

# ENA submission to New Zealand's New Planning System: Testing the approach to National Policy Direction

**Submission to the Ministry for Cities, Environment, Regions & Transport**

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# 1 Introduction

Electricity Networks Aotearoa (ENA) appreciates the opportunity to provide feedback on *New Zealand's New Planning System: Testing the Approach to National Policy Direction*.

ENA represents New Zealand's electricity distribution businesses (EDBs), which own and operate the local and regional electricity networks that deliver electricity to more than two million homes and businesses.

EDBs operate across urban and rural areas and multiple planning jurisdictions. Consistent and enabling national direction for electricity distribution has therefore been a longstanding priority for the sector.

ENA supports the Government's intention to provide clearer national direction through the new planning system. A more integrated national framework has the potential to provide greater certainty, reduce duplication and better support the timely development and operation of infrastructure.

This consultation is testing whether the thematic structure is clear, whether the illustrative NPD shows how National Policy Direction could work in practice, whether important gaps or trade-offs are missing, and how the approach could be improved.

ENA's submission responds to those questions from an electricity distribution perspective.

We recognise that separate statutory consultation will follow on the proposed NPD. Our comments therefore focus on the proposed policy architecture and the issues that should be addressed as the detailed NPD and national standards are developed.

## 1.1 Executive summary

ENA considers the thematic structure of the illustrative NPD is generally clear and provides a useful indication of how National Policy Direction could operate under the new planning system.

The dedicated Infrastructure theme is particularly useful. ENA supports the recognition of the national, regional and local benefits of infrastructure; the operational and functional need for infrastructure to locate in particular environments; protection from incompatible land uses and reverse sensitivity; identification of future infrastructure corridors; and the proposed approach to infrastructure resilience.

ENA has identified four areas that need further work:

- electricity distribution should be more clearly recognised within the Energy infrastructure sub-theme;
- regional spatial planning should consider future network capacity and planned investment, not only existing capacity;
- the NPD should give clearer direction on how competing national priorities are to be resolved; and
- the new NPD and national standards should preserve the benefits of the recently developed NPS-EN and NES-ENA.

Overall, ENA considers the proposed approach is a sound starting point. The main opportunity is to provide clearer recognition of future network development, stronger integration between spatial planning and infrastructure investment, and greater certainty where national priorities conflict.

## 2 Overall approach to National Policy Direction

### 2.1 A single, integrated NPD

ENA supports bringing national policy direction together within a single NPD. This has the potential to provide a more coherent national framework and reduce the need for councils, infrastructure providers and others to repeatedly work through how separate national instruments interact. The value of this approach will, however, depend on whether the NPD also provides clear direction where national priorities conflict.

### 2.2 Giving effect to the goals and resolving conflicts

The Planning Act 2026 and Natural Environment Act 2026 give the NPD an important role in the new system. The NPD must particularise the statutory goals and direct how they are to be achieved, including by identifying and providing for the resolution of conflicts as far as practicable.

ENA considers the illustrative NPD generally does a good job of providing more detailed direction on the individual goals. In many areas, the directives give a clearer indication of the outcomes expected through regional spatial plans and plans.

The approach is less clear where those goals conflict. The illustrative NPD often directs decision-makers to manage interactions, maximise compatibility or minimise conflicts. In other places, much of the practical detail appears to be left to future national standards. That may not be enough where competing outcomes cannot both be achieved. For example, infrastructure may have an operational or functional need to cross an area containing significant environmental or heritage values, or urban growth may create competing demands for productive land and infrastructure.

The benefit of a single NPD should be that these policy trade-offs are resolved as far as practicable at the national level, rather than being reconsidered through each regional spatial plan, plan or consent process. This is particularly important for electricity networks. Electricity infrastructure is linear and cannot always avoid areas containing other identified values.

The interaction between infrastructure and commercial forestry is a practical example of the conflict-resolution issue. Forestry near electricity infrastructure can create safety, access and network reliability risks. EDBs need to be able to access their infrastructure, undertake necessary vegetation management and manage the risk of trees damaging network assets. The final NPD should ensure that provisions enabling commercial forestry do not prevent appropriate controls being used to protect electricity infrastructure. This should include the ability to maintain appropriate separation from electricity lines, retain reasonable access for network works, manage risks from falling trees and avoid damage to electricity assets.

The indicative national standards for commercial forestry do not themselves resolve how forestry provisions and infrastructure protection will interact. ENA considers this is the type of issue that should be resolved through the national framework rather than left to individual councils.

ENA recommends testing each identified conflict between statutory goals to make sure the final NPD provides a sufficiently clear outcome where compatibility cannot be achieved. National standards can then provide the detailed methods, thresholds and rules needed to implement that outcome.

## 3 Cross-cutting directives

### 3.1 Reverse sensitivity and incompatible land uses

ENA supports the proposed direction for managing reverse sensitivity and incompatible land uses.

Development around electricity infrastructure can constrain access, maintenance, vegetation management and normal network operations. It can also create pressure for existing assets to be altered or relocated to accommodate activities that establish later.

Lawfully established infrastructure should be able to continue operating without unreasonable constraints from subsequent development.

ENA also supports nationally consistent use of tools such as zoning, buffers and setbacks, including to protect planned infrastructure and future infrastructure corridors.

### 3.2 Regional spatial plans and infrastructure capacity

ENA supports infrastructure being considered early through regional spatial planning.

Regional spatial plans can improve coordination between growth decisions and infrastructure investment and give infrastructure providers greater visibility over future demand.

Care is needed, however, with any direction that prioritises growth only where infrastructure can already support it. Electricity network capacity is not fixed. EDBs can invest in additional capacity where future demand is sufficiently certain. Spatial planning should therefore consider both where existing and planned infrastructure can support growth and what new infrastructure will be needed to support growth in otherwise suitable locations. This better reflects the Planning Act 2026 goal of enabling infrastructure to meet current and future demand.

Regional spatial plans should consider existing network capacity, planned investment, future demand, likely network upgrades, future infrastructure corridors, and the sequencing of growth and infrastructure investment. EDBs need to be directly involved in this process.

Councils will not necessarily hold the technical information needed to identify electricity capacity, emerging constraints, future network requirements or the most efficient way of expanding a network. ENA recommends that early and ongoing engagement with relevant infrastructure providers be an explicit part of regional spatial planning.

### 3.3 Avoiding unnecessary duplication

ENA supports avoiding unnecessary duplication of matters already regulated under other legislation. Planning controls should focus on land-use and environmental effects rather than duplicating technical, safety or economic requirements that are already managed through other regulatory regimes.

## 4 Theme 2: Infrastructure

ENA broadly supports Theme 2. The generic infrastructure provisions go a significant way towards giving effect to the Planning Act 2026 goal of enabling infrastructure to meet current and future demand. Our comments below focus on ensuring this enabling intent carries through into spatial planning and network development over time.

## 4.1 Strategic infrastructure priorities

ENA supports regional spatial plans identifying strategic infrastructure priorities over the long term.

Given the 30-year horizon of regional spatial plans, the framework should allow infrastructure priorities and corridors to be expressed at an appropriate level of detail and updated as demand forecasts and investment plans evolve. Strategic infrastructure priorities should therefore be able to include network programmes, future capacity requirements, major upgrades and future corridors, as well as individual projects.

EDBs should also have a central role in identifying these priorities, as they are best placed to determine how their networks may need to develop in response to future growth and demand.

## 4.2 Enabling infrastructure

ENA supports INFRA-Directive 1.2, particularly its recognition of the national, regional and local benefits of infrastructure and its operational or functional need to locate in particular environments. This is important for electricity networks. Network routes are constrained by existing assets, demand, generation connections and technical requirements. It will not always be possible to avoid areas where other planning values are present.

The recognition of operational and functional need should therefore apply consistently when other NPD themes and directives are implemented. The NPD should also recognise the role of infrastructure providers in determining routes and locations, given their technical knowledge of network design, capacity, resilience and safety.

## 4.3 Existing infrastructure

ENA supports the intent of INFRA-Directive 1.3 to enable existing infrastructure to maintain, increase or improve the services it provides. The final NPD should ensure this covers the ordinary lifecycle of electricity networks, including operation, maintenance, repair, replacement, upgrading, capacity increases, resilience works and ancillary activities.

ENA also supports the concept of an operational envelope, but the treatment of works outside that envelope needs further consideration. The illustrative NPD appears to recognise upgrades or relocations outside the operational envelope where they improve safety or resilience, introduce new technology or reduce environmental effects.

Those are useful circumstances to recognise, but they are not the only reasons an electricity network may need to change. Networks also need to expand and be reconfigured to support population growth, connect new customers and generation, meet increasing demand and support electrification. The final NPD should avoid an outcome where a capacity-driven upgrade faces a materially more restrictive planning pathway simply because it extends beyond the existing footprint of an asset.

The operational envelope should be defined broadly enough to accommodate routine electricity network activities, including pole and conductor replacement, transformer upgrades, vegetation management, undergrounding and associated access and earthworks, without triggering unnecessary consent requirements.

## 4.4 Protecting infrastructure and future corridors

ENA strongly supports protecting existing and planned infrastructure and enabling its continued operation, maintenance, upgrading and expansion. We particularly support recognition of future infrastructure corridors.

Long-term network planning can occur well before an exact route or detailed design is known. Regional spatial plans should therefore be able to identify and protect a broad corridor for future infrastructure without requiring an EDB to determine the final alignment too early.

Land-use plans should then manage activities within or near those corridors so future infrastructure is not made unnecessarily difficult or costly to deliver. The final provisions should also recognise the access required to inspect, maintain, repair, replace and respond to emergencies affecting network assets.

The NPD and national standards should also support compatible co-location of electricity infrastructure within existing transport and infrastructure corridors, particularly road corridors. National standards should retain nationally consistent protections from third-party activities that could damage or compromise electricity infrastructure, building on the approach recently developed through the NES-ENA.

## 5 Energy infrastructure

ENA supports the overall intent of the Energy infrastructure sub-theme, particularly INFRA-Directive 2.1 and its focus on energy security, resilience, independence and the transition to a low-carbon economy.

INFRA-Directive 2.1 should be capable of capturing electricity distribution infrastructure. Distribution networks are an essential part of the wider energy system and will play an increasing role in supporting electrification, connecting new generation and load, and maintaining a secure and resilient electricity supply. However, the term “energy system” does not appear to be separately defined in the illustrative NPD, while the narrower term “renewable energy system” is defined.

The final NPD should make clear that INFRA-Directive 2.1 applies to the whole electricity system, including generation, transmission, distribution and storage.

Beyond INFRA-Directive 2.1, there is relatively little within the Energy infrastructure sub-theme that directly addresses electricity distribution networks. In particular, INFRA-Directive 2.4 is directed at enabling the renewable energy system to be significantly developed and expanded.

ENA supports strong direction for renewable generation and the infrastructure needed to support it. However, this is narrower than the infrastructure required to operate and develop the electricity distribution system as a whole. EDB investment is driven by a range of factors, including housing and commercial growth, electrification of transport and industry, customer connections, resilience, distributed energy resources and changing electricity demand. New or upgraded network infrastructure will not always be directly attributable to a particular renewable generation source.

For example, an EDB may need to upgrade a substation, feeder or distribution line primarily to meet increasing demand from housing growth or electrification. That infrastructure supports the transition to a low-carbon economy, but it is not clear that it would benefit from direction focused specifically on the “renewable energy system”.

ENA therefore recommends that the final NPD include specific direction enabling the development and expansion of electricity networks as a whole.

For example:

*Land use plans and natural environment plans must enable the development and expansion of electricity networks required to meet current and future electricity demand, connect generation and load, support electrification, and maintain or improve electricity system resilience.*

This would complement the generic infrastructure provisions while filling the gap between the broad strategic direction in INFRA-Directive 2.1 and the more specific renewable energy direction in INFRA-Directive 2.4.

Regional spatial plans should also consider not only opportunities for new generation but the transmission and distribution infrastructure needed to connect that generation and meet future demand.

## 6 Natural hazards and infrastructure resilience

ENA supports the proposed approach to infrastructure resilience. Electricity networks need to serve communities that may themselves be exposed to natural hazards, so avoiding hazard-prone areas will not always be practicable.

Resilience can instead be managed through network design, redundancy, asset management, investment and emergency preparedness. Infrastructure should therefore not be restricted simply because an asset is exposed to a natural hazard, provided the risk is appropriately managed.

The final NPD should make clear how this infrastructure-specific direction interacts with the broader system-wide natural hazard directives.

## 7 Commercial forestry and electricity infrastructure

The interaction between infrastructure and commercial forestry provides a practical example of the conflict-resolution issue discussed in section 2.2. Forestry located near electricity infrastructure can create safety, access and network reliability risks.

The final NPD should ensure that provisions enabling commercial forestry do not undermine the safe and reliable operation of existing or planned electricity infrastructure. This includes providing for appropriate separation distances, vegetation management, access for maintenance and emergency works, and measures to manage risks from falling trees and forestry operations.

Where new electricity infrastructure needs to be located in or go across areas used for commercial forestry, the NPD should also recognise operational and functional need and provide an enabling pathway where adverse effects can be appropriately managed.

The NPD should avoid leaving infrastructure providers and councils to reconstruct the intended balance between competing national priorities through each individual plan or consenting process.

## 8 National standards and implementation

ENA strongly supports national standards being used to provide consistent implementation of the NPD. This is particularly important for EDBs that operate across multiple local authority boundaries. Different rules for substantially the same network activity add unnecessary cost, complexity and delay.

Where additional controls depend on identified natural, cultural or heritage values, those values should be identified using nationally consistent methods and clearly mapped and accessible to infrastructure providers. EDBs need to be able to identify applicable constraints before planning routine maintenance, upgrades or new infrastructure.

ENA supports the indicative focus on engagement with infrastructure providers, infrastructure timing and sequencing, reverse sensitivity, and standardised provisions for common infrastructure activities.

The NPD should establish the substantive policy outcomes and resolve competing national priorities as far as practicable. National standards should then provide the detailed methods, thresholds and rules needed to implement those outcomes consistently. This distinction is important to avoid difficult policy trade-offs simply being deferred from the NPD into lower-order planning processes.

Where an NPD directive relies on national standards to determine how it will operate, the relevant standards should be developed and commence alongside the NPD. This will avoid an interim period where the policy direction is in place but the rules needed to implement it consistently are not.

### 8.1 Transition from existing national direction

ENA considers it important that the new system preserves the gains made through the recently developed NPS-EN and NES-ENA. These instruments were designed to address longstanding inconsistency in the treatment of electricity distribution infrastructure and provide a more enabling national framework.

ENA supports the proposal for future infrastructure standards to draw on this work. The transition should not unnecessarily reopen recently settled policy issues or reintroduce variation between planning jurisdictions.

ENA would welcome continued engagement with officials on how the NPS-EN and NES-ENA will transition into the future NPD and national standards.

## 9 Definitions

Terminology in the NPD and national standards should align, where possible.

### 9.1 Infrastructure

ENA supports the inclusion of electricity lines and associated facilities within the proposed definition of infrastructure. As the detailed drafting is developed, ENA recommends ensuring that the definition aligns with the electricity network terminology recently developed through the NPS-EN and NES-ENA and clearly includes the associated assets needed to operate an electricity distribution network.

Consistent terminology will reduce uncertainty and avoid different parts of the same network receiving different treatment.

## 9.2 Operational envelope

ENA supports the operational envelope concept. The definition already recognises associated access and ancillary infrastructure activities. As the drafting is developed, it should also be tested against the practical working space EDBs require for safe operation, including safety clearances, inspection, maintenance, replacement and upgrading of linear network infrastructure.

# 10 Conclusion

ENA broadly supports the proposed approach to National Policy Direction.

The thematic structure is clear and the Infrastructure theme contains a number of useful and enabling provisions. The main areas requiring further work are clearer recognition of electricity distribution within the Energy infrastructure provisions, a more forward-looking approach to infrastructure capacity in regional spatial planning, and clearer resolution of competing national priorities.

ENA welcomes continued engagement as National Policy Direction is developed.

## 11 Appendix A

Electricity Networks Aotearoa makes this submission along with the support of its members. Listed below are the 28 electricity distribution businesses represented:

- Alpine Energy
- Aurora Energy
- Buller Electricity
- Centralines
- Counties Energy
- EA Networks
- Electra
- Electricity Invercargill
- Firstlight Network – owned by Powerco
- Horizon Networks
- MainPower
- Marlborough Lines
- Network Tasman Limited
- Network Waitaki
- Northpower
- Orion New Zealand
- OtagoNet – represented by PowerNet
- Powerco
- Scanpower
- The Lines Company
- The Power Company – represented by PowerNet
- Top Energy
- Unison Networks
- Vector
- Waipā Networks
- WEL Networks
- Wellington Electricity
- Westpower