

# Submission on notified Plan Changes 78-80 to Auckland Unitary Plan

*Intensification Streamlined Planning Process (ISPP)*

**To:** Auckland Council

**Submission from:** Fire and Emergency New Zealand

**This is a combined submission on behalf of Fire and Emergency New Zealand (Fire and Emergency) to Auckland Council (AC) on Proposed Plan Changes 78-80.**

## 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 environment<sup>1</sup>.

Fire and Emergency's main functions<sup>2</sup> 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 functions<sup>3</sup> are:

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

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<sup>1</sup> Fire and Emergency New Zealand Act 2017 section 10(a)(b)

<sup>2</sup> Fire and Emergency New Zealand Act 2017 section 11(2)

<sup>3</sup> 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.

Through a memorandum of understanding with St John, Fire and Emergency attends all life threatening and life critical events.

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.<sup>4</sup>

On average, Fire and Emergency attend 23,503<sup>5</sup> incidents annually across Auckland. This includes an average of:

- 4,380 fires
- 3,920 medical emergencies
- 2,008 vehicle accidents
- 1,814 rescues and public assists<sup>6</sup>
- 863 HAZMAT/Heat/Pressure/Electrical hazard

Fire and Emergency also faces broad challenges, such as the increasing frequency and severity of extreme weather events associated with climate change, 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 emergency service providers, such as Fire and Emergency, 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 other regulatory reforms, such as 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 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. Further, the management of significant

<sup>4</sup> 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)

<sup>5</sup> Average 2017-2021

<sup>6</sup> 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.

risks for natural hazards is a matter of national importance under section 6 of the Resource Management Act 1991 (RMA) and is included in the definition of a Qualifying Matter in the Enabling Act.

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

Fire and Emergency appreciates the engagement to date with Auckland Council on intensification. This submission further addresses the matters relating to activities required to be undertaken to enable effective emergency response and to provide for the health and safety of people and communities in Auckland. Issues of particular interest and relevance to Fire and Emergency broadly include:

- ensuring emergency services appliances and Fire and Emergency personnel can adequately access both built and natural environments across Auckland in the event of an emergency, and
- ensuring new development, including infill development, is adequately serviced by firefighting water supply,
- 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.

In particular, Fire and Emergency have been noting the following concerns in recent intensification across Auckland that will be elaborated on in this submission:

- Development inaccessible by emergency vehicle or personnel; exceeding 70m hose length or unworkable for use of other equipment such as ladders due to driveway/pedestrian pathway widths, lack of hardstand etc.
- Distances to fire hydrants calculated as the crow flies as opposed to actual lengths to and around the site
- Inadequate reticulated water supply with insufficient pressure for firefighting to serve development
- Where alternative water supply proposed, it is not of a size/scale appropriate to serve the development or there is inadequate access to reach the alternative water supply source

Given the interrelated topics for Fire and Emergency from Plan Changes 78-80, these have been responded to in the one submission for concision.

## 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. While a more compact urban form focused on walkability and intensification around public transport (and subsequent mode shift) can reduce congestion and subsequently emergency response times, intensification and infill housing in Auckland are 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 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 / residents are able to evacuate in the event of an emergency. If emergency responders 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.

With regard to this, Fire and Emergency support the qualifying matter relating to transport constraints that has been proposed for Beachlands.

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, increasing the number of developments that provide only pedestrian access.

Attached as **Appendix B** are built examples of pedestrian only access developments that Fire and Emergency are aware of which, should a fire or other emergency occur have the potential to give rise to many significant operational issues Fire and Emergency are encountering with new developments. Also included are Fire and Emergency operational requirements for manoeuvring equipment which demonstrates their need to have appropriate physical manoeuvrability around buildings and structures.

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.

Given the shortfalls with the NZBC (C5) and the lack of clarity/consistency in the interpretation/application of the NZBC and the RMA, Fire and Emergency are concerned that the requirements of PC79 for pedestrian only access developments (particularly Standard 27.6.6) are not 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.

With the Auckland Unitary Plan allowing for pedestrian only developments, this means that many developments will be unable to comply with the NZBC Fire and Emergency vehicular access requirements and subsequently emergency responder access is not provided. This is a significant concern for Fire and Emergency.

In the interim period while the NZBC catches up with the changing urban environment, Fire and Emergency consider that the 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 Auckland, Fire and Emergency recommend:

- pedestrian accessways are clear, unobstructed and well-lit,

- wayfinding for different properties on a development are clear in day and night,
- developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide,
- 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.

At a minimum, it is recommended that Auckland Council cross reference the NZBC requirements for firefighter access. Where resource consent is required for sites with no vehicle access, matters of discretion should include consideration of the extent to which access for emergency response is provided for. Urban design guidelines 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 councils' urban design guides could assist in this 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)<sup>7</sup>, are further detailed in Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021)<sup>8</sup> 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 Fire and Emergency's 'Designers' 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 access to a water supply and must also be able to base operations near the fire source, 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 emergency response access to these particular buildings in the urban environment.
- For buildings to which C5 vehicle access requirements apply, Fire and Emergency observe significant dispensations given to developments at the time of building consent and therefore compliance with the NZBC is not achieved in many cases. In many cases Fire and Emergency have been informed that dispensations have been granted in recognition that a resource consent for the development has been obtained.

Fire and Emergency has strong concerns that even in situations where the NZBC applies, many recent developments are not compliance 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). In

<sup>7</sup> 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>

<sup>8</sup> 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>

addition, there have been recent examples of residential applications that have provided on-site alternative water supply for firefighting to respond to insufficient reticulated supply, but inadequate emergency access meaning that a fire appliance would not be able to reach the firefighting water supply.

For these reasons, AC need to carefully consider how emergency vehicle access will be provided for new residential developments.

Given the apparent gap in the NZBC, significant consideration needs to be given to new rules and a related policy framework to enable adequate access to 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 AUP introduce rules that 'duplicate' the 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.

Without these measures, emergency responder access often indirectly relies on the provisions relating to rubbish disposal that are not fit for this alternative purpose. Waste disposal provisions are an example of another issue that is addressed in detail in both the Building Code and Unitary Plan. Fire and Emergency consider that this dependence on waste disposal provisions does not reflect:

- the importance of Fire and Emergency's operations in preventing or limiting loss of life, injury or damage;
- Section 5 of the RMA in providing for people and communities health and safety; and
- Well-functioning urban environments as per the NPS-UD

Further, Fire and Emergency seek the provision of adequate access through voluntary measures such as 'best practice' recommendations in the urban design manual or similar. These proposed measures would encourage developments to consider early in their design the requirements of emergency services. Fire and Emergency recommends developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide. The PC79 Section 32 report recommends a practice note be developed and distributed to Planners and Transport Engineers that outlines the requirements of the Building Code. Fire and Emergency request that AC engage with Fire and Emergency on the writing of the Note and that the scope of the Note is widened to reference the Firefighting Operations Emergency Vehicle Access Guide.

Adequate provision for emergency responder 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.

In addition, Fire and Emergency support the PC79 Section 32 report non-statutory recommendation that Auckland Council continues to advocate to central government for changes to the Building Code with relation to emergency service providers.

### 1.2.3 Carparking

Fire and Emergency is already encountering new development where emergency vehicle access along the roading corridor has been challenging. While removal of carparking (and cars) should mean fewer obstructions, Fire and Emergency have been finding issues with emergency vehicle access in these locations from 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 effects of car parking supply and demand in resource consent applications. 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 rule, or a national environmental standard.

Fire and Emergency request that AC 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 AC 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. Refer to obstructed access examples in **Appendix B**.

The 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 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 AC to consider integrating these considerations into the urban design guides 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 front, side and rear boundary setback rules within PC78.

### 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 Auckland, 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 the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008<sup>9</sup>. The Code of Practice 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. It is incorporated by reference in the Auckland Unitary Plan. Fire and Emergency acknowledge that Te Ture ā-Rohe Whakaroto Wai me te Pae Kōtuitui Wai Para 2015 Water Supply and Wastewater Network Bylaw 2015 (the Bylaw) has a purpose to assist in the provision of reliable, safe, and efficient water supply and wastewater services. Under this bylaw Watercare may refuse an approval for a connection to the water supply if the connection may detrimentally affect its ability to supply water at the volume and/ or pressure required for firefighting. SNZ PAS 4509:2008 is referenced in the Bylaw as a code that may be enforced.

This should be included as an advice note to prompt developers to consider requirements for water early in design.

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 Three Waters, in particular the water supply network. Given this, Fire and Emergency strongly support Auckland Council's approach of including water supply constraints as a qualifying matter.

For the continued applicability of the Infrastructure – Water and/or Wastewater Constraints Control, Fire and Emergency consider that Auckland will need to maintain sophisticated water network models. This will assist AC in identifying areas across Auckland where there is potential or known infrastructure capacity constraints and will enable Council to manage the cumulative impacts of urban infill on the water supply network. Fire and Emergency request that this is considered ongoing so that when and where needed further areas can be included under the water supply constraint control.

Fire and Emergency considers that all subdivision and development should be subject to development standards within the AUP 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 Code of Practice 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.

Fire and Emergency further encourage AC to consider bringing forward Long Term Plan investments to upgrade the water supply in residential areas in order to be able to provide the required capacity.

<sup>9</sup> 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>



## 1.4 Demand on emergency services

Fire and Emergency has a Statement of Performance Expectations<sup>10</sup> which sets out targets to delivering timely and effective fire response and suppression services as well as other services<sup>11</sup>.

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 Auckland.

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. Given this, Fire and Emergency support Plan Change 80 in so far as it makes reference to the need for well-functioning urban environments and improved resilience to the effects of climate change.

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 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 AUP therefore may be the best way to facilitate the development of any new emergency service facilities as the city grows. Ongoing, and more frequent engagement with Fire and Emergency in terms of growth projections and demographic changes will assist us in understanding where we may need 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:**

Alongside general support for PC80, Appendix A details the specific amendments sought by Fire and Emergency to provisions in PC78 and PC79, and the reasons for these 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 to the Plan Change provisions as notified.

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<sup>10</sup> 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>

<sup>11</sup> Fire and Emergency Act 2017 sections 10-12

**9(2)a**

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

**Date:** 22/09/2022  
**Electronic address for service:** [REDACTED]  
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**Contact person:** [REDACTED]

Released under the Official Information Act 1982

## Appendix A

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

ID	Provision	Support / oppose	Submission	Requested amendment
<b>Chapter E Auckland-wide</b>				
<b>E27 Transport</b>				
PC79: 1	Objective E27.2.(5A) <i>(5A) Safe and direct on site access for pedestrian and other users is provided to dwellings, in residential zones.</i>	<b>Support</b>	Fire and Emergency support the provision in so far that they consider that 'pedestrian and other users' include emergency responders.	No amendments sought
PC79: 2	Policy E27.3.(20A) <i>(20A) Require vehicle accesses to be designed and located to provide for low speed environments and for the safety of pedestrians and other users, and require pedestrian access that is adjacent to a vehicle access to be designed and located to provide for safe and direct movement, minimising potential conflicts between pedestrians and other users.</i>	<b>Support in part</b>	Fire and Emergency seek recognition of the need for access to include access for emergency responders.	<i>(20A) Require vehicle accesses to be designed and located to provide for low speed environments, <u>for emergency responders</u> and for the safety of pedestrians and other users, and require pedestrian access that is adjacent to a vehicle access to be designed and located to provide for safe and direct movement, minimising potential conflicts between pedestrians and other users.</i>
PC79: 3	Policy E27.3.(20B) <i>(20B) Require pedestrian access that is the sole means of access between residential zoned dwellings and the public road, to be designed and located to provide for safe and direct movement, minimising potential conflicts between pedestrians and other users.</i>	<b>Oppose in part</b>	As highlighted in the submission, Fire and Emergency are concerned that pedestrian-only access developments will not have sufficient access for emergency responders.	<i>(20B) Require pedestrian access that is the sole means of access between residential zoned dwellings and the public road, to be designed and located to provide for <u>emergency responder access</u>, safe and direct movement, minimising potential conflicts between pedestrians and other users.</i>
PC79: 4	Standard E27.6.1 Trip generation	<b>Support</b>	Fire and Emergency support the reduction in new development trip generation thresholds. Fire and Emergency consider that this is necessary to manage the cumulative impacts of greater intensification on the transport network which would impact emergency responses.	No amendments sought.
PC79: 5	Standard E27.6.3.5 Vertical Clearance	<b>Oppose in part</b>	Fire appliances require a 4m height clearance.	<i>(1) To ensure vehicles can pass safely under overhead structures to access any parking and loading spaces, the minimum clearance between the formed surface and the structure must be <u>at least 4m</u>:  <del>(a) 2.1m where access and/or parking for cars is provided for residential activities;</del>  <del>(b) 2.3m where access and/or parking for cars is provided for all other activities;</del>  <del>(c) 2.5m where access and/or accessible parking for people with disabilities is provided and/or required; or</del></i>

ID	Provision	Support / oppose	Submission	Requested amendment
				<p><del>(ca) 2.8m where loading is required for residential activities denoted with an asterisk (*) in Table E27.6.2.7; or</del></p> <p><del>(d) 3.8m where loading is required for all other activities.</del></p>
PC79: 6	Standard E27.6.4.3 Width of vehicle access, queuing and speed management requirements	<b>Support in part</b>	<p>Fire and Emergency support that reference is made to consideration of fire emergency vehicle access. Bringing these controls to the attention of plan users (i.e. developers) early on in the resource consent process means they can incorporate the NZBC requirements early on in their design.</p> <p>However, as detailed in the submission, the NZBC requirements have gaps. As such, Fire and Emergency request that the provisions included in the AUP provide for emergency responder access. Fire and Emergency require at minimum a 4m width for emergency vehicles to be able to access sites. The proposed width of 2.75m would significantly impact the ability of emergency responders to provide effective and efficient assistance.</p> <p>Without the changes recommended above, assessment of non-compliance with this standard against matter of discretions is challenging as the permitted baseline is already insufficient.</p>	<p>Table E27.6.4.3.2 Vehicle crossing and vehicle access widths</p> <p>Minimum formed access width:</p> <p>5.5m (providing for two-way movements) The formed width is permitted to be narrowed to <u>4m 2.75m</u> if there are clear sight lines along the entire access and passing bays at 50m intervals are provided.</p> <p>...</p> <p>Where vehicle accessways are provided, consideration of fire emergency vehicle access is required by the New Zealand Building Code Clause C6. <u>Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>
PC79: 7	Standard E27.6.6 Design and location of pedestrian access in residential zones	<b>Oppose in part</b>	<p>The submission above notes Fire and Emergency's concerns with pedestrian-only access developments not providing for emergency responder access. The proposed design standards are not adequate for emergency responders to undertake operational activities including movement of ladders.</p>	<p>(1) Any pedestrian access, in residential zones, serving two or more dwellings, where there is no vehicle access must:</p> <p>(a) have a minimum formed access width of <u>4.8m 3m on a straight accessway and 6.2m on a curved or cornered accessway</u>;</p> <p>(b) provide passing bays in accordance with Table E27.6.6.1;</p> <p>(c) meet the maximum gradient, in accordance with Table E27.6.6.2;</p> <p>(d) provide artificial lighting in accordance with Standard E24.6.2;</p> <p>(e) have a surface treatment which is firm, stable and slip resistant in any weather conditions;</p> <p>(f) provide direct access to the dwellings from a public footpath;</p> <p>(g) be unobstructed for its full length; and</p> <p>(h) where the pedestrian access includes steps, provide a step-free option as specified in NZS 4121:2001 Design for access and mobility: Buildings and associated facilities.</p> <p><u>Advice note:</u></p>

ID	Provision	Support / oppose	Submission	Requested amendment
				<p><u>Emergency responder access 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 consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p> <p><u>The Designer's Guide' to Firefighting Operations Emergency Vehicle Access provides additional guidance.</u></p>
PC79: 8	Matters of discretion E27.8.1 (9)	Support in part	Fire and Emergency support the matters of discretion for infringements of access design standards. Fire and Emergency request explicit reference to the provision of emergency responder access as a matter of discretion.	<p>(9) any activity or development which infringes the standards for design of parking and loading areas or access under Standards E27.6.3, E27.6.4.2, E27.6.4.3, E27.6.4.3A E27.6.4.4 and E27.6.6:</p> <p>(a) adequacy for the site and the proposal;</p> <p>(aa) site limitations;</p> <p><u>(aaa) adequacy of emergency responder access</u></p> <p>(b) design of parking, loading and access;</p> <p>(ba) effects on pedestrian safety and accessibility;</p>
PC79: 9	Assessment criteria E27.8.2 (3)	Support in part		<p>(3) any activity or subdivision which exceeds the trip generation thresholds under Standard E27.6.:</p> <p>a) the effects on the function and the safe and efficient operation of the transport network with consideration of all modes of transport, <u>including emergency responders</u>, particularly at peak times;</p>
PC79: 10	Assessment criteria E27.8.2 (8)	Support in part	Fire and Emergency request explicit reference to the provision of emergency responder access as an assessment criteria.	<p>Add to E27.8.2(8):</p> <p><u>(e) the safety and practicality of emergency responder access.</u></p>
<b>E28 Subdivision Urban</b>				
PC78: 1	E38.2 Objectives (10)(d) & E38.3 Policy (31)	Support	Fire and Emergency support the inclusion of objectives and policies which seeks to ensure that subdivision is provided where sites can be serviced by water supply infrastructure with sufficient capacity. Fire and Emergency interprets this to include adequate water supply for firefighting responses.	No amendments sought
PC78: 2	E38.2 Objective (10)(e) & E38.3 Policy (32)	Support	Fire and Emergency support the avoidance of subdivision in areas subject to transport infrastructure constraints that does not comply with minimum site sizes. This will assist in avoiding emergency response delays.	No amendments sought

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PC79: 11	E38.8.1.2 Access to rear sites	<b>Oppose in part</b>	<p>Fire and Emergency support that reference is made to consideration of fire emergency vehicle access. Bringing these controls to the attention of plan users (i.e. developers) early on in the resource consent process means they can incorporate the NZBC requirements early on in their design.</p> <p>However, given the gaps within the Building Code, Fire and Emergency request that the AUP provides adequate standards for emergency responses.</p> <p>To respond to emergencies, Fire and Emergency must be able to access rear sites. The proposed minimum formed widths, minimum vertical clearance and maximum gradient do not provide for this.</p>	<p>Amend minimum formed width for 1 rear site and 2-5 rear sites to 4.0m.</p> <p>Amend maximum gradient across all number of rear sites to 1 in 6.</p> <p>Amend minimum vertical clearance from buildings or structures to 4.0m.</p> <p>Make reference to the Firefighting Operations Emergency Vehicle Access Guide in Note 1.</p>
PC78: 3	<p>Standards – Restricted Discretionary Activities</p> <p><b>E38.8.2.8 Subdivision of sites in areas identified on the planning maps as being subject to the Infrastructure – Combined Wastewater Network Control or the Infrastructure – Water and/or Wastewater Constraints Control.</b></p> <p>(1) Applications must be accompanied by a technical report prepared by a suitably qualified and experienced person.</p> <p>(2) The technical report must demonstrate that infrastructure and servicing can be achieved.</p>	<b>Support in part</b>	<p>Fire and Emergency strongly support the provisions relating to the Infrastructure - Water Constraints Control. The Control recognises the limitations of Council's existing and planned infrastructure capacity. Technical assessments that demonstrate suitability of the development should show how firefighting water supply (either through reticulation or an alternative supply) accords with the Firefighting Water Supplies Code of Practice.</p>	<p>(2) The technical report must demonstrate that infrastructure and servicing can be achieved.</p> <p><u>Note: For sites subject to the infrastructure – Water Constraints Control this includes demonstrating sufficient water supply and pressure for firefighting in accordance with SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</u></p> <p><u>Adequate water for firefighting is included in Te Ture ā-Rohe Whakaroto Wai me te Pae Kōtuitui Wai Para 2015 Water Supply and Wastewater Network Bylaw 2015. The bylaw provides for Watercare to refuse a connection to the water supply if the connection may detrimentally affect its ability to supply water at the volume and/or pressure needed for firefighting.</u></p>
PC78: 4	<p>Assessment criteria – All controlled activities in Table E38.4.2</p> <p>E38.11.2 (2)(c)</p> <p>(c) whether there is appropriate provision made for infrastructure including;</p> <p>(ii) whether provision is made for infrastructure including creation of common areas over parts of the parent site that require access by more than one site within the subdivision; and</p> <p>(iii) Whether appropriate management of effects of stormwater has been provided;</p> <p>(iv) refer to Policies E38.3(1), (6), (19) to (23).</p>	<b>Support in part</b>	<p>Fire and Emergency support subdivision being supported by suitable infrastructure. This includes the infrastructure associated with Fire and Emergency operations.</p>	<p>(c) whether there is appropriate provision made for infrastructure including;</p> <p>(ii) whether provision is made for infrastructure including <u>adequate water for firefighting, emergency responder access, and</u> creation of common areas over parts of the parent site that require access by more than one site within the subdivision; <del>and</del></p> <p><u>Note: For sites subject to the infrastructure – Water Constraints Control this includes demonstrating sufficient water supply and pressure for firefighting in accordance with SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</u></p> <p><u>Adequate water for firefighting is included in Te Ture ā-Rohe Whakaroto Wai me te Pae Kōtuitui Wai Para 2015 Water Supply and Wastewater Network Bylaw 2015. The bylaw provides for Watercare to refuse a connection to the water supply if the connection may detrimentally affect its</u></p>

ID	Provision	Support / oppose	Submission	Requested amendment
				<p><u>ability to supply water at the volume and/or pressure needed for firefighting.</u></p> <p>(iii) Whether appropriate management of effects of stormwater has been provided;</p> <p>(iv) refer to Policies E38.3(1), (6), (19) to (23).</p>
PC78: 5	Matters of discretion & assessment criteria – restricted discretionary activities E38.12.1(11) & E38.12.2(11)	<b>Support</b>	Fire and Emergency strongly support the Water Supplies Code of Practice being an assessment criterion for subdivision in areas identified as being subject to the Infrastructure – Water Constraints Control. Fire and Emergency consider that ‘sufficient water supply and access to water supplies’ includes the supply and pressure as well as emergency responder access. Where alternative water supplies are provided on site this reinforces the need for amendments to the transport provisions to provide for emergency access.	
<b>Chapter H Zones</b>				
<b>H3A Residential – Low Density Residential Zone Chapter</b>				
PC78: 6	Low Density Residential Zone Objective and Policy framework (H3A.2 and H3A.3)	<b>Support in part</b>	<p>Overall, Fire and Emergency support the objective and policy framework.</p> <p>Fire and Emergency recognise that A1 incorporates the objectives in clause 6 of Schedule 3A of the RMA. Fire and Emergency support this objective insofar that it requires Council to provide for a well-functioning urban environment that meets the day-to-day needs of residents and enables all people and communities to provide for their health and safety, now and into the future. This would include provision of an adequate firefighting water supply and adequate emergency access and egress in the event of an emergency.</p> <p>In addition, the reference to avoiding natural hazards supports Fire and Emergency’s function insofar that it helps avoid emergency situations.</p> <p>Fire and Emergency request that references to ‘drinking water’ are expanded to also consider firefighting water supply requirements to reflect the importance of firefighting water for the health and safety of residents.</p>	<p>H3A.3.(12)</p> <p>Require dwellings to be provided with access to safe and reliable drinking water, <u>adequate water for firefighting</u>, wastewater and stormwater disposal services.</p>
PC78: 7	Activity table – H3A Emergency services adjoining an arterial road: Discretionary	<b>Support in part</b>	<p>Fire and Emergency support an activity for emergency service facilities being listed as an activity in zones. 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.</p> <p>Fire and Emergency request that emergency service facilities are included as a permitted activity. In addition, fire stations have specific requirements with relation to setback distances and vehicle crossings. Fire and Emergency request that emergency service facilities are exempt from these standards.</p>	Amend emergency services to be a permitted activity exempt from standards including yards, vehicle crossings etc.

ID	Provision	Support / oppose	Submission	Requested amendment
PC78: 8	H3A.6.14 Outdoor living space	<b>Support in part</b>	<p>Fire and Emergency support the provision of an outdoor living space on the premise that while not directly intended, may provide access for emergency services and space for emergency egress.</p> <p>As above, 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 deigned and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent 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 H3A.6.14 directing plan users to the requirements of the NZBC.</p>	<p><u>Advice note:</u>  <u>Site layout 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>
PC78: 9	H3A.6.17 Rainwater tanks	<b>Support</b>	<p>Fire and Emergency support the enablement of rainwater tank installation as this can assist in reducing demand on the reticulated water supply and provide local resilience in droughts.</p>	No amendments sought.
PC78: 10	H3A.8.2 Assessment criteria (9) for two or more dwellings on a site	<b>Support in part</b>	<p>Fire and Emergency support H3A.8.2(9) insofar that it provides Council the ability to assess whether a development provides clear, convenient and safe access links for all modes of transport within a site.</p> <p>Fire and Emergency request that a matter of discretion is included to consider the ability for emergency services to access a site.</p>	<p>(e) whether buildings <u>and site design</u> <del>create positive frontages that</del> contribute <u>positively</u> to the visual amenity and safety of public streets, public open spaces, and private vehicle and pedestrian accessways by:</p> <ol style="list-style-type: none"> <li>i. having clearly defined fronts that provide passive surveillance from windows and balconies whilst not impacting on privacy.</li> <li>ii. maximising doors, windows and balconies over all levels on the front façades.</li> <li>iii. maximising the number of dwellings that directly front, align and orientate to public streets and private accessways (vehicle and pedestrian).</li> <li>iv. ground level dwellings closest to the street to each have direct and clearly defined pedestrian access from the street in preference to a single building entrance.</li> </ol> <p><u>v. Providing efficient and effective access for emergency responders.</u></p>
PC78: 11	H3A.8.12 (10)	<b>Support</b>	<p>Fire and Emergency strongly support the Water Supplies Code of Practice being an assessment criterion for developments containing more than one dwelling per site in areas identified as being subject to the Infrastructure – Water Constraints Control. Fire and Emergency consider that ‘sufficient water supply and access to water supplies’ includes the supply and pressure as well as emergency responder access. Where alternative water supplies are provided on site this reinforces the need for amendments to the transport provisions to provide for emergency access.</p>	No amendments sought



ID	Provision	Support / oppose	Submission	Requested amendment
<b>H5 Residential – Mixed Housing Urban Zone</b>				
PC78: 12	H5.2. Objectives and H5.3 Policies	<b>Support in part</b>	<p>In general, Fire and Emergency support the objectives and policies framework.</p> <p>Fire and Emergency recognise that A1 incorporates the objectives in clause 6 of Schedule 3A of the RMA. Fire and Emergency support this objective insofar that it requires Council to provide for a well-functioning urban environment that meets the day-to-day needs of residents and enables all people and communities to provide for their health and safety, now and into the future. This would include provision of an adequate firefighting water supply and adequate emergency access and egress in the event of an emergency.</p> <p>The framework also seeks to enable density where there is capacity within existing and planned infrastructure. This is important in ensuring resilient communities are provided for.</p> <p>Fire and Emergency request that references to 'drinking water' are expanded to also consider firefighting water supply requirements to reflect the importance of firefighting water for the health and safety of residents.</p>	<i>H5.3 (12) Require dwellings to be provided with access to safe and reliable drinking water, <u>adequate water for firefighting</u>, wastewater and stormwater disposal services.</i>
PC78: 13	H5.4.1 Activity Table (A23) Emergency services adjoining an arterial road: Discretionary	<b>Support in part</b>	<p>Fire and Emergency support an activity for emergency service facilities being listed as an activity in zones. 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.</p> <p>Fire and Emergency request that emergency service facilities are included as a permitted activity. In addition, fire stations have specific requirements with relation to setback distances and vehicle crossings. Fire and Emergency request that emergency service facilities are exempt from these standards.</p>	Amend emergency services to be a permitted activity exempt from standards including yards, vehicle crossings etc.
PC78: 14	H5.6.8 Yards	<b>Support in part</b>	<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>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 Rule 14G.2.4 directing plan users to the requirements of the NZBC.</p>	<p><u>Advice note:</u></p> <p><u>Building setback 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>

ID	Provision	Support / oppose	Submission	Requested amendment
PC78: 15	H5.6.14 Outdoor living space	<b>Support in part</b>	<p>Fire and Emergency support the provision of an outdoor living space on the premise that while not directly intended, may provide access for emergency services and space for emergency egress.</p> <p>As above, 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 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 H3A.6.14 directing plan users to the requirements of the NZBC.</p>	<p><u>Advice note:</u>  <u>Site layout 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>
PC78: 16	H5.6.20 Safety and privacy buffer from private pedestrian and vehicle accessways	<b>Support</b>	<p>Fire and Emergency support the provision of buffers for pedestrian and vehicle accessways. While not directly intended to, they can act to provide a buffer between potential fire sources and emergency responder accessways.</p>	<p>No amendments sought.</p>
PC78: 17	H5.8.2 (1) Assessment criteria	<b>Support in part</b>	<p>Fire and Emergency request explicit reference to emergency responder access needs and firefighting water supply.</p>	<p>(a) infrastructure and servicing:</p> <p>(i) Whether there is adequate capacity in the existing stormwater and public reticulated water supply and wastewater network to service the proposed development, <u>including for firefighting.</u></p> <p>(ii) Where adequate network capacity is not available, whether adequate mitigation is proposed.</p> <p>(b) building intensity, scale, location, form and appearance:</p> <p>(i) whether the intensity and scale of the activity, the building location, form and appearance is of a high-quality and compatible with the character and residential amenity provided for within the zone and compatible with the surrounding residential area.</p> <p>(c) traffic:</p> <p>(i) whether the activity avoids or mitigates high levels of additional nonresidential traffic on local roads.</p> <p>(d) location and design of parking and access (including pedestrian <u>and emergency</u> access) and parking (if provided):</p> <p>(i) whether adequate parking and access is provided or required.</p>

ID	Provision	Support / oppose	Submission	Requested amendment
				<p>(ii) whether car parking and accessways are integrated into the overall design of the development</p> <p>(iii) whether parking is located away from street frontages and screened from the street by buildings or landscaping</p> <p>(iv) Whether safe, well-lit pedestrian access is provided</p> <p><u>Note: see SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice for information on alternative firefighting water supplies.</u></p> <p><u>Adequate water for firefighting is included in Te Ture ā-Rohe Whakaroto Wai me te Pae Kōtuitui Wai Para 2015 Water Supply and Wastewater Network Bylaw 2015. The bylaw provides for Watercare to refuse a connection to the water supply if the connection may detrimentally affect its ability to supply water at the volume and/or pressure needed for firefighting.</u></p>
PC78: 18	H5.8.2 (4) Assessment criteria – height infringements	<b>Support in part</b>	In higher buildings, specific attention needs to be placed on maintaining water pressure. Fire and Emergency seek that this is included as a new matter for discretion where relevant when the maximum height is exceeded.	<u>(ea) the provision of effective and efficient emergency response servicing</u>
PC78: 19	H5.8.2 (21)	<b>Support</b>	Fire and Emergency strongly support the Water Supplies Code of Practice being an assessment criterion for developments containing more than one dwelling per site in areas identified as being subject to the Infrastructure – Water Constraints Control. Fire and Emergency consider that ‘sufficient water supply and access to water supplies’ includes the supply and pressure as well as emergency responder access. Where alternative water supplies are provided on site this reinforces the need for amendments to the transport provisions to provide for emergency access.	No amendments sought
<b>H6 Residential – Terrace Housing and Apartment Buildings Zone</b>				
PC78: 20	H6.2 and H6.3 Objectives and policies framework	<b>Support in part</b>	<p>In general, Fire and Emergency support the objectives and policies framework.</p> <p>Fire and Emergency recognise that A1 incorporates the objectives in clause 6 of Schedule 3A of the RMA. Fire and Emergency support this objective insofar that it requires Council to provide for a well-functioning urban environment that meets the day-to-day needs of residents and enables all people and communities to provide for their health and safety, now and into the future. This would include provision of an adequate firefighting water supply and adequate emergency access and egress in the event of an emergency.</p> <p>The framework also seeks to enable density where there is capacity within existing and planned infrastructure. This is important in ensuring resilient communities are provided for. In addition, there is also reference to development contributing to an environment that is resilient to the effects of climate change.</p>	<u>H6.3 (12) Require dwellings to be provided with access to safe and reliable drinking water, adequate water for firefighting, wastewater and stormwater disposal services.</u>

ID	Provision	Support / oppose	Submission	Requested amendment
			Fire and Emergency request that references to 'drinking water' are expanded to also consider firefighting water supply requirements to reflect the importance of firefighting water for the health and safety of residents.	
PC78: 21	Activity Table A24 Emergency services adjoining an arterial road: Discretionary	<b>Support in part</b>	<p>Fire and Emergency support an activity for emergency service facilities being listed as an activity in zones. 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.</p> <p>Fire and Emergency request that emergency service facilities are included as a permitted activity. In addition, fire stations have specific requirements with relation to setback distances and vehicle crossings. Fire and Emergency request that emergency service facilities are exempt from these standards.</p>	Amend emergency services to be a permitted activity exempt from standards including yards, vehicle crossings etc.
PC78: 22	Standard H6.6.9 Yards	<b>Support in part</b>	<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>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 Rule 14G.2.4 directing plan users to the requirements of the NZBC.</p>	<p><u>Advice note:</u></p> <p><u>Site layout requirements including building setbacks 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>
PC78: 23	Standard H6.6.15 Outdoor living space	<b>Support in part</b>	<p>Fire and Emergency support the provision of an outdoor living space on the premise that while not directly intended, it may provide access for emergency services and space for emergency egress.</p> <p>As above, 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 deigned and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent so that Council are able to assess this design to ensure compliance with the RMA.</p>	<p><u>Advice note:</u></p> <p><u>Site layout 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>

ID	Provision	Support / oppose	Submission	Requested amendment
			Fire and Emergency therefore request that, as a minimum, an advice note is included with H3A.6.14 directing plan users to the requirements of the NZBC.	
PC78: 24	H6.6.18 Rainwater tanks	<b>Support</b>	Fire and Emergency support the enablement of rainwater tank installation as this can assist in reducing demand on the reticulated water supply and provide local resilience to droughts.	No amendments sought.
PC78: 25	H6.6.21 Safety and privacy buffer to private pedestrian and vehicle accessways	<b>Support</b>	Fire and Emergency support the provision of buffers for pedestrian and vehicle accessways. While not directly intended to, they can act to provide a buffer between potential fire sources and emergency responder accessways.	No amendments sought.
PC78: 26	H6.8 Assessment – restricted discretionary activities H6.8.1 (2) Matters of discretion (four or more dwellings)	<b>Support in part</b>	It is essential that matters of discretion where four or more dwellings are proposed per site include Fire and Emergency matters given these intensification proposals are at higher risk.	(2) (ib) the extent to which the functional, day to day needs of residents are provided for in terms of:  A. the size and dimensions of living areas relative to the likely occupancy levels of the dwellings;  B. internal storage;  C. residential waste management, including the kerbside and/or on-site capacity for residential waste management.  <u>D. provision for emergency response services on site</u>
PC78: 27	H6.8.1 (3) Matters of discretion (integrated residential development)	<b>Support in part</b>	Fire and Emergency request explicit reference to emergency responder access needs.	(3) (iii) location and design of parking and access (including pedestrian <u>and emergency responder access</u> ) and parking (if provided); and
PC78: 28	H6.8.2 (1) Assessment criteria	<b>Support in part</b>	Fire and Emergency request explicit reference to emergency responder access needs and firefighting water supply requirements.	(a) infrastructure and servicing  (i) Whether there is adequate capacity in the existing stormwater and public reticulated water supply and wastewater network to service the proposed development, <u>including adequate water for firefighting.</u>  (ii) Where adequate network capacity is not available, whether adequate mitigation is proposed.  <u>Note: see SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice for information on alternative firefighting water supplies.</u>  ...  (d) location and design of parking and access (including pedestrian <u>and emergency responder access</u> ) and parking (if provided):  (i) whether adequate parking and access is provided or required.

ID	Provision	Support / oppose	Submission	Requested amendment
				<p>(ii) whether car parking and accessways are integrated into the overall design of the development</p> <p>(iii) whether parking is located away from street frontages and screened from the street by buildings or landscaping</p> <p>(iv) Whether safe, well-lit pedestrian access is provided</p>
PC78: 29	H6.8.2 (2) Assessment criteria		It is essential that assessment criteria where four or more dwellings are proposed per site include Fire and Emergency matters given these intensification proposals are at higher risk.	<p>(j) infrastructure and servicing</p> <p>(i) Whether there is adequate capacity in the existing stormwater and public reticulated water supply and wastewater network to service the proposed development, <u>including adequate water for firefighting.</u></p> <p>(ii) Where adequate network capacity is not available, whether adequate mitigation is proposed.</p> <p><u>Note: see SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice for information on alternative firefighting water supplies.</u></p> <p><u>Adequate water for firefighting is included in Te Ture ā-Rohe Whakaroto Wai me te Pae Kōtuitui Wai Para 2015 Water Supply and Wastewater Network Bylaw 2015. The bylaw provides for Watercare to refuse a connection to the water supply if the connection may detrimentally affect its ability to supply water at the volume and/or pressure needed for firefighting.</u></p>
PC78: 30	H6.8.2 (21) Assessment criteria	<b>Support</b>	Fire and Emergency strongly support the Water Supplies Code of Practice being an assessment criterion for developments containing more than one dwelling per site in areas identified as being subject to the Infrastructure – Water Constraints Control. Fire and Emergency consider that ‘sufficient water supply and access to water supplies’ includes the supply and pressure as well as emergency responder access. Where alternative water supplies are provided on site this reinforces the need for amendments to the transport provisions to provide for emergency access.	No amendments sought
<b>H8 Business – City Centre Zone</b>				
PC78: 31	Standard H8.6.34 Through-site links	<b>Support</b>	Fire and Emergency support the intention of through-site links for their indirect benefit for on-site emergency responder access.	No amendments sought
PC78: 32	H8.8.1 (6) Matters of discretion	<b>Support in part</b>	As detailed in the submission, infringements with relation to height and setbacks can have implications on emergency servicing. Fire and Emergency seek that this is included as a new matter for discretion.	<p>(6) <i>infringement of general building height, building in relation to boundary, streetscape improvement and landscaping, maximum tower dimension, setback from the street and tower separation in special height area, and building setback from boundaries standards:</i></p> <p>(a) <i>effects of additional building bulk and scale on neighbouring sites, streets and public open spaces</i></p>

ID	Provision	Support / oppose	Submission	Requested amendment
				<p>(sunlight and daylight access, dominance, visual amenity, and landscape character);</p> <p>(b) consistency with the existing and planned built future form and character of the area/zone; including enabling well-designed buildings which have a human scale podium and slender towers above to maximise sunlight, daylight and outlook, or where towers are not possible, buildings should be well-designed and complement the streetscape and skyline; and</p> <p>(c) site specific characteristics;</p> <p><u>(d) the provision of effective and efficient emergency responder servicing</u></p>

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