

Submission on the notified Proposed Lower Hutt District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

To: Hutt City Council

Name of submitter: Fire and Emergency New Zealand

- This is a submission on the Proposed Lower Hutt District Plan (PDP).
- Fire and Emergency New Zealand (Fire and Emergency) could not gain an advantage in trade competition through this submission.
- The specific provisions of the PDP that Fire and Emergency's submission relates to are set out in **Appendix A**.

Fire and Emergency's submission is:

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

Fire and Emergency also has secondary functions to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform its main functions efficiently and effectively. These secondary functions³ are:

- (a) *responding to medical emergencies; and*
- (b) *responding to maritime incidents; and*

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

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

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

- (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.

With the wider mandate and changing nature of Fire and Emergency responses, the volume of incidents that Fire and Emergency responds to has grown, as has the range of incident types.⁴

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

Territorial authorities have a role in ensuring that Fire and Emergency, as an emergency service provider, can continue to operate effectively and efficiently in a changing urban environment. As such, Fire and Emergency has an interest in the PDP to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting and property requirements.

This submission seeks to enable Fire and Emergency to carry out its requirements under the Fire and Emergency New Zealand Act 2017 more effectively in the protection of lives, property, and the surrounding environment. This submission addresses matters relating to activities required to be undertaken to enable effective firefighting training, emergency response and to provide for the health and safety of people and communities in the Hutt city.

There are seven existing fire stations in Hutt City, as follows:

Table 1: Details of the existing fire stations in the Hutt city, including relevant zoning / overlays under the City of Lower Hutt District Plan (ODP) and PDP.

Fire station	Legal description	Physical address	ODP	PDP
Eastbourne Volunteer Fire Brigade	Lot 3 DP 55283	2 Makaro Street, Eastbourne	Zone Medium Density Residential Overlays <ul style="list-style-type: none"> Tsunami Evacuation Zone (orange) Specific Height Control Overlay 	Zone Medium Density Residential Overlays <ul style="list-style-type: none"> Flood Hazard Overlay (Type – Low) Medium Coastal Inundation Hazard Overlay Coastal Environment Specific height control overlay (18 metres)
Wainuiomata Volunteer Fire Brigade	Lot 2 DP 17210	34 Fitzherbert	Zone Medium Density Residential Overlays	Zone Mixed Use Zone Overlays

⁴ 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 2023/24, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined. (Source: NZ Fire Service Annual Report 2023/24)

Fire station	Legal description	Physical address	ODP	PDP
		Road, Wainuiomata	<ul style="list-style-type: none"> Specific Height Control Overlay Flood Hazard Overlay 	<ul style="list-style-type: none"> Flood Hazard Overlay (Type – Low, Medium & High) Liquefaction Hazard Overlay Slope Assessment Overlay Specific height control overlay (12 metres)
Wainuiomata Bush Voluntary Rural Fire Force	Lot 2 DP 78612	23 The Strand, Wainuiomata	Zone Suburban Mixed Use Overlays <ul style="list-style-type: none"> Specific Height Control Overlay Flood Hazard Overlay 	Zone Mixed Use Zone Overlays <ul style="list-style-type: none"> Flood Hazard Overlay (Type – Low, Medium & High) Liquefaction Hazard Overlay Slope Assessment Overlay Specific height control overlay (12 metres)
Seaview Station	Lot 2 DP 55311	51 Parkside Road, Gracefield	Zone Special Business Zone Overlay <ul style="list-style-type: none"> Tsunami Evacuation Zone (orange) Flood Hazard Overlay Coastal Hazard Overlay (inundation) Coastal Hazard overlay (Tsunami) 	Zone Heavy Industrial Zone Overlay <ul style="list-style-type: none"> Medium Coastal Inundation Hazard Overlay Flood Hazard Overlay (Type – Low, Medium & High) Liquefaction Hazard Overlay High Tsunami Hazard Overlay Sites and Areas of Significance to Māori Industrial Main Through Route Frontage Overlay
Hutt City Station	Lot 1 DP 307532	39 Marsden Street, Melling	Zone General Business Overlay <ul style="list-style-type: none"> Tsunami Evacuation Zone (yellow) Flood Hazard Overlay 	Zone Light Industrial Zone Overlay <ul style="list-style-type: none"> Flood Hazard Overlay (Type – Low & Medium) Liquefaction Hazard Overlay
Avalon Station	Lots 3 & 4 DP 8651	955 High Street, Avalon	Zone Suburban Mixed Use Overlay <ul style="list-style-type: none"> Flood Hazard Overlay 	Zone Mixed Use Zone Overlay <ul style="list-style-type: none"> Flood Hazard Overlay (Type – Low)
Stokes Valley Volunteer Fire Brigade	Lots 232-234 DP 8382	374 Stokes Valley Road, Stokes Valley	Zone Medium Density Residential Overlay <ul style="list-style-type: none"> Flood Hazard Overlay 	Zone Mixed Use Zone Overlay <ul style="list-style-type: none"> Flood Hazard Overlay (Type – Low, Medium & High) Specific height control overlay (12 metres)

Fire and Emergency has a Statement of Performance Expectations⁵ which sets out targets to delivering timely and effective fire response and suppression services as well as other services. Community need for Fire and Emergency services has been increasing, thereby increasing Fire and Emergency's presence on roads and need for fast and efficient access to incidents across the city.

Urban growth and intensification, coupled with the increasing rate of extreme weather events and risks from natural hazards as a result of climate change, and other environmental and demographic changes across communities is likely to result in a greater demand on emergency services and consequently can affect response times if not managed.

Fire and Emergency's response time commitments to the government and community are key determinants for the location of new, or expansion of existing fire stations. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and maintain appropriate response times and efficiently provide for the health and safety of people and communities. As urban areas develop and intensify, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is critical for the health, safety and wellbeing of people and communities. 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 PDP are therefore the best way to facilitate the development of new emergency service facilities and / or re-development / expansion of existing emergency service facilities.

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

Appendix A sets out the details of Fire and Emergency's submission, including the amendments to specific provisions in the PDP sought by Fire and Emergency, and the reasons for the amendments. Many of these are in favour of retaining the proposed provisions.

Fire and Emergency wishes to be heard in support of its submission.

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



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

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⁵ <https://www.fireandemergency.nz/assets/Documents/About-FENZ/Key-documents/FENZ-SPE-24-25.pdf>

Appendix A: Fire and Emergency New Zealand (Fire and Emergency) submission on the Lower Hutt City Proposed District Plan (PDP)

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

ID	Proposed provision	Position	Submission	Requested relief
PART 1 – INTRODUCTION AND GENERAL PROVISIONS				
Interpretation – Definitions				
1	Accessory building	Support	Fire and Emergency supports the definition for ‘accessory building’ as it best defines detached ancillary buildings that excludes any minor residential unit. Accessory buildings may be subject to specific fire protection requirements including firefighting water supply and access to reduce any potential fire risks.	Retain as notified.
2	Emergency service facility	Support	Fire and Emergency supports the definition for ‘emergency service facility’ as it includes fire stations, administration related to emergency services, vehicle and equipment storage and maintenance, and personnel training. It is vital that the PDP provides for emergency service facilities to better provide for the health, safety, and wellbeing of communities by enabling the establishment of fire stations and the continued operation of existing stations.	Retain as notified.
3	Functional need	Support	Fire and Emergency supports the definition of ‘functional need’ as it defines and recognises activities that have a need to be in certain locations. Fire stations may have a functional need to be located in certain areas, including those with increased risk of natural hazards. Locating fire stations where they have a functional need can help reduce response times to fire events and protect the community more efficiently.	Retain as notified.
4	Habitable room	Support	Fire and Emergency supports the definition for ‘habitable room’ as it includes occupied rooms. Habitable rooms may be subject to specific fire protection requirements including firefighting water supply and access to reduce any potential fire risks.	Retain as notified.
5	Hazardous substance	Support	Fire and Emergency supports the definition of ‘hazardous substance’ being consistent with section 2 of the RMA and reference to other relevant legislation including the ‘Hazardous Substances and New Organisms Act 1996’ as a hazardous substance and the ‘Hazardous Substances and New Organisms Act 1996’.	Retain as notified.
6	Natural hazard	Support	Fire and Emergency supports the definition of ‘natural hazard’ being consistent with section 2 of the RMA.	Retain as notified.
7	Operational need	Support	Fire and Emergency supports the definition of ‘operational need’ as it defines and recognises activities that have a need to operate in certain locations where the activity is specifically required. Fire and Emergency may need to locate and operate in certain areas for logistical reasons in the interest of public health and safety, including areas with increased risk of natural hazards. Allowing fire stations to operate where there is an operational need can help reduce response times to fire events and protect the community more efficiently.	Retain as notified.
8	Residential activity	Support	Fire and Emergency supports the definition of ‘residential activity’ as it includes the use of land and buildings that are primarily for living accommodation. Residential buildings are subject to specific fire protection requirements including firefighting water supply and access to protect people from fire risks.	Retain as notified.
9	Residential unit	Support	Fire and Emergency supports the definition of ‘residential unit’ as it includes buildings, or part of a building, used for a residential activity (as supported above) and occupied exclusively by one household. Residential units are subject to specific fire protection requirements including firefighting water supply and access to protect people from fire risks.	Retain as notified.
10	Significant hazardous facility	Support in part	<p>Fire and Emergency supports the definition of ‘significant hazardous facility’, in part, to the extent that it seeks to define, and subsequently manage, the effects of significant hazardous facilities on other land uses. However, Fire and Emergency notes the following:</p> <ol style="list-style-type: none"> 1. The current definition and referenced thresholds would not capture a number of hazardous facilities in the district which have the potential to generate an event which could cause harm to people and the environment. This includes facilities within the Hutt Valley which store and/or use vast quantities of such substances on site including laboratories and Mainfreight/chemical courier handling facilities. It is requested that the definition is expanded to capture such facilities to ensure that the associated District Plan rule framework has appropriate controls around expansion of such facilities (as per the amendments sought under the Hazardous Substances Chapter). 	<p>Amend as follows:</p> <p>Significant hazardous facilities Means any facility which involves one or more of the following activities:</p> <ol style="list-style-type: none"> 1. <u>Use and</u> Manufacturing of hazardous substances (including industries <u>using or</u> manufacturing agrochemicals, fertilisers, acids/alkalis, solvents or paints), 2. Oil and gas exploration and extraction facilities. 3. The storage/use of more than 50,000 litres of petrol, 4. The storage/use of more than 100,000 litres of diesel, 5. The storage/use of more than 6 tonnes of LPG,

ID	Proposed provision	Position	Submission	Requested relief
			<p>2. The definition does not include radiation and biological hazards and would fail to capture a number of facilities in the district which are a radiation hazard, such as the MSD Animal Health vaccine facility. Accordingly, an amendment to the definition is sought to appropriately capture such facilities.</p> <p>3. The storage and/or treatment of hazardous waste (including reuse and recycling facilities) or hazardous substances awaiting reuse, recycling or treatment should be included as a 'Significant Hazardous Facility'. This would provide HCC the ability to manage facilities that become high risk as a result of stockpiling materials. Where the economics of the business changes and they cannot process or dispose of materials, this can become a high fire risk and poses a risk to the health and safety of communities. Examples of this include E-waste recycling facilities which can result in the stockpiling of combustible electronics and disposal batteries. Fire and Emergency therefore requests that <i>'the storage and/or treatment of hazardous waste (including reuse and recycling facilities) or hazardous substances awaiting reuse, recycling or treatment'</i> should be listed as a significant hazardous facility.</p> <p>4. Emergency service facilities and associated firefighting activities involve the use and storage of hazardous substances at quantities that are considered minor. Fire and Emergency's firefighting chemicals do not have the types of hazard classifications that are covered by the WorkSafe Major Hazardous Facilities regulations, so Fire and Emergency sites would never be a Major Hazardous Facilities because of them. The only substances that Fire and Emergency uses that trigger this is oxygen for medical purposes, and Fire and Emergency facilities would never come close to 200 tonne limit for a lower tier Major Hazardous Facilities. However, there are circumstances where Fire and Emergency needs to temporarily store large quantities of product in an emergency. Based on this definition, it is possible that PDP may not enable this and could affect Fire and Emergency's ability to operate as effectively as needed. In a major event, Fire and Emergency would try to have several days stock at hand to respond to rapidly changing intensity of the fire. In terms of quantities, this could be up to 15-30,000kg or L of product on site.</p> <p>5. Fire and Emergency also holds stocks of petrol and diesel by the pallet. This is used to power generators and pumps and for constructing fire breaks. Fire and Emergency brings in resources from across the country for these events; even for smaller events to ensure an effective response. It is therefore important that Fire and Emergency is not restricted by the PDP. It is noted that Fire and Emergency will operate all emergency responses under the Health and Safety at Work Act 2015 and Hazardous Substances and New Organisms Act 1996 regulations. These regulations include storage, secondary containment, handling, packaging, signage, labelling, emergency management etc. Fire and Emergency therefore seeks those facilities involving 'Emergency response activities' are excluded from being a 'Significant hazardous facility' under the PDP.</p>	<p>6. Galvanising plants, 7. Electroplating and metal treatment facilities, 8. Tanneries 9. Timber treatment, 10. Freezing works and rendering plants, 11. Wastewater treatment plants, 12. Metal smelting and refining (including battery refining or recycling) 13. Milk treatment plants, 14. Fibreglass manufacturing, 15. Polymer foam manufacturing, and 16. Asphalt/bitumen manufacture or storage. 17. <u>Laboratories.</u> 18. <u>Mainfreight.</u> 19. <u>Ports.</u> 20. <u>Universities.</u> 21. <u>Fine chemical users or producers.</u> 17. <u>The storage and/or use of radioactive materials or radiation sources.</u> 18. <u>The storage and/or treatment of hazardous substances at waste disposal, reuse or recycling facilities (including electronic waste and items containing disposal batteries) or the stockpiling of hazardous substances awaiting reuse, recycling, or treatment at such facilities).</u> <u>The following activities are not considered to be significant hazardous facilities:</u> • <u>the incidental use and storage (including for disposal) of hazardous substances for emergency service activities.</u></p>
11	Structure	Support	Fire and Emergency supports the definition for 'structure' as it defines buildings that are fixed / located on land. Structures may be subject to specific fire protection requirements including firefighting water supply and access to reduce any potential fire risks.	Retain as notified.
12	Temporary activity	Support	Fire and Emergency supports the definition of 'temporary activity' as it provides for temporary activities, including emergency response training. In order to ensure an efficient and effective emergency response, firefighter training is an essential activity undertaken by Fire and Emergency. Firefighter training may include live fire training and equipment training both on and off site. It is noted that the 'temporary activity' definition would relate to off-site training only, as it relates to activities which are not part of, or ancillary to, a permanent activity on the same site (such as a fire station). Notwithstanding, on-site firefighting training is nevertheless provided for under the 'emergency services facility' definition.	Retain as notified.
PART 2: DISTRICT-WIDE MATTERS				
SD – Strategic Direction				
13	CCSD-O2 Natural Hazards	Support	Fire and Emergency supports CCSD-O2 insofar as it seeks to protect people, communities, and property from natural hazards and the potential effects of climate change. Natural hazards are defined to include fire, and Fire and Emergency has a role in responding to fire and other natural hazard emergencies.	Retain as notified.

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14	INFSD-O1 Integration INFSD-O2 Coordination	Support	Fire and Emergency supports INFSD-O1 and O2 as it recognises the benefits of integrated infrastructure including transport and three waters servicing. Fire and Emergency supports HCC's objective to secure a water supply distribution system to serve new land use and development, as this is critical to providing an adequate firefighting water supply. For Fire and Emergency, it is important that adequate infrastructure is in place before the development of new areas, particularly those that are intended to be serviced with a reticulated water supply.	Retain as notified.
15	INFSD-O4 Multi-Modal Land Transport Network	Support	Fire and Emergency supports INFSD-O4 insofar as it promotes the operation of a safe and efficient transport network.	Retain as notified.
16	UDSD-O1 Well- Functioning Urban Environment	Support	Fire and Emergency supports UDSD-O1 insofar as it promotes the creation of urban environments that provide for the health and safety of communities, now and into the future.	Retain as notified.
17	UDSD-O2 Outcomes for Well-Functioning Urban Environments	Support	Fire and Emergency supports UDSD-O2 insofar as it promotes the development of urban environments that serviced by the necessary infrastructure appropriate to the intensity, scale, and function of the development.	Retain as notified.
INF – Infrastructure				
18	INF-O2 Adverse effects of infrastructure	Support	Fire and Emergency supports INF-O2 insofar that the objective recognises the functional and operational needs of infrastructure while managing the adverse effects of the infrastructure on the environment. It is important that any adverse effects of infrastructure are balanced against the functional and operational needs of such infrastructure. In particular, the benefits of the provision of a reticulated water supply network and an efficient transport network and vehicle access for the purposes of an efficient emergency response should be recognised when assessing any associated adverse environmental effects.	Retain as notified.
19	INF-O3 Infrastructure availability and capacity	Support	Fire and Emergency supports INF-O3 insofar as the objective promotes safe, resilient, sustainable, and efficient infrastructure that can meet the needs of existing and planned subdivision, use, and development.	Retain as notified.
20	INF-O4 Transport network	Support	Fire and Emergency supports INF-O4 insofar as it promotes the development of an effective, accessible, and integrated transport network.	Retain as notified.
21	INF-P1 Recognise benefits of infrastructure	Support	Fire and Emergency supports INF-P1 insofar as the policy recognises the benefit that infrastructure provides to public health and safety, including providing a lifeline during emergencies.	Retain as notified.
22	INF-P3 Planning and delivery of infrastructure	Support	Fire and Emergency supports INF-P2 insofar as it promotes the efficient coordination of infrastructure planning and delivery with land use, subdivision, development, and urban growth.	Retain as notified.
23	INF-P5 Adverse effects of infrastructure	Support	Fire and Emergency supports INF-P5 insofar that the policy manages adverse effects of infrastructure in relation to the safe and efficient operation of existing infrastructure, as well as the health, well-being and safety of people and communities. It is important that new infrastructure development does not constrain or compromise the safe and efficient operation of the existing transport network or water supply network level of service available for firefighting. This will ensure that adverse effects on the health, well-being and safety of communities are avoided.	Retain as notified.
24	INF-P7 Upgrading and developing the transport network	Support in part	Fire and Emergency supports INF-P7 insofar as it promotes the upgrade and development of the transport network where the safe and efficient operation of the network is not compromised, and connectivity is maintained or enhanced. So that this policy has a suitable matter of discretion for non-compliant road designs with respect to emergency appliance access, an amendment is sought to the policy wording to ensure that adequate space is allocated in the road corridor to provide for firefighting purposes. This policy change also supports standard INF-S15 and is also linked to non-compliance with rules in the Subdivision chapter.	<p>Amend as follows: INF-P7 Upgrading and developing the transport network <i>Providing for upgrading and developing the transport network where, as far as practicable, it:</i></p> <ol style="list-style-type: none"> 1. 2. 3. <i>Improves connectivity for and integration between all transport modes, including by:</i> <ol style="list-style-type: none"> a. <i>Providing...</i> b. <i>Allocating adequate space in the road corridor for walking, cycling, infrastructure, streetlighting and street trees as well as vehicles, <u>including emergency service/s vehicles</u>, and on-street parking, and...</i>

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25	INF-S15 Road design	Support in part	<p>By way of background, Fire and Emergency appliances have key access requirements including specific roading widths, surface, and gradients. These include, but are not limited to the following:</p> <ul style="list-style-type: none"> The minimum roading and carriageway widths should not be less than 4m for general appliance access. This width is required for firefighters to efficiently work around the fire appliance to access hoses and pumps. The maximum negotiable gradient is 1:5 (20%), but this is subject to the alignment of the road. Where ramped roads are curved, a maximum gradient of 1:10 (10%) would be required. The height clearance along roads (for example, trees) should not be less than 4m. For multi-storey buildings an aerial appliance may be necessary which requires a carriageway width of 6.5m. <p>Fire and Emergency supports INF-S15 insofar as it requires roads to be designed in accordance with NZS 4404:2010 Land Development and Subdivision Infrastructure (NZS 4404:2010). Table 3.2 in NZS 4404:2010 provides the design standards for roads, which are generally supported by Fire and Emergency. However, Fire and Emergency notes that there are some instances where Table 3.2 enables road design that would not enable access for emergency appliances. For example, where a road provides access to lifestyle or clustered housing (with 1-6 dwellings) a maximum gradient of 20% and minimum carriageway width of 2.5m is permitted. Fire and Emergency therefore supports the clause that requires all roads to have a minimum 4m permanently navigable movement lane to ensure suitable access for firefighting. However, for roads to be accessible to emergency appliances, it is also essential that roads have a maximum negotiable gradient and a minimum height clearance. An amendment to the standard is therefore sought to accommodate these requirements.</p>	<p>Amend as follows: INF-S15 Road design</p> <p>...</p> <p>2. All roads must be designed and constructed in accordance with NZS 4404:2010 Land Development and Subdivision Infrastructure, except where superseded by a clause in this standard.</p> <p>...</p> <p>6. All roads must be formed with a minimum 4m permanently navigable movement lane, <u>minimum 4m height clearance, and a maximum gradient of 20% for a straight ramp or 10% for curved ramps</u>, to ensure suitable access for firefighting.</p> <p>7. Street lighting must be provided in accordance with AS/NZS 1158:2005.</p> <p>8. Street trees must be provided in accordance with Table 1: Street trees specifications and Table 2: Street trees species list.</p> <p>9. All roads must be designed so that compliance is achieved with New Zealand Standard 6806:2010 Acoustics – Road-traffic noise – New and altered roads</p>
26	INF-S20 Removal of indigenous vegetation	Support	Fire and Emergency supports INF-S20 insofar as vegetation removal is exempt from the standard if the removal is required in accordance with sections 43 or 64 of the Fire and Emergency New Zealand Act 2017.	Retain as notified.
THW – Three Waters				
27	THW-O1 Infrastructure-enabled urban development THW-P1 Three waters infrastructure servicing	Support	Fire and Emergency supports THW-O1 and THW-P1 insofar as the objective and policy encourage future use and development of land in urban areas to be sufficiently supported by existing or planned three waters infrastructure capacity and level of service.	Retain as notified.
28	THW-P2 Three waters infrastructure capacity	Support	Fire and Emergency supports THW-P2 insofar as the policy only allows for use and development of land in urban areas, where there is insufficient three waters capacity, when the required three waters network is constructed prior to or in conjunction with the future development. It is noted that the policy also seeks to only allow for alternative solutions where a suitable level of service can be provided, and where it does not reduce pressures or compromises the ability of the network to service other permitted or established activities within the immediate area.	Retain as notified.
29	<p>THW-R1 New buildings (except accessory buildings), conversions of existing buildings and new allotments</p> <p>Residential Zones</p> <p>Commercial and Mixed Use Zones</p> <p>Industrial Zones</p> <p>Sport and Recreation Zone</p> <p>Hospital Zone</p> <p>Tertiary Education Zone</p>	Support in part	<p>Fire and Emergency supports THW-R1 insofar as new buildings and new allotments in the urban area are a permitted activity where a connection to an existing reticulated water supply is provided in accordance with Tables 6.1 and 6.2 in Chapter 6 of the Wellington Water Regional Standard for Water Services December 2021.</p> <p>However, an amendment is sought to ensure that this rule also requires a compliant water supply to also have suitable provision for firefighting water. Whilst it is noted that subdivision rules and standards, particularly standard SUB-S4, provide for firefighting water supply in a reticulated scenario, this applies to new allotments only. Relief is therefore sought to ensure that new buildings (for both residential and non-residential activities) benefit from an adequate firefighting water supply where an activity does not involve a subdivision consent.</p> <p>Furthermore, Fire and Emergency seeks an equivalent matter of discretion which will allow HCC to consider the extent to which a reticulated water supply, including firefighting water, is sufficient for the development or activity.</p>	<p>Amend as follows: THW-R1 New buildings (except accessory buildings) and conversions of existing buildings in an Urban Zone – Connections to the Reticulated Network</p> <p>1. Activity status: Permitted Where:</p> <p>a. Connection to the existing three water infrastructure achieves compliance with:</p> <p>i. For wastewater:</p> <p>ii. For water supply: The level of service in Chapter 6, Tables 6.1 and 6.2 of the Wellington Water Regional Standard for Water Services, December 2021, Version 3.0, <u>and comply with water supply requirements in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></p>

ID	Proposed provision	Position	Submission	Requested relief
				<p>2. Activity status: Restricted discretionary Matters of discretion are restricted to:</p> <p><u>5. The extent to which the proposed water supply, including for firefighting purposes, is sufficient for the development or activity it serves.</u></p>
30	New rule	-	<p>Fire and Emergency notes that the Three Waters Rules do not apply to rural areas and that the Wellington Water Regional Standard for Water Services December 2021 does not include provisions for unreticulated firefighting water supplies. Notwithstanding, there appears to be an absence of rules and standards within the District Plan that explicitly require a suitable firefighting water supply to be supplied in the rural zones where a subdivision is not involved in the proposed activity or development. To ensure that a suitable firefighting water supply is provided to serve new development in the rural environment, Fire and Emergency seeks the inclusion of a new rule to secure this. Fire and Emergency considers this will promote the health, safety and wellbeing of rural communities.</p> <p>Whilst it is noted that subdivision rules and standards, particularly standard SUB-S4, provide for firefighting water supply in a non-reticulated scenario, this applies to new allotments only. Relief is therefore sought to ensure that new buildings in the Rural Zones (for both residential and non-residential activities) benefit from an adequate firefighting water supply where an activity does not involve a subdivision consent. The proposed rule reflects the wording of standard SUB-S4 for consistency.</p> <p>It is noted that this proposed rule may be more appropriate in an alternative District Plan chapter such as the Rural Zones or Infrastructure.</p>	<p>Add a new rule as follows: <u>THW-RX New buildings (except accessory buildings), conversions of existing buildings and new allotments – Rural Zones</u></p> <p>1. Activity status: Permitted</p> <p>a) <u>Where a connection to a publicly owned reticulated water supply systems is available, all new allotments must:</u></p> <ol style="list-style-type: none"> <u>Be provided with a water supply connection at the allotment boundary, that meets the requirements of the Wellington Water Regional Standard for Water Services December 2021 (Chapter 6, Tables 6.1 and 6.2), and</u> <u>Comply with water supply requirements in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> <p>b) <u>Where a connection to a publicly owned reticulated water supply systems is not available, all allotments must:</u></p> <ol style="list-style-type: none"> <u>Be provided with access to a self-sufficient potable water supply with a minimum volume of 10,000L, and</u> <u>Comply with the water supply requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> <p>Matters of discretion:</p> <ol style="list-style-type: none"> <u>The extent to which the proposed water supply is sufficient for the development or activity it serves.</u> <u>The suitability of the proposed water supply for fire-fighting purposes, including effects on people's health and safety, and on property.</u> <u>Where a publicly owned reticulated system is not immediately available, but is likely to be in the near future, the appropriateness of temporary systems.</u> <u>Whether any site constraints make compliance impracticable.</u> <u>Any resulting changes to the level of service provided to other properties in that part of the network.</u>
TR31 – Transport				
31	TR-P3 Potentially incompatible activities and transport facilities	Support	Fire and Emergency supports Policy TR-P3 insofar as it seeks to only allow activities that do not meet standards for provision or design of transport facilities where safe and effective access for firefighting purposes is available.	Retain as notified.
32	TR-P6 Highly constrained roads	Support in part	Fire and Emergency supports Policy TR-P6 insofar as it only seeks to allow for new development within the Highly Constrained Roads Overlay where it can be demonstrated that additional motor vehicle trips will not worsen the safe operation of the road. A further consideration should be whether any new development has the potential to worsen the ability for emergency service(s) vehicles and/or personnel to access the site to respond to an emergency.	<p>Amend as follows: <u>TR-P6 Highly constrained roads</u> <u>Manage effects on the capacity and safe function on roads which are highly constrained by:</u></p> <ol style="list-style-type: none"> <u>Only allowing new land use and development within the Highly Constrained Roads Overlay where:</u> <u>It can be demonstrated that additional motor vehicle trips will not worsen the safe operation of the road, including the ability to retain suitable access for firefighting, or</u>
33	TR-R3 All activities – Trip generation	Support	Fire and Emergency supports Rule TR-R3 insofar as it permits new activities, subject to zoning, which do not exceed a motor vehicle trip generation threshold as set out in Table 8. For the purposes of the construction of a potential new fire station in any zone, Table 8 sets a permitted threshold of 200 vehicles trips/day for 'other activities' not otherwise listed.	Retain as notified.

ID	Proposed provision	Position	Submission	Requested relief
			The rule also proposes a matter of discretion for non-compliant trip generation which relates to whether safe and effective access can be provided and maintained for emergency service vehicles to the site and within the transport network.	
34	TR-S1 Pedestrian and cycling access	Support in part	<p>Fire and Emergency supports in part TR-S1 as it sets out requirements for sites which are only accessible via a pedestrian / cycling access. Specifically, Fire and Emergency support the requirements for firefighting access.</p> <p>Fire and Emergency also supports the matter of discretion which enables HCC to consider whether activities have safe and effective access for firefighting purposes.</p> <p>Fire and Emergency does, however, seek an amendment to TR-S1(2)(b) to clarify the points of measure to allow for sufficient and effective hose run from the road boundary to the furthest point of the building in a fire emergency. This acknowledges situations where a fire may be at the rear of a building, or the only access to a building is at the rear (furthest point) of a building. This is consistent with the Acceptable Solutions C/AS1 and C/AS2 under the Building Act.</p> <p>Fire and Emergency further seek that the width of pedestrian only access, where it is the sole access to the site, is a minimum of 3m to provide for the manoeuvring of emergency service personnel and equipment for firefighting, medical, rescue and other emergency responses.</p> <p>Fire and Emergency would welcome the opportunity to provide further rationale for this amendment, if required.</p>	<p>Amend as follows: TR-S1 Pedestrian and cycling access</p> <p>...</p> <p>2. For firefighting purposes, any pedestrian and cycling access which is the sole access to the activity or site, must comply with the following:</p> <ol style="list-style-type: none"> A fully reticulated water supply system including hydrants must be available within the road corridor to which the access connects, and The pedestrian and cycling access must be: <ol style="list-style-type: none"> Be no more than 75m in length measured from the road boundary to <u>the furthest point of</u> any existing building or proposed building platform on the site, <u>and</u> <u>Have a minimum clear width of 3m and a minimum height clearance of 4m.</u>
35	TR-S7 Driveways	Support in part	<p>Fire and Emergency supports TR-S7 insofar as it controls the design of on-site driveways and includes a matter of discretion regarding whether activities have safe and effective access for firefighting purposes. Furthermore, TR-S7(3) prescribes minimum driveway widths and clearance heights for a site located in an area where no fully reticulated water supply is available, or having a length greater than 75m in reticulated scenarios.</p> <p>However, Fire and Emergency seeks an amendment to TR-S7(3) to clarify the method in which the maximum length of the driveway is to be measured. This is critical to allow for sufficient and effective hose run from the road in an emergency which can access all sides of a building. The 75m length should therefore be measured between the road boundary and the furthest point of the building or building platform. This is consistent with Acceptable Solution C/AS1 and C/AS2.</p> <p>Additionally, Fire and Emergency notes that a gradient of up to 20% is allowed in some instances. As such, Fire and Emergency seeks a control on the gradient of on-site driveways to ensure emergency service vehicles can manoeuvre adequately.</p>	<p>Amend as follows: TR-S7 On-site driveways</p> <p>...</p> <p>2. Driveways must be designed to achieve the design speeds, minimum widths, pedestrian access, maximum gradients and seal requirements in Table-4: Design requirements for driveways</p> <p>3. Any driveway for a site located in an area where no fully reticulated water supply system is available, or having a length (see note 1) greater than 75m when connected to a road that has a fully reticulated water supply system including hydrants, must:</p> <ol style="list-style-type: none"> Have a minimum unobstructed width of 4m; Have a minimum formed width of 3.5m; Have a minimum height clearance of 4m; and Be designed to be free of obstacles that could hinder access for emergency service vehicles. <p>x. <u>Have a maximum gradient of 20% (straight ramps), or 10% (curved ramps).</u></p> <p><u>Note 1: For the purpose of measuring the driveway length under TR-S7(3), this should be measured from the road boundary to the furthest point of any existing building or proposed building platform on the site.</u></p>
HS – Hazardous Substances				
36	HS-R1 Additions or alterations to existing significant hazardous facilities	Support in part	<p>Fire and Emergency supports the expansion of existing significant hazardous facilities where there are appropriate controls in place to effectively manage the risk to public health, such as spill containment measures and emergency management. Under HS-R1, a significant hazardous facility can increase the volume of hazardous substances on site for up to 10% as a permitted activity, provided the risk profile does not change. So that the risk associated with the release or loss of control of hazardous substances is appropriately mitigated, Fire and Emergency request that any increase in the volume of hazardous substances is supported by a proportionate increase in spill containment measures, i.e. bunding and fire prevention materials.</p>	<p>Amend as follows: HS-R1 Additions or alterations to existing significant hazardous facilities</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <ol style="list-style-type: none"> The activity does not change the risk profile of the significant hazardous facility, as measured from 6 February 2025, and

ID	Proposed provision	Position	Submission	Requested relief
				<p>b. There is no more than a 10% increase in the volume of hazardous substances manufactured, used, stored, transported, or disposed of, as measured from 6 February 2025.</p> <p>c. <u>Where the volume of hazardous substances on-site is to be increased under b., the facility has a proportionate increase in spill containment volume and fire prevention materials.</u></p>
NH – Natural Hazards				
37	NH-P1 Risk-based approach	Support	Fire and Emergency supports NH-P1 insofar as it promotes a risk-based approach to the management of the effects of subdivision, use and development taking into consideration the operational and/or functional need for some activities (such as fire stations) to locate in Natural Hazard Overlays. Fire and Emergency has existing stations located within Natural Hazard Overlays and may have an operational and/or functional need to locate new stations in areas subject to Natural Hazard Overlays.	Retain as notified.
38	NH-P2 Levels of Risk NH-P7 Subdivision, use and development within the Fault Location Area NH-P9 Subdivision, use and development in the Flood Hazard Overlays	Support	Similar to the submission point on NH-P1, Fire and Emergency supports NH-P2, NH-P7 and NH-P9 insofar as it recognises that buildings and activities may have an operational and/or functional need to locate in high hazard areas, the Fault Location Area and the Flood Hazard Overlays.	Retain as notified.
39	NH-P11 Subdivision, Use and development in the Liquefaction Hazard Overlay	Support	Fire and Emergency supports NH-P11 insofar as it provides for emergency service facilities to locate in the Liquefaction Hazard Overlay providing it can be demonstrated that: <ul style="list-style-type: none"> occupants will be able to safely evacuate, post-disaster functionality can be maintained, and emergency vehicles will be able to service the impacted community by being able to enter and leave the site. 	Retain as notified.
HH – Historical Heritage				
40	HH-P6 Seismic strengthening, fire safety, and accessibility	Support	Fire and Emergency supports HH-P6 insofar as it provides for seismic strengthening, fire safety, and accessibility upgrades where historic heritage values are protected, as well as the continued use of the building or structure.	Retain as notified.
ECO – Ecosystems and Indigenous Biodiversity				
41	ECO-P3 Indigenous vegetation removal in Natural Open Space Zone and residential zones	Support	Fire and Emergency supports ECO-P3 insofar as it seeks to reduce the risk of wildfire through the removal of highly flammable indigenous vegetation near existing residential units in natural open spaces and residential zones.	Retain as notified.
42	ECO-R2 Indigenous vegetation removal Residential Zones Natural Open Space Zone	Support in part	Fire and Emergency supports ECO-R2 insofar as it permits the removal of indigenous vegetation in natural open space and residential zones where it is required in accordance with sections 43 or 64 of the Fire and Emergency New Zealand Act 2017. It is noted, however, that the rule does not provide for the removal of indigenous vegetation as a permitted activity for owner/occupiers for the purposes of preventative mitigation of fire risk to property. A further matter of discretion is therefore sought to ensure that fire risk mitigation is considered when assessing applications to trim or remove indigenous vegetation in areas subject to high fire risk.	<p>Amend as follows: ECO-R2 Indigenous vegetation removal 4. <i>Restricted Discretionary</i> Where: a. <i>Compliance is not achieved with ECO-R2.2 or ECO-R2.3.</i> Matters of discretion are restricted to: 3. <i>Positive effects which can only be achieved through non-compliance with ECO-R2.2 or ECO-R2.3, including:</i> b. <i>Improved health and safety, including the degree to which the trimming or removal of affected indigenous vegetation will provide for the health and safety of people, property and the environment, through the management of fire risk.</i></p>
NATC – Natural Character				
43	NATC-P3 Indigenous vegetation removal within coastal margins and riparian margins	Support	Fire and Emergency supports NATC-P3 insofar as it provides for the removal of indigenous vegetation within coastal and riparian margins where it is required for the reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units or rural property.	Retain as notified.
44	NATC-R3 Indigenous vegetation removal within	Support	Fire and Emergency supports NATC-R3 insofar as it permits the removal of indigenous vegetation within coastal and riparian margins where it is required in accordance with sections 43 or 64 of the Fire	Retain as notified.

ID	Proposed provision	Position	Submission	Requested relief
	coastal margins and riparian margins		and Emergency New Zealand Act 2017. Fire and Emergency also supports the relevant matter of discretion relating to consideration of Policy NATC-P3, as supported separately.	
NFL – Natural Features and Landscapes				
45	NFL-P4 Indigenous vegetation removal in Outstanding Natural Features and Landscapes	Support	Fire and Emergency supports NFL-P4 insofar as it seeks to reduce the risk of wildfire through the removal of highly flammable vegetation near existing residential units in outstanding natural features and landscapes.	Retain as notified.
46	NFL-R3 Indigenous vegetation removal in Outstanding Natural Features and Landscapes	Support	Fire and Emergency supports NFL-R3 insofar as it permits the removal of indigenous vegetation in outstanding natural features and landscapes where it is required in accordance with sections 43 or 64 of the Fire and Emergency New Zealand Act 2017. Fire and Emergency also supports the relevant matter of discretion relating to consideration of Policy NFL-P4, as supported separately.	Retain as notified.
SUB – Subdivision				
47	SUB-O3 Servicing of allotments	Support	Fire and Emergency supports SUB-O3 insofar as it provides for adequate servicing by infrastructure and the transport network for development enabled by subdivision.	Retain as notified.
48	SUB-P6 Transport Network	Support	Fire and Emergency supports SUB-P6 insofar as it provides for subdivision where the safe and efficient functioning of the transport network is maintained.	Retain as notified.
49	SUB-P7 Servicing and Access	Support	Fire and Emergency strongly supports SUB-P7 insofar as it promotes all allotments created by subdivision being serviced by a reticulated water supply system in accordance with the Wellington Water Regional Standard for Water Services December 2021. Where reticulated services are not available, allotments should be of a sufficient size and shape to accommodate onsite water supply infrastructure, including for firefighting purposes.	Retain as notified.
50	SUB-R1 Boundary adjustments SUB-R3 Subdivision that does not result in the creation of any new vacant allotments... SUB-R4 Subdivision that creates any vacant allotments	Support	Fire and Emergency strongly supports the requirement for subdivision activities to be managed as controlled activities where there is a requirement to comply with a range of subdivision standards.	Retain as notified.
51	SUB-S1 Allotment Size	Support	Fire and Emergency supports SUB-S1 insofar as the minimum allotment size for sites in the Rural Lifestyle zone is 1ha, which should provide a sufficient size to accommodate onsite water supply infrastructure, thereby giving effect to SUB-P7.	Retain as notified.
52	SUB-S2 Legal and physical access	Support	Subject to the amendments sought under the Transport Chapter, Fire and Emergency strongly supports SUB-S2 insofar as it requires every allotment to have practical, physical and legal access to a formed legal road and for that access to be in accordance with the rules and standards of the Transport Chapter.	Retain as notified.
53	SUB-S3 Roads	Support	Subject to the relief sought under the Transport and Infrastructure chapters, Fire and Emergency supports SUB-S3 which requires all new roads and intersections to comply with the rules and standards set out in the Transport and Infrastructure chapters. Fire and Emergency also supports the inclusion of a matter of discretion relating to public health and urban including the safe functioning of the transport network, subject to the relief sought under INF-P7.	Retain as notified.
54	SUB-S4 Water Supply	Support	Fire and Emergency strongly supports SUB-S4 insofar as, where a reticulated water supply system is available, all new allotments must be provided with a connection which meets the requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. Where a connection to a reticulated water supply system is not available, all allotments must comply with the water supply requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. Furthermore, SUB-S4 includes a matter of discretion relating to the suitability of the proposed water supply for firefighting purposes, including effects on people's health and safety and on property.	Retain as notified.
CE – Coastal Environment				
55	CE-P5 Indigenous Vegetation Removal in the Coastal Environment	Support	Fire and Emergency supports CE-P5 insofar as it seeks to reduce the risk of wildfire through the removal of highly flammable vegetation near existing residential units on rural property. As well as the safe operation of roads, tracks and accessways.	Retain as notified.

ID	Proposed provision	Position	Submission	Requested relief
56	CE-P8 Risk-Based Approach	Support	Fire and Emergency supports CE-P8 insofar as it promotes a risk-based approach to the management of subdivision, use and development taking into consideration the operational and/or functional need for some activities (such as fire stations) to locate in Coastal Hazard Overlays. Fire and Emergency has existing stations located within Coastal Hazard Overlays and may have an operational and/or functional need to locate new stations in areas subject to Coastal Hazard Overlays.	Retain as notified.
57	CE-P9 Levels of Risk	Support	Similar to the previous submission point for CE-P8, Fire and Emergency supports CE-P9 insofar as it recognises that buildings and activities may have an operational and/or functional need to locate in the Coastal Hazard Overlays.	Retain as notified.
58	CE-P15 Subdivision, Use and Development within the Coastal Hazard Overlays	Support	Fire and Emergency supports CE-P15 insofar as it considers the operational and/or functional need for some activities (such as fire stations) to be located in the Coastal Hazard Overlays. Fire and Emergency has existing stations located within Coastal Hazard Overlays and may have an operational and/or functional need to locate new stations in areas subject to Coastal Hazard Overlays.	Retain as notified.
59	CE-R3 Indigenous vegetation removal in the Coastal Environment CE-S1 Indigenous vegetation removal within High and Very High Coastal Natural Character Areas	Support	Fire and Emergency supports both CE-R3 and CE-S1 insofar as the rule and standard permits the removal of indigenous vegetation within Coastal Natural Character Areas where it is required in accordance with sections 43 or 64 of the Fire and Emergency New Zealand Act 2017. Fire and Emergency also supports the relevant matter of discretion relating to consideration of Policy CE-P5, as supported separately.	Retain as notified.
60	CE-R9 Additions to existing buildings and structures for activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Low Tsunami Hazard Overlay CE-R10 Additions to existing buildings and structures for activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays	Support	Fire and Emergency supports the provisions under Rules CE-R9 and CE-R10 which allow for additions to existing emergency services facilities buildings, as either permitted or restricted discretionary activities in the Low and Medium Coastal Hazard overlays.	Retain as notified.
61	CE-R12 Additions to existing buildings and structures for activities most sensitive to natural hazards in the High Coastal Hazard Overlays	Support	Rule CE-F12 provides for additions to existing buildings for activities most sensitive to natural hazards, which includes emergency services facilities, as a discretionary activity in the High Coastal Hazard Overlays. Fire and Emergency has existing fire stations in the High Coastal Hazard Overlays and this rule would provide for any potential future additions, subject to resource consent.	Retain as notified.
NOISE – Noise				
62	NOISE – Noise chapter Note on application of noise rules	Support in part	<p>Fire and Emergency supports that the rules of the NOISE chapter do not apply to:</p> <ul style="list-style-type: none"> Any warning device or siren used by emergency services for civil defence or emergency purposes, including testing and routine maintenance conducted between 7:00am and 7:00pm. The use of generators and mobile equipment (including vehicles) when used solely for civil defence or emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are operated by emergency services or lifeline utilities. <p>Fire and Emergency however seeks that these exemptions be extended to include activities at emergency service facilities associated with emergency response, re-commissioning and emergency response training.</p>	<p>Amend as follows: Note on application of noise rules <i>The rules in this chapter do not apply to the following sources of noise:</i></p> <p>f. Any warning device or siren used by emergency services for civil defence or emergency purposes, and including testing and routine maintenance conducted between 7:00am and 7:00pm,</p> <p>g. The use of generators and mobile equipment (including vehicles) when used solely for civil defence or emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are</p>

ID	Proposed provision	Position	Submission	Requested relief
				operated by emergency services or lifeline utilities, or for the continuation of radiocommunication broadcasts, <i>xx. Activities at emergency services facilities associated with emergency response, commissioning and emergency response training.</i>
63	NOISE-O2 Reverse sensitivity	Support	Fire and Emergency supports NOISE-O2 insofar as the objective seeks to ensure that existing noise generating activities, are not unreasonably constrained in their operations by reverse sensitivity from inappropriately located or designed activities sensitive to noise.	Retain as notified.
64	NOISE-R3	Support	Fire and Emergency supports NOISE-R3, subject to the relief sought under the 'Note on application of noise rules', to ensure that noise emissions from temporary emergency response training exercises, that are not ancillary to a permanent activity on the same site, are exempt from this rule and associated standards.	Retain as notified.
PK – Papakāinga				
65	PK-P3 Providing for papakāinga PK – Papakāinga chapter	Support	Fire and Emergency supports PK-P3 insofar as it ensures papakāinga development is sufficiently supported by existing or planned three waters infrastructure or that an alternative method to service the development is proposed to respond to any infrastructure constraints. Fire and Emergency also supports that the Papakāinga chapter maintains the implementation of rules from the relevant Zone chapters of the Plan.	Retain as notified.
TEMP – Temporary Activities				
66	TEMP-P1 Recognise benefits of temporary activities	Support	Fire and Emergency supports TEMP-P1 insofar as the Policy recognises that temporary activities have a wide range of benefits for the wellbeing of people and communities. Temporary activities undertaken by Fire and Emergency include firefighter emergency response training which is undertaken both on-site at existing fire stations and off-site, such as live fire training.	Retain as notified.
67	TEMP-S1 Duration TEMP-S2 Recurrence TEMP-S3 Hours TEMP-S4 Transport TEMP-S5 Site Restoration TEMP-S6 Buildings	Support in part	Fire and Emergency supports the performance standards in relation to temporary activities insofar as they set out reasonable parameters to provide for off-site emergency response training for firefighters. However standard TEMP-S1 stipulates an insufficient duration to provide for emergency response training, such as live fire training (i.e., burning and putting out fires). Firefighter training is an essential activity undertaken by Fire and Emergency and the PDP should enable this. Accordingly, an amended provision is proposed under TEMP-S1 to allow for the maximum duration of such activities.	Amend as follows: TEMP-S1 Duration All zones 1. The duration of.... 2. The duration of.... 3. <i>For the purposes of emergency response training, the duration is limited to a period of two days, excluding set-up or pack-down activities, which can occur up to seven days prior to commencement and up to seven days following completion of the temporary emergency services training activity.</i>
PART 3 – AREA-SPECIFIC MATTERS				
NEW PROVISIONS FOR ZONES LISTED				
68	New activity: XXX-RX Emergency service facility	New	Fire and Emergency requires the ability to construct and operate emergency service facilities (i.e., fire stations) in locations which will enable reasonable response times to fire and other emergencies. This means new fire stations may be necessary in any zone across the district in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change. This is even more critical given the broader mandated functions of Fire and Emergency under the FENZ Act 2017, which has resulted in an increasing need to respond to a wide range of non-fire emergencies including motor vehicle accidents, medical call-outs and technical rescues (all of which have differing targets in terms of response times). It is also 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. Fire and Emergency notes that the effects of a fire station can be largely anticipated and, in the most part, do not differ to the effects of many activities that may be anticipated through rural and urban environments. Fire and Emergency requests that emergency service facilities are provided for as permitted activities in the larger, more extensive zones of the district to recognise the critical importance of emergency services to communities. Providing for emergency service facilities as a permitted activity would mean that emergency service facilities would be controlled by the subsequent performance standards of each zone (such as height, height in relation to boundary, front yards, building coverage requirements) and	Amend the following zone chapters: <ul style="list-style-type: none"> • LLRZ – Large Lot Residential Zone • MRZ – Medium Density Residential Zone • HRZ – High Density Residential Zone • GRUZ – General Rural Zone • RLZ – Rural Lifestyle Zone • RPROZ – Rural Production Zone • CCZ – City Centre Zone • MCZ – Metropolitan Centre Zone • LCZ – Local Centre Zone • NCZ – Neighbourhood Centre Zone • MUZ – Mixed Use Zone • NOSZ – Natural Open Space Zone • OSZ – Open Space Zone • SARZ – Sport and Active Recreation Zone To include new permitted activity as follows: <div> <div>XXX-RX</div> <div>Emergency service facilities</div> </div> 1. Activity status: Permitted Or To similar effect. And

ID	Proposed provision	Position	Submission	Requested relief
			the other relevant performance standards in other chapters (i.e. transport) so that any effects are appropriately managed. It is noted that the development of new emergency service facilities is already provided for as a permitted activity in the Industrial Zones, which is supported.	any other consequential amendments required to give effect to this new standard.
69	New performance standard: Firefighting water supply	New	<p>Fire and Emergency's main area of concern is the provision of a water supply and access to this supply which will enable Fire and Emergency to operate effectively and efficiently to save lives and property in the event of a fire. This is best achieved through compliance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ 4509:2008.</p> <p>SNZ 4509:2008 sets out minimum water supply requirements required for firefighting water supply to both reticulated and non-reticulated areas. Where a development is unable to connect to the reticulated network, or the reticulated network has insufficient capacity and/or pressure, an alternative firefighting water source is required by Fire and Emergency. This could be from a dedicated firefighting water supply tank.</p> <p>Fire and Emergency notes that the subdivision chapter includes rules and standards applying to subdivision. Therefore, activities that do not require subdivision will not be subject to the servicing standards within, including SUB-S4 that applies to the subdivision of new lots only and requires a firefighting water supply.</p> <p>A new standard is therefore requested in all zones of which development of new buildings are enabled to ensure that new development is provided with a water supply suitable for firefighting purposes. In relation to new standard XXX-SX(1), it is expected that all reticulated water supply networks (whether private or public) will be fully compliant with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 as required by the Code of Practice for Land Development and Subdivision Infrastructure and that new connections under the water supply bylaw will not be granted where there is insufficient capacity available within the water supply network for the proposed activity.</p>	<p>Amend the following zone chapters:</p> <ul style="list-style-type: none"> • LLRZ – Large Lot Residential Zone • MRZ – Medium Density Residential Zone • HRZ – High Density Residential Zone • GRUZ – General Rural Zone • RLZ – Rural Lifestyle Zone • RPROZ – Rural Production Zone • CCZ – City Centre Zone • MCZ – Metropolitan Centre Zone • LCZ – Local Centre Zone • NCZ – Neighbourhood Centre Zone • MUZ – Mixed Use Zone • LIZ – Light Industrial Zone • GIZ – General Industrial Zone • HIZ – Heavy Industrial Zone • NOSZ – Natural Open Space Zone • OSZ – Open Space Zone • SARZ – Sport and Active Recreation Zone <p>To include a new performance standard as follows: <u>XXX-SX(1): Firefighting water supply - All Zones</u></p> <p>1. <u>Activity status: Permitted</u></p> <p>a) <u>Where a connection to a publicly owned reticulated water supply systems is available, all new allotments must:</u></p> <ol style="list-style-type: none"> <u>Be provided with a water supply connection at the allotment boundary, that meets the requirements of the Wellington Water Regional Standard for Water Services December 2021 (Chapter 6, Tables 6.1 and 6.2), and</u> <u>Comply with water supply requirements in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> <p>b) <u>Where a connection to a publicly owned reticulated water supply systems is not available, all allotments must:</u></p> <ol style="list-style-type: none"> <u>Be provided with access to a self-sufficient potable water supply with a minimum volume of 10,000L, and</u> <u>Comply with the water supply requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u> <p><u>Matters of discretion:</u></p> <ol style="list-style-type: none"> <u>The extent to which the proposed water supply is sufficient for the development or activity it serves.</u> <u>The suitability of the proposed water supply for fire-fighting purposes, including effects on people's health and safety, and on property.</u> <u>Where a publicly owned reticulated system is not immediately available, but is likely to be in the near future, the appropriateness of temporary systems.</u> <u>Whether any site constraints make compliance impracticable.</u> <u>Any resulting changes to the level of service provided to other properties in that part of the network.</u> <p>Or To similar effect. And</p>

ID	Proposed provision	Position	Submission	Requested relief				
				any other consequential amendments required to give effect to this new standard.				
70	New performance standard exemption: Building Height – Emergency service towers and communication poles	New	<p>An exemption to the Building Height, Height to Boundary and Setback standards is sought in all zones to provide for the erection of an emergency service tower or communication pole of up to 15m in height specifically on property occupied by an existing or future emergency services facility.</p> <p>Fire and Emergency towers are typically either lattice towers that can support a siren, aerials and hose drying (especially percolating hose which cannot be stored wet) or are platform towers that can support all the above plus be used for firefighter training. Similarly, poles can support sirens, aerials and hose drying activities.</p> <p>An exemption better provides for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations. This would importantly remove the need to comply with height and height in relation to boundary performance standards for towers and poles in all zones. Such an exemption is sought on the basis that fire stations are a key component of Fire and Emergency’s ability to respond to emergencies (and ‘communication towers’ are classified as IL4 under the NZBC building regulations which indicates their importance in emergency events). Further, the exemption will apply in relatively few situations only, the effects of the exemption can be largely anticipated, and such effects do not differ from the effects of several activities that may be anticipated through the urban and rural environments such as TV aerials on houses, small satellite dishes, and chimneys which are often excluded from definitions such as structures.</p>	<p>Amend the following zone chapters:</p> <ul style="list-style-type: none">• LLRZ – Large Lot Residential Zone• MRZ – Medium Density Residential Zone• HRZ – High Density Residential Zone• GRUZ – General Rural Zone• RLZ – Rural Lifestyle Zone• RPROZ – Rural Production Zone• CCZ – City Centre Zone• MCZ – Metropolitan Centre Zone• LCZ – Local Centre Zone• NCZ – Neighbourhood Centre Zone• MUZ – Mixed Use Zone• LIZ – Light Industrial Zone• GIZ – General Industrial Zone• HIZ – Heavy Industrial Zone• NOSZ – Natural Open Space Zone• OSZ – Open Space Zone• SARZ – Sport and Active Recreation Zone <p>To include a new performance standard exemption as follows: Exemption from the Building height (XXXZ-SX), Height in relation to boundary (XXXZ-SX) and Setbacks (XXXZ-SX) standards: The erection or installation of an emergency service tower or communication pole, up to a height of no more than 15m, associated with an emergency services facility.</p>				
LLRZ – Large Lot Residential Zone								
71	LLRZ-O2 Activities in the Large Lot Residential Zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports LLRZ-O2 insofar as it provides for non-residential activities that support the health and wellbeing of people and communities.	Retain as notified.				
72	LLRZ-O3 Planned character and planned urban built environment of the Large Lot Residential Zone	Support	<p>Fire and Emergency supports LLRZ-O3 insofar as it promotes built development which is integrated with existing and planned infrastructure. As defined in the RMA, infrastructure includes a water supply distribution system which Fire and Emergency supports the promotion of as a critical part of providing firefighting water supply.</p> <p>For Fire and Emergency, it is important that adequate infrastructure is in place before enabling the development / intensification of residential areas, particularly those that are intended to be serviced with a reticulated water supply network</p>	Retain as drafted.				
73	LLRZ-P2 Non-residential activities	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency supports LLRZ-P2 as it enables non-residential activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.				
74	LLRZ-P5 Higher density residential development	Support	Fire and Emergency supports LLRZ-P5 insofar as it only seeks to provide for higher density residential development where the site is sufficiently supported by existing or planned three waters infrastructure, or an adequate alternative method.	Retain as notified.				
75	LLRZ-R14 Emergency service facilities	Support in part	<p>Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies.</p> <p>Fire and Emergency requests that emergency service facilities are provided for as permitted activities in this zone to recognise the critical importance of emergency services to communities.</p>	<p>Amend as follows:</p> <table><tr><td>LLRZ-RX</td><td>Emergency service facilities</td></tr><tr><td colspan="2">1. Activity status: Permitted</td></tr></table>	LLRZ-RX	Emergency service facilities	1. Activity status: Permitted	
LLRZ-RX	Emergency service facilities							
1. Activity status: Permitted								
76	LLRZ-S2 Building coverage LLRZ-S3 Building height	Support	Subject to the relief sought under Submission Point ID#68, Fire and Emergency supports the referenced built development standards in the LLRZ-S2 insofar as they provide reasonable parameters for the construction of a new fire station, if required.	Retain as notified.				
77	LLRZ-S5 Setbacks	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with LLRZ-S5 on emergency service access. It is important that	<p>Add a new matter of discretion to LLRZ-S5 as follows: x. The ability for emergency services to safely and efficiently access the site.</p>				

ID	Proposed provision	Position	Submission	Requested relief				
			emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by residents.					
MRZ – Medium Density Residential Zone								
78	MRZ-O2 Activities in the Medium Density Residential Zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports MRZ-O2 insofar as it provides for non-residential activities that support the health and wellbeing of people and communities.	Retain as notified.				
79	MRZ-O4 Planned urban environment of the Medium Density Residential Zone	Support	Fire and Emergency supports MRZ-O4 insofar as it promotes built development which is integrated with existing and planned infrastructure. As defined in the RMA, infrastructure includes a water supply distribution system which Fire and Emergency supports the promotion of as a critical part of providing firefighting water supply. For Fire and Emergency, it is important that adequate infrastructure is in place before enabling the development / intensification of residential areas, particularly those that are intended to be serviced with a reticulated water supply network.	Retain as notified.				
80	MRZ-P2 Non-residential activities MRZ-P3 Other activities	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency supports MRZ-P2 and P3 as they provide for non-residential activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.				
81	MRZ-P13 Urban design outcomes for non-residential activities and developments of more than 3 residential units	Support in part	From an emergency response perspective, a significant concern relating to medium density residential developments is the creation of long, narrow sections and associated pedestrian accessways as the sole access to most units and where backyards are only accessed through the units themselves. The length of these accessways can cause delays in accessing rear units and require extra personnel to lay out hose lengths around corners and support with the extra weight of hoses. This in turn would impact water pressure available at the delivery to the fire site. The narrowness of side boundaries and subsequent accessways can also cause conflict between emergency personnel reaching an emergency, residents attempting to evacuate, and other emergency personnel needs (e.g., St John transporting patients). This scale of response would prove very difficult to accommodate along 1m wide side boundaries. In terms of resident safety, this can mean impeded or delayed evacuation. In many cases if a fire or emergency (such as hazardous substance) were to occur in a middle unit, this would trap all units further to the rear from being evacuated without removing fences and infrastructure to get individuals out through neighbouring sites. Depending on individual site maintenance arrangements, it is possible that communal areas like pedestrian accessways have locked gates or are neglected and planting and other barriers or outdoor furniture further obstruct the usable width of the side boundary or accessway. Fire and Emergency therefore considers that a key urban design outcome for medium density developments should be enabling emergency services to safely and efficiently access all units within the site.	Amend as follows: MRZ-P13 Urban design outcomes for non-residential activities and developments of more than 3 residential units <i>Built development for non-residential activities, or for more than 3 residential units per site, is managed to achieve the following outcomes.</i> 1. Create a safe and legible residential environment by: <u>x. enabling emergency services personnel and equipment to safely and efficiently access all units within the site.</u>				
82	MRZ-R15 Emergency service facilities	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency requests that emergency service facilities are provided for as permitted activities in this zone to recognise the critical importance of emergency services to communities.	Amend as follows: <table><tr><td>MRZ-R15</td><td>Emergency service facilities</td></tr><tr><td colspan="2">1. Activity status: Permitted</td></tr></table>	MRZ-R15	Emergency service facilities	1. Activity status: Permitted	
MRZ-R15	Emergency service facilities							
1. Activity status: Permitted								
83	MRZ-S1 Number of residential units	Support	Subject to the new performance standard sought across all zones under Submission Point ID#69, Fire and Emergency supports MRZ-S1 insofar that it does not permit developments of more than three residential units without the consideration of the capacity of network infrastructure, including the reticulated water network.	Retain as notified.				
84	MRZ-S2 Building coverage MRZ-S3 Building height	Support	Subject to the performance standard exemption sought above, Fire and Emergency supports MRZ-S2 and MRZ-S3 insofar that as they provide reasonable parameters for the construction of a new fire station, if required.	Retain as notified.				
85	MRZ-S5 Setbacks	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with MRZ-S5 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by residents.	Add a new matter of discretion to MRZ-S5 as follows: <u>x. The ability for emergency services to safely and efficiently access the site.</u>				
HRZ – High Density Residential Zone								

ID	Proposed provision	Position	Submission	Requested relief				
86	HRZ-O2 Activities in the High Density Residential Zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports HRZ-O2 insofar as it provides for non-residential activities that support the health and wellbeing of people and communities.	Retain as notified.				
87	HRZ-O4 Planned character and planned urban built environment of the High Density Residential Zone	Support	Fire and Emergency supports HRZ-O4 insofar as it promotes built development which is integrated with existing and planned infrastructure. As defined in the RMA, infrastructure includes a water supply distribution system, which Fire and Emergency supports the promotion of as a critical part of providing firefighting water supply. For Fire and Emergency, it is important that adequate infrastructure is in place before enabling the development / intensification of residential areas, particularly those that are intended to be serviced with a reticulated water supply network.	Retain as notified.				
88	HRZ-P2 Non-residential activities HRZ-P3 Other activities	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency supports HRZ-P2 as it enables non-residential activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.				
89	HRZ-P13 Urban design outcomes for non-residential activities and developments of more than 3 units	Support in part	From an emergency response perspective, a significant concern relating to high density residential developments is the creation of long, narrow sections and associated pedestrian accessways as the sole access to most units and where backyards are only accessed through the units themselves. The length of these accessways can cause delays in accessing rear units and require extra personnel to lay out hose lengths around corners and support with the extra weight of hoses. Excessive hose lengths also result in reduced water pressure. The narrowness of side boundaries and subsequent accessways can also cause conflict between emergency personnel reaching an emergency, residents attempting to evacuate, and other emergency personnel needs (e.g., St John transporting patients). This scale of response would prove very difficult to accommodate along 1m wide side boundaries. In terms of resident safety, this can mean impeded or delayed evacuation. In many cases, if a fire or emergency (such as hazardous substance) were to occur in a middle unit, this would trap all units further to the rear from being evacuated without removing fences and infrastructure to get individuals out through neighbouring sites. Depending on individual site maintenance arrangements, it is possible that communal areas like pedestrian accessways have locked gates or are neglected and planting and other barriers or outdoor furniture further obstruct the usable width of the side boundary or accessway. Fire and Emergency therefore considers that a key urban design outcome for high density developments should be enabling emergency services to safely and efficiently access all units within the site.	Amend as follows: <i>Built development for non-residential activities, or for more than 3 residential units per site, is managed to achieve the following outcomes.</i> 1. Create a safe and legible residential environment by: <u>x. enabling emergency services to safely and efficiently access all units within the site.</u>				
90	HRZ-R16 Emergency service facilities	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency requests that emergency service facilities are provided for as permitted activities in this zone to recognise the critical importance of emergency services to communities.	Amend as follows: <table><tr><td>HRZ-R16</td><td>Emergency service facilities</td></tr><tr><td colspan="2">1. Activity status: Permitted</td></tr></table>	HRZ-R16	Emergency service facilities	1. Activity status: Permitted	
HRZ-R16	Emergency service facilities							
1. Activity status: Permitted								
91	HRZ-S1 Number of residential units	Support	Fire and Emergency supports HRZ-S1 insofar that it does not permit developments of more than 3 residential units without the consideration of adequate reticulated water supply capacity.	Retain as notified.				
92	HRZ-S2 Building coverage HRZ-S3 Building height	Support	Fire and Emergency supports HRZ-S2 and S3 insofar as they provide reasonable parameters for the construction of a fire station, if required.	Retain as notified.				
93	HRZ-S5 Setbacks	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with HRZ-S5 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by residents.	Add a new matter of discretion to HRZ-S5 as follows: <u>x. The ability for emergency services to safely and efficiently access the site.</u>				
GRUZ – General Rural Zone								
94	GRUZ-O2 Activities in the zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports GRUZ-O2 insofar as it provides for other activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.				

ID	Proposed provision	Position	Submission	Requested relief
95	GRUZ-O5 Infrastructure GRUZ-P5 Infrastructure	Support in part	Fire and Emergency supports GRUZ-O5 and GRUZ-P5 insofar as the objective and policy promotes development which is adequately serviced and supported by infrastructure or by on-site facilities. As defined in the RMA, infrastructure includes a water supply distribution system which Fire and Emergency supports the promotion of as a critical part of providing firefighting water supply. For Fire and Emergency, it is important that adequate infrastructure is in place before enabling the development / intensification of rural areas, particularly those that are intended to be serviced with a reticulated water supply network. It is also critical that objectives, policies and rules enable the construction and siting of on-site facilities where connections to reticulated services are unavailable. This may need to include above-ground tanks for the purposes of on-site water storage providing both potable and firefighting water in large volumes. Furthermore, Fire and Emergency supports GRUZ-P5 insofar as it recognises that rural infrastructure can only sustain a low level of land use and intensification without significant investment and improvement.	Amend as follows: GRUZ-O5 Infrastructure <i>Development in the General Rural Zone is either adequately serviced and supported by infrastructure or is serviced and supported by on-site facilities, such as on-site wastewater disposal and water <u>storage or</u> collection.</i> GRUZ-P5 Infrastructure <i>Recognise that infrastructure in rural areas, including in the General Rural Zone, may only be able to support a low level of land use and intensification without significant investment and upgrades, and new development may need to be serviced through on-site facilities such as on-site wastewater disposal and water <u>storage or</u> collection.</i>
96	GRUZ-P2 Compatible activities GRUZ-P3 Potentially incompatible activities	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency supports GRUZ-P2 and GRUZ-P3 as the objective and policy enables activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.
97	GRUZ-R22 Emergency facilities	Oppose	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency requests that emergency service facilities are provided for as permitted activities in this zone, as opposed to a discretionary activity, to recognise the critical importance of emergency services to communities.	Amend as follows: GRUZ-R22 Emergency service facilities 1. Activity status: Permitted
98	GRUZ-S1 Gross floor area GRUZ-S2 Building height	Support	Fire and Emergency supports these built development standards insofar as they provide reasonable parameters for the construction of a fire station, if required. The standards would also provide for the installation of on-site above-ground water tanks, to serve a range of activities, for the purposes of supplying water for potable and firefighting purposes in the rural zone.	Retain as notified.
99	GRUZ-S3 Setbacks	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with GRUZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by residents. Development in the rural zone may also involve the siting of on-site facilities such as water storage tanks. In the event that these structures are unable to comply with the setback standard, the additional matter of discretion will allow Council to consider the benefits of such facilities in the context of an emergency response.	Add a new matter of discretion to GRUZ-S3 as follows: x. <u>The ability for emergency services to safely and efficiently access the site and/or access on-site servicing infrastructure, such as water storage for firefighting purposes.</u>
RLZ – Rural Lifestyle Zone				
100	RLZ-O2 Activities in the zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports RLZ-O2 insofar as it provides for other activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.
101	RLZ-O5 Infrastructure RLZ-P5 Infrastructure	Support	Fire and Emergency supports RLZ-O5 and RLZ-P5 insofar as the objective and policy promotes development which is adequately serviced and supported by infrastructure or is serviced and supported by on-site facilities. As defined in the RMA, infrastructure includes a water supply distribution system which Fire and Emergency supports the promotion of as a critical part of providing firefighting water supply. For Fire and Emergency, it is important that adequate infrastructure is in place before enabling the development / intensification of rural areas, particularly those that are intended to be serviced with a reticulated water supply network. It is also critical that objectives, policies and rules enable the construction and siting of on-site facilities where connections to reticulated services are unavailable. This may need to include above-ground tanks for the purposes of on-site water storage providing both potable and firefighting water in large volumes. Furthermore, Fire and Emergency supports RLZ-P5 insofar as it recognises that rural infrastructure can only sustain a low level of land use and intensification without significant investment and improvement.	Amend as follows: RLZ-O5 Infrastructure <i>Development in the Rural Lifestyle Zone is either adequately serviced and supported by infrastructure or is serviced and supported by on-site facilities, such as on-site wastewater disposal and water <u>storage or</u> collection.</i> RLZ-P5 Infrastructure <i>Recognise that infrastructure in rural areas, including in the Rural Lifestyle Zone, may only be able to support a low level of land use and intensification without significant investment and upgrades, and new development may need to be serviced through on-site facilities such as on-site wastewater disposal and water <u>storage or</u> collection.</i>

ID	Proposed provision	Position	Submission	Requested relief
102	RLZ-P2 Compatible activities RLZ-P3 Potentially incompatible activities	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency supports RLZ-P2 and RLZ-P3 as the objective and policy enables activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.
103	RLZ-R16 Emergency service facilities	Oppose	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency requests that emergency service facilities are provided for as permitted activities in this zone, as opposed to a discretionary activity, to recognise the critical importance of emergency services to communities.	Amend as follows: RLZ-R16 Emergency service facilities 1. Activity status: Permitted
104	RLZ-S1 Gross floor area RLZ-S2 Building height	Support	Fire and Emergency supports these built development standards insofar as they provide reasonable parameters for the construction of a fire station, if required. The standards would also provide for the installation of on-site above-ground water tanks, to serve a range of activities, for the purposes of supplying water for potable and firefighting purposes in the rural zone.	Retain as notified.
105	RLZ-S3 Setbacks	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with RLZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by residents. Development in the rural zone may also involve the siting of on-site facilities such as water storage tanks. Where these structures are unable to comply with the setback standard, the additional matter of discretion will allow HCC to consider the benefits of such facilities in the context of an emergency response.	Add a new matter of discretion to RLZ-S3 as follows: <u>x. The ability for emergency services to safely and efficiently access the site and/or access on-site servicing infrastructure, such as water for firefighting purposes.</u>
CCZ – City Centre Zone				
106	CCZ-O2 Activities in the zone	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency seeks an amendment to CCZ-O2 that enables activities that have an operational and/or functional need to locate within the zone. It is considered that this will support the health, safety and well-being of communities.	Amend as follows: CCZ-O2 Activities in the zone The City Centre Zone: ... c. Provides for other activities that: <u>x. Either support the health and wellbeing of people and communities in the surrounding area and/or have an operational and/or functional need to locate in the zone.</u>
107	CCZ-P3 Potentially incompatible activities	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency seeks an amendment to CCZ-P3 that enables potentially incompatible activities that have an operational and/or functional need to locate within the zone and support the local community. It is considered that this will support the health, safety and well-being of communities.	Amend as follows: CCZ-P3 Potentially Incompatible activities 1. Provide for other, potentially incompatible activities if they: <u>x. Either support the community within the zone and surrounding area and/or have an operational and/or functional need to locate in the zone.</u> ...
108	CCZ-S3 Setbacks – Adjoining zones	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with CCZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by people.	Add a new matter of discretion to CCZ-S3 as follows: <u>x. The ability for emergency services to safely and efficiently access the site.</u>
MCZ – Metropolitan Centre Zone				
109	MCZ-O2 Activities in the zone	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency seeks an amendment to MCZ-O2 that enables potentially incompatible activities that have an operational and/or functional need to locate within the zone. It is considered that this will support the health, safety and well-being of communities.	Amend as follows: MCZ-O2 Activities in the zone The City Centre Zone: ... c. Provides for other activities that:

ID	Proposed provision	Position	Submission	Requested relief
				<u>x. Either support the health and wellbeing of people and communities in the surrounding area and/or have an operational and/or functional need to locate in the zone.</u>
110	MCZ-P3 Potentially incompatible activities	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency seeks an amendment to MCZ-P3 that enables potentially incompatible activities that have an operational and/or functional need to locate within the zone. It is considered that this will support the health, safety and well-being of communities.	Amend as follows: MCZ-P3 Potentially Incompatible activities 1. Provide for other, potentially incompatible activities if they: <u>x. Either support the community within the zone and surrounding area and/or have an operational and/or functional need to locate in the zone.</u> ...
111	MCZ-S4 Setbacks – Adjoining zones	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with MCZ-S4 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by people.	Add a new matter of discretion to MCZ-S3 as follows: <u>x. The ability for emergency services to safely and efficiently access the site.</u>
LCZ – Local Centre Zone				
112	LCZ-O2 Activities in the zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports LCZ-O2 insofar as it provides for other activities that support the health and wellbeing of people and communities.	Retain as notified.
113	LCZ-P3 Potentially incompatible activities	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency seeks an amendment to LCZ-P3 that enables potentially incompatible activities that have an operational and/or functional need to locate within the zone. It is considered that this will support the health, safety and well-being of communities.	Amend as follows: LCZ-P3 Potentially compatible activities 1. Provide for other, potentially incompatible activities if they: <u>x. Either support the community within the zone and surrounding area and/or have an operational and/or functional need to locate in the zone.</u> ...
114	LCZ-S3 Setbacks – Adjoining zones	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with LCZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by people.	Add a new matter of discretion to LCZ-S3 as follows: <u>x. The ability for emergency services to safely and efficient access the site.</u>
NCZ – Neighbourhood Centre Zone				
115	NCZ-O2 Activities in the zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports NCZ-O2 insofar as it provides for other activities that support the health and wellbeing of people and communities.	Retain as notified.
116	NCZ-P3 Potentially incompatible activities	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency seeks an amendment to NCZ-P3 that enables potentially incompatible activities that have an operational and/or functional need to locate within the zone. It is considered that this will support the health, safety and well-being of communities.	Amend as follows: NCZ-P3 Potentially Incompatible activities 1. Provide for other, potentially incompatible activities if they: <u>y. Either support the community within the zone and surrounding area and/or have an operational and/or functional need to locate in the zone.</u> ...
117	NCZ-S3 Setbacks – Adjoining zones	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with NCZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by people.	Add a new matter of discretion to NCZ-S3 as follows: <u>x. The ability for emergency services to safely and efficiently access the site.</u>
MUZ – Mixed Use Zone				
118	MUZ-O2 Activities in the zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports MUZ-O2 insofar as it provides for other activities that support the health and wellbeing of people and communities.	Retain as notified.
119	MUZ-P2 Potentially incompatible activities	Support in part	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency seeks an amendment to MUZ-P3 that enables potentially incompatible activities that have an operational and/or	Amend as follows: MUZ-P2 Potentially Incompatible activities 1. Provide for other, potentially incompatible activities if they:

ID	Proposed provision	Position	Submission	Requested relief				
			functional need to locate within the zone. It is considered that this will support the health, safety and well-being of communities.	<u>x. Either support the community within the zone and surrounding area or have an operational and/or functional need to locate in the zone.</u> ...				
120	MUZ-R19 Emergency service facilities	Oppose	<p>Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies.</p> <p>Fire and Emergency requests that emergency service facilities are provided for as permitted activities in this zone, as opposed to a discretionary activity, to recognise the critical importance of emergency services to communities.</p> <p>Notwithstanding the relief sought under MUZ-R19, in the event that an emergency services land use activity is retained as a restricted discretionary activity, the matters of discretion under MUZ-R19 require such buildings to be assessed against the urban design outcomes listed under Policy MUZ-P8. These design outcomes require larger new non-residential developments to “display aesthetic value” or establish “positive new or evolved architectural themes and traditions” and as such, do not provide for the functional needs of a fire station in terms of overall building design and site layout. It is therefore requested that, as a minimum, the requirement to comply MUZ-P8 is removed.</p>	<p>Amend as follows:</p> <table><tr><td>MUZ-R19</td><td>Emergency service facilities</td></tr><tr><td colspan="2">1. Activity status: Permitted</td></tr></table>	MUZ-R19	Emergency service facilities	1. Activity status: Permitted	
MUZ-R19	Emergency service facilities							
1. Activity status: Permitted								
121	MUZ-S3 Setbacks – Adjoining zones	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with MUZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by people.	<p>Add a new matter of discretion to MUZ-S3 as follows:</p> <p><u>x. The ability for emergency services to safely and efficiently access the site.</u></p>				
LIZ – Light Industrial Zone								
122	LIZ-O2 Activities in the zone	Support in part	Fire and Emergency strongly supports the provision of emergency service facility activities within the Light Industrial Zone. However, Fire and Emergency notes that the PDP defines these facilities as ‘Emergency Service Facilities’ and, as such, seeks an amendment to LIZ-O2 to provide consistency and clarity throughout the plan.	<p>Amend as follows:</p> <p>LIZ-O2 Activities in the zone</p> <p>The Light Industrial Zone:</p> <p>...</p> <p>2. Provides for emergency <u>service</u> facilities and trade and industrial training activities,</p> <p>...</p>				
123	LIZ-P1 Enabled activities	Support in part	Fire and Emergency strongly supports the enabling of emergency service facilities within the Light Industrial Zone. However, Fire and Emergency notes that the PDP defines these facilities as ‘Emergency Service Facilities’ and, as such, seeks an amendment to LIZ-P1 to provide consistency and clarity throughout the plan.	<p>Amend as follows:</p> <p>LIZ-P1 Enabled activities</p> <p>Enable industrial activities, research activities, emergency <u>service</u> facilities, and trade and industrial training activities.</p>				
124	LIZ-R7 Emergency facilities	Support in part	Fire and Emergency strongly supports a permitted activity status for emergency service facilities within the Light Industrial zone. However, Fire and Emergency notes that the PDP defines these facilities as ‘Emergency Service Facilities’ and, as such, seeks an amendment to LIZ-R7 to provide consistency and clarity throughout the plan.	<p>Amend as follows:</p> <p>LIZ-R7 Emergency <u>service</u> facilities</p>				
125	LIZ-S3 Setbacks – Adjoining zones	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with LIZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by people.	<p>Add a new matter of discretion to LIZ-S3 as follows:</p> <p><u>x. The ability for emergency services to safely and efficient access the site.</u></p>				
GIZ – General Industrial Zone								
126	GIZ-O2 Activities in the zone	Support in part	Fire and Emergency strongly supports the provision of emergency service facility activities within the Light Industrial Zone. However, Fire and Emergency notes that the PDP defines these facilities as ‘Emergency Service Facilities’ and, as such, seeks an amendment to GIZ-O2 to provide consistency and clarity throughout the plan.	<p>Amend as follows:</p> <p>GIZ-O2 Activities in the zone</p> <p>The General Industrial Zone:</p> <p>...</p> <p>1. Provides for emergency <u>service</u> facilities and trade and industrial training activities,</p> <p>...</p>				
127	GIZ-P1 Enabled activities	Support in part	Fire and Emergency strongly supports the enabling of emergency service facilities within the Light Industrial Zone. However, Fire and Emergency notes that the PDP defines these facilities as ‘Emergency Service Facilities’ and, as such, seeks an amendment to GIZ-P1 to provide consistency and clarity throughout the plan.	<p>Amend as follows:</p> <p>GIZ-P1 Enabled activities</p> <p>Enable industrial activities, research activities, emergency <u>service</u> facilities, and trade and industrial training activities.</p>				

ID	Proposed provision	Position	Submission	Requested relief
128	GIZ-R7 Emergency facilities	Support in part	Fire and Emergency strongly supports a permitted activity status for emergency service facilities within the General Industrial zone. However, Fire and Emergency notes that the PDP defines these facilities as 'Emergency Service Facilities' and, as such, seeks an amendment to GIZ-R7 to provide consistency and clarity throughout the plan.	Amend as follows: GIZ-R7 Emergency <u>service</u> facilities
129	GIZ-S3 Setbacks – Adjoining zones	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with GIZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by people.	Add a new matter of discretion to GIZ-S3 as follows: <u>x. The ability for emergency services to safely and efficiently access the site.</u>
HIZ – Heavy Industrial Zone				
130	HIZ-O2 Activities in the zone	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. Fire and Emergency supports HIZ-O2 insofar as it provides for other activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.
131	HIZ-P3 Other incompatible or potentially incompatible activities	Support	Fire and Emergency requires the ability to construct and operate fire stations in locations which enable reasonable response times to fire and other emergencies. As such, Fire and Emergency supports HIZ-P3 as the enables activities that have an operational and/or functional need to locate within the zone and serve the community.	Retain as notified.
132	HIZ-R7 Emergency facilities	Support in part	Fire and Emergency strongly supports a permitted activity status for emergency service facilities within the Heavy Industrial zone. However, Fire and Emergency notes that the PDP defines these facilities as 'Emergency Service Facilities' and, as such, seeks an amendment to HIZ-R7 to provide consistency and clarity throughout the plan.	Amend as follows: HIZ-R7 Emergency <u>service</u> facilities
133	HIZ-S3 Setbacks – Adjoining zones	Support in part	Fire and Emergency seeks the inclusion of a new matter of discretion to provide HCC the ability to consider the risk of non-compliance with HIZ-S3 on emergency service access. It is important that emergency service access suitable for Fire and Emergency personnel is provided at site boundaries, as well as provision for emergency egress by people.	Add a new matter of discretion to HIZ-S3 as follows: <u>x. The ability for emergency services to safely and efficiently access the site.</u>