

21 August 2023

Consultation: Review of the Building Consent System  
Building System Performance Building, Resources and Markets  
Ministry of Business, Innovation and Employment  
PO Box 1473  
Wellington 6140  
Sent via email: [building@mbie.govt.nz](mailto:building@mbie.govt.nz)

To whom it may concern,

Electricity Networks Aotearoa (ENA) appreciates the opportunity to submit on the review of the building consent system (the review).

ENA is the industry membership body that represents the 27 electricity distribution businesses (EDBs), listed in Appendix A, that deliver electricity to homes and businesses across Aotearoa. ENA harnesses the collective expertise of members to promote safe, reliable and affordable power for our members' customers.

The EDBs of New Zealand own and maintain over 150,000 km of electricity lines across the country. This critical national infrastructure supports the day-to-day wellbeing of New Zealanders and is vital to the functioning of the economy.

ENA has only one substantive matter to contribute to the review: to highlight the importance of embedding compliance with Electrical Code of Practice for Electrical Safe Distances: 2001 (NZECP34) into the building consents process. The last several years have seen a significant increase in construction activity, particularly the construction of new homes in existing urban areas (brownfield sites). In many cases, these developments are seeking to maximise the land available to them by building up to or as close to the property boundary as possible. This is a change in approach from much of the previous urban development that has been seen in New Zealand.

An increasingly common outcome of this new approach is that many structures are being built where they will come into dangerously close proximity of existing overhead electricity lines, and be non-compliant with NZECP34. Often, the local EDB will only become aware of this non-compliance when the development is under construction or has been built. We therefore think a practical solution to ensure compliance before a sod of soil is turned, is to embed a compliance check into the building consent process.

We are agnostic as to how exactly this is achieved, although we understand one of our member companies, Vector, will be making a submission to this consultation proposing to replicate the restrictions in NZECP34 at a Building Code level. This seems to us to be a practical means to ensure that buildings will not be granted consent if they would, once constructed, not comply with NZECP34. This in turn will save developers and EDBs significant time and expense that would otherwise be incurred to rectify non-compliant situations that only become known to the EDB once the building is constructed. We support Vector's submission and urge the review to place extra weight on the points Vector has raised.

ENA is happy to provide further information and assistance to the review process if that would be helpful. Please contact Richard Le Gros, Policy and Innovation Manager, in the first instance – [richard@electricity.org.nz](mailto:richard@electricity.org.nz).

Yours sincerely



Richard Le Gros  
Policy and Innovation Manager

## Appendix A: ENA Members

Electricity Networks Aotearoa makes this submission along with the support of its members, listed below.

Alpine Energy  
Aurora Energy  
Buller Electricity  
Centralines  
Counties Energy  
Electra  
EA Networks  
Firstlight Network  
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