



02 February 2015

The Environmental Regulation Department
Greater Wellington Regional Council
PO Box 41
Masterton 5840

Dear Sir/Madam

**Re: Resource Management Act 1991
Submission on South Wairarapa District Council Discharge Consent to discharge
contaminants to land air and water associated with the proposed long term upgrade and
operation of the Greytown Wastewater treatment plant.
WGN/WAR 26633, 33180, 33181, & 33182**

Submitter: Dr Jill McKenzie, Medical Officer of Health on behalf of Regional Public Health
Contact Details: Regional Public Health
Hutt Valley District Health Board
Private Bag 31-907
Lower Hutt
Telephone: (04) 5709002 Fax: (04) 570 9211

Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Wairarapa, Hutt Valley and Capital & Coast 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 include a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

Reasons for submitting

The reason for this submission is to ensure that the public health risks associated with the proposed activity are considered. The Ministry of Health requires us to reduce potential health risks by various means, which includes making submissions on resource consent matters. The submitter is **neutral** and neither supports or opposes the application.

Regional Public Health could not gain an advantage in trade competition through this submission.

Regional Public Health **supports** the South Wairarapa District Council's policy of progressively reducing discharges into water ways in a sustainable and affordable way. Regional Public Health recognises that poor recreational water quality is one of the key environmental factors contributing to poor human health status, and disparities in health outcomes in the Wairarapa.

In terms of fully assessing the environmental effects of the discharges, it is important to consider 'health' as being broader than merely the physical effects on people. In particular, effects on Maori health include physical, mental, whanau, and spiritual wellbeing (as described by Professor Mason Durie in *Whaiora: Maori Health Development*, 1998). Regional Public Health recognises non-physical impacts on health as valid and requiring consideration in terms of the Resource Management Act 1991. Although it is possible to reduce the potential physical health risks from microbes in direct wastewater discharges to waterways e.g. via use of warning signage, this does not necessarily apply to effects on the other aspects of health. The discharge of human effluent to waterways is of significance to iwi and can reasonably be expected to have more than just physical implications for iwi health. Regional Public Health notes that iwi are being consulted on this proposal.

Regional Public Health **supports** the concept of Integrated Catchment Management and recognises that the Greytown Wastewater Treatment Plant should be considered an integral part of the wider Wairarapa Valley catchment and that the wastewater treatment plant discharge represents a point source discharge.

Regional Public Health **supports** the proposed consent condition 20 (Schedule 1 General Conditions) regarding warning signage and proposed condition 21 regarding consultation with Regional Public Health on the appropriate wording for the signage.

Regional Public Health does not oppose the proposed timeframe of the land stage commissioning programme provided that they are set as conditions of any consent granted. We believe however that health risk associated with the discharge of treated effluent to the Ruamahanga River should be reduced as soon as practicable and thus the timeframes proposed should be seen as a maximum.

It is noted that discharge to land will take place subject to the provisions of the Wairarapa Combined District Plan Rule 4.5.2(m)(ii)(a) *Disposal of wastewater from a municipal wastewater treatment plant* which provides a setback distance of 25m from the property boundary for spray irrigation of treated wastewater with *E coli* concentrations with a median less than 100cfu/100ml, provided application methods and parameters comply with the provisions of the Combined District Plan. Regional Public Health is satisfied that this setback distance is appropriate and is likely to ensure that aerosols (including associated odour) do not cross boundaries to adjoining properties.

It is proposed that discharge to land at stage 2A (Bicknell Farm) is due to commence in 2035 and that this timeframe represents the maximum anticipated time period to implementation. Regional Public Health **recommends** that in formulating a consent condition requiring discharge to land under stage 2A, that consideration is given in the consent wording to reflect that disposal technologies and treated wastewater demand may alter over the ensuing sixteen years. It would be anticipated that

discharge to land would be as per best practice operational procedures at time of commencement of activity. It is further **recommended** that provision for a structured review process be incorporated into consent conditions to regularly track and monitor progress towards the implementation of the staged upgrades.

Resolution

The decision sought in the event that the application is granted is the imposition of adequate conditions to protect the health of people and communities including that:

- Public warning signage shall continue to be in place in the vicinity of the plants discharge to the confluence of the Papawai Stream and Ruamahanga River.
- That a consent condition requiring installation of a UV filter during stage 1A be imposed.
- Public warning signage shall be erected around areas of disposal of treated effluent to land.
- That disposal to land methods ensures that aerosols (including associated odour) do not cross boundaries to adjoining properties thus meeting the Wairarapa Combined District Plan provisions.
- Consideration be given to incorporating monitoring of implementation of the staged upgrades and alignment with reassessment of current best practice and wastewater treatment demand.

We **do** wish to be heard in support of our submission.

We have served a copy of this submission on the applicant. 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
Heath Protection Officer
Regional Public Health Wairarapa
PO Box 96, Masterton
06 377 9134, 027 2415906
Campbell.Gillam@wairarapa.dhb.org.nz

Kind regards

Dr Jill McKenzie
Medical Officer of Health

Peter Gush
Service Manager