

**SUBMISSION: Water Supply and
Wastewater Network Bylaw 2015
13TH JULY 2021**

Business North Harbour Incorporated
Kevin O'Leary – General Manager
PO Box 303 126
North Harbour 0751
Phone 09 968 2222 or 0274 799 563
Email: kevin@businessnh.org.nz

13th July 2021

Auckland Council,
Water Supply and Wastewater Network Bylaw 2015
Freepost Authority 190197
Private Bag 92300
Victoria Street West
Auckland 1142

bylawfeedback@water.co.nz

Submission to the Water Supply and Wastewater Network Bylaw 2015.

Introduction

Business North Harbour (BNH) representing the North Harbour Business Improvement District welcomes the opportunity to make this Submission on the Water Supply and Wastewater Network Bylaw 2015.

BNH is a significant commercial and industrial Business Improvement District (BID), representing over 4,500 commercial property owners and businesses within the North Harbour area. Collectively they employ over 35,000 Auckland residents and ratepayers.

The organisation is located within the Upper Harbour Local Board area, which remains one of the fastest growing areas in the country, in both absolute and percentage population terms, which brings both challenges and opportunities to the North Harbour business district.

BNH represents and works with a wide range of businesses comprising of a mix of sole traders, Small Medium Enterprises (SME), through to multi-national organisations representing sectors such as ICT, business services, specialist manufacturing, light – medium warehousing, logistics, retail and hospitality. In addition, we have key educational institutions within or on our boundary, including Massey University Albany and AUT Millennium, along with a variety of primary and secondary schools including Rangitoto College, the largest secondary school in New Zealand.

Background

Every day, people obtain drinking water and discharge their wastewater through the public water supply and wastewater networks. Sometimes, the network can be damaged, contaminated or misused by people connecting to or disconnecting from the water supply and wastewater networks, work undertaken near the network, illegal connections or illegal discharges of waste into the network. This can result in local water shortages and health risks.

Auckland Council uses a Bylaw which is administered by Watercare Services Limited (Watercare) to help protect Auckland's public water supply and wastewater networks. A recent review identified where improvements could be made:

- clarify requirements for Watercare consents to connect to or disconnect from the public network and provide for exemptions from water use restrictions
- clarify the definition of waste which may not be discharged into the wastewater network, for example wipes, nappies and sanitary products

- further define rules related to unauthorised taking of water from the network and unauthorised discharges to the wastewater network.

Auckland Council is seeking feedback on a proposal to improve how we manage the Water Supply and Wastewater Network.

Business North Harbour Feedback

Proposal 1.

To further define the rules regarding unauthorised taking of water from the network.

We want to strengthen the rules around taking water from the Water Supply Network including from access points other than hydrants.

We are proposing to clarify the Bylaw wording, including that: it is an offence to take water from any part of the network.

What is your opinion on this proposal?

BNH agrees with this proposal. With water being such an important commodity which is often in short supply around Auckland, it is imperative that any illegal connections to the network are minimised, thus reducing the amount of water being 'stolen' and lost through leakage, given that many illegal connections would not necessarily follow good practice guidelines.

It is equally important that authorised connections and disconnections are carried out to the appropriate good practice guidelines and standards to avoid any possible leakages.

Furthermore, the restrictions on people tampering with the water supply and wastewater networks outlined in Clause 6 (d) we believe will also support a reduction in the unauthorised taking of water from the network.

Proposal 2.

To further define the rules regarding unauthorised discharges into the Wastewater Network.

We want to clarify the definition of waste which cannot be discharged into the wastewater network with examples of prohibited waste.

We are proposing to clarify the Bylaw wording, including to add examples of "prohibited waste" such as wipes, sanitary products, fats and grease.

What is your opinion on proposal 2?

BNH agrees with this proposal. To enable compliance people must fully understand what is and isn't allowed to be discharged into the wastewater network. Identifying the nine examples of prohibited waste in Clause 14 (4) along with defining the prohibited characteristics of such waste in Schedule 1, makes it easy to understand what items must not be discharged into the wastewater network.

BNH believes that this should significantly reduce the number of incidents of prohibited discharge due to people simply not understanding what is prohibited. The caveat to this would be how many Aucklanders would actually read the Bylaw?

BNH would suggest that an initiative to educate the general population regarding prohibited discharge into the wastewater system should be undertaken, to optimise the opportunity to reduce the amount of prohibited items entering the system. Watercare

should invest in this initiative in the short-term which would save money in the long-term, as prevention is better than cure.

Additionally, BNH agrees with Clause 15 (1) which prohibits anyone from discharging to the wastewater network except through an authorised connection or other Watercare approval.

Proposal 3.

Clarification of linkages to other documentation.

We want to provide clarification of linkages to other legislation, bylaws, and other documentation.

We are proposing to clarify the Bylaw wording, including to:

- ensure that it is easy to follow and aligned to linkages to other documentation
- provide clarification of the definition of 'standards' in relation to the vesting of assets, clarification of offences and statutory powers, and adding clarity to the definition of works that can occur in close proximity to the Water and Wastewater networks.

What is your opinion on Proposal 3?

BNH agrees with this proposal. Making the Bylaw clearer and easy to understand both as a stand-alone document and in conjunction with links to other documentation, should help to support the achievement of the purposes of the Bylaw whilst reducing the number of 'accidental' breaches due to lack of knowledge or understanding.

Setting standards and clarifying what works can be undertaken in close proximity to the networks should reduce the amount of water lost from the networks due to poor workmanship or the accidental damaging of pipes.

For the Bylaw to be successful there needs to be a system of enforcement which is supported by clearly defined offences, penalties and statutory powers. The information contained in Clauses 16 – 19 clearly sets out the information regarding all of the above and enables Watercare to enforce the Bylaw with consequences for any breaches, which will hopefully reduce the number of breaches, to the benefit all Aucklanders.

Conclusions

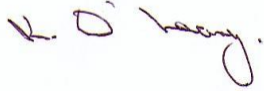
Businesses as well as homes rely upon the provision of safe and efficient water supply and wastewater services to enable them to operate efficiently whilst also maintaining a duty of care towards their employees and visitors. Given that the purposes of this Bylaw are to:

- (a) protect the public water supply and wastewater networks from damage, misuse and interference
- (b) assist in the provision of reliable, safe and efficient water supply and wastewater services in Auckland
- (c) protect the environment and the health of people using the water supply or wastewater network.

BNH supports the proposed changes as we believe that clearly defining what is and isn't allowed in relation to the water supply and wastewater networks and empowering the appropriate enforcement of the Bylaw, will support as far as is practically possible, the purposes of the Bylaw which are beneficial to all Aucklanders.

Should there be any questions or other matters arising from this Submission, we would be pleased to respond to those.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "K. O'Leary", written in a cursive style.

Kevin O'Leary
General Manager