

# 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

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

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](mailto: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**

## Comments on the New Dunedin Hospital – Whakatuputupu

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/>.

# 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.

<b>Organisation name (if relevant)</b>	Office of Hon. James Shaw		
<b>*First name</b>	Maggie		
<b>*Last name</b>	Fellowes		
<b>Postal address</b>			
<b>*Home phone / Mobile phone</b>	0220113750	<b>*Work phone</b>	0220113750
<b>*Email (a valid email address enables us to communicate efficiently with you)</b>	maggie.fellowes@parliament.govt.nz		

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

Yes	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

1. The application relates to the resource consents needed to authorise the in-ground enabling works (Stage 1), and will be followed by a further consent application and notice of requirement for the construction and operation of the New Dunedin Hospital (Stage 2).
2. In keeping with this staged approach to consenting, assessments forming part of the application (including the flood hazard assessment) deal with the environmental effects of the enabling works only.
3. However, as the enabling works are being specifically designed for a particular end use (and the scope of the project in the referral order is to construct and operate a hospital), consideration of the Stage 1 application should allow for a fully informed assessment of the environmental effects of the overall development. This is particularly so for those effects that are central to determining the feasibility of the proposed hospital, including its operation and access both during and after flood hazard events.

## Comments on the New Dunedin Hospital – Whakatuputupu

4. Issues arising from this staged approach, which the Panel may wish to consider further, include:

- a. The referral order for this project requires that the flood hazard assessment include consideration of “*how the hospital would operate during flood events or flooding of the surrounding streets*”<sup>1</sup>. However, the staged approach to seeking consents has meant the flood hazard assessment does not assess the accessibility of the New Dunedin Hospital during flood events for those in need of medical attention, and therefore does not assess the long-term resilience of the land use in this location.

Given the fundamental importance of having a hospital that will remain accessible both during and immediately after natural hazard events (both in the short and long term), consideration should be given to whether the information necessary to enable an assessment of the feasibility of the operation of the hospital in this location, should be included as part of this Stage 1 application. Alternatively, there may be a case for the Stage 1 and 2 applications to be considered concurrently.

- b. It is unclear whether the increase in flood storage volume across the sites resulting from the proposed enabling works (provided primarily through excavation of the Inpatient building site), will still be available during the operational phase of the development. The Flood Hazard Assessment in Attachment 6 states (in respect of the Inpatients earthworks) “...*the excavation will temporarily provide additional flood storage volume at the site*”, which could be interpreted as meaning such flood storage volume will not be available once the building is complete.

If such flood storage capacity will not be available to mitigate the flood risk during the operational phase, then it is unclear what impact this may have on the flood hazard for surrounding areas. Alongside the question of accessibility, this would also raise a question of the extent to which the proposed development will meet the Proposed Dunedin City Second Generation Plan Policy 11.2.1.11 (relating *inter alia* to earthworks exacerbating or transferring risk from natural hazards).



Hon. James Shaw

**Minister of Climate Change**

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<sup>1</sup> Clause 6(d)(ii) of Schedule 15 of the COVID-19 Recovery (Fast-track Consenting) Referred Projects Order 2020