

Submission on proposed NATIONAL POLICY STATEMENT for RENEWABLE ELECTRICITY GENERATION

TO: the Chairperson
Board of Inquiry
c/o PO Box 10362
WELLINGTON 6143

FROM: Waikato Raupatu Trustee Company Ltd
Private Bag 542
NGARUAWAHIA

This submission outlines the key issues in relation to specific provisions of the proposed NPS for Renewable Electricity Generation on behalf of the Environmental Unit of the Waikato Raupatu Trustee Company Limited. The WRTCL is the legal and constitutional Iwi Authority for Waikato-Tainui.

Introduction

The proposed NPS aims to secure renewable energy that provides 90 per cent of electricity generated for New Zealand, by 2025. Waikato-Tainui welcomes this initiative, and although the NPS identifies relevant factors to achieve this, the weighting attributed to these factors provides doubt that Iwi interests will be justly accounted for. As Waikato-Tainui has recently signed a Deed of Settlement with the Crown in relation to the Waikato River, in which a Vision and Strategy for the Waikato River has been given the status as an NPS under the RMA; it will be interesting to which of the objectives from both NPS' will be given preference. Waikato-Tainui is adamant that the health and wellbeing of the Waikato River for future generations should be given priority status.

The Waikato River's contribution to the National Electricity Supply

The Waikato River contributes approximately 13% of New Zealand's electricity supply through hydro generation (renewable energy), and a further 27% through thermal generation (Huntly Power Station). This doesn't include bio-energy, co-generation, geothermal and proposed wind generation within the Waikato catchment. Therefore during the scoping exercise to be undertaken, the fact that the Waikato region provides for a large portion of New Zealand's energy supply should be given particular regard in Policy 2 and Policy 3, and possibly be excluded from increasing demand to supply energy.

The Objective and the purpose of National Policy Statements

Waikato-Tainui believe that the purpose of a NPS is to provide the potential for Government to make a real leadership difference to RMA decision making in a manner that will assist

decision-makers, applicants and submitters alike. Waikato-Tainui believes that this NPS does not fulfil that obligation. It does not set a clear expectation that requires local authorities to take specific steps which enable generation development within targeted timeframes.

The objective of this NPS is:

To recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities, such that 90 per cent of New Zealand's electricity will be generated from renewable sources by 2025.

Only policy 4 and 5 state timeframes of 2012, but for each policy the instructions are vague.

Tangata Whenua policy

Although the evaluation of the Objective states that nothing in this NPS suggests that cultural issues or interests shall be overlooked, Waikato-Tainui is resolute in stating that a Tangata Whenua policy should be included. The benefits of this policy would be:

- Security of Maori interests in renewable energy;
- Security of Maori interests in natural resources;
- Recognition of Maori as Kaitiaki of natural resources;
- Ensuring that Iwi are consulted in determining potential renewable energy sites;
- Acknowledgement of our rights as stated in Article 2 of the Te Tiriti o Waitangi.

NPS POLICIES

The following outlines whether Waikato-Tainui supports each policy or recommends changes to be considered.

Policy One

Waikato-Tainui agrees with the benefits in policy one.

Policy Two

Waikato-Tainui would like to include the following as point (v) of policy two:

(v) the location of sites of significance to Iwi

Policy Three

Policy 3 is very interesting in ensuring that the relative degree of reversibility of different generation technologies is recognized and considered by decision-makers when considering applications for resource consent. The concern for Waikato-Tainui is the relative weighting of the degree of reversibility versus the importance of renewable energy to New Zealand and the short term impacts of the development. For example, if the developer can prove that the

degree of reversibility is high and positive, will that then mean that the short term impacts are irrelevant because the project is able to be reversed?

Waikato-Tainui support the thought of a degree of reversibility when the life of the technology generating the energy is no longer required, however, this benefit should not be offset by allowing further if not greater short term degradation to the surrounding environment.

Policy Four

Waikato-Tainui would like the Board to set further timeframes which enable local authorities to assess and prioritise the types of activities to be enabled in their jurisdiction. We can foresee a flood of proposals and applications to generate renewable energy because of this policy, and to meet the deadline of 2012 in which local authorities are to notify plan changes. Therefore Waikato-Tainui insists that all Iwi are directly involved in these decisions to ensure that the renewable energy "goldrush" does not have dire consequences on our area of responsibility.

Policy Five

Waikato-Tainui support the development and operation of small and community-scale distributed renewable electricity generation. Removing barriers to achieve this would be beneficial as it may allow communities to become self-sustaining. The cumulative contribution of this to resolving New Zealand's bigger energy problem has potential and should be explored further. Waikato-Tainui would prefer that (if sustainable), energy sources should be located nearer to the area of demand.

Conclusion

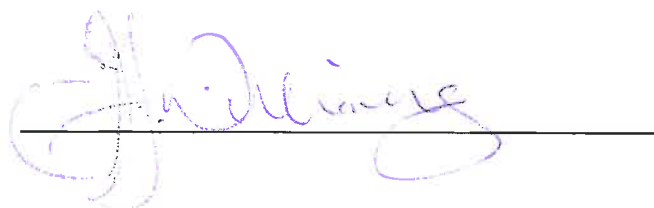
This NPS is welcomed by Waikato-Tainui. Energy supply is an issue that needs to be addressed immediately. However, it should not be done so to the detriment of the environment and cultural values of Maori and New Zealand in general. Waikato-Tainui will submit a further submission to address the manner in which the Waikato River Vision and Strategy should be addressed within this process.

Nga mihinui ki a koutou.

DATED:

29 October 2008

WAIKATO RAUPATU TRUSTEE COMPANY LTD
By its Environmental Officer



Address for Services: C/- Julian Williams
Waikato Raupatu Trustee Company Ltd
Private Bag 542
Ngaruawahia

Telephone: 07-824 8689
Fax: 07-824 5133
Email: julianw@tainui.co.nz