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**Submission on application concerning resource consent that is subject to public notification by consent authority**

This is a submission on an application from Property Seven Limited to Western Bay of Plenty District Council. Application number: RC111545. The proposal is to create a non-complying protection lot subdivision of 137 lots within the rural zone located at 259, 295 & 307 Pukehina Beach Road, Pukehina.

The Bay of Plenty District Health Board (Bay of Plenty DHB) is required by the Public Health and Disability Act 2000 to improve, promote, and protect the health of people and communities, to promote the inclusion and participation in society and independence of people with disabilities and to reduce health disparities by improving health outcomes for Māori and other population groups.

This submission has been prepared by Toi Te Ora Public Health (Toi Te Ora) which is the Public Health Unit for Bay of Plenty DHB. The key role of Toi Te Ora is to promote, protect and improve population health, prevent ill health and minimise the risk of disease and injury through population based interventions.

Public health approaches wellbeing and health in terms of the social, economic, cultural, environmental and political context and from a “determinants of health” perspective. Many of the crucial underlying factors that contribute to population health and wellbeing are directly influenced by the decisions and activities of consenting authorities.

Designated officers within Toi Te Ora have responsibilities to reduce conditions within the local community which are likely to cause disease. In part this is undertaken by assisting Councils with their responsibilities pursuant to the Resource Management Act.

For these reasons, Bay of Plenty DHB makes this submission and welcomes the opportunity to provide helpful, objective and independent input to inform resource consent decisions for the health of people living in Western Bay of Plenty.

Bay of Plenty DHB could not gain an advantage in trade competition through this submission.

Bay of Plenty DHB has no preference whether Council delegate their functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.



This submission relates to the entire application and Bay of Plenty DHB opposes the application as notified. Our reasons for opposition are that the land is low-lying, prone to flooding, earthquake liquefaction and tsunami inundation and, is located in an area not planned for urban growth and moreover the provisions of sanitary services appear inadequate.

The reasons for our objection are explained further below including the decisions Bay of Plenty DHB seek should the application be granted.

**1. The public health sector seeks to minimise the health risks to communities and individuals from emergency events and protecting public health is an important component of community resilience.**

The impacts of emergency events are often devastating. People may lose family and friends, become homeless. Therefore, built environment planning should increase resilience to emergency events, not increase the collective and individual risk of harm. One way to increase resilience is to consider very carefully, and avoid if necessary building new communities in areas which are prone to flooding or other natural hazards.

Local authorities play a significant role in building strong and safe communities across all of the work they do. This all contributes to increasing resilience and reducing the impact of events when they occur. For these reasons we do not support the proposal to create 137 homes located within an area of potential widespread liquefaction, within a flood hazard area (extreme rainfall with a 50 year average), and within a tsunami zone.

Decisions sought: that Council takes into consideration

- The natural hazard provisions of the Regional Policy Statement for future development not to increase risk
- Their local authority responsibilities within the Bay of Plenty Civil Defence Emergency Management Group Plan, to reduce the collective and individual risk through building social, economic, environmental and cultural resilience
- That the natural hazards are clearly understood by first and subsequent home owners and occupants.

**2. The applicant proposes to service the 137 dwellings by individual onsite effluent treatment systems.**

Human faeces must be regarded as containing human pathogens which are capable of causing illness/disease eg. Campylobacter, Salmonella, Giardia and Norovirus. Many of these are still infectious, even when sewage has been in the external environment for some time.

Consequently, it is necessary to dispose of sewage in such a way that public health is protected. Effective sewage disposal will separate people from waste, keep pathogens out of the environment and prevent contamination of food and water sources.

Onsite sewage systems put people at risk of harm because they are known to fail due to inadequate maintenance and, many individual systems results in multiple separate discharge locations, and many people will reside in the vicinity of their own and other people's waste.

Protecting human health is the primary purpose for treating and disposing sewage. Professionally designed, maintained and operated centralized sewerage systems are the most protective of health for individuals and communities.



Council needs to consider whether 137 individual onsite systems is the acceptable sanitary service solution for this situation. From our perspective, onsite systems are acceptable only:

- a) when a connection to/or the establishment of a reticulated sewerage system is not an option now or in the long term, and
- b) in 'remote' and isolated dwellings and
- c) provided they are properly maintained and operated.

Bay of Plenty DHB considers that onsite systems are not suitable for growing communities and this development should be serviced from the outset with appropriate wastewater disposal.

This subdivision should not be approved until there is a suitable sanitary system is proposed such as a centralized reticulated wastewater scheme in place.

Decision sought: should this consent be granted, that a condition of consent requires a professionally designed, maintained and operated centralized sewerage system be in place before dwellings are built.

### **3. The applicant proposes to use captured rainwater from the roof for irrigation and possible potable tasks.**

Sustainable and waste minimisation practices are supported by Bay of Plenty DHB provided these practices do not increase the risk to public health. However, there is little detail in the documentation at this stage. Since the residences are intended to have connection to Council supplied potable water we see only risk in the use of rainwater inside the building..

Bay of Plenty DHB support the use of quality assured council supplied water. Roof collected (and other water sources) must be kept separate from Council's water supply and used outside by people with an understanding of how to use it safely.

Decision sought: that the consent authority clarify what water will be reused/recycled and should this consent be granted, that conditions of consent require:

- All dwellings to connect to Council's community water supply
- Only potable water ie. meets the drinking-water provisions of the Health Act, is used inside a dwelling or a building
- Non-potable water sources are kept separate from potable sources at all times.
- Village owners and occupants (initial and future) are informed of the safe uses for non-potable water

### **4. Low-lying and slow moving water environments can favour pests and vermin which can carry disease.**

With the proposal to create a large wetland or swamp/marsh environment next to a housing community, it is envisaged that pests and vermin may become a nuisance to public health. The application does not appear to address how pests and vermin will be controlled to prevent this situation from arising.

Decision sought: that Council seeks further information how pests and vermin will be controlled on an ongoing basis.



Toi Te Ora on behalf of Bay of Plenty DHB wishes to be heard in support of this submission. Dr Jim Miller, Medical Officer of Health is willing to meet to discuss the points raised in this submission.

Bay of Plenty DHB would not consider presenting a joint case with others who make a similar submission.

*Sally Webb.*

**SALLY WEBB**  
**Board Chair**

**Address for service**

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