

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 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)	Heritage New Zealand Pouhere Taonga		
*First name	Barbara		
*Last name	Rouse		
Postal address	P O Box 2629 Wellington		
*Home phone / Mobile phone	04 470 8053	*Work phone	027 684 0833
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Submission prepared by:	Fran Davies		
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2. *We will email you draft conditions of consent for your comment

Y	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

Recommendation:

Heritage New Zealand Pouhere Taonga (HNZPT) has carried out a desk top assessment based on the information provided by the applicant and considers that the following matters need to be addressed within the resource consent or designation conditions

Historic Heritage Values

The application identifies 11 historic heritage and character buildings scheduled in the Dunedin City District Plan within the development site and wider area. Four of these buildings are entered as historic places on the New Zealand Heritage List/Rārangī Kōrero ('the List').

Heritage Listed buildings on the subject site and within the wider area:

- Dairy and Machine House Building (on application site) - Category II
- Dunedin Central Fire Station, 153 Castle Street - Category II
- Dunedin Railway Station, 20 Anzac Avenue - Category I
- Allied Press Building, 52 Stuart Street - Category II

The development site contained the former Cadbury Schweppes Hudson Limited Buildings, the majority of which were granted consent to be demolished in November 2020. The Dairy and Machine House building was retained and remains on the site as a Category II historic place on the New Zealand Heritage List/Rārangi Kōrero.

There are a number of works proposed to be carried out adjacent to the Dairy and Machine House building, including:

- slab removal (immediately adjacent to the Allied Press building, Dairy and Machine house building);
- implementing water and oxygen supply tanks and associated foundations; and
- service trenching (approximately 2 metres from the Dairy and Machine House Building).

Construction activities could result in adverse effects on the Dairy and Machine House building, the Allied Press building and the heritage properties within the wider area. HNZPT recommends that appropriate conditions are included to ensure that the historic values are adequately protected. See below.

Management plans

The applicant is proposing that detailed effects be controlled through a Construction Management Plan, which will include a Land Stability Management Plan (LSMP), Noise and Vibration Management Plan (NVMP) and Heritage Temporary Protection Plan (HTPP), to be prepared and implemented for the duration of the works. The HTPP is only proposed to cover the Inpatient building site and will outline how the works will be managed to ensure there are no adverse effects on structural integrity and heritage values of the Dairy and Machine House building, and the Allied Press (Otago Daily Times) Building. The CMP should outline how the works will be managed to ensure there are no adverse effects on structural integrity and heritage values of all Listed heritage structures within the area of influence of vibration effects.

As HNZPT would usually be provided the opportunity to comment regarding the effects of construction works on historic heritage, it requests the opportunity to be consulted on the plans:

The application includes the following advice note:

- c) Prior to submitting the Heritage Temporary Protection Plan (HTPP) required as part of condition 4(e), the plan should be provided to Heritage New Zealand Pouhere Taonga for review and any feedback from them incorporated into the plan before it is submitted to the Dunedin City Council.

The opportunity for HNZPT to review and provide feedback should apply to the entire Construction Management Plan, including the Land Stability Management Plan (LSMP), Noise and Vibration Management Plan (NVMP) and Heritage Temporary Protection Plan (HTPP), as each of these documents have implications for the management of effects on historic heritage. This should be included as a condition of consent rather than an advice note.

The amendments recommended by HNZPT align with the conditions of consent required under resource consent LUC-220-263 for the demolition of the Cadbury Schweppes Hudson Limited Building protected facades.

Cultural heritage

Heritage New Zealand Pouhere Taonga recognises Māori Heritage and association with wahi tupuna is a Taonga tuku iho as expressed in our document Tapuwae. We note that Māori heritage is central to New Zealand's unique identity. It is New Zealand's earliest heritage. The 'footprint' of iwi and hapū life and culture since the first arrivals in Aotearoa some 800 years ago, it is substantial and touches all parts of our country. Māori heritage places give meaning and prestige to the history, traditions, culture and identity of whānau, hapū and iwi. They include sacred and historic sites, ancestral places, tribal landmarks, cultural landscapes, and built heritage features such as marae and church buildings, structures and monuments. It is imbued with mana and spirituality that endure through generation and lives on through relationships of people and place. (<https://www.heritage.org.nz/resources/tapuwae>)

We therefore support the participation of Aukaha and Te Rūnanga o Ngāi Tahu to ensure Māori Heritage is recognised within the urban design and landscaping planning and any impact is mitigated.

Archaeological Sites

As stated in paragraph 34.6 of the application, the area surrounding the application site has a rich history of Māori occupation, and early colonial use and development from the 1860's onwards, and therefore has the potential to contain archaeological remnants of this history. Six archaeological sites (refs I44/894, I44/895, I44/817, I44/922, I44/923, and I44/924) have been recorded over the application site.

Archaeological authorities have been obtained from HNZPT for all works associated with the project on the Inpatient site (Authority 2021/323), Outpatient site (Authority 2020-745) and Logistics Centre site (Authority 2019/481). The application contains an advice note to the effect that the enabling works must be undertaken in accordance with the conditions of these archaeological authorities, which HNZPT supports.

The archaeological authorities, which cover the entirety of the site, require all earthworks (including site clearance) to be monitored by the HNZPT approved archaeologist under section 45 of the Heritage New Zealand Pouhere Taonga Act. The Heritage New Zealand Pouhere Taonga approved archaeologist must be on-site prior to earthworks being undertaken and is required to follow current archaeological practice for the investigation, recording and analysis of any archaeological evidence encountered. Therefore, HNZPT does not consider it necessary for an Accidental Discovery Protocol to be included as a condition of consent.

Proposed condition 18 should be amended to be consistent with the Archaeological Management Plans under the Archaeological Authority, which require all work cease within 10 metres of any kōiwi (human remains) encountered.

Specific amendments to the Proposed Conditions (Attachment 15)

Conditions to be met prior to any site works commencing

4. A Construction Management Plan (CMP) must be submitted to the Dunedin City Council and approved by [insert appropriate position] at least 1 month prior to the enabling works on each site commencing. This plan must include:

...

- e. For the Inpatient building site only, a Heritage Temporary Protection Plan (HTPP), prepared by a suitably qualified and experienced heritage practitioner outlining how the works will be managed to ensure there are no adverse effects on the structural integrity and heritage values of the ~~adjoining~~ Dairy and Machine House building, and the ~~adjoining~~ Allied Press (Otago Daily Times) Building.

- f. The Construction Management Plan will detail how works will be conducted to ensure there are no adverse effects on the structural integrity and heritage values of surrounding heritage buildings entered on the New Zealand Heritage List/Rārangī Kōrero.

Add condition:

Prior to the Construction Management Plan (CMP) required by condition 4 above being submitted to the Dunedin City Council for approval, the CMP must be provided to Heritage New Zealand Pouhere Taonga, who must be given no less than 15 working days to provide comments. Any comments received must be incorporated into the CMP before it is submitted to the Dunedin City Council.

Conditions to be met at commencement of, or during, the enabling works

18. The following archaeological discovery protocols must occur where suspected kōiwi (human remains), taonga, Māori artifacts, or evidence of pre-colonial occupation are encountered during the enabling works:
 - a. If any kōiwi (human remains) are encountered, all work should cease within ~~5~~10 metres of the discovery. The Heritage New Zealand Pouhere Taonga Archaeologist, New Zealand Police and Aukaha must be advised immediately in accordance with Guidelines for Kōiwi Tangata/Human Remains (Archaeological Guideline Series No.8) and no further work in the area may take place until future actions have been agreed by all parties.
 - b. Aukaha shall be informed if any possible taonga or Māori artefacts and evidence of pre-colonial occupation are identified to enable appropriate tikanga to be undertaken, so long as all statutory requirements under the Heritage New Zealand Pouhere Taonga Act 2014 and the Protected Objects Act 1975 are met.

Advice notes

- ~~e. Prior to submitting the Heritage Temporary Protection Plan (HTPP) required as part of condition 4(e), the plan should be provided to Heritage New Zealand Pouhere Taonga for review and any feedback from them incorporated into the plan before it is submitted to the Dunedin City Council.~~

Thank you for your comments