



10 February 2023

Committee Staff
Environment Committee
Parliament Buildings
Wellington

environment@parliament.govt.nz

Dear Environment Committee

Orion Submission on the Spatial Planning Bill

1. Orion New Zealand Limited (“Orion”) thanks the Environment Committee for the opportunity to comment on the Spatial Planning Bill (SP Bill).
2. Orion supports the introduction of the NBE Bill and the Spatial Planning Bill. We are looking forward to the introduction of the Climate Adaptation Bill. Reforming the Resource Management Act 1991 (RMA) is essential if we want a system that is integrated, cheaper and easier to use, enables infrastructure and responds to the climate emergency.
3. Orion also supports the submission of the Electricity Networks Association on the RMA Reforms.
4. Orion owns and operates the infrastructure that distributes electricity to over 219,000 customers in central Canterbury. As one of the largest electricity distribution networks in Aotearoa New Zealand, we cover remote rural areas, regional towns and Christchurch City.
5. Orion is a community owned company with two shareholders – an 89% shareholding by Christchurch City Holdings Limited (which is 100% owned by Christchurch City Council) and an 11% shareholding by Selwyn District Council. Orion also owns Connetics Limited (100% shareholding). Connetics designs builds and maintains electrical infrastructure across Aotearoa New Zealand.
6. As Aotearoa New Zealand transitions to a low carbon economy, the energy sector has a critical enabling role to play. The electricity distribution system will be particularly crucial to enable the public to take advantage of new technologies that will lower our carbon footprint.
7. At Orion, our purpose is powering a cleaner and brighter future with our community. We want to ensure that we are a vital player in that transition for our community, our region and Aotearoa New Zealand.
8. We are also committed to sustainability - we want to sustainably manage the economic, environmental and social effects of our business to achieve strong connected communities, a healthy environment and a prosperous economy. By acting ethically, transparently and responsibly, we can create long-term value for our shareholders and our wider community.

9. We would like to raise with the Committee a matter of concern that we have with the SP Bill. We also refer you to one of our submission points, in our submission on the Natural and Built Environment Bill, on the length of time it will take for the new legislation to come into force. We reiterate that concern with the SP Bill.

Engagement process for regional spatial strategies

10. The SP Bill provides for the development and implementation of long-term, strategic spatial planning across New Zealand through the development of regional spatial strategies. As noted in *Our Future Resource Management System: Overview – Te Pūnaha Whakahaere Rauemi o Anamata: Tirowhānui*¹ “RSS [Regional Spatial Strategies] will play a critical role in driving and enabling change across the resource management and funding systems.”
11. Regional spatial strategies will need to provide strategic direction on, amongst other things, major existing, planned, or potential infrastructure or major infrastructure corridors, networks, or sites (including existing designations) that are required to meet current and future needs. This is to the extent that the regional planning committee considers they are of strategic importance to the region.
12. We note that each regional planning committee will have significant flexibility to design its own engagement approach and process with the community and key sector groups. Clause 32 of the Bill states that the process must be designed to encourage participation by the public and all interested parties, particularly those who may be involved in implementing the regional spatial strategy.
13. However, under clause 35 the process may include hearings but there is no statutory obligation to do so.
14. Our submission is that at a minimum there should be a provision for hearings. Regional spatial strategies are going to be **critical documents** especially for infrastructure providers. These are the documents that are going to be setting out the vision and objectives that will guide each region for the next 30 years. Whilst there is a requirement in Schedule 4 of the Bill that a regional planning committee must give interested parties (of which Orion is likely to be one) and the public a reasonable opportunity to provide written submissions on the draft strategy, there is still no statutory right to present an oral submission at a hearing (and no requirement to have a hearing). We submit that clause 35 of the Bill should be amended as follows:

35. Process may include hearings

- (1) *The process required by section 30 ~~may~~ must include hearings.*
- (2) *~~If the process includes hearings,~~ Subpart 3 of Part 2 of Schedule 7 of the Natural and Built Environment Act 2022 applies to those hearings with the necessary modifications.*

¹ Ministry for the Environment. 2022. See page 25.

Concluding remarks

15. Thank you for the opportunity to provide this submission. We wish to be heard in support of this submission.
16. We do not consider that any part of this submission is confidential. If you have any questions about this submission please contact Vivienne Wilson, Policy Lead, Orion New Zealand Ltd at vivienne.wilson@oriongroup.co.nz.

Yours sincerely



Dayle Parris
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