

NPS Urban Development Capacity
Ministry for the Environment
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c/o npsurbandevelopment@mfe.govt.nz

15th July 2016

To whom it may concern,

ENA submission to MFE consultation on *Proposed National Policy Statement on Urban Development Capacity*

The Electricity Networks Association (ENA) appreciates the opportunity to make a submission to the Ministry for the Environment's consultation on "Proposed National Policy Statement on Urban Development Capacity".

The ENA represents the 26 electricity network businesses (ENBs) in New Zealand (see Appendix A) who are providers of critical infrastructure for any new urban developments in New Zealand.

ENA's interpretation of the overall objective of the proposed National Policy Statement (the NPS) is (broadly) that it seeks to ensure that local authorities (LAs) should more robustly and routinely assess future availability of land for housing and businesses use and, where shortfalls are identified, remove barriers to the effective competitive supply of land to address these. In the course of doing so the NPS encourages LAs to consult with infrastructure providers. ENA is supportive of this objective, in particular the following Policies within the NPS that require some consideration of, consultation with and/or input from infrastructure providers: PB3; PB4; PC1, PC2 and PC3; PD9.

Given our overall support for the NPS outlined above ENA has not provided a response to the specific questions raised in the consultation, however there are a few overarching points that we wish to draw to MFE's attention.

ENA notes that under the Interpretation section of the NPS the term 'infrastructure' is defined as "...network infrastructure for water supply, wastewater, stormwater, transport, and passenger transport services." It appears that the NPS specifically **excludes** electricity infrastructure from all consideration in the NPS. Given the criticality of electricity infrastructure to modern society it seems remiss to exclude it from the suite of infrastructure types that LAs should have regard to when assessing and

consulting upon future urban development. The interpretation given in the NPS is also at odds with that provided in the Resource Management Act (RMA) itself, which in its interpretation of ‘infrastructure’ includes:

“...facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person—...”

Given the above ENA requests that the interpretation of infrastructure given in the NPS be expanded to include electricity infrastructure (ideally aligned to the RMA) and also consider other infrastructure such as telecommunications. A number of ENA’s members are involved in the provision of fibre services, and it would be prudent for LAs to consider electricity as well as fibre when considering urban development capacity. If, however, the exclusion of these types of infrastructure is a deliberate omission, we recommend that this is specifically noted and explained in the NPS.

The benefits of this in practical terms are that early engagement and consultation with ENBs in the planning process for developing urban capacity can lead to opportunities for more efficient provision of a range of infrastructure types via ‘infrastructure corridors’. It would therefore be sensible for the NPS to require LAs to engage and consult with their local ENBs when considering the requirements for additional urban development capacity - not least of all because many other types of infrastructure are dependent upon a high quality and reliable supply of electricity to ensure their smooth operation. It would also be helpful if the NPS could describe ways to achieve such consultation efficiently and effectively, something which it does not currently address.

ENA is also concerned that the NPS effectively puts the management of reverse sensitivity in the “too complex basket” (i.e. the effects resulting from sensitive new housing developments being developed too close to existing infrastructure). ENA considers that it would be helpful for development of national direction on this issue, particularly where the proposed RMA reforms and NPS are effectively promoting fast planning and consenting processes with fewer limitations. ENA expect that conflict between existing infrastructure assets and new housing development is more likely to occur in those circumstances.

If you would like to discuss any of the points raised in this submission in further detail please contact Richard Le Gros (details below).

Yours sincerely,

Graeme Peters

Chief Executive

Electricity Networks Association

For more information contact Richard Le Gros, richard@electricity.org.nz

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Appendix A – ENA Member Companies

Alpine Energy

Aurora Energy

Buller Electricity

Counties Power

Eastland Network

Electra

EA Networks

Horizon Energy Distribution

Mainpower NZ

Marlborough Lines

Nelson Electricity

Network Tasman

Network Waitaki

Northpower

Orion New Zealand

Powerco

PowerNet

Scanpower

The Lines Company

Top Energy

Unison Networks

Vector

Waipa Networks

WEL Networks

Wellington Electricity Lines

Westpower