

Jim Stabback  
Tumu Whakarae Chief Executive  
Te Kaunihera o Tāmaki Makaurau Auckland Council

9<sup>th</sup> May 2022

Tēnā koe Jim,

Significant reforms planned and underway, in relation to growth, resource management, and transport, is changing our working landscape. Fire and Emergency NZ is writing to all Territorial Authorities across Aotearoa to highlight our interest in working more closely with them as they navigate these matters.

I would like to acknowledge the positive engagement we have had, specifically over the last 18 months with Auckland Council and its CCOs, on a number of planning and regulatory work related to growth across Tāmaki Makaurau. I wish to continue to strengthen our strategic partnership, and early engagement as council and its CCOs work to deliver the Auckland Plan 2050 outcomes, and give effect to the National Policy Statement for Urban Development, and other regulatory reforms, such as the Resource Management (Enabling Housing Supply and Other Matters) Act 2021.

Key matters of interest for Fire and Emergency in Tāmaki Makaurau are:

- ensuring new development, including infill development, is adequately serviced by firefighting water supply
- ensuring emergency services appliances and staff can adequately access both built and natural environments across the region in the event of an emergency
- maintaining and developing our property estate (e.g. fire stations) in strategic locations and at appropriate times to enable us to continue to meet the demands and expectations of communities as they grow and change
- working closely with elected officials, council and local boards, to foster community risk awareness, risk reduction and greater community resilience.

## Context

The Fire and Emergency New Zealand Act 2017 amalgamated urban and rural fire services and broadened the mandate of Fire and Emergency. The number of incidents we respond to has grown, as has the range of incident types<sup>1</sup>.

Fire and Emergency NZ attends an average of 23,396<sup>2</sup> incidents across Tāmaki Makaurau per year, this includes an average of:

- 4,724 fires
- 3,920 medical emergencies
- 2,008 vehicle accidents
- 1,558 rescues and public assists<sup>3</sup>.

<sup>1</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>2</sup> Average 2017-2021

<sup>3</sup> Rate of change 2017-2021

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 us as an organisation.

I respect that for some time Auckland Council has been working to understand the impacts and requirements of the NSP-UD. Fire and Emergency staff have been working with council staff to ensure that our views are considered in the development of planning work to address some of these impacts. We have also engaged in the refresh of multiple bylaws that are likely to impact our services, including Te Ture ā-Rohe Whakaroto Waime te Pae Kōtuitui Wai Para 2015 Water Supply and Wastewater Network Bylaw 2015.

Other areas, however, where we would like to grow our work with council, to ensure appropriate consideration is given to Fire and Emergency's operational and property requirements, include:

- increasing urban development densities, and any resulting zone changes
- anticipated changes to house typologies with more multi-storey residential buildings likely,
- changes that limit the situations where additional housing will require a resource consent process.

We welcome the opportunity to engage more with council in the refresh of its growth strategy and development of future spatial plans, structure plans, plan changes and bylaws.

### Firefighting water supply

The primary objective of Fire and Emergency New Zealand 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 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 Tāmaki Makaurau water is sourced from council's 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 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 (Code of Practice)<sup>4</sup>. The Code of Practice is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access for Fire and Emergency to operate effectively and efficiently in an emergency.

Te Ture ā-Rohe Whakaroto Waime te Pae Kōtuitui Wai Para 2015 Water Supply and Wastewater Network Bylaw 2015, updated in November 2021, includes reference to the Code of Practice.

There appears, however, to be a disconnect between different regulatory processes used by council, specifically, resource consents process, building consents process and bylaw enforcement, in ensuring adequate water supply to new developments.

Fire and Emergency considers that structure planning and staging programmes to align with infrastructure upgrades will be essential to ensure that urban development does not occur out of sequence with the delivery of key strategic infrastructure (network extensions or upgrades), such as water supply. Emergency service providers such as Fire and Emergency need to be part of these city-wide infrastructure processes through direct engagement. This is both to enable Fire and Emergency to anticipate urban change and to plan our own activities in response, and to have influence over the local implementation of government direction through NPS-UD and other related legislative changes.

<sup>4</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>

To manage this, Fire and Emergency considers that all subsequent subdivision and development should be subject to development standards within the unitary plan requiring all applicants to demonstrate 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.

As council manages water resources into the future, I request that Fire and Emergency be included as a key partner in the implementation of council's recently adopted Water Strategy. Actions associated with the strategic shifts of sustainable allocation and equitable access, water security, integrated land use and planning, and pooling knowledge, are of most interest to us.

### Emergency services access

Fire and Emergency requires adequate access to new developments, associated structures, and the natural environment to ensure that we can respond in emergencies.

In regard to the natural environment Fire and Emergency staff have engaged with council staff to ensure our views are considered in changes to the Regional Parks Management Plan, and proposed Freedom Camping in Vehicles bylaw 2021.

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. These changes 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.

Adequate access to both the source of emergency (fire or other) and a firefighting water supply is essential to efficient and effective response. The requirements for firefighting access are set out in the Code of Practice and further detailed in Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021). This document is attached to this letter as **Attachment 1** and has been provided to council staff in multiple pieces of feedback including the planning team to support their investigation on a proposed plan change to address the removal of minimal carparks and pedestrian only access development.

In general, the key access requirements include specific roading and access widths, and surface and gradients to support the operational requirements of Fire and Emergency appliances. This includes, but is not limited to the following:

- The minimum roading and carriageway widths should not be less than 4m. This width is required for firefighters to efficiently work around the fire appliance to access hoses and pumps.
- A clear passageway / vehicle crossing of no less than 3.5m wide should be provided as site entrances, internal entrances and between buildings.
- The maximum negotiable gradient is 1:5, but in general the roading gradient should not exceed 16%.
- The height clearance along accessways (for example trees, hanging cables and eaves) must exceed 4m.

Importantly, Fire and Emergency must 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 building, so firefighters can reach the fire with water. Refer Appendix B of Fire and Emergency's 'Designer's guide' that sets out compliant site layout examples.

It is noted that under Clause C5.3 of the Building Code, buildings must be provided with access for fire appliances to a hard standing from which there is an unobstructed path to the building within 20m of:

- (a) the firefighter access into the building, and
- (b) the inlets to automatic fire sprinkler system or fire hydrant systems (where these are installed).

This is to enable firefighters to get into the building and to move freely around their vehicles.

The minimum building setbacks from boundaries and between buildings in the Medium Density Residential Standards are relevant here, as are Building Code requirements for multi-storey buildings with elevators and internal access. It is important that council require some form of emergency service access suitable for Fire and Emergency personnel to access buildings in an emergency (i.e. Fire and Emergency must be able to physically get to the door with their equipment to fight a kitchen fire). This includes having adequate access to rear dwellings on long sites where hose run lengths become an issue. If firefighters cannot physically get water to a fire, they cannot help. This also ensures 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.

I acknowledge again the work that council's planning team are undertaking in relation to a potential plan change to mitigate the impacts of the removal of minimal carparks and pedestrian only access development, and the engagement they have undertaken with emergency responders to consider our needs. I request that your planning team continues to engage early with Fire and Emergency as it implements the NPS-UD and other reforms associated with the RMA such as the Enabling Housing Supply and Other Matters Act 2021

I understand that council staff are considering including Fire and Emergency access requirements within council's Urban Design Guidelines, however these guidelines are non-statutory and therefore may have minimal impact on development design. Fire and Emergency, however, is always happy to engage directly with developers to discuss appropriate alternative means of emergency service access for specific developments.

Fire and Emergency is already encountering new development where emergency vehicle access has been challenged. Issues with emergency vehicle access in these locations can be caused by narrow roads / laneways, higher density typologies and a lack of off-street parking available resulting in cars parking along both sides of already narrow residential streets. Implications for emergency services include on-road obstructions, meaning emergency vehicles have difficulty or are unable to manoeuvre, as well as an inability to access buildings and locate fire hydrants in an emergency. Inadequate parking lengths along frontages also have been encountered generally from vehicles parking over footpaths in driveways, blocking access. Where garages are provided, these are often not being used for vehicles, increasing demand for on street parking.

Fire and Emergency staff are engaging with Auckland Transport on its Parking Strategy, along with changes to roading corridors across the city, and other roading treatments that may affect our response. Support from Auckland Council, however, in advocating for or elevating the voice of Fire and Emergency would be appreciated. A coordinated effort between land-use planning, transport and roading infrastructure and emergency response is required to ensure community outcomes identified in the Auckland Plan 2050 are achieved.

### **Demand on emergency services**

Fire and Emergency has a Statement of Performance Expectations<sup>5</sup> which sets out targets to delivering timely and effective fire response and suppression services as well as other services<sup>6</sup>.

Community need for our services has been increasing, thereby increasing our presence on the roads and need for fast and efficient access to incidents across Tāmaki Makaurau. The rate of change per year since 2017 shows:

- structure fire incidents increasing by 1%
- medical incidents increasing by 3%
- vehicle accidents increasing by 3%<sup>7</sup>.

Urban growth and intensification coupled with environmental and demographic changes across our communities is likely to result in a greater demand on emergency services and consequently can affect response times if not managed.

<sup>5</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>6</sup> Fire and Emergency Act 2017 sections 10-12

<sup>7</sup> FY 2017/18 to 2020/21

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 response times so that they can efficiently and effectively 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 Resource Management Act 1991 and therefore does not have the ability to designate land for the purposes of fire stations.

Provisions within the rules of the unitary plan therefore may be the best way to facilitate the development of any new fire stations 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 changes that seek to re-zone large portions of land to facilitate development.

### Ongoing engagement

The rapid growth of Tāmaki Makaurau and subsequent rate of change in our operating environment will continue to put pressure on Fire and Emergency's traditional service delivery models and will require firefighters to develop a broader range of skills and capabilities through investment in education, training, and ongoing professional development.

Fire and Emergency will continue to build its capability and specialised expertise, and will continue to invest in property, fleet, and information and communications technologies to ensure we are equipped to respond.

To do this effectively we need to work collaboratively with our partners towards shared goals and results, that being, the protection of the health, safety and wellbeing of communities. Strengthening partnerships is identified within the Regional Plan for Te Hiku, as we perceive significant benefits to the community if Fire and Emergency and council work effectively together to positively influence legislation, policy and best practice to help support emergency response work.

We will seek to continue to work in partnership with council and its CCOs on matters that have the potential to influence our operational and property requirements and achieving improved safety outcomes for communities across Tāmaki Makaurau. I would appreciate it if you could share this letter with relevant departments across council, to raise their awareness of our areas of interests so they may consider them against their forward work programmes. In the event of a matter arising where council considers that Fire and Emergency may be affected or have an interest, I would appreciate it if a relevant member of staff could contact me directly or Antonia Butler, Auckland Strategic Advisor. We will ensure that the matter is given the appropriate action.

Ngā mihi,

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Ron Devlin

Fire and Emergency New Zealand, Region Manager – Te Hiku