

27 March 2007

New Zealand Energy Strategy
Ministry of Economic Development
P O Box 1473
WELLINGTON

Dear Sir/Madam

Re Franklin District Council Submission - New Zealand Energy Strategy

Franklin District Council appreciates the opportunity to make a submission to the discussion document “Draft Powering Our Future - Towards a sustainable low emissions energy system”.

Endorsement of Joint Auckland Councils’ submission

On 22 March 2007, Franklin District Council formally endorsed the joint Auckland Councils submission to this discussion document. This joint Councils’ submission covers all of the questions asked in the feedback form and presents submission points which are supported by all Councils in Auckland.

Franklin District Council supplementary submission

There are specific issues of concern to Franklin District Council relating to the proposals in the discussion document which are set out in this submission.

Franklin context - - New Zealand Energy Strategy

In terms of the population growth of Auckland and the implications of Government’s economic transformation Agenda, Franklin may be especially vulnerable to the development of large-scale energy generation or transmission infrastructure because of the amount of rural, undeveloped land which is the primary characteristic of the District. While the current population of Franklin is relatively small in comparison to the Auckland region, Franklin plays an important, but sometimes silent part in the long term sustainability of Auckland.

The Franklin context for the Strategy is that large-scale infrastructure which does not provide intergenerational equity in terms of environmental, social and economic wellbeing is as unpalatable to the communities in Franklin as it is for the communities of Auckland. The Franklin District Council therefore is strongly supportive of innovative approaches to energy generation close to its customers - such as wind turbines on high-rise buildings.

In terms of long term Government policy on energy and climate change, Franklin District Council wishes to continue to be consulted in the development or review of such policies.

Community issues

The Franklin community is concerned at Transpower's lack of consideration of the community's desire for the transmission lines for the Grid Upgrade Proposal to be undergrounded. This is a strong position taken by Franklin District Council and will be continued to be actioned through the Notice of Requirement process that Transpower will undertake.

Also not adequately considered is the effect on the economy of the agricultural and forestry sectors in the District in terms of compensation of land used for the transmission lines activity and the value and flexibility of use of rural land in the immediate location of transmission lines.

Franklin District Council will continue to advocate to the Electricity Commission for information to be provided by Government to the community about the impacts of Transpower's current proposal on the ability of landowners to adapt to climate change or to provide locations for sources of renewable energy. Although it is not the responsibility of the Ministry of Economic Development to provide this information to the Franklin community, Government decisions on Sustainable Land Management and Climate Change are expected to recognise the practical difficulty for the Franklin community in integrating the objectives of Government's policies on energy and climate change.

The issues relevant to Franklin tangata whenua include the limited availability of baseline information in regards to Maori land both under Maori title and general title where there is multiple ownership. It is widely noted that of the percent of Maori land nationally, a major proportion of that land would be in native bush. The opportunities and constraints of Government policy on both energy and climate change need to be clear for the community. Adequate timing has not been provided for robust discussions about the implications of proposed policies amongst local tangata whenua.

However, further consultation with Franklin tangata whenua is necessary and relevant to government climate change policy in terms of the location of renewable energy sources and transmission lines. The Franklin District's west coast areas are exceptionally highly rated for the development of wind turbines. Maori wish to participate in economic development opportunities not as lessors but as entrepreneurs. There are important co-benefits of Maori land owners working with the private sector and Government to improve energy security through judicious use of land. Maori have retained their lands and the significance of unbroken occupation on sustainability in Franklin needs to be recognised in the implementation of a national energy strategy as well as national climate change policies.

At present, Franklin District Council's District Plan is undergoing review in terms of cultural heritage (waahi tapu, urupa, ara, cultural landscapes etc) provisions including schedules relating to cultural sites, and is therefore not currently a comprehensive reference point. It is possible that this situation applies to other areas of New Zealand which needs to be addressed as a project of high national significance.

Franklin is keen to engage with other Government agencies in any further consultation on energy and climate change policies.

Yours faithfully

Mark Ball
Mayor

Phillippa Wilson
Chief Executive