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Te Tūāpapa Kura Kāinga / Ministry for Housing and Urban Development
Ministry for the Environment / Manatū Mō Te Taiao

By email: gfhg@hud.govt.nz

Going for Housing Growth | Providing for urban development in the new resource management system

1. We refer to the Discussion paper *Going for Housing Growth Providing for urban development in the new resource management system*.
2. By way of background Orion New Zealand Limited (Orion) owns and operates the electricity distribution infrastructure in Central Canterbury, including Ōtautahi Christchurch. Our network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. We deliver electricity to more than 230,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB). Orion and its various predecessors have been providing this essential service to the region for close to 120 years.
3. Central Canterbury is a place of rapid growth and transformation, embracing change and innovation, with Ōtautahi Christchurch at the heart of this diverse and vibrant region. Electricity distribution has always been an essential service that underpins regional, community and economic wellbeing. Our service is vital to the wellbeing and livelihood of the people and businesses who live and operate here. Now, it also has a critical part to play in New Zealand's transition to a low carbon economy.
4. We are very conscious that we face a rapidly changing and massively different energy environment in the decades ahead. The changing landscape facing Orion is primarily driven by three factors – climate change, new technology and increasing demand for electricity. The increasing demand for electricity is driven by the need to both enable decarbonisation at pace, and support population growth.
5. With that background in mind we provide some comments on question 2.
6. We also support the submission of Electricity Networks Aotearoa (ENA).

Question 2 - How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?

7. Like the ENA, Orion supports spatial planning as a tool to guide housing growth. We also note that these tools must provide for electricity distribution networks.
8. For Orion to be able to continue to provide a reliable and resilient supply of electricity we need to be able to plan in advance for increasing demand and to have space for the required infrastructure. In particular, population growth, and subsequently an increased rate of infill housing and subdivision could significantly affect our network as instead of a low voltage feeder supplying 20 standalone homes, a number could be replaced by multiple apartment units, increasing electrical load and triggering network reinforcement.
9. The cost to upgrade infrastructure to service infill housing in older established areas is typically greater on a per-house basis than the cost to connect a new standalone house in a new subdivision. Infill and intensification require more land to be allocated for transformer kiosks and other infrastructure as a direct result of the greater demand for services. In addition, an increase in residential density requires a greater focus on line clearances for both high and lower voltage lines where higher density land use inevitably results in an increase in potential for conflict with lines.
10. Furthermore, changes to our network infrastructure are significant investments and can have long lag times, particularly with ordering equipment from overseas. High international demand for network equipment due to global decarbonisation and geopolitical unrest is exacerbating supply chain issues. This means as much foresight and prior knowledge as possible of significant changes to urban development and transport planning is critical.
11. Taking all of this into account, we refer to paragraphs 49(c) and (d) of the discussion paper where we would expect electricity infrastructure to be engaged.
12. We also note that EDBs, together with local government, will be key entities in delivering decarbonisation. A recent report from the United Kingdom highlights that taking a more locally led, place-based approach may be able to deliver a net zero transition better tailored to local needs, bringing local economic and social benefits.¹ We would like to see formal recognition of these types of plans in the new planning tools. We refer to paragraph 49(a) of the Discussion paper in this regard.

¹ See the Briefing of the Parliamentary Office of Science and Technology on "Local area energy planning: achieving net zero locally" at [Local Area Energy Planning: achieving net zero locally](#)

13. For your information, Canterbury is taking the first steps in developing a strategic energy plan for the region. The Canterbury Mayoral Forum has released the Canterbury Energy Inventory which offers a point-in-time snapshot of Canterbury's energy system, examining electricity generation, transmission, and consumption across sectors. It identifies regional opportunities and challenges, and places Canterbury within the broader national and global shift toward renewable energy. Developed in collaboration with the energy sector, local industries, major energy users, councils, and with input from Ngāi Tahu Holdings, the Inventory marks the first phase of a two-stage initiative. It lays the foundation for a strategic energy action plan to support sustainable development and decarbonisation across the region.
14. Finally, in terms of paragraph 49(c) of the Discussion paper we support expanding the list of matters that must inform spatial planning. Whilst there is no specific reference to hazard and climate change information we would expect this to be included, and in particular public data sources, such as the datasets that NIWA have recently released. (The datasets that NIWA publishes are constantly improving and are invaluable for informed decision-making.)

Conclusion

15. Thank you for the opportunity to make this submission. Please contact Vivienne Wilson, Policy Lead Vivienne.wilson@oriongroup.co.nz if you have any questions or would like any further information.

Yours sincerely

Vivienne Wilson

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