

Feedback on Draft District Plan

To: Far North District Council

Feedback from: Fire and Emergency New Zealand

This feedback is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) to Far North District Council (FNDC) on the draft Far North District Plan.

Fire and Emergency's feedback is:

In achieving the sustainable management of natural and physical resources under the Resource Management Act 1991 (RMA), decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. In addition, the management of significant risks for natural hazards is a matter of national importance under section 6 of the RMA. The first objective of the National Policy Statement on Urban Development relates to New Zealand having well-functioning urban environments. This includes urban environments that, as a minimum, have good accessibility and are resilient to the likely current and future effects of climate change. The risk of fire represents a potential adverse effect of low probability but high potential impact. The effects of climate change, however have the potential to increase the probability of fire, or other emergencies associated with extreme weather events.

Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the draft Far North District Plan to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting and emergency management requirements.

The main functions of Fire and Emergency, as identified in section 11 of the Fire and Emergency New Zealand Act 2017, are:

- to promote fire safety, including providing guidance on the safe use of fire as a land management tool,
- to provide fire prevention, response, and suppression services,
- to stabilise or render safe incidents that involve hazardous substances,
- to provide for the safety of persons and property endangered by incidents involving hazardous substances,
- to rescue persons who are trapped as a result of transport accidents or other incidents,
- to provide urban search and rescue services, and
- to efficiently administer the Fire and Emergency New Zealand Act 2017.

Fire and Emergency also assists in the following additional functions, as identified in section 12 of the Fire and Emergency New Zealand Act 2017, to the extent it has capability and capacity to do so:

- responding to medical emergencies,
- responding to maritime incidents,
- performing rescues, including high angle line rescues, rescues from collapsed buildings, rescues from confined spaces, rescues from unrespirable and explosive atmospheres, swift water rescues, and animal rescues, providing assistance at transport accidents (for example, crash scene cordoning and traffic control),
- responding to severe weather-related events, natural hazard events, and disasters,

- responding to incidents in which a substance (other than a hazardous substance) presents a risk to people, property, or the environment,
- promoting safe handling, labelling, signage, storage, and transportation of hazardous substances, and
- responding to any other situation if Fire and Emergency has the capability to assist.

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.¹ On average, Fire and Emergency attend 1,596² incidents annually across the Far North District with the most occurring type of incidents noted below:

- 538 fires
- 273 medical emergencies
- 277 vehicle accidents
- 57 rescues and public assists³

Fire and Emergency faces broad challenges, such as the increasing frequency and severity of extreme weather events, increasing hot fire days, and competing access to resources such as water and transport infrastructure. This has resulted in the number of Fire and Emergency responses increasing over the last five years. In particular, Fire and Emergency have seen an increase in vegetation fires which reinforces the need for natural hazard management and water supplies particularly in more rural and/or isolated areas. The Waiharara Fire which occurred over late 2021 and early 2022 resulted in the destruction of over 2,800 hectares of land and burnt for 50 days. Wildfires also threatened the communities of Ahipara and Kerikeri.

The increasing risk of these incidents makes the environment Fire and Emergency operates in more complex and puts greater demands on Fire and Emergency and the communities of the Far North as the majority of responders are volunteers from within the community. This feedback 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 lives, property and the surrounding environment. This feedback addresses matters relating to activities required to be undertaken to enable effective preparedness, training and emergency response and to provide for the health and safety of people, communities and environment of the Far North district.

The provisions of the draft District Plan that relate to Fire and Emergency's statutory functions and responsibilities are:

- The provision for emergency service facilities and emergency services training activities
- The storage of hazardous substances, including those used by Fire and Emergency
- Noise limits and the use of emergency sirens
- Height limits and how they apply to hose drying towers
- Vehicle crossings and manoeuvring requirements at fire stations
- Property access for Fire and Emergency personnel and fire appliances
- Provision of water supply and servicing for both training and fire suppression
- Vegetation clearance and the removal of flammable vegetation
- Firebreaks
- Natural hazards and climate change

¹ 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)

² Average 2017-2021

³ Average 2017-2021. Fire and Emergency note the impact of COVID-19 on the number of incidents over the 2020/2021 period. In some urban environments, Fire and Emergency observed a reduction in fires and traffic accidents over this period. It is suspected this may have been due to people being home more during the pandemic and perhaps making them more vigilant around fires and reduction of unwanted fire, and fewer people in the public domain thereby reducing the likelihood of unwanted fires at beaches and parks.

The particular concerns Fire and Emergency have been noting lately in both reticulated and unreticulated areas include:

- Distances to fire hydrants calculated as the crow flies as opposed to actual lengths
- Development inaccessible with 70m hose length or other equipment such as ladders due to driveway/pedestrian pathway widths, lack of hardstand etc.
- Reticulated water supply with insufficient pressure for firefighting to serve development
- Where alternative water supply proposed, it is not of a size/scale appropriate to serve the development OR there is inadequate access to reach the alternative water supply source
- Outdoor storage of rubbish/recycling bags, particularly for multi-unit developments, posing environmental and fire hazards

To enable Fire and Emergency to continue to meet the demands and expectations of communities as they grow and change, the maintenance and development of Fire and Emergency's property estate in strategic locations is essential. There are 22 existing fire stations in the Far North district under a variety of zones, overlays and controls as noted in the table below:

Table 1: Existing Fire Stations in the Far North District

Fire station	Physical Address	Draft Far North District Plan
Rawhiti Volunteer Fire Brigade	1 Rawhiti Road	Māori Purpose – Rural Zone Coastal Environment Overlay
Russell Volunteer Fire Brigade	5 Baker Street	Korarāreka Russell Township Zone Coastal Environment Overlay Heritage Area Overlay (Part D)
Kawakawa Volunteer Fire Brigade	6 Station Road	Mixed Use Zone
Towai Volunteer Fire Brigade	32 Towai Road	Rural Production Zone River Flood Hazard Zone Overlay (100 Year ARI Event)
Paihia Volunteer Fire Brigade	23 Selwyn Road	Mixed Use Zone Coastal Environment Overlay Coastal Flood Overlay (Zone 3: 100 Year + Rapid Sea Level Rise Scenario) Pedestrian Frontage Control Building Height Control
Kerikeri Volunteer Fire Brigade	5 Cobham Road	Mixed Use Zone Pedestrian Frontage Control
Kaikohe Voluntary Rural Fire Force	1B Recreation Road	Mixed Use Zone
Kaikohe Volunteer Fire Brigade	4 Clifford Street	Mixed Use Zone Pedestrian Frontage Control
Omapere Volunteer Fire Brigade	191 Hokianga Harbour Drive	General Residential Zone Coastal Environment Overlay Coastal Erosion Overlay (Zone 3: 100 Year + Rapid Sea Level Rise Scenario)
Okaihau Volunteer Fire Brigade	7 Lake Road	Settlement Zone River Flood Hazard Zone Overlay (100 Year ARI Event and 10 Year ARI Event)
Rawene Volunteer Fire Brigade	51 Parnell Street	General Residential Zone Coastal Environment Overlay

Fire station	Physical Address	Draft Far North District Plan
		Heritage Area Overlay (Area Name: Rawene Heritage Area – Part B)
Kohukohu Volunteer Fire Brigade	24 Beach Road	General Residential Zone Heritage Area Overlay (Area Name: Kohukohu Heritage Area) Coastal Environment Overlay River Flood Hazard Zone Overlay (100 Year ARI Event & 10 Year ARI Event) Coastal Flood Overlay (Zone 1 – 3)
Broadwood Volunteer Fire Brigade	1089 Broadwood Road	Settlement Zone River Flood Hazard Zone Overlay (100 Year ARI Event)
Kaero Volunteer Fire Brigade	33 Leigh Street	Mixed Use Zone River Flood Hazard Zone Overlay (100 Year ARI Event & 10 Year ARI Event)
Cavalli Volunteer Fire Brigade	1405 Matauri Bay Road	Rural Production Zone
Ahipara Volunteer Fire Brigade	45 Takahe Road	General Residential Zone
Kaitaia Volunteer Fire Brigade	196-198 Commerce Street	Mixed Use Zone River Flood Hazard Zone Overlay (100 Year ARI Event) Pedestrian Frontage Control
Mangonui Volunteer Fire Brigade	5 Wrathall Road	Rural Residential Zone Coastal Environment Overlay
Karikari Volunteer Fire Brigade	16 Matai Bay Road	Sport and Active Recreation Zone Coastal Environment Overlay
Rangiputa Volunteer Fire Brigade	699 Rangiputa Road	Natural Open Space Zone Coastal Environment Overlay Coastal Flood Overlay
Houhora Volunteer Fire Brigade	3985 Far North Road	Rural Lifestyle Zone

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

Appendix A sets out the details of Fire and Emergency's feedback, including the amendments sought by Fire and Emergency to specific provisions in the draft Far North District Plan, 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 draft Plan.

Signature of Ron Devlin authorised to sign on behalf of Fire and Emergency



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Appendix A: Fire and Emergency New Zealand feedback on the Draft Far North District Plan

The following table sets out the specific feedback and amendments sought by Fire and Emergency. Where specific amendments to provisions of the draft Far North District Plan are sought, these amendments are shown as red underline (for new text sought) and ~~strike through~~ (for deletion).

ID	Draft provision	Support / oppose	Feedback	Suggested amendment	
PART 1 – INTRODUCTION AND GENERAL PROVISIONS					
Definitions					
1	EMERGENCY SERVICE <i>means ambulances, Civil Defence, Coastguard New Zealand, Fire and Emergency New Zealand, New Zealand Police, Land Search and Rescue, and Surf Life Saving New Zealand.</i>	Support	Fire and Emergency supports the definition of emergency servicing including Fire and Emergency New Zealand.	No amendment sought	S512.001
2	EMERGENCY SERVICE FACILITY <i>means fire stations, ambulance stations, police stations and associated ancillary facilities.</i>	Support	Fire and Emergency support that the definition of emergency service facilities include associated ancillary facilities.	No amendment sought	S512.002
3	<i>New definition</i>	New definition proposed	For clarity, emergency service training could benefit from a separate definition entry like has been done with 'Temporary military training activity' which is included as its own line item as well as being mentioned in the 'temporary activities' definition.	<u>EMERGENCY SERVICE TRAINING ACTIVITY</u> <u><i>Means the training activities, operational support and other non-emergency activities undertaken by the New Zealand Police, Fire and Emergency New Zealand, and other emergency services</i></u>	S512.003
4	HAZARDOUS SUBSTANCE <i>has the same meaning as in section 2 of the RMA (as set out below)</i> <i>includes, but is not limited to, any substance defined in section 2 of the Hazardous Substances and New Organisms Act 1996 as a hazardous substance. The Hazardous Substances and New Organisms Act 1996 defines hazardous substances as meaning, unless expressly provided otherwise by regulations or an EPA notice, any substance—</i> <i>a. with 1 or more of the following intrinsic properties:</i> <i> i. explosiveness:</i> <i> ii. flammability:</i> <i> iii. a capacity to oxidise:</i> <i> iv. corrosiveness:</i> <i> v. toxicity (including chronic toxicity):</i> <i> vi. ecotoxicity, with or without bioaccumulation; or</i> <i>b. which on contact with air or water (other than air or water where the temperature or pressure has been artificially increased or decreased) generates a substance with any 1 or more of the properties specified in paragraph (a).</i>	Support	Fire and Emergency supports the definition of 'Hazardous Substance' being consistent with 'Hazardous Substances and New Organisms Act 1996'.	No amendment sought.	S512.004

5	<p>HEIGHT</p> <p><i>means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point.</i></p>	Support in part	<p>Seek that calculated height does not include emergency service facilities and hose drying towers. Hose drying towers generally require around 12 to 15 metres. Alternatively, hose drying towers should be included in height standards for zones.</p>	<p><i>means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point <u>excluding firefighting hose drying towers.</u></i></p> <p>OR</p> <p>Height standards in zones to exclude hose drying towers.</p>	S512.005
6	<p>OPERATIONAL NEED</p> <p><i>means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints.</i></p>	Support	<p>The ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is paramount the health, safety and wellbeing of people and the community. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and response times so that we can efficiently and effectively 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>	<p>No amendment sought.</p>	S512.006
7	<p>SIGNIFICANT HAZARDOUS FACILITY</p> <p><i>means the use of land and/or buildings (or any part of) for one or more of the following activities:</i></p> <ul style="list-style-type: none"> a. Any Major Hazard Facility desingated under the Health and Safety at work (Major Hazard Facilities) Regulations 2016, including the Ngawha Geothermal Plant. b. Manufacturing, including the associated storage, of hazardous substances (including agrichemicals, fertilisers, acids/alkalis or paints). c. Petroleum exploration and petroleum production facility. d. The storage/use of more than 100,000L of petrol or diesel. e. The storage/use of more than 6 tonnes of LPG. f. Galvanising plants. g. Electroplating and metal treatment. h. Tanneries. i. Timber treatment. j. Freezing works and rendering plants. k. Wastewater treatment plants. l. Metal smelting and refining (including battery refining or recycling). m. Milk processing plants. n. Polymer foam manufacturing <p><i>The storage of petrol and diesel in (c) above does not include the underground storage at service stations and commercial refuelling facilities undertaken in accordance with HSNOCOP 44 Below Ground Stationary Container Systems for Petroleum - Design and Installation and HSNOCOP 45 Below Ground Stationary Containers Systems for Petroleum - Operation (or more recent HSNO code or practice for underground fuel storage.)</i></p>	Support in part	<p>Fire and Emergency support the definition of significant hazardous facility as we consider it does not apply to their emergency service facilities.</p> <p>Fire and Emergency suggest including further detail on activities related with storage of hazardous substances. This is because large scale storage and transport depos for hazardous substances (e.g. like an inland port or bulk chemical warehouse) can have a large impact on neighbouring sites during emergencies.</p>	<p>Amend the definition to better provide for the storage of hazardous substances beyond sites involved with manufacture or sites specific to petrol, diesel or LPG.</p>	S512.007

Tangata Whenua

8	General approach	Support	<p>Fire and Emergency broadly support matters that provide for Tangata Whenua to exercise rangatiratanga.</p> <p>In addition, Fire and Emergency welcome any opportunity to be involved in conversations on maintaining the life sustaining abilities of the district's natural and physical resources, in particular water.</p>	No amendments sought.	S512.008
PART 2 – DISTRICT-WIDE MATTERS					
Strategic Direction					
9	<p>Urban form objectives</p> <p><i>SD-UFD-02</i></p> <p><i>Urban growth and development consolidated around existing reticulated networks within town centres, supporting a more compact urban form, affordability and providing for a mix of housing typologies.</i></p> <p><i>SD-UFD-03</i></p> <p><i>Adequate development infrastructure in place or planned to meet the anticipated demands for housing and business activities.</i></p> <p><i>SD-UFD-04</i></p> <p><i>Urban growth and development is resilient and adaptive to the impacts from natural hazards or climate change.</i></p>	Support	<p>Fire and Emergency support development being appropriately serviced by infrastructure. As towns grow, demand on water supply increases. In particular, while current infrastructure may be sufficient to continue providing for drinking water needs, it may not provide the pressure required for firefighting to meet anticipated housing demand. Therefore, Fire and Emergency support these objectives.</p> <p>Fire and Emergency support the consideration of natural hazards and climate change. Managing these risks will reduce the incidence of, and associated risk to life and property, and prevent or limit injury, damage to property, land and the environment.</p>	No amendment sought.	S512.009 S512.010 S512.011
Energy, Infrastructure, and Transport – Infrastructure					
10	<i>Objectives and policies framework.</i>	Support	These objectives support the continued function of Fire and Emergency. Efficient and effective water supply infrastructure coordinated with land use and development is essential to minimise risk to property and life in the event of a fire.	No amendment sought.	S512.012 S512.013
11	<p><i>I-R17 Construction and upgrading of above ground water supply, wastewater systems, or stormwater infrastructure</i></p> <p>Activity status: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <i>the functional and operational needs of, and benefits from, the network utility;</i> <i>the potential impact on the levels of service or health and safety if the work is not undertaken;</i> <i>the bulk, height, location and design of the network utility, including any associated building(s) or structures;</i> <i>the impact on the character and qualities of the surrounding area;</i> <i>odour, noise, dust; and</i> <i>any adverse effects on public health and/or safety.</i> 	Support in part	Fire and Emergency request that reference is also made to SNZ:PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice as it provides further detail on what is needed for suitable water supply.	<ol style="list-style-type: none"> <i>the functional and operational needs of, and benefits from, the network utility;</i> <i>the potential impact on the levels of service or health and safety if the work is not undertaken;</i> <i>the bulk, height, location and design of the network utility, including any associated building(s) or structures;</i> <i>the impact on the character and qualities of the surrounding area;</i> <i>odour, noise, dust;</i> <i>for water supply, the impact on compliance with SNZ:PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice; and</i> 	S512.014

				g. any adverse effects on public health and/or safety.	
Energy, Infrastructure, and Transport - Transport					
12	<p>TRAN-P3</p> <p>Ensure the safe, efficient and well connected operation of the transport network through the management of:</p> <ul style="list-style-type: none"> a. the subdivision layout, location of buildings, structures and other potential visual obstructions that may impact on sightlines and the integrity of the road carriageway; b. the design of access and parking; c. vehicular access to and from sites; d. the volume of traffic from land use activities; e. vehicular, pedestrian, and cyclist needs, including persons with a disability or limited mobility; f. the adverse cumulative effects of land use and subdivision on the transport network; and g. reverse sensitivity effects that may impact regionally significant infrastructure. 	Support in part	For Fire and Emergency to be able to respond to emergencies, it is important that the transportation network is designed, constructed and operated in a way that ensures a safe, efficient, effective, integrated, resilient and sustainable transport system.	<ul style="list-style-type: none"> b. the design of access (including emergency response access) and parking; c. vehicular access to and from sites, including emergency appliances; <p>...</p> <p><i>Note: For further guidance on providing for emergency response access please see Fire and Emergency New Zealand F5-02 GD Designers' Guide to Firefighting Operations: Emergency Vehicle Access</i></p>	S512.015
13	<p>TRAN-R2 Vehicle crossings and access, including private accessways (All Zones)</p> <p>Activity Status: Permitted</p> <p>Where:</p> <p>...</p> <p>PER-2</p> <p>The vehicle crossing and access for fire appliances comply with SNZ PAS 4509:2008 New Zealand Fire Fighting Water Supplies Code of Practice.</p> <p>...</p> <p>Activity status where compliance not achieved with PER-1, PER-2, PER-3, PER-4, PER-5 or PER-6: Discretionary</p>	Support	Fire and Emergency strongly support the requirement to comply with SNZ PAS 4509:2008 for vehicle crossings and access across all zones. Fire and Emergency interpret this to also apply to access once on sites to likely sources of fire (e.g. residential building) as well as any on-site water supplies.	No amendments sought.	S512.016
14	TRAN-S1 Requirements for parking	Support in part	<p>Fire and Emergency have previously found carparking or lack of parking areas has delayed emergency response times. We seek explicit reference to the effects on emergency response access.</p> <p>In addition see note below on minimum parking requirements.</p>	<p>Where the standard is not met, matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. any recommendations in a transport assessment approved by a chartered professional engineer; b. the potential for adverse effects on the safety and efficiency of the transport network, including emergency response access and effects on vehicles, pedestrians and cyclists; c. the scale, management and operation of the activity as it relates to its demand for parking; 	S512.017

				<p>d. the use of low impact design techniques to minimise stormwater run off; and</p> <p>e. the ability for persons with a disability or limited mobility to park, enter and exit a vehicle and manoeuvre around a parking area safely and effectively.</p>																																																																	
15	<p>TRAN-Table 9 – Requirements for private accessways</p> <p>TRAN-Table 9 - Requirements for private accessways</p> <table border="1"> <thead> <tr> <th rowspan="2">Number of residential units</th> <th rowspan="2">Maximum length (m)</th> <th rowspan="2">Minimum legal width (m)</th> <th colspan="2">Minimum carriageway width (m)</th> <th rowspan="2">Footpath width (m)</th> <th rowspan="2">Maximum gradient</th> <th rowspan="2">Crossfall</th> </tr> <tr> <th>Unsealed shoulder</th> <th>Surfacing width</th> </tr> </thead> <tbody> <tr> <td colspan="8" style="text-align: center;">Urban</td> </tr> <tr> <td>2-4</td> <td>50</td> <td>4.0</td> <td>-</td> <td>1 x 3.0</td> <td>3.0</td> <td>-</td> <td>12.5% from the first 5m from the road boundary and 22% for the remainder restricted to straight sections</td> </tr> <tr> <td>5-8</td> <td>100</td> <td>6.0</td> <td>-</td> <td>1 x 4.5</td> <td>4.5</td> <td>1 x 0.95</td> <td></td> </tr> <tr> <td colspan="8" style="text-align: center;">Rural</td> </tr> <tr> <td>2</td> <td>-</td> <td>4.0</td> <td>2 x 0.25</td> <td>1 x 3.0</td> <td>3.5</td> <td>-</td> <td>12.5% for the first 5m from the road boundary and 22.2% for the remainder</td> </tr> <tr> <td>3-5</td> <td>-</td> <td>6.0</td> <td>2 x 0.25</td> <td>1 x 3.0</td> <td>4.5</td> <td>-</td> <td>3% where sealed; 6% where unsealed</td> </tr> <tr> <td>6-8</td> <td>-</td> <td>10.0</td> <td>2 x 0.25</td> <td>1 x 3.0</td> <td>6.0</td> <td>-</td> <td></td> </tr> </tbody> </table>	Number of residential units	Maximum length (m)	Minimum legal width (m)	Minimum carriageway width (m)		Footpath width (m)	Maximum gradient	Crossfall	Unsealed shoulder	Surfacing width	Urban								2-4	50	4.0	-	1 x 3.0	3.0	-	12.5% from the first 5m from the road boundary and 22% for the remainder restricted to straight sections	5-8	100	6.0	-	1 x 4.5	4.5	1 x 0.95		Rural								2	-	4.0	2 x 0.25	1 x 3.0	3.5	-	12.5% for the first 5m from the road boundary and 22.2% for the remainder	3-5	-	6.0	2 x 0.25	1 x 3.0	4.5	-	3% where sealed; 6% where unsealed	6-8	-	10.0	2 x 0.25	1 x 3.0	6.0	-		<p>Oppose in part</p> <p>The current requirements in this table contradict with complying with SNZ PAS 4509:2008 under TRAN-R2.</p> <p>The current minimum carriageway width of 3.0m for rural areas and 2-4 residential units in urban areas is not sufficient for fire appliances. Fire and Emergency request that the table is updated to at least 4.0m to allow for emergency response access.</p> <p>In addition the maximum gradient suitable for Fire and Emergency is 16% / 1 in 6. The proposed maximum gradient exceeds this.</p>	<p>Amend table provisions to align with SNZ PAS 4509:2008 by including:</p> <ul style="list-style-type: none"> a minimum carriageway width of 4.0m a minimum height clearance of 4.0m gradient shall not exceed 16% accessway surfaces must be able to take the weight of a 20 tonne truck
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16	<p>Overview</p> <p>...</p> <p>Wildfire</p> <p><i>Ensuring adequate water supplies are available for firefighting purposes, appropriate setbacks from vegetation and suitable access for firefighting in new subdivisions.</i></p> <p>...</p>	<p>Support</p>	<p>Wildfire can pose significant risk to property and life. Fire and Emergency support the mitigation measures FNDC have noted. However, we consider that this should not apply solely to new subdivisions but all development.</p>	<p><i>Ensuring adequate water supplies are available for firefighting purposes, appropriate setbacks from vegetation and suitable access for firefighting in new subdivisions.</i></p> <p>Include reference to the <i>Fire Plan for Northland, Te Hiku</i> in the overview of the chapter.</p>																																																																	
17	<p>Objectives and Policies Framework</p>	<p>Support</p>	<p>Fire and Emergency have an interest in the natural hazards chapter insofar as to ensure that the District Plan adopts a risk-based approach to hazard management and manages land use in areas subject to natural hazard. Managing land use in relation to hazards and the consequences of climate change will reduce the incidence of, and associated risk to life and property, and prevent or limit injury, damage to property, land and the environment. This will enable Fire and Emergency to carry out its requirements under the Fire and Emergency Act more effectively.</p>	<p>No amendment sought.</p>																																																																	
18	<p>NH-R5 Wild fire – Buildings used for a vulnerable activity (excluding accessory buildings)</p> <p>Activity status: Permitted (all zones)</p>	<p>Support in part</p>	<p>Fire and Emergency support this rule as it will require vulnerable activities (including residential activities) to have adequate water for firefighting.</p>	<p><i>Any building used for a vulnerable activity (excluding accessory buildings) either:</i></p> <ol style="list-style-type: none"> <i>is located on a site that has suitable access to a fire hydrant(s) with sufficient water</i> 																																																																	

S512.018

S512.019

S512.020
S512.021

S512.022

	<p>Where:</p> <p>PER-1</p> <p>Any building used for a vulnerable activity (excluding accessory buildings) either:</p> <ol style="list-style-type: none"> is located on a site that has access to a fire hydrant; or provides for water supply and access to water supplies for fire fighting purposes in compliance with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. <p>PER-2</p> <p>Any building used for a vulnerable activity (excluding accessory buildings) is set back at least 20m from the dripline of any contiguous scrub or shrubland, woodlot or forestry.</p> <p>Activity status where compliance not achieved with PER-1 or PER-2: Discretionary</p>		<p>However, demand on reticulated water systems can mean existing fire hydrants do not have sufficient pressure for firefighting.</p>	<p><u>pressure and supply for firefighting as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice</u>; or</p> <ol style="list-style-type: none"> provides for <u>an alternative</u> water supply and access to water supplies for fire fighting purposes in compliance with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.
19	<p>NH-R6 Wild fire – extensions and alterations to buildings used for a vulnerable activity (excluding accessory buildings) that increase the GFA</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>Extensions or alterations that increase the GFA of a building used for a vulnerable activity (excluding accessory buildings) either:</p> <ol style="list-style-type: none"> are located on a site that has access to a fire hydrant; or provide for water supply and access to water supplies for fire fighting purposes in compliance with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. <p>PER-2</p> <p>Extensions or alterations that increase the GFA of a building used for a vulnerable activity (excluding accessory buildings) are set back at least 20m from the dripline of any contiguous scrub or shrubland, woodlot or forestry.</p> <p>Activity status where compliance not achieved with PER-1 or PER 2: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> The availability of water for fire-fighting; The scale of the extension or alteration; Alternative options for the location of the extension or alteration; The use of building materials to reduce fire risk; and The extent and type of vegetation present. 	<p>Support in part.</p>	<p>Please see above comment for NH-R5.</p> <p>Fire and Emergency support the inclusion of considerations around building materials and vegetation types under the matters of discretion.</p>	<p>Extensions or alterations that increase the GFA of a building used for a vulnerable activity (excluding accessory buildings) either:</p> <ol style="list-style-type: none"> is located on a site that has <u>suitable</u> access to a fire hydrant(s) with sufficient water <u>pressure and supply for firefighting as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice</u>; or provides for <u>an alternative</u> water supply and access to water supplies for fire fighting purposes in compliance with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> The availability <u>adequacy (volume, pressure and access)</u> of water for fire-fighting; The scale of the extension or alteration; Alternative options for the location of the extension or alteration; The use of building materials to reduce fire risk; and The extent and type of vegetation present.
<p>Hazardous substances</p>				

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20	<p>HS-R2 Establishment of a new significant hazardous facility</p> <p>...</p> <p><i>PER-2</i></p> <p><i>The new significant hazardous facility is setback at least 250m from a sensitive activity</i></p> <p>...</p> <p><i>DIS-2</i></p> <p><i>The new significant hazardous facility is setback at least 250m from a sensitive activity</i></p> <p>..</p> <p>HS-R11 New sensitive activity</p> <p><i>Activity status: Non-complying</i></p> <p><i>Where:</i></p> <p><i>NC-1</i></p> <p><i>The new sensitive activity is located within 250m of a Significant Hazardous Facility</i></p>	Support in part	<p>Fire and Emergency support the consideration of proximity between sensitive land uses and significant hazardous facilities.</p> <p>Where sites store substantial quantities that release a toxic or flammable gas (e.g. chlorine or ammonia gas) or where the substance could cause an explosion during a fire (e.g. ammonia nitrate), the proposed 250m setback distance may be insufficient as sensitive activities could be impacted 500-1000m or more away.</p>	<p>Council to identify whether a two-tiered approach to setbacks for sensitive land uses could be more effective to safeguard communities by differentiating between the potential catchment of flammable gas or explosions compared to other 'significant hazardous facilities' with less reach.</p> <p>Fire and Emergency welcome the opportunity to discuss this with Council and provide examples.</p>
Historical and Cultural Values				
21	<p><i>HA-R3 Strengthening or fire protection of scheduled Heritage Resource</i></p> <p>Activity status: Permitted</p> <p>Where:</p> <p><i>PER-1</i></p> <p><i>The strengthening or fire protection elements are not externally visible.</i></p>	Support	<p>Fire and Emergency support enabling fire protection for heritage resource.</p>	<p>No amendments sought.</p>
Natural Environment Values – Ecosystems and indigenous biodiversity				
22	<p><i>IB-R1 Indigenous vegetation pruning, trimming and clearance and any associated land disturbance for specified activities within and outside a Significant Natural Area</i></p> <p><i>Activity status: Permitted</i></p> <p><i>Where:</i></p> <p><i>PER-1</i></p> <p><i>It is for any of the following:</i></p> <ol style="list-style-type: none"> <i>1. To address an immediate risk to the health and safety of the public or damage to property;</i> <i>11. Creation and maintenance of firebreaks to manage fire risk;</i> 	Support	<p>Fire and Emergency may be required to remove vegetation in the event of an emergency or to reduce fire risk. This is enabled under Section 65 and 68 of the Fire and Emergency New Zealand Act 2017. The exact quantities of vegetation disturbance required cannot be determined in advance, and will be unique to the risk or emergency response required. Fire and Emergency considers that this approach provides for these activities and so support the references to addressing immediate risks to health and safety, and managing fire risk. This aligns with the Fire and Emergency New Zealand Act 2017.</p>	<p>No amendments sought.</p>

S512.024

S512.025

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Natural Environment Values – Natural Character				
23	<p>NATC-R3 Earthworks or indigenous vegetation clearance</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The earthworks or indigenous vegetation clearance within wetland, lake and river margins is:</p> <ol style="list-style-type: none"> required for the repair or maintenance permitted under NATC-R2; or required to provide for safe and reasonable clearance for existing overhead power lines. necessary to address a risk to public health and safety. for biosecurity reasons. for the sustainable non-commercial harvest of plant material for rongoā Māori. 	Support in part	<p>Fire and Emergency may be required to remove vegetation in the event of an emergency or to reduce fire risk. This is enabled under Section 65 and 68 of the Fire and Emergency New Zealand Act 2017. The exact quantities of vegetation disturbance required cannot be determined in advance, and will be unique to the risk or emergency response required. Fire and Emergency considers that the reference to managing fire risk and so recommends similar language as in IB-R1 so that the plan aligns with the actions required by Fire and Emergency personnel under the Fire and Emergency New Zealand Act 2017.</p>	<ol style="list-style-type: none"> required for the repair or maintenance permitted under NATC-R2; or required to provide for safe and reasonable clearance for existing overhead power lines. necessary to address a risk to public health and safety <u>or damage to property.</u> <u>To create and/or maintain firebreaks to manage fire risk</u> for biosecurity reasons. for the sustainable non-commercial harvest of plant material for rongoā Māori.
S512.027				
Natural Environment Values – Natural features and landscapes				
24	<p>NFL-R3 Earthworks or indigenous vegetation clearance</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The earthworks or indigenous vegetation clearance is:</p> <ol style="list-style-type: none"> required for the repair or maintenance permitted under NFL-R2 Repair or maintenance. required to provide for safe and reasonable clearance for existing overhead power lines. necessary to address a risk to public health and safety. for biosecurity reasons. for the sustainable non-commercial harvest of plant material for rongoā Māori. 	Support in part	Please see comments above for NATC-S3	<ol style="list-style-type: none"> required to provide for safe and reasonable clearance for existing overhead power lines. necessary to address a risk to public health and safety <u>or damage to property.</u> <u>To create and/or maintain firebreaks to manage fire risk</u> for biosecurity reasons.
S512.028				
Subdivision				
25	Objectives and policies framework - general	Support	Fire and Emergency support the subdivision policy framework to the extent that subdivision should have the infrastructure appropriate for the intended use of the land (SUB-O3).	No amendment sought.
S512.029				
26	<p>SUB-P5</p> <p>Manage subdivision design and layout in the General Residential, Mixed Use and Settlement zone to provide for safe, connected and accessible environments by:</p> <ol style="list-style-type: none"> minimising vehicle crossings that could affect the safety and efficiency of the current and future transport network; avoid cul-de-sac development unless the site or the topography prevents future public access and connections; 	Support in part	Fire and Emergency supports the intent to create a safe transport environment. This includes adequate emergency access on both the public roading network and private accessways.	<ol style="list-style-type: none"> maximising accessibility and wayfinding <u>(including for emergency response), and connectivity by creating walkways, cycleways and an interconnected transport network.</u> <p><u>Note: For further guidance on providing for emergency response access please see Fire and Emergency New Zealand F5-02 GD Designers'</u></p>
S512.030				

	<ul style="list-style-type: none"> c. providing for development that encourages social interaction, neighbourhood cohesion, a sense of place and is well connected to public spaces; d. contributing to a well connected transport network that safeguards future roading connections; and e. maximising accessibility, connectivity by creating walkways, cycleways and an interconnected transport network. 			Guide to Firefighting Operations: Emergency Vehicle Access, specifically Section 4.2	
27	<p>SUB-R8 Subdivision of a site containing land susceptible to land instability</p> <p>SUB-R11 Subdivision of a site within flood hazard areas</p> <p>SUB-R12 Subdivision of a site within coastal hazard areas</p>	Support in part	<p>Given Fire and Emergency's secondary function responding to natural hazard emergencies, Fire and Emergency support the approach of controlling development/subdivision in identified natural hazard areas.</p> <p>It is essential that emergency responders are able to access potential emergencies on these sites.</p>	<p>Include an additional matter of control/matter of discretion to SUB-R8, SUB-R11 and SUB-R12 on having adequate access for emergency response to each lot created.</p>	<p>S512.031</p> <p>S512.032</p> <p>S512.033</p>
28	<p>SUB-S2 Requirements for building platforms for each allotment</p> <p>...</p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. allotment area and dimensions for intended purpose or land use, having regard to the relevant zone standards and any District wide rules for land uses; b. allotment sizes and dimensions are sufficient for operational and maintenance requirements; c. compatibility with the pattern of the surrounding subdivision, land use activities, and access arrangements; d. any physical constraints; and e. whether a suitable alternative building platform can be provided. 	Support in part	<p>Seek explicit reference of emergency response access needs.</p>	<ul style="list-style-type: none"> a. <i>compatibility with the pattern of the surrounding subdivision, land use activities, and access arrangements (including emergency response access);</i> 	<p>S512.034</p>
29	<p>SUB-S3 Water supply</p> <ol style="list-style-type: none"> 1. All new allotments shall have the ability to connect to a safe potable water supply with a capacity that is adequate for the anticipated potential land uses; 2. Where a connection to Council's reticulated water supply systems is available, all allotments must connect; 3. Where a connection to Council's reticulated water systems is not available all allotments must provide a water supply system; 4. All new allotments must have access to sufficient water supplies for fire fighting consistent with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. <p>Note: This standard does not apply where the allotment is for a road, or for access purposes, or for a purpose or activity for which water supply is not necessary.</p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. adequacy of the supply of water to every allotment, and its suitability for the likely land use; b. adequacy of water supplies, and access for fire fighting purposes; and c. the standard of water supply infrastructure installed in subdivisions, and the adequacy of existing supply systems outside the subdivision. 	Support	<p>Fire and Emergency support the explicit reference to allotments requiring water supplies in line with SNZ PAS 4509:2008.</p>	<p>No amendment sought.</p>	<p>S512.035</p>

General district wide matters – coastal environment

30	<p>CE-R3 Earthworks or indigenous vegetation clearance in coastal environment</p> <p>Activity status: Permitted</p> <p>Where: PER-1</p> <p>The earthworks or indigenous vegetation clearance is:</p> <ol style="list-style-type: none"> 1. required for repair or maintenance permitted under CE-R2 Repair or Maintenance. 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to ensure the health and safety of the public. 4. for biosecurity reasons. 5. for the sustainable non-commercial harvest of plant material for rongoā Māori. 	Support in part	Please see comments above for NATC-S3	<ol style="list-style-type: none"> 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety <u>or damage to property.</u> 4. <u>To create and/or maintain firebreaks to manage fire risk</u> 5. for biosecurity reasons. 	S512.036
General district wide matters – noise					
31	<p>Noise note:</p> <p>The noise rules and effects standards do not apply to noise generated by the following activities:</p> <p>...</p> <ol style="list-style-type: none"> 7. any warning device or siren used by emergency services for emergency purposes (and routine testing and maintenance); 8. the use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are operated by emergency services or lifeline utilities; 9. activities at emergency service facilities associated with emergency response and emergency response training; 	Support	Emergency sirens play a crucial role in facilitating a prompt emergency response and provide a critical backup to the pager system used by Fire and Emergency. A siren can also be the most effective means of communication in alerting volunteers as well as providing assurance to the people who have made the call that help is on the way. Fire and Emergency support FNDC's approach of noise standards not applying to emergency response activities.	No amendment sought.	S512.037
General district wide matters – temporary activity					
32	<p>TA-R2 Temporary military training activity and emergency services training activity</p> <p>Activity status: Permitted</p> <p>Where: PER-1</p> <p>Any accessory building or structure is removed within seven days of the activity finishing.</p> <p>PER-2</p> <p>The duration of the activity does not exceed a collective total of 31 calendar days per year on any site.</p>	Support	Fire and Emergency support the permitted status for emergency services training as it enables Fire and Emergency to achieve its statutory function by facilitating firefighting and emergency response. Training may include live fire training (i.e. burning and putting out fires) and equipment training both at Fire and Emergency sites (see Table 1 for existing fire stations) and off site.	No amendment sought.	S512.038

	Activity status where compliance not achieved with PER-1 or PER-2: Discretionary			
General district wide matters – Treaty Settlement Land overlay				
33	<p>TSL-S6 On-site service</p> <p>...</p> <p>Water</p> <p>2. Where a connection to Council's reticulated water systems is not available, all residential units shall have access to potable (drinkable) water from a community water scheme or private water bore or shall be able to store 45,000 litres of potable water from another source.</p> <p>...</p> <p>Where the standard is not met, matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. the ability to ensure an adequate supply of potable water for the uses of the site or activity; b. the security of any proposed potable water supply from contamination; c. the adequacy of storage volume of water for domestic and fire-fighting purposes; and d. the ability to ensure the avoidance of soil contamination or any other adverse effects from the discharge of any wastewater or stormwater. 	Support in part	Support inclusion of firefighting water supply as well as potable (or drinking) water supply. Fire and Emergency request this framing is copied throughout the District Plan.	<p>Amend references to potable or drinking water throughout the plan to also make reference to firefighting water supply.</p> <p>Water</p> <p>2. Where a connection to Council's reticulated water systems is not available, all residential units shall have access to potable (drinkable) water <u>and access to water supplies for firefighting in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.</u> from a community water scheme or private water bore or shall be able to store 45,000 litres of potable water from another source.</p>
AREA SPECIFIC MATTERS				
General residential zone				
34	GRZ-P6	Support	Fire and Emergency support the encouragement and support for on-site water storage. On-site water storage lessens demand on reticulated water supplies and increases resilience in the face of climate change.	
35	<p>GRZ-R9 Residential activity (multi-unit development)</p> <p>Activity status: Controlled</p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. the effects on the neighbourhood character, residential amenity and the surrounding residential area from all of the following. <ul style="list-style-type: none"> i. building intensity, scale, location, form and appearance. ii. location and design of parking and access. iii. location of outdoor living space in relation to neighbouring sites. 	Support in part	Seeks specific reference to emergency response access and infrastructure servicing. Fire and Emergency have previously found that multi-unit residential developments have posed more significant fire risks and/or inadequate emergency response access.	<p>a. the effects on the neighbourhood character, residential amenity and the surrounding residential area from all of the following.</p> <ul style="list-style-type: none"> i. building intensity, scale, location, form and appearance. ii. location and design of parking and access <u>(including emergency response access).</u> iii. location of outdoor living space in relation to neighbouring sites. iv. <u>Infrastructure servicing (including adequate firefighting water supplies compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</u>

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Settlement Zone				
36	<p>RSZ-R4 Visitor accommodation</p> <p>Activity status: Permitted</p> <p>....</p> <p>Activity status where compliance with not achieved with PER-1, PER-2 or PER-3:</p> <p>Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. the number of visitors accommodated; b. the location and design of buildings, outdoor areas, parking and loading areas and access; c. hours of operation; d. noise, disturbance and loss of privacy of adjacent sites; e. screening and landscaping; f. waste treatment and disposal; g. water supply for drinking and firefighting; and h. stormwater disposal. 	Support	<p>Fire and Emergency support the consideration of water supply for firefighting for visitor accommodation. However, this same matter of discretion should be applicable across many of the other activities listed across zone chapters.</p> <p>Particularly given that the Settlement zone notes that most settlements do not have reticulated water supply and so alternative firefighting water sources are essential for more than just visitor accommodation.</p> <p>Please see below request for a infrastructure servicing standard to respond to this.</p>	
Māori Purpose Zone				
37	<p>MPZ-S6 On-site services</p> <p>...</p> <p>Water</p> <p>2. Where a connection to Council's reticulated water systems is not available, all residential units shall have access to potable (drinkable) water from a community water scheme or private water bore or shall be able to store 45,000 litres of potable water from another source.</p> <p>...</p> <p>Where the standard is not met, matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. the ability to ensure an adequate supply of potable water for the uses of the site or activity; b. the security of any proposed potable water supply from contamination; c. the adequacy of storage volume of water for domestic and fire-fighting purposes; and d. the ability to ensure the avoidance of soil contamination or any other adverse effects from the discharge of any wastewater or stormwater. 	Support in part	<p>Support inclusion of firefighting water supply as well as potable (or drinking) water supply. Fire and Emergency request this framing is copied throughout the District Plan.</p>	<p>Amend references to potable or drinking water throughout the plan to also make reference to firefighting water supply too as below.</p> <p>Water</p> <p>2. Where a connection to Council's reticulated water systems is not available, all residential units shall have access to potable (drinkable) water <u>and access to water supplies for firefighting in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.</u> from a community water scheme or private water bore or shall be able to store 45,000 litres of potable water from another source.</p>
Moturoa Island Zone				
38	<p>Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application:</p> <ul style="list-style-type: none"> a. compliance with the Council approved Moturoa Island Development Plan; b. the natural character of the coastal environment; 	Support	<p>Support inclusion of firefighting water supply as well as potable (or drinking) water supply. Fire and Emergency request this framing is copied throughout the District Plan.</p>	<p>Amend references to potable or drinking water throughout the plan to also make reference to firefighting water supply.</p>

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	<ul style="list-style-type: none"> c. the presence or absence of structures, buildings or infrastructure; d. the location, scale and design of any proposed development; e. the temporary or permanent nature of any adverse effects; f. the need for and location of earthworks or vegetation clearance; g. effects from natural hazards; h. satisfactory disposal of wastewater and stormwater; i. effects on ecological values; and j. the provision for a potable and firefighting water supply. 			
Ngawha Innovation and Enterprise Park Zone				
39	<p>NIEP-R8 New buildings or structures, and extensions or alterations to existing buildings or structures</p>	Support in part	Fire and Emergency request reference to firefighting water supply.	<p>CON-2</p> <p>The development platform and buildings are connected to the NIEP internal reticulated 3 waters systems or sufficient onsite provision within the development platform can be demonstrated by a suitably qualified person (except wastewater).</p> <p>Matters of control are limited to:</p> <ul style="list-style-type: none"> a. the extent to which the building and development is consistent with the 'Ngawha Innovation and Enterprise Park Design Guidelines', dated March 2022; b. the materials used, including consideration of colour, finishing, reflectivity, and permeability; c. the effect of buildings, structures and signage design (including facades and roofs) on the character and amenity of the zone and surrounding rural environment; d. the siting and separation of buildings; e. provisions of infrastructure services and the ability of stormwater, water <u>(as per the SNZ PAS 4509:2008 New Zealand Fire Service Water Supplies Code of Practice)</u> and wastewater to be managed <u>adequately</u> adequately; and f. access and onsite manoeuvrability.
Orongo Bay Zone				
40	<p>OBZ-R14 Comprehensive development plan</p> <p>Activity status: Restricted Discretionary</p> <p>Where:</p> <p>RD-1</p> <p>Prior to any subdivision, use or development on any site within the zone, Council will require a Comprehensive Development Plan to be submitted containing the following information:</p>	Support in part	<p>Fire and Emergency consider that the provision of this information to Council will result in better outcomes. Fire and Emergency request that emergency responder access and firefighting water supply information should also be explicitly requested to ensure reduced risk to life and property.</p> <p>Fire and Emergency support the matter of discretion relating to fire hazards and consider that the additional information requested would allow for better assessment of this matter.</p>	<ul style="list-style-type: none"> 3. <u>internal access ways, car parking, vehicle circulation and storage areas including how emergency response access has been provided for;</u> 4. <u>location of all infrastructure and services including stormwater and effluent collection, treatment and disposal, and access to adequate firefighting water supply;</u> <p>....</p>

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<ol style="list-style-type: none"> 1. <i>the internal design of the site including location of any proposed lots, appearance, design, use of materials and scale of all buildings;</i> 2. <i>external access to the Orongo Bay Special Purpose Zone provided that this is limited to a single entry/exit point on Aucks Road and to a single entry/exit point on Russell Road;</i> 3. <i>internal access ways, car parking, vehicle circulation and storage areas;</i> 4. <i>location of all infrastructure and services including stormwater and effluent collection, treatment and disposal;</i> 5. <i>a comprehensive stormwater and effluent management plan detailing location of plant and disposal areas, collection, treatment (including use of detention ponds), disposal methods, and ongoing control and management with particular attention to the treatment standards required to meet the use of adjoining coastal marine area waters for oyster farming (refer Regional Plan for Northland). This is to include provision for effluent from the three Rural Production lots contiguous to the site. If the riparian restoration area identified in the Orongo Bay Outline Plan Concept is to be used to receive water then appropriate standards and monitoring are to be included;</i> 6. <i>a landscape plan and a riparian restoration plan prepared by suitably qualified persons showing the nature of all landscaping and ecological restoration and enhancement, including planting implementation, fencing, maintenance, bonding and formal protection mechanisms (such as vesting in Council or covenanting) to achieve the visual amenity and riparian restoration rules for the zone, and the integrated management of the riparian and wetland areas depicted on the Orongo Bay Outline Plan Concept;</i> 7. <i>details of all requirements for earthworks including the management of run-off during construction;</i> 8. <i>signage and illumination;</i> 9. <i>requirements for any vegetation clearance;</i> 10. <i>proposals for any staging of development within the zone;</i> 11. <i>details of the types of activities to be permitted within the zone; and</i> 12. <i>the methods to be employed to ensure that the Comprehensive Development Plan applies to and binds any other owner of the land or part thereof.</i> <p>Note: <i>In particular the Comprehensive Development Plan should incorporate low impact design measures to ensure that stormwater is managed and monitored to ensure hydrological neutrality in peak volumes and duration to avoid or mitigate adverse effects on receiving environments, particularly with regard to the oyster farms in Orongo Bay.</i></p> <p>Matters of discretion are restricted to:</p> <p>...</p> <ol style="list-style-type: none"> m. <i>the degree to which the proposal avoids natural hazards including fire hazards;</i> <p>....</p>			
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	Note: This rule has partial immediate legal effect because RD-1(5) relates to water (Section 86B(3)(a) of the RMA)			
Quail Ridge Zone				
41	<p>QR-R6 Roading and Access</p> <p>Activity status: Controlled</p> <p>...</p> <p>CON-2</p> <p>Internal roads comply with TRAN-R6 Quail Ridge on site access, parking and access</p> <p>CON-3</p> <p>Internal roads shall have a minimum width of 3.5m seal, with passing bays as necessary.</p> <p>...</p>	Oppose in part	<p>Fire and Emergency requires minimum width of 4.0m for emergency responder access.</p> <p>In addition the activity references 'TRAN-R6 Quail Ridge on site access, parking and access'. The TRAN-R6 included in transport chapter does not cover this.</p>	<p>Amend reference to TRAN-R6 and ensure it provides for emergency response access in accordance with SNZ PAS 4509:2008.</p> <p>CON-3</p> <p>Internal roads shall have a minimum width of 3.5<u>4.0</u>m seal, with passing bays as necessary.</p>
42	<p>QR-S10 Stormwater, water supply and wastewater facilities.</p> <p>Plans and specifications of the on site stormwater, water supply and wastewater facilities in each stage shall be provided to the Council and the facilities made operational before the associated residential units in the stage are occupied.</p>	Support	<p>Fire and Emergency support the timing of water supply facilities to be operational before residential units are occupied.</p>	<p>QR-S10 Stormwater, water supply and wastewater facilities.</p> <p>Plans and specifications of the on site stormwater, water supply and wastewater facilities in each stage shall be provided to the Council and the facilities made operational before the associated residential units in the stage are occupied.</p> <p><i>Note: plans and specifications must show how on site alternative firefighting water supplies comply with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</i></p>
Matters applicable to multiple zones				
43	<p>Emergency services facility</p>	Support in part	<p>Fire and Emergency support an activity for emergency service facilities being listed as an activity in zones. Please see Table 1 of the submission for the location of existing fire stations. Note that these are found in a range of zones.</p> <p>New fire stations may be necessary in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. Provisions within the rules of the district plan are therefore the best way to facilitate the development of</p>	<p>Emergency service facilities included as a permitted activity in all zones.</p> <p>Emergency service facilities are exempt from standards relating to setback distances, vehicle crossings.</p>

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			<p>any new fire stations within the district as urban development progresses.</p> <p>Fire and Emergency request that emergency service facilities are included as a permitted activity in all zones. The draft Plan currently only includes emergency services facilities as an activity in some zones and with varying activity status.</p> <p>In addition, fire stations have specific requirements with relation to setback distances and vehicle crossings. Fire and Emergency request that emergency service facilities are exempt from these standards.</p>	
44	Setback standards	Support	<p>Setbacks play a role in reducing spread of fire as well as ensuring Fire and Emergency personnel can get to a fire source or other emergency.</p> <p>An advice note is recommended to raise to plan users (e.g. developers) early on in the resource consent process that there is further control of building setbacks and firefighting access through the New Zealand Building Code (NZBC).</p>	<p><u>Advice note:</u></p> <p><u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>
45	Outdoor living space standards across zones	Support in part	<p>Fire and Emergency support the provision of an outdoor living space on the premise that while not directly intended, may provide access for emergency services and space for emergency egress.</p> <p>Fire and Emergency acknowledge that firefighting access requirements are managed through the NZBC however consider it important that these controls are brought to the attention of plan users (i.e. developers) in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. The NZBC requirements will have an influence over how a site is deigned and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent so that Council are able to assess this design to ensure compliance with the RMA.</p> <p>Fire and Emergency therefore request that, as a minimum, an advice note is included directing plan users to the requirements of the NZBC.</p>	<p><u>Advice note:</u></p> <p><u>Site layout requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>
46	New standard proposed.	New standard proposed	<p>Many zones hold objectives and policies related to servicing developments with appropriate infrastructure. Noting that NH-R5 requires adequate firefighting water supply for vulnerable activities (including residential),</p>	<p>Include new standard and/or matter of discretion across zones on infrastructure servicing (including emergency response transport/access and adequate water supply for firefighting) that applies</p>

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			Fire and Emergency consider that inclusion of an additional standard on infrastructure servicing within individual zone chapters may be beneficial.	across several activities, particularly new buildings and residential activities.
OTHER				
47	<p>Documents Incorporated by Reference – Proposed District Plan</p> <p>...</p> <p>SNZ PAS 4509:2008 - New Zealand Fire Service firefighting water supplies code of practice</p> <p>Cost</p> <p><i>Not free to download but available for inspection at Council offices.</i></p> <p>Parts of the ePlan that reference this document</p> <p><i>Part 2 - District-Wide Matters / Hazards and Risks / Natural Hazards / NH-R6</i></p> <p>...</p>	Support in part	<p>While Fire and Emergency strongly support reference to SNZ PAS 4509:2008, this entry appears incomplete as other areas of the ePlan reference it beyond NH-R6.</p> <p>Furthermore, the Code of Practice is free to download through the Fire and Emergency New Zealand website.</p>	Amend cost and ePlan sections referenced.

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