

Waikato District Council  
Ngaruawahia office  
15 Galileo Street  
Ngaruawahia 3742

19 March 2020

**Attention: Sandra Kelly**

Dear Sandra

**Fire and Emergency New Zealand – Letter to be tabled at Hearing 13: Hampton Downs**

Fire and Emergency New Zealand (Fire and Emergency) has lodged a submission on the Proposed Waikato District Plan (submitter 378) and further submissions (submitter FS1114). Fire and Emergency has opted not to attend Hearing 13 – Hampton Downs scheduled to commence Thursday 9<sup>th</sup> April 2020 and request that in lieu of attendance this letter be tabled for the Hearing Commissioners' consideration.

The Officer's report for Hearing 13 – Hampton Downs of the Proposed Waikato District Plan (PWDP) has been received. Fire and Emergency's response to the Officer's report recommendations on these submission points are set out below.

Section 9: Objectives and Policies

**Submission 378.4 on Policy 9.1.1.3 Management of adverse effects**

Fire and Emergency have sought to retain Policy 9.1.1.3 as it requires the management of adverse traffic safety effects to ensure the safe and efficient operation and functioning of the adjacent transport network and efficient access to surrounding facilities is maintained at all times. This is important to maintain access to properties for emergency vehicles.

The Reporting Officer has accepted Fire and Emergency's submission to the extent that Policy 9.1.1.3 be retained, subject to a minor amendment.

This recommendation is supported by Fire and Emergency.

Section 26: Rules

**Submission 378.53 on Rule 26.2.7 Motor Sport and Event Traffic Management – All Precincts**

Fire and Emergency have sought to retain Rule 26.2.7 as a Traffic Management Plan (TMP) shall be prepared and provision shall be made for emergency service vehicles needing emergency access to any site or dwelling located on, or with access from Hampton Downs Road. The operation of the Hampton Downs Motorsport Park for a motor sport and recreation event is a controlled activity if access provisions are complied with.

It is the Reporting officer's view that traffic management is essential for the Hampton Downs Motor Sport and Recreation Zone due to the numbers of vehicles the activities generate, its proximity to the Waikato Expressway and importance of access being maintained for the users of Hampton Downs Road. The Reporting officer also considers that it is more appropriate and clearer for plan users if the contents of Rule 26.2.7 were moved to the permitted activity Rule 26.1.1.1 as activity-specific conditions. The Reporting officer notes that Rule 26.2.7 C1 as notified requires approval from third parties (i.e. WDC Roding Team and NZTA). The Reporting Officer considers that this could be improved by stating who the relevant road controlling authorities are and that the activity is undertaken in accordance with a TMP that is authorised by these relevant road controlling authorities. In terms of Rule 26.2.7 C2 and C3, it is the Reporting Officers view that these rules are overly complex and not easily monitored or enforced. It is therefore considered

that the requirement for a TMP and listing the controls which need to be included to be sufficient. It is also considered that reference to the Implementation and Monitoring Committee (IMC) can be removed, given the recommendation to delete C3.

The Officer's report accepts in part Fire and Emergency's submission to the extent that some of the contents of Rule 26.2.7 are moved into Rule 26.1.1.1.

Fire and Emergency supports this recommendation and considers that the amendments still appropriately manage the operation of the Hampton Downs Motorsport Park for a motor sport and recreation event as a permitted activity, subject to activity specific provisions being complied with. This includes the requirement for a TMP which requires that emergency access is provided for.

#### **Submission 378.55 on Rule 26.4 Subdivision**

Fire and Emergency have sought amendment to Rule 26.4 requesting that proposed subdivision shall be connected to public reticulated water supply or water supply sufficient for firefighting purposes. The changes sought promotes consistency across all zones in the PWDP. The amendment sought is as follows:

26.4 Subdivision

D1

*x. Every allotment is provided with water supply and complies with the requirements of Chapter 14 Infrastructure and Energy;*

The Reporting officer notes that Fire and Emergency have also made a submission requesting the inclusion of water supply requirements in the Infrastructure Chapter and these will be addressed by the s42A report for Hearing 22 (Infrastructure). The Reporting officer considers that, for consistency throughout the zone chapters, and avoidance of duplication, that it is not necessary to duplicate in Rule 26.4. The Officers report therefore rejects Fire and Emergency's submission and no amendments are recommended under this section.

Fire and Emergency disagrees with the Reporting Officer's recommendation given that the rule as notified currently includes the requirement to comply with Chapter 14 – Infrastructure and Energy for vehicle access and earthworks (see (iii) and (iv):

*(b) Subdivision within Precinct B shall comply with the following:*

- (i) Every allotment, excluding an access allotment or utility allotment, shall have a net site area of at least 225m<sup>2</sup>;*
- (ii) Every allotment with a road boundary, other than an access allotment has a width along the road boundary of at least 15m;*
- (iii) Every allotment is provided with vehicle access to a public road, and the vehicle access complies with the requirements of Chapter 14 Infrastructure and Energy;*
- (iv) Earthworks comply with the requirements of Chapter 14 Infrastructure and Energy*
- (v) Subdivision in Precinct B shall create no more than 20 allotments.*

At this time, Fire and Emergency can have no certainty regarding the future outcomes for Chapter 14 Infrastructure and Energy, as the hearing is later in the year. Given that the PWDP as notified included provisions linking to Chapter 14, Fire and emergency continue to seek the relief sought in the submission.

Fire and Emergency consider that the amendment sought ensures that Rule 26.4 explicitly links to the infrastructure provisions for water supply to ensure requirements are met for all subdivision activities in Precinct B. Fire and Emergency therefore request that the panel reconsider Fire and Emergency's submission.

Should you have any queries or seek clarification on the above, please contact me on the details below.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alec Duncan', written in a cursive style.

**Alec Duncan**  
Planner

on behalf of

**Beca Limited**

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