

AURORA ENERGY LIMITED

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29 October 2021

Reference: FTC000030

Environment Protection Agency
Grant Thornton House
Level 10
215 Lambton Quay
Wellington

Dear Sir/Madam

Comments on New Dunedin Hospital – Whakatuputupu Fast Track Application (Aurora Energy Limited)

Please find attached a submission lodged on behalf of Aurora Energy Limited in regard to the above fast track application.

If you require further information or clarification on the submission please contact me either directly by phone (+64 (27) 222 2169) or email alec.findlater@auroraenergy.nz

Yours sincerely

A handwritten signature in blue ink, appearing to be "Alec Findlater".

Alec Findlater

General Manager Regulatory and Commercial

Invitation for Comment on New Dunedin Hospital – Whakatuputupu

New Dunedin Hospital – Whakatuputupu is a Referred Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

Application name	New Dunedin Hospital – Whakatuputupu
EPA reference	FTC000030
Applicant/s	Ministry of Health, Minister of Health
Comments due by	Friday 29 October 2021
Accessing the application	The full application and supporting documents can be viewed on the EPA website, which can be accessed here: https://www.epa.govt.nz/fast-track-consenting/referred-projects/new-dunedin-hospital-whakatuputupu/application/

An application has been made by the Ministry of Health and Minister of Health under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the act) for Stage 1 enabling works for the New Dunedin Hospital – Whakatuputupu.

To comment on Stage 1 enabling works consent application, please fill in the details on the attached form and:

- **Email** the form to Dunedinhospitalfasttrack@epa.govt.nz . Please mark in the subject line: “Comments on New Dunedin Hospital – Whakatuputupu Fast Track Application (Your name/organisation) by Friday 29 October 2021; or
- **Post** the form to New Dunedin Hospital – Whakatuputupu Fast Track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the Friday 29 October; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by 29 October 2021. *Please note that due to potential changes in COVID-19 Alert Levels our reception may not be open to the public. We suggest phoning ahead to check.*

Comments must be received by the EPA, on behalf of the New Dunedin Hospital – Whakatuputupu Expert Consenting Panel, no later than Friday 29 October 2021

If your comment is not received by the EPA by Friday 29 October 2021 the Panel is not required to consider your comment (although it may decide to). Under the COVID-19 Recovery (Fast-track Consenting) Act 2020 there is no right to seek a waiver of the time limit.

If you are an iwi authority you may share the consent application with hapū whose rohe is in the project area in the application and choose to include comments from the hapū with any comments you may wish to provide.

Important information

Your personal information will be held by the EPA and used in relation to the Stage 1 enabling works - New Dunedin Hospital – Whakatuputupu consent application process. You have the right to access and correct personal information held by the EPA.

A copy of your comments, including all personal information, will be provided to the Expert Consenting Panel and the applicant.

All comments received on the application will be available on the EPA website.

If you are a corporate entity making comments on this application, your full contact details will be publicly available. For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

Please do not use copyright material without the permission of the copyright holder.

All information held by the EPA is subject to the Official Information Act 1982.

More information on the fast-track consenting process can be found at <https://www.epa.govt.nz/fast-track-consenting/about/>.

Your Comment on the New Dunedin Hospital – Whakatuputupu

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Aurora Energy Limited		
*First name	Alec		
*Last name	Findlater		
Postal address	10 Halsey Street, Dunedin		
*Home phone / Mobile phone	027 222 2169	*Work phone	
*Email (a valid email address enables us to communicate efficiently with you)	alec.findlater@auroraenergy.nz		

2. *We will email you draft conditions of consent for your comment

<input checked="" type="checkbox"/> *	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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3. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages

SUBMISSION ON NEW DUNEDIN HOSPITAL – WHAKATUPUTUPU APPLICATION SUBJECT TO PUBLIC NOTIFICATION OR LIMITED NOTIFICATION BY CONSENT AUTHORITY

Resource Management Act 1991 and the COVID-19 Recovery (Fast-track Consenting) Act 2020

To: Environment Protection Agency
Grant Thornton House
Level 10
215 Lambton Quay
Wellington 6011

From: Aurora Energy Limited
10 Halsey Street
PO Box 1404
DUNEDIN 9054

This is a submission by Aurora Energy Limited ("Aurora Energy") on an application made by the Ministry of Health and Minister of Health for a fast-track Stage One – Enabling Works Resource Consent Application (FTC000030) for the New Dunedin Hospital (NDH), located between Cumberland Street and Castle Street, which seeks consent to:

- Authorise enabling works across the three NDH blocks, including;
 - Excavation and removal of existing building slabs and foundations;
 - Earthworks;
 - Installation of piles; and
 - Trenching for installation of civil services on all sites and within legal roads.

Aurora Energy is a requiring authority that has a designation on the land on which the project is to be undertaken or land that is adjacent to that land. Aurora Energy holds designation D244 under the Dunedin City District Plan for the purpose of "North City Zone Substation – Electricity Purposes".

Aurora Energy is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the application that the submission relates to are: —

Aurora Energy owns and operates electricity distribution network assets in Dunedin, Central Otago and Queenstown Lakes. The assets are used to transport electricity from the national grid, owned by Transpower, to end-use consumers. Aurora Energy's role is to ensure the safety and resilience of the network and deliver a reliable electricity service to over 93,000 homes, farms and businesses throughout the regions served.

In addition to the distribution network, Aurora Energy has the capacity to own and operate high voltage (up to 110kV) transmission lines, and associated structures in future, and may be required to do so as regional electricity demand grows. Aurora Energy is committed to providing its customers in the region with an effective and secure supply of electricity which, in doing so, provides a critical service to customers, as well as a public good to local communities including hospitals, schools, offices and residential dwellings.

Aurora Energy's North City zone substation is located at 408 Cumberland Street, which is legally described as Lot 1 DP 16431 held in Record of Title OT8C/439. The North City zone substation is a strategic asset for Aurora Energy which serves a number of commercial customers in the Central City including the existing hospital. It is also intended that the North City Zone Substation will provide one of the supply points to the proposed new all-electric hospital. The substation site is shown in **Figure 1** below.

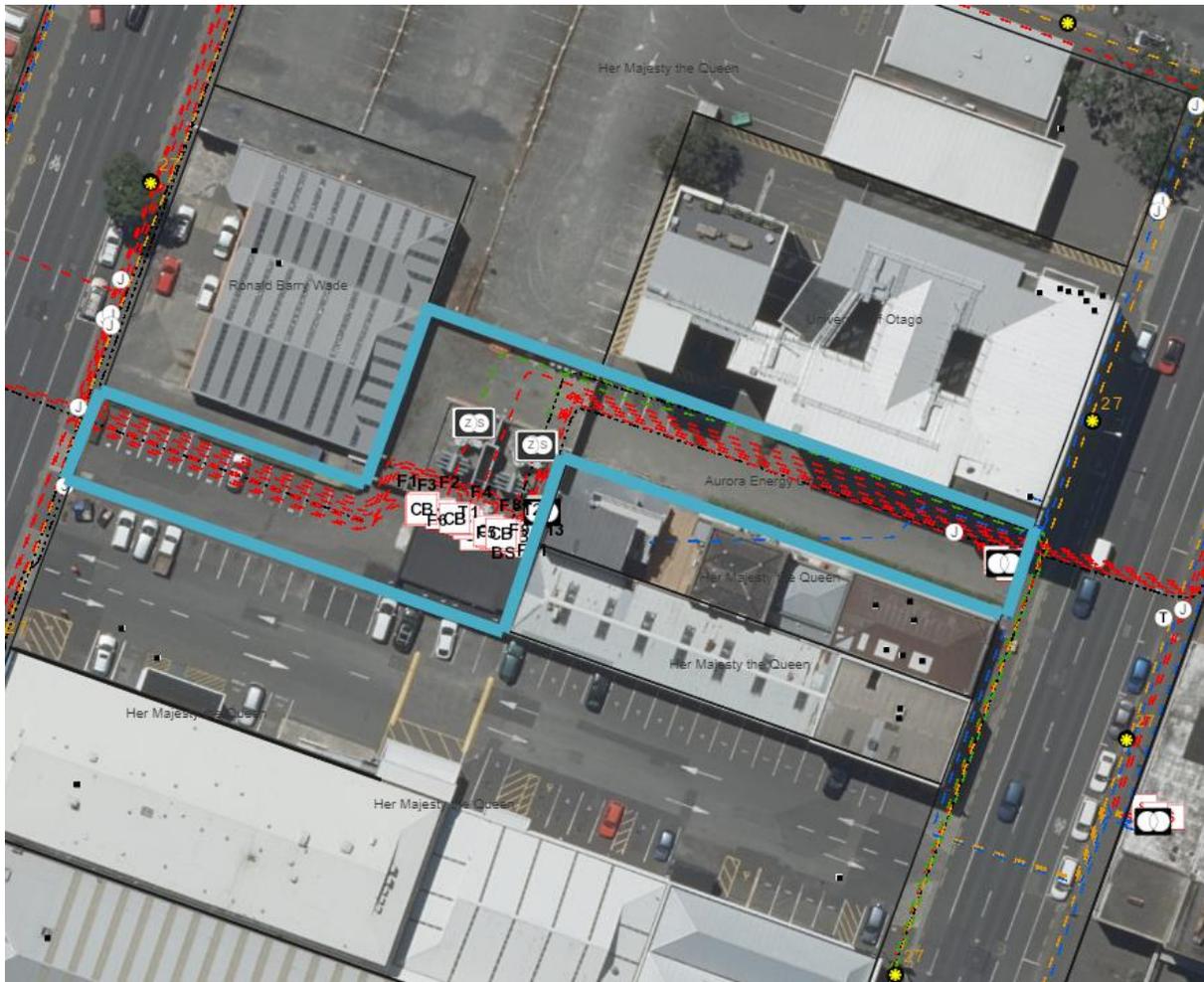


Figure 1: North City Zone Substation Location

The zone substation contains two 33/6.6kV transformers, circuit breakers, underground cables and high voltage switchgear. The substation has been in this location since 1976 and is continually upgraded and maintained as load grows within the Central City. **Figure 2**, below, is a snip from Aurora Energy's geographic information system, which shows the network of existing assets including high voltage cables that surround the application site.

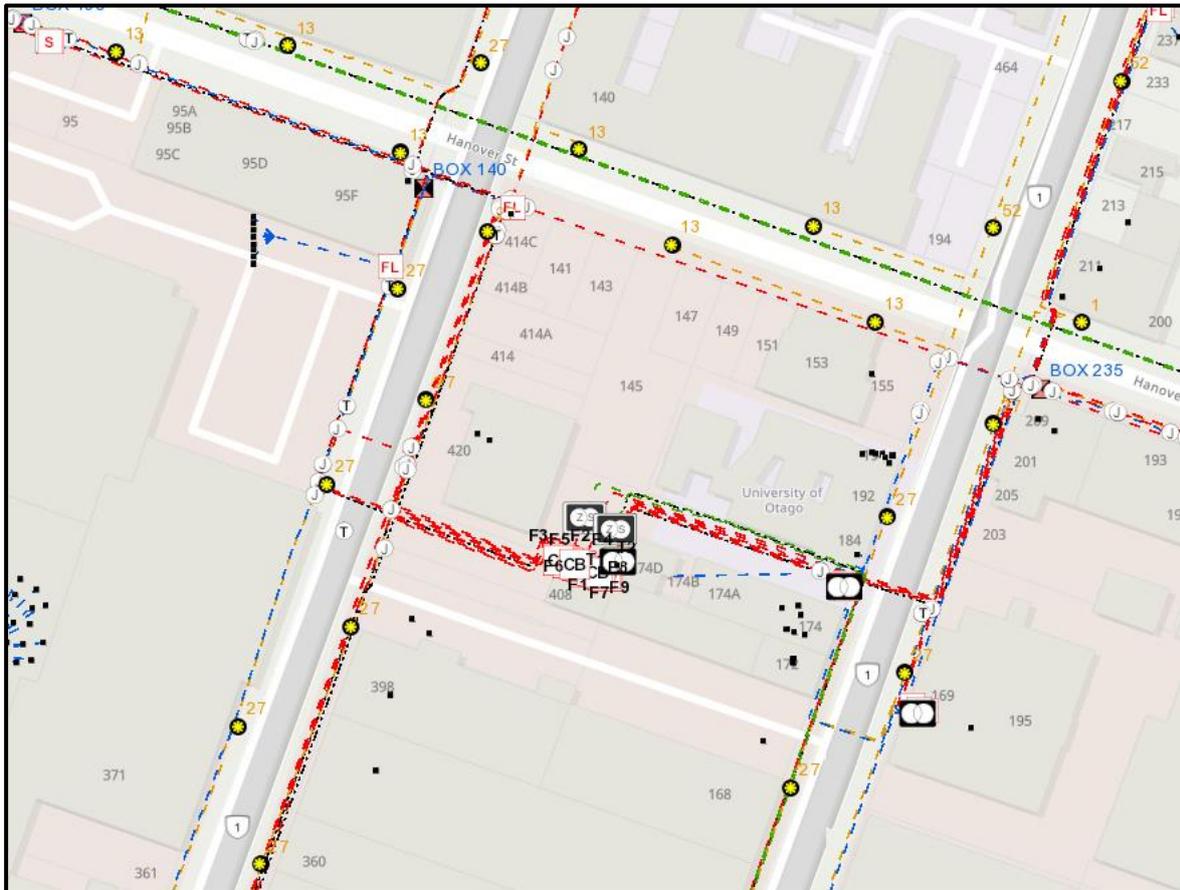


Figure 2: Aurora Energy Network Assets Surrounding the Application Site

Aurora Energy has planned works for the existing cable network over the next planning period, as outlined within Aurora Energy’s Asset Management Plan (2020 – 2030)¹ and Asset Management Plan Update (2021-2031)². Aurora Energy therefore seeks to ensure that the proposed construction and operation of the new hospital does not result in issues associated with reverse sensitivity.

Aurora Energy’s submission is as follows:

Aurora Energy supports the development of the new Dunedin Hospital and is actively working with the project team to plan the electricity network requirements that the all-electric hospital will demand. However, given the close proximity of the North City zone substation on the neighbouring site, and the network of assets shown above, Aurora Energy highlights the following:

- The key concerns relate to appropriate health and safety considerations, around electricity assets during construction activities and the location of the high voltage

¹ <https://www.auroraenergy.co.nz/assets/Files/Disclosures/Asset-Management-Plans/Aurora-Energy-AMP-2020-Final-12-June-2020.pdf>

² <https://www.auroraenergy.co.nz/assets/Files/Disclosures/Asset-Management-Plans/210330-2021-AMP-Update-FINAL.pdf>

North City zone substation. To ensure that safety is not compromised, the following is advised:

- The oil-filled subtransmission cables that supply the North City substation which are located along Castle Street may potentially be affected by the construction of the Inpatient building due to the proposal to drive concrete piles. This has the potential to disturb or damage the cable and its joints, with the resultant risk of:
 - loss of supply or loss of supply security at the North City substation; and
 - oil escaping into the environment.
- Liaison is required with Aurora Energy's engineers to ensure adequate mitigation measures are put in place during the construction phase to address this risk.
- It is envisaged that a crane will be required to be sited on the subject site during construction. This raises a potential risk for Aurora Energy's ability to supply electricity if construction works involve movement of material over the substation. Aurora Energy therefore seeks to ensure 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 Code specifically addresses:
 - in Sections 2 and 3, the safe distance requirements for building works and excavation near overhead electric line support structures. It also covers the construction of buildings and other structures near conductors; and
 - in Section 5, the responsibilities of parties who work or operate mobile plant near overhead electric lines and other electrical works
- The distances set out in the Code are mandatory and must be complied with.
- No landscaping is to be planted on the boundary of the substation that would interfere with its normal operation.
- Correspondence with an Aurora Energy engineer is required prior to any excavations occurring on the boundary of the substation site or in the vicinity of the high voltage oil filled cables located in Cumberland Street to ensure that any existing cables and the earth grid around the substation are not damaged, and to ensure that the foundations of the substation are not undermined.
- Correspondence is required with an Aurora Energy 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 new hospital development site.
- 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.

- Allowing the development of a more sensitive activity near Aurora Energy's substation may result in actual or perceived health, safety and operational risks. Encroachment may also lead to restrictions being placed on the continuation or upgrading of the existing infrastructure due to concerns about health and safety, such as electromagnetic health effects, noise nuisance or amenity concerns. These may, in turn, create an undue restriction on the ability for the assets to be used to meet forecast demand. Aurora Energy therefore seeks assurances from the Ministry of Health ("MOH") that the operation and maintenance of its assets will not be adversely affected by issues associated with reverse sensitivity and seeks a no-complaints covenant offered as a condition of consent.

Aurora seeks the following decision:

If the Environmental Protection Authority is minded to approve the development, then Aurora Energy seeks conditions attached to any approval that will address the issues outlined above.

Aurora does not wish to be heard in support of this submission.

Signature of submitter
(or person authorised to sign
on behalf of submitter)

Date: **28 October 2021**

(A signature is not required if you make your submission by electronic means.)

Address for service of submitter:	Aurora Energy Limited
Telephone:	027 222 2169
Fax/email:	alec.findlater@auroraenergy.nz
Contact person:	Alec Findlater – General Manager Regulatory & Commercial

Thank you for your comments