

**Submission to:** Ministry for the Environment. Te Manatu Taiao

**Proposed National Policy Statement on Renewable Electricity Generation**

**From:** Waitaha Resource Management Committee on behalf of Waitaha

**Date:** 26 October 2008

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**Recommendations:**

1. That the Ministry for the Environment continue the development of the Proposed National Policy Statement on Renewable Electricity
2. That the Minister for the Environment consider developing a companion document that provides a cultural perspective, and highlights an indigenous context for this document; the culture should reflect the culture of New Zealand in respect of sustainable energy generation
3. That the Minister for the Environment ensures there is effective Maori and Iwi participation in developing the Proposed National Policy Statement on Renewable Electricity

**Background of Waitaha**

Waitaha is an ancient tribe of Te Arawa. Waitaha has, at times, occupied areas from Katikati to Otamarakau in the Bay of Plenty. However, Waitaha has in recent years been primarily associated with Te Puke and Tauranga. Waitaha has one marae in Te Puke, Hei Marae, but maintains our identity within Te Arawa, and in lands around Te Puke and Tauranga.

Waitaha are currently negotiating the settlement of our comprehensive historical claims. This is the culmination of over ten years of effort. Waitaha have also been involved with the Environment Court in an effort to have input into the sustainable development and preservation of sites within the Tauranga area.

Waitaha have contributed advice and information to assist with planned development in the areas administered by the Western Bay of Plenty District Council, Tauranga City Council and Environment Bay of Plenty. Representatives of the Waitaha Resource Management Committee have been appointed to a range of committees and working groups with a focus on regional development. Waitaha are committed to contributing positively to Renewable Electricity, particularly as the Tauranga area is one of the fastest growing urban communities within New Zealand. However, Waitaha is also mindful of the need for a wholistic approach that incorporates indigenous values and practices.

We understand there has been some consultation on the proposed National Policy Statement on Renewable Electricity. Waitaha are concerned that iwi and Maori organisations have not been invited to participate with this process.

Waitaha has also included comment on the scale, scope, format and content of the proposed document. If you would like to discuss this further with Waitaha, please contact:

Sandra Potaka, 027-749-3377, email: [waitaha.resource.mgmt@gmail.com](mailto:waitaha.resource.mgmt@gmail.com)

## Support for the proposed National Policy Statement on Renewable Electricity Generation

Waitaha supports the development of the proposed National Policy Statement on Renewable Electricity, on the basis that it provides:

1. An opportunity to improve the of living environment for all New Zealanders
2. A vehicle to introduce the broader paradigm of renewable energy into a national policy document that reflects Maori issues, needs and aspirations;
3. A structural mechanism to positively influence the development of Regional and District Plans; and
4. A basis to inform decision making in respect to Resource Consent applications and hearings, in accord with Maori issues, needs and aspirations.

However, in support of the key components of the National Policy Statement on Renewable Electricity, it is recommended that:

5. By introducing a Maori world view on issues such as sustainability will add value and provide for an integrated, holistic and values based approach
6. That Maori advice and input into the development of the proposed National Policy Statement on Renewable Electricity is critical to the enduring nature of the document; as Treaty partners and significant contributors to the sustainability of Renewable Electricity.

This support is provided that:

7. The principles of Te Tiriti o Waitangi be embedded throughout the proposed National Policy Statement to give effect to it, and;
8. The Ministry for the Environment engage appropriate Maori input to ensure the Maori indigenous world view is provided for, appropriately and effectively.

It is further recommended that:

9. The Ministry for the Environment work closely with Maori at the national and regional level, and to seek iwi partnerships where appropriate, and
10. Consider how to strengthen internal Maori capacity and involvement within the Ministry to support such relationships.

## Context and content of the National Policy Statement on Renewable Electricity

Tangata Whenua	<p>Maori are tangata whenua of New Zealand. As such, there are cultural dimensions which Maori are able to provide that will enhance Renewable Electricity. It is critical that a National Policy Statement on Renewable Electricity acknowledges and actively involves indigenous influences and aspirations.</p> <p>The National Policy Statement should also consider the heritage and history of Maori, not just the recent historical influence of non-Maori settlement. It is important to consider the contribution that Maori have already made toward developing the existing network of electricity generation including, but not exclusive to: hydro, geothermal and wind.</p>
Scope	including issues, objectives and policies that should or should not be considered
Format	The National Policy Statement on Renewable Electricity should

	<p>comprise three main parts:</p> <ul style="list-style-type: none"> <li>• Executive Summary – this should describe the key principles and concepts; and the framework for the National Policy Statement</li> <li>• Objectives – a description of one sentence per objective, with a short explanation</li> <li>• Implementation – a framework for ensuring that future planning and design is in sync with the Policy Statement</li> </ul> <p>There may be a more detailed body of work which could include linkages to other National Policy Statements and associated documents that may need to be considered in terms of urban and rural development initiatives.</p>
Issues	<p>Natural resources are a taonga. They should be protected on a national basis, through the practices of kaitiakitanga; provided there is a national commitment to do so. Te Tiriti o Waitangi in the context of the National Policy Statement on Renewable Electricity has to be strengthened to enable this to occur.</p> <p>The opportunity afforded to Tainui Iwi recently provides them with the mana to proactively manage the Waikato river as a sustainable source of energy – both in terms of electricity (hydro) and in terms of the culture and environment (kaitiakitanga). Their responsibility to work with other iwi and other communities that have a stake in the preservation of the River and its eco-systems, will be undertaken in the context of the tribe’s beliefs and values.</p> <p>The National Policy Statement on Renewable Electricity should also consider the impact on built areas, not just new developments. This is particularly important in coastal and rural communities that may be in future plans for extending an existing or planned Renewable Electricity.</p> <p>The effect of a declining supply of water for domestic and industrial use; the desire of planners to increase the level of electricity supply to newly established communities; and the lack of renewal sources of energy within the scope of those plans; has to be taken into consideration at a national level. If each community was able to produce 1-5% of their own electricity supply, for instance through solar energy, would reduce the pressure on the national grid.</p> <p>There is also a need to recognise the needs and aspirations of the community from an environmental (in the broadest sense) and a socio-cultural perspective as well as commercial. Electricity supply is seen as a right rather than a privilege. However, the users of electricity are not encouraged to seek alternatives such as solar power, because of a number of constraints including but not exclusively the cost. If the National Policy Statement on Renewable Electricity is designed to enable domestic and industrial users to consider and invest in alternatives such as solar, the cultural, environmental and social aspirations of each community could be more effectively incorporated into Renewable Electricity.</p> <p>Urbanisation is fast encroaching on rural and coastal communities. The development of an urban sprawl has to be cognisant of the effect it is having on the environment and the very culture of these rural or coastal communities. Commercial development does not take into consideration the ‘inputs’ into these communities. More housing and</p>

	<p>more industrial development equates to a higher demand for energy and electricity. As stated previously, if the National Policy Statement on Renewable Electricity is able to influence planning decisions, there may be opportunities for planners to incorporate alternative electricity options into their design.</p> <p>Alternative electricity generation has to be considered in light of sustainable resource management. The quadruple bottom line – environmental, social, economic and cultural – approach should be taken to measure the long term effects of New Zealand’s existing electricity generation policies and practices; and to compare those to alternatives such as solar and wind generation.</p>
Objectives	The key objective should be to provide for sustainable development of renewable electricity generation on a national basis that is flexible enough to provide structure for regional and local development to occur.
Policies	
Alternatives	<p>The National Policy Statement on Renewable Electricity needs to be put in place to provide guidelines for all the stakeholders that are already, or will be, involved in planning and development of communities as well as the national supply or transmission of electricity.</p> <p>Mitigation and management of future electricity projects should be considered in the context of a quadruple bottom line. Sustainable local electricity supplies to enhance national electricity supply may be more effective than any attempt at adopting a nationally-based system.</p>
Direction	The National Policy Statement on Renewable Electricity should provide guidelines for those who are involved in all aspects of Renewable Electricity and development. There needs to be a clear directive that Maori heritage and aspirational views are to not only be considered, but that Maori input is critical to be input into future planning.
Scale	The format of the National Policy Statement on Renewable Electricity should incorporate national aspirations, regional plans, and provide at least a planning framework at the functional level i.e. city or neighbourhood. Continued Renewable Electricity for the sake of it puts at risk the level and longevity of the electricity supply chain.
Risks and consequences	<p>Waitaha does not perceive any risks in proceeding with the development of the National Policy Statement on Renewable Electricity.</p> <p>The risk of not proceeding is that planning and development of energy and electricity may continue without the consideration that should be given to environmental and cultural impacts. To Waitaha that means there will be limited opportunity for communities to participate in the overall long term planning.</p> <p>The risk of not considering the cultural impacts within the National Policy Statement on Renewable Electricity document is that there may be limited opportunities for communities to synchronise local activity and national policy.</p>
Alternative energy	<p>There is a need to require developers, through the National Policy Statement to reflect the need to ‘save’ energy or to ‘manage’ energy more effectively.</p> <p>For instance, while it may be a costly exercise to utilise solar energy for</p>

	<p>street lighting, highway lighting, traffic lights, etc., it would be a investment for the future to do that.</p> <p>There could also be a more proactive approach to utilising waste products to generate electricity; or to be used in a different way so that the primary products for generating electricity are those which have very little benefit for the community. An example is the use of the high volume of waste water being recycled for secondary purposes including power generation; that is, the use of technology to extract energy-generating product (e.g. solids to produce methane) from waste-water, with other bi-products to be used for other purposes e.g. compost.</p>
Terms of reference	<p>Extracted from the proposed National Policy document (<a href="http://www.mfe.govt.nz">www.mfe.govt.nz</a>)</p> <ul style="list-style-type: none"> <li>• transporting electricity efficiently over long distances requires pylons, conductors (wires) and cables that create significant environmental effects</li> <li>• the transmission network is extensive and linear, making it important that where possible there are consistent policy and regulatory approaches by local authorities</li> <li>• the linear character of the transmission network can limit the extent that it is feasible to avoid adverse environmental effects</li> <li>• the environmental effects of the transmission network are often local – while the benefits extend beyond the local to the regional and national – making it important that those exercising powers and functions under the Resource Management Act balance local, regional and national environmental effects</li> <li>• extensive investment in the transmission network and significant upgrades are expected to be required to supply demand for electricity and to meet the Government’s objectives for a renewable energy future.</li> </ul>
	<p>The National Policy Statement on Renewable Electricity is also about how electricity is generated, not just how it is transmitted. While safety and aesthetics are important in planning for transmission of electricity, these also have to be considered in terms of environmental and cultural sustainability.</p> <p>It is important to ensure that there is a clear direction toward the research, development and establishment of other energy supply systems – your proposed policies 1 to 4 refer.</p> <p>This policy should be articulating how communities, regions and nationally can develop and/or initiate alternative energy supplies and is reflected in your proposed policy statements 1, 4 and 5.</p>
	<p>A companion document highlighting key Maori concepts would enhance the development of future projects. This would be useful in guiding planners and decision-makers in how to effectively engage with Maori and Iwi, and how to incorporate tikanga Maori (Maori values, beliefs and practices) into the planning process. While acknowledging Te Tiriti o Waitangi is very important, there also needs to be recognition of how the agreements implied in Te Tiriti are put into</p>

effect.

A companion document should also be developed to inform the community about the relative value of utilising natural resources such as geothermal, wind and solar that could be harnessed at a local level to supplement the national dependence on hydro generation. Policies 1, 2 and 3 refer.