

# Submission on Notified Variation 1 & Variation 2 to Waimakariri District Plan

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## *Intensification Streamlined Planning Process (ISPP)*

**To:** Waimakariri District Council

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

**This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) to Waimakariri District Council (WDC) on Variation 1: Housing Intensification and Variation 2: Development Contributions.**

### **1.1 Context**

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency seek to:

- protect and preserve life
- prevent or limit injury
- prevent or limit damage to property and land, and
- prevent or limit damage to the environment<sup>1</sup>.

Fire and Emergency also has secondary functions including responding to medical events, rescues and public assists. With the wider mandate and changing nature of Fire and Emergency response, the volume of incidents that Fire and Emergency responds to has grown, as has the range of incident types.<sup>2</sup>

Over the last year, Fire and Emergency attended 829 incidents across the Waimakariri District. This included:

- 296 fires
- 104 medical emergencies
- 117 vehicle accidents
- 60 rescues and public assists
- 19 HAZMAT/Heat/Pressure/Electrical Hazard incidents

Fire and Emergency also faces broad challenges, such as the increasing frequency and severity of extreme weather events, increasing intensification of urban areas, and competing access to resources including water and transport infrastructure. These challenges make the environment Fire and Emergency operates in more complex and puts greater demands on Fire and Emergency as an organisation.

Territorial authorities have a role in ensuring that Fire and Emergency, as an emergency service provider, can continue to operate effectively and efficiently in a changing urban environment. This includes consideration and management of the actual and potential implications on emergency services when giving effect to the National Policy Statement on Urban Development 2020 (NPS-UD), and other regulatory reforms, such as the Resource Management (Enabling Housing Supply and Other Matters) Act 2021.

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

<sup>2</sup> There is an increasing need to respond to a wide range of non-fire emergencies, where Fire and Emergency often coordinate with and assist other emergency services. These include responding to motor vehicle accidents, medical call-outs, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea. In 2016/17, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined. (Source: NZ Fire Service Annual Report 2016/17)

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

This submission addresses matters relating to activities required to be undertaken to enable an effective emergency response and to provide for the health and safety of people and communities in Waimakariri District. Issues of particular interest and relevance to Fire and Emergency broadly include:

- ensuring new development, including infill development, is adequately serviced by firefighting water supply,
- ensuring emergency services appliances and Fire and Emergency personnel can adequately access both built and natural environments across the Waimakariri District in the event of an emergency, and
- maintaining and developing Fire and Emergency's property estate (e.g. fire stations) in strategic locations and at appropriate times to enable Fire and Emergency to continue to meet the demands and expectations of communities as they grow and change.

## 1.2 Firefighting water supply

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. To achieve this objective Fire and Emergency requires adequate water supply be available for firefighting activities.

It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing and that this water supply has adequate capacity and pressures available to service the future growth. Fire appliances carry a limited amount of water; therefore, it is necessary that adequate water capacity and pressure be available to Fire and Emergency to control or extinguish a fire. In the urban areas of Waimakariri, water is sourced from the reticulated water supply network however where reticulation is not available or limited (i.e. trickle fed), alternative water sources will be required. This may be in the form of dedicated water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

Adequate capacity and pressure for each development can be determined through the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice)<sup>3</sup>. The Code of Practice is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access in order for Fire and Emergency to operate effectively and efficiently in an emergency.

Fire and Emergency consider it essential that urban development does not occur out of sequence with the delivery of key strategic infrastructure (network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the Three Waters, in particular the water supply network.

Fire and Emergency consider that WDC will need to have sophisticated water network models where they do not already exist. This will assist WDC in identifying areas across the district where there is potential or known infrastructure capacity constraints and will enable WDC to manage the cumulative impacts of urban infill on the water supply network.

Water supply was not identified as a qualifying matter for WDC, with localised infrastructure constraints to be managed through Financial Contributions from developers for more than two dwellings or subdivision for more than two allotments. We are assuming that the water assessment that concluded that it was not needed as a qualifying matter included consideration of whether there was adequate supply and pressure as per the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. Having

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<sup>3</sup> The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 can be found here: <https://fireandemergency.nz/assets/Documents/Files/N5a-SNZPAS-4509-2008-NZFS-Firefighting-water-supplies-Code-of-practice.pdf>

sophisticated water network models will allow WDC to respond to projected capacity constraints sooner. While water supply may not be a qualifying matter now, Fire and Emergency request that WDC consider the cumulative impacts of intensification and the possibility that it may be needed as a qualifying matter in the future. We urge WDC to consider the approach taken by Auckland Council in Proposed Plan Change 78 to include a qualifying matter relating to water supply constraints.

Fire and Emergency consider that the District Council Financial Contribution Calculation Assessment must include infrastructure upgrades for the provision of sufficient water supply and pressure for firefighting in line with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. Without it, there will likely be development with inadequate firefighting water supply with potentially serious consequences for life and property. Particular consideration should be given to any higher-rise buildings and the network's capacity to maintain pressures. The remaining concern with using Financial Contributions is ensuring that required upgrades are operational/there is sufficient capacity available at the time the development is built. Fire and Emergency strongly support the rules that require developers to demonstrate that their development is able to achieve adequate capacity and pressure for water supply prior to resource consent being granted as is required under existing Proposed District Plan rule EI-R48. With this intensification placing greater demand on potable water supplies, the implementation of EI-R48 becomes even more essential.

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

### **1.3 Emergency services access**

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

Within the urban environment, the NPS-UD encourages higher residential densities, more varied housing typologies such as larger multi-unit development as well as a more compact urban form generally. Intensification and infill housing are already challenging traditional access to properties for fire and other emergencies. This includes vehicle access to the firefighting water supply and source of a fire as well as physical access by Fire and Emergency personnel to perform rescues and duties, where obstructions and site layout inhibit the use of lifesaving appliances such as ladders, hoses and stretchers.

The changes consequential to the NPS-UD will create new challenges for emergency services. Fire and Emergency consider it is vital for the health, safety and wellbeing of communities that the needs of emergency services are taken into account as new urban development is being planned and therefore support amendments to District Plans that provide for this. Some of the implications of these aspects are set out in the following sections.

#### **1.3.1 Pedestrian only developments**

Fire and Emergency note that as a result of the NPS-UD, the requirement for onsite parking in all residential developments has been removed, increasing the number of developments that provide only pedestrian access.

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

Fire and Emergency acknowledge that the New Zealand Building Code (NZBC) specifies access and safety requirements for firefighting operations, where certain buildings must provide appropriate access for fire service vehicles, firefighters and equipment, and the inlets to any automatic fire sprinkler systems or fire hydrant systems. Of note, C/AS1 and C/AS2 set out the acceptable solutions for NZBC Clauses C1-C6

(Protection from Fire) for residential buildings. Of relevance, Part 6 of C/AS1 and C/AS2 sets out the Fire and Emergency vehicular access requirements.

However, as pedestrian access only developments become more common, this subsequently means that many developments will be unable to comply with the NZBC Fire and Emergency vehicular access requirements and subsequently firefighter access is not provided.

Given the shortfalls with the NZBC and the lack of clarity/consistency in the interpretation/application of the NZBC and the RMA, Fire and Emergency are concerned that the potential for pedestrian only access developments are not adequate for responders to efficiently access properties in event of a fire or emergency or to use tools and equipment effectively if required. This has the potential to significantly increase the risk to life and property.

In the interim period while the NZBC catches up with the changing urban environment, Fire and Emergency consider that the RMA needs to address this matter up front in order to manage the use, development and protection of natural and physical resources which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety in accordance with Section 5 of the RMA.

To support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to pedestrian only access developments or developments with inadequate vehicle access across Waimakariri, Fire and Emergency recommend for the Residential Design Principles (RES-MD2):

- pedestrian accessways are clear, unobstructed and well-lit,
- wayfinding for different properties on a development are clear in day and night,
- developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide,
- pedestrian accessways have a minimum width of:
  - 3m on a straight accessway.
  - 6.2m on a curved or cornered accessway
  - 4.5m space to position the ladder and perform operational tasks.

### 1.3.2 Emergency vehicle access

Adequate fire appliance access to both the source of a fire (or other emergency) and a firefighting water supply is essential to the efficient operation of Fire and Emergency. The requirements for firefighting access are set out in the Code of Practice, are further detailed in Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021) and prescribed in Part 6 of C/AS1 and C/AS2 of the NZBC.

These requirements are necessary for Fire and Emergency to be able to operate pumping appliances from a hard standing. Often, this can be done from the public road, and this is how Fire and Emergency prefers to operate where possible. Pumping appliances are vehicles used to pump water for firefighting (refer Appendix A of the Fire and Emergency's 'Designers' guide). They carry a relatively small amount of water (1,350–2,000 litres) and have a limited length of hose. Accordingly, Fire and Emergency must have access to a water supply and must also be able to base operations near the building, so firefighters can reach the fire with water.

There are however a number of limitations and subsequent concerns Fire and Emergency have in relation to the requirements of the NZBC:

- C/AS1 fire service vehicular access requirements (as set out in section 6.1 of the NZBC) does not apply to detached dwellings, within household units in multi-unit dwellings, or to outbuildings, and

ancillary buildings and therefore there is a significant shortfall in access requirements for firefighter access.

- The use of the term “remotely” in both C/AS1 and C/AS2 to determine whether Part 6 applies is unclear and subsequently subjective.
- For buildings to which these vehicle access requirement applies, Fire and Emergency observe significant dispensations given to developments at the time of building consent and therefore compliance with the NZBC is not achieved in many cases. In many cases Fire and Emergency have been informed that dispensations have been granted in recognition that a resource consent for the development has been obtained.

Fire and Emergency has strong concerns that even in situations where the NZBC applies, many recent developments do not comply with the NZBC (in particular 20m access to the building for firefighting or 75m hose length to the furthest point) as exemptions are often given at the building consent stage.

For this reason, WDC need to carefully consider how emergency vehicle access will be provided for new residential developments.

Given the apparent gap in the NZBC, significant consideration needs to be given to new district plan rules and a related policy framework to enable adequate access to detached residential dwellings by emergency vehicles and personnel (i.e. SH risk group buildings not covered by the NZBC). It is requested that these requirements align with those of the NZBC so as to not be inconsistent.

For all other developments to which the NZBC applies (Part 6: firefighting of C/AS1 and C/AS2), Fire and Emergency request that, where not already provided for, the district plan includes rules that ‘duplicate’ the requirements of the NZBC. Fire and Emergency consider that this approach would prevent resource consents being issued that could not be implemented because the layout does not comply with the NZBC requirements and need to be redesigned to provide sufficient firefighter access. This could mitigate some risks, especially when activities that currently require resource consent move to permitted.

Fire and Emergency recommends developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide and so recommend that it is included in the Residential design principles (RES-MD2).

Adequate provision for emergency access will enable Fire and Emergency to:

- Get into buildings and to move freely around their vehicles.
- Gain access to rear dwellings on long sites where hose run lengths become an issue.
- Ensure the safety of firefighters and enable firefighters to deal quickly to smaller undeveloped fires before they develop and endanger members of the public and the firefighters who may need to assist them in either rescues and/or firefighting.

### 1.3.3 Carparking

Fire and Emergency is already encountering new development where emergency vehicle access along the roading corridor has been challenging. Issues with emergency vehicle access in these locations can be caused by narrow roads / laneways, higher density typologies and a lack of off-street parking available resulting in cars parking along both sides of already narrow residential streets. Implications for emergency services include on-road obstructions, meaning emergency vehicles have difficulty or are unable to manoeuvre, as well as an inability to access buildings and locate fire hydrants in an emergency. Inadequate parking lengths along frontages also have been encountered generally from vehicles parking over footpaths in driveways, blocking access.

Fire and Emergency acknowledges that, where no off-street parking is required, there may also be no requirement to provide for vehicular access to a property. In these situations, emergency service staff would

need to enter a property on foot and/or remove fences and other structures to provide access. Regardless, there needs to be sufficient clearance to access buildings with heavy emergency equipment.

Despite Policy 11 and clause 3.38 of the NPS-UD, consent authorities can continue to consider the effects of car parking supply and demand in resource consent applications. Given that section 104(1) requires a consent authority to have regard to 'any actual and potential effects on the environment of allowing [an] activity', an adverse effect of a particular activity could include adverse traffic effects on the local or wider road network.

Section 108AA of the RMA relates to requirements for conditions of resource consents. Section 108AA(1)(b) provides that a condition must not be included in a resource consent for an activity unless the condition is directly connected to one or both of: an adverse effect of the activity on the environment and/or an applicable district or regional rule, or a national environmental standard.

Fire and Emergency support the existing matter of discretion RES-MD4 that responds to this.

#### 1.3.4 Reduced setbacks

The minimum building setbacks from boundaries and between buildings in the Medium Density Residential Standards of 1m on side boundaries from buildings on all sides increases the risk of fire spreading and can inhibit Fire and Emergency personnel from getting to the fire source. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Refer to obstructed access examples in **Appendix B**.

The NZBC requirements (C/AS1 and C/AS2) are relevant here whereby buildings must be designed and constructed so that there is a low probability of fire spread to other property vertically or horizontally across a relevant boundary.

It is therefore vital that the NZBC is enforced and complied with to reduce the risk of fire spread in the intensified urban areas. This includes careful consideration of requirements to use non-combustible building materials to slow the vertical and horizontal spread of fire.

Fire and Emergency encourage WDC to consider integrating these considerations into any urban design guides to align with the NZBC and prompt developments to consider fire risk mitigations early on in design. This should also be included as an advice note with the relevant front, side and rear boundary setback rules within Variation 1 (eg. MRZ-BFS5).

### 1.4 Demand on emergency services

Fire and Emergency has a Statement of Performance Expectations<sup>4</sup> which sets out targets to delivering timely and effective fire response and suppression services as well as other services<sup>5</sup>.

Community need for Fire and Emergency services has been increasing, thereby increasing Fire and Emergency's presence on the roads and need for fast and efficient access to incidents across Waimakariri. Since 2017 there has been a 11% increase in demand in the district.

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

Fire and Emergency's response time commitments to the government and community are key determinants for the location of new, or expansion of existing fire stations. Fire stations therefore need to be strategically

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<sup>4</sup> Statement of Performance Expectations 2021/2022 can be found here: <https://www.fireandemergency.nz/assets/Documents/About-FENZ/Key-documents/FENZ-Statement-of-Performance-Expectations-2021-2022.pdf>

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



located within and throughout communities to maximise their coverage and reduce response times so that they can efficiently and effectively provide for the health and safety of people and communities.

As urban areas develop and intensify, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is critical for the health, safety and wellbeing of people in the community. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA and therefore does not have the ability to designate land for the purposes of fire stations.

Provisions within the rules of the district plan therefore may be the best way to facilitate the development of any new fire stations as the city grows. Ongoing, and more frequent engagement with Fire and Emergency in terms of growth projections and demographic changes will assist us in understanding where we may need new emergency service facilities in the future. This will be particularly important during plan review and plan changes that seek to re-zone large portions of land to facilitate development.

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

Appendix A sets out the details of Fire and Emergency's submission, including the amendments sought by Fire and Emergency to specific provisions in Variation 1 and Variation 2, and the reasons for the amendments.

Fire and Emergency would welcome any questions or further engagement on matters raised in the submission within.

Fire and Emergency may wish to be heard in support of its submission depending upon the proposed amendments to the Plan Change provisions as notified.



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

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Appendix A

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

ID	Provision	Support / oppose	Submission	Requested amendment
Introduction and general provisions				
General approach				
1.	<b>Table RSL-1 Qualifying matters</b>  <i>Natural hazards (urban)</i>	Support	Under Fire and Emergency’s secondary function responding to medical events, rescues and public assists, we support the inclusion of a qualifying matter relating to high hazard flooding areas. Avoiding higher density development in these areas reduces risk to property and life.	Retain as notified.
District Wide Matters				
Strategic Direction				
2.	<b>SD-02 Well-functioning urban environments.</b>  <i>Waimakariri District contains well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</i>	Support	Fire and Emergency supports the inclusion of the health and safety of people and communities in the explanation of well-functioning urban environments. Fire and Emergency considers that this includes the provision of adequate emergency access and sufficient firefighting water supply and pressure.	Retain as notified.
Subdivision				
3.	<b>SUB-R2 Medium Density Residential Zone</b> <b>Activity Status: CON</b>  <i>Where:</i>  2. <i>SUB-S1 to SUB18 are met, except where:</i> a. <i>the allotment is for any unstaffed infrastructure, accessway or road;</i> b. <i>the subdivision is of a fee simple allotment from an approved cross lease site, where the exclusive use areas shown on the existing cross lease plan are not altered, and where only SUB-S5 will apply;</i> c. <i>the subdivision site is a reserve created under the Reserves Act 1977, or any esplanade reserve allotment; or</i> d. <i>where otherwise specified in this chapter.</i> 3. <i>Either:</i> a. <i>for every site with an existing residential unit, either:</i> i. <i>the subdivision does not increase the degree of any non-compliance with the built form standards of this zone; or</i> ii. <i>land use consent for the non-compliance has been granted.</i> b. <i>for every site without an existing residential unit, either:</i> i. <i>the subdivision application is accompanied by a land use application that will be determined concurrently with the subdivision application that demonstrates that it is practicable to construct, as a permitted activity, a residential unit on every site and that no vacant sites will be created; or</i> ii. <i>every site (including sites that are subject to a legal mechanism restricting the number of residential units which can be erected):</i>	Support	Fire and Emergency support the provision for subdivision as a controlled activity provided that the subdivision is able to comply with the relevant standards, which includes water supply for firefighting (SUB-S11).	Retain as notified.



ID	Provision	Support / oppose	Submission	Requested amendment
	<ol style="list-style-type: none"> <li>is practicable to construct as a permitted activity a residential unit; and</li> <li>complies with the built form standards of this zone for each residential unit constructed; and</li> <li>no vacant allotments are created;</li> </ol> <p>For the purpose of 3(a)(i), if a subdivision is proposed between residential units that share a common wall, the requirements as to height in relation to boundary in the district plan do not apply along the length of the common wall.</p> <p><b>Notification</b> An application for a controlled activity under this rule is precluded from being publicly or limited notified.</p>			
<b>Koha pūtea – Financial Contributions</b>				
4.	<p><b>FC-S2: Financial Contribution Calculation for Water, Wastewater and Stormwater</b></p> <ol style="list-style-type: none"> <li>As part of the District Council Financial Contribution Calculation Assessment for drinking water, wastewater and stormwater the following calculation methodology will be used: <ol style="list-style-type: none"> <li>assess whether the upgrade, extension or new infrastructure required already accounted for in growth component allowed for in the Development Contributions policy;</li> <li>assess the increase in capacity of the upgrade, extension or new infrastructure required and only charge the proportion needed to service the proposed development;</li> <li>where required to be installed on Council land and agreed to by the Council, the 100% estimated cost of all materials, installation and commissioning of a water supply booster pump and associated infrastructure to maintain water pressure in any building three or more stories in height; and</li> <li>assess provision of on-site stormwater management, and if sufficient to manage a 10 year storm, either no or a reduced financial contribution will be required.</li> </ol> </li> </ol>	Support in part	<p>Infrastructure upgrades needed as a result of intensification can include upgrades to water supply to provide sufficient firefighting water supply and pressure. Fire and Emergency request that the reference to 'drinking water' be amended to clearly include upgrades for the provision of sufficient water supply and pressure for firefighting in line with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where the development does not have sufficient capacity and is not providing an alternative water supply.</p> <p>Fire and Emergency supports the inclusion of upgrading water pressure for high-rise buildings.</p> <p>These upgrades must be operational prior to the development being completed</p>	As part of the District Council Financial Contribution Calculation Assessment for drinking water <u>(including for firefighting)</u> , wastewater and stormwater the following calculation methodology will be used: ...
5.	<p><b>FC-S4: Financial Contribution Calculation for Rooding</b></p> <ol style="list-style-type: none"> <li>As part of the District Council Financial Contribution Calculation Assessment for rooding the following calculation methodology will be used: <ol style="list-style-type: none"> <li>assess whether the upgrade of extension to or new rooding infrastructure required is already accounted for in the growth component allowed for in the Development Contributions policy;</li> <li>if not provided for in the Development Contributions policy, the cost of the upgrade extension or new rooding infrastructure will be calculated by Council;</li> <li>the percentage contribution required to be paid by the development will be calculated as follows: vehicle movements per day generated by the development divided by vehicle movements per day of the development plus vehicle movements per day of any potential additional lots that could develop plus average daily traffic: % contribution = vmpd development/ (vmpd development + vmpd potential new lots + current average daily traffic);</li> <li>where new roads are required, the financial contribution will be based on a unit rate per kilometre of new road multiplied by the number of new lots divided by the existing lots plus proposed new lots; and</li> </ol> </li> </ol>	Support in part	<p>Transport Infrastructure upgrades needed as a result of intensification can include upgrades to facilitate emergency vehicle access. These upgrades must be operational prior to the development being completed. Fire and Emergency request that this is explicitly stated in the financial contribution methodology.</p>	<ol style="list-style-type: none"> <li>if not provided for in the Development Contributions policy, the cost of the upgrade extension or new rooding infrastructure <u>(including upgrades for emergency access)</u> will be calculated by Council;</li> </ol>

ID	Provision	Support / oppose	Submission	Requested amendment
	e. where land is required to be vested for roading purposes, the area of land, the value of the land, and it's proposed classification, shall be specified by Council.			
<b>Area specific matters</b>				
<b>MRZ- Medium Density Residential Zone</b>				
6.	<p><b>MRZ-R17 Multi-unit residential development</b></p> <p><b>Activity status; RDIS</b></p> <p>Where</p> <p>1. A design statement shall be provided with the application.</p> <p><b>Matters of discretion are restricted to:</b></p> <p>RES-MD2 – Residential design principles</p> <p>RES-MD7 – Outdoor storage</p> <p><b>Notification:</b> An application for a restricted discretionary activity under this rule is precluded from being publically or limited notified</p>	Support in part	<p>Fire and Emergency oppose the preclusion of multi-unit residential developments from being limited notified. Multi-unit developments of a greater scale and density can have limited access provisions which raise emergency servicing issues which Fire and Emergency would want to respond to.</p> <p>See below commentary on the residential design principles.</p>	<p><b>Notification:</b> <del>An application for a restricted discretionary activity under this rule is precluded from being publically or limited notified</del></p>
7.	<p><b>MRZ-BFS1 Number of residential units per site</b></p> <p><b>Activity status when compliance not achieved: RDIS</b></p> <p><b>Matters of discretion are restricted to:</b></p> <ul style="list-style-type: none"> <li>RES-MD2 - Residential design principles</li> <li>RES-MD15 - Effects from qualifying matters - airport noise</li> <li>RES-MD16 - Effects from qualifying matters - natural hazards</li> </ul>	Support in part	See below commentary on the residential design principles.	See RES-MD2 Residential design principles
8.	<p><b>MRZ-BFS4 Height</b></p> <p>Buildings must not exceed 11 metres in height, except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1 metre, where the entire roof slopes 15° or more, as shown in Figure MRZ-1.</p> <p>Activity status when compliance not achieved; DIS</p>	Support in part	Fire and Emergency note the importance to maintain firefighting water supply pressure throughout high rise buildings. Fire and Emergency seek that Council consider this as a matter of discretion when compliance is not achieved. This relates to FC-S2 financial contribution assessment.	
9.	<p><b>MRZ-BFS5 Building and structure setbacks</b></p>	Oppose in part	<p>Fire and Emergency are concerned by the risk of fire spreading due to setbacks from boundaries. It can inhibit Fire and Emergency personnel from getting to the fire source.</p> <p>Fire and Emergency seek an additional matter of discretion to respond to this.</p>	<p>Matters of discretion are restricted to:</p> <p>RES-MD2 - Residential design principles</p> <p>RES-MD5 - Impact on neighbouring property</p>

ID	Provision	Support / oppose	Submission	Requested amendment
				<p><u>RES-MDX – Fire risk mitigation incorporated to avoid horizontal spread of fire across boundaries</u></p> <p>OR incorporated as an additional sub-point under RES-MD5.</p>
<b>RESZ – Matters of discretion for all residential zones</b>				
10.	<p><b>RES-MD2 Residential design principles</b></p> <p>1. <i>Context and character:</i></p> <p>a. <i>The extent to which the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</i></p> <p>b. <i>The relevant considerations are the extent to which the development:</i></p> <p>i. <i>includes, where relevant, reference to the patterns of development in and/or anticipated for the surrounding area such as building dimensions, forms, setback and alignments, and secondarily materials, design features and tree plantings; and</i></p> <p>ii. <i>retains or adapts features of the site that contribute significantly to local neighbourhood character, potentially including existing historic heritage items, Sites of Ngāi Tahu Cultural Significance shown on the planning map, site contours and mature trees.</i></p> <p>2. <i>Relationship to the street and public open spaces:</i></p> <p>a. <i>Whether the development engages with and contributes to adjacent streets, and any other adjacent public open spaces to contribute to them being lively, safe and attractive <b><u>(including impacts of setback requirements for road or rail).</u></b></i></p> <p>b. <i>The relevant considerations are the extent to which the development:</i></p> <p>i. <i>orientates building frontages including entrances and windows to habitable rooms toward the street and adjacent public open spaces;</i></p> <p>ii. <i>designs buildings on corner sites to emphasise the corner;</i></p> <p>iii. <i>needs to minimise south-facing glazing to minimise heat loss; and</i></p> <p>iv. <i>avoids street façades that are blank or dominated by garages.</i></p> <p>3. <i>Built form and appearance:</i></p> <p>a. <i>The extent to which the development is designed to minimise the visual bulk of the buildings and provide visual interest.</i></p> <p>b. <i>The relevant considerations are the extent to which the development:</i></p>	Support in part	Fire and Emergency seek additions to the Residential design principles to take into account provision for firefighting.	<p>Under RES-MD2 Section 5:</p> <p><u>5 c. provides appropriate emergency access to the site</u></p> <p>i. <u>any access to on-site alternative firefighting water supply complies with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</u></p> <p>ii. <u>developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide,</u></p> <p>iii. <u>pedestrian accessways are clear, unobstructed and well-lit,</u></p> <p>iv. <u>wayfinding for different properties on a development are clear in day and night,</u></p> <p>v. <u>pedestrian accessways have a minimum width of:</u></p> <p>a. <u>3m on a straight accessway.</u></p> <p>b. <u>6.2m on a curved or cornered accessway</u></p> <p>c. <u>4.5m space to position the ladder and perform operational tasks.</u></p>

ID	Provision	Support / oppose	Submission	Requested amendment
	<ul style="list-style-type: none"> <li>i. divides or otherwise separates unusually long or bulky building forms and limits the length of continuous rooflines;</li> <li>ii. utilises variety of building form and/or variation in the alignment and placement of buildings to avoid monotony;</li> <li>iii. avoids blank elevations and façades dominated by garage doors; and</li> <li>iv. achieves visual interest and a sense of human scale through the use of architectural detailing, glazing and variation of materials.</li> </ul> <p>4. Residential amenity:</p> <ul style="list-style-type: none"> <li>a. In relation to the built form and residential amenity of the development on the site (i.e. the overall site prior to the development), the extent to which the development provides a high level of internal and external residential amenity for occupants and neighbours.</li> <li>b. The relevant considerations are the extent to which the development: <ul style="list-style-type: none"> <li>i. provides for outlook, sunlight and privacy through the site layout, and orientation and internal layout of residential units;</li> <li>ii. directly connects private outdoor spaces to the living spaces within the residential units;</li> <li>iii. ensures any communal private open spaces are accessible, usable and attractive for the residents of the residential units; and</li> <li>iv. includes tree and garden planting particularly relating to the street frontage, boundaries, accessways, and parking areas.</li> </ul> </li> </ul> <p>5. Access, parking and servicing:</p> <ul style="list-style-type: none"> <li>a. The extent to which the development provides for good access and integration of space for parking and servicing.</li> <li>b. The relevant considerations are the extent to which the development: <ul style="list-style-type: none"> <li>i. integrates access in a way that is safe for all users, and offers convenient access for pedestrians to the street, any nearby parks or other public recreation spaces;</li> <li>ii. provides for parking areas and garages in a way that does not dominate the development, particularly when viewed from the street or other public open spaces; and</li> <li>iii. provides for suitable storage and service spaces which are conveniently accessible, safe and/or secure, and located and/or designed to minimise adverse effects on occupants, neighbours and public spaces.</li> </ul> </li> </ul> <p>6. Safety:</p> <ul style="list-style-type: none"> <li>a. The extent to which the development incorporates CPTED principles as required to achieve a safe, secure environment.</li> </ul>			

ID	Provision	Support / oppose	Submission	Requested amendment
	<p><i>b. The relevant considerations are the extent to which the development:</i></p> <ul style="list-style-type: none"><li><i>i. provides for views over, and passive surveillance of, adjacent public and publicly accessible spaces;</i></li><li><i>ii. clearly demarcates boundaries of public and private space;</i></li><li><i>iii. makes pedestrian entrances and routes readily recognisable; and</i></li><li><i>iv. provides for good visibility with clear sightlines and effective lighting.</i></li></ul>			





# Access issues and maneuverability requirements

During an emergency, Fire and Emergency New Zealand is most efficient and effective when fire appliances and firefighting personnel have fast and clear access.

Delays accessing and dealing with a fire may risk the safety of people and their property.

Clear dwelling/unit numbering and lighting is critical to responders being able to quickly identify the affected property. Firefighters and emergency responders are at greater risk of injury and need to move more cautiously when they are operating on uneven ground, kerbs, stairs and other obstructions. Clear, unobstructed and well-lit access ways help to ensure the safety of responders and those they are assisting.

The photographs below have been provided by Auckland Council to Fire and Emergency New Zealand showing recently constructed new developments and associated accessways. These private pedestrian accessways illustrate the long, narrow pedestrian only accesses and various obstructions that adversely impact Fire and Emergency's ability to respond efficiently and effectively in an emergency.

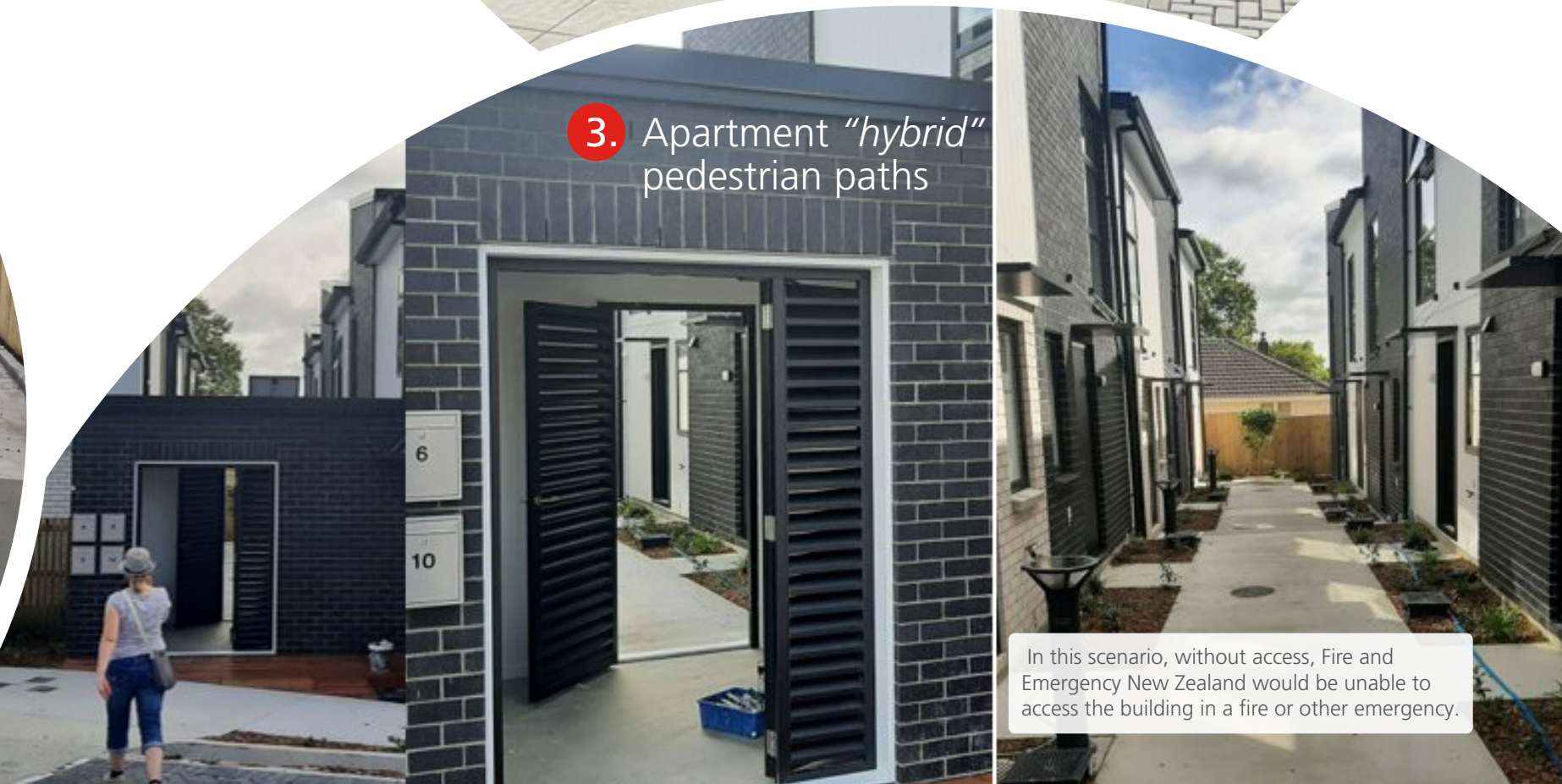
Further, some of the attached images, although granted resource consent are likely to be in conflict to the New Zealand Building Code (in particular 20m access to the building for firefighting or 75m hose length to the further point). This demonstrates that exemptions are often given at the building consent stage.



2. Shared pedestrian and vehicle access



1. Private pedestrian access



3. Apartment "hybrid" pedestrian paths

In this scenario, without access, Fire and Emergency New Zealand would be unable to access the building in a fire or other emergency.



#### 4. Case Study - Lincoln Road, Henderson

##### Identified issues:

- 11 one-bedroom units
- Pedestrian path 1.73m wide within maximum overall width of 1.9m
- No stopping on Lincoln Rd and bus stop immediately outside site
- Pedestrian only access is 173m, exceeding maximum hose run distances of 75m from the nearest hydrant.

