

Submission Form 16 to the Otago Regional Council on consent applications

This is a Submission on (a) limited notified/publicly notified resource consent application/s pursuant to the Resource Management Act 1991.

Submitter Details:

(please print clearly)

Full Name/s: Arlia O'Sullivan (on behalf of Fire and Emergency New Zealand)

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Private:

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I/ we wish to **SUPPORT / OPPOSE** / submit a **NEUTRAL** submission on (circle one) the application of:

Applicant's Name: Fire and Emergency New Zealand

And/or Organisation:

Application Number: RM24.184

Location:

Purpose:

The specific parts of the application/s that my submission relates to are: *(Give details)*

Please refer to PDF submission

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).*

Please refer to PDF submission

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

Please refer to PDF submission

I/we:

- ☐ Wish to be heard in support of our/my submission
☐ Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes
☐ No

I, **am/am not** (choose one) a trade competitor* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

**If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, **am/am not** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
b) does not relate to trade competition or the effects of trade competition.

I, **do/do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/do not** request* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have/have not** served a copy of my submission on the applicant.



Signature/s of submitter/s

(or person authorised to sign on behalf of submitter/s)

1/05/2025

(Date)

Notes to the submitter

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public, including publication on the Council website. Your submission will only be used for the purpose of the notified resource consent process

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

Otago Regional Council, Private Bag 1954, Dunedin, 9054
or by email to submissions@orc.govt.nz

Form 13

Submission on application concerning resource consent that is subject to public notification by consent authorities

Section 95A Resource Management Act 1991

To: Dunedin City Council, Waitaki District Council and Otago Regional Council

Name of submitter: Fire and Emergency New Zealand

This submission is on resource consent applications by Oceana Gold (New Zealand) Limited to Dunedin City Council (**DCC**) (LUC-2024-126), Waitaki District Council (**WDC**) (201.2024.2373) and Otago Regional Council (**ORC**) (RM24.184) for 34 new or replacement resource consents and s127 variations to 20 existing consents to authorise activities associated with the site wide expansion of mining activities at 'The Macraes Gold Mine', Golden Point Road, Macraes.

Fire and Emergency New Zealand (**Fire and Emergency**) is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (**RMA**).

Fire and Emergency are neutral to this resource consent application, subject to the relief sought in this submission.

The specific parts of the application that Fire and Emergency's submission relates to are:

- The provision of emergency access (including hardstands) in accordance with the Designers' guide to firefighting operations: Emergency vehicle access (F5-02-GD).
- Firefighting water supply and the conditions on fire prevention and how these are implemented.

Fire and Emergency's submission is:

Firefighting water supply

In achieving the sustainable management of natural and physical resources under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.

The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency monitors development occurring under the RMA to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

In order for Fire and Emergency to achieve their principal objective which includes reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property land, and the environment, Fire and Emergency requires adequate water supply be available for firefighting activities; and adequate access for developments to ensure that Fire and Emergency can respond to emergencies.

The provision for adequate water supply is therefore critical. It is important to Fire and Emergency that any new or change in land use has access to adequate water supply (whether reticulated or non-reticulated). This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA.

The application states that to mitigate / manage the potential for accidental fire, fire avoidance protocol and a rapid response to any suspected fires will be in place. Specific measures are not specified however, recommended monitoring / future actions include 'maintaining Macraes Gold Operation emergency response capability' and 'a condition regarding fire prevention'. How these will be implemented, and the condition of consent is not included in the application documents and given the scale of this activity, this presents a risk to Fire and Emergency, should appropriate fire risk mitigation / management measures not be included as part of any decision.

Water from the Macraes Mine Water Management System (MWMS) may be used to support ancillary mining activities including fire suppression. It will also be important that the appropriate hardstands are provided, based on the unspecified firefighting water supply source.

Emergency vehicle access

In terms of access, the condition changes are primarily relating to public access and roading in the vicinity of the Coronation Mining Area. Each existing land use consent for Coronation Mining Area includes different public access and roading conditions.

The Macraes Phase 4 (MP4) project has the potential to generate effects upon the operation of the road network given the realignment of a small section of Golden Bar Road from the intersection of the Macraes-Dunback Road. This will remove a section of Golden Bar Road approximately 730m in length and replace it with a road section approximately 160m shorter, with an intersection at Macraes Road. The proposed realignment of this section of Golden Bar Road will not restrict emergency access between Macraes Road and Golden Bar Road to the south, and the changes are likely to have a negligible impact upon travel times in this area.

The application indicates that the geometry of the new road alignment will comply with current Austroroads standards and Waka Kotahi NZTA standards and requirements. These standards provide guidelines for road design, including carriageway widths, which vary based on road classification. While it could be reasonably anticipated that all roads would be constructed to accommodate a fire appliance due to the nature of the activity, there is minimal information provided in relation to the internal roads including dimensions, gradients, curvature which presents a risk to Fire and Emergency operations.

In the absence of specific details on the internal roads, Fire and Emergency request that changes to the roads/internal roads have a minimum carriageway width of 4m, a gradient not steeper than 1:6, and a curvature as outlined in the Designers' guide to firefighting operations – Emergency vehicle access (F5-02 GD).

Future implications

OceanaGold states in its application that it intends to provide the consent authorities with a suite of proposed conditions prior to the applications being heard. These may cover fire risk management and be of interest to Fire and Emergency.

Fire and Emergency seek the following decision from the consent authority:

- Fire and Emergency request that changes to the roads/internal roads have a minimum carriageway width of 4m, a gradient not steeper than 1:6, and a curvature as outlined in the Designers' guide to firefighting operations – Emergency vehicle access (F5-02 GD).
(<https://www.fireandemergency.nz/assets/Documents/Business-and-Landlords/Building-and-designing-for-fire-safety/F5-02-GD-FFO-emergency-vehicle-access.pdf>)
- Fire and Emergency request that, should consent be granted, that fire prevention conditions are included as conditions of consent.
- Fire and Emergency request that they are provided with a full suite of conditions prior to the applications being heard.

Fire and Emergency wish to be heard in support of its submission. If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at the hearing.

Fire and Emergency do not request, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.



Signature of person authorised to sign on behalf of
Fire and Emergency New Zealand

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