

26 May 2020

South Wairarapa District Council
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Tēnā koe

RE: Feedback on the South Wairarapa District Council (SWDC) Annual Plan 2020-21

Thank you for the opportunity to comment on Council's proposed Annual Plan. This submission is on behalf of Regional Public Health (RPH). RPH serves the greater Wellington Region through its three district Health Boards Wairarapa, Hutt Valley and Capital and Coast.

We work with our communities to make the region a healthier safer place to live. We promote good health, prevent disease and improve the quality of live for our population, with a particular focus on children and Maori and work 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.

RPH respects and acknowledges that SWDC decisions have a significant impact on health. We see this through appropriate management of infrastructure in particular drinking water infrastructure.

RPH notes that Wellington Water's review of the Districts town water supplies has identified the need for extra barriers of protection to meet compliance with the drinking Water Standards and to ensure safe drinking water. RPH supports Council's assessment that such work is essential and agrees that it should be Councils main focus in the next year.

Water Resilience Action Plan

There is a move both regionally and nationally, including through the Proposed Greater Wellington Natural Resources Plan to mandate the efficient use of water, and water metering can be a useful strategy for conserving fresh water resources, raise consumer awareness and promote the value of water. RPH supports the proposal to develop a Water Conservation Action Plan and suggests that consumer education and positive reinforcement of key conservation measures may complement the existing provision of meters.

Reducing the current household water allowance per property

RPH is unaware of the average water consumption per South Wairarapa district urban residence but literature suggests that New Zealand uses a large amount of water when compared to people in other countries.

Some estimates for New Zealand household water usage is in the range of 230 litres per person per day. A BRANZ study undertaken before meters were installed in Kāpiti estimated the average use per person was in the vicinity of 184 litres per person per day, with summer usage up to 240 litres per person per day.

Council has set a current allowance of 350 cubic meters per year which is a generous allowance when compared to other metered communities and equates to 1000 litres per day. Council is seeking feedback on a proposal to reduce this current household water allowance to encourage high users to reduce their use or pay by unit over the threshold.

It is however entirely possible that a large household of four adults or adolescents for instance can use at least three quarters of the annual current allowance of 350 cubic meters with what could be considered normal household usage.

The point being that such households may not necessarily fall into the category of unreasonably high users.

A correctly sized affordable water allowance is important because the provision of potable water is a public health good as often lower income or larger households may change their water use to meet their household budget.

Such changes driven by water rate bills may have the unintended consequence of increased health risks for households, for instance reducing the frequency of linen washing that may have been recommended to a family to manage skin infections within the household. It is important that tariffs are set at a level which avoids household health impacts. Thus any reductions in current annual allowances requires careful consideration and should include potential impacts such as changes in practices that could affect health outcomes.

This may include more indirect impacts on well-being e.g. decisions not to maintain a family vegetable garden due to increased costs associated with water use.

In addition any consideration of a reduction in current allowance should include whether there is a disproportionate burden placed on an already disadvantaged group compared with an advantaged group e.g. the difference in burden between high and low income households-although the cost of water may increase only a small amount for low income households compared with higher income households.

Recommendation: If Council moves to reduce the current household water allowance RPH recommends that Council when setting any new tariff structure assesses whether or not there are likely to be any impacts on lower income households or other vulnerable groups.

Removing or revising the Water by Meter Write off Policy

Council is seeking feedback on the revising or removing of the current policy. One of the stated purposes of the policy is to recognise genuine and real hardship and Council should be congratulated on the adoption of such a policy.

It is likely that the greatest individual impact on household water usage and on resident's water bills, is likely to be the presence of leaks and the installation of meters should enable the identification of these and the charging regime should encourage the repair of these. However it should be recognised that some of these leaks will be major and potentially very expensive to repair.

The ability for repair of leaks by property owners may be itself problematic with repair of leaks less likely to be taken up by low income households which may potentially increase inequalities and place a relatively greater impact on low income versus higher income families.

In the event of the removal of the policy it may be that low income families may be faced with increasing water bills because of leaks but have a decreased ability to pay for repair of those leaks because of the increased water bill commitment which is a situation that helps no one.

Recommendation: RPH believes that it is necessary to retain the existing policy at least where genuine and real hardship exists

Offering subsidised water tanks and making it compulsory for new buildings to include their own water storage solutions.

The installation of tanks is being considered for reducing household demand for the public water supply through the use of urban rainwater harvesting.

RPH advises that there are known human health risks from consumption of roof collected rainwater supplies.

While RPH recommends using the public water supply where available, for potable water use, RPH does recognise that there is a growing acceptance amongst the public of using rainwater for non-potable uses (toilet, laundry and outdoor), providing suitable precautions are taken to ensure public health risks are appropriately managed such as:

- Clearly labelling non-potable water outlets as not suitable for drinking and any non-potable pipelines are an appropriate colour
- Provide backflow prevention to prevent the possibility of the non-potable water contaminating the potable water source
- Ensure systems are adequately maintained and operated.

Council has the responsibility to manage rainwater collection systems for non-potable use under the Building Act including the requirements for buildings to be supplied with potable water. It is likely that supporting systems would need to be developed to sit alongside any move to urban rainwater harvesting such as operating systems, design codes which link to the Building Act, educational

programmes and regular monitoring checks by Council. It is possible such supporting systems may be in the form of codes of practice or bylaws.

If Council further considers this matter RPH would welcome the opportunity to have further input.

We are happy to provide further advice or clarification on any of the points raised in our written submission. We do wish to speak to our submission. The contact point for this submission is:

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Nāku noa, nā

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