, in accordance with Rule 2 of the Southland Regional Water Plan. The receiving surface water bodies include the Waikiwi Stream, Waihopai River, Otepuni Stream, Kingswell Creek and Clifton Channel.
  3. Public Health South on behalf of the Southern DHB neither supports nor opposes this application by the Invercargill City Council, being concerned only with the adequacy of conditions to protect public health should consent be granted.
  4. Southern DHB recognises that Invercargill’s stormwater system is a vital network that protects the population from flooding events and the associated risk to public health. We acknowledge the historical burden of the deteriorating infrastructure (i.e. aging sewerage pipes and overflows), resource constraints related to stormwater treatment options and the continuing efforts of the ICC to upgrade the stormwater infrastructure. Discharge of contaminants in stormwater to surface water bodies in Invercargill is an issue - particularly in relation to the public health risks associated with its inadvertent contamination with sewage.
  5. In the event that consent is granted, Public Health South propose the following conditions should be applied:
    - A recreational survey of the receiving waters is completed to assess the risk posed to the public and more adequately address Objective A1(b) of the NPS-FM (2014), that is “to safeguard the health of people and communities, at least by secondary contact with fresh water; in sustainably managing the use and development of land, and of discharges of contaminants”.<sup>1</sup>
    - Increased communication and transparency with the public regarding the health risk posed from stormwater discharge contaminants in areas accessible to the public (i.e. signage that is aligned with Environment Southland communication strategies).

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<sup>1</sup> Ministry for the Environment. (2014). National Policy Statement for Freshwater Management 2014. Retrieved October 17 2016 from <http://www.mfe.govt.nz/sites/default/files/media/Fresh%20water/nps-freshwater-management-jul-14.pdf>

- Community education programmes that ensure the public are regularly updated as to the fate of stormwater entering local surface waters and how to better manage discharges to stormwater.
6. This submitter is not a trade competitor of the applicant for the purposes of section 308 of the Act.
  7. This submitter does wish to be heard in support of this submission but is not prepared to appear jointly with any other party making a similar submission. The submitter is willing to consider participation in any pre-hearing conferences, or mediation.

Dated at Invercargill: 18 October 2016



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