

## Climate Defence Network

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### Form 3 Submission on proposal for national policy statement for renewable electricity generation

*In accordance with section 49 of the Resource Management Act 1991*

**To** the Chairperson  
Board of Inquiry

This is a submission on the (following) proposed national policy statement for renewable electricity generation (the proposal) that was publicly notified on 6 September 2008.

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

The policy as a whole, Policy 1, Policy 4 and Policy 5.
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Our submission is:

<p>The Climate Defence Network (CDN) is a coalition of conservation, outdoors and recreational organisations, social, medical, engineering, resource management, environmental, and development groups throughout New Zealand. CDN was formed to promote and support positive policies and actions that will help reduce and mitigate the serious threats that will result from human induced climate change. CDN remains a strong supporter of New Zealand's continuing action to cut greenhouse gas emissions and to encourage greenhouse gas sinks, within the Kyoto framework.</p>
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<p>CDN supports the introduction of the National Policy Statement on Renewable Energy Generation. This is because CDN believes there is a large future for small embedded electricity generation and that there are several institutional barriers to entry for these systems of which the RMA is only one.</p>
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<p>CDN believes the NPS does not go far enough because it does not prioritise the impacts of climate change on the environment highly enough. The potential impacts of climate change are so severe and far-reaching that mitigating them must be accorded the highest priority.</p>
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CDN strongly agrees with the first part of the preamble about the importance of meeting growing electricity demand and of reducing greenhouse gas emissions. The likely increase in oil and gas prices going forward will lead to an increase in the use of electricity for both public and private transport. This is likely to further increase demand for electricity from renewable sources above that forecast in the New Zealand Energy Strategy.

CDN recognises the need to balance local adverse impacts with national and international benefits; however CDN also believes that the RMA as it stands may place too much emphasis on the adverse local impact on the present generation and not enough emphasis on the national costs and global impacts to future generations. In particular CDN notes that future generations cannot be represented in the Environment Court.

We seek the following changes to the proposal:

CDN believes the wording of Policy 4 is too vague and unclear about what Councils are supposed to do. We submit that it would be better to develop one statement that all Councils could use rather than ending up with different statements in every plan.

We do not wish to be heard in support of our submission.

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Signature of submitter (or person authorised to sign on behalf of submitter)

Date: 31 October 2008

(A signature is not required if you make your submission by electronic means.)

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Contact person: [ <i>name and designation, if applicable</i> ]	Tim Jones Member of the CDN Committee