

Our file: 27-  
M-01

Your file:



By EMAIL

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**Community & Public  
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*"Promoting Healthy Choices and Environments in South Canterbury"*

12<sup>th</sup> November 2010

Mackenzie District Council  
PO Box 52  
FAIRLIE

Attn: Nathan Hole

Dear Sir,

**SUBMISSION ON PLAN CHANGE 15 (TWIZEL) TO THE DISTRICT PLAN AND  
VARIATION 1 TO PLAN CHANGE 13**

1. **Community & Public Health wishes to comment on the proposed plan change**

This submission identifies a number of public health issues that deserve to be considered and incorporated, as appropriate, in PC15 and Variation 1 to PC 13 text and appendices.

2. **Community & Public Health is Neutral**

and neither supports nor opposes the application being only concerned to ensure that if the Plan Change is approved, conditions are imposed that will as far as practicable, mitigate any effects on public health.

3. **The Reasons for Making Submission is:**

'To promote the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health', pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

## Specific Issues are:

- **Safe drinking water and other water sources**

Utilities are important to the wellbeing, health and safety of people. For a water supply utility this means it must provide an adequate, reliable, safe and efficient supply of potable water. Tourists and town dwellers who visit Twizel will have expectations of the quality of town drinking water, i.e. that it is potable. If this is not available, they may unwittingly drink unsafe water and thus be at risk from waterborne diseases.

Water available from the Twizel reticulation appears generally to be of satisfactory quality in relation to the monthly E.coli results submitted to the Public Health Unit. However, we note that the Twizel Drinking Water Supply currently has an Ee grading, which is associated with the highest level of risk to health. An 'E' grade for a plant is likely to mean the water comes from a water source without adequate protection from animal or human contamination, and subsequent treatment, if any, is not adequate. Thus, in addition to the risk of E.coli contamination, there is a real risk of protozoa (cryptosporidiosis and giardia) contamination. Consequently the supply does not fully comply with the Drinking Water Standards for New Zealand 2005 (Revised 2008).

While monitoring is always important, public health risk management plans (PHRMP's) for drinking-water supplies provide the additional benefit of reducing the likelihood of contaminants entering supplies. By the time monitoring shows that contaminants are present, something has already gone wrong and a hazard is already present in the water. The Health (Drinking Water) Amendment Act 2007 will require council to submit Public Health Risk Management Plans. For towns with a population 501 to 5000 the compliance date is 1 July 2014.

PHRMPs encourage the use of risk-management principles relating to the source, treatment, storage and distribution of the supply so that monitoring is not the only water quality management technique used, thus encouraging a multi-barrier approach.

In section 13, Issue 6, Objective 1 – Subdivision Servicing – Policies 5,6 &7 of the document, reference is made variously to water supplies. For the reasons aforementioned it is strongly recommended that all references to a water supply intended for human consumption be standardised and a definition included in Section 3.

It is further recommended that the definition be the same as the definition for potable water as contained in the Drinking Water Standards for New Zealand 2005 (Revised 2008) (DWSNZ2005/08)

Utilities are important to the wellbeing, health and safety of people. For a water supply utility this means it must provide an adequate, reliable, safe and efficient supply of potable water. As such we would seek that wording to this effect be incorporated in section 16.

Further, we propose that "adequate servicing" as referred to in sections 8 and 9 should refer to an adequate, reliable, safe and efficient supply of potable water i.e. one that complies with the Drinking Water Standards for New Zealand.

We would also advocate for adequate servicing in the recreation and open space zone, recreation (active) zone, special travellers accommodation zone and the Ruataniwha Rowing zone. If a potable water supply is not available on-site, or nearby, then every effort should be made to pre-warn visitors by:

- a. identifying the absence of such facilities on maps, brochures and websites, and
- b. identifying the nearest alternative facilities available (such as those within nearest townships)
- c. having signage in place as necessary to direct the public to these alternative facilities.

## **SUBMISSION SUMMARY**

- 1. All references to a water supply intended for human consumption in Plan Change 15 be standardised.**
- 2. A definition of a water supply intended for human consumption be included in Section 3, Definitions.**
- 3. The definition is the same as the definition of “potable water” as contained in the DWSNZ2005/08.**
- 4. Incorporate a suitable phrase in Section 16 – Utilities, referring to** a water supply utility being a means to provide an adequate, reliable, safe and efficient supply of potable water.
- 5. Ruatanwha Rowing Zone, Section 9.2 – Objectives and Policies – Policy 4: refers to “adequately serviced”.** We would advocate for “adequate servicing” in the recreation and open space zone, recreation (active) zone, special travellers accommodation zone and the Ruataniwha Rowing zone to mean a potable water supply.
- 6. If a potable water supply is not available on-site, or nearby,** then every effort should be made to pre-warn visitors.

I do not wish to be heard in support of my submission but can be contacted if any discussion or additional information is required.

Yours Faithfully

Stephen Waller  
Health Protection Officer