

11 April 2024

Environment Committee
Parliament Buildings
Private Bag 18041
Wellington 6160

Vector Limited
110 Carlton Gore Road
PO Box 99882
Newmarket
Auckland 1149
+64 9 978 7788 / vector.co.nz

By email: en@parliament.govt.nz

Fast-track Approvals Bill 2024

1. Vector welcomes the opportunity to submit on the Fast-track Approvals Bill **[the Bill]** and broadly supports its purpose and intended benefits.

Introduction:

2. Vector is New Zealand's largest electricity distributor, providing more than 612,000 electricity connections across Auckland between Papakura and Wellsford. Our network is exposed to, and potentially impacted by, projects that are likely to pass through the Fast-track Approvals process once enacted.
3. Our submission focuses primarily on ensuring that the purpose of the Bill is achieved while reducing the potential for unintended consequences. Vector makes the following comments and recommendations:

Eligibility Criteria

4. Vector's electricity distribution network constitutes infrastructure of regional significance; however, delivery of our projects is an iterative process carried out on a local or sub-regional basis via network extension, upgrade, and reinforcement. The Bill appears to only cater to the delivery of new infrastructure, excluding the potential for electricity network operators to make use of the parallel approval processes enabled by the Bill – particularly around vegetation management.
5. Although most of our consenting timeframes are not significant, aspects of the Bill would have significant benefits to the efficient operation of electricity distribution networks were they applicable to network maintenance, upgrades and reinforcement – which does not currently appear to be the case. This includes approval processes under the Conservation Act 1987, Reserves Act 1977, Wildlife Act 1953, and Heritage New Zealand Pouhere Taonga Act 2014, which can add significant time, complexity, and overlapping priorities to essential work under the standard approval processes. This is particularly relevant to the multi-process approvals required for standard maintenance of vegetation around Vector's overhead network – particularly in lower-density rural and semi-rural environments where significant vegetation is present.

Recommendation:

- a. That scope for significant sub-regional maintenance and upgrade projects is included in clause 17 of the Bill for referred projects.

Matters to be covered in assessment of environmental effects

6. In the interests of the Bill being future-focused and aligned with the proposed Resource Management Act 1991 (RMA) reforms, we note that clause 14 of Schedule 4 of the Bill specifies matters such as 'aesthetic' and 'spiritual' values that do not appear to be aligned with the objectives of the reform and may introduce ambiguity to assessment and decision-making processes.

Recommendation:

- a. That clause 14 of Schedule 4 is redrafted to appropriately align the matters to RMA reform objectives.

Consultation requirements for applicants for approvals

7. Electricity distribution networks by their nature are exposed to and interconnected with activities likely to be listed or referred to the panel.
8. Additionally, notices of requirement – those that protect land for the designated purpose until a final decision on whether to confirm the designation is made by the requiring authority - can have significant adverse effects on the planning, operation, and maintenance of electricity distribution networks. This is particularly the case where notices of requirement affect a significant asset such as a substation facility or associated linear infrastructure in road and motorway corridors.
9. Auckland is subject to significant additional infrastructure growth and redevelopment, which can constrain the availability of space in shared utility corridors. If these shared utility corridors are not used efficiently and equitably, designated works can exclude critical pathways for the development of subtransmission routes and large customer feeders.
10. It is therefore essential that an opportunity is provided to input into the process to avoid unintended consequences – both for networks and for the relevant projects. Conditions on resource consents and designations (e.g., management plans) may not provide early enough consideration of such impacts, and opportunity should be provided during the decision-making process.

Recommendation:

- a. That clauses 14, 16, 19, and 23 of the Bill include specific provision for consultation with network utility operators – particularly lifeline utilities such as electricity distribution and transmission networks.

Interdependencies with other regulations

- 11. Vector, along with the wider electricity distribution sector, is currently seeking a solution to address increasing non-compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances: 2001 (ECP34). It is critical that listed and referred projects (particularly urban housing and similar developments) are required to demonstrate compliance with ECP34 where a project is in proximity to overhead lines to avoid unanticipated social and economic harm, including risk of electrocution causing injury or death. This would be complementary to our recommendation to include consultation with network utility operators.

Recommendation:

- a. That evidence of compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances: 2001 (ECP34) is incorporated into Schedule 4, clauses 12 (Information required in consent applications), 15 (Information required in applications for subdivision or reclamation) and 16 (Information required in notices of requirement) of the Bill.