



From the Electricity Networks Association (ENA)

Submission on draft Report on Using Land for Housing

Submission to the Productivity Commission

4 August 2015

1. The Electricity Networks Association (ENA) appreciates the opportunity to make a submission to the Productivity Commission on its draft report '*Using Land for Housing.*'
2. ENA represents all of New Zealand's electricity distribution businesses (EDBs) or lines companies, which provide critical infrastructure to NZ residential and business customers.
3. We were pleased to see that your draft report recognises the importance of considering associated infrastructure when looking at tools to facilitate new housing developments. Your draft report also touches on many areas of considerable interest to the electricity distribution sector. We would welcome the opportunity to meet with you, along with our Resource & Environmental Planning Forum to discuss more specifically the issues, ideas and impacts of potential changes on the EDB sector.

Housing and Infrastructure – A tandem approach

4. As noted above, we were pleased to see that your draft report recognises the importance of considering associated infrastructure when looking at tools to facilitate new housing developments. Better strategic planning, information sharing, collaboration and coordinated processes (such as at the consent stage) can help to facilitate more optimal developments and help to reduce the time taken for developments to become operational. Early notification and consultation can also help avoid negative impacts in regard to existing infrastructure too. We therefore are generally supportive of moves to promote early consultation with utilities (both at the council plan development level, and when new housing is being planned). To that end, we endorse taking a 'left arm/right arm' view of housing and network infrastructure provision.
5. The benefits of 'riding tandem' was also recognised in the Housing Accords and Special Housing Areas Act 2013 where accelerated processes for housing also provided for the infrastructure that is needed to service such developments. The importance of being able to consult with utilities was also recognised in this Act.
6. Your draft report touches on many areas of considerable interest to the electricity distribution sector, including:
 - Integrated & Spatial Planning
 - Possible changes to the appeals & notifications processes
 - Possible changes to engagement processes on district plans
 - Designations
 - Capital versus land rating changes
 - Covenants
 - Compulsory Acquisitions
 - Paying for infrastructure/funding
 - Lessons learnt from the Housing Accords and Special Housing Areas Act
 - Cost/benefits of an NES for infrastructure
 - Case for an urban development authority

7. Many of these issues/associated ideas were however only briefly mentioned in the report, particularly in regard to utility providers such as EDBs. In our reading at least, the report is more focussed on the infrastructure typically provided by councils themselves (such as water & waste water). We would very much welcome the opportunity to be able to discuss these with you in more detail, including in regard to the issues and impacts on EDBs.
8. We submit that future work could benefit from more thinking on how to encourage early consultation and integration with other utility providers. Future work also needs to consider carefully any impacts on other utility providers as the details of any changes are developed.

Meeting with the Resource & Environmental Planning Forum

9. The ENA regularly hosts a Resource & Environmental Planning Forum, attended by key staff from member companies involved in the planning and delivery of new infrastructure. They have a sound knowledge in regard to the above topics, including the degree to which planning integration is occurring, and ideas for improvement.
10. For example, for our submission on the Housing Accords and Special Housing Areas Bill, a forum member advised that:

[Without] “Guiding parameters, staged release of land or other strategic direction on the roll out of urbanisation of this land.. It will instead [be left] to landowners to undertake a structure plan for a defined area.. However this fails to put some strategic elements in place and to guide the overall strategic investment in infrastructure upgrades to service these areas. This raises the risk that the locations of growth will be fragmented and piecemeal. There is a need for the legislation to recognise the issue of servicing with infrastructure and to ensure that Councils are encouraged to provide some strategic planning so that it is clear which areas are cost effective to service. As it is the developer of the land (and end purchasers) which will pay for costs of servicing the land, it is a false economy to release land in a fragmented manner as the costs of servicing the land will be higher and so it does not assist with the overall aim of housing affordability. There is a need for a more planned and co-ordinated approach to land use and infrastructure planning if new housing areas are to be fast tracked. This more than ever requires the Council to take a proactive approach to co-ordinating land use and infrastructure.”

11. We would like to invite the Productivity Commission to attend an upcoming meeting of the ENA Resource & Environmental Planning Forum to tap into its expertise, and to discuss the matters and possible changes raised in your draft report more fully. This would also provide an opportunity for us to update you on the work the forum is doing in regard to facilitating more standardisation under the RMA for EDBs. The forum can also advise on any lessons learnt to date in regard to the Housing Accords and Special Housing Areas Act.
12. The ENA’s contact person for this submission, and regarding setting up a meeting, is:

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