

Upper Hutt City Council District Plan Submission on notified Plan Change 50 – Rural review

Form 5

Clause 6 of the First Schedule to the Resource Management Act 1991

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This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) on Proposed Plan Change 50 – rural review (PC50) to the Upper Hutt City Council District Plan (District Plan).

- Fire and Emergency could not gain an advantage in trade competition through this submission.
- Fire and Emergency is directly affected by the proposal.
- Fire and Emergency wishes to be heard in support of its submission.
- Fire and Emergency is supportive of the proposed provisions of PC50, subject to the relief sought in Appendix A.

Fire and Emergency's submission is:

The principle objectives of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property, and to:

- protect and preserve life,
- prevent or limit injury,
- prevent or limit damage to property and land, and
- prevent or limit damage to the environment¹.

Fire and Emergency's main functions² are:

- (a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and
- (b) to provide fire prevention, response, and suppression services; and
- (c) to stabilise or render safe incidents that involve hazardous substances; and
- (d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and
- (e) to rescue persons who are trapped as a result of transport accidents or other incidents; and
- (f) to provide urban search and rescue services.

¹ Fire and Emergency New Zealand Act 2017 section 10(a)(b)

² Fire and Emergency New Zealand Act 2017 section 11(2)

Fire and Emergency also has secondary functions³ to assist in:

- (a) responding to medical emergencies; and
- (b) responding to maritime incidents; and
- (c) 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; and
- (d) providing assistance at transport accidents (for example, crash scene cordoning and traffic control); and
- (e) responding to severe weather-related events, natural hazard events, and disasters; and
- (f) responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment; and
- (g) promoting safe handling, labelling, signage, storage, and transportation of hazardous substances; and
- (h) responding to any other situation if Fire and Emergency has the capability to assist; and
- (i) any other function conferred on Fire and Emergency as an additional function by the Minister in accordance with section 112 of the Crown Entities Act 2004.

This submission seeks to enable Fire and Emergency to carry out its requirements under the Fire and Emergency New Zealand Act 2017.

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

- ensuring emergency service vehicles and Fire and Emergency personnel can adequately access both built and natural environments in the event of an emergency,
- ensuring new development in the rural environment is adequately serviced by firefighting water supply, 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 rural communities as they grow and change.

Fire and Emergency seeks the following decision:

- Amend PC50 to provide for the health, safety and wellbeing of people and communities in Upper Hutt city by making the changes set out in Appendix A of this submission, including any further or consequential relief that may be necessary to address the matters raised in this submission.

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

If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at a hearing.

³ Fire and Emergency New Zealand Act 2017 section 12(3)

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



Fleur Rohleder

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

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Appendix A: Fire and Emergency New Zealand submission

Table 1 sets out Fire and Emergency New Zealand's (Fire and Emergency) submission and subsequent requested relief sought to the provisions of Upper Hutt City Council's (UHCC) Proposed Plan Change 50 (PC50). These amendments are shown in **red** (for new text sought) and ~~strikethrough~~ (for deletion).

Table 1: Fire and Emergency submission

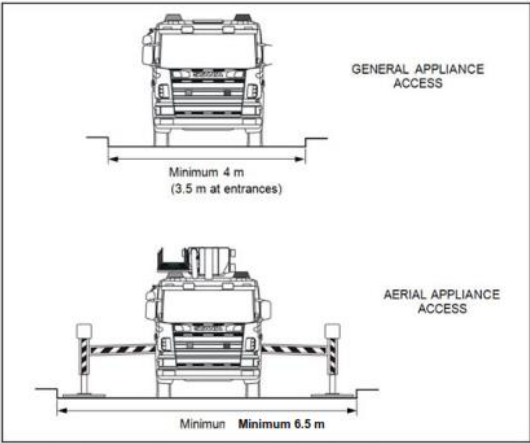
ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
PART 1 – INTRODUCTION AND GENERAL PROVISIONS				
3 INTERPRETATION				
1	New definition	-	Fire and Emergency seeks the inclusion of a new definition for 'Emergency service facilities', as it subsequently provides for the relief sought through its submission in relation to the provision of fire stations in the rural zones. It is vital that PC50 provides for emergency service facilities to better provide for the health, safety and wellbeing of rural communities by enabling the establishment and ongoing operation of fire stations.	<p>New definition:</p> <p>Emergency service facilities – means the facilities of organisations that are responsible for the safety and physical welfare of people or property in the community. It includes fire stations, ambulance stations, police stations and emergency coordination facilities.</p>
PART 2 – DISTRICT-WIDE MATTERS				
TP — Transport and Parking				
2	TP-S10	Oppose	By way of background, for fire appliances to access an emergency, adequate roading and accessway design is necessary to support the operational requirements of Fire and Emergency. These requirements are set out in F5-02 GD	Amend Appendix C of the Code of Practice for Civil Engineering Works to align with the emergency vehicle access requirements set out in the 'Designers' guide to firefighting operations Emergency vehicle access F5-02 GD'.

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			<p>Designers' guide to firefighting operations Emergency vehicle access⁴ and key requirements are summarised below:</p> <ul style="list-style-type: none"> The minimum roading and carriageway widths should not be less than 4m. This width is required to allow fire appliances to get through them easily and to allow Fire and Emergency to carry out emergency operations. This means that when a fire appliance is parked, Fire and Emergency personnel can easily open and exit the doors, access equipment from its compartments and safely connect the hoses. This is illustrated in the figure below. A clear vehicle crossing of no less than 3.5m wide should be provided as site entrances, internal entrances and between buildings. A height clearance at vehicle crossings and along carriageways should not be less than 4m. The maximum negotiable gradient is 1:5, but in general the roading gradient should not exceed 16%. Large fire appliances need to be provided with enough room to turn around without carrying out multi-point turns in an emergency. For pumping vehicle access, the minimum inner radius should be 6.3m and the outer radius 11.3m. For aerial vehicle access, the minimum inner radius should 	<p>AND</p> <p>Amend TP-S10 as follows:</p> <p>Subdivision in General rural, Rural production or Rural lifestyle and Settlement Zones</p> <ol style="list-style-type: none"> The maximum number of allotments accessed via a right of way or private road must be no more than six; and comply with the widths in Appendix C, Figure 1 (Road Design Standards – Urban) of the Code of Practice for Civil Engineering Works. <p>2. <u>Right of ways, private accessways and legal access lots, shall provide for the following:</u></p> <ol style="list-style-type: none"> <u>An access width of no less than 4 metres.</u> <u>Be formed and constructed with a sealed surface and corridor that meets the full access and manoeuvring requirements associated with the activities it services;</u> <u>A maximum negotiable gradient not exceeding 16%;</u> <u>Where applicable, be designed with additional width necessary to accommodate the tracking curve of a 12.6 metre long rigid emergency service vehicle with a minimum of a 500mm buffer each side of the vehicle;</u> <u>A clearance height of no less than 4 metres.</u>

⁴ <https://fireandemergency.nz/assets/Documents/Business-and-Landlords/Building-and-designing-for-fire-safety/F5-02-GD-FFO-emergency-vehicle-access.pdf>

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be 5.2m and the outer radius 12.6m.



Fire and Emergency support new permitted activity standard TP-S10 to the extent that it requires subdivision in the General rural, Rural production or Rural lifestyle and Settlement Zones and subsequent access to comply with the access widths specified in Appendix C, Figure 1 (Road Design Standards - Urban) of the Code of Practice for Civil Engineering Works.

Appendix C of the Code of Practice for Civil Engineering Works requires private ways servicing 1-3 lots (up to 6 dwelling units) to have a road reserve width of 3.6m, and a carriageway width of at least 2.75m. Private ways servicing 4-6 lots (comprising 7-12 dwelling units) must have a road reserve width and carriageway width of 5m.

This does not meet Fire and Emergency’s minimum access width requirements. This is particularly important in unreticulated areas where fire appliances will, in most cases, need to enter a site to access the onsite firefighting water supply and the emergency (i.e. structural fire). In areas that

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			<p>may be reticulated, where driveways exceed 50m in length, either an access width of 4m is required or alternatively the provision of an appropriate hardstand along access designed to meet the minimum hardstand requirements to facilitate a fire appliance while static and operating.</p> <p>Fire and Emergency recognise that access is largely regulated through Council's Code of Practice for Civil Engineering Works which is understood to not be within scope of PC50.</p> <p>It is however Fire and Emergency's position that the Code of Practice for Civil Engineering Works does not meet the purpose and principles of the Resource Management Act (RMA).</p> <p>As the current requirements relating to access (including but not limited to access widths) are inadequate, Fire and Emergency request that:</p> <ul style="list-style-type: none"> • Council's Code of Practice for Civil Engineering Works be updated to reflect the changes sought in this submission, and • TP-S10(2) be amended to include appropriate access standards in the absence of appropriate design and construction standards to facilitate emergency vehicle access as set out in Council's Code of Practice for Civil Engineering Works. <p>This relief will ensure that the Code of Practice for Civil Engineering Works continues to be compatible with the UHCDP and that the UHCDP promotes the sustainable management of the City's natural and physical resources in accordance with the RMA, achieving acceptable environmental outcomes, and the development and maintenance of well-constructed and safe services and infrastructure.</p>	

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SUB-RUR – Subdivision in Rural Zones				
3	SUB-RUR-P3 Natural hazards	Support	Fire and Emergency support SUB-RUR-P3 as the policy framework promotes the avoidance, remediation, or mitigation of the effects of natural hazards. This supports Fire and Emergency’s function insofar that it helps avoid emergency situations. Furthermore, as the definition of ‘Natural Hazard’ includes fire, the policy framework also promotes the avoidance, remediation, or mitigation of the effects of fire.	No relief sought.
4	SUB-RUR-P4 Appropriate subdivision	Support	Fire and Emergency support SUB-RUR-P4 insofar that the policy seeks to enable subdivision which results in allotments with appropriate legal and physical access. This policy supports the subsequent relief sought elsewhere in this submission relating to emergency vehicle access standards.	No relief sought.
5	SUB-RUR-P5 Infrastructure capacity	Support	Fire and Emergency strongly support SUB-RUR-P5 which seeks to ensure that subdivision creates allotments that are able to accommodate on-site water supply infrastructure and provide sufficient water supply capacity for firefighting purposes.	No relief sought.
6	SUB-RUR-R1 (Controlled) SUB-RUR-R2 (Controlled) SUB-RUR-R4 (Controlled)	Support	Fire and Emergency support the matters of control which enable UHCC to impose conditions relating to: <ul style="list-style-type: none"> • the provision of, and effects on, network utilities and/or services, and • the standard, construction and layout of vehicular access. <p>As controlled activities must be granted, it is vital that the matters which UHCC can impose conditions over provide</p>	No relief sought.

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	SUB-RUR-R5 (Controlled) ...		<p>enough scope for fire risk effects to be managed. Fire and Emergency encourages UHCC to utilise:</p> <ul style="list-style-type: none"> • Matter 1 to ensure that the layout of proposed subdivision can accommodate an onsite firefighting water supply. • Matter 2 to ensure onsite services such as a suitable firefighting water supply can be provided. • Matter 3 to ensure that the water supply and development will be accessible to emergency service vehicles. 	
7	SUB-RUR-S1	Support in part	<p>Fire and Emergency support SUB-RUR-S1 insofar as the standards for subdivision require compliance with TP-S10. Fire and Emergency support is subject to the relief sought in relation to TP-S10 above, which will assist in ensuring that suitable emergency service access is provided.</p>	No relief sought.
8	SUB-RUR-S2 Minimum requirement for subdivision	Support in part	<p>Fire and Emergency support SUB-RUR-S2 insofar as the standards require a minimum net site area of 1ha for new subdivisions across all rural zones. This will avoid the creation of undersized allotments which are not capable of accommodating an onsite firefighting water supply (as is generally required in unreticulated areas in the rural environment). Furthermore, Fire and Emergency consider this supports the policy direction set out in SUB-RUR-P5.</p> <p>Fire and Emergency do however request that emergency service facilities are exempt from SUB-RUR-S2. Should Fire and Emergency seek to develop a new fire station in the rural zones, Fire and Emergency will likely be creating an allotment which does not meet the minimum net size area for new allotments.</p>	<p>Amend as follows:</p> <p><i>Minimum requirements for subdivision:</i></p> <p>...</p> <p><i>These standards shall not apply to any allotment for a network utility, reserve, <u>emergency service facilities</u>, or conversation purposes.</i></p>

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			<p>Fire and Emergency require the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies. 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 any new fire stations within the district as rural development progresses.</p> <p>Fire stations are not large-scale developments and will only be constructed as necessary in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change. Emergency service facilities and activities in the rural environment are anticipated to have low adverse effects and be vital for maintaining the safety and wellbeing of rural communities. As such, Fire and Emergency consider that the exemption for SUB-RUR-S2 should also extend for emergency service facilities.</p>	
9	<p>SUB-RUR-S3</p> <p>Access standards for subdivision</p>	Oppose	<p>PC50 introduces the Settlement Zone to the existing access standards for subdivision. Therefore, the access standards set out in SUB-RUR-S3 must be suitable and sufficient for subdivision activities in the Settlement Zone to meet the purpose of the RMA.</p> <p>As above, Fire and Emergency recognise that access is largely regulated through Council's Code of Practice for Civil Engineering Works which sits outside the district plan and therefore not within scope of PC50.</p>	<p>Amend SUB-RUR-S3 to include:</p> <p>...</p> <p>(2) All accessways and manoeuvring areas shall be formed and surfaced in accordance with the Code of Practice for Civil Engineering Works, <u>and have:</u></p> <p>(a) <u>An access width of no less than 4 metres;</u></p> <p>(b) <u>Be formed and constructed with a sealed surface and corridor that meets the full access</u></p>

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			<p>As such, in order for PC50 to meet Part 2 of the RMA and subsequently provide for emergency vehicle access, Fire and Emergency request amendments to SUB-RUR-S3 to ensure that access for subdivision in the Settlement Zone is designed to enable sufficient access in accordance with the 'Designers guide to firefighting operations emergency vehicle access F5-02 GD'.</p> <p>Fire and Emergency note that these new standards should also apply to the General Rural, Rural Production, Rural Lifestyle and Development Area 2 and request that UHCC carefully consider its application across all Rural Zones.</p>	<p><u>and manoeuvring requirements associated with the activities it services;</u></p> <p>(c) <u>A maximum negotiable gradient not exceeding 16%;</u></p> <p>(d) <u>Where applicable, be designed with additional width necessary to accommodate the tracking curve of a 12.6 metre long rigid emergency service vehicle with a minimum of a 500mm buffer each side of the vehicle;</u></p> <p>(e) <u>A clearance height of no less than 4 metres.</u></p>
10	SUB-RUR-R6 (Restricted Discretionary)	Support	<p>Fire and Emergency support the inclusion of matters of discretion which enable UHCC to impose conditions on the provision of network utilities / services, the standard / layout of vehicular access, and natural hazards (which includes fire).</p> <p>Fire and Emergency encourages UHCC to utilise:</p> <ul style="list-style-type: none"> • Matter 2 to ensure that the layout of a subdivided lot can accommodate an onsite firefighting water supply. • Matter 2 to ensure a suitable firefighting water supply has been provided. • Matter 4 to ensure that the water supply and development will be accessible to emergency service vehicles. • Matter 9 to ensure that fire risk associated with natural hazards is appropriately managed and emergency access and egress is considered in this regard. 	No relief sought.

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11	SUB-RUR-R7	Support	<p>Fire and Emergency support SUB-RUR-R7 insofar as subdivision in the Berketts Farm Precinct area is a restricted discretionary activity. UHCC's discretion, and ability to impose conditions on, extends to the matters listed under SUB-RUR-R1, including:</p> <ul style="list-style-type: none"> • the design, appearance and layout of the subdivision. • the provision of, and effects on, network utilities and/or services, and • the standard, construction, and layout of vehicular access. <p>As Berketts Farm Precinct is a residential development in an unreticulated, rural environment, it is vital that the matters which UHCC can restrict its discretion over provide enough scope for consideration of effects on emergency services. Fire and Emergency encourages UHCC to utilise the matters of SUB-RUR-R1, specifically:</p> <ul style="list-style-type: none"> • Matter 1 to ensure that the layout of a subdivided lot can accommodate an onsite firefighting water supply. • Matter 2 to ensure a suitable firefighting water supply can be provided. • Matter 3 to ensure that a firefighting water supply and development will be accessible to emergency service vehicles. 	No relief sought.
12	SUB-RUR-R12	Support	<p>Fire and Emergency support the full discretionary activity status for subdivision with does not comply with SUB-S1, SUB-S2, and SUB-S3 that relate to access. This provides UHCC with full discretion to assess access arrangements / non-compliances and decline / impose conditions accordingly. If the</p>	No relief sought.

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			relief sought under these standards is accepted, then the activity status of SUB-RUR-R12 will be strongly supported by Fire and Emergency.	
13	SUB-RUR-R14	Support	Fire and Emergency support a non-complying activity status for the creation of allotments which do not have formed legal access to a formed legal road. No formed legal access to an allotment would mean that emergency service access may not be achievable, increasing the risk to life, property and the environment in an emergency. The requirement for resource consent will provide UHCC the ability to decline the application where the objectives and policies in relation to the provision of access cannot be met or effects are more than minor effect.	No relief sought
PART 3 – AREA-SPECIFIC MATTERS				
GRUZ – General Rural Zone				
14	GRUZ-O3 Infrastructure Appropriate infrastructure is provided to support existing and planned activities meeting the needs of the	Support in part	<p>Fire and Emergency support GRUZ-O3 insofar as the objective requires the provision of appropriate infrastructure, which would include reticulated water supply and roads, for existing and planned activities within the rural environment.</p> <p>However, Fire and Emergency note that ‘infrastructure’ is not defined, and clarity is required.</p> <p>In the absence of a definition, Fire and Emergency request an amendment to GRUZ-O3 to include ‘on-site services’ required to support existing and planned activities and would include non-reticulated firefighting water supply such as private water supply tanks that are generally anticipated within unreticulated</p>	<p>Amend objective as follows:</p> <p>Appropriate infrastructure and on-site services are is provided to support existing and planned activities meeting the needs of the rural community.</p>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
	rural community.		rural areas. As such, this will promote the health, safety and wellbeing of the rural communities.	
15	GRUZ-P1 Appropriate activities	Oppose	<p>Fire stations may have a functional need to be located in the General Rural Zone. 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 minimise response times so that they 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>GRUZ-P1 does not provide for emergency service facilities (which fall under the definition of a community facility in the District Plan) as an appropriate activity within the General Rural Zone.</p>	<p>Amend policy as follows:</p> <p><i>GRUZ-P1 Appropriate activities</i></p> <p><i>Enable activities that are compatible with the purpose of the General rural zone, while ensuring that their design, scale and intensity is appropriate to the rural environment, including:</i></p> <p>...</p> <p><u><i>6. Emergency service facilities.</i></u></p> <p><i>Where they:</i></p> <p>...</p> <p><u><i>7. Provide for the health, safety and well-being of the community.</i></u></p>
16	GRUZ-P5 Infrastructure	Support	Fire and Emergency support the inclusion of a policy which ensures that the transport networks and other regionally significant network utilities (such as water supplies) are able to be operated safely and efficiently. This will ensure Fire and Emergency are able to meet their objectives by undertaking their functions.	No relief sought.
17	New rule	-	Fire and Emergency seek the inclusion of a new rule for emergency service facilities being a permitted activity in the General Rural Zone.	Inclusion of a new rule which provides for emergency service facilities as a permitted activity within the General Rural zone.

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			<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 any new fire stations within the district as development progresses.</p> <p>Fire and Emergency consider the permitted activity standards within the General Rural chapter will appropriately manage the effects of fire stations within the zone.</p>	
18	GRUZ-S1	Oppose	<p>For fire appliances to access an emergency, adequate accessway width, height clearance, gradient and turning circles are necessary to support the operational requirements of Fire and Emergency. These requirements are set out in submission point 2 above.</p> <p>As TP-S10 and SUB-RUR-S3 relate to subdivision only, it is important that the access standards for land use activities in GRUZ are adequate for emergency vehicle access. Fire and Emergency request that all land use activities are subject to GRUZ-S1 and GRUZ-S1 be amended to reflect the minimum requirements for emergency vehicle access.</p>	<p>Amend GRUZ-S1 as follows:</p> <p>All accessways and manoeuvring areas shall be formed and surfaced in accordance with the Code of Practice for Civil Engineering Works <u>and have:</u></p> <ul style="list-style-type: none"> (a) <u>An access width of no less than 4 metres.</u> (b) <u>Be formed and constructed with a sealed surface and corridor that meets the full access and manoeuvring requirements associated with the activities it services;</u> (c) <u>A maximum negotiable gradient not exceeding 16%;</u> (d) <u>Where appropriate, be designed with additional width necessary to accommodate the tracking curve of a 12.6 metre long rigid emergency service vehicle with a minimum of a 500mm buffer each side of the vehicle;</u>

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				(e) <u>A clearance height of no less than 4 metres.</u>
19	GRUZ-S2	Support in part	<p>Fire and Emergency promotes defensible spaces around rural dwellings⁵.</p> <p>Based on the definition of 'forestry' under the UHCDP, GRUZ-S2 would apply to plantation forestry (being the production of timber or other forest products). However, Fire and Emergency note that the use of the term 'plantation forestry' is being introduced via PC50 therefore clarity is requested around the intended management of forestry through the district plan.</p> <p>Fire and Emergency note that plantation forestry is managed by the National Environmental Standard for Plantation Forestry (NES-PF). GRUZ-S2(2) is not consistent with the requirements of Section 14 of the NES-PF which sets out setbacks from adjoining properties, dwellings, and urban areas. In accordance with Regulation 14 of the NES-PF, afforestation must not occur within 40m of a dwelling.</p> <p>As such, Fire and Emergency request that GRUZ-S2 is amended to reflect the separation requirements of the NES-PF in relation to dwellings and align with best practice fire risk management through the provision of appropriate separation distances, providing defensible spaces and thus reducing the risk of fire spread between land uses.</p>	<p>Amend GRUZ-S2 as follows:</p> <p>Setbacks</p> <p>...</p> <p>2. New residential units shall not be built within 440m of an existing forest.</p> <p>...</p>
20	GRUZ-S5	Oppose	<p>Fire and Emergency note that the Code of Practice for Civil Engineering Works only covers the flow and design of firefighting water supplies for reticulated systems. Furthermore,</p>	<p>Amend GRUZ-S5 as follows:</p> <p><i>Water supply, stormwater and wastewater</i></p>

⁵ <https://www.fireandemergency.nz/home-fire-safety/fire-safety-checklists/rural-home-fire-safety-checklist/>

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			<p>there is a significant gap within the provisions of PC50 for the provision of a firefighting water supply for non-reticulated areas such as the GRUZ. It is vital that all buildings and developments, particularly in non-reticulated areas, are provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</p> <p>Fire and Emergency seeks an amendment to GRUZ-S5 that ensures all land use activities in the General Rural zone are provided with a suitable a firefighting water supply.</p>	<ol style="list-style-type: none"> <i>All activities shall comply with the water supply, stormwater and wastewater standards in the Code of Practice for Civil Engineering Works.</i> <i>New buildings and development must be designed to ensure that the stormwater runoff from all new impervious surfaces will be disposed of or stored on-site and released at a rate that does not exceed the peak stormwater runoff when compared to the pre-development situation for the 10% and 1% rainfall annual exceedance probability event.</i> <i><u>New buildings (other than residential units not connected to Council's reticulated water supply (see GRUZ-S14)) and development must be provided with a firefighting water supply in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></i>
21	GRUZ-S6	Support in part	<p>Fire and Emergency support best practice management in relation to plantation forestry.</p> <p>Fire and Emergency note that GRUZ-S6 is not consistent with the requirements of the NES-PF, specifically Section 14 of the NES-PF which sets out requirements for setbacks from adjoining properties, dwellings, and urban areas. Fire and Emergency recommend UHCC further consider the requirements of the NES-PF to avoid any unnecessary duplication. Notwithstanding this, Fire and Emergency request that GRUZ-S6 is amended to reflect the separation requirements of the NES-PF in relation to dwellings and align with best practice fire risk management through the provision of appropriate separation distances, providing defensible</p>	<p>Amend GRUZ-S6 as follows:</p> <p><i>Plantation forestry</i></p> <ol style="list-style-type: none"> <i>Forest owners and managers are expected to comply with the management and operational practices in the New Zealand Forest Code of Practice.</i> <i>There shall be a 10m non-millable buffer from any waterbody with a width greater than 1m.</i> <i>A buffer width of at least 1410m is to be provided to any existing residential unit on another site.</i>

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			spaces and thus reducing the risk of fire spread between land uses.	
22	GRUZ-S14	Support with amendment	<p>Fire and Emergency strongly support the requirement for residential units to be provided with a domestic fire sprinkler system that is connected to a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>Sprinkler systems provide a highly effective means of early fire suppression which can enable the fire to be controlled, or even extinguished, early in its development. Sprinklers quickly apply water directly to the source of the fire and are the most reliable method to control a fire. This minimises the risk of loss of life, property damage and adverse effects on the wider environment (e.g. the spread of fire through surrounding vegetation). This also has the benefit of substantially lowering the volume of on-site firefighting water supply required for a sprinklered dwelling.</p> <p>However, Fire and Emergency note that NZS 4541:2013 has since been superseded by NZS 4541:2020 and has requested relief to this effect.</p>	<p>Amend as follows:</p> <p>GRUZ-S14</p> <p><i>Water supply and firefighting sprinkler system for residential units.</i></p> <ol style="list-style-type: none"> 1. <i>Each residential unit that is not connected to Council's reticulated water supply must have the following installed:</i> <ol style="list-style-type: none"> a. <i>a self-sufficient potable water supply with a minimum volume of 38,000L; and</i> b. <i>a domestic fire sprinkler system in accordance with NZS 4541:2013 NZS 4541:2020 that is connected to a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</i>
23	GRUZ-R5	Support subject to relief	Fire and Emergency support GRUZ-R5, subject to the relief sought under GRUZ-S1, GRUZ-S2, GRUZ-S5, GRUZ-S6 and GRUZ-S14 being accepted.	No relief sought.

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
RPROZ – Rural Production Zone				
24	RPROZ-O2	Support in part	<p>Fire and Emergency support RPROZ-O2 insofar as the objective requires the provision of appropriate infrastructure, which would include water supply and roads, for existing and planned activities within the rural environment.</p> <p>As infrastructure is not defined under the District Plan, Fire and Emergency consider clarity is needed. As such, Fire and Emergency request an amendment to RPROZ-O3 to clearly include the provision of on-site services required to support existing and planned activities. This will provide an objective framework which promotes the provision of on-site services, which Fire and Emergency interprets to include firefighting water supplies, for activities within the rural environment. As such, this will promote the health and safety of rural communities.</p>	<p>Amend objective as follows:</p> <p>Appropriate infrastructure <u>and on-site services are</u> is provided to support existing and planned activities meeting the needs of the rural community.</p>
25	RPROZ-P1	Support in part	<p>Fire stations may have a functional need to be located in certain areas, including the Rural Production Zone. 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 is important. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and minimise response times so that they 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>Amend policy as follows:</p> <p><i>RPROZ-P1 Appropriate activities</i></p> <p><i>Enable activities that are maintain the productive capacity of highly productive land in the Rural production zone, while ensuring that their design, scale and intensity is appropriate to the rural environment, including:</i></p> <p>...</p> <p><u>5. Emergency service facilities</u></p> <p><i>Where they:</i></p> <p>...</p>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			The content of RPROZ-P1 does not provide for fire stations (which fall under the definition of a community facility in the District Plan) as an appropriate activity within the Rural Production Zone.	<u>8. Provide for the health, safety and well-being of the community.</u>
26	RPROZ-R2	Support in part	Fire and Emergency support RPROZ-R2, subject to the relief sought under RPROZ-S1, RPROZ-S2, RPROZ-S5, RPROZ-S6 and RPROZ-S12 being accepted.	No relief sought.
27	RPROZ-S1	Support in part	<p>For fire appliances to access an emergency, adequate accessway width, height clearance, gradient and turning circles are necessary to support the operational requirements of Fire and Emergency. These requirements are set out in submission point 2 above.</p> <p>As TP-S10 and SUB-RUR-S3 relate to subdivision only, it is important that the access standards for land use activities in RPROZ are adequate for emergency services. Fire and Emergency request that all land use activities are subject to RPROZ-S1 and RPROZ-S1 be amended to reflect the minimum requirements for emergency service vehicles.</p>	<p>Amend RPOZ-S1 as follows:</p> <p>All accessways and manoeuvring areas shall be formed and surfaced in accordance with the Code of Practice for Civil Engineering Works <u>and have:</u></p> <ul style="list-style-type: none"> (a) <u>An access width of no less than 4 metres.</u> (b) <u>Be formed and constructed with a sealed surface and corridor that meets the full access and manoeuvring requirements associated with the activities it services;</u> (c) <u>A maximum negotiable gradient not exceeding 16%;</u> (d) <u>Where appropriate, be designed with additional width necessary to accommodate the tracking curve of a 12.6 metre long rigid emergency service vehicle with a minimum of a 500mm buffer each side of the vehicle;</u> (e) <u>A clearance height of no less than 4 metres.</u>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
28	RPROZ-S2	Support in part	<p>Fire and Emergency promotes defensible spaces around rural dwellings⁶.</p> <p>Based on the definition of ‘forestry’ under the UHCDP, RPROZ-S2 would apply to plantation forestry (being the production of timber or other forest products). However, Fire and Emergency note that the use of the term ‘plantation forestry’ is being introduced via PC50 therefore clarity is requested around the intended management of forestry through the district plan.</p> <p>As such, Fire and Emergency request that RPROZ-S2 is amended to reflect the separation requirements of the NES-PF in relation to dwellings and align with best practice fire risk management through the provision of appropriate separation distances, providing defensible spaces and thus reducing the risk of fire spread between land uses.</p>	<p>Amend RPROZ-S2 as follows:</p> <p>Setbacks</p> <p>...</p> <ol style="list-style-type: none"> 2. New residential units shall not be built within 440m of an existing forest. <p>...</p>
29	RPROZ-S5	Support in part	<p>Fire and Emergency note that the Code of Practice for Civil Engineering Works only covers the flow and design of firefighting water supplies for reticulated systems. Furthermore, there is a gap within the provisions of PC50 for the provision of a firefighting water supply for non-residential developments. It is vital that all developments are provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p>	<p>Amend RPROZ-S5 as follows:</p> <p>Water supply, stormwater and wastewater</p> <ol style="list-style-type: none"> 1. All activities shall comply with the water supply, stormwater and wastewater standards in the Code of Practice for Civil Engineering Works. 2. New buildings and development must be designed to ensure that the stormwater runoff from all new impervious surfaces will be disposed of or stored on-site and released at a rate that does not exceed the peak stormwater runoff when

⁶ <https://www.fireandemergency.nz/home-fire-safety/fire-safety-checklists/rural-home-fire-safety-checklist/>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			Fire and Emergency seeks an amendment to RPROZ-S5 that requires all land use activities in the Rural Production zone to provide a suitable firefighting water supply.	<p>compared to the pre-development situation for the 10% and 1% rainfall annual exceedance probability event.</p> <p>3. All new buildings (other than residential units not connected to Council's reticulated water supply (see RPROZ-S12)) and development must be provided with a firefighting water supply in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p>
30	RPROZ-S6	Support in part	<p>Fire and Emergency support best practice management in relation to plantation forestry.</p> <p>Fire and Emergency note that RPROZ-S6 is not consistent with the requirements of the NES-PF, specifically Section 14 of the NES-PF which sets out requirements for setbacks from adjoining properties, dwellings, and urban areas. Fire and Emergency recommend UHCC further consider the requirements of the NES-PF to avoid any unnecessary duplication. Notwithstanding this, Fire and Emergency request that RPROZ-S6 is amended to reflect the separation requirements of the NES-PF in relation to dwellings and align with best practice fire risk management through the provision of appropriate separation distances, providing defensible spaces and thus reducing the risk of fire spread between land uses.</p>	<p>Amend RPROZ-S6 as follows:</p> <p>Plantation forestry</p> <ol style="list-style-type: none"> 1. Forest owners and managers are expected to comply with the management and operational practices in the New Zealand Forest Code of Practice. 2. There shall be a 10m non-millable buffer from any waterbody with a width greater than 1m. 3. A buffer width of at least 1440m is to be provided to any existing residential unit on another site.
31	RPROZ-S12	Support in part	Fire and Emergency strongly support the requirement for residential units to be provided with a domestic fire sprinkler system that is connected to a firefighting water supply in	<p>Amend as follows:</p> <p>RPROZ-S12</p>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			<p>accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>Sprinkler systems provide a highly effective means of early fire suppression which can enable the fire to be controlled, or even extinguished, early in its development. Sprinklers quickly apply water directly to the source of the fire and are the most reliable method to control a fire. This minimises the risk of loss of life, property damage and adverse effects on the wider environment (e.g. the spread of fire through surrounding vegetation). This also has the benefit of substantially lowering the volume of on-site firefighting water supply required for a sprinklered dwelling.</p> <p>However, Fire and Emergency note that NZS 4541:2013 has since been superseded by NZS 4541:2020 and has requested relief to this effect.</p>	<p>Water supply and firefighting sprinkler system for residential units.</p> <ol style="list-style-type: none"> 1. Each residential unit that is not connected to Council's reticulated water supply must have the following installed: <ol style="list-style-type: none"> a. a self-sufficient potable water supply with a minimum volume of 38,000L; and b. a domestic fire sprinkler system in accordance with NZS 4541:2013 NZS 4541:2020 that is connected to a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.
32	New rule	-	<p>Fire and Emergency seek the inclusion of a new rule for emergency service facilities being a permitted activity in the Rural Production Zone. 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 any new fire stations within the district as development progresses. Fire and Emergency consider the permitted activity standards within the Rural Production</p>	<p>Add a new rule which establishes emergency service facilities as a permitted activity within the Rural Production zone.</p>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			chapter will appropriately manage the effects of fire stations within the zone.	
RLZ – Rural Lifestyle Zone				
33	RLZ-O5 Infrastructure	Support in part	<p>Fire and Emergency support RLZ-O5 insofar as the objective requires the provision of appropriate infrastructure, which would include reticulated water supply and roads, for existing and planned activities within the rural environment.</p> <p>However, Fire and Emergency note that 'infrastructure' is not defined, and clarity is required.</p> <p>In the absence of a definition, Fire and Emergency request an amendment to RLZ-O5 to include 'on-site services' required to support existing and planned activities and would include non-reticulated firefighting water supply such as private water supply tanks that are generally anticipated within unreticulated rural areas. As such, this will promote the health, safety and wellbeing of the rural communities.</p>	<p>Amend objective as follows:</p> <p>Appropriate infrastructure <u>and on-site services are</u> is provided to support existing and planned activities meeting the needs of the rural community.</p>
34	RLZ-P1 Appropriate activities	Oppose	<p>Fire stations may have a functional need to be located in certain areas, including the Rural Lifestyle Zone. 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 minimise response times so that they can efficiently and effectively respond to emergency call outs in a timely way, thus avoiding or mitigating the potential</p>	<p>Amend policy as follows:</p> <p>RLZ-P1 Appropriate activities</p> <p>Enable activities that are compatible with the purpose of the Rural lifestyle zone, while ensuring that their design, scale and intensity is appropriate to the rural environment, including:</p> <p>...</p> <p><u>Z. Emergency service facilities</u></p> <p>Where they:</p>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			<p>for adverse effects associated with fire hazard and other emergencies.</p> <p>The content of RLZ-P1 does not provide for fire stations (which fall under the definition of a community facility in the District Plan) as an appropriate activity within the Rural Lifestyle Zone.</p>	<p>...</p> <p><u>8. Provide for the health, safety and well-being of the community.</u></p>
35	RLZ-R2	Support in part	Fire and Emergency support RLZ-R5, subject to the relief sought under RLZ-S1, RLZ-S2, RLZ-S5, RLZ-S6 and RLZ-S11 being accepted.	No relief sought.
36	New rule	-	Fire and Emergency seek the inclusion of a new rule for emergency service facilities being a permitted activity in the Rural Lifestyle Zone. 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 any new fire stations within the district as development progresses. Fire and Emergency consider the permitted activity standards within the Rural Lifestyle chapter will appropriately manage the effects of fire stations within the zone.	Inclusion of a new rule which establishes emergency service facilities as a permitted activity within the Rural Lifestyle zone.
37	RLZ-S1	Support in part	For fire appliances to access an emergency, adequate accessway width, height clearance, gradient and turning circles are necessary to support the operational requirements of Fire	Amend RLZ-S1 as follows:

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			<p>and Emergency. These requirements are set out in submission point 2 above.</p> <p>As TP-S10 and SUB-RUR-S3 relate to subdivision only, it is important that the access standards for land use activities in RLZ are adequate for emergency services. Fire and Emergency request that all land use activities are subject to RLZ-S1 and RLZ-S1 be amended to reflect the minimum requirements for emergency service vehicles.</p>	<p>All accessways and manoeuvring areas shall be formed and surfaced in accordance with the Code of Practice for Civil Engineering Works <u>and have:</u></p> <p>(a) <u>An access width of no less than 4 metres;</u></p> <p>(b) <u>Be formed and constructed with a sealed surface and corridor that meets the full access and manoeuvring requirements associated with the activities it services;</u></p> <p>(c) <u>A maximum negotiable gradient not exceeding 16%;</u></p> <p>(d) <u>Where appropriate, be designed with additional width necessary to accommodate the tracking curve of a 12.6 metre long rigid emergency service vehicle with a minimum of a 500mm buffer each side of the vehicle;</u></p> <p>(e) <u>A clearance height of no less than 4 metres.</u></p>
38	RLZ-S2	Support in part	<p>Fire and Emergency promotes defensible spaces around rural dwellings⁷.</p> <p>Based on the definition of 'forestry' under the UHCDP, RLZ-S2 would apply to plantation forestry (being the production of timber or other forest products). However, Fire and Emergency note that the use of the term 'plantation forestry' is being introduced via PC50 therefore clarity is requested around the intended management of forestry through the district plan.</p>	<p>Amend RLZ-S2 as follows:</p> <p>Setbacks</p> <ol style="list-style-type: none"> The setback distance for buildings from all boundaries shall not be less than 12m. New residential units shall not be built within 440m of an existing forest. <p>...</p>

⁷ <https://www.fireandemergency.nz/home-fire-safety/fire-safety-checklists/rural-home-fire-safety-checklist/>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			As such, Fire and Emergency request that RLZ-S2 is amended to reflect the separation requirements of the NES-PF in relation to dwellings and align with best practice fire risk management through the provision of appropriate separation distances, providing defensible spaces and thus reducing the risk of fire spread between land uses.	
39	RLZ-S5	Support in part	<p>Fire and Emergency note that the Code of Practice for Civil Engineering Works only covers the flow and design of firefighting water supplies for reticulated systems. Furthermore, there is a gap within the provisions of PC50 for the provision of a firefighting water supply for non-residential developments. It is vital that all developments, particularly in non-reticulated areas, are provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>Fire and Emergency seeks an amendment to RLZ-S5 that requires all land use activities in the Rural Lifestyle zone be provided with a suitable a firefighting water supply.</p>	<p>Amend RLZ-S5 as follows:</p> <p>Water supply, stormwater and wastewater</p> <ol style="list-style-type: none"> 1. All activities shall comply with the water supply, stormwater and wastewater standards in the Code of Practice for Civil Engineering Works. 2. New buildings and development must be designed to ensure that the stormwater runoff from all new impervious surfaces will be disposed of or stored on-site and released at a rate that does not exceed the peak stormwater runoff when compared to the pre-development situation for the 10% and 1% rainfall annual exceedance probability event. 3. <u>All new buildings (other than residential units not connected to Council's reticulated water supply (see RLZ-S11)) and development must be provided with a firefighting water supply in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u>
40	RLZ-S6	Support in part	Fire and Emergency support best practice management in relation to plantation forestry.	<p>Amend RLZ-S6 as follows:</p> <p>Plantation forestry</p>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			<p>Fire and Emergency note that RLZ-S6 is not consistent with the requirements of the NES-PF, specifically Section 14 of the NES-PF which sets out requirements for setbacks from adjoining properties, dwellings, and urban areas. Fire and Emergency recommend UHCC further consider the requirements of the NES-PF to avoid any unnecessary duplication. Notwithstanding this, Fire and Emergency request that RLZ-S6 is amended to reflect the separation requirements of the NES-PF in relation to dwellings and align with best practice fire risk management through the provision of appropriate separation distances, providing defensible spaces and thus reducing the risk of fire spread between land uses.</p>	<ol style="list-style-type: none"> 1. Forest owners and managers are expected to comply with the management and operational practices in the New Zealand Forest Code of Practice. 2. There shall be a 10m non-millable buffer from any waterbody with a width greater than 1m. 3. A buffer width of at least 1440m is to be provided to any existing residential unit on another site.
41	RLZ-S11	Support in part	<p>Fire and Emergency strongly support the requirement for residential units to be provided with a domestic fire sprinkler system that is connected to a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>Sprinkler systems provide a highly effective means of early fire suppression which can enable the fire to be controlled, or even extinguished, early in its development. Sprinklers quickly apply water directly to the source of the fire and are the most reliable method to control a fire. This minimises the risk of loss of life, property damage and adverse effects on the wider environment (e.g. the spread of fire through surrounding vegetation). This also has the benefit of substantially lowering the volume of on-site firefighting water supply required for a sprinklered dwelling.</p>	<p>Amend as follows:</p> <p>RLZ-S11</p> <p>Water supply and firefighting sprinkler system for residential units.</p> <ol style="list-style-type: none"> 1. Each residential unit that is not connected to Council's reticulated water supply must have the following installed: <ol style="list-style-type: none"> a. a self-sufficient potable water supply with a minimum volume of 38,000L; and b. a domestic fire sprinkler system in accordance with NZS 4544:2013 NZS 4544:2020 that is connected to a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			However, Fire and Emergency note that NZS 4541:2013 has since been superseded by NZS 4541:2020 and has requested relief to this effect.	
42	New rule	-	Fire and Emergency seek the inclusion of a new rule for emergency service facilities being a permitted activity in the Settlement Zone. 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 any new fire stations within the district as development progresses. Fire and Emergency consider the permitted activity standards within the Settlement chapter will appropriately manage the effects of fire stations within the zone.	Inclusion of a new rule which establishes emergency service facilities as a permitted activity within the Settlement zone.
SETZ- Settlement Zone				
43	SETZ-O3 Infrastructure	Support in part	<p>Fire and Emergency support SETZ-O3 insofar as the objective requires the provision of appropriate infrastructure, which would include reticulated water supply and roads, for existing and planned activities within the rural environment.</p> <p>However, Fire and Emergency note that 'infrastructure' is not defined, and clarity is required.</p> <p>In the absence of a definition, Fire and Emergency request an amendment to SETZ-O3 to include 'on-site services' required</p>	<p>Amend objective as follows:</p> <p>Appropriate infrastructure and on-site services are is provided to support existing and planned activities meeting the needs of the rural community.</p>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			to support existing and planned activities and would include non-reticulated firefighting water supply such as private water supply tanks that are generally anticipated within unreticulated rural areas. As such, this will promote the health, safety and wellbeing of the rural communities.	
44	SETZ-P1 Appropriate activities	Support in part	<p>Fire stations may have a functional need to be located in certain areas, including the Settlement Zone. 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 minimise response times so that they 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>The content of SETZ-P1 does not provide for fire stations (which fall under the definition of a community facility in the District Plan) as an appropriate activity within the Settlement Zone.</p>	<p>Amend policy as follows:</p> <p>SETZ-P1 Appropriate activities</p> <p>Enable activities that are compatible with the purpose of the Settlement zone, while ensuring the design, scale and intensity is appropriate, including:</p> <p>...</p> <p><u>5. Emergency service facilities</u></p> <p>Where they:</p> <p>...</p> <p><u>8. Provide for the health, safety and well-being of the community.</u></p>
45	SETZ-R2	Support in part	Fire and Emergency support SETZ-R2, subject to the relief sought under SETZ-S1, SETZ-S2, SETZ-S5 and SETZ-S9 being accepted.	No relief sought.
46	SETZ-S1	Support in part	For fire appliances to access an emergency, adequate accessway width, height clearance, gradient and turning circles are necessary to support the operational requirements of Fire	Amend SETZ-S1 as follows:

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			<p>and Emergency. These requirements are set out in submission point 2 above.</p> <p>As TP-S10 and SUB-RUR-S3 relate to subdivision only, it is important that the access standards for land use activities in SETZ are adequate for emergency services. Fire and Emergency request that all land use activities are subject to SETZ-S1 and SETZ-S1 be amended to reflect the minimum requirements for emergency service vehicles.</p>	<p>All accessways and manoeuvring areas shall be formed and surfaced in accordance with the Code of Practice for Civil Engineering Works <u>and have:</u></p> <ul style="list-style-type: none"> (a) <u>An access width of no less than 4 metres.</u> (b) <u>Be formed and constructed with a sealed surface and corridor that meets the full access and manoeuvring requirements associated with the activities it services;</u> (c) <u>A maximum negotiable gradient not exceeding 16%;</u> (d) <u>Where appropriate, be designed with additional width necessary to accommodate the tracking curve of a 12.6 metre long rigid emergency service vehicle with a minimum of a 500mm buffer each side of the vehicle;</u> (e) <u>A clearance height of no less than 4 metres.</u>
47	SETZ-S2	Support in part	<p>Fire and Emergency promotes defensible spaces around rural dwellings⁸.</p> <p>Based on the definition of 'forestry' under the UHCDP, SETZ-S2 would apply to plantation forestry (being the production of timber or other forest products). However, Fire and Emergency note that the use of the term 'plantation forestry' is being introduced via PC50 therefore clarity is requested around the intended management of forestry through the district plan.</p>	<p>Amend SETZ-S2 as follows:</p> <p>Setbacks</p> <p>...</p> <p>2. New residential units shall not be built within 440m of an existing forest.</p> <p>...</p>

⁸ <https://www.fireandemergency.nz/home-fire-safety/fire-safety-checklists/rural-home-fire-safety-checklist/>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			As such, Fire and Emergency request that SETZ-S2 is amended to reflect the separation requirements of the NES-PF in relation to dwellings and align with best practice fire risk management through the provision of appropriate separation distances, providing defensible spaces and thus reducing the risk of fire spread between land uses.	
48	SETZ-S5	Support in part	<p>Fire and Emergency note that the Code of Practice for Civil Engineering Works only covers the flow and design of firefighting water supplies for reticulated systems. Furthermore, there is a gap within the provisions of PC50 for the provision of a firefighting water supply for non-residential developments. It is vital that all developments, particularly in non-reticulated areas, are provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>As such, Fire and Emergency seeks an amendment to SETZ-S5 that ensures all land use activities in the Settlement zone are provided with a suitable a firefighting water supply, and access to that supply.</p>	<p>Amend SETZ-S5 as follows:</p> <p>Water supply, stormwater and wastewater</p> <ol style="list-style-type: none"> 1. All activities shall comply with the water supply, stormwater and wastewater standards in the Code of Practice for Civil Engineering Works. 2. New buildings and development must be designed to ensure that the stormwater runoff from all new impervious surfaces will be disposed of or stored on-site and released at a rate that does not exceed the peak stormwater runoff when compared to the pre-development situation for the 10% and 1% rainfall annual exceedance probability event. 3. <u>All new buildings (other than residential units not connected to Council's reticulated water supply (see RLZ-S11)) and development must be provided with a firefighting water supply in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u>
49	SETZ-S9	Support in part	Fire and Emergency strongly support the requirement for residential units to be provided with a domestic fire sprinkler system that is connected to a firefighting water supply in	<p>Amend as follows:</p> <p>SETZ-S9</p>

ID	Proposed provision	Support / oppose	Reason for submission	Requested relief
			<p>accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>Sprinkler systems provide a highly effective means of early fire suppression which can enable the fire to be controlled, or even extinguished, early in its development. Sprinklers quickly apply water directly to the source of the fire and are the most reliable method to control a fire. This minimises the risk of loss of life, property damage and adverse effects on the wider environment (e.g. the spread of fire through surrounding vegetation). This also has the benefit of substantially lowering the volume of on-site firefighting water supply required for a sprinklered dwelling.</p> <p>However, Fire and Emergency note that NZS 451:2013 has since been superseded by NZS 4541:2020 and has requested relief to this effect.</p>	<p>Water supply and firefighting sprinkler system for residential units.</p> <ol style="list-style-type: none"> 1. Each residential unit that is not connected to Council's reticulated water supply must have the following installed: <ol style="list-style-type: none"> a. a self-sufficient potable water supply with a minimum volume of 38,000L; and b. a domestic-fire sprinkler system in accordance with NZS 4541:2013 NZS 4541:2020 that is connected to a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.