

31 October 2008

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Board of Inquiry
P O Box 10362
WELLINGTON 6143

Attention: Melissa Keys
Email: renewable.electricity@mfe.govt.nz

Dear Melissa

PROPOSED NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION

1. We act for Waitaki Protection Trust ("The Trust").
2. We **attach** submissions for The Trust in the matter of the Proposed National Policy Statement for Renewable Electricity Generation.

Yours faithfully
NORTH SOUTH ENVIRONMENTAL LAW



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Encl.



Submission on Proposal for National Policy Statement for Renewable Electricity Generation

Section 49 of the Resource Management Act 1991

To: The Chairperson
Board of Inquiry

Submission on: Proposed National Policy Statement for Renewable Electricity Generation

Submitter's Name: Waitaki Protection Trust ("the Trust")

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Phone: 09 304 0043
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Date of Submission: 31 October 2008

Submission

1. This is a submission on the Proposed National Policy Statement on Renewable Electricity Generation that was publicly notified on 6 September 2008.

2. The specific provisions of the proposal that my submission relates to are:

The entire policy statement.

3. The Trust's submission is as follows:

3.1 The Trust is a charitable trust incorporated under the Charitable Trusts Act 1957 on 10 September 2007. The Trust was established in response to the Trustees' concerns that, amongst other things, increased demand for hydroelectric power generation on the Waitaki River threatens the river's environmental values. The charitable purpose of the Trust is stated as being:

to protect and preserve the environmental values of the Waitaki River and catchment and to raise public awareness in respect of those environmental values.

- 3.2 The Trust fully supports the policy statement. New Zealand needs to develop, upgrade, maintain and operate renewable electricity generation activities. The Trust also supports the 2007 Energy Strategy's¹ target of having 90% of electricity generated from renewable resources by 2025, which is noted in the policy statement.
- 3.3 Historically New Zealand achieved 90% reliance on renewable electricity generation from at least the 1940s through to the late 1970s. The present 62% renewables share is the result of three decades during which fossil-fuel-fired plants have been given priority in the construction programme, while renewable resources have lain little developed. New Zealand is quite favourably placed, relative to most of the OECD, to undertake a transition back to 90% renewables in electricity over the next decade and a half.
- 3.4 Environmentally friendly energy production developments will secure New Zealand's energy needs for the foreseeable future. The environmental needs of future generations should not be compromised by large, unsustainable and environmentally damaging projects.
- 3.5 New Zealand currently relies heavily on hydro and thermal electricity generation both of which have limitations. Heavy reliance on hydro leaves the electricity system vulnerable to the effects of dry years. Most of the hydro generation systems are "run of the river", which means that there is less generation available when river inflows are low. Consequently market prices increase. More "run of the river" generation will worsen the security of supply and expose the national economy to increased supply risk and prices.
- 3.6 Hydro electricity power generation is no longer environmentally sustainable because it has significant adverse effects on the environment, the majority of which are irreversible. This is in contrast to a number of alternate energy generation options such as wind power.
- 3.7 The utilisation of wind resource, unlike hydro electricity developments, results in minimal displacement of other productive uses of the land because the footprint required for wind turbines and service roads generally equate to less than 2% of the total site. Therefore the remainder of the land continues to be used in its current use.

¹ *New Zealand Energy Strategy to 2050: Powering Our Future - Towards a sustainable low emissions energy system* October 2007 <http://www.med.govt.nz/upload/52164/nzes.pdf>, p.22.

- 3.8 Wind turbines can be dismantled and removed when new more improved versions of electricity generation are developed. The adverse effects of hydro development are irreversible and cannot be avoided, remedied or mitigated as more environmentally sustainable forms of electricity generation become available.
- 3.9 In the South Island there are very few major river systems that now remain unaffected by hydro development. Decision makers must therefore have particular regard to the irreversible effects of hydro development when considering any proposals for additional hydro development in the South Island.
- 3.10 Wind power is now seen as the environmentally sensible energy production option in this country as it is complimentary to the hydro resource. Consequently, when it is windy, wind farms can generate electricity enabling the water resource to be stored. This would have a potentially positive effect on the values associated with the artificial lakes created by hydro development and the remaining stretches of river down stream of these lakes.
- 3.11 Policies which encourage renewable energy will ensure that security of supply is maintained.
- 3.12 The policy statement is consistent with Part II of the Resource Management Act 1991, and in particular section 7(j).
4. The Trust wishes to be heard in support of its submission.
5. If others make a similar submission, the Trust will consider presenting a joint case with them at a hearing.


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Robert Makgill on behalf of
Waitaki Protection Trust