

Waitomo District Council
Queen Street
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21 June 2024

Attention: Independent Hearing Commissioners

Dear Hearing Commissioners

Written statement on behalf of Fire and Emergency New Zealand - Tranche 1: The hearing of the Proposed Waitomo District Plan

Fire and Emergency New Zealand (Fire and Emergency) made a submission on the Proposed Waitomo District Plan (PDP). Fire and Emergency has opted not to attend Tranche 1 hearing, scheduled to commence Tuesday, 16 July 2024, and requests that, in lieu of attendance, this written statement be tabled for the Hearing Commissioners' consideration.

The section 42A reports for the first tranche of hearings have been received. Overall, there is a good level of agreement with the reporting officer's recommendations in relation to Fire and Emergency's submission across the various chapters. The sections below therefore focus on those matters that are not yet agreed or require further consideration by the Hearing Commissioners before a decision is made.

The focus of this written statement is to seek consistency in Councils approach to Fire and Emergency's property and operational requirements that will support Fire and Emergency in meeting their principal objective to reduce the incidence of unwanted fire and the associated risk to life and property and in relation to the main functions of Fire and Emergency under section 11 and the additional functions under section 12 of the Fire and Emergency New Zealand Act 2017,—

- (i) to protect and preserve life; and
- (ii) to prevent or limit injury; and
- (iii) to prevent or limit damage to property and land; and
- (iv) to prevent or limit damage to the environment.

Natural hazards

New policies

Summary of submission point: Fire and Emergency sought new policies specific to wildfire. Two policies were put forward for consideration (or to similar effect) as follows:

NH-P14 In areas assessed or identified as being potentially subject to elevated fire risk, ensure that an appropriate design and layout, including a buffer area or setback is provided for new subdivision and development, and the following matters are considered:

- (a) *Access for emergency service vehicles.*
- (b) *Provision of and access to emergency firefighting water supply.*

(c) Separation and management of vegetation (with regard to slope, aspect, management regimes and use of less flammable vegetation), and

(d) The design and materials of any buildings.

NH-P15 Manage wildfire risk by making provision for water supplies and access to buildings for firefighting and appropriate buffers are maintained between new building platforms and forest and bush areas.

Section 42A recommendation: Mr Bell considers that the matters in the two policies put forward by Fire and Emergency relating to access for emergency service vehicles and firefighting water supply are appropriately managed in the PDP by provisions in the subdivision chapter, in each zone and in the transport chapter (for example SUB-R20, RLZ-R27, TRAN-R18). The design and materials for buildings is managed under the Building Act 2004.

Mr Bell considers that this leaves the matter of buffer setbacks/separation and management of vegetation (regarding slope, aspect, management regimes and use of less flammable vegetation). Mr Bell is not clear how Council would identify an area as being 'subject to elevated fire risk' and whether Council would have the legislative scope through a district plan to identify these areas. Mr Bell indicates that there is no objection in principle to considering a policy provision on this matter provided the proper scope is available and states that a broader policy could be possible to at least elevate the matter in the minds of developers. An example put forward by Mr Bell is:

NH-PX When locating building platforms on a site, manage wildfire risk by considering:

1. New vegetation with regard to slope, aspect, management regimes and planting less flammable vegetation and;
2. The maintenance of appropriate buffers between new building platforms and existing forest and bush areas.

Mr Bell has welcomed feedback on this matter from Fire and Emergency, however in the interim has recommended that the submission point is rejected.

Fire and Emergency's response: The definition of natural hazard includes 'fire' which the PDP adopts based on the RMA definition. The district plan is the primary regulatory land use tool to manage natural hazard risk through policies, rules and resource consents for subdivision, development and infrastructure. These mechanisms are not provided for under alternative legislation. It is understood that this aspect, i.e., the role and function of the PDP in relation to the management of fire as a natural hazard is not disputed by Mr Bell however, more the identification of fire risk and subsequent implementation of management measures of such has been questioned.

Fire and Emergency note that fire as a natural hazard is unique, in that fire risk changes based on several factors (topography, climate, fuels, wind, structures etc.). The changing nature of fire risk over time means that fire risk cannot be reasonably mapped (such as flooding can be modelled and mapped) and therefore identifying areas subject to elevated fire risk as part of the resource consent process can be a challenge. There are however non-statutory tools prepared by Fire and Emergency that can assist developers in implementing measures to reduce fire risk –

- [Wildfire Safer Housing Guide | Fire and Emergency New Zealand](#)
- [Get Fire Safe at the Interface: Protect your home from wildfires | Fire and Emergency New Zealand](#)
- [Flammability of Plant Species | Fire and Emergency New Zealand](#)

Fire and Emergency are currently working on developing guidelines for subdivision that look to manage fire risk at subdivision. This is in progress and Fire and Emergency endeavor to work in partnership with Councils to develop good practice policy approaches so Council and Fire and Emergency can adequately fulfil their roles in this space.

The intent of the new policies proposed in Fire and Emergency's submission was to sit behind the existing provisions of the PDP that manage fire risk (such as those pointed out by Mr Bell relating to the provision of

firefighting water supply and adequate emergency access) to develop a more robust policy framework around fire risk management.

Fire and Emergency's position remains that fire is a matter of sufficient significance to be included in provisions in the natural hazards chapter and are therefore supportive of the adoption of alternative policy wording. An alternative that incorporates the example of Mr Bell and would also meet the requested relief sought by Fire and Emergency is set out below for the Commissioners consideration:

NH-PX To ensure that subdivision, use and development:

- 1. Has regard to the risk of wildfire, including consideration of:*
 - (a) Topographical features within the site and surrounding area.*
 - (b) The maintenance of appropriate buffers between new building platforms and existing forest and bush areas, and*
 - (b) New vegetation with regard to slope, aspect, management regimes and planting less flammable vegetation.*
- 2. Incorporates measures to avoid or reduce the risk of wildfire where appropriate.*

Fire and Emergency consider that the above new suggested policy would result in a more robust policy framework for fire risk management, for developers to turn their minds to such considerations and for Councils' processing planners to take into account such measures as part of the resource consent process.

General Rural Zone

GRUZ-R46. Maximum building coverage

Summary of submission point: Fire and Emergency sought amendment to this rule in acknowledgement that the maximum building coverage rule could hinder the construction and operation of new emergency service facilities due to the land purchase / development requirements of Fire and Emergency.

Section 42A recommendation: Ms O'Callaghan suggests that the amendment sought by Fire and Emergency is not needed as the percentages are designed to be proportional to the size of the lot and this is an acceptable, well-understood approach to site management. However, Ms O'Callaghan agrees that emergency service facilities could be exempt from this rule.

Fire and Emergency's response: This exemption and recommendation is supported by Fire and Emergency.

GRUZ-R47. Servicing

Summary of submission point: Fire and Emergency supported GRUZ-R47 to the extent that it requires the provision of a firefighting water supply. However, the prescribed requirements within this rule set out the water supply classification 2 (FW2) which is the minimum requirements for sprinklered structures and non-sprinklered housing, which includes single family dwellings and multi-unit dwellings as per the SNZ PAS 4509:2008. This would not be sufficient for all other structures provided for in the GRUZ such as 'visitor accommodation and residential based visitor accommodation' and 'tourism facilities and retail activities' which may require a higher water supply classification.

The following alternative wording was sought to address this matter:

- 4. Where a connection to the Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.*

Section 42A recommendation: Ms O'Callaghan states that it appears that while GRUZ-R47.4 is appropriate for residential activities, amended wording 'All developments must have an independent water supply for firefighting that is compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies

Code of Practice' is appropriate for the firefighting water supply requirements of other types of accommodation in the GRUZ. Ms O'Callaghan considers that the exact amendment required, and the specific activities this applies to, needs to be confirmed with Fire and Emergency. In the interim no amendment is made and clarification from Fire and Emergency has been welcomed.

Fire and Emergency's response: The exact amendment required is set out in Fire and Emergency's submission (and specified above).

SNZ PAS 4509:2008 should be applied to all new structures (i.e. buildings) within the GRUZ or where a change of building use occurs, the existing water supply should be evaluated against the requirements of the changed use and if there is a difference in requirements that this be addressed through this performance standard.

SNZ PAS 4509:2008 sets out what constitutes a sufficient minimum supply of water pressure and volume for firefighting in structures and provides techniques to define a sufficient firefighting water supply that may vary according to circumstances. SNZ PAS 4509:2008 is written in a way that will encourage flexibility and provide different options for developers and Councils.

Rural Lifestyle Zone

RLZ - Table 1 – Activities Rules

Summary of submission point: Fire and Emergency sought that emergency service facilities be provided for as a permitted activity, and subject to compliance with the performance standards in RLZ - Table 2. Where there is a non-compliance with the performance standards, a restricted discretionary activity was requested subject to the matters of discretion associated with the infringed standard.

Section 42A recommendation: Ms Wratt notes that with the structure of the PDP, the establishment of a fire station or any other form of emergency service facility would be a non-complying activity in the RLZ by virtue of RLZ-R15 which makes activities not otherwise listed, a non-complying activity. Ms Wratt considers this to be overly stringent, particularly as enabling emergency service facilities benefits the community and reduces the response time to emergencies. Given that emergency service facilities are not the primary purpose of the RLZ and are not anticipated, Ms Wratt has recommended that a restricted discretionary activity status would be more appropriate, enabling the built form and layout to be considered, as well as any effects including maintaining the character of the RLZ. Ms Wratt has suggested that the matters of discretion could include bulk and location, amenity and visual matters. The reporting officer has recommended 'accepting in part' the submission, introducing a new rule to be inserted as follows:

RLZ-XX.	Emergency service facilities ²
<p>Activity status: RDIS</p> <p>The performance standards in RLZ - Table 2 do not apply.</p>	<p>Matters over which discretion is restricted are:</p> <ul style="list-style-type: none"> (a) Visual effects including bulk, scale and location of the building; and (b) Noise generation; and (c) Effects on the safety and efficiency of the transport network; and (d) Effects on surrounding properties, rural lifestyle character and amenity.

Fire and Emergency's response: While Ms Wratt's recommendation does not adopt the relief sought by Fire and Emergency, it is acknowledged that emergency service facilities are not anticipated in the Rural Lifestyle Zone. In this instance, a restricted discretionary activity status would be accepted by Fire and Emergency on the basis that the performance standards set out in Table 2 do not apply.

RLZ-R18. Minimum setback from road boundaries

Summary of submission point: Fire and Emergency requested that emergency service facilities are excluded from the minimum setback from road boundaries rule in the Rural Lifestyle Zone. This supports the

logistical and operational requirements of Fire and Emergency which include the need for fire appliances to be strategically located adjacent to the transport corridor for prompt emergency response. Also, greater setbacks increase civil costs, land parcel size and can create fire separation issues at the rear boundary. Ideally, Fire and Emergency would construct buildings no further than 8-10m from the road frontage in order facilitate fire appliance stopping so they are not on the roading network.

Section 42A recommendation: Ms Wratt has rejected the relief sought based on the recommendation above that provides for emergency service facilities in the RLZ as a restricted discretionary activity. Ms Wyatt considers it is more important to consider the proposal for an emergency service facility comprehensively rather than requiring compliance with bulk and location standards. Ms Wyatt has therefore recommended adding in an exemption from the standards for emergency service facilities and accepting the submission point.

Fire and Emergency's response: This is supported on the basis that the recommendation by Ms Wyatt in relation to RLZ Table 1 is accepted.

RLZ-R26. Maximum building coverage

Summary of submission point: Fire and Emergency requested that smaller sites in RLZ are provided with a maximum building size (GFA) in recognition of smaller sites and associated activities that may need to be located in the RLZ to support the community in future.

Section 42A recommendation: Ms Wratt has rejected the relief sought based on the recommendation that emergency service facilities be exempt from the standards in favour of considering a resource consent for such a facility holistically as a restricted discretionary activity.

Fire and Emergency's response: This is supported on the basis that the recommendation by Ms Wyatt in relation to RLZ Table 1 is accepted.

Settlement Zone

SETZ-R40. Maximum building coverage

Summary of submission point: Fire and Emergency requested that smaller sites in SETZ are provided with a maximum building size (GFA) in recognition of smaller sites and associated activities that may need to be located in the SETZ to support the community in future. The submission seeks to amend SETZ-R40 to include an alternative standard identifying a m² area to the rule.

Section 42A recommendation: Ms Wratt appreciates Fire and Emergency's concerns particularly in the instance where a station is already established. However, Ms Wyatt is cognizant that the suggested amendments would apply to all properties within the zone. This approach would not be consistent with the objectives and policies that protect the amenity values and character of the zone. Nevertheless, Ms Wyatt considers that emergency services are an important service to the community and sympathetic to the operational requirements of emergency service facilities and consider that they should be enabled in SETZ to reduce the response time when there is an emergency. Ms Wyatt has therefore recommended that SETZ-R40 remain as drafted, but cascade to a controlled activity instead of discretionary where emergency service facilities exceed the specified site coverage standard. This will provide the opportunity for Council to consider the effects of the increased site coverage through a resource consent process. The amended rule would look as follows:

SETZ-R40 Maximum building coverage

1. The maximum total building coverage on a site must not exceed 35% of the net site area.

Activity status where compliance is not achieved: DIS

Activity status where compliance is not achieved for emergency service facilities: CON
Council's control is reserved over the following matters:
(a) The layout, design and location of buildings on the site; and
(b) Effects on the streetscape and amenity of the area; and
(c) Management of stormwater.

Fire and Emergency's response: This recommended amendment is supported by Fire and Emergency, whereby the ability to comply with the permitted activity threshold is still available, however, if compliance cannot be achieved, then a controlled activity consent would need to be sought. This is considered a reasonable resource management approach in the Settlement Zone and the matters of control are considered sensible on the basis of which consent must be granted.

Commercial Zone

COMZ-O2.

Summary of submission point: Fire and Emergency requested that COMZ-O2 be amended to better reflect the rule framework which provides for emergency service facilities as a permitted activity.

Section 42A recommendation: Ms Wyatt notes that COMZ-O2 is an unusual objective in that it acts more as a policy by identifying appropriate activities in the COMZ. By COMZ-O2 performing the role of a policy rather than an objective, it has resulted in a gap in the policy framework. It is Ms Wyatt's preference to redraft COMZ-O2 to make it more about activities that support the community and convert COMZ-O2 to a policy which includes the amendments sought by Fire and Emergency, however there is no express scope to do so.

Although this alternative was not sought by any submissions, Ms Wyatt would support any opportunity to improve clarity of the PDP, should the Panel consider there is scope to do so.

Fire and Emergency's response: Should the Panel consider there is scope to make the changes recommended by Ms Wyatt, Fire and Emergency would be supportive of the new drafted policy by Ms Wyatt. If there is deemed to be insufficient scope, Fire and Emergency request that the original amendment sought in its submission to COMZ-O2 be accepted.

Industrial Zone

INZ-O2.

Summary of submission point: Fire and Emergency request that INZ-O2 be amended to better reflect the rule framework which provides for emergency service facilities as a permitted activity.

Section 42A recommendation: Ms Wratt has recommended that INZ-O2 be deleted and replaced with the following, while acknowledging that this may not entirely satisfy Fire and Emergency's request, but it will result in clearer direction for the INZ:

INZ-O2. Ensure that non-industrial activities are directed to other zones to protect both the industrial and residential land supply, and the viability of the district's commercial zones.

Industrial activities are protected from incompatible land uses and reverse sensitivity effects.

Fire and Emergency's response: While it is acknowledged that the purpose and intent of the INZ needs to protect industrial activities from incompatible and reverse sensitivity effects, the recommended amendment does not address the relief sought and leaves it open for interpretation in terms of what may be deemed compatible, such as a fire station. Fire and Emergency therefore seek that the policy framework better reflect the rule framework. An alternative approach to consider would be to introduce a new policy (similar to notified INZ-P2) as follows:

INZ-P10 Provide for emergency service facilities, where there is a direct operational need or functional need to locate within the Industrial Zone.

New standard

Summary of submission point: Fire and Emergency note that there is no servicing standard for the Industrial Zone that requires industrial activities to provide a firefighting water supply.

While Fire and Emergency recognise that most industrial activities within Waitomo district will occur within the urban environment where a connection to Council's reticulated network is available, Fire and Emergency

note that the Council cannot always guarantee a connection, nor that the reticulated network will have sufficient capacity and pressure to service these developments in accordance with the SNZ PAS 4509:2008 (i.e. provide a level of service greater than FW2). Where additional firefighting water is required, private storage should be designed to comply with the requirements of SNZ PAS 4509:2008.

It is considered that this approach will help the Waitomo community in securing the provision of firefighting water for new buildings where reticulated supplies may be inadequate. This will provide for the health and safety of people and communities in the Waitomo district. A new standard was sought as follows:

IND-R30 - Servicing

1. All sites/developments must be connected to the Council's reticulated water supply system.
2. Where a connection with Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.

Note: Further advice and information about managing fire risk and storage of water for firefighting purposes can be obtained from Fire and Emergency New Zealand and SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice (refer Table 1 and 2).

Section 42A recommendation: Ms Wratt has indicated that Council's water services have advised that it can meet the standard, and they are currently undertaking testing for firefighting purposes. Those results will be available ahead of the hearings. Ms Wratt considers that the new standard would not impose additional demands on landowners if the reticulated system is sufficient. Ms Wratt therefore recommends accepting the standard requested by fire and Emergency as this will ensure not only that each site / development is serviced for water, but also that the water supply is sufficient for firefighting.

Fire and Emergency's response: This recommendation is supported by Fire and Emergency.

Natural Open Space Zone

NOSZ-P2.

Summary of submission point: Fire and Emergency requested that NOSZ-P2 is amended to ensure that any new buildings in the NOSZ are provided with a firefighting water supply to ensure fire risk is managed. The following amendment has been sought:

NOSZ-P2. Enable use and development that protects the natural open space character, values and amenity of the zone where the use and development:

[...]

7. Require new buildings and structures to provide a firefighting water supply to manage fire risk.

Section 42A recommendation: Mr Draca has rejected the above relief with no clear reason.

Fire and Emergency's response: Fire and Emergency request the commissioners to re-consider the above relief in parallel to the new performance standard sought below.

New standard

Summary of submission point: Fire and Emergency consider that new buildings located in the NOSZ should be required to provide a firefighting water supply to manage fire risk. The relief sought is as follows:

NOSZ-R13 - Servicing

1. Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply

and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.

Note: Further advice and information about managing fire risk and storage of water for firefighting purposes can be obtained from Fire and Emergency New Zealand and SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice (refer Table 1 and 2).

Section 42A recommendation: This relief has been rejected by Mr Draca. Mr Draca considers that NOSZ-P2.7 (assumed Mr Draca means NOSZ-P1.7) specifically requires that there is adequate existing or planned infrastructure to service the activity and or development. He considers that the wording 'adequate existing or planned infrastructure' would also include infrastructure for firefighting purposes and as such, the suggested additional standard by FENZ is not considered necessary.

Fire and Emergency's response: The reasoning behind this recommendation is unclear and is inconsistent with the approach taken across other zones, both in the operative district plan but also the PDP and the recommendations across other s42A reports. Further, a policy is unable to give effect to the relief sought by Fire and Emergency.

Fire and Emergency request that the commissioners re-consider the relief sought and the value of requiring a firefighting water supply being provided in the NOSZ where new buildings are enabled.

Open Space Zone

New standard

Summary of submission point: Fire and Emergency sought a new performance standard that requires new buildings located in the OSZ to be required to provide a firefighting water supply to manage fire risk. The relief sought is as follows:

OSZ-R16 - Servicing

1. Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.

Note: Further advice and information about managing fire risk and storage of water for firefighting purposes can be obtained from Fire and Emergency New Zealand and SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice (refer Table 1 and 2).

Section 42A recommendation: This relief has been rejected by Mr Draca. Mr Draca considers that 'OSZ-P2.8' specifically requires that there is adequate existing or planned infrastructure to service the activity and or development. He considers that the wording 'existing and planned infrastructure' would also include infrastructure for firefighting purposes, and as such, the suggested additional standard is not required to give effect to the relief sought.

Fire and Emergency's response: The reasoning behind this recommendation is unclear and is inconsistent with the approach taken across other zones, both in the operative district plan but also the PDP and the recommendations across other s42A reports. Further, a policy is unable to give effect to the relief sought by Fire and Emergency.

Fire and Emergency request that the commissioners re-consider the relief sought and the value of requiring a firefighting water supply being provided in the OSZ where new buildings are enabled.

Māori Purpose Zone

MPZ-R26. Servicing

Summary of submission point: Fire and Emergency supports the intent of MPZ-R26(4) to the extent that it requires the provision of FW2 minimum requirements as per the SNZ PAS 4509:2008 in the Maori Purpose Zone. However, Fire and Emergency would highlight that taking this approach of prescribing how firefighting water supply must be provided does remove the flexibility inherent within SNZ PAS 4509:2008 which provides for alternative methods of servicing, such as a communal firefighting water supply which may be beneficial for marae complex and papakāinga. While prescribing the means of providing firefighting water supply in the rule could be perceived as providing plan users and applicants with greater clarity, it does have the disadvantage of removing the ability to provide firefighting water supply using alternative means such as a communal firefighting water supply which Fire and Emergency does not support. Fire and Emergency therefore sought the replacement of MPZ-R26(4) with the following:

4. Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.

Section 42A recommendation: The reporting officer notes that MPZ-R26(4) sets out several complex firefighting requirements for development that is not supplied by Council or a private community supply. The reporting officer notes that there is an advice note below the standard to this effect therefore considers that the relief sought by Fire and Emergency seems a more streamlined approach and has therefore recommended this relief be adopted.

Fire and Emergency's response: This is supported by Fire and Emergency.

Tourism Zone

TOUZ-R41. Servicing

Summary of submission point: Fire and Emergency support the intent of TOUZ-R41(4) to the extent that it requires the provision of FW2 minimum requirements as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice in the TOUZ. However, the prescribed requirements set out the water supply classification 2 (FW2) which is the minimum requirements for sprinklered structures and non-sprinklered housing, which includes single family dwellings and multi-unit dwellings as per the SNZ PAS 4509:2008.

FW2 may not be sufficient for all other structures provided for in the TOUZ such as 'tourism facilities', 'retail activities', 'Educational facilities and community facilities, libraries and museums' and 'visitor accommodation' among other permitted activities that may require a higher water supply classification due to their scale and fire hazard category.

Fire and Emergency therefore requested that TOUZ-R41(4) be replaced with the following wording to achieve consistency across the PDP and ensure that each development in TOUZ is correctly calculated to meet the firefighting water supply requirements.

4. Where a connection to Council's reticulated water supply system compliant with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice is not available, or additional level of service is required, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water source provisions of SNZ PAS 4509:2008.

Section 42A recommendation: The reporting officer indicates that Rule TOUZ-R41 relates to the provision of three waters infrastructure to service development and specifies that where reticulated water and wastewater are not available developments must be serviced by onsite infrastructure. Rule TOUZ R41.4 specifically relates to each site being provided with the necessary access to water for firefighting purposes.

The reporting officer states that it appears that while TOUZ-R41 is appropriate for residential activities, amended wording 'All developments must have an independent water supply for firefighting that is compliant with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice' is appropriate for the firefighting water supply requirements of other types of accommodation in the TOUZ. The exact amendment required and the specific activities this applies to needs to be confirmed with Fire and Emergency. In the interim no amendment is made and clarification from Fire and Emergency is welcomed.

Fire and Emergency's response: The relief sought in Fire and Emergency's submission is consistent with the relief sought elsewhere in the PDP and can be applied to all activities in the GRUZ whereby SNZ PAS 4509:2008 will specify the minimum requirements of each development enabled through the GRUZ on a case-by-case basis.

SNZ PAS 4509:2008 should be applied to all new structures (i.e. buildings) within the TOUZ or where a change of building use occurs, the existing water supply should be evaluated against the requirements of the changed use and if there is a difference in requirements that this be addressed through this performance standard.

Fire and Emergency would welcome further collaboration or communication, should there be a need to resolve any outstanding matters in relation to its submission and details set out above.

Yours sincerely



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on behalf of

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