

AURORA ENERGY LIMITED

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2 August 2017

Your ref: LUC 2017-48 & SUB 2017-26

Our ref:

The Chairperson
Hearings Committee – Moray Place Hotel
Dunedin City Council
PO Box 5045
DUNEDIN

Dear Commissioner Noone

RE: SUBMISSION BY AURORA ENERGY LIMITED ON RESOURCE CONSENT LUC 2017-48 & SUB 2017-26 – MORAY PLACE HOTEL – 143 TO 193 MORAY PLACE, DUNEDIN

Aurora Energy Limited ("Aurora") lodged a submission on the above application for resource consent on 10 May 2017 (Submitter 210). It was noted in the submission that Aurora was neutral regarding the development of the proposed site for the activities sought. However, given the close proximity of Aurora's Smith Street Zone Substation (which is located on an adjoining site at 8 Smith Street, Dunedin) Aurora was concerned to ensure appropriate health & safety considerations were taken into account both during construction and operation activities.

I have reviewed the Section 42A report on behalf of Aurora and I am supportive of a number of conditions recommended, which will address, in the main, the concerns raised by Aurora. However, there remain a number of concerns which I consider can be addressed through minor amendments to the recommended conditions. For ease of reference I outline Aurora's original submission points, the proposed conditions to address the concerns and those issues which remain outstanding for Aurora in Table One below.

I am happy to provide any further clarification around the points raised in Table One if it would assist the Hearings Committee.

Yours sincerely

Joanne Dowd

REGULATORY AFFAIRS SPECIALIST

TABLE ONE

AURORA SUBMISSION	PLANNING OFFICERS RECOMMENDATION
1. It is noted that a crane will be required to be sited on the subject site during construction. This raises a potential risk for Aurora's ability to supply electricity if construction works involve movement of material over the substation. Aurora therefore require that no crane movements be permitted over or across the substation. In addition, the New Zealand Electrical Code of Practice for Electrical Safety Distances ("NZECP34") sets out the distance requirements necessary for the installation and maintenance of overhead electric lines and other electrical works previously subject to particular provisions contained in the Electrical Supply Regulations 1984. The distances set out in this Code are mandatory and must be complied with.	Recommended Condition 2 (Clause F) to the Land Use consent relates to <i>Construction Activities</i> and requires consultation with Aurora to ensure that potential adverse effects on any underground cables, earth grid and the foundations of the substation are avoided. In my view this goes some way to address Aurora's concerns. However, in my view additional clauses are required to Condition 2 to fully address Aurora's concerns in regards to health & safety as follows: <u>G) No crane movements shall be permitted over or across the substation located at 8 Smith Street; and</u> <u>H) Any construction activities shall be undertaken in accordance with the safety distance requirements mandated under the New Zealand Electrical Code of Practice for Electrical Safety Distances ("NZECP34")</u> The addition of the above clauses will address Aurora's concerns in this regard.
2. No landscaping is to be planted on the boundary of the substation that would interfere with its normal operation.	I note that while recommended Condition 15 of the Land Use Consent deals with <i>Landscaping</i>, it does not specifically address the concern raised by Aurora in regards to planting on the boundary of the substation. In my view this would be addressed by the addition of the following clause to Condition 15: <u>(vii) No landscaping shall be planted on the boundary of the property at 8 Smith Street which would interfere with the operation of the substation on that site.</u> In my view the addition of the above clause would address Aurora's concerns in this regard.
3. Correspondence with an Aurora engineer is required prior to any excavations occurring on the boundary of the substation site to ensure that underground cables and the earth grid are not damaged, and to ensure that the foundations of the substation are not undermined.	Recommended Condition 2 (Clause F) to the Land Use consent relates to <i>Construction Activities</i> and requires consultation with Aurora to ensure that potential adverse effects on any underground cables, earth grid and the foundations of the substation are avoided. In my view recommended Condition 2 (Clause F) is appropriate and addresses a number of Aurora's concerns and is supported.

AURORA SUBMISSION	PLANNING OFFICERS RECOMMENDATION
4. Correspondence is required with an Aurora engineer should there be any metal work installed in the vicinity of the substation site. This is to ensure earth potential rise hazards are not transferred to the applicant's new development.	Recommended Condition 2 (Clause F) to the Land Use consent relates to <i>Construction Activities</i> and requires consultation with Aurora to be undertaken to address potential issues associated with construction activities on the subject site. In my view recommended Condition 2 (Clause F) is appropriate and addresses a number of Aurora's concerns and is supported.
5. Substations are controlled areas and access is prohibited. To ensure unauthorised entry is prevented, no construction materials are to be stored at the boundary of the substation site which would make the boundary fence scalable.	Aurora has obligations to ensure the health & safety of the public in and around its electricity distribution assets. These obligations are reinforced in Aurora's designation for the Smith Street substation within the Dunedin City District Plan (Designation D247). Condition 3 of the designation requires Aurora "<i>to take all reasonable precautions against unauthorised public access at all times</i>". The storage of materials on the boundary of the substation, which would make the boundary fence scalable would reduce Aurora's ability to comply with its designation obligations. As such, Aurora submitted that no construction materials are to be stored at the boundary of the substation which would make it scalable. <i>I note that recommended Condition 2 (Clause E) requires the management of construction vehicles and stock piling of materials on site to ensure these activities are, <u>wherever practical</u> {my emphasis} located clear of external boundaries.</i> While it may not always be <i>practical</i> to store materials away from external boundaries, it is, in my view, possible to ensure that such stockpiling does not make the substation boundary fence scalable. In my view this needs to be made clear in Condition 2 (Clause E) or the proposed Construction Management Plan for the site.
6. It is noted that only public infrastructure has been addressed in the application. There is no mention of the electricity assets of Aurora on the neighbouring site or the need for connections to the Aurora network. If the development is approved, the Smith Street substation will provide the source of electricity supply to the development. Easements for such services will be required with supply preferably sourced from the substation directly into the applicant's development.	Recommended Condition 3 to the Subdivision Consent requires the registration of easements where these are required. This will address the concerns raised by Aurora and the inclusion of such a condition is supported.