

18 February 2021

Porirua City Council
PO Box 50218
Porirua City 5240

Tēnā koe

Re: Submission on Proposed Stormwater Bylaw

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 as a service is part of 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.

Please find Regional Public Health's submission as per the template provided by Porirua City Council below.

1. Do you agree with the preferred option of combining Part 24 Silt & Sediment and Part 26 Stormwater to create a new Bylaw called the Stormwater (Pollution Prevention) Bylaw 2021?

Yes.

Regional Public Health supports the combination of Part 24 Silt and Sediment and Part 26 Stormwater of the Porirua City Council General Bylaw 1991 to create the Stormwater (Pollution Prevention) Bylaw 2021.

The proposed Bylaw appropriately updates the existing Part 24 and Part 26 to facilitate management and control of contaminant discharge in alignment with local, regional and national policies and standards. Having it as a separate bylaw will make it easier to adapt and update in the future.

Regional Public Health recommend that Porirua City Council consider specifying within the purpose of the proposed Stormwater (Pollution Prevention) Bylaw 2021 that it will support the Council to meet the requirements of the RMA and specifically the Global Stormwater Consent. This includes meeting water quality targets via providing the mechanisms to take remedial actions on impacts from the privately owned stormwater system. The Global Stormwater Consent also contains the monitoring framework by which the effectiveness of this bylaw can be assessed.

Regional Public Health recommend that Porirua City Council consider altering paragraph 6.6 in the proposed Stormwater (Pollution Prevention) Bylaw 2021 so that stormwater detention and hydraulic neutrality be a compulsory conditional requirement for all new houses, buildings or redevelopments as per 4.2.1 of the regional standard for water services rather than “may” be a conditional requirement. This suggested wording emphasises the importance of reducing the impact of stormwater discharges.

2. Do you agree with Option 2 - continue with the status quo and have separate bylaws for Silt and Sediment and Stormwater?

No.

Regional Public Health’s preferred option is option one for the reasons given above.

3. Do you agree with Option 3 - combine all three waters under one bylaw e.g. Water Supply, Wastewater and Stormwater Bylaw?

No.

Regional Public Health’s preferred option is option one as per the reasons given. We agree that combining the three water bylaws would be challenging. However, given the interconnectedness of stormwater, wastewater and drinking water infrastructure, it will be important to cross reference the relevant bylaws in the proposed Stormwater (Pollution Prevention) Bylaw 2021. As previously noted, the current Global Stormwater Consent contains a monitoring framework, which aligns well with reviewing the effectiveness of a specific stormwater bylaw. For example, the requirement in clause 6.7 to have connections to the drainage system inspected, can identify any accidental or illegal cross connections in new or changed building use, reducing the opportunity for contamination from private laterals to impact on discharges from the public stormwater network.

We are happy to provide further advice or clarification on any of the points raised in our written submission. We do not wish to be heard on this topic. The contact point for this submission is:

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Ngā mihi

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