SUBMISSION ON APPLICATION BY MERIDIAN ENERGY FOR CONTROLLED STATUS FOR WAITAKI SCHEME CONSENTS AS PART OF PLAN CHANGE 3 WRP

In my earlier submission to Plan Change 3 I opposed the granting of restricted discretionary status to Meridian Energy. I also oppose the granting of controlled status to its Waitaki consents.

In my original submission I referred to our need, as a country, to retain flexibility over our common resources in rapidly changing circumstances.

When the first consents for hydro generation on the Waitaki were granted, we could not envisage either the extent of the environmental effects or the shape of our energy future, and we might have done things a bit differently. The changes, challenges and understandings of the future are equally difficult to read now.

We do know, however, that current intense worldwide research into new forms of electricity generation, such as perovskites, suggests that we will probably embrace a greater variety of generation technologies sooner rather than later. At the same time, with changes to our climate we will almost certainly have more pressing uses for our water. Under these circumstances it would be unbelievably short-sighted to lose any more control over public water resources than we already have, as the Aoraki Water Trust decision illustrated so clearly a few years ago.

In my earlier submission I also quoted the usefulness the WRAP panel saw in the process of renewal of consents. Further to the reasons they give, I believe that the process of applying for consent renewal helps remind all parties of how the governance machinery should work and that the use of public resources is a privilege open to public consideration. For our regional government system to work, the body elected by the public needs to have the authority to grant, reject, administer and alter the consents. If any one stakeholder has uncontestable power over a resource, it leads to a distortion of our governmental process, where the stakeholder has more power than the authority which represents the public owners, as in the Upper Waitaki catchment, where applications for water go to Meridian for vetting before they are considered by Ecan.

Finally, I think this is a wider issue than can be considered in a Plan Change. If Meridian wish to advance this change to their consent status, the appropriate process should involve a well-signalled forum in which the shareholders in this river - the general public - have the time, information and scope to consider and submit on their request.

Alison MacTavish 9.10.2015