

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Waitomo District Council

Name of submitter: Fire and Emergency New Zealand

- This is a submission by Fire and Emergency New Zealand (Fire and Emergency) on the Proposed Waitomo District Plan (PDP).
- Fire and Emergency could not gain an advantage in trade competition through this submission.
- The specific provisions of the proposal that Fire and Emergency's submission relates are set out in Attachment A.

Fire and Emergency's submission is:

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

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)

- (b) responding to maritime incidents; and
- (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 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. As such, Fire and Emergency has an interest in the PDP to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting and property requirements.

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 lives, property and the surrounding environment. This submission addresses matters relating to activities required to be undertaken to enable effective firefighting training, emergency response and to provide for the health and safety of people and communities in the Waitomo district.

The provisions of the PDP that relate to Fire and Emergency's statutory functions and responsibilities are:

- fire safety and fire prevention,
- firefighting water supply and access to this supply,
- property access for fire appliances,
- subdivision and development including in remote areas,
- noise from emergency services activities,
- the ability to undertake training activities for the firefighters within the district,
- the operation of existing fire stations, and
- the establishment of new fire stations.

There are four existing fire stations in the Waitomo district, as follows:

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)

Fire station	Legal Description	Physical Address	Operative Waitomo District Plan	Proposed Waitomo District Plan
Tainui Mokau Volunteer Fire Brigade	Lot 2 DP 9738	41 North Street, Mokau	Zone: Residential Zone Overlay: Nil Statutory: Classification of a Reserve, to be a Local Purpose (Emergency Services) Reserve. New Zealand Gazette 2016 In 65 Revokes the appointment of the St John Ambulance Association and appoints the Tainui District Fire Party to control and manage the Reserve.	Zone: Settlement Zone Overlay: Coastal Environment Statutory: Classification of a Reserve, to be a Local Purpose (Emergency Services) Reserve. New Zealand Gazette 2016 In 65 Revokes the appointment of the St John Ambulance Association and appoints the Tainui District Fire Party to control and manage the Reserve.
Piopio Volunteer Fire Brigade	Lot 7 DP 11222	8 Ruru Street, Piopio	Zone: Residential Zone Overlay: Nil	Zone: Residential Zone Overlay: Building Platform Suitability Area C (partial)
Te Kuiti Volunteer Fire Brigade	PT ALLT 14 BLK VIII Te Kuiti MAORI TNSP	52 Taupiri Street, Te Kuiti	Zone: Business Zone Overlay: Nil	Zone: Commercial Zone Overlay: Building Platform Suitability Area C (full)
Benneydale Volunteer Fire Brigade	Section 63 Block X Mapara SD	2 School Road, Benneydale	Zone: Residential Zone Overlay: Nil Statutory: Utility Reserve New Zealand Gazette 1984 p 4521	Zone: Settlement Zone Overlay: Nil Statutory: Utility Reserve New Zealand Gazette 1984 p 4521

Fire and Emergency has a Statement of Performance Expectations⁵ which sets out targets to delivering timely and effective fire response and suppression services as well as other services. 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 city.

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 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

⁵ <https://www.fireandemergency.nz/assets/Documents/Files/Statement-of-Performance-Expectations-2022-2023.pdf>

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 as a key stakeholder 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.

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

Appendix A sets out the details of Fire and Emergency's submission, including the amendments sought by Fire and Emergency to specific provisions in the PDP, and the reasons for the amendments. Many of these are in favour of retaining the proposed provisions as currently proposed.

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 a hearing.



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

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Appendix A: Fire and Emergency New Zealand submission on the Proposed Waitomo District Plan

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

ID	Proposed provision	Support / oppose	Submission	Requested relief
PART 1 – INTRODUCTION AND GENERAL				
Definitions				
1	<i>emergency management activities</i>	Support	<p>Fire and Emergency supports the definition for ‘emergency management activities’ as it includes training activities undertaken by a public organisation which includes Fire and Emergency.</p> <p>In order to ensure an efficient and effective emergency response, firefighter training is an essential activity undertaken by Fire and Emergency. Firefighter training may include live fire training and equipment training both on and off site. The Statement of Performance Expectations⁶ confirms a commitment to the Government that all firefighters achieve a certain level of training.</p> <p>Fire and Emergency further supports this activity being provided for across all zones in the district as a permitted activity.</p>	Retain as notified.
2	<i>emergency service facilities</i>	Support	Fire and Emergency supports the provision of a specific definition for emergency service activities which includes fire stations and any ancillary accommodation and storage on a site.	Retain as notified.
3	<i>hazardous substance</i>	Support	Fire and Emergency supports the definition of ‘Hazardous Substance’ being consistent with ‘Hazardous Substances and New Organisms Act 1996’.	Retain as notified.
4	<i>natural hazard</i>	Support	Fire and Emergency supports the definition of natural hazard being consistent with section 2 of the RMA which includes ‘fire’.	Retain as notified.
5	<i>operational need</i>	Support	The ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is paramount for the health, safety and wellbeing of people and the community. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and response times so that they can efficiently and effectively respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies.	Retain as notified.
6	<i>significant hazardous facility</i>	Support	<p>Fire and Emergency supports the definition of ‘significant hazardous facility’, to the extent that it seeks to define, and subsequently manage, the effects of significant hazardous facilities on other land uses. Fire and Emergency specifically support the following:</p> <ol style="list-style-type: none"> 1. The exclusion of ‘<i>the incidental use and storage of hazardous substances in minimal domestic-scale quantities</i>’ from the definition of significant hazardous facility. 2. The inclusion of ‘<i>the storage and/or treatment of hazardous waste (including reuse and recycling facilities) or hazardous substances awaiting reuse, recycling or treatment</i>’ as a ‘significant hazardous facility’. This will provide council the ability to manage facilities that become high risk as a result of 	Retain as notified.

⁶ <https://www.fireandemergency.nz/assets/Documents/Files/Statement-of-Performance-Expectations-2022-2023.pdf>

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			<p>stockpiling materials. Where the economics of the business changes and they cannot process or dispose of materials, this can become a high fire risk and poses a risk to the health and safety of communities.</p> <p>3. The inclusion of 'Any facility deemed a 'Major Hazardous Facility' under the Health and Safety at Work Major Hazardous Facilities Regulations 2016' as a 'Major Hazardous Facility'. Fire and Emergency considers that any activity of this scale should be evaluated by the Council to ensure the activity meets the requirements for amenity values and impact on cultural and environmental values, thus enabling Council to manage adverse effects on adjacent land uses.</p> <p>4. Fire stations and associated firefighting activities involve the use and storage of hazardous substances at quantities that are considered minor. However, there are circumstances where Fire and Emergency needs to temporarily store large quantities of product in an emergency. Based on this definition, it is possible that the PDP may not enable for this and could affect Fire and Emergency's ability to operate as effectively as needed.</p> <p>The 2019 Nelson Fires are a good example of a large emergency response and temporary storage of large quantities of product in an emergency. For a week at the height of that event Fire and Emergency was using seven pallets of fire retardant and foam per day (5600kg). In a major event, Fire and Emergency would try to have several days stock at hand to respond to rapidly changing intensity of the fire. In terms of quantities, this could be up to 15-30,000kg or L of product on site.</p> <p>Fire and Emergency also holds stocks of petrol and diesel by the pallet. This is used to power generators and pumps and for constructing fire breaks. Fire and Emergency brings in resources from across the country for these events; even for smaller events to ensure an effective response. It is therefore important that Fire and Emergency is not restricted by the PDP. It is noted that Fire and Emergency will operate all emergency responses under the Health and Safety at Work Act 2015 and Hazardous Substances and New Organisms Act 1996 regulations. These regulations include storage, secondary containment, handling, packaging, signage, labelling, emergency management etc.</p> <p>Fire and Emergency therefore support 'Emergency management activities' being excluded from the definition of 'significant hazardous facility'.</p>	
7	Structure	Oppose	<p>Fire stations are typically single storied buildings of approximately 8-9m in height and are usually able to comply with the height standards in a district plan. However, as part of Fire and Emergency fire station operational requirements many stations include a multi-purpose tower or pole between 12-15m in height.</p> <p>Fire and Emergency towers are typically either lattice towers that can support a siren, aerials and hose drying or are platform towers that can support all the above plus be used for firefighter training. Similarly, poles can support sirens, aerials and hose drying activities. Examples of these structures are attached as Appendix B.</p> <p>The frequency of towers or poles being required at stations is generally dependent on locational and operational requirements of each station. Some existing fire station sites across the country have aerial and sirens mounted on the roof of the building which is not ideal, and Fire and Emergency are slowly rectifying this with the construction of towers and poles. Ideally all stations would have a tower or structure.</p> <p>Fire and Emergency consider that the inclusion of an exemption from the definition of 'structure' better provides for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations. This would importantly remove the need to comply with height and height in relation to boundary performance standards for towers and poles in all zones. Such an exemption is considered to be justified on the basis that fire stations are a key component of Fire and Emergency's ability to respond to emergencies.</p>	<p>Exclude towers and poles associated with emergency service facilities from the definition of 'structure'.</p> <p>OR</p> <p>Exclude towers and poles associated with emergency service facilities from the height and height in relation to boundary performance standards in each zone.</p>

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			Further, the exemption will apply in relatively few situations only, the effects of the exemption can be largely anticipated, and such effects do not differ from the effects of a number of activities that may be anticipated through the urban and rural environments such as TV aerials on houses, small satellite dishes, and chimneys which are often excluded from definitions such as structures.	
PART 2: DISTRICT WIDE MATTERS				
Transport				
8	Objectives and policy - general	Support	<p>For fire appliances to access an emergency, it is important that the transportation network is designed, constructed and operated in a way that ensures a safe, efficient, effective, integrated, resilient and sustainable transport system.</p> <p>Fire and Emergency recognises the significant advantages of prioritisation of street space for pedestrians and cyclists in urban environments. However, in prioritising street space for pedestrians and cyclists, care must be given to avoid unintended consequences on Fire and Emergency's ability to respond to emergency events. Prior engagement with Fire and Emergency and other emergency service providers is therefore important before such measures are implemented.</p> <p>In some cases, the provision of cycleways on main arterial roads, the narrowing of roads or incorporation of speed controls as part of traffic-calming programmes may inadvertently block or significantly slow down a route required by Fire and Emergency. If an emergency appliance needs to park on a road, this can mean the street/road is blocked to all other traffic including other emergency vehicles that may need to get past. This is not only limited to residential streets, but also more commercial and central city areas.</p> <p>Street furniture, trees and sculptures etc. can also make it difficult for fire appliances to get close to building frontages and consequently fire hydrants in the streets. In the case of larger buildings, the street frontage is often where the fire alarm control panel is located. This component should be considered during the update on any urban design guidelines.</p> <p>Fire and Emergency support a robust policy framework that will see that consideration is given to the operational needs of emergency services in a fire or other emergency.</p>	Retain as notified.
9	<i>TRAN-R1. Vehicle access on to roads other than State Highways</i>	Support in part	<p>Fire and Emergency need to be able to reach buildings with their different vehicles in a fire or other emergency. Buildings must be provided with access that allows appliances to reach a position that makes it practical for firefighters to get into the building and access the inlets to fire sprinkler systems or building fire hydrant systems, where these are installed.</p> <p>Pumping appliances are vehicles used to pump water for firefighting. They carry a relatively small amount of water (1,350–2,000 litres) and a limited length of hose (approximately 75m). This is why Fire and Emergency must have access to a water supply and must also be able to base their operations near the building, so firefighters can reach the fire with water. Often, this can be done from the public road, and this is how Fire and Emergency prefer to operate where possible. However, for large sites, sites with multiple buildings or sites with large setbacks that are located remotely from the street, Fire and Emergency vehicles may have to operate from within a site which is less favoured.</p> <p>Carriageways therefore need to be wide enough to allow Fire and Emergency vehicles to get through them easily and to allow Fire and Emergency personnel to carry out emergency operations. This means that when a Fire and Emergency vehicle is parked, Fire and Emergency personnel can easily open and exit the doors, access equipment from its compartments and safely connect the hose to the pump.</p>	<p>Include the following amendments:</p> <p>5. <i>The vehicle access point complies with the dimensions required for fire appliances for developments in SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where a driveway length exceeds 75m or a fire appliance is not able to reach the source of a firefighting water supply from a public road.</i></p>

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			<p>To accommodate a Fire and Emergency vehicle, carriageways should have a minimum width of 4m. This can be reduced to a minimum width of 3.5m at entrances, provided tight turns are not required. Surface and gradients should also support the operational requirements of Fire and Emergency appliances.</p> <p>Fire and Emergency supports TRAN-R1 to the extent that it requires vehicle accesses on to roads other than state highways in all zones (other than Te Kūiti CBD precinct PREC5) to comply with all of the performance standards in TRAN - Table 2 and the vehicle access dimensions required for fire appliances for developments in accordance with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where a driveway length exceeds 75m or a fire appliance is not able to reach the source of a firefighting water supply from a public road. Fire and Emergency note that during engagement with Council on the draft plan, Fire and Emergency indicated that while 75m was generally accepted, a maximum driveway length of 50m would be more practicable in order to give Fire and Emergency personnel leeway with the hose run when manoeuvring around buildings and obstacles on a site. This has not been adopted in the PDP and Fire and Emergency request that Council consider this and provide a response in relation to this decision in their reporting.</p> <p>Notwithstanding the above, this rule requires consideration of where the buildings are located as well as the firefighting water supply which will require developers to consider how access for firefighting vehicles will be provided for any subdivision or development. This is supported by Fire and Emergency.</p> <p>Where compliance cannot be achieved with the permitted activity standards, Fire and Emergency further support the matter of discretion (c) that awards Council the discretion to consider "The ability to provide an adequate and reliable firefighting water supply".</p> <p>One minor amendment is sought to TRAN-R1(5) to enhance readability.</p>	
10	<i>TRAN-R8. Vehicle access on to State Highways</i>	Support in part	<p>Fire and Emergency supports TRAN-R8 to the extent that the restricted discretionary activity rule requires "The vehicle access point complies with the dimensions required for fire appliances for developments in SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where a driveway length exceeds 75m or a fire appliance is not able to reach the source of a firefighting water supply from a public road".</p> <p>Fire and Emergency also support the matter of discretion (e) that awards council the discretion to consider "The ability to provide an adequate and reliable firefighting water supply".</p> <p>Fire and Emergency however consider that this rule should be a permitted activity, and subject to the various standards as listed. If not compliant, resource consent should be required as a restricted discretionary activity.</p>	Amend rule to a permitted activity.
11	<i>TRAN-R10. Vehicle access obtained by crossing a railway line</i>	Support	<p>Fire and Emergency supports TRAN-R10 to the extent that the rule requires "The vehicle access point complies with the dimensions required for fire appliances for developments in SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where a driveway length exceeds 75m or a fire appliance is not able to reach the source of a firefighting water supply from a public road.</p> <p>Fire and Emergency also support the matter of discretion (d) that awards council the discretion to consider "The ability to provide an adequate and reliable firefighting water supply".</p>	Retain as notified.
12	<i>TRAN-R11. Number of vehicle access points</i>	Support in part	<p>Fire and Emergency support TRAN-R11 to the extent that one vehicle access point per site onto a district road or a state highway is permitted, enabling developments to proceed as a permitted activity where provided for. However, Fire and Emergency note that it is relatively common for new fire stations to be designed to have two access points to effectively and efficiently manoeuvre fire appliances.</p>	Provide for up to two vehicle access points per site for emergency service facilities as a permitted activity.

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			<p>The purpose of this is so that one access point is used solely for fire appliances exiting the appliance bay and then backing in (if the appliance bay is not a drive through), and the second access point to be utilised for cars / staff and visitors coming and going from the site in order to ensure the appliance bay remains unobstructed.</p> <p>Fire and Emergency therefore seek the ability construct two access points in all zones as a permitted activity. It is noted that the access points would still be subject the access related performances standards in order to manage any actual and potential effects, such as sightlines.</p> <p>Provision for up to two vehicle access points is therefore sought for emergency service facilities.</p>	
13	TRAN-R17. Construction and formation standards	Support	Fire and Emergency supports TRAN-R17 to the extent that every site must be provided with a vehicle access point to a formed road that is constructed to a permanent standard and complies with the standards set out in the Regional Infrastructure Technical Specifications and all activities must comply with the requirements in Figure – TRAN 7.	Retain as notified.
14	TRAN-R18. Additional driveway formation and construction standards	Support in part	<p>Fire and Emergency consider that TRAN-R18 should better align with the standards set out in TRAN-R1, R8 and R10 which includes compliance with in SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. This would mean the minimum driveway width for all zones is 4m. However, Fire and Emergency acknowledge that in some urban settings, a 4m vehicle access width may not be appropriate, therefore support the requirement for passing bays every 50m and the need to comply with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where an accessway exceeds 75m – a requirement of TRAN-R1 and TRAN-R8.</p> <p>Fire and Emergency however request that the minimum vertical clearance from buildings or structures is 4m.</p>	<p>Amend as follows:</p> <p>3. The minimum vertical clearance for buildings and structures is 3.84m</p> <p>...</p>
15	<p>TRAN – Table 3 – Parking and loading requirements and Integrated Transport Assessment (ITA) Thresholds</p> <p>Emergency service facilities 1 space per 50m² of gross floor area</p>	Support in part	<p>The National Policy Statement on Urban Development 2020 (NPS-UD) sets out the following direction for car parking.</p> <p><i>Tier 1, 2 or 3 territorial authorities must remove district plan rules, assessment criteria, policies and objectives that have the effect of setting minimum car parking rates.</i></p> <p><i>Territorial authorities must remove the provisions from their district plans without using a public plan change process (Schedule 1 of the Resource Management Act 1991 (RMA) per section 55 (2A) of the RMA.</i></p> <p><i>Territorial authorities must amend their district plans to remove car parking minimums as soon as practicable, no more than 18 months from the date of commencement of the NPS-UD.</i></p> <p>Fire and Emergency however support emergency service facilities not requiring an ITA or any onsite loading requirement.</p>	Remove minimum parking requirements.
16	Figure – TRAN 7 – Access and road standards	Support in part	<p>Fire and Emergency consider that Figure – TRAN 7 should better align with the standards set out in TRAN-R1, R8 and R10 which includes compliance with in SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. However, Fire and Emergency acknowledge that in some urban settings, a 4m vehicle access width may not be appropriate, therefore support the requirement for passing bays every 50m and the need to comply with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where an accessway exceeds 75m – a requirement of TRAN-R1, R8 and R10.</p> <p>Fire and Emergency however request that the minimum vertical clearance from buildings or structures is 4m. This is also a duplicate of TRAN-R18(3) and could be deleted.</p>	<p>Amend as follows:</p> <p>Minimum vertical clearance from buildings or structures is 3.84m</p>

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Hazardous Substances				
17	<i>HS - Table 1 - Activities Rules</i>	Support	Fire and Emergency support the intent to avoid any duplication of regulation with the Hazardous Substances and New Organisms Act 1996 (HSNO) and Health and Safety at Work Act 2015 (HSW) and only apply controls to significant hazardous facilities which is defined in the plan with the intent to manage reverse sensitivity effects on the environment of which they are, or intend to be located.	Retain as notified.
Natural Hazards				
18	<i>Objective and policy framework - general</i>	Support in part	<p>Fire and Emergency have an interest in the natural hazards chapter insofar to ensure that the district plan adopts a risk-based approach to flood management and manages land use in areas subject to natural hazard. Managing land use in relation to flood hazards and the consequences of climate change will reduce the incidence of, and associated risk to life and property, and prevent or limit injury, damage to property, land and the environment. This will enable Fire and Emergency to carry out its requirements under the Fire and Emergency Act more effectively.</p> <p>Further, Fire and Emergency support the robust and accurate mapping of the flood hazard areas. Both in respect of identifying the areas of land at risk of flood hazard and climate change effects, but also as a means of communicating to landowners and the community generally the location and extent of land areas subject to flood hazards and susceptibility to climate change effects.</p> <p>Fire and Emergency however request that Council consider adopting objectives and policies specific to wildfire.</p>	<p>Add new policy specific to wildfire as below, or to a similar effect:</p> <p><u>NH-P14 In areas assessed or identified as being potentially subject to elevated fire risk, ensure that an appropriate design and layout, including a buffer area or setback is provided for new subdivision and development, and the following matters are considered:</u></p> <ul style="list-style-type: none"> (a) <u>Access for emergency service vehicles.</u> (b) <u>Provision of and access to emergency firefighting water supply.</u> (c) <u>Separation and management of vegetation (with regard to slope, aspect, management regimes and use of less flammable vegetation), and</u> (d) <u>The design and materials of any buildings.</u> <p><u>NH-P15 Manage wild fire risk by making provision for water supplies and access to buildings for firefighting and appropriate buffers are maintained between new building platforms and forest and bush areas.</u></p>
19	<i>NH-O4. Improve response to and recovery from natural hazard events by encouraging community awareness and use of information and methods contained in Community Response Plans.</i>	Support in part	<p>Fire and Emergency support the improvement of community awareness and the use of information contained in Community Response Plans. Fire and Emergency request specific reference to the Fire Plan for Waikato, <i>Ngā Tai ki te Puku</i> within the district plan to achieve this objective. This will go some way in supporting the community in understanding the risk of wildfire in the district.</p> <p>https://www.fireandemergency.nz/assets/Documents/fire-plan/Waikato-Fire-Plan-2021-2024-approved.pdf</p>	Include reference to the Fire Plan for Waikato, <i>Ngā Tai ki te Puku</i> in the overview of the chapter.
20	<i>NH-R5. Additions to an existing building, or construction of a new building housing a sensitive activity</i>	Support	The Piopio Volunteer Fire Brigade and the Te Kuiti Volunteer Fire Brigade are located within Building Platform Suitability Area C overlay. Fire and Emergency support NH-R5 to the extent that it enables additions to an	Retain as notified.

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			existing building, subject to zone requirements. It is noted that by definition, emergency service facilities are not defined as a 'sensitive activity' therefore would not be subject to a number of the building controls within.	
Ecosystems and Indigenous Biodiversity				
21	<i>Trimming, pruning or removal of indigenous vegetation is permitted where undertaken in the following circumstances:</i> <i>ECO-R7. In all zones to manage fire risk</i>	Support	Fire and Emergency support ECO-R7 to the extent that it enables the trimming, pruning or removal of indigenous vegetation to make fire risk as a permitted activity. Where compliance cannot be achieved, resource consent is required as a discretionary activity.	Retain as notified.
Subdivision				
22	<i>Objectives and policies framework - general</i>	Support	Fire and Emergency support the subdivision policy framework to the extent that subdivision is to be serviced by infrastructure that has been planned, sequenced and provided for in an integrated manner and has sufficient capacity for the proposed development of the site (SUB-O3) and where reticulation is not available, requiring appropriate onsite infrastructure to be provided at the time of subdivision (SUB-P7).	Retain as notified.
23	<i>SUB- Table 2 - Performance Standards</i> <i>SUB-R20. Three waters infrastructure provision</i>	Support	Fire and Emergency strongly support the requirement for all allotments to have access to an independent water supply for firefighting that is compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. Fire and Emergency considers that this rule appropriately recognises the importance of protecting the health, safety and wellbeing of communities from the adverse effects of land use and development, consistent with section 5 of the RMA.	Retain as notified.
24	<i>SUB-R21. Access</i>	Support	Fire and Emergency support the requirement that every allotment must be provided with a formed vehicle access point to a road that is constructed to a permanent standard.	Retain as notified.
Hapori whānui				
25	<i>HW-R6. Tanks associated with residential units</i>	Support	Fire and Emergency support the provision for water tanks with residential units as a permitted activity provided that the minimum setback from road and internal boundaries, height and height in relation to boundary standards for the relevant zone are complied with. This will enable the community to provide for onsite firefighting water supply, where a connection to the reticulated network cannot be achieved or additional level of service is required.	Retain as notified.
NOISE – Noise				
26	<i>Exemptions</i>	Support	Fire and Emergency support the exemptions set out in 8, 10 and 11 which include: <i>8. Any warning device or siren used by emergency services for emergency purposes (and routine testing and maintenance).</i> <i>10. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 38 hours in duration, where they are operated by emergency services or lifeline utilities.</i>	Retain as notified.

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			11. Activities at emergency service facilities associated with emergency response and emergency response training.	
TEMP – Temporary activities				
27	TEMP-R6. Emergency management activities	Support	Fire and Emergency support the provision of emergency management activities as a permitted activity in all zones.	Retain as notified.
PART 3 – AREA-SPECIFIC MATTERS				
Residential Zone				
28	RESZ-O3. While enabling a range of housing options ensure that the principles of good urban design, form, accessibility and functionality are not compromised.	Support	Fire and Emergency support RESZ-O3 as it seeks to ensure the principles of good urban design, form, accessibility and functionality are not compromised. Good urban design is a critical component in the provision of adequate emergency service access.	Retain as notified.
29	RESZ-O9. Avoid the establishment of non-residential activities unless the activity directly provides for the health and wellbeing of the local community.	Support in part	Fire and Emergency support RESZ-O9 which provides for non-residential activities in the RESZ where the activity directly provides for the health and well-being of the local community. This would include the provision of emergency service facilities. Fire and Emergency seek the addition of the word 'safety' to better align with section 5 of the RMA.	Amend as follows: <i>RESZ-O9. Avoid the establishment of non-residential activities unless the activity directly provides for the health, <u>safety</u> and wellbeing of the local community.</i>
30	RESZ-O11. Ensure new development does not exceed available capacities for servicing and infrastructure.	Support	Fire and Emergency support the intent of RESZ-O11 which seeks to ensure new development does not exceed available capacities for servicing and infrastructure. It is important to Fire and Emergency that demand on the reticulated water supply network is carefully managed and that development does not proceed if there are deficiencies in the network or new development exceeds available capacities.	Retain as notified.
31	RESZ-P15. Where non-residential activities which directly provide for the health and wellbeing of the local community are proposed, ensure there is adequate onsite parking and vehicle manoeuvring areas and the proposal includes measures to protect residential amenity and reduce the potential for adverse effects by managing structure design and layout, landscaping, fencing and proximity of activities to site boundaries.	Support in part	Fire and Emergency support the intent of RESZ-P15, however consider the policy can be written in a way that better specifies the requirements.	Amend as follows: <i>RESZ-P15. Where non-residential activities which directly provide for the health, <u>safety</u> and wellbeing of the local community are proposed, ensure there is adequate onsite parking and vehicle manoeuvring areas and the proposal includes <u>adequate onsite parking and vehicle manoeuvring areas</u>, and measures to protect residential amenity and reduce the potential for adverse effects by managing structure design and layout, landscaping, fencing and proximity of activities to site boundaries .</i>
32	RESZ - Table 1 – Activities Rules	Oppose	Emergency service facilities are provided for in the Residential Zone as a discretionary activity. New fire stations in the district may be necessary in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change. 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	Amend the activity status for emergency service facilities to a permitted activity.

ID	Proposed provision	Support / oppose	Submission	Requested relief
			<p>the ability to designate land for the purposes of fire stations. Provisions within the rules of the district plan are therefore the best way to facilitate the development of any new fire stations within the district as urban development progresses.</p> <p>Fire and Emergency consider that emergency service facilities should be provided for as a permitted activity, which will be subject to the performance standards within. Where there is a non-compliance with the performance standards, a restricted discretionary activity is requested subject to the matters of discretion associated with the infringed standard. This will ensure that Council have the discretion over what activities are deemed acceptable to be located in the Residential Zone based on the performance standards infringed.</p>	
33	RESZ-R34 Servicing	Support in part	<p>Fire and Emergency support RESZ-R34(4) to the extent that it requires the provision of a firefighting water supply.</p> <p>However, the prescribed requirements set out the water supply classification 2 (FW2) which is the minimum requirements for sprinklered structures and non-sprinklered housing, which includes single family dwellings and multi-unit dwellings as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</p> <p>FW2 would not be sufficient for all other structures provided for in the RESZ such as 'managed care facilities' and 'residential based visitor accommodation' which may require a higher water supply classification.</p> <p>Fire and Emergency therefore request that the same approach is taken as has been taken for RPROZ-R26(2) which requires 'All developments must have an independent water supply for fire fighting that is compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice'.</p> <p>This would ensure that each development in RESZ is correctly calculated in order to meet the firefighting water supply requirements.</p>	<p>Delete RESZ-R34(4) and replace with the following:</p> <p>4. Where a connection to the Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008;</p> <p>AND</p> <p>Retain the note as notified.</p>
General Rural Zone				
34	GRUZ-O8. Only non-farming activities that are ancillary to a farming activity or have a functional and operational need to locate in the general rural zone shall be enabled.	Support	<p>The ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is paramount for the health, safety and wellbeing of people and the community. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and response times so that they can efficiently and effectively respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies.</p> <p>This objective supports the subsequent rule framework that provides for emergency service facilities as a permitted activity in the GRUZ.</p>	Retain as notified.
35	GRUZ-O11. Ensure new development or re-development is appropriately serviced.	Support	<p>Fire and Emergency support GRUZ-O11 as it seeks to ensure new development or re-development is appropriately serviced. This would include the provision of a firefighting water supply. It is recognised that in most cases, development in the GRUZ is unlikely to have access to a reticulated water supply therefore it is important that developments provide an adequate on-site firefighting water supply.</p> <p>This is supported by the subsequent rule GRUZ-R47 that requires sites to be serviced.</p>	Retain as notified.
36	GRUZ – Table 1 – Activities Rules GRUZ-R8. Emergency services facilities	Support	Fire and Emergency support the provision for emergency service facilities in the General Rural Zone as a permitted activity.	Retain as notified.

ID	Proposed provision	Support / oppose	Submission	Requested relief
37	GRUZ-R37. Minimum setback from road boundaries	Support	Fire and Emergency supports the exception provided to emergency service facilities from the minimum setback from road boundaries rule in the GRUZ. This supports the logistical and operational requirements of Fire and Emergency.	Retain as notified.
38	GRUZ-R46. Maximum building coverage	Oppose	<p>Fire and Emergency note that the minimum building coverage for a volunteer fire station is 250m² and up to 1500m² for a career fire station. Fire and Emergency are concerned that 15% building coverage for sites equal to or less than one hectare would not provide for emergency service facilities should they need to construct a new fire station in the GRUZ in future.</p> <p>Typically, Fire and Emergency purchase land from 2000m² to 4000m² to facilitate the construction and operation of new emergency service facilities. Therefore 15% building coverage on a 2000m² site would provide for 300m² of building coverage. This would only just facilitate a volunteer fire station and would limit their ability to expand in future.</p> <p>It is requested that smaller sites in GRUZ are provided with a maximum building size (GFA) in recognition of smaller sites and associated activities in the GRUZ.</p>	<p>Amend as follows:</p> <p>GRUZ-R46. Maximum <u>building size and building coverage</u></p> <ol style="list-style-type: none"> For sites equal to or less than one hectare the maximum amount of a site which can be covered by buildings is 15%; <u>or</u> <u>500m² total gross floor area, whichever is greater.</u> <u>3.</u> For sites greater than one hectare the maximum amount of a site which can be covered by buildings is 3%.
39	GRUZ-R47. Servicing	Support in part	<p>Fire and Emergency support GRUZ-R46(4) to the extent that it requires the provision of a firefighting water supply.</p> <p>However, the prescribed requirements set out the water supply classification 2 (FW2) which is the minimum requirements for sprinklered structures and non-sprinklered housing, which includes single family dwellings and multi-unit dwellings as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</p> <p>FW2 would not be sufficient for all other structures provided for in the GRUZ such as 'visitor accommodation and residential based visitor accommodation' and 'tourism facilities and retail activities' which may require a higher water supply classification.</p> <p>Fire and Emergency therefore request that the same approach is taken for the GRUZ as has been taken for RPROZ-R26(2) which requires 'All developments must have an independent water supply for fire fighting that is compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice'. This would ensure that each development in GRUZ is correctly calculated in order to meet the firefighting water supply requirements.</p>	<p>Delete GRUZ-R47(4) and replace with the following:</p> <p><u>4. Where a connection to the Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008;</u></p> <p>AND</p> <p>Retain the note as notified.</p>
40	PREC3 - Table 1 – Activities Rules PREC3-R4. Emergency service facilities	Support	Fire and Emergency support the provision of emergency service facilities in the Aerodrome Precinct PREC3 as a permitted activity (PREC3-R4).	Retain as notified.
41	PREC3-R22. Minimum setback from road boundaries	Support	Fire and Emergency supports the exception provided to emergency service facilities from the minimum setback from road boundaries in PREC-R22. This supports the logistical and operational requirements of Fire and Emergency.	Retain as notified.
42	PREC3-R27. Servicing	Support in part	<p>Fire and Emergency support PREC3-R27(4) to the extent that it requires the provision of a firefighting water supply.</p> <p>However, the prescribed requirements set out the water supply classification 2 (FW2) which is the minimum requirements for sprinklered structures and non-sprinklered housing, which includes single family dwellings</p>	<p>Delete PREC3-R27(4) and replace with the following:</p> <p><u>4. Where a connection to the Council's reticulated water supply system compliant with</u></p>

ID	Proposed provision	Support / oppose	Submission	Requested relief
			<p>and multi-unit dwellings as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</p> <p>FW2 would not be sufficient for all other structures provided for in the Aerodrome Precinct (PREC3) such as 'Industrial activities', 'Warehouses, lock-up storage units and storage yards', and 'Storage and sale of aircraft fuel and lubricants' which may require a higher water supply classification.</p> <p>Fire and Emergency therefore request that the same approach is taken for the PREC3 as has been taken for RPROZ-R26(2) which requires 'All developments must have an independent water supply for fire fighting that is compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice'. This would ensure that each development in PREC3 is correctly calculated in order to meet the firefighting water supply requirements.</p>	<p>the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008;</p> <p>AND</p> <p>Retain the note as notified.</p>
Rural Production Zone				
43	<i>RPROZ-O6. Ensure new development or re-development does not exceed available capacities for servicing and infrastructure and is co-ordinated with infrastructure provision.</i>	Support	<p>Fire and Emergency support RPROZ-O6 as it seeks to ensure new development or re-development does not exceed available capacities for servicing and infrastructure and is co-ordinated with infrastructure provision. This is in the context that a reticulated water supply network is unlikely to be present in the zone. It is important that developments provide an adequate on-site firefighting water supply where there are deficiencies in the network or additional capacity is required.</p>	Retain as notified.
44	<i>RPROZ-P10. Where reticulated water, wastewater and stormwater networks are not available, ensure the scale and intensity of development can be serviced by on site non-reticulated wastewater and stormwater methods.</i>	Support in part	<p>Fire and Emergency support RPROZ-P10 as it gives effect to RPROZ-O6 and acknowledges that, where reticulated water supply is not available, that the development can be serviced by on site non-reticulated methods.</p> <p>Fire and Emergency request a minor amendment to capture the term 'water' as an on-site non-reticulated method which are set out in SNZ PAS 4509:2008.</p>	<p>Amend as follows:</p> <p><i>RPROZ-P10. Where reticulated water, wastewater and stormwater networks are not available, ensure the scale and intensity of development can be serviced by on site non-reticulated <u>water</u>, wastewater and stormwater methods.</i></p>
45	<p><i>RPROZ - Table 1 – Activities Rules</i></p> <p><i>RPROZ-R2. Offices, canteens, ablution facilities, medical rooms, recreational facilities, vehicle servicing depots, emergency service facilities and workshops ancillary to the primary purpose of any scheduled activity</i></p> <p><i>RPROZ-R5. Tanks, silos and stormwater ponds</i></p>	Oppose	<p>Fire and Emergency support the permitted activity status for emergency service facilities in the Rural Production Zone (RPROZ-R2).</p> <p>Fire and Emergency also support the permitted activity status for tanks and stormwater ponds which can support the provision of an alternative on-site non-reticulated firefighting water supply required by RPROZ-P10.</p>	Retain as notified.
46	<i>RPROZ-R20. Minimum setback from boundaries</i>	Oppose	<p>Fire and Emergency request that emergency service facilities are excluded from the minimum setback from the road boundaries rule in the Rural Production Zone.</p> <p>This would support the logistical and operational requirements of Fire and Emergency and provide for consistency across the district.</p>	<p>Add as follows:</p> <p>12. Provided emergency service facilities are exempt from this rule.</p>
47	<i>RPROZ-R26. Servicing</i>	Support	<p>Fire and Emergency support RPROZ-R26(2) as it requires all developments to have an independent water supply for firefighting that is compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</p>	Retain as notified.

ID	Proposed provision	Support / oppose	Submission	Requested relief
			This approach is supported by Fire and Emergency as it enables each development to calculate the water supply classification required to service a site.	
Rural Lifestyle Zone				
48	<i>RLZ-O5. Ensure sites are appropriately serviced. Where new development or redevelopment requires planned infrastructure provision, ensure it does not exceed available capacities.</i>	Support	Fire and Emergency support RLZ-O5 as it seeks to ensure sites are appropriately serviced and where new development or re-development requires infrastructure provision, that this does not exceed available capacities. This would include the reticulated water supply network. It is important that new developments do not compromise the existing water supply networks and where there are deficiencies in the network, an adequate on-site firefighting water supply is provided.	Retain as notified.
49	<i>RLZ-P14. Where reticulated wastewater and stormwater networks are not available, restrict the scale and intensity of development and subdivision to ensure it can be serviced by on site non-reticulated wastewater and stormwater methods.</i>	Oppose	Fire and Emergency request that where this policy be amended to include water supply, consistent with RPROZ-P10. This is considered to better support the requirements of RLZ-R27.	Add as follows: RLZ-P14. Where reticulated <u>water</u> , wastewater and stormwater networks are not available, restrict the scale and intensity of development and subdivision to ensure it can be serviced by on site non-reticulated <u>water</u> , wastewater and stormwater methods.
50	<i>RLZ-P18. Provide for non-residential activities only where these provide for the health and well-being of the community and support an identified local need.</i>	Support in part	Fire and Emergency support RLZ-P18 which provides for non-residential activities in the RLZ where the activity directly provides for the health and well-being of the local community and support an identified local need. This would include the provision of emergency service facilities. Fire and Emergency seek the addition of the word 'safety' to better align with section 5 of the RMA.	Add as follows: RLZ-P18. Provide for non-residential activities only where these provide for the health, <u>safety</u> and well-being of the community and support an identified local need.
51	<i>RLZ-P22. Where there is a demonstrated functional and operational need for a non-residential activity to locate within the zone, ensure the bulk, design, scale and intensity of buildings maintains local rural lifestyle character, provides on-site parking and vehicle manoeuvring areas and mitigates adverse effects related to traffic generation, access, noise, vibration and light spill.</i>	Support	The ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is paramount the health, safety and wellbeing of people and the community. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and response times so that they can efficiently and effectively respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies. This policy is considered appropriate for the assessment of emergency service activities which seek to locate in the RLZ.	Retain as notified.
52	<i>RLZ - Table 1 – Activities Rules</i>	Oppose	Emergency service facilities are not provided for in the Rural Lifestyle Zone and therefore default to a non-complying activity. New fire stations may be necessary in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change. 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 are therefore the best way to facilitate the development of any new fire stations within the district as urban development progresses. Fire and Emergency consider that emergency service facilities should be provided for as a permitted activity, and subject to compliance with the performance standards in RLZ - Table 2. Where there is a non-compliance with the performance standards, a restricted discretionary activity is requested subject to the matters of	Add new activity: <u>RLZ-Rx Emergency service facilities</u> <u>Activity status: PER</u>

ID	Proposed provision	Support / oppose	Submission	Requested relief
			discretion associated with the infringed standard. This will ensure that Council have the discretion over what activities are deemed acceptable to be located in the RLZ based on the performance standards infringed.	
53	RLZ-R18. Minimum setback from road boundaries	Oppose	Fire and Emergency request that emergency service facilities are excluded from the minimum setback from road boundaries rule in the Rural Lifestyle Zone. This supports the logistical and operational requirements of Fire and Emergency which include the need for fire appliances to be strategically located adjacent to the transport corridor for prompt emergency response. Also, greater setbacks increase civil costs, land parcel size and can create fire separation issues at the rear boundary. Ideally, Fire and Emergency would construct buildings no further than 8-10m from the road frontage in order facilitate fire appliance stopping so they are not on the roading network.	Add as follows: <u>3. Provided emergency service facilities are exempt from this rule.</u>
54	RLZ-R26. Maximum building coverage	Oppose	Fire and Emergency note that the minimum building coverage for a volunteer fire station is 250m ² and up to 1500m ² for a career fire station. RLZ-R26(1) provides for a maximum building coverage of 25% for site equal to or less than 2500m ² and for all other sites the maximum amount of a site which can be covered by buildings is 20%. Typically, Fire and Emergency purchase land from 2000m ² to 4000m ² to facilitate the construction and operation of new emergency service facilities however this can be less depending on the district. Therefore 25% building coverage on a 2000m ² site would provide for 500m ² of building coverage which would facilitate a volunteer fire station. It is requested that for smaller sites in RLZ are provided with a maximum building size (GFA) in recognition of smaller sites and associated activities that may need to be located in the RLZ to support the community in future.	Amend as follows: RLZ-R26. Maximum <u>building size and</u> building coverage 1. For sites equal to or less than 2500 m ² the maximum amount of a site which can be covered by buildings is 25%; <u>and or</u> <u>2. 500m² total gross floor area, whichever is greater.</u> 2. For all other sites the maximum amount of a site which can be covered by buildings is 20%.
55	RLZ-R27. Servicing	Support	Given the permitted activities provided for in the RLZ, Fire and Emergency consider that the prescribed FW2 requirements are appropriate in the RLZ given that the permitted activities provided for are primarily residential in nature. Fire and Emergency support the RLZ-R27(4) to the extent that is requires the provision of FW2 minimum requirements as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice in the Rural Lifestyle Zone.	Retain as notified.
Settlement Zone				
56	SETZ-O1. Enable a mix of residential, community, educational and commercial activities of an appropriate scale, to locate within the zone.	Oppose	Fire and Emergency request that SETZ-O1 be amended to better reflect the rule framework which provides for emergency service facilities as a permitted activity.	Amend as follows: SETZ-O1. Enable a mix of residential, community, educational and commercial activities <u>and emergency service facilities</u> of an appropriate scale, to locate within the zone.
57	SETZ-O5. Ensure new development does not exceed available capacities for servicing and infrastructure.	Support	Fire and Emergency support SETZ-O5 as it seeks to ensure new development does not exceed available capacities for servicing and infrastructure. This would include the reticulated water supply network. It is important that new developments do not compromise the existing water supply networks and where there are deficiencies in the network, an adequate on-site firefighting water supply is provided.	Retain as notified.

ID	Proposed provision	Support / oppose	Submission	Requested relief
58	SETZ-P13. Where reticulated wastewater networks are not available, restrict the scale and intensity of development and subdivision to ensure it can be serviced by on site non-reticulated wastewater and stormwater methods.	Oppose	Fire and Emergency request that this policy be updated to include reference to the water supply and stormwater networks, consistent with similar policy within the PDP.	Amend as follows: SETZ-P13. Where reticulated <u>water, wastewater and stormwater</u> networks are not available, restrict the scale and intensity of development and subdivision to ensure it can be serviced by on site non-reticulated <u>water, wastewater and stormwater</u> methods.
59	SETZ - Table 1 – Activities Rules SETZ-R5. Emergency services facilities	Support	Fire and Emergency support the provision of emergency service facilities in the Settlement Zone as a permitted activity (SETZ-R5). A minor amendment is sought for consistency.	Amend as follows: SETZ-R5. Emergency services facilities
60	SETZ-R40. Maximum building coverage	Oppose	Fire and Emergency note that the minimum building coverage for a volunteer fire station is 250m ² and up to 1500m ² for a career fire station. The maximum total building coverage on a site in the SETZ must not exceed 35% of the net site area. There are two fire stations located in the SETZ which have site areas of approximately 751m ² and 1000m ² . Fire and Emergency are concerned that this provision would not provide for Fire and Emergency the ability to construct new or expand their existing emergency service facilities in the SETZ to provide for growth in the future. It is requested that smaller sites in SETZ are provided with a maximum building size (GFA) in recognition of smaller sites and associated activities that may need to be located in the SETZ to support the community in future.	Amend as follows: SETZ-R40. Maximum <u>building size and</u> building coverage 1. The maximum total building coverage on a site must not exceed 35% of the net site area, <u>or</u> <u>2. 500m² total gross floor area, whichever is greater.</u>
61	SETZ-R44. Servicing	Support	Fire and Emergency support the SETZ-R44(4) to the extent that it requires the provision of FW2 minimum requirements as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice in the Settlement Zone.	Retain as notified.
Commercial Zone				
62	COMZ-O2. Provide for community facilities, educational facilities and marae complexes in the commercial zones.	Oppose	Fire and Emergency request that COMZ-O2 be amended to better reflect the rule framework which provides for emergency service facilities as a permitted activity.	Amend as follows: COMZ-O2. Provide for community facilities, educational facilities, <u>emergency service facilities</u> and marae complexes in the commercial zones.
63	COMZ-P9. Ensure new development does not exceed available capacities for servicing and infrastructure.	Support	Fire and Emergency support COMZ-P9 as it seeks to ensure new development does not exceed available capacities for servicing and infrastructure. This would include the reticulated water supply network. It is important that new developments do not compromise the existing water supply network and where there are deficiencies in the network, an adequate on-site firefighting water supply is provided.	Retain as notified.
64	COMZ - Table 1 - Activities Rules COMZ-R13. Emergency services facilities	Support	Fire and Emergency support the provision of emergency service facilities in the Commercial Zone as a permitted activity (COMZ-R13).	Retain as notified.

ID	Proposed provision	Support / oppose	Submission	Requested relief
65	COMZ-R33. Servicing	Support in part	<p>Fire and Emergency support in part COMZ-R33(1) to the extent that all sites/developments must be connected to the Council's reticulated water supply system.</p> <p>While Fire and Emergency recognise that most commercial activities within Waitomo district will occur within the urban environment where a connection to Council's reticulated network is available, Fire and Emergency is not confident that the Council can guarantee this, nor that the reticulated network will have sufficient capacity and pressure to service these developments in accordance with the Code of Practice (i.e. provide a level of service greater than FW2). Where additional firefighting water is required, private storage should be designed to comply with the requirements of the Code of Practice.</p> <p>It is considered that this approach will help the Waitomo community in securing the provision of firefighting water for new buildings where supplies may be inadequate. This will provide for the health and safety of people and communities in the Waitomo district.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> All sites/developments must be connected to the Council's reticulated wastewater and water supply system. <u>Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008;</u> <p><u>Note: Further advice and information about managing fire risk and storage of water for firefighting purposes can be obtained from Fire and Emergency New Zealand and SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice (refer Table 1 and 2).</u></p>
66	COMZ - Table 3 – Activities Rules – Te Kuiti CBD Precinct (PREC5)	Support	Fire and Emergency support the permitted activities in PREC5 being subject to all of the performance standards in COMZ – Table 2 which includes COMZ-R33.	Retain as notified.
Industrial Zone				
67	INZ-O2. Ensure that non-industrial activities are directed to other zones to protect both the industrial and residential land supply, and the viability of the district's commercial zones.	Oppose	<p>Fire and Emergency recognise the importance of securing industrial land for industrial purposes. However, in some cases, there may be a need for fire stations to locate in the INZ.</p> <p>Fire and Emergency request that this objective be amended to better reflect the rule framework which provides for emergency service facilities as a permitted activity.</p>	<p>Amend as follows:</p> <p>Ensure that non-industrial activities are directed to other zones to protect both the industrial and residential land supply, and the viability of the district's commercial zones –, unless the non-industrial activity provides for the health, safety and well-being of the community and supports an identified local need.</p>
68	INZ-O5. Ensure new development or re-development does not exceed available capacities for servicing and infrastructure and is co-ordinated with infrastructure provision	Support	Fire and Emergency support INZ-O5 as it seeks to ensure new development or re-development does not exceed available capacities for servicing and infrastructure. This would include the reticulated water supply network. It is important that new developments do not compromise the existing water supply network and where there are deficiencies in the network, an adequate on-site firefighting water supply is provided.	Retain as notified.
69	INZ-P6. Coordinate the provision of reticulated services and other infrastructure with the development of sites. Where reticulated water,	Support in part	Fire and Emergency request that this policy be updated to include reference to the water supply network, consistent with similar policy within the PDP.	Amend as follows:

ID	Proposed provision	Support / oppose	Submission	Requested relief
	<i>wastewater and stormwater networks are not available, ensure the scale and intensity of development can be serviced by on site non-reticulated wastewater and stormwater methods.</i>			INZ-P6. Coordinate the provision of reticulated services and other infrastructure with the development of sites. Where reticulated water, wastewater and stormwater networks are not available, ensure the scale and intensity of development can be serviced by on site non-reticulated <u>water</u> , wastewater and stormwater methods.
70	INZ - Table 1 - Activities Rules INZ-R7. Emergency service facilities	Support	Fire and Emergency support the provision of emergency service facilities in Industrial Zone as a permitted activity (INZ-R7).	Retain as notified.
71	INZ-R24. Site layout	Support	Fire and Emergency support the exception for emergency service facilities from rule INZ-R24 that requires that the main public entrance into a building must be orientated so that it is parallel to the road boundary of the site.	Retain as notified.
72	New standard	New	<p>Council seek to manage activities that require more than 15m³ of water per day from the reticulated municipal water supply system for purposes other than human drinking and sanitation (INZ-R28). However, Fire and Emergency note that there is no servicing standard for the Industrial Zone that requires industrial activities to provide a firefighting water supply.</p> <p>While Fire and Emergency recognise that most industrial activities within Waitomo district will occur within the urban environment where a connection to Council's reticulated network is available, Fire and Emergency is not confident that the Council can guarantee a connection, nor that the reticulated network will have sufficient capacity and pressure to service these developments in accordance with the Code of Practice (i.e. provide a level of service greater than FW2). Where additional firefighting water is required, private storage should be designed to comply with the requirements of the Code of Practice.</p> <p>It is considered that this approach will help the Waitomo community in securing the provision of firefighting water for new buildings where supplies may be inadequate. This will provide for the health and safety of people and communities in the Waitomo district.</p>	<p>Add new standard as follows</p> <p><u>IND-R30 - Servicing</u></p> <ol style="list-style-type: none"> <u>All sites/developments must be connected to the Council's reticulated water supply system.</u> <u>Where a connection with Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.</u> <p><u>Note: Further advice and information about managing fire risk and storage of water for firefighting purposes can be obtained from Fire and Emergency New Zealand and SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice (refer Table 1 and 2).</u></p>
Natural Open Space Zone				
73	NOSZ-P2.	Oppose	Fire and Emergency request that NOSZ-P2 is amended to ensure that any new buildings in the NOSZ are provided with a firefighting water supply to ensure fire risk is managed.	Amend as follows:

ID	Proposed provision	Support / oppose	Submission	Requested relief
				<p>NOSZ-P2. Enable use and development that protects the natural open space character, values and amenity of the zone where the use and development:</p> <p>[...]</p> <p><u>7. Require new buildings and structures to provide a firefighting water supply to manage fire risk.</u></p>
74	<i>New standard</i>	New	Fire and Emergency consider that new buildings located in the NOSZ should be required to provide a firefighting water supply in order to manage fire risk.	<p><u>NOSZ-R13 - Servicing</u></p> <p>1. <u>Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.</u></p> <p><u>Note: Further advice and information about managing fire risk and storage of water for firefighting purposes can be obtained from Fire and Emergency New Zealand and SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice (refer Table 1 and 2).</u></p>
Open Space Zone				
75	OSZ-P2.	Oppose	Fire and Emergency request that OSZ-P2 is amended to ensure that any new buildings in the OSZ are provided with a firefighting water supply to ensure fire risk is managed.	<p>Amend as follows:</p> <p>OSZ-P2. The use and development of the open space zone must:</p> <p>[...]</p> <p>8. Ensure there is adequate existing or planned infrastructure to service the activity and/or development, <u>including a firefighting water supply</u>; and</p>
76	<i>New standard</i>	New	Fire and Emergency consider that new buildings located in the OSZ should be required to provide a firefighting water supply in order to manage fire risk.	<p>Add new performance standards as follows:</p> <p><u>OSZ-R16 - Servicing</u></p>

ID	Proposed provision	Support / oppose	Submission	Requested relief
				<p>1. Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.</p> <p>Note: Further advice and information about managing fire risk and storage of water for firefighting purposes can be obtained from Fire and Emergency New Zealand and SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice (refer Table 1 and 2).</p>
Maori Purpose Zone				
77	<i>MPZ-O3. Ensure new development or re-development does not exceed available capacities for servicing and infrastructure and is co-ordinated with infrastructure provision.</i>	Support	Fire and Emergency support MPZ-O3 as it seeks to ensure new development and re-development does not exceed available capacities for servicing and infrastructure. This would include the reticulated water supply network. It is important that new developments do not compromise the existing water supply network and where there are deficiencies in the network, an adequate on-site firefighting water supply is provided.	Retain as notified.
78	<i>MPZ-P6. Where reticulated water, wastewater and stormwater networks are not available, ensure the scale and intensity of development can be serviced by on site non-reticulated wastewater and stormwater methods.</i>	Support in part	Fire and Emergency request that this policy be updated to include reference to the water supply network, consistent with similar policy within the PDP.	<p>Amend as follows:</p> <p>MPZ-P6. Where reticulated water, wastewater and stormwater networks are not available, ensure the scale and intensity of development can be serviced by on site non-reticulated water, wastewater and stormwater methods.</p>
79	<i>MPZ-R26. Servicing</i>	Support in part	<p>Fire and Emergency supports the intent of MPZ-R26(4) to the extent that it requires the provision of FW2 minimum requirements as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice in the Maori Purpose Zone.</p> <p>However Fire and Emergency would highlight that taking this approach of prescribing how firefighting water supply must be provided does remove the flexibility inherent within SNZ PAS 4509:2008 which provides for alternative methods of servicing, such as a communal firefighting water supply which may be beneficial for marae complex and papakāinga. While prescribing the means of providing firefighting water supply in the rule could be perceived as providing plan users and applicants with greater clarity, it does have the disadvantage of removing the ability to provide firefighting water supply using alternative means such as a communal firefighting water supply which Fire and Emergency does not support.</p>	<p>Delete MRZ-R26(4) and replace with the following:</p> <p>4. Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.</p> <p>AND</p>

ID	Proposed provision	Support / oppose	Submission	Requested relief
				Retain the note as notified.
Tourism Zone				
80	<i>TOUZ-O4. Ensure new development or re-development does not exceed available capacities for servicing and infrastructure and is co-ordinated with infrastructure provision.</i>	Support	Fire and Emergency support TOUZ-O4 as it seeks to ensure new development and re-development does not exceed available capacities for servicing and infrastructure. This would include the reticulated water supply network. It is important that new developments do not compromise the existing water supply network and where there are deficiencies in the network, an adequate on-site firefighting water supply is provided.	Retain as notified.
81	<i>TOUZ-P9. Where reticulated wastewater and stormwater networks are not available, restrict the scale and intensity of development and subdivision to ensure it can be serviced by on site non-reticulated wastewater and stormwater methods.</i>	Oppose	Fire and Emergency request that this policy be updated to include reference to the water supply network, consistent with similar policy within the PDP.	Amend as follows: TOUZ-P9. Where reticulated <u>water</u> , wastewater and stormwater networks are not available, restrict the scale and intensity of development and subdivision to ensure it can be serviced by on site non-reticulated <u>water</u> , wastewater and stormwater methods.
82	<i>TOUZ - Table 1 – Activities Rules TOUZ-R11. Emergency services facilities</i>	Support	Fire and Emergency support the provision of emergency service facilities in Tourism Zone as a permitted activity (TOUZ-R11).	Retain as notified.
83	<i>TOUZ-R41. Servicing</i>	Support	<p>Fire and Emergency support the intent of TOUZ-R41(4) to the extent that it requires the provision of FW2 minimum requirements as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice in the TOUZ.</p> <p>However, the prescribed requirements set out the water supply classification 2 (FW2) which is the minimum requirements for sprinklered structures and non-sprinklered housing, which includes single family dwellings and multi-unit dwellings as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</p> <p>FW2 would not be sufficient for all other structures provided for in the TOUZ such as 'tourism facilities', 'retail activities' 'Educational facilities and community facilities, libraries and museums' and 'visitor accommodation' among other permitted activities that may require a higher water supply classification due to their scale and fire hazard category.</p> <p>Fire and Emergency therefore request that the same approach is taken for the GRUZ as has been taken for RPROZ-R26(2) which requires 'All developments must have an independent water supply for fire fighting that is compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice'. This would ensure that each development in TOUZ is correctly calculated in order to meet the firefighting water supply requirements.</p>	<p>Delete TOUZ-R41(4) and replace with the following:</p> <p>4. <u>Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.</u></p> <p>AND</p> <p>Retain the note as notified.</p>
Te Maika Precinct				
84	<i>PREC7-P9. Ensure new development is designed and located to manage significant risks from natural hazards.</i>	Support	As defined, natural hazards include 'fire'. It is important that new developments are designed and located to manage the risks from fire, given the remoteness of the precinct.	Retain as notified.

ID	Proposed provision	Support / oppose	Submission	Requested relief
85	<i>PREC7-R8. Tanks</i>	Support	Fire and Emergency support the provision of water storage tanks as a permitted activity. This will enable the community to provide for onsite water storage including capacity for firefighting. This is important for PREC7 due to the remoteness of the area.	Retain as notified.

Appendix B – Examples of towers and poles associated with emergency service facilities.



Mount Maunganui – Pole for hose drying



Taupo – Multipurpose tower



Lake Ōkāreka - Pole for aerials and siren