

Submission on notified Variation 3 to the Proposed Waikato District Plan

Intensification Streamlined Planning Process (ISPP)

To: Waikato District Council

Submission from: Fire and Emergency New Zealand

This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) to Waikato District Council (WDC) on Variation 3 to the Proposed Waikato District Plan.

1.1 Context

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency seek to:

- protect and preserve life
- prevent or limit injury
- prevent or limit damage to property and land, and
- prevent or limit damage to the environment¹.

Fire and Emergency's main functions² are—

- (a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and
- (b) to provide fire prevention, response, and suppression services; and
- (c) to stabilise or render safe incidents that involve hazardous substances; and
- (d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and
- (e) to rescue persons who are trapped as a result of transport accidents or other incidents; and
- (f) to provide urban search and rescue services.

Fire and Emergency also has secondary functions to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform their main functions efficiently and effectively. These secondary functions³ are:

- (a) responding to medical emergencies; and
- (b) responding to maritime incidents; and

¹ Fire and Emergency New Zealand Act 2017 section 10(a)(b)

² Fire and Emergency New Zealand Act 2017 section 11(2)

³ Fire and Emergency New Zealand Act 2017 section 12(3)

- (c) performing rescues, including high angle line rescues, rescues from collapsed buildings, rescues from confined spaces, rescues from unrespirable and explosive atmospheres, swift water rescues, and animal rescues; and
- (d) providing assistance at transport accidents (for example, crash scene cordoning and traffic control); and
- (e) responding to severe weather-related events, natural hazard events, and disasters; and
- (f) responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment; and
- (g) promoting safe handling, labelling, signage, storage, and transportation of hazardous substances; and
- (h) responding to any other situation, if Fire and Emergency has the capability to assist; and
- (i) any other function conferred on Fire and Emergency as an additional function by the Minister in accordance with section 112 of the Crown Entities Act 2004.

With the wider mandate and changing nature of Fire and Emergency response, the volume of incidents that Fire and Emergency responds to has grown, as has the range of incident types.⁴

Fire and Emergency attend on average, 1,467⁵ incidents across Waikato district annually. This includes an average⁶ of:

- 502 fires
- 261 medical emergencies
- 290 vehicle accidents
- 94 rescues and public assists
- 321 'other'⁷ emergencies.

Fire and Emergency also faces broad challenges, such as the increasing frequency and severity of extreme weather events, increasing intensification of urban areas, and competing access to resources such as water and transport infrastructure. These challenges make the environment Fire and Emergency operates in more complex and puts greater demands on Fire and Emergency as an organisation.

Territorial authorities have a role in ensuring that Fire and Emergency, as an emergency service provider, can continue to operate effectively and efficiently in a changing urban environment. This includes consideration and management of the actual and potential implications on emergency services when giving effect to the National Policy Statement on Urban Development 2020 (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Act 2021 (Enabling Act).

Fire and Emergency note that Policy 1 of the NPS-UD seeks planning decisions that contribute to well-functioning urban environments, which includes urban environments that, as a minimum, have good accessibility and are resilient to the likely current and future effects of climate change.

⁴ There is an increasing need to respond to a wide range of non-fire emergencies, where Fire and Emergency often coordinate with and assist other emergency services. These include responding to motor vehicle accidents, medical call-outs, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea. In 2016/17, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined. (Source: NZ Fire Service Annual Report 2016/17)

⁵ Average 2017-2021

⁶ Average 2017-2021. Fire and Emergency note the impact of COVID-19 on the number of incidents over the 2020/2021 period. In some urban environments, Fire and Emergency observed a reduction in fires and traffic accidents over this period. It is suspected this may have been due to people being home more during the pandemic and perhaps making them more vigilant around fires and reduction of unwanted fire, and fewer people in the public domain thereby reducing the likelihood of unwanted fires at beaches and parks.

⁷ 'Other' emergencies include HAZMAT, heat, pressure and electrical call outs, false alarms and other miscellaneous emergencies.

This submission seeks to enable Fire and Emergency to carry out its requirements under the Fire and Emergency New Zealand Act 2017 more effectively in the protection of people, property and the environment in the event of an emergency.

This submission addresses matters relating to activities required to be undertaken to enable an effective emergency response and to provide for the health and safety of people and communities in Waikato district. Issues of particular interest and relevance to Fire and Emergency broadly include:

- ensuring emergency service appliances and Fire and Emergency personnel can adequately access both built and natural environments across the district in the event of an emergency,
- ensuring new development, including infill development, is adequately serviced by firefighting water supply, and
- maintaining and developing Fire and Emergency's property estate (e.g. fire stations) in strategic locations and at appropriate times to enable Fire and Emergency to continue to meet the demands and expectations of communities as they grow and change.

1.2 Emergency services access

Fire and Emergency requires adequate access to new developments, associated structures and the natural environment to ensure that they can respond in emergencies. This includes access in the event of fire, natural hazard, hazardous substances, medical or a rescue or assist.

Within the urban environment, the NPS-UD encourages higher residential densities, more varied housing typologies such as larger multi-unit development as well as a more compact urban form generally. Intensification and infill housing in the district are already challenging traditional access to properties for fire and other emergencies. This includes both vehicle access to the source as well as physical access by Fire and Emergency personnel to perform rescues and duties, where obstructions and site layout inhibit the use of lifesaving appliances such as ladders, hoses and stretchers.

The changes consequential to the NPS-UD and the Enabling Act will create new challenges for emergency services. Fire and Emergency consider it is vital for the health, safety and wellbeing of communities that the needs of emergency services are taken into account as new urban development is being planned. It is also important that future development areas are designed to be well-functioning and resilient to ensure that communities are able to evacuate in the event of an emergency. If emergency response cannot access people in the event of an emergency, this will not enable and provide for well-functioning and resilient communities and will not achieve Policy 1 of the NPS-UD.

Some of the implications of these aspects are set out in the following sections.

1.2.1 Pedestrian only developments

Fire and Emergency note that as a result of the NPS-UD, the requirement for onsite parking in all residential developments has been removed, introducing the potential for developments to provide pedestrian only access on-site.

Fire and Emergency acknowledge that the New Zealand Building Code (NZBC) C5 specifies access and safety requirements for firefighting operations, where certain buildings must be designed and constructed so that there is a low probability of firefighters or other emergency services personnel being delayed in or impeded from assisting in rescue operations and performing firefighting operations. Buildings must also be designed and constructed so that there is a low probability of illness or injury to firefighters or other emergency services personnel during rescue and firefighting operations.

Of particular note, a performance requirement of C5 is that buildings must be provided with access for fire service vehicles to a hard-standing from which there is an unobstructed path to the building within 20m of the firefighter access into the building and the inlets to automatic fire sprinkler systems or fire hydrant systems,

where these are installed (among other requirements). These performance requirements however do not apply to detached dwellings, within household units in multi-unit dwellings, or to outbuildings and ancillary buildings, therefore there is a significant regulatory gap in the NZBC. Consequently, Fire and Emergency vehicular access requirements and firefighter access is not provided for within many types of developments of which WDC are likely to expect.

While it is unclear how WDC intend to manage such developments that intend to be pedestrian only, Fire and Emergency are concerned that where pedestrian only access developments are sought, these will not be adequate for responders to efficiently access properties in event of a fire or emergency or to use tools and equipment effectively if required. This has the potential to significantly increase the risk to life and property.

Fire and Emergency consider that the Resource Management Act 1991 (RMA) needs to address this matter up front in order to manage the use, development and protection of natural and physical resources which enables people and communities to provide for their social, economic, and cultural well-being, and for their health and safety in accordance with Section 5 of the RMA.

To support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to pedestrian only access developments across Waikato district (should such developments be provided for), Fire and Emergency seek:

- pedestrian accessways are designed to be clear and unobstructed,
- pedestrian accessways have a minimum width of:
 - 3m on a straight accessway.
 - 6.2m on a curved or cornered accessway,
 - 4.5m space to position the ladder and perform operational tasks.
- wayfinding for different properties on a development are clear in day and night,
- developments give effect to the guidance provided in Fire and Emergency's 'Designer's Guide' to Firefighting Operations Emergency Vehicle Access' (December 2021) (Firefighting Operations Emergency Vehicle Access Guide)⁸.

Where resource consent is required for sites with no on-site vehicle access, matters of discretion should include consideration of the extent to which emergency service vehicle access is provided for. The design guide should also consider and reflect good practice examples that, where no vehicle access is provided to a lot/site, that an unobstructed path must be provided either, between buildings on the same site or between buildings and the property boundary to provide for sufficient firefighter access to the site/buildings. This can then be assessed on a case-by-case basis and the district plan design guide could assist in the regard.

1.2.2 Emergency vehicle access

Adequate fire appliance access to both the source of a fire (or other emergency) and a firefighting water supply is essential to the efficient operation of Fire and Emergency. The requirements for firefighting access are set out in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008)⁹, are further detailed in Firefighting Operations Emergency Vehicle Access Guide and prescribed in Acceptable Solutions Part 6 of C/AS1 and C/AS2.

These requirements are necessary for Fire and Emergency to be able to operate pumping appliances from a hard standing. Often, this can be done from the public road, and this is how Fire and Emergency prefers to operate where possible. Pumping appliances are vehicles used to pump water for firefighting (refer Appendix A of the Firefighting Operations Emergency Vehicle Access Guide). They carry a relatively small amount of water (1,350–2,000 litres) and have a limited length of hose. Accordingly, Fire and Emergency must have

⁸ The Fire and Emergency Designers Guide to Firefighting Operations for emergency vehicle access provides help to ensure building designs comply with the NZBC C5 and can be found here: <https://www.fireandemergency.nz/assets/Documents/Business-and-Landlords/Building-and-designing-for-fire-safety/F5-02-GD-FFO-emergency-vehicle-access.pdf>

⁹ The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 can be found here: <https://fireandemergency.nz/assets/Documents/Files/N5a-SNZPAS-4509-2008-NZFS-Firefighting-water-supplies-Code-of-practice.pdf>

access to a water supply and must also be able to base operations near the building, so firefighters can reach the fire with water.

There are however a number of limitations and subsequent concerns Fire and Emergency have in relation to the requirements of the NZBC:

- Performance requirements in clauses C5.3 to C5.8 do not apply to detached dwellings, within household units in multi-unit dwellings, or to outbuildings and ancillary buildings and therefore there is a significant shortfall in access requirements for firefighter access to these particular buildings in the urban environment.
- For buildings to which C5 vehicle access requirements apply, Fire and Emergency observe developments that have obtained building consent (either via an 'Acceptable Solution' or alternative solution developed if better suited to the particular building design and use) however the firefighting access provided for does not enable Fire and Emergency to effectively access a site in a fire or other emergency.

Fire and Emergency has strong concerns that even in situations where the NZBC applies, many recent developments are not compliant with the performance criteria of C5 and therefore do not comply with the NZBC (in particular 20m access to the building for firefighting or 75m hose length to the furthest point).

For this reason, WDC need to carefully consider how emergency vehicle access will be provided for within new residential developments to ensure safe and resilient communities.

Given the statutory gap in the NZBC, significant consideration needs to be given to new district plan rules and a related policy framework to require adequate access to buildings including detached residential dwellings by emergency vehicles and personnel (i.e. SH risk group buildings not covered by the NZBC). It is requested that these requirements align with those of the NZBC so as to not be inconsistent.

For all other developments to which C5 applies, Fire and Emergency request that, where not already provided for, the district plan introduce rules that 'duplicate' the appropriate requirements of the Part 6: firefighting of C/AS1 and C/AS2. Fire and Emergency consider that this approach would prevent resource consents being issued that could not be implemented because the layout does not demonstrate compliance with the performance requirements and need to be redesigned to provide sufficient firefighter access. This could mitigate some risks, especially when activities that currently require resource consent move to permitted.

Adequate provision for emergency access will enable Fire and Emergency to:

- Get into the building and to move freely around their vehicles.
- Gain access to rear dwellings on long sites where hose run lengths become an issue.
- Ensure the safety of firefighters and enable firefighters to deal quickly to smaller undeveloped fires before they develop and endanger members of the public and the firefighters who may need to assist them in either rescues and/or firefighting.

1.2.3 Carparking

Fire and Emergency is already encountering new development where emergency vehicle access along the roading corridor has been challenging. Issues with emergency vehicle access in these locations can be caused by narrow roads / laneways, higher density typologies and a lack of off-street parking available resulting in cars parking along both sides of already narrow residential streets. Implications for emergency services include on-road obstructions, meaning emergency vehicles have difficulty or are unable to manoeuvre, as well as an inability to access buildings and locate fire hydrants in an emergency. Inadequate parking lengths along frontages also have been encountered generally from vehicles parking over footpaths in driveways, blocking access.

Fire and Emergency acknowledges that, where no off-street parking is required, there may also be no requirement to provide for vehicular access to a property. In these situations, emergency service staff would need to enter a property on foot and/or remove fences and other structures to provide access. Regardless, there needs to be sufficient clearance to access properties with heavy emergency equipment.

Despite Policy 11 and clause 3.38 of the NPS-UD, consent authorities can continue to consider the wider effects of car parking supply and demand in resource consent applications. This includes where on-site car parking is provided voluntarily, that any such car parking is provided with dimensions that the spaces do not protrude onto footpaths or otherwise create obstructions. Given that section 104(1) requires a consent authority to have regard to 'any actual and potential effects on the environment of allowing [an] activity', an adverse effect of a particular activity could include adverse traffic effects on the local or wider road network.

Section 108AA of the RMA relates to requirements for conditions of resource consents. Section 108AA(1)(b) provides that a condition must not be included in a resource consent for an activity unless the condition is directly connected to one or both of: an adverse effect of the activity on the environment and/or an applicable district or regional rule, or a national environmental standard.

Fire and Emergency request that WDC retain a policy framework that would enable such conditions to be imposed on a case-by-case basis, having regard to the effects of a particular activity. This could include, for example, matters of discretion relating to the safety of pedestrians and cyclists, surrounding car parking supply, and on and off-street amenity effects.

This will see that WDC and the community are still able to consider any positive or adverse effects, and ensure any adverse effects can be avoided, remedied and mitigated. This would likely be most appropriate for large development applications with a significant under-provision of parking for the type and location of the activity. Consideration should also be given to the requirements of a transportation assessment to determine the impact of development of the roading network. It could also be necessary to use a condition of consent to tie a development application to preparing or updating a comprehensive parking management plan.

1.2.4 Reduced setbacks

The minimum building setbacks from boundaries and between buildings in the Medium Density Residential Standards to 1m on side boundaries from buildings on all sides increase the risk of fire spreading and can inhibit Fire and Emergency personnel from getting to the fire source. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.

Clause C3 of the NZBC is relevant here whereby buildings must be designed and constructed so that there is a low probability of fire spread to other property vertically or horizontally across a relevant boundary. Achieving this functional requirement is however limited by the mechanisms by which this is achieved (i.e. Acceptable Solutions) and buildings of which such requirements apply.

It is therefore vital that the NZBC is enforced and complied with to reduce the risk of fire spread in the intensified urban areas. This includes careful consideration of requirements to use non-combustible building materials to slow the vertical and horizontal spread of fire.

Fire and Emergency encourage WDC to consider integrating these considerations into relevant urban design guidelines to align with the NZBC and prompt developments to consider fire risk mitigations early on in design. This should also be included as an advice note with the relevant side and rear boundary setback rules within PPC9.

1.3 Firefighting water supply

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. To achieve this objective Fire and Emergency requires adequate water supply be available for firefighting activities.

It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing and that this water supply has adequate capacity and pressures available to service the future growth. Fire appliances carry a limited amount of water; therefore, it is necessary that adequate water capacity and pressure be available to Fire and Emergency to control or extinguish a fire. In the urban areas of the district, water is sourced from the reticulated water supply network, however where reticulation is not available or limited (i.e. trickle fed), alternative water sources will be required. This may be in the form of dedicated water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

Adequate capacity and pressure for each development can be determined through SNZ PAS 4509:2008¹⁰. SNZ PAS 4509:2008 is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access in order for Fire and Emergency to operate effectively and efficiently in an emergency.

Fire and Emergency note that new development of subdivision in the new medium density zoned areas will be required to comply with existing rule WWS-R10 that applies to all zones. WWS-R10 requires the provision of a water supply system whereby new development or subdivision are required to connect to any available public, reticulated water supply system. Fire and Emergency further note Regional Infrastructure Technical Specifications (RITS) requires the water supply network to comply with SNZ PAS 4509:2008.

Fire and Emergency consider it essential that urban development does not occur out of sequence with the delivery of key strategic infrastructure (network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the water supply network (unless the urban development itself includes necessary upgrades).

To manage the cumulative effects on the water supply network, Fire and Emergency considers that all subsequent subdivision and development should be subject to development standards within the district plan requiring all applicants to demonstrate by way of providing evidence (i.e. hydrant flow testing) that their development can be adequately serviced for firefighting water supply in accordance with the SNZ PAS 4509:2008 across all zones. If this does not become part of the consenting regime, there will likely be development with inadequate firefighting water supply with potentially serious consequences for life and property. Particular consideration should be given to high rise buildings and the network's capacity to maintain pressures.

1.4 Demand on emergency services

Fire and Emergency has a Statement of Performance Expectations¹¹ which sets out targets to delivering timely and effective fire response and suppression services as well as other services¹². Community need for Fire and Emergency services has been increasing, thereby increasing Fire and Emergency's presence on the roads and need for fast and efficient access to incidents across the district.

Urban growth and intensification coupled with the increasing rate of extreme weather events and risk from natural hazards as a result of climate change and other environmental and demographic changes across communities is likely to result in a greater demand on emergency services and consequently can affect response times if not managed.

Fire and Emergency's response time commitments to the government and community are key determinants for the location of new, or expansion of existing fire stations. Fire stations therefore need to be strategically

¹⁰ The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 can be found here: <https://fireandemergency.nz/assets/Documents/Files/N5a-SNZPAS-4509-2008-NZFS-Firefighting-water-supplies-Code-of-practice.pdf>

¹¹ Statement of Performance Expectations 2021/2022 can be found here: <https://www.fireandemergency.nz/assets/Documents/About-FENZ/Key-documents/FENZ-Statement-of-Performance-Expectations-2021-2022.pdf>

¹² Fire and Emergency Act 2017 sections 10-12

located within and throughout communities to maximise their coverage and maintain appropriate response times and efficiently provide for the health and safety of people and communities.

As urban areas develop and intensify, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is critical for the health, safety and wellbeing of people in the community. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA and therefore does not have the ability to designate land for the purposes of fire stations.

Provisions within the rules of the district plan therefore may be the best way to facilitate the development of any new emergency service facilities as the district grows. Ongoing, and more frequent engagement with Fire and Emergency in terms of growth projections and demographic changes will assist Fire and Emergency in understanding where there is a need for new emergency service facilities in the future. This will be particularly important during plan review and plan changes that seek to re-zone large portions of land to facilitate development.

Fire and Emergency seeks the following decision from the local authority:

Appendix A set out the details of Fire and Emergency's submission, including the amendments sought by Fire and Emergency to specific provisions in Variation 3, and the reasons for the amendments.

Fire and Emergency would welcome any questions or further engagement on matters raised in the submission within.

Fire and Emergency may wish to be heard in support of its submission depending upon the proposed amendments recommended to the Variation 3 provisions as notified.

- Fire and Emergency could not gain an advantage in trade competition through this submission.
- Fire and Emergency are directly affected by Variation 3.
- Fire and Emergency may wish to be heard in support of its submission depending upon the proposed amendments recommended to the Variation provisions as notified.

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



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Appendix A

The following table sets out the specific position and any amendments sought by Fire and Emergency. Where specific amendments to provisions of Variation 3 are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Provision	Support / oppose	Submission	Requested amendment
SD – Strategic directions				
1	SD-O14 Well-functioning urban environment	Support	<p>Fire and Emergency support SD-O14 insofar that it requires the provision for a well-functioning urban environment and enables all people and communities to provide for their health and safety, now and into the future.</p> <p>This would include consideration of, and the requirement to provide a water supply sufficient for firefighting and adequate emergency access and egress in the event of an emergency.</p>	Retain as notified.
TRPT – Transportation				
2	Table 12 – Access and road standards	Support	<p>Fire and Emergency support the amendments to Table 12 which include the addition of MRZ1 – Medium density residential zone 1 and MRZ2 – Medium density residential zone to the access and road standards. The minimum seal widths are specifically supported as these minimum requirements align with those set out in F5-02 GD Designers' guide to firefighting operations Emergency vehicle access which will allow fire and emergency vehicles to get through them easily and to allow Fire and Emergency to carry out emergency operations.</p> <p>Fire and Emergency note that TRPT-R1(1)(a)(ii) (Vehicle access for all activities) requires compliance with Table 12 in all zones and appropriate matters are discretion are in place where compliance is not achieved.</p>	Retain as notified.
SUB – Subdivision				
3	SUB-P23 Subdivision in the MRZ2 – Medium density residential zone 2	Support	<p>Fire and Emergency support SUB-P23 insofar that subdivision that supports the development of medium density residential development is provided for except where the proposed subdivision does not comply with the relevant subdivision standards.</p> <p>It is important to Fire and Emergency that subdivision and subsequent medium density development is not enabled where there is insufficient infrastructure capacity, particularly in relation to the water supply and transport network.</p>	Retain as notified.
4	<p>SUB-R31 Subdivision – general</p> <p>MRZ1 – Medium density residential zone 1</p>	Support	<p>Fire and Emergency support the performance standard SUB-R31(1)(a)(ii) that requires proposed vacant lots in the MRZ1 to be able to connect to public-reticulated water supply.</p> <p>Fire and Emergency support the matters of discretion set out in SUB-R31, in particular, (a) Subdivision layout; (g) Vehicle and pedestrian networks and (i) Provision of infrastructure (which by proposed district plan definition includes a water supply distribution system and roads). These matters of discretion should provide Council the ability to impose suitable conditions of consent relating to the water supply infrastructure and to address effects on the transportation network when issuing subdivision consents.</p> <p>To manage the cumulative effects on the water supply network, Fire and Emergency considers that all subdivision and development in MRZ1 should be subject to infrastructure capacity checks as part of the consenting process to confirm whether future development can be adequately serviced for firefighting water supply in accordance with the SNZ PAS 4509:2008 prior to the granting of consent. If this does not become part of the consenting regime, there will likely be development with inadequate firefighting water supply with potentially serious consequences for life and property. It is recognised that Watercare, as the water supply operator and Council (under the water supply bylaw) will have a role here in ensuring new connections are not granted where there is insufficient</p>	Retain as notified.

ID	Provision	Support / oppose	Submission	Requested amendment
			capacity to service a subdivision or development. This approval process should inform the resource consent process or be required to occur prior to applications being made for resource consent.	
5	SUB-R153 Subdivision – general MRZ2 – Medium density residential zone 2	Support	<p>Fire and Emergency support the performance standard SUB-R153(1)(a)(ii) that requires proposed vacant lots in the MRZ2 to be able to connect to public-reticulated water supply.</p> <p>Fire and Emergency support the matters of discretion set out in SUB-R153, in particular, (a) Subdivision layout; (g) Vehicle and pedestrian networks and (i) Provision of infrastructure (which by proposed district plan definition includes a water supply distribution system and roads). These matters of discretion should provide Council the ability to impose suitable conditions of consent relating to the water supply infrastructure and to address effects on the transportation network when issuing subdivision consents.</p> <p>To manage the cumulative effects on the water supply network, Fire and Emergency considers that all subdivision and development in MRZ2 should be subject to infrastructure capacity checks as part of the consenting process to confirm whether future development can be adequately serviced for firefighting water supply in accordance with the SNZ PAS 4509:2008. If this does not become part of the consenting regime, there will likely be development with inadequate firefighting water supply with potentially serious consequences for life and property. It is recognised that Watercare, as the water supply operator and Council (under the water supply bylaw) will have a role here in ensuring new connections are not granted where there is insufficient capacity to service a subdivision or development. This approval process should inform the resource consent process or be required to occur prior to applications being made for resource consent.</p>	Retain as notified.
6	SUB-R154 Subdivision – residential MRZ2 – Medium density residential zone 2	Support in part	Fire and Emergency request an additional matter of control that considers the impacts on the vehicle and pedestrian network. This is consistent with SUB-R31 and will provide Council the ability to impose suitable conditions of consent to address any effects on the transportation network when issuing a controlled activity residential subdivision consent.	Add new matter of control as follows: (f) Vehicle and pedestrian networks.
MRZ2 – Medium density residential zone 2				
7	MRZ2-P3 Housing Design	Support	Fire and Emergency support MRZ2-P3 insofar that it requires housing to be designed to meet the day-to-day needs of residents. This policy would include consideration of, and the requirement to provide an adequate firefighting water supply and adequate emergency access and egress in the event of an emergency.	Retain as notified.
8	MRZ2-S1 Residential unit	Support in part	<p>Fire and Emergency generally support the matters of discretion in MRZ2-S1 that apply to proposals that seek more than three residential units per site in the MDZ2.</p> <p>Fire and Emergency however consider that specific consideration should be given to the build form as it relates to the functionality of the site and the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</p> <p>Fire and Emergency recommend that MRZ2-S1(2)(b) be amended to incorporate this consideration.</p>	<p>Amend matter of discretion:</p> <p>(b) Design, scale and layout of buildings and outdoor living spaces in relation to the planned urban character of the zone, the efficient movement of residents and the provision for the health and safety of residents in meeting their day-to-day needs.</p>
9	MRZ2-S4 Setbacks	Support in part	<p>Fire and Emergency acknowledge that MRZ2-S4 incorporates the density standards required by Part 2 of Schedule 3A of the RMA.</p> <p>As set out in section 1.2.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p>	<p>Add advice note:</p> <p>Advice note:</p> <p>Building setback requirements are further controlled by the Building Code. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building</p>

ID	Provision	Support / oppose	Submission	Requested amendment
			<p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with MRZ2-S4 directing plan users to the requirements of the NZBC.</p> <p>An additional matter of discretion is sought where minimum setback requirements are not met, in order to address the potential adverse effects on the efficient movement of people in a fire or other emergency.</p>	<p><u>consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p> <p>Add new matter of discretion:</p> <p><u>4. The extent to which the non-compliance compromises the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</u></p>
10	MRZ2-S6 Outdoor living space (per unit)	Support in part	<p>Fire and Emergency support MRZ2-S6 insofar that it requires all residential developments in MRZ2 to have an outdoor living space free of buildings, parking spaces, and servicing and manoeuvring areas. While not directly associated, this will go some way in providing efficient emergency service personnel access to buildings.</p> <p>Fire and Emergency acknowledge that firefighting access requirements are managed through the NZBC however consider it important that these controls are brought to the attention of plan users (i.e. developers) in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. The NZBC requirements will have an influence over how a site is designed and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent stage so that Council are able to assess this design to ensure compliance with the RMA.</p> <p>Fire and Emergency therefore request that, as a minimum, an advice note is included with MRZ2-S6 directing plan users to the requirements of the NZBC.</p> <p>An additional matter of discretion is sought where minimum setback requirements are not met, in order to address the potential adverse effects on the efficient movement of people in a fire or other emergency.</p>	<p>Add advice note:</p> <p><u>Advice note:</u></p> <p><u>Access requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p> <p>Add new matter of discretion:</p> <p><u>4. The extent to which the non-compliance compromises the provision for the health and safety of residents in meeting their day-to-day needs.</u></p>