



## Submission on Proposed Regional Policy Statement for the Wellington Region, 2009

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I do wish to be heard. I would consider presenting a joint case.

Signed: 

Date: 15 May 2009

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### Submission

#### Policy 18 – Support and Amend

Insert c) *promote the recycling of water, especially on-site*; Insert d) *promote the capture of rainwater on-site*; Insert into Explanation: *The capture of rainwater on-site reduces demand for centralised infrastructure for water provision. The recycling of water on-site reduces demand for centralised infrastructure for water provision and for wastewater treatment. On-site water systems usually have lower life cycle costs (both financial and environmental) than centralised water systems, comparable or reduced risks and greater resilience.*

#### Policy 44 – Support and Amend

Comment: reuse of rainwater and greywater for flushing toilets is 'safe' when done at the domestic (single household) level. The use of recycled water becomes 'unsafe' when it is done on a wide scale where many different households may contact the water both before and after recycling. I submit my paper to the recent NZ Land Treatment Collective conference on Recycled Water as supporting evidence (see Appendix 1). I understand that the Ministry of Health has a very conservative view of greywater recycling, but it is slowly changing its view, eg it now appears to 'support' greywater reuse for garden

irrigation where previously it did not. It certainly now ‘supports’ rainwater reuse where previously it was opposed. I expect that in time it will ‘support’ greywater reuse for toilet flushing in a single domestic dwelling. It appears to offer conditional ‘support’ water recycling on a larger scale – presumably because it traditionally feels more comfortable with centralised infrastructure and does not fully appreciate that the existing risks from this infrastructure often exceed the risks from ‘novel’ decentralised approaches, nor has it so far fully appreciated the relative risks associated with the higher financial and environmental costs of centralised infrastructure and the climate change (and other) benefits of decentralised systems. These are increasingly being researched and becoming understood. I submit a paper by Francis Pamminer of Yarra Valley Water (Melbourne, Australia) which illustrates this nicely (see Appendix 2). In conclusion, I understand that there are complex and diverse influences on the precise nature of this policy and its wording and I commend the careful wording of the policy, which is appropriate given the developing understanding in this area.

Proposed amendment: I would like to see it state that *the reuse of non-kitchen greywater sources is safe for toilet flushing in a single domestic dwelling* but I understand that this may have to wait for next time.

Comment: The current wording that ‘recycled water...can be used for toilet flushing’ must remain as a bare minimum to allow this practice to continue to occur (as is permitted by the Building Act/Code).

Proposed amendment: I would suggest adding *and greywater* to the above wording for clarity.

### **Policy 65 – Support and Amend**

Insert: *Greywater recycling reduces water use and wastewater production, which in turn reduces energy use (water services being a major consumer of energy). Greywater recycling systems should be encouraged in individual households by the provision of information and advice. A reduced (preferably zero) fee should be charged for building consent applications for greywater recycling systems to recognize this benefit, which is directly comparable to the policy adopted for solar hot water systems.*

A similar policy for rainwater tanks should be considered where consent application fees apply.

### **Method 11 – Support and Amend**

Modify: “Prepare and disseminate information about water conservation, *greywater recycling, rainwater harvesting* and the efficient use of water”

**Method 33 – Support and Amend**

Insert: *d) greywater reuse and rainwater harvesting*. Comment: I should like to be consulted during the development of these strategies.

**Method 55 – Support and Amend**

Insert: *d) recycle water on-site*. Comment: on-site water recycling reduces energy use as well as water use and wastewater production.