



# TOI TE ORA PUBLIC HEALTH

Bay of Plenty + Lakes Districts

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Toi Te Ora Public Health  
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5 July 2022

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## **Hearing relating to Submissions on Plan Change 93 – Te Puna Springs to the District Plan**

Toi Te Ora Public Health (Toi Te Ora) submitted to private plan change request from Te Puna Springs Estate Limited to Western Bay of Plenty District Council. Please table this letter at the hearing.

Toi Te Ora opposed the application as notified. The reasons for our opposition were:

- there is inadequate detail within the plan change request regarding proposed wastewater provisions, ie how wastewater water will be 'safely' managed.
- the existing provision of sanitary services ie; onsite wastewater systems, in Te Puna have proven to be inadequate, and
- if this plan change request is approved with a similar approach to the present wastewater arrangements ie onsite wastewater systems, 'nuisances' under the Health Act 1956 will continue to occur.

I note the wastewater recommendation to add the following text to Appendix 7, section 8 in the Senior Consents Planner's report dated 7 June 2022 titled 'Planner's Report for Plan Change 93 – Te Puna Springs'.

*"All development shall be connected to a Council reticulated system and a volumetric capital connection fee will be charged for each new connection to councils reticulation at the time of building consent. Disposal of wastewater to an OSET system within the structure plan area is not permitted."*

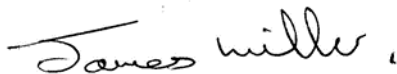
The applicant has communicated to Toi Te Ora and Council's Senior Consents Planner their agreement for this text to be included. However, this text does not go far enough to address the submission points raised in our submission. Consequently, Toi Te Ora remains in opposition to this application.

Although it would appear that the applicant and council are of like minds that onsite wastewater disposal is unlikely, the recommended text above enables the disposal of wastewater to an OSET

system as a discretionary activity within the structure plan, which is not an outcome that would be protective of the public's health.

To manage wastewater safely in an urban environment and satisfy the concerns raised in Toi Te Ora's submission, the disposal of wastewater to an OSET system within the structure plan needs to be prevented. A non-complying or prohibited activity status in the structure plan rules will protect public health. This will provide the assurance I need that a similar approach to the present wastewater arrangements will not happen and lead to further 'nuisances' under the Health Act 1956.

I wish to state our support for Bay of Plenty Regional Council's position in their submission and statement of evidence by Nathan Te Pairi – Planning 1 July 2022. It is widely accepted that urban stormwater needs to be managed well to protect human health by preventing contamination of the environment and reducing the risk of flooding. I therefore support the need for a stormwater system that can accommodate an appropriate stormwater management solution within the footprint identified on the Structure Plan.

A handwritten signature in black ink that reads "James Miller". The signature is written in a cursive, flowing style.

Dr Jim Miller  
**Medical Officer of Health**