

# 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**

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.

<b>Organisation name (if relevant)</b>	Fire and Emergency New Zealand		
<b>*First name</b>	Alec		
<b>*Last name</b>	Duncan		
<b>Postal address</b>	PO Box 448 Waikato Mail Centre, Hamilton 3240		
<b>*Home phone / Mobile phone</b>		<b>*Work phone</b>	07 960 7259
<b>*Email (a valid email address enables us to communicate efficiently with you)</b>	alec.duncan@beca.com		

## 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

**Please refer to the attached letter.**

**Thank you for your comments**

Environmental Protection Authority  
Private Bag 63002  
Waterloo Quay  
Wellington 6140

29 October 2021

Email: Dunedinhospital.fasttrack@epa.govt.nz

### **Attention: Consenting Panel**

Dear Consenting Panel

### **Fire and Emergency New Zealand – Comments on the Stage 1 Enabling works for the New Dunedin Hospital - Whakatuputupu under the COVID-19 Recovery (Fast-track Consenting) Act 2020**

The Dunedin Central Fire Station is located at 85 Castle Street, Dunedin Central. This is the site of both the Dunedin Central Fire Station and the operational and management hub (Regional Headquarters) for the lower half of the South Island. The building, built in 1930 and occupied in 1931, has a Heritage New Zealand listing as a Category 2 historic place.

The new Dunedin Hospital – Whakatuputupu (the Project), will be constructed across sites located in Cumberland Street, Castle Street and Anzac Avenue, Dunedin. As the Dunedin Central Fire Station is located adjacent to the land on which the Project is to be undertaken, Fire and Emergency New Zealand (Fire and Emergency) have been identified as a landowner and occupier from whom the Panel must seek comment.

Given the proximity of the Dunedin Central Fire Station to the proposed Project, there is potential that the construction phase of the Project will have significant implications for Fire and Emergency, both in terms of its operations and property if actual and potential effects are not adequately addressed prior to construction commencing. These matters of concern are set out below.

### **Construction Effects**

#### Emergency Response and Access

Due to the scale and duration of the Project, there is potential that the construction phase of the Project will have adverse implications on the operations of the Dunedin Central Fire Station, particularly access to existing emergency response corridors and routes.

Following review of the application, it is understood that the proposed construction activities will require temporary road closures and diversions of traffic lanes. These diversions and closures will be managed through a series of Traffic Management Plans (TMPs) (proposed condition 5). These TMPs are to be submitted to Waka Kotahi and Dunedin City Council as road controlling authorities for approval at least 1 month prior to the enabling works on each site commencing. Further, condition 5(e) requires liaison between Waka Kotahi, Dunedin City Council, Otago Regional Council, emergency services, and other stakeholders as required.

Given the scale and duration of the construction phase, it is therefore important that ongoing liaison with Fire and Emergency (as a minimum) is undertaken throughout the Project in order for Fire and Emergency personnel to operate effectively and efficiently in an emergency. There are three communication streams that need careful consideration, as follows:

#### 1. Road closures and Access

Road closures and diversions have the potential to adversely affect emergency response times and this has wider implications on the community and people's lives more generally. It will be paramount that any road closures and diversions throughout the duration of the Project are communicated to Fire and Emergency in a timely and efficient manner. This will enable Fire and Emergency to strategically manage their emergency response routes as required during this time.

Further, current operations see that Fire and Emergency personnel are able to activate a set of mid-block signals on Castle Street to allow fire appliances to depart safely and efficiently. The signals are also used when the fire appliances return so that they can reverse into the station. This is currently the only way the fleet can access the building. It will be important that this system remains operational during the construction phase, and that the building remains unobstructed at all times.

#### 2. Life risk change

It is important that any life risk change as a result of, and throughout the duration of the Project is clearly communicated to Fire and Emergency. This includes temporary relocations (i.e. office workers from surrounding buildings) as well as the need to understand the Project site and associated access points for ease of access in the event of an emergency. Making Fire and Emergency aware of this will cover ongoing response functions and ensure that Fire and Emergency personnel are aware of any changes prior to an emergency taking place.

#### 3. Derelict buildings

Derelict buildings can result in unwanted activities and an increase in fire risk (i.e. arson) where there are vacant buildings in and around the Project site. It is understood that demolition of buildings on the Project site is currently underway. However, should there be any derelict buildings remaining at the time of the Project commencing, Fire and Emergency would therefore require a schedule of these buildings as a means of managing the associated fire risk.

Fire and Emergency therefore consider that there is a need for the development of a foundation document that sets out how the Project team (and their various contractors) intend to communicate with affected parties such as emergency services throughout the Project.

### *Relief sought*

Fire and Emergency therefore seek that a condition of consent is included that requires a comprehensive communications plan to be developed and implemented prior to and for the duration of the construction works. The purpose of the communications plan is to set out how the public and stakeholders (including directly affected and adjacent owners and occupiers of land and affected residents and businesses) will be communicated with throughout construction. The content of the communications plan (as a minimum) is set out in proposed conditions of consent below (or similar wording):

#### *Communications Plan*

*27. The Consent Holder must prepare a Communications Plan for the construction phase of the Project. The purpose of the Communications Plan is to provide a framework to:*

*(a) Inform the community and stakeholders of construction programme and progress,*

- (b) *Set out how the public and stakeholders (including directly affected and adjacent owners and occupiers of land) will be communicated with throughout the Enabling and Construction Works,*
- (c) *Provide people with information about alternative access and travel options during Construction Works,*
- (d) *Provide early information on key Project milestones,*
- (e) *Respond to queries and complaints in accordance with condition 19.*

*The Communications Plan must be updated at least six monthly throughout the construction of the Project.*

28. *As a minimum, the Communications Plan must include:*

- (a) *Details of the Project Liaison Person or other contact person(s) available on site at all times during Enabling and Construction Works.*
- (b) *A list of stakeholders who will be communicated with; this includes:*
  - *Emergency services*
- (c) *Details of communication activities proposed,*
- (d) *Meetings with community and stakeholder representatives,*
- (e) *Details of the Project website, or equivalent virtual information source, for providing information to the public,*
- (f) *Details of the complaint management process as set out in condition 19,*
- (g) *Methods to consult with and to communicate the proposed hours of construction activities outside normal working hours and on weekends and public holidays to affected residents and businesses,*
- (h) *Methods to record concerns raised about hours of construction activities and, where practicable, methods that avoid particular times of day which have been identified as being particularly sensitive for residents and businesses,*
- (i) *Any stakeholder specific communication plans or procedures,*
- (j) *Monitoring and review procedures for the Communications Plan to maintain its currency.*

It is noted that some of the potential construction related effects of the Project are proposed to be managed through management plans and supporting site management and monitoring measures. The communication methods should be cross referenced where necessary to avoid duplication in such instances.

Fire and Emergency consider that a comprehensive communication plan will see that a line of communication is established early in the Project and maintained with the Project team and various contractors that will be working under the Project.

#### Land Settlement

Fire and Emergency note that the application has identified the Dunedin Central Fire Station as a potentially sensitive building to the effects of groundwater drawdown and settlement as a result of de-watering. This poses a significant risk to the building and the ongoing operation of the Dunedin Central Fire Station.

Fire and Emergency acknowledge that modelling has been undertaken and potential settlements have been predicted using conservative model inputs. Further, proposed condition 2 requires a pre-construction condition survey to be undertaken by a certified structural engineer for land, buildings, and surface

infrastructure to establish baseline conditions where de-watering on the Inpatient site is likely to result in a predicted differential ground settlement exceeding 15 millimetres over 10 metres. This includes the Dunedin Central Fire Station building. A Land Stability Management Plan (LSMP) will then be prepared by a suitably qualified experienced practitioner that outlines how earthworks and de-watering of the site will be conducted in a way that maintains the stability and structural integrity of land, buildings, and infrastructure beyond the site.

It is critical for the Consenting Panel as well as the Project team to understand that the Dunedin Central Fire Station is both the main operational and Regional Headquarters for the lower half of the South Island. Due to the significance of the Dunedin Central Fire Station from an emergency response perspective for the region, Fire and Emergency do not have the ability to re-locate or re-direct services in the event that settlement effects result in the need for Fire and Emergency to vacate the premises, or that a facility within the station becomes unusable due to settlement effects. Should this occur, this would result in significant operational risks to Fire and Emergency and will significantly impact on Fire and Emergency's ability to operate in the event of an emergency. It is simply not an option for Fire and Emergency to temporarily vacate the premises or provide suitable emergency service response from elsewhere within the city. Fire and Emergency's ability to operate will ultimately affect service delivery to the community and therefore their ability to provide for the health, safety and wellbeing of people.

Further, significant concerns relate to the health and safety of onsite personnel during construction. Fire and Emergency are relying on the proposed monitoring conditions to ensure that the health and safety of onsite personnel will be upheld at all times.

It is therefore paramount that the Consenting Panel are satisfied that the monitoring requirements for sensitive buildings as set out in condition 4(a) are adequate and will ensure that the structure integrity of the Dunedin Central Fire Station building will not be compromised as a result of de-watering and ground disturbance.

#### *Relief sought*

Fire and Emergency support the imposition of conditions 2 and 4 as proposed by the applicant.

#### Noise and Vibration

Fire and Emergency are concerned that the proposed piling / civil works required during the construction phase could result in damage to the Dunedin Central Fire Station building (which is already sensitive given its age) resulting in an unsafe building for continued occupation if appropriate controls are not in place.

Paragraph 24.124 of the resource consent application specifies that vibration at the Dunedin Central Fire Station building are expected above or close to the 3 mm/s recommended for historic buildings in DIN4150-3:2016.

Further, paragraph 24.113 of the resource consent application states that there will be periods where noise levels may exceed permitted levels from piling on the Outpatient site. Piling noise at this level is only expected over a 3-week period, with lower levels at other times.

Fire and Emergency note that proposed Condition 3 requires that a pre-construction condition survey must be undertaken by a certified structural engineer for buildings where the enabling works are likely to result in an exceedance of the guideline vibration limits set out in *DIN 4150-3:2016 Vibration in Buildings – Part 3: Effects on Structures*. Fire and Emergency consider that the pre-construction condition survey must include the Dunedin Central Fire Station.

A Noise and Vibration Management Plan (NVMP) must then be prepared by a suitably qualified experienced practitioner that addresses the requirements of Annex E of NZS6803:1999 "Acoustics – Construction Noise" and DIN 4150-3:2016 "Vibration in buildings – Part 3: Effects on structures" and is to outline how noise and

vibration will be managed to ensure effects received at surrounding sites are minimised as far as practicable. The NVMP is also to include specific mitigation measures for the management of noise and vibration received at the Dunedin Central Fire Station.

As with the potential settlement effects and associated consequences should exceedances occur, it will be paramount that the Consenting Panel are satisfied that procedures for vibration monitoring, and survey monitoring of vibration induced structural and cosmetic damage are adequate throughout the Project. The Consenting Panel as well as Project team also need to be aware that, should vibration trigger levels be exceeded or induced structural and cosmetic damage is detected in the building, immediate corrective measures will need to be implemented and remedies agreed with Fire and Emergency.

#### *Relief sought*

Fire and Emergency support the imposition of condition 3 as proposed by the applicant.

It is also sought that pre-notification and open communication occurs prior to the higher noise generating activities proceeding in order for Fire and Emergency to mitigate noise effects on its operations as far as possible.

### **Operational Effects**

#### Emergency Response and Access

Liaison with Fire and Emergency should also be undertaken in relation to any proposed upgrades to the transport network (i.e. streetscaping, pedestrian and cycling paths and speed control measures) undertaken by Dunedin City Council or the applicant as part of the Project. Such alterations in and around the Dunedin Central Fire Station need careful consideration in terms of unintended consequences to emergency service response times (such as routes needing to change) and risks to the greater community generally if response times are at risk.

#### *Relief sought*

An advice note on the land use consent application is sought advising the applicant to engage with Fire and Emergency for any works in the transport corridor that has the potential to have implications for emergency access and maneuvering, response times as well as safety issues.

Fire and Emergency's principal contact for the communications associated with the Project is Stephen Hill. Contact details for Stephen Hill are as follows:

**Stephen Hill**

**Property Project Manager and Team Leader**

**Te Ihu and Te Kei Regions (South Island)**

**027 2215142**

**[stephen.hill@fireandemergency.nz](mailto:stephen.hill@fireandemergency.nz)**

Should you wish to discuss the above further, please get in touch.

Yours sincerely



**Alec Duncan**

Planner

on behalf of

**Beca Limited**

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