



1 May 2017

Wastewater Bylaw Review
Porirua City Council
P.O.Box 50218
Porirua 5240

Dear Sir/Madam

Re: Submission on Wastewater Bylaw Review

Thank you for the opportunity to provide a written submission on this consultation document.

Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Capital & Coast, Hutt Valley and Wairarapa and is based at the Hutt Valley District Health Board.

We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts. The Ministry of Health requires us to reduce potential health risks by ensuring that public health risks associated with resource management activities and infrastructure are considered.

We are happy to provide further advice or clarification on any of the points raised in our written submission. The contact point for this submission is:

Campbell Gillam

Health Protection Officer

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Tel: 06 3779134

Kind Regards

Dr Jill McKenzie
Medical Officer of Health

Peter Gush
Service Manager

Regional Public Health supports option 2 to retain the current by-law with the proposed amendments, including the intent to simplify the bylaw language.

We wish to make the following specific comments and recommendations.

1. Regional Public Health notes the reference to Section 54 of the Health Act 1956 in section 18.4, referring to the requirements for undertaking offensive trades. The written consent for undertaking removal and disposal of sludge is required from both the local authority and the Medical Officer of Health. This refers to the operators of desludging companies rather than individual on-site wastewater system owners.

Regional Public Health recommends some minor changes to this section to improve clarity as follows: **“Section 54 of the Health Act 1956 requires every operator of a business who removes and disposes of sludge from on-site sewage systems to have the written consent of The Council and of the Medical Officer of Health.”**

2. Regional Public Health is aware of on-site wastewater systems in the greater Wellington region that are failing with suspected associated contamination of ground and surface water sources.

Regional Public Health is strongly of the view that where an existing sewer connection is available they must be utilised.

Whilst this requirement is stipulated in Clause G13.3.3 of the Building Code, Regional Public Health believes that it would be useful to have this requirement specified in the proposed Bylaw.

Regional Public Health therefore recommends that a new section 18.6 be inserted which states: **“Where a sewer connection is available the drainage system shall be connected to the sewer.”**

3. Regional Public Health supports the provisions of sections 19 and 20 of the current and proposed Bylaw and believes the provisions for inspections of on-site wastewater systems allows for ongoing compliance especially for failing or ageing systems and in areas where water quality monitoring indicates potential contamination concerns.

Regional Public Health recommends: **That sections 19 and 20 of the proposed Bylaw are retained.**

Thank you for the opportunity to comment on this Bylaw review.