

22 September 2023

Via email: michele.lindsay@fireandemergency.nz

PRE-CONSULTATION FEEDBACK TO FIRE AND EMERGENCY NEW ZEALAND ON OTAGO DISTRICT FIRE PLAN, TE KEI (2023 – 2024)

Queenstown Lakes District Council (QLDC) thanks Fire and Emergency Management New Zealand (FENZ) for the opportunity to present pre-consultation feedback on the Fire Plan for Otago, Te Kei 2023 – 2024 (the Plan).

The duty of managing natural hazard risk (including from wildfire) is spread across many agencies. Given the current absence of national direction¹ setting out the roles and responsibilities of agencies, it is critical that inter-agency frameworks are robustly developed early in the plan making process. Pre-consultation feedback on the FENZ Plan is one such opportunity to achieve a joined-up approach.

QLDC considers that clear direction is needed in the Plan to assess fire risk within Otago. The Plan highlights the need to move beyond an understanding of fire hazard alone, and transition towards a risk management approach. This risk management approach requires an evaluation of the likelihood of the hazard and its associated consequences. The Plan sets an intent to understand relevant localised conditions that contribute to fire risk including likelihood and consequences.

While this strategic risk management approach is supported, QLDC does not consider that the Plan follows through effectively with this commitment. QLDC's feedback is primarily concerned with the lack of clarity over the risk assessment methodology, gaps in the stakeholder schedules (Appendix 1) and inconsistent selection of zone information attributes within the Central Zone and Lakes Zones (Appendix 2) for areas within QLDC boundaries. In addition, QLDC is concerned with the Plan's level of detail with regard to the timeframes for the completion of fire risk assessments and their spatial representation as well as lack of clear references to the update of tactical plans to support a coordinated wildfire response. QLDC's feedback requests that FENZ takes the time to consider how the Plan could better implement a risk management approach.

QLDC requests that FENZ engage more directly and collaboratively with Otago Regional Council and relevant Territorial Authorities in amending the Plan to understand how a risk management approach could be incorporated more effectively into the Plan and its associated outputs. Relevant authorities have considerable experience in applying a risk management approach under the Resource Management Act 1991, and this experience could benefit the development of the Plan.

QLDC is excited to be working collaboratively with Spark New Zealand and Attentis Technology trial cutting edge technology to monitor conditions within two of our District's recreation reserves - Ben Lomond in Queenstown and

¹ It is noted that a [proposed](#) National Policy Statement for Natural Hazard Decision Making was released on 18 September 2023 by the Ministry for the Environment for consultation.

Mount Iron in Wānaka. The technology, if adopted, will be used to inform wider work underway to understand and manage the risk of wildfire to and from reserves across the District. Work to install the units will start in late September with the network expected to be up and running ahead of the 2023-2024 summer season. Data from the trial could be used to help implement the Plan.

It is understood that QLDC's submission on the Fire Plan for Otago, Te Kei 2021-2024 is still considered relevant to the current process, and that the opportunity exists to incorporate points raised from this previous submission. As such, QLDC considers it appropriate to re-submit our 2021 submission to provide a framework for further discussion and collaboration on the next steps of the review. QLDC would welcome further discussion on the contents of this feedback.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tony Avery', is enclosed in a thin black rectangular border. The signature is stylized and cursive.

Tony Avery
Chief Executive (acting)

