



**COPY OF ORAL SUBMISSION OF CAMPBELL GILLAM ON BEHALF OF  
REGIONAL PUBLIC HEALTH, AND THE MEDICAL OFFICER OF HEALTH  
SUBMITTER 136 TO Greater Wellington Proposed Natural Resources Plan  
Hearing Commissioners Panel Hearing Stream Three  
Date: 12 September 2017**

1. My name is Campbell Gillam. I am employed as a health protection officer by Regional Public Health, a unit of the Hutt Valley District Health Board. I hold a Bachelor of Health Science from Massey University, and a Post Graduate Diploma in Public Health from the University of Otago. I have been employed by the Wairarapa District Health Board since March 2008 and subsequently by Hutt Valley District Health Board since 2013.
2. 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 Hospital. The reason for this submission is to ensure that the public health risks associated with the proposed plan are considered. The Ministry of Health requires us to reduce potential health risks by various means, which includes making submissions on resource management matters.
3. Thank you for the opportunity to talk to our written submission on the Proposed Natural Resources Plan and I note that the Hearing covers two broad topics: Water Allocation and Natural Form. We would like to focus on Water Allocation from our written submission.
4. **Rule 140 Dewatering permitted activity.** Regional Public Health originally submitted in support of the rule and whilst we support the intent of the rule we wish to suggest an amendment which we believe will assist to protect the Health of the public. We submit that the proposed rule be amended by the addition of a further clause (f)
- 5.



***“that the take is not located within a Groundwater community drinking water supply protection area shown on Map 27 a, Map 27b or Map 27c***

This would have the effect that in the event that an application was received for consent for an activity located within a drinking water supply protection area then it would be considered under the discretionary default rule R142 whereby any potential effects arising from the dewatering on the drinking water source can be further assessed.

Where dewatering pumping is carried out in an aquifer which is used as a source for a community drinking water supply there is a potential for negative impacts on both the quality and quantity of water resource from the aquifer. Dewatering pumping can have the potential to lower regional groundwater levels in the aquifer and reduce water available to the drinking water supply and has potential contamination effects. Regional Public Health believes that it is appropriate that any such possible effects are considered through a discretionary consent process.

Regional Public Health has recently been involved in a dewatering consent associated with roading construction potentially impacting on the Paekakariki Community Groundwater community drinking water Protection Zones and Bores and commented on assessment and management of potential effects. Our understanding is that the requirement to undertake further risk assessment around the dewatering activity in proximity to the drinking water supply aquifer was determined by the Board of Inquiry. Our recent involvement with this issue has prompted our additional oral submission on this matter.

## **5 Schedules Q**

With regard to Reasonable and efficient use criteria for Group and Community water supplies, Regional Public health supports the intent of Schedule Q. In the face of likely reducing flows due to climate change and competing uses (in some areas) it is appropriate that continuity of supply is supported by ensuring that all users including Community or group drinking water supplies are using water as efficiently as possible. In addition, areas with an increase in predicted heavy rainfall can also be impacted by the need to conserve water during periods where the quality is unsuitable for consumption. Regional Public Health supports the requirement for water management plans.

Regional Public Health is uncertain from the wording of Schedule Q for group and community water supplies, what the performance criteria are and how they will be applied and assessed and any consequences of not meeting the criteria. This level of detail around



how to meet these requirements may be provided in the form of a guideline that sits outside of the plan.

We also note that matters such as addressing effectiveness and efficiency of the distribution network may of necessity require more than four years.

6. Once again thank you for the opportunity to speak in more depth around these two topics and we welcome any questions or further discussion on our submission from the Commissioners.

