

Form 5

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

Clause 6 of Schedule 1, Resource Management Act 1991

To: Opotiki District Council (the Council)

Name of submitter: New Zealand Fire Service Commission (the Commission)

This is a submission on: The Proposed Opotiki District Plan (PODP)

The Commission could not gain an advantage in trade competition through this submission.

The specific provisions of the PODP that this submissions relates to are:

The provisions that relate to the Commission's statutory functions and responsibilities including:

- fire safety and fire prevention;
- water supply and access to this supply;
- property access for emergency response;
- noise from emergency activities and associated training;
- the operation of fire stations; and
- the establishment of new fire stations.

The Commission's submission is:

The Commission is the governing body that controls the NZ Fire Service (NZFS). The Commission is also the National Rural Fire Authority (NRFA). The Fire Service Act 1975 (FSA) and the Forest and Rural Fires Act 1977, establish the governance, management, and operational arrangements for these organisations. The NZFS trains for, and responds to, structural fires and other emergencies, whereas the NRFA supports local Rural Fire Authorities (RFA) in training for, and responding to, rural wildfires.

It is a matter of prime importance for the Commission to take an active and co-ordinating role in the promotion of fire safety in New Zealand, through reducing the incidence of fire and the attendant risk to life and property; and through seeking unity and completeness of fire safety law and practice.¹ The Commission is required to provide the New Zealand Government with a Statement of Intent (SOI) that sets out how the Commission will achieve its statutory responsibilities.² The SOI outlines the overall outcomes the Commission seeks to achieve, including the promotion of fire safety, fire prevention activities, extinguishing fires in a timely manner and other emergency responses.

The PODP provides an opportunity, in relation to fire hazards and other emergencies, to better facilitate the health, safety and wellbeing of people and communities by appropriately providing for

¹ Section 20 of the FSA.

² New Zealand Fire Service Commission Statement of Intent, 2014 – 2018, Presented to the House of Representatives pursuant to Section 149 of the Crown Entities Act 2004.

fire station facilities, fire safety, fire prevention, fire extinction, and associated training that enables the Commission to meet its responsibility of providing an efficient and effective emergency service.³

It is essential that the Commission is able to meet its responsibility of providing efficient and effective emergency services to all New Zealanders, in order to avoid, remedy or mitigate the adverse effects of fire and other emergencies. To do so, the Commission requires:

- the ability to construct and operate fire stations in locations that will enable reasonable response times to fires and other emergencies;
- the ability to undertake training activities for the firefighters within the region;
- adequate water supply for firefighting activities; and
- adequate access to properties for fire appliances to ensure that the NZFS can respond to emergencies.

The ability to construct and operate fire stations in locations that will enable reasonable response times to fires and other emergencies

The SOI is supported by an annual Statement of Performance Expectations (SPE). The 2016 - 2017 SPE contains a commitment by the Commission to the New Zealand Government for the following response times to emergencies in urban areas:

- structural fire incidents (volunteer fire stations, such as the Opotiki Fire Station) within 11 minutes for 90% of the time;
- motor vehicle accidents within 30 minutes for 90% of the time; and
- medical emergencies within 11 minutes for 90% of the time (volunteer stations).

These response time commitments are a key determinant for the location of fire stations and, as such, fire stations must be able to be located throughout the urban and rural environment so that the NZFS is able attend an emergency within a primary response area in an effective and timely manner. Further, communities have an expectation that NZFS will respond swiftly to a fire emergency in order to protect lives and property and therefore avoid or mitigate the adverse effects of fire.

There is currently one volunteer fire station within Opotiki District, being the Opotiki volunteer fire station located at 34 King Street. The fire station site is located in the Mixed Activity Zone in the PODP. There is also a rural volunteer facility in Waihau Bay.

The Commission considers that the PODP needs to make provision for activities on the current fire station site, and for new fire stations, within the objectives, policies and rules of the PODP in order to achieve the purpose of the Resource Management Act 1991 (RMA).

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 the Commission 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 PODP are the best way to facilitate the development of any new fire stations within the district as urban development progresses.

The effects of a fire station can be largely anticipated and, in the most part, do not differ to the effects of a number of activities that may be anticipated through rural and urban environments. In terms of height requirements, fire stations will generally be single storied buildings of approximately 8 to 9 metres in height. Hose drying towers may also be required in some cases, which can be around 12 to 15 metres in height. Setback distances from the road frontages are also required to

³ In accordance with the sustainable management purpose of the Resource Management Act 1991 (Section 5).

accommodate the stopping of appliances outside the appliance bays, but off the road reserve area. Vehicle movements to and from fire stations sites differ depending on whether a fire station accommodates volunteer or career firefighters, and on the number of emergencies and are limited to fire appliances movements and firefighter private vehicles.

Noise will also be produced on site by operational activities such as cleaning and maintaining equipment, training activities and noise produced by sirens. Training may take place anywhere between 7:00am and 10:00pm. Cleaning and maintenance will generally take place during the day; however, it can take place after a call out which can occur at any time. Generally, the Commission has assessed that a fire station will be capable of meeting the standards set out in NZS 6802:2008 (Table 3 - Guideline residential upper noise limits), with the exclusion of noise created by emergency sirens. Sirens play a crucial role in facilitating a prompt emergency response and provide a critical backup to the pager system. The role of sirens is more important than ever given the uncertainties around the imminent disestablishment of Spark/Chorus' pager network. A siren can be the most effect means of communication in alerting volunteers, these volunteers generally live in close proximity to the fire stations. Sirens also provide assurance to the people who have made the call that help is on the way. The Commission seeks an exemption from the noise rules for sirens in the PODP.

A new fire station could be required in many of the zones in the PODP, and the Commission seeks that the PODP includes rules that provide for new emergency service facilities throughout the district. In this regard, the Commission considers that the section 32 reports fail to give adequate consideration to the role of emergency services play in achieving the purpose of the RMA. Further, the PODP does not contemplate emergency services in any zone and as such it is considered that the PODP fails to achieve the purpose of the RMA.

The ability to undertake firefighting training activities

In order to ensure an efficient and effective emergency response firefighter training is an essential activity undertaken by the NZFS. Firefighter training may include live fire training and equipment training both on and off site. The SPE confirms a commitment to the Government that all firefighters achieve a certain level of training. The Commission seeks that the PODP clearly provides firefighter training activities throughout the district.

Adequate water supply and access for firefighting activities.

The provision for adequate water supply, especially in rural and isolated areas (including those areas served by Rural Fire Authorities) is critical. It is important to the Commission that any new subdivision or land use that does not have access to a reticulated water supply has access to an adequate firefighting water supply of some kind, which can be accessed by the NZFS. This essential emergency supply will provide for the health and safety and wellbeing of people and the wider community and therefore achieves the purpose of the RMA.

The Commission supports the inclusion of firefighting water supply and access provisions in the PODP, by reference to the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice), in order to enable the Commission to meet its obligations under the FSA by more protecting lives, property and the surrounding environment. The Commission considers that the best way to provide a consistent approach to mitigating the actual and potential effects of fire across the district is to include specific standards in the PODP.

The Code of Practice is a non-mandatory New Zealand Standard that sets out the requirements for firefighting water and access. The Code of Practice ensures a consistent approach throughout New Zealand and enables the NZFS to operate effectively and efficiently in a fire emergency. The Code of Practice provides techniques to define a sufficient firefighting water supply that may vary according to the circumstances and is based on an assessment of the minimum water supplies needed to fight a fire and to limit fire spread according to each different building's fire hazards. The

firefighting water supply required to address the fire hazard may be established by use of tables within the Code, or by calculation. The Code of Practice is written to provide flexibility as to how the firefighting water supplies can be provided.

Adequate access to both the source of a fire and a firefighting water supply is also essential to the efficient operation of the NZFS. The requirements for firefighting access are set out in the Code of Practice and further detailed in NZFS's 'Emergency Vehicle Access Guidelines' (May 2015). For instance, a fire appliance requires, as a minimum, access which is 4 metres in width and 4 metres in height clearance, with a maximum gradient of 1 in 5 (and accompanying transition ramps). The Commission therefore seeks that these requirements are met for new developments and subdivision in circumstances where fire appliance access to a property is necessary in order to efficiently and effectively extinguish a fire.

Appendix A to this submission sets out the Commission submission in detail, including the amendments sought by the Commission to specific provisions of the PODP, and the reasons for the amendments.

The Commission wishes to acknowledge the opportunity to comment on an earlier draft of the PODP and also welcomes the opportunity to discuss, or provide further clarification, in relation to its submission.

The Commission seeks the following decision from the local authority:

Amend the PODP to provide for the safety and wellbeing of people and communities in the Opotiki District by making the changes set out in Appendix A to this submission, including any further or consequential relief that may be necessary to address the matters raised in this submission.

The Commission wishes to be heard in support of its submission.

If others make a similar submission the Commission will consider presenting a joint case with them at a hearing.

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**(Signature of person authorised to sign
on behalf of the New Zealand Fire
Service Commission)**

Date: 18 November 2016

Appendix A: New Zealand Fire Service Commission Submission on the Proposed Opotiki District Plan

The following table sets out the decisions sought by the Commission, including specific amendments to provisions of the PODP. These amendments are shown as [red](#).

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
Chapter 2 Residential Zone			
Objective 2.2.2, Policy 2.2.2.1 and Policy 2.2.2.2	Support in part	The Commission supports Objective 2.2.2 Policy 2.2.2.1 and Policy 2.2.2.2 to the extent that these provisions anticipate non-residential activities in the Residential Zone, but considers that the provisions focus on the management of effects, rather than an outcome that provides clear direction in relation to the appropriateness of some non-residential activities in the Residential Zone, for instance emergency services that have functional and operational need to be located in close proximity to the communities they serve. The amendments sought to these provisions better achieve the purpose of the RMA by providing for the health and safety of people and communities.	<p>Amend Objective 2.2.2 and add a new Policy as follows:</p> <p>“OBJECTIVE</p> <p>2.2.2 To recognise and provide for non-residential activities that contribute to the health, safety and wellbeing of the community while managing their manage potential adverse effects of non-residential activities to ensure that the activities complement the amenity values of the District’s residential areas.</p> <p>POLICIES</p> <p>2.2.2.x Provide for non-residential activities that contribute to the health, safety and wellbeing of the community.”</p>
Rule 2.3.2 Permitted Activities	Oppose	The Commission opposes the range of activities listed in 2.3.2.1 as permitted activities to the extent that no provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).	<p>Amend Rule 2.3.2.1 to include the following as a permitted activity:</p> <p>“x. Emergency services training and management activities.”</p>
Rule 2.3.3 Controlled Activities	Oppose	The Commission opposes the Rules in Chapter 2 to the extent that no provision is made for emergency service facilities. These facilities/activities would instead default to non-complying activities under Rule 2.3.6. The Commission considers that the default non-complying activity status is overly restrictive and inappropriate and notes that the Section 32 Reports fail to contemplate the locational needs, or benefits derived from,	<p>Amend Rule 2.3.3.1 to include the following as a controlled activity:</p> <p>“x. Emergency service facilities.”</p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<p>emergency service facilities/activities. The Commission therefore seeks the inclusion of a new controlled activity to provide for emergency services in the Residential Zone for the following reasons:</p> <ul style="list-style-type: none"> • fire stations must 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 by being able to respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies; • the actual or potential effects of fire stations are minor and can be adequately predicted and subsequently managed by conditions of consent and the matters for control in 2.4.1; • controlled activity status better implement the Objectives and Policies of the PODP (as amended by this submission) and gives effect to Policy EI 4B(a)(ii) of the operative Regional Policy Statement for Bay of Plenty (RPS) by recognising and providing for emergency services as essential services; and • controlled activity status better achieves the purpose of the RMA and better enables the Commission to meet its statutory obligations. 	
2.6.1 Site Requirements (2.6.1.2 Height)	Support in part	<p>The Commission generally supports the Site Requirements Standard in 2.6.1, but seeks the inclusion of a specific exemption for hose drying towers in order to appropriately provide for the operational requirements of the NZFS. A fire station building is single storey and is typically able to achieve the height standards in a district plan. However, some fire stations also include a hose drying tower of between 12 to 15 metres in height. The Commission considers that the inclusion of an exemption for such structures better provides for the health and safety of the community by enabling the efficient functioning of the NZFS and is consistent with the typical height of similar network utility structures.</p>	<p>Amend Standard 2.6.1.2 to include the following: “This Standard does not apply to hose drying towers up to 15m associated with emergency service facilities.”</p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
2.6.4 Noise and Glare	Support in part	The Commission generally supports Standard 2.6.4 on the basis that fire stations can be designed and operated in a manner that generally achieves the noise and glare standards. However, the NZFS is not likely to achieve this standard in situations where sirens are used for the purposes of emergency response and training. The Commission therefore seeks the inclusion of an exemption for sirens associated with emergency services in Standard 2.6.4.1. The proposed exemption, appropriately provides for the operational requirements of the NZFS and enables the Commission to meet its statutory obligations in a manner that provides for the on-going health and safety of people and communities.	Amend Standard 2.6.4.1 to include the following: <u>“These standards do not apply to sirens used by emergency services.”</u>
2.6.5 Parking and Loading	Support in part	The Commission generally supports the carparking standards in Standard 2.5.6.1, but seeks the inclusion of carparking requirements for emergency service facilities. The standard sought is consistent with the approach taken in the recent Christchurch Replacement District Plan decision and reflects the NZFS Fire Station Design Guidelines.	Amend Standard 2.6.5.1 to include the following additional standard: <u>“Emergency service facilities _____ 1 space per emergency service vehicle bay”</u>
2.6.11 Potable Water	Oppose	<p>The Commission opposes Standard 2.6.11.1 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 and be consistent with NZFS’s ‘Emergency Vehicle Access Guidelines’ (May 2015) in order to:</p> <ul style="list-style-type: none"> • ensure adequate access for fire appliances is provided where a building is a substantial distance from the nearest hydrant; • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; • better implement the Objectives and Policies of the PODP (as amended by this submission) and give effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p>Amend Standard 2.6.11 as follows:</p> <p>“2.6.11 POTABLE WATER</p> <p>2.6.11.1 Potable Water Supply</p> <p>A potable water supply ...</p> <p><u>2.6.11.x Firefighting Water Supply</u></p> <ol style="list-style-type: none"> <u>1. New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> <u>2. Where a building is located more than 135m from the nearest road that has reticulated water supply (including hydrants) access shall have a minimum formed width of 4m, a height clearance of 4.0m and a maximum gradient of 1 in 5 (with minimum 4.0m transition ramps of 1 in 8).”</u> <p>As a consequence, amend 2.5.1.3 to include the following: <u>“Firefighting water supply</u></p> <ol style="list-style-type: none"> <u>1. Mitigation of the potential adverse effects of fire, including fire spread.”</u>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
2.6.12 Vehicle Entrance Designs	Support in part	<p>Subject to the relief sought in relation to Standard 2.6.11, the Commission generally supports the design requirements for vehicle entrances. However, the Commission is concerned that the Designs in Appendix 4 may prescribe maximum widths that would not be able to accommodate a fire appliance.</p> <p>By way of background, for fire appliances to access an emergency, adequate access width, height and gradient is necessary. A 95th percentile pumping appliance has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5, accompanied by a 4.0 m long 1:15 transition grade.</p> <p>In order to provide for the ability to access a fire, or other, emergency the commission seeks an amendment to the Standard to ensure adequate clearance is provided.</p> <p>Further, the Commission supports the Standard to the extent that it is understood that the Designs in Appendix 4 only apply to residential and commercial developments and would not inhibit the access design necessary to accommodate the operational requirements of the NZFS at a fire station site.</p>	<p>Amend Standard 2.6.12 as follows:</p> <p>“2.6.12.1 Residential and commercial vehicle entrance designs shall comply with Appendix 4, <u>except where additional access width is necessary to provide access for emergency service vehicles in accordance with Standard 2.6.11.x(2).</u>”</p>
Chapter 3 Town Centre Zone			
Objective 3.2.1, Policy 3.2.1.1, Policy 3.2.1.2, Policy 3.2.1.3 and Policy 3.2.1.4	Support in part	<p>The Commission supports Objective 3.2.1 and its associated Policies to the extent that the Objective recognises the Town Centre as the focal point for community activities (on the assumption that fire stations fall within the definition of ‘community activities’). However, the Commission considers that the associated Policies fail to implement Objective 3.2.1 because the focus on the management of effects, rather than providing clear direction in relation to the enabling community activities in the Town Centre Zone. The Commission seeks the inclusion of a further Policy to provide this direction and to better achieve the purpose of the RMA by providing for the health and safety of people and communities.</p>	<p>Amend the Policies that implement Objective 3.2.1 to include the following:</p> <p><u>“3.2.1.x Enable a range of retail, commercial, cultural and community activities in the Town Centre.”</u></p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
Rule 3.3.2 Permitted Activities	Oppose	<p>The Commission opposes the range of activities listed in 3.3.2.1 as permitted activities to the extent that no specific provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).</p>	<p>Amend Rule 3.3.2.1 to include the following as a permitted activity: <u>“x. Emergency services training and management activities.”</u></p>
Rule 3.3.2 Permitted Activities	Oppose	<p>The Commission opposes the Rules in Chapter 3 to the extent that no specific provision is made for emergency service facilities. These facilities/activities would instead either default to non-complying activities under Rule 3.3.6; be considered as ‘community activities’ under Rule 3.3.5 or be considered under Rule 3.3.2.1(14) where the Zone Standards are met.</p> <p>The Commission considers that discretionary or non-complying activities status is overly restrictive and inappropriate and notes that the Section 32 Reports fail to contemplate the locational needs, or benefits derived from, emergency service facilities/activities. The Commission is also concerned that the Rules are not clear in terms of how a new fire station might be assessed. The Commission therefore seeks the inclusion of a new permitted activity to provide for emergency services in the Town Centre Zone for the following reasons:</p> <ul style="list-style-type: none"> • fire stations must 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 by being able to respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies; • the actual or potential effects of fire stations are minor and of a similar, or lesser, scale to those anticipated for many of the permitted activities included in Rule 3.3.2; • permitted activity status better implements the Objectives and Policies of the PODP (as amended by this submission) and gives effect to Policy EI 4B(a)(ii) of the operative RPS by recognising and providing for emergency services as essential services; and • permitted activity status better achieves the purpose of the RMA and better enables the Commission to meet its statutory obligations. 	<p>Amend Rule 3.2.3.1 to include the following as a controlled activity: <u>“x. Emergency service facilities.”</u></p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
3.6.1 Site Requirements (3.6.1.2 Height)	Support in part	The Commission generally supports the Site Requirements Standard in 3.6.1, but seeks the inclusion of a specific exemption for hose drying towers in order to appropriately provide for the operational requirements of the NZFS. A fire station building is single storey and is typically able to achieve the height standards in a district plan. However, some fire stations also include a hose drying tower of between 12 to 15 metres in height. The Commission considers that the inclusion of an exemption for such structures better provides for the health and safety of the community by enabling the efficient functioning of the NZFS and is consistent with the typical height of similar network utility structures.	Amend Standard 3.6.1.2 to include the following: “This Standard does not apply to hose drying towers up to 15m associated with emergency service facilities.”
3.6.4 Noise and Glare	Support in part	The Commission generally supports Standard 3.6.4 on the basis that fire stations can be designed and operated in a manner that generally achieves the noise and glare standards. However, the NZFS is not likely to achieve this standard in situations where sirens and call-out sirens are used for the purposes of emergency response and training. The Commission therefore seeks the inclusion of an exemption for sirens associated with emergency services in Standard 3.6.4.1. The proposed exemption, appropriately provides for the operational requirements of the NZFS and enables the Commission to meet its statutory obligations in a manner that provides for the on-going health and safety of people and communities.	Amend Standard 3.6.4.1 to include the following: “These standards do not apply to sirens used by emergency services.”
3.6.6 Parking and Loading	Support in part	The Commission generally supports the carparking standards in Standard 3.6.6.1, but seeks the inclusion of carparking requirements for emergency service facilities, as has been done for police stations. The standard sought is consistent with the approach taken in the recent Christchurch Replacement District Plan decision and reflects the NZFS Fire Station Design Guidelines.	Amend Standard 3.6.6.1 to include the following additional standard: “Emergency service facilities 1 space per emergency service vehicle bay”
3.6.13 Potable Water	Oppose	The Commission opposes Standard 3.6.13.1 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 in order to: <ul style="list-style-type: none"> • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; 	Amend Standard 3.6.11 as follows: “3.6.11 POTABLE WATER 3.6.11.1 Potable Water Supply A potable water supply ... 3.6.11.x Firefighting Water Supply 1. New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.”

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<ul style="list-style-type: none"> • better implement the Objectives and Policies of the PODP (as amended by this submission) and give effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	As a consequence, amend 3.5.1.8 to include the following: <u>“Firefighting water supply</u> <u>1. Mitigation of the potential adverse effects of fire, including fire spread.”</u>
3.6.14 Vehicle Entrance Designs	Support	The Commission supports Standard 3.6.14 to the extent that it is understood that the Designs in Appendix 4 only apply to residential and commercial developments and would not inhibit the access design necessary to accommodate the operational requirements of the NZFS at a fire station site.	Subject to Standard 3.6.14 not applying to fire stations, retain Standard 3.6.14 as notified.
Chapter 4 Mixed Activity Zone			
Objective 4.2.2 and Policy 4.2.2.1	Oppose	The Commission opposed Objective 4.2.2 and Policy 4.2.2.1 to the extent that these provision fail to contemplate uses other than residential and commercial activities in the Mixed Activity Zone. While the existing Opotiki Voluntary Fire Station is located in this Zone, the plan provisions and accompanying Section 32 Evaluation Report fail to contemplate the ongoing development and operation of a fire station at this site or at other sites throughout the Mixed Activity Zone. The Commission seeks amendments to the provisions to acknowledge that activities other than residential and commercial activity are appropriately located in the Mixed Activity Zone. In terms of emergency services it is considered that such amendments are necessary to achieve the purpose of the RMA by providing for the health and safety of people and communities. On the assumption that emergency services fall within the definition of ‘community activities’ it is suggested that this term could be used in the Objective and Policy.	Amend Objective 4.2.2 and Policy 4.2.2.1 as follows: “OBJECTIVE 4.2.2 To provide a mixture of Residential, Community and Commercial Activities within the zone. POLICIES 4.2.2.1 Enable a mix of Residential, Community and Commercial Activities to locate within the zone, whilst managing the effects on existing lawfully established activities.”
Rule 4.3.2 Permitted Activities	Oppose	The Commission opposes the range of activities listed in 4.3.2.1 as permitted activities to the extent that no specific provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).	Amend Rule 4.3.2.1 to include the following as a permitted activity: <u>“x. Emergency services training and management activities.”</u>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
Rule 4.3.2 Permitted Activities	Oppose	<p>The Commission opposes the Rules in Chapter 4 to the extent that no specific provision is made for emergency services. These facilities/activities (including any redevelopment of the existing Opotiki Fire Station) would instead either default to a non-complying activity under Rule 4.3.6 or be considered under Rule 4.3.2.1 where Zone Standards are met.</p> <p>The Commission considers that non-complying or restricted discretionary activity status is overly restrictive and inappropriate and notes that the Section 32 Evaluation fail to contemplate the locational needs, or benefits derived from, emergency services. The Commission is also concerned that the Rules are not clear in terms of how a new fire station might be assessed. The Commission therefore seeks the inclusion of a new permitted activity to provide for emergency services because:</p> <ul style="list-style-type: none"> • fire stations must 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 by being able to respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies; • the actual or potential effects of fire stations are minor and of a similar, or lesser, scale to those anticipated for many of the permitted activities included in Rule 4.3.2; • permitted activity status better implements the Objectives and Policies of the PODP (as amended by this submission) and gives effect to Policy EI 4B(a)(ii) of the RPS by recognising and providing for emergency services as essential services; and • permitted activity status better achieves the purpose of the RMA and better enables the Commission to meet its statutory obligations. 	<p>Amend Rule 4.3.2.1 to include the following as a permitted activity: <u>“x. Emergency service facilities.”</u></p>
4.6.1 Site Requirements (4.6.1.2 Height)	Support in part	<p>The Commission generally supports the Site Requirements Standard in 4.6.1, but seeks the inclusion of a specific exemption for hose drying towers in order to appropriately provide for the operational requirements of the NZFS. A fire station building is single storey and is typically able to achieve the height standards in a district plan. However, some fire stations also include a hose drying tower of between 12 to 15 metres in height (as is the case at the Opotiki Fire Station). The Commission considers that the inclusion of an exemption for such structures better provides for the health and safety of the community by enabling the efficient functioning of the NZFS and is consistent with the typical height of similar network utility structures.</p>	<p>Amend Standard 4.6.1.2 to include the following: <u>“This Standard does not apply to hose drying towers up to 15m associated with emergency service facilities.”</u></p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
4.6.4 Noise and Glare	Support in part	The Commission generally supports Standard 4.6.4 on the basis that fire stations can be designed and operated in a manner that generally achieves the noise and glare standards. However, the NZFS is not likely to achieve this standard in situations where sirens and call-out sirens are used for the purposes of emergency response and training. The Commission therefore seeks the inclusion of an exemption for sirens associated with emergency services in Standard 4.6.4.1. The proposed exemption, appropriately provides for the operational requirements of the NZFS and enables the Commission to meet its statutory obligations in a manner that provides for the on-going health and safety of people and communities.	Amend Standard 4.6.4.1 to include the following: <u>“These standards do not apply to sirens used by emergency services.”</u>
4.6.5 Parking and Access	Support in part	The Commission generally supports the carparking and access standards in Standard 4.6.5.1, but seeks the inclusion of carparking requirements for emergency service facilities, as has been done for police stations. The standard sought is consistent with the approach taken in the recent Christchurch Replacement District Plan decision and reflects the NZFS Fire Station Design Guidelines.	Amend Standard 4.6.5.1(1) to include the following additional standard: <u>“Emergency service facilities _____ 1 space per emergency service vehicle bay”</u>
4.6.10 Potable Water	Oppose	<p>The Commission opposes Standard 4.6.10.1 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 and be consistent with NZFS’s ‘Emergency Vehicle Access Guidelines’ (May 2015) in order to:</p> <ul style="list-style-type: none"> • ensure adequate access for fire appliances is provided where a building is a substantial distance from the nearest hydrant; • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; • better implement the Objectives and Policies of the PODP (as amended by this submission) and give effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p>Amend Standard 4.6.10 as follows:</p> <p>“4.6.10 POTABLE WATER</p> <p>4.6.10.1 Potable Water Supply</p> <p>A potable water supply ...</p> <p>4.6.10.x Firefighting Water Supply</p> <p><u>1. New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></p> <p><u>2. Where a building is located more than 135m from the nearest road that has reticulated water supply (including hydrants) access shall have a minimum formed width of 4m, a height clearance of 4.0m and a maximum gradient of 1 in 5 (with minimum 4.0m transition ramps of 1 in 8).”</u></p> <p>As a consequence, amend 4.5.1.4 to include the following:</p> <p><u>“Firefighting water supply</u></p> <p><u>1. Mitigation of the potential adverse effects of fire, including fire spread.”</u></p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
4.6.11 Vehicle Entrance Designs	Support in part	<p>Subject to the relief sought in relation to Standard 4.6.11, the Commission generally supports the design requirements for vehicle entrances. However, the Commission is concerned that the Designs in Appendix 4 may prescribe maximum widths that would not be able to accommodate a fire appliance.</p> <p>By way of background, for fire appliances to access an emergency, adequate access width, height and gradient is necessary. A 95th percentile pumping appliance has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5, accompanied by a 4.0 m long 1:15 transition grade.</p> <p>In order to provide for the ability to access a fire, or other, emergency the commission seeks an amendment to the Standard to ensure adequate clearance is provided.</p> <p>Further, the Commission supports the Standard to the extent that it is understood that the Designs in Appendix 4 only apply to residential and commercial developments and would not inhibit the access design necessary to accommodate the operational requirements of the NZFS at a fire station site.</p>	<p>Amend Standard 4.6.11 as follows:</p> <p>“4.6.11.1 Residential and commercial vehicle entrance designs shall comply with Appendix 4, <u>except where additional access width is necessary to provide access for emergency service vehicles in accordance with Standard 4.6.11.x(2).</u>”</p>
Chapter 5 Marine Services Zone			
Rule 5.3.2 Permitted Activities	Oppose	<p>The Commission opposes the range of activities listed in 5.3.2.1 as permitted activities to the extent that no provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).</p>	<p>Amend Rule 5.3.2.1 to include the following as a permitted activity:</p> <p><u>“x. Emergency services training and management activities.”</u></p>
5.5.11 Potable Water	Oppose	<p>The Commission opposes Standard 5.5.11 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 in order to:</p> <ul style="list-style-type: none"> • be consistent with the priority given to firefighting water supply in section 	<p>Amend Standard 5.5.11 as follows:</p> <p>“5.5.11 POTABLE WATER</p> <p>5.5.11.1 Potable Water Supply</p> <p>A potable water supply ...</p> <p><u>5.5.11.x Firefighting Water Supply</u></p> <p><u>1. New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply</u></p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		14(3) of the RMA; <ul style="list-style-type: none"> • better enable the Commission to achieve its statutory obligations under the FSA; • better implement the Objectives and Policies of the PODP (as amended by this submission) and give effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p>for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>As a consequence, amend 5.5.1.1 to include the following:</p> <p>“Firefighting water supply</p> <p>1. Mitigation of the potential adverse effects of fire, including fire spread.”</p>
Chapter 6 Industrial Zone			
Rule 6.3.2 Permitted Activities	Oppose	The Commission opposes the range of activities listed in 6.3.2.1 as permitted activities to the extent that no specific provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).	<p>Amend Rule 6.3.2.1 to include the following as a permitted activity:</p> <p>“x. Emergency services training and management activities.”</p>
Rule 6.3.2 Permitted Activities	Support in part	The Commission opposes the Rules in Chapter 6 to the extent that no specific provision is made for emergency service facilities. These facilities/activities would instead either default to a non-complying activity under Rule 6.3.6 or Rule 6.3.2.1 where Zone Standards are met. The Commission considers that non-complying or restricted discretionary activity status is overly restrictive and inappropriate and notes that the Section 32 Reports fail to contemplate the locational needs, or benefits derived from, emergency service facilities/activities. The Commission is also concerned that the Rules are not clear in terms of how a new fire station might be assessed. The Commission therefore seeks the inclusion of a new permitted activity to provide for emergency services in the Industrial Zone for the following reasons: <ul style="list-style-type: none"> • fire stations must 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 by being able to respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies; 	<p>Amend Rule 6.3.2.1 to include the following as a permitted activity:</p> <p>“x. Emergency service facilities.”</p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<ul style="list-style-type: none"> the actual or potential effects of fire stations are minor and of a similar, or lesser, scale to those anticipated for many of the permitted activities included in Rule 43.3.2; permitted activity status better implements the Objectives and Policies of the PODP and gives effect to Policy EI 4B(a)(ii) of the RPS by recognising and providing for emergency services as essential services; and permitted activity status better achieves the purpose of the RMA and better enables the Commission to meet its statutory obligations. 	
6.6.1 Site Requirements (6.6.1.2 Height)	Support in part	The Commission generally supports the Site Requirements Standard in 6.6.1, but seeks the inclusion of a specific exemption for hose drying towers in order to appropriately provide for the operational requirements of the NZFS. A fire station building is single storey and is typically able to achieve the height standards in a district plan. However, some fire stations also include a hose drying tower of between 12 to 15 metres in height (as is the case at the Opotiki Fire Station). The Commission considers that the inclusion of an exemption for such structures better provides for the health and safety of the community by enabling the efficient functioning of the NZFS and is consistent with the typical height of similar network utility structures.	Amend Standard 6.6.1.2 to include the following: <u>“This Standard does not apply to hose drying towers up to 15m associated with emergency service facilities.”</u>
6.6.4 Noise and Glare	Support in part	The Commission generally supports Standard 6.6.4 on the basis that fire stations can be designed and operated in a manner that generally achieves the noise and glare standards. The NZFS will typically achieve these Standards, but for the avoidance of doubt seeks the inclusion of an exemption for sirens associated with emergency services in Standard 6.6.4.1. The proposed exemption, appropriately provides for the operational requirements of the NZFS and enables the Commission to meet its statutory obligations in a manner that provides for the on-going health and safety of people and communities.	Amend Standard 6.6.4.1 to include the following: <u>“These standards do not apply to sirens used by emergency services.”</u>
6.6.5 Parking and Loading	Support in part	The Commission generally supports the parking and loading standards in Standard 6.6.5.1, but seeks the inclusion of carparking requirements for emergency service facilities, as has been done for police stations. The standard sought is consistent with the approach taken in the recent Christchurch Replacement District Plan decision and reflects the NZFS Fire Station Design Guidelines.	Amend Standard 6.6.5.1(1) to include the following additional standard: <u>“Emergency service facilities _____ 1 space per emergency service vehicle bay”</u>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
6.6.10 Potable Water	Oppose	<p>The Commission opposes Standard 6.6.10.1 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 and be consistent with NZFS's 'Emergency Vehicle Access Guidelines' (May 2015) in order to:</p> <ul style="list-style-type: none"> • ensure adequate access for fire appliances is provided where a building is a substantial distance from the nearest hydrant; • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; • better implement the Objectives and Policies of the PODP (as amended by this submission) and give effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p>Amend Standard 6.6.10 as follows:</p> <p>“6.6.10 POTABLE WATER</p> <p>6.6.10.1 Potable Water Supply</p> <p>A potable water supply ...</p> <p>6.6.10.x Firefighting Water Supply</p> <ol style="list-style-type: none"> 1. <u>New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> 2. <u>Where a building is located more than 135m from the nearest road that has reticulated water supply (including hydrants) access shall have a minimum formed width of 4m, a height clearance of 4.0m and a maximum gradient of 1 in 5 (with minimum 4.0m transition ramps of 1 in 8).”</u> <p>As a consequence, amend 6.5.1.3 to include the following:</p> <p><u>“Firefighting water supply</u></p> <ol style="list-style-type: none"> 1. <u>Mitigation of the potential adverse effects of fire, including fire spread.”</u>
6.6.11 Vehicle Entrance Designs	Support in part	<p>Subject to the relief sought in relation to Standard 6.6.11, the Commission generally supports the design requirements for vehicle entrances. However, the Commission is concerned that the Designs in Appendix 4 may prescribe maximum widths that would not be able to accommodate a fire appliance.</p> <p>By way of background, for fire appliances to access an emergency, adequate access width, height and gradient is necessary. A 95th percentile pumping appliance has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5, accompanied by a 4.0 m long 1:15 transition grade.</p> <p>In order to provide for the ability to access a fire, or other, emergency the commission seeks an amendment to the Standard to ensure adequate</p>	<p>Amend Standard 6.6.11 as follows:</p> <p>“6.6.11.1 Residential and commercial vehicle entrance designs shall comply with Appendix 4, <u>except where additional access width is necessary to provide access for emergency service vehicles in accordance with Standard 6.6.11.x(2).</u>”</p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<p>clearance is provided.</p> <p>Further, the Commission supports the Standard to the extent that it is understood that the Designs in Appendix 4 only apply to residential and commercial developments and would not inhibit the access design necessary to accommodate the operational requirements of the NZFS at a fire station site.</p>	
Chapter 7 Harbour Industrial Zone			
Rule 7.3.2 Permitted Activities	Oppose	<p>The Commission opposes the range of activities listed in 7.3.2.1 as permitted activities to the extent that no provision is made for emergency services training and management activities. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).</p>	<p>Amend Rule 7.3.2.1 to include the following as a permitted activity: <u>“x. Emergency services training and management activities.”</u></p>
7.5 Zone Standards	Oppose	<p>The Commission opposes the Standards in 7.5 to the extent that the Standards do not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 in order to:</p> <ul style="list-style-type: none"> • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; • better implement the Objectives and Policies of the PODP (as amended by this submission) and give effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p>Amend the Zone Standards in 7.5 to include the following additional Standard: “7.5.x <u>FIREFIGHTING WATER SUPPLY</u> <u>7.5.x.1 firefighting water supply</u> <u>1. New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.”</u></p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
Chapter 8 Rural Zone			
Rule 8.3.1 Permitted Activities	Oppose	The Commission opposes the range of activities listed in 8.3.1.1 as permitted activities to the extent that no specific provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the RMA and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).	Amend Rule 8.3.1.1 to include the following as a permitted activity: “ <u>x. Emergency services training and management activities.</u> ”
Rule 8.3.1 Permitted Activities	Oppose	The Commission opposes the Rules in Chapter 8 to the extent that no specific provision is made for emergency service facilities. These facilities/activities would instead default to non-complying activities under Rule 8.3.5 or be considered under Rule 8.3.1.1(18) where Zone Standards are met. The Commission considers that the default non-complying activity status and restricted discretionary activity status are overly restrictive and inappropriate and notes that the Section 32 Reports fail to contemplate the locational needs, or benefits derived from, emergency service facilities/activities. The Commission is also concerned that the Rules are not clear in terms of how a new fire station might be assessed. The Commission therefore seeks the inclusion of a new permitted activity to provide for emergency services in the Rural Zone for the following reasons: <ul style="list-style-type: none"> • fire stations must 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 by being able to respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies; • the actual or potential effects of fire stations are minor, particularly when compared to the potential effects of a number of permitted activities; • permitted activity status better gives effect to Policy EI 4B(a)(ii) of the RPS by recognising and providing for emergency services as essential services; and • permitted activity status better achieves the purpose of the RMA and better enables the Commission to meet its statutory obligations. 	Amend Rule 8.3.1.1 to include the following as a controlled activity: “ <u>x. Emergency service facilities.</u> ”

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
8.6.2 Height	Support in part	The Commission generally supports the height standard in 8.6.2, but seeks the inclusion of a specific exemption for hose drying towers in order to appropriately provide for the operational requirements of the NZFS. A fire station building is single storey and is typically able to achieve the height standards in a district plan. However, some fire stations also include a hose drying tower of between 12 to 15 metres in height. The Commission considers that the inclusion of an exemption for such structures better provides for the health and safety of the community by enabling the efficient functioning of the NZFS and is consistent with the typical height of similar network utility structures.	Amend Standard 8.6.2 as follows: “The maximum height for structures within the zone shall be 9m except for frost fans up to 12m in height <u>and hose drying towers up to 15m associated with emergency service facilities.</u> ”
8.6.4.4 Building Setback from Forestry	Support	The Commission supports the building setback in Standard 8.6.4.4 and considers that the Standard appropriately mitigates the risk and potential adverse effects of fire.	Retain Standard 8.6.4.4 as required.
8.6.7 Noise and Glare	Support in part	The Commission generally supports Standard 8.6.7 on the basis that fire stations can be designed and operated in a manner that generally achieves the noise and glare standards. However, the NZFS is not likely to achieve this standard in situations where sirens and call-out sirens are used for the purposes of emergency response and training. The Commission therefore seeks the inclusion of an exemption for sirens associated with emergency services in Standard 8.6.7.1. The proposed exemption, appropriately provides for the operational requirements of the NZFS and enables the Commission to meet its statutory obligations in a manner that provides for the on-going health and safety of people and communities.	Amend Standard 8.6.7.1 to include the following: “ <u>These standards do not apply to sirens used by emergency services.</u> ”
8.6.9 Parking and Access	Support in part	The Commission generally supports the carparking and loading standards in Standard 8.6.9.1, but seeks the inclusion of carparking requirements for emergency service facilities. The standard sought is consistent with the approach taken in the recent Christchurch Replacement District Plan decision and reflects the NZFS Fire Station Design Guidelines.	Amend Standard 8.6.9.1 to include the following additional standard: “ <u>Emergency service facilities 1 space per emergency service vehicle bay</u> ”
8.6.12 Water Supply	Oppose	The Commission opposes Standard 8.6.12 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 and be consistent with NZFS’s ‘Emergency Vehicle Access Guidelines’ (May 2015) in order to: <ul style="list-style-type: none"> ensure adequate access for fire appliances is provided where a building is a substantial distance from the nearest hydrant; 	Amend Standard 8.6.12 as follows: “ 8.6.12 WATER SUPPLY 8.6.12.1 A potable water supply ... 8.6.12.x Firefighting Water Supply <u>1. New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> ”

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<ul style="list-style-type: none"> • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; • better gives effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p><u>2. Where a building is located more than 135m from the nearest road that has reticulated water supply (including hydrants) access shall have a minimum formed width of 4m, a height clearance of 4.0m and a maximum gradient of 1 in 5 (with minimum 4.0m transition ramps of 1 in 8)."</u></p> <p>As a consequence, amend 8.5.1 to include the following: <u>"8.5.1.x Firefighting water supply</u> <u>1. Mitigation of the potential adverse effects of fire, including fire spread."</u></p>
Chapter 9 Coastal Zone			
Rule 9.3.2 Permitted Activities	Oppose	<p>The Commission opposes the range of activities listed in 9.3.2.1 as permitted activities to the extent that no provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).</p>	<p>Amend Rule 9.3.2.1 to include the following as a permitted activity: <u>"x. Emergency services training and management activities."</u></p>
Rule 9.3.3 Controlled Activities	Oppose	<p>The Commission opposes the Rules in Chapter 9 to the extent that no provision is made for emergency service facilities. These facilities/activities would instead either default to non-complying activities under Rule 9.3.6; be considered permitted under Rule 9.3.2.1(13) or be considered a discretionary 'community activity' under Rule 9.3.5.1(5).</p> <p>The Commission considers that the default non-complying activity status and discretionary activity status is overly restrictive and inappropriate and notes that the Section 32 Reports fail to contemplate the locational needs, or benefits derived from, emergency service facilities/activities. The Commission is also concerned that it is not immediately clear how a fire station may be considered under the proposed provisions. The Commission therefore seeks the inclusion of a new controlled activity to provide for emergency services in the Coastal Zone for the following reasons:</p> <ul style="list-style-type: none"> • fire stations must 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 	<p>Amend Rule 9.3.3.1 to include the following as a controlled activity: <u>"x. Emergency service facilities."</u></p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<p>and communities by being able to respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies;</p> <ul style="list-style-type: none"> • the actual or potential effects of fire stations are minor and can be adequately predicted and subsequently managed by conditions of consent and the matters for control in 9.4; • controlled activity status better gives effect to Policy EI 4B(a)(ii) of the RPS by recognising and providing for emergency services as essential services; and • controlled activity status better achieves the purpose of the RMA and better enables the Commission to meet its statutory obligations. 	
9.6.1 Site Requirements (9.6.1.2 Height)	Support in part	The Commission generally supports the Site Requirements Standard in 9.6.1, but seeks the inclusion of a specific exemption for hose drying towers in order to appropriately provide for the operational requirements of the NZFS. A fire station building is single storey and is typically able to achieve the height standards in a district plan. However, some fire stations also include a hose drying tower of between 12 to 15 metres in height. The Commission considers that the inclusion of an exemption for such structures better provides for the health and safety of the community by enabling the efficient functioning of the NZFS and is consistent with the typical height of similar network utility structures.	Amend Standard 9.6.1.2 to include the following: <u>“This Standard does not apply to hose drying towers up to 15m associated with emergency service facilities.”</u>
9.6.4 Noise and Glare	Support in part	The Commission generally supports Standard 9.6.4 on the basis that fire stations can be designed and operated in a manner that generally achieves the noise and glare standards. However, the NZFS is not likely to achieve this standard in situations where sirens and call-out sirens are used for the purposes of emergency response and training. The Commission therefore seeks the inclusion of an exemption for sirens associated with emergency services in Standard 9.6.4.1. The proposed exemption, appropriately provides for the operational requirements of the NZFS and enables the Commission to meet its statutory obligations in a manner that provides for the on-going health and safety of people and communities.	Amend Standard 9.6.4.1 to include the following: <u>“These standards do not apply to sirens used by emergency services.”</u>
9.6.5 Parking and Loading	Support in part	The Commission generally supports the parking and loading standards in Standard 9.5.6.1, but seeks the inclusion of carparking requirements for emergency service facilities. The standard sought is consistent with the approach taken in the recent Christchurch Replacement District Plan decision and reflects the NZFS Fire Station Design Guidelines.	Amend Standard 9.6.5.1 to include the following additional standard: <u>“Emergency service facilities _____ 1 space per emergency service vehicle bay”</u>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
9.6.6 Vehicle Entrance Designs	Support in part	<p>Subject to the relief sought in relation to Standard 9.6.11, the Commission generally supports the design requirements for vehicle entrances. However, the Commission is concerned that the Designs in Appendix 4 may prescribe maximum widths that would not be able to accommodate a fire appliance.</p> <p>By way of background, for fire appliances to access an emergency, adequate access width, height and gradient is necessary. A 95th percentile pumping appliance has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5, accompanied by a 4.0 m long 1:15 transition grade.</p> <p>In order to provide for the ability to access a fire, or other, emergency the commission seeks an amendment to the Standard to ensure adequate clearance is provided.</p> <p>Further, the Commission supports the Standard to the extent that it is understood that the Designs in Appendix 4 only apply to residential and commercial developments and would not inhibit the access design necessary to accommodate the operational requirements of the NZFS at a fire station site.</p>	<p>Amend Standard 9.6.6 as follows:</p> <p>“9.6.6.1 Residential and commercial vehicle entrance designs shall comply with Appendix 4, <u>except where additional access width is necessary to provide access for emergency service vehicles in accordance with Standard 9.6.11.x(2).</u>”</p>
9.6.11 Water Supply	Oppose	<p>The Commission opposes Standard 9.6.11 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 and be consistent with NZFS’s ‘Emergency Vehicle Access Guidelines’ (May 2015) in order to:</p> <ul style="list-style-type: none"> • ensure adequate access for fire appliances is provided where a building is a substantial distance from the nearest hydrant; • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations; • better gives effect to the RPS; and • achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing an adverse effect of relatively low probability but high consequence. 	<p>Amend Standard 9.6.11 as follows:</p> <p>“9.6.11 WATER SUPPLY</p> <p>9.6.11.1 A potable water supply ...</p> <p><u>9.6.11.x Firefighting Water Supply</u></p> <ol style="list-style-type: none"> <u>1. New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> <u>2. Where a building is located more than 135m from the nearest road that has reticulated water supply (including hydrants) access shall have a minimum formed width of 4m, a height clearance of 4.0m and a maximum gradient of 1 in 5 (with minimum 4.0m transition ramps of 1 in 8).</u>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
Chapter 10 Coastal Settlement Zone			
Policy 10.2.1.2	Support	The Commission supports Policy 10.2.1.2 on the basis that the Policy appropriately seeks to restrict development where adequate infrastructure (including firefighting water) is not available.	Retain Policy 10.2.1.2 as notified.
Rule 10.3.1 Permitted Activities	Oppose	The Commission opposes the range of activities listed in 10.3.1.1 as permitted activities to the extent that no provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).	Amend Rule 10.3.1.1 to include the following as a permitted activity: “ <u>x. Emergency services training and management activities.</u> ”
Rule 10.3.2 Controlled Activities	Oppose	<p>The Commission opposes the Rules in Chapter 10 to the extent that no specific provision is made for emergency service facilities. These facilities/activities would instead either default to non-complying activities under Rule 10.5.3 or be considered a discretionary ‘community activity’ under Rule 10.3.4.1(5).</p> <p>The Commission considers that the default non-complying activity status and discretionary activity status is overly restrictive and inappropriate and notes that the Section 32 Reports fail to contemplate the locational needs, or benefits derived from, emergency service facilities/activities. The Commission is also concerned that it is not immediately clear how a fire station may be considered under the proposed provisions. The Commission therefore seeks the inclusion of a new controlled activity to provide for emergency services in the Coastal Settlement Zone for the following reasons:</p> <ul style="list-style-type: none"> • fire stations must 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 by being able to respond to emergency call outs in a timely way, thus avoiding or mitigating the potential for adverse effects associated with fire hazard and other emergencies; • the actual or potential effects of fire stations are minor and can be adequately predicted and subsequently managed by conditions of consent and the matters for control in 10.4; • controlled activity status better gives effect to Policy EI 4B(a)(ii) of the RPS by recognising and providing for emergency services as essential 	Amend Rule 10.3.2.1 to include the following as a controlled activity: “ <u>x. Emergency service facilities.</u> ”

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<p>services; and</p> <ul style="list-style-type: none"> controlled activity status better achieves the purpose of the RMA and better enables the Commission to meet its statutory obligations. 	
10.6.1 Site Requirements (10.6.1.2 Height)	Support in part	The Commission generally supports the Site Requirements Standard in 10.6.1, but seeks the inclusion of a specific exemption for hose drying towers in order to appropriately provide for the operational requirements of the NZFS. A fire station building is single storey and is typically able to achieve the height standards in a district plan. However, some fire stations also include a hose drying tower of between 12 to 15 metres in height. The Commission considers that the inclusion of an exemption for such structures better provides for the health and safety of the community by enabling the efficient functioning of the NZFS and is consistent with the typical height of similar network utility structures.	Amend Standard 10.6.1.2 to include the following: <u>“This Standard does not apply to hose drying towers up to 15m associated with emergency service facilities.”</u>
10.6.4 Noise and Glare	Support in part	The Commission generally supports Standard 10.6.4 on the basis that fire stations can be designed and operated in a manner that generally achieves the noise and glare standards. However, the NZFS is not likely to achieve this standard in situations where sirens and call-out sirens are used for the purposes of emergency response and training. The Commission therefore seeks the inclusion of an exemption for sirens associated with emergency services in Standard 10.6.4.1. The proposed exemption, appropriately provides for the operational requirements of the NZFS and enables the Commission to meet its statutory obligations in a manner that provides for the on-going health and safety of people and communities.	Amend Standard 10.6.4.1 to include the following: <u>“These standards do not apply to sirens used by emergency services.”</u>
10.6.5 Parking and Loading	Support in part	The Commission generally supports the parking and loading standards in Standard 10.5.6.1, but seeks the inclusion of carparking requirements for emergency service facilities. The standard sought is consistent with the approach taken in the recent Christchurch Replacement District Plan decision and reflects the NZFS Fire Station Design Guidelines.	Amend Standard 10.6.5.1 to include the following additional standard: <u>“Emergency service facilities 1 space per emergency service vehicle bay”</u>
10.6.7.1 Access to Non-Residential Activities	Support in part	Subject to the relief sought in relation to Standard 10.6.9, the Commission generally the access standard for non-residential activities, but seeks to confirm that access is appropriate to enable emergency vehicles. By way of background, for fire appliances to access an emergency, adequate access width, height and gradient is necessary. A 95th percentile pumping appliance has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5, accompanied by a 4.0 m long 1:15 transition grade.	Amend Standard 10.6.7 as follows: “10.6.7.1 Access to any site shall be sufficient to allow two-way traffic flow. One point of entry and one exit or one combined entry/exit is required. Vehicle crossings shall meet the standard in Appendix 4, <u>except where additional access width is necessary to provide access for emergency service vehicles in accordance with Standard 10.6.9.x(2) or at fire station sites.</u> ”

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<p>In order to provide for the ability to access a fire, or other, emergency the commission seeks an amendment to the Standard to ensure adequate clearance is provided.</p>	
10.6.9 Water Supply	Oppose	<p>The Commission opposes Standard 10.6.9 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. The Commission seeks the inclusion of a new standard that requires new buildings (excluding accessory buildings that are not habitable) to comply with SNZ PAS 4509:2008 and be consistent with NZFS's 'Emergency Vehicle Access Guidelines' (May 2015) in order to:</p> <ul style="list-style-type: none"> • ensure adequate access for fire appliances is provided where a building is a substantial distance from the nearest hydrant; • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; • better gives effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p>Amend Standard 10.6.9 as follows: “10.6.9 WATER SUPPLY 10.6.9.1 A potable water supply ... 10.6.9.x Firefighting Water Supply 1. <u>New buildings (excluding accessory buildings that are not habitable) shall have sufficient water supply for firefighting in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> 2. <u>Where a building is located more than 135m from the nearest road that has reticulated water supply (including hydrants) access shall have a minimum formed width of 4m, a height clearance of 4.0m and a maximum gradient of 1 in 5 (with minimum 4.0m transition ramps of 1 in 8).</u>”</p>
10.6.11 Vehicle Entrance Designs	Support in part	<p>Subject to the relief sought in relation to Standard 10.6.9, the Commission generally supports the design requirements for vehicle entrances. However, the Commission is concerned that the Designs in Appendix 4 may prescribe maximum widths that would not be able to accommodate a fire appliance.</p> <p>By way of background, for fire appliances to access an emergency, adequate access width, height and gradient is necessary. A 95th percentile pumping appliance has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5, accompanied by a 4.0 m long 1:15 transition grade.</p> <p>In order to provide for the ability to access a fire, or other, emergency the commission seeks an amendment to the Standard to ensure adequate clearance is provided.</p>	<p>Amend Standard 10.6.11 as follows: “10.6.11.1 Residential and commercial vehicle entrance designs shall comply with Appendix 4, <u>except where additional access width is necessary to provide access for emergency service vehicles in accordance with Standard 10.6.9.x(2).</u>”</p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		Further, the Commission supports the Standard to the extent that it is understood that the Designs in Appendix 4 only apply to residential and commercial developments and would not inhibit the access design necessary to accommodate the operational requirements of the NZFS at a fire station site.	
Chapter 11 Ohiwa Harbour Zone			
Rule 11.3.2 Permitted Activities	Oppose	The Commission opposes the range of activities listed in 11.3.2.1 as permitted activities to the extent that no provision is made for emergency services training and management activities, in a similar way as it is for military training. The Commission seeks that the rules be expanded to similarly provide for emergency services training and management activities in order to better achieve the sustainable management purpose of the Act and better enable the Commission to achieve its statutory function by facilitating firefighting and emergency response (including training for such circumstances).	Amend Rule 11.3.2.1 to include the following as a permitted activity: “ <u>x. Emergency services training and management activities.</u> ”
11.7.8 Vehicle Entrance Designs	Support in part	Subject to the relief sought in relation to Standard 11.7.12, the Commission generally supports the design requirements for vehicle entrances. However, the Commission is concerned that the Designs in Appendix 4 may prescribe maximum widths that would not be able to accommodate a fire appliance. By way of background, for fire appliances to access an emergency, adequate access width, height and gradient is necessary. A 95th percentile pumping appliance has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5, accompanied by a 4.0 m long 1:15 transition grade. In order to provide for the ability to access a fire, or other, emergency the commission seeks an amendment to the Standard to ensure adequate clearance is provided.	Amend Standard 11.7.8 as follows: “11.7.8 Residential and commercial vehicle entrance designs shall comply with Appendix 4, <u>except where additional access width is necessary to provide access for emergency service vehicles in accordance with Standard 11.7.12.x(2).</u> ”

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
11.7.12 Water Supply	Support in part	<p>The Commission generally supports the water supply Standard 11.7.12, particularly because the standard includes a requirement to comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. It is considered that the inclusion of this standard:</p> <ul style="list-style-type: none"> • is consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; • better gives effect to the RPS; and • achieves the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. <p>That said, and consistent with the relief sought elsewhere in this submission, the Commission seeks amendments to the wording to ensure that the access component of the Code of Practice is also 'captured' in this standard in a manner that provides some clarity and is consistent with NZFS's 'Emergency Vehicle Access Guidelines' (May 2015).</p>	<p>Amend Standard 11.7.12 as follows:</p> <p>“11.7.12 WATER SUPPLY</p> <p>11.7.12.1 A potable water supply ...</p> <p>11.7.12.2 All new buildings shall have access to a water supply for for firefighting purposes in accordance with NZFSA Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. <u>Where the building is located more than 135m from the nearest road that has reticulated water supply (including hydrants) access shall have a minimum formed width of 4m, a height clearance of 4.0m and a maximum gradient of 1 in 5 (with minimum 4.0m transition ramps of 1 in 8).</u>”</p>
Chapter 15 Subdivision			
Policy 15.2.2.1	Support	The Commission supports Policy 15.2.2.1 on the basis that the Policy appropriately seeks to that services and roads (including roads for emergency access and firefighting water supplies) are provided to an appropriate standard.	Retain Policy 15.2.2.1 as notified.
15.3 Subdivision Status and Rule 15.4.5.	Support in part	The Commission generally supports the provisions in 15.3 and 15.4 but seeks that the rules and standards that apply to public works and utilities also explicitly apply to emergency services. Such an approach affords a consistent approach to all emergency services (for instance police, fire and ambulance), and is aligned with the enabling of other Crown activities, such as schools.	<p>Amend Row '4' of the Table in 15.3.4 as follows:</p> <p>“Lots for public utilities, public works, <u>emergency services</u>, reserves within the meaning of the Reserves Act 1977, in accordance with Rule 15.4.5.”</p> <p>Amend Rule 15.4.5 as follows:</p> <p>“LOTS FOR PUBLIC UTILITIES, PUBLIC WORKS, <u>EMERGENCY SERVICES</u>, AND FOR RESERVES AS</p>

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought						
			<p>STATED IN THE RESERVES ACT 1977</p> <p>15.4.5.1 The minimum standards for the zone shall not apply where the lots are created for the following purposes:</p> <ol style="list-style-type: none"> 1. Where land is required by a network utility operator. 2. Where land is required for a public <u>work or emergency service</u>. ... 						
<p>15.4.4 Access Requirements in the Residential, Mixed Activity, Rural, Ohiwa Harbour, Coastal, and Coastal Settlement Zones</p>	<p>Support in part</p>	<p>The Commission generally supports Standard 15.4.4 that sets out the access requirements in a number of zones. However, the Commission is concerned that the Standard may give rise to situations where access for emergency vehicles is compromised.</p> <p>For fire appliances to access an emergency, adequate access width, height and gradient is necessary. A 95th percentile pumping appliance has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5, accompanied by a 4.0 m long 1:15 transition grade.</p> <p>In order to provide for the ability to access a fire, or other, emergency the commission seeks amendments to the Standard to ensure adequate clearance is provided and to align with the relief sought elsewhere including notified Standard 15.5.5.1(7).</p>	<p>Amend Standard 15.4.4 as follows :</p> <p>“15.4.4.3 The minimum access width required for up to six lots shall be as follows:</p> <table border="0"> <tr> <td>1 lot</td> <td><u>34m (except where the access terminates less than 135m from the nearest road that has reticulated water supply (including hydrants))</u>”</td> </tr> <tr> <td>2 lots</td> <td>4m</td> </tr> <tr> <td>3-6 lots</td> <td>6m</td> </tr> </table> <p><u>15.4.4.x Accesses shall have a minimum height clearance of 4.0m and a maximum gradient of 1 in 5 (with minimum 4.0m transition ramps of 1 in 8) except where the access terminates less than 135m from the nearest road that has reticulated water supply (including hydrants).”</u></p>	1 lot	<u>34m (except where the access terminates less than 135m from the nearest road that has reticulated water supply (including hydrants))</u> ”	2 lots	4m	3-6 lots	6m
1 lot	<u>34m (except where the access terminates less than 135m from the nearest road that has reticulated water supply (including hydrants))</u> ”								
2 lots	4m								
3-6 lots	6m								
<p>15.5.5 Water, Stormwater and Sewage Disposal</p>	<p>Support in part</p>	<p>The Commission generally supports the Standards for Subdivision in 15.5 and particularly supports Standard 15.5.5.1(7) that requires provision to be made for a firefighting water supply in non-reticulated areas. The Commission seeks minor amendments to this Standard to align with the relief sought elsewhere in this submission.</p> <p>It is considered that the inclusion of this standard:</p> <ul style="list-style-type: none"> • is consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; 	<p>Amend Standard 15.5.5.1(7) as follows:</p> <p>“7. Where there is no reticulated water supply, <u>Provision shall be made for an adequate supply of water and access to water supplies for firefighting purposes in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. Compliance with this Code of Practice can typically be achieved through connection to a Council reticulated water supply.</u>”</p> <p>As a consequence, amend the criteria in 15.8.1 to include the following additional clause:</p>						

PODP Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		<ul style="list-style-type: none"> • better gives effect to the RPS; and • achieves the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p><u>“x. The potential adverse effects of fire, including fire spread.”</u></p>
Chapter 17 Network Utilities			
17.5.4 Potable Water	Oppose	<p>The Commission opposes Standard 17.5.4 to the extent that the Standard does not include a requirement to provide a firefighting water supply, and access to that water supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 in situations where a network utility building is ‘habitable’.</p> <p>The Commission seeks an amendment to the Standard to require habitable network utilities comply with SNZ PAS 4509:2008 in order to:</p> <ul style="list-style-type: none"> • be consistent with the priority given to firefighting water supply in section 14(3) of the RMA; • better enable the Commission to achieve its statutory obligations under the FSA; • better gives effect to the RPS; and • more appropriately achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence. 	<p>Amend Standard 17.5.4 as follows:</p> <p>“17.5.4 POTABLE WATER SUPPLY</p> <p>...</p> <p>17.5.4.2 All water supply systems shall be designed and constructed to:</p> <p>1. Adequately service each lot, or development, <u>including the provision of a firefighting water supply for any habitable building in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. ...”</u></p>
Chapter 19 Definitions			
‘Community activity’	Support in part	<p>The Commission generally supports the definition of ‘community activity’, on the assumption that the definition is intended to encompass emergency services. However, the Commission considers that, in order to provide greater clarity’ the definition should be expanded to make explicit mention of emergency services.</p>	<p>Amend the definition of ‘community activity’ as follows:</p> <p>“Means the use of land and buildings which provides social and cultural services and facilities for the general public in respect of <u>emergency services</u>, education, religion. Community facilities and leisure, may be associated with health clinics, schools, churches, probation and periodic detention centres.”</p>
‘Emergency services’	New	<p>The Commission seeks the inclusion of a new definition of ‘emergency service’ in order to provide greater clarity to plan users and to support the relief sought elsewhere in this submission. The definition proposed reflects the definition included in section 4 of the Civil Defence Emergency Management Act 2002 (CDEMA).</p>	<p>Include the following new definition of ‘emergency services’:</p> <p>“Emergency services</p> <p><u>Means the New Zealand Police, New Zealand Fire Service, National Rural Fire Authority, rural fire authorities, and hospital and health services.”</u></p>