

SUBMISSION ON AN APPLICATION FOR RESOURCE CONSENT UNDER SECTION 95A OF THE RESOURCE MANAGEMENT ACT 1991

To: Otago Regional Council

Submitter's name: Public Health South on behalf of Southern District Health Board.

1. This is a submission on the application RM20.164.01 - to discharge up to 1,800,000 litres per day of treated municipal wastewater to land from Kingston Township. Location is at Kingston, approximately 1 kilometre southwest of the intersection of Kingston Garston Highway (State Highway 6) and Kent Street at about NZTM 1263429E 4970206N (centre point discharge field 1) and NZTM 1264112E 4969779N (centre point discharge field 2).
2. Southern District Health Board (Southern DHB) presents this submission through its public health service, Public Health South (PHS). Southern DHB delivers health services to a population of 353,100 and has responsibility under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956 to improve, promote and protect the health of people and communities. It seeks to promote equity and to reduce adverse social and environmental effects on the wellbeing of people and communities. These statutory obligations are the responsibility of the Ministry of Health and in the Otago district the obligations are carried out under contract by Public Health South (under Crown funding agreements, on behalf of the Southern District Health Board). The Ministry of Health requires this submitter to reduce potential health risks by means including submissions on resource consents to ensure the public health significance of potential adverse effects are adequately considered by consent authorities.
3. PHS appreciates the opportunity to submit on this application and is in general in support of this application as received, with conditions. We believe that the application has the potential to improve the health of the Kingston population, provided that certain matters are addressed.
4. The specific provisions or parts of the application that this submission relates to are those parts that address the topics of:
 - a) The existing township on-site wastewater systems (not to be connected to reticulation).
 - b) The adequacy of the proposed monitoring conditions.
5. In particular, our concerns relate to a lack of information with the application and further monitoring conditions that would otherwise provide further assurance that the proposal will protect the health of the population in the future (or provide early indications that further corrective factors need to be applied). Specifically, these include:
 - a) What is intended for those on-site wastewater systems closer to the lake that have not been included in the proposal, to connect to the new treatment plant and disposal facility.
 - b) Should this application for consent be successful, monitoring conditions should include further detail and in particular a need to include lakeside water quality. This is to determine the effect on ground/lake water quality pre and post inception of the wastewater system over time, and in the event that the township expands further.
6. The decision sought is that should this application be successful, further detail is provided by way of monitoring conditions that are suitable to Public Health South that are adequate and no less stringent than that required to protect Public Health. Further information needs to be provided to determine the fate of the remaining on-site wastewater systems not connected to the new reticulated wastewater system.

Summary

6. This submitter is in support of this application with conditions that concern:
- (i) the provision of further information on the remaining unreticulated sections in Kingston that are not part of the plan, and;
 - (ii) monitoring conditions that include lake monitoring at Kingston.

Finally, we believe that overall, a reticulated wastewater system for Kingston will improve and protect the health of the community.

7. This submitter is not a trade competitor of the Applicant for the purposes of s.308B of the Act.
8. This submitter will wish to be heard in support of this submission but will not be prepared to consider presenting a joint case with others. The submitter is willing to consider participation in pre-hearing conferences, or mediation.

Dated at Dunedin this 24th day of September 2021



Andrew Shand
Health Protection Officer
For and on behalf of Public Health South, Southern District Health Board
Attention: Andrew Shand
Email: Andrew.shand@southerndhb.govt.nz
DDI: 03 4769895