



27 October 2011

Your ref: email
Our ref:

C. Kowalski
Planning Consultant
QLDC

Dear Charlene

QLDC District Plan: Utility Chapter

On behalf of Aurora Energy Ltd, thank you for the opportunity to respond to your questions relating to the above. Early consultation is important to ensuring that the review of the Utility Chapter is focused.

In terms of your specific questions in order:

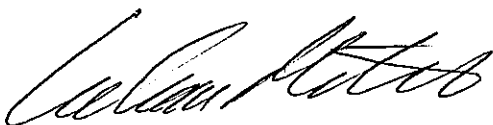
1. Aurora Energy Ltd has an on-going statutory requirement to provide and maintain a sufficient and reliable electrical distribution system within QLDC's district. It is highly likely that upgrading/relocation of overhead lines from Ballantyne Road to West Wanaka and Hawera will be required to meet the growing loads in those areas. Where the existing lines are on private property, they can be upgraded without a resource consent under the Electricity Act 1992. However, where the upgrading involves a new route on private property, then a resource consent will be required unless easements are secured (these require Council approval) and the new route is designated in advance of the work.

Based upon Council's acceptance of the upgrade of the existing line between Cromwell and Ballantyne Road and the upgrade of the line from Ballantyne Road to Cardrona, there is no anticipation of issues in respect to the above. However, the Cardrona upgrade did attract two submissions from property owners along the route. They expressed concern about the additional 33kV lines on the existing poles on their properties. A similar concern may arise in respect to the above. This is an effect issue, not a process issue.

2. Aurora Energy Ltd would much prefer permitted activity status for lines and poles on private property and leave it to Aurora Energy Ltd to secure access for the lines and poles via the Electricity Act 1992. Currently, there is duplication which is considered unhelpful. Aurora Energy Ltd does not proceed with lines on private property unless the route is the most advantageous and agreement has been reached with the property owners concerned.
3. Aurora Energy Ltd has a statutory requirement under the Electricity Act 1992 to maintain certain minimum clearances (heights). It is duplication to insert those requirements into the district plan. Arbitrary height controls for electrical facilities in the district plan are not the most effective nor efficient method to address this environmental effect.

4. Aurora Energy Ltd considers that for electricity poles on private property, the site standards are inappropriate. As noted above, the route selected has to be negotiated with the property owners and agreement reached. Arbitrary site standards may frustrate that agreement.
5. Aurora Energy Ltd is a requiring authority and has only applied for resource consents for lines and poles on private property. Yes, the detail of the route to Cardrona was changed following detailed negotiations with owners. The changes were to the positions of poles to mitigate farming issues.
6. Aurora Energy Ltd has given several notices of requirements that responded to recommendations that had been received from Lakes Environmental Ltd. The changes involved matters of detail such as landscaping, screening, and the like. Subsequent notices of requirements have incorporated the earlier outcomes.
7. Aurora Energy Ltd has a statutory responsibility and utilises the RMA provisions accordingly. It is not a matter of more or less control, but rather an outcome where agreement is reached as quickly and as effectively as possible.
8. Aurora Energy Ltd considers that the notified consent process is an additional statutory hurdle that can and should be avoided by providing for lines and poles on private property to be a permitted activity with few, if any site and zone standards. Such electrical facilities can only be placed on private property by agreement with the property owner and before commencing such negotiations, Aurora Energy Ltd must satisfy itself that the lines and poles on private property is the most effective and efficient outcome. The resource consent process adds little, if anything to that outcome.
9. Aurora Energy Ltd has no other relevant issues in respect to the Utility Chapter of the QLDC District Plan

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adam Fletcher', written in a cursive style.

Adam Fletcher
General Manager, Asset Management