

Waimakariri District Council
215 High Street
Rangiora
7400

28 September 2023

Dear Hearing Commissioner

Fire and Emergency New Zealand – Letter to be tabled for Proposed Waimakariri District Plan

Fire and Emergency New Zealand (Fire and Emergency) made a submission on the Proposed Waimakariri District Plan: *Whaitua Tākaro | Open Space and Recreation* and *Whatitua Taiwhenua | Rural Zones*. Fire and Emergency have opted not to attend the hearing scheduled to run from the 21 – 25 August 2023 and request that, in lieu of attendance, this letter be tabled for the Hearing Commissioners' consideration.

Fire and Emergency's Submission

Fire and Emergency made a number of recommended changes to the Proposed Waimakariri District Plan. The s42A report for the: *Whaitua Tākaro | Open Space and Recreation* and *Whatitua Taiwhenua | Rural Zones* has been released. The relief sought by Fire and Emergency and the officer's recommendations are outlined in Table 1 below.

Table 1. FENZ Submissions and officer's recommendation

Provision	Decision Requested	Officer Recommendation
NOSZ-R21	Amend activity status of Emergency Service Facilities from discretionary to restricted discretionary.	Reject - It is intended that the open space and recreation land remains predominantly for open space and recreation. The proposed amendment is not considered consistent with the purpose of the zone. Additionally, the matters of discretion are so broad as to effectively render the proposed amendment as a discretionary activity
SARZ-R18	Amend activity status of Emergency Service Facilities from discretionary to restricted discretionary.	Reject – The purpose of the SARZ zone is predominantly for a range of indoor and outdoor sport and active recreational activities. The proposed amendment is not considered consistent with the purpose of the zone. Additionally, the matters of discretion are so broad as to effectively render the proposed amendment as a discretionary activity
RURZ-O2	Retain as notified.	Accepted.

RURZ-P3	Amend the policy to include emergency service facilities.	Rejected – the reporting officer does not consider this inclusion to be necessary as there may be a need to located support services within the rural environment as a response to changes in demographics and population distribution.
GRUZ-R23	Amend the activity status of emergency service facilities from discretionary to permitted.	Accepted in part – The reporting officer has recommended that a restricted discretionary activity status may be more appropriate.
RLZ-R24	Seek a permitted activity status for Emergency Service Facilities.	Accepted in part - The reporting officer has recommended that a restricted discretionary activity status may be more appropriate.

As indicated in Table 1, Fire and Emergency sought several changes across the proposed provisions for the Whaitua Tākaro | Open Space and Recreation and Whatitua Taiwhenua | Rural Zones. Table 1 indicates that the requests made by Fire and Emergency were somewhat accepted by the reporting officer.

Fire and Emergency Response

Fire and Emergency make the following comment with respect to the amendments that were sought in our original submission.

With respect to NOSZ-R21 and SARZ-R18

Fire and Emergency understand that the purpose of the Open Space and Recreation Zones is generally to provide for open space and recreation areas to benefit the health and well-being of the people and community. Fire and Emergency seek that emergency service facilities are restricted discretionary activities in the Open Space and Recreation Zone. It is considered that a restricted discretionary status would provide a sufficient level of flexibility to construct and operate fire stations and the appropriate mitigation with the relevant matters of discretion provided by the Council.

With respect to GRUZ- R23 and RLZ-R24

Fire and Emergency partially support the recommendation by the reporting officer that the establishment of emergency service facilities is a restricted discretionary activity and not a discretionary activity. However, as abovementioned, Fire and Emergency seek that Emergency Service Facilities are permitted activities in the Rural Zone as Fire and Emergency require the ability to construct and operate fire stations in locations which enable reasonable response times for fire and other emergencies.

With respect to RURZ-P3

The inclusion of emergency service facilities is sought to be included within this policy as it is considered that these facilities directly support the health, safety and wellbeing of people living within the rural community.

Yours sincerely



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on behalf of

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