

## **Submission on publicly notified proposal for policy statement or plan, change or variation**

### **Clause 6 of Schedule 1**

### **Resource Management Act 1991**

To: Kāpiti Coast District Council

Submission on: Proposed Plan Change 2

**Name of submitter: Fire and Emergency New Zealand**

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**Fire and Emergency New Zealand (Fire and Emergency) is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (RMA).**

This is a submission on behalf of Fire and Emergency New Zealand (FENZ) to Kāpiti Coast District Council (KCDC) concerning their proposed Plan Change 2 (hereafter, "PC2").

The Fire and Emergency New Zealand Act 2017 (FENZ Act) establishes the governance, management and operational arrangements for protecting life and property from fire and other emergencies in New Zealand. As outlined in section 10 of the FENZ Act, the principal objectives of FENZ are to: reduce the incidence of unwanted fire and the associated risk to life and property, protect and preserve life, and prevent or limit injury, damage to property land, and the environment.

The main functions of FENZ, as identified in section 11 of the FENZ Act, are:

1. to promote fire safety, including providing guidance on the safe use of fire as a land management tool;
2. to provide fire prevention, response, and suppression services;
3. to stabilise or render safe incidents that involve hazardous substances;
4. to provide for the safety of persons and property endangered by incidents involving hazardous substances;
5. to rescue persons who are trapped as a result of transport accidents or other incidents;
6. to provide urban search and rescue services; and
7. to efficiently administer the FENZ Act.

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

8. responding to medical emergencies;
9. responding to maritime incidents;
10. 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;
11. providing assistance at transport accidents (for example, crash scene cordoning and traffic control);
12. responding to severe weather-related events, natural hazard events, and disasters;
13. responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment;
14. promoting safe handling, labelling, signage, and transportation of hazardous substances; and
15. responding to any other situation, if FENZ has the capability to assist.

FENZ also has various other functions under other legislation and regulations, or as determined by the Minister of Internal Affairs from time to time. This feedback seeks amendments to PC2 that will better enable FENZ to carry out its functions under the FENZ Act and to more effectively protect lives, property and the environment. This response 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 Kāpiti District.

**FENZ feedback is that:**

Due to operational and training requirements, FENZ has an interest in the land use provisions of PC2 to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements, particularly in relation to housing development (e.g. to ensure adequate consideration is given to risk reduction and emergency response requirements) and fire station development (e.g. to ensure the development of new fire station facilities are appropriately enabled, in the context of the sustainable management of natural and physical resources).

To meet its statutory responsibilities, FENZ requires:

1. the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies;
2. the ability to undertake training activities for the firefighters within the region; and
3. adequate access and water supply for new developments and subdivisions to ensure that FENZ can effectively and efficiently respond to emergencies.

There are five fire stations within the Kāpiti District, as described below.

Station	Physical address	Zone	Overlays
Ōtaki Volunteer Fire Brigade	96 Mill Road	General Residential Zone	1. PREC <sub>x1</sub> – Residential

			Intensification Precinct A 2. Coastal Environment
Te Horo Volunteer Fire Brigade	58 School Road	Rural Production Zone	N/A
Waikanae Volunteer Fire Brigade	353 Te Moana Road	General Residential Zone	1. Flood Hazard Ponding Area 2. Coastal Environment
Paraparaumu Station	22 Te Roto Drive	General Industrial Zone	1. Coastal Environment
Paekākāriki Volunteer Fire Brigade	31 Tilley Road	General Residential Zone	2. PREC <sub>x1</sub> – Precinct: Residential Intensification Precinct A 3. Coastal Environment

The effects of a fire station can be largely anticipated and, in the most part, do not differ to the effects of a number of activities that may be anticipated in urban or peri-urban environments.

In terms of height requirements, fire stations will generally be single storied buildings of approximately 8 to 9 metres in height. Hose drying towers may also be required in some cases, which can be around 12 to 15 metres in height.

Setback distances from road frontages are also required to accommodate the stopping of appliances outside the appliance bays, but off the road reserve area.

Vehicle movements to and from fire station sites differ depending on whether a fire station accommodates volunteer or career firefighters, on the number of emergencies, and are primarily related to fire appliances movements and firefighter private vehicles.

Noise will also be produced on site by operational activities such as cleaning and maintaining equipment, training activities and noise produced by emergency sirens. Training may take place anywhere between 7:00am and 10:00pm. Cleaning and maintenance will generally take place during the day; however, it can take place after a call out which can occur at any time. Generally, FENZ has assessed that a fire station will be capable of meeting the standards set out in NZS 6802:2008 Acoustics - Environmental noise (Table 3 - Guideline residential upper noise limits), with the exclusion of noise created by emergency sirens.

#### **Adequate water supply and access for firefighting activities:**

The provision of adequate firefighting water supply access to that supply is critical. It is important to FENZ that any new dwelling or land use that does not have access to a reticulated water supply has access to an adequate firefighting water supply of some kind. This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore achieves the purpose of the Resource Management Act 1991 (RMA).

The New Zealand Firefighting Code of Practice SNZ/PAS 4509:2008 (Code of Practice) is a non-mandatory New Zealand Standard which sets out the requirements for firefighting water and access. The Code of Practice enables a consistent approach throughout New Zealand and allows FENZ to respond effectively and efficiently to a fire emergency. The Code of Practice provides techniques to define a sufficient firefighting water supply that may vary according to the circumstances and is based on an assessment of the minimum water supply needed to fight a fire and to limit fire spread. Volumes required vary according to each different building's fire hazards.

The operative District Plan does not make reference to the Code of Practice 4509:2008, however, it contains multiple provisions relating to the operational requirements of firefighters. FENZ acknowledges these provisions in the operative district plan and seeks to provide guidance to PCC as to how best to improve the provisions of the district plan with respect to providing firefighting water supply and access to better enable FENZ to meet its statutory responsibilities.

Adequate access to both the source of a fire and a firefighting water supply is also essential to the efficient operation of FENZ. The requirements for firefighting access are set out in the Code of Practice and further detailed in FENZ's 'Emergency Vehicle Access Guidelines' (May 2015). A fire appliance requires, as a minimum, access which is four metres in width and four metres in height clearance, with a maximum gradient of 1 in 5 (and accompanying transition ramps).

#### **Key feedback themes:**

New fire stations may be necessary in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change. In this regard it is noted that FENZ 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. FENZ therefore considers that provisions within the District Plan are the best way to facilitate the development of any new fire stations within the district as urban development progresses.

Depending on development, a new fire station could conceivably be required in any of the urban zones within the district and FENZ requests that new stations are provided for in all zones permitted, controlled or restricted discretionary activities with permitted standards appropriately recognising emergency services, such as through building height and access provisions which accommodate the requirements of fire stations.

#### **Background:**

In achieving the sustainable management of natural and physical resources under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of the District Plan to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements, particularly in relation to subdivision and new developments.

#### **Summary**

Appendix A sets out detail of FENZ's feedback, including the amendments sought by FENZ to specific provisions of PC2, and the reasons for the amendments.

Fire and Emergency **wish to be heard** in support of its submission however will look to work with the applicant prior on fire risk management measures should there be a desire to do so.



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

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## Appendix A: Fire and Emergency NZ specific feedback

The following table provides FENZ's feedback and sets out the decisions sought by FENZ, including specific amendments to provisions of Kāpiti Coast District Council's Proposed Plan Change 2. These amendments are shown in **red** (for new text sought) and ~~strike through~~ (for deletion).

ID	Provision	Position	Feedback	Decision sought
<b>District Objectives Chapter</b>				
1	<b>DO-O3 Development Management</b>	<b>Support</b>	FENZ supports DO-O3 insofar as it promotes the development of new urban areas where these can be efficiently serviced.	Retain as drafted.
2	<b>DO-Ox1 Well-functioning Urban Environments</b> A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	<b>Support</b>	FENZ supports DO-Ox1 insofar as it promotes well-functioning urban environments that provides for the safety of people and communities.	Retain as drafted.
<b>UFD – Urban Form and Development</b>				
3	<b>UFD-P1 Growth Management</b> New urban development for residential activities will only be located within existing urban areas and identified growth areas, and will be undertaken in a manner which: ... 1. can be sustained within and makes efficient use of existing capacity of public services and infrastructure, or is integrated with the planned capacity of public services and infrastructure; and ...	<b>Support</b>	FENZ supports UFD-P1 insofar as it promotes the urban development to occur in a manner which can be sustained within, and make efficient use of, public services and infrastructure.	Retain as drafted.

4	<b>UFD-P4 Residential Density</b> The density of subdivision and development will be managed through an area-specific approach to achieve an appropriate range of housing types across the District, as set out below: 1. residential densities will be integrated with existing or planned infrastructure capacity	Support	FENZ supports UFD-P4 insofar as it ensures residential densities will be integrated with existing or planned infrastructure.	Retain as drafted.
<b>PK - Papakāinga</b>				
5	<b>PK-Px4 Maximum scale of papakāinga development</b> The maximum intensity and scale of papakāinga development will be determined by the limitations of the site, including: 1. adequate provision of on-site or off-site infrastructure to serve the papakāinga; and ...	Support	FENZ supports PK-Px4 insofar as it limits the maximum intensity and scale of development by the provision of on-site or off-site infrastructure to service papakāinga development.	Retain as drafted.
<b>GRZ – General Residential Zone</b>				
6	<b>New policy</b>	<b>NEW</b>	FENZ seeks the inclusion of a new policy that ensures all land use activities in the General Residential Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to DO-O13 and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide a firefighting water supply.	Add a new policy as follows:  <u><b>GRZ-PX Servicing</b></u> <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u>
7	<b>GRZ-R6 New buildings, and any minor works,</b>	<b>Support with</b>	FENZ supports GRZ-R6 to the	Amend height standards as

<p><b>additions or alterations to any building within the Coastal Qualifying Matter Precinct</b></p> <p>...</p> <p>Permitted activity standards</p> <p>...</p> <p>6. Height</p> <p>The maximum height of any building shall be 8 metres except:</p> <p>...</p> <p>7. Any building or structure must fit within a height in relation to boundary envelope...</p>	<p><b>amendment</b></p>	<p>extent that it provides a maximum height of 8m for any building.</p> <p>Fire stations are typically single storied buildings of approximately 8-9m in height and are usually able to comply with the height standards in district plans generally. This is considered acceptable for fire stations in this zone.</p> <p>Hose drying towers being required at stations is dependent on locational and operational requirements of each station. These structures can be around 12 to 15 metres in height. Whilst referred to as 'hose drying towers', they serve several purposes being for hose drying, communications and training purposes on station.</p> <p>FENZ considers that the inclusion of an exemption for emergency service facilities and hose drying towers from height standards 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.</p>	<p>follows:</p> <p><u><i>Exclude emergency service facilities up to 9m and hose drying towers up to 15m from height and height in relation to boundary standards.</i></u></p> <p>Add a new standard as follows:</p> <p><u><i>GRZ-SX Servicing</i></u></p> <ol style="list-style-type: none"> <li><u><i>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</i></u></li> <li><u><i>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</i></u></li> </ol>
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			<p>Furthermore, FENZ seeks a new standard that ensures all land use activities in this zone are adequately serviced, particularly in relation to firefighting water supply. In order for FENZ to effectively respond to a fire emergency, it is vital for a firefighting water supply, and access to that supply, be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 in both reticulated and non-reticulated areas.</p>	<p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
8	<p><b>GRZ-Rx1 New buildings and structures, and any minor works, additions or alterations to any building or structure</b></p> <p>...</p> <p>Permitted activity standards</p> <p>2. Height</p> <p>Buildings and structures must not exceed 11 metres in height...</p> <p>3. Height in relation to boundary</p> <p>...</p>	<p><b>Support with amendment</b></p>	<p>FENZ supports GRZ-Rx1 to the extent that it provides a maximum height of 11m for any building. Fire stations are typically 8-9m in height, therefore GRZ-Rx1 provides for the requirements of a new fire station.</p> <p>However, hose drying towers can be around 12 to 15 metres in height. FENZ considers that the inclusion of an exemption for hose drying towers from height standards better provides for the health and safety of the community.</p>	<p>Amend height standards as follows:</p> <p><u>Exclude hose drying towers up to 15m from height and height in relation to boundary standards.</u></p> <p>Add a new standard as follows:</p> <p><u>GRZ-SX Servicing</u></p> <p>1. <u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a</u></p>

			<p>Furthermore, FENZ seeks a new standard that ensures all land use activities in this zone are adequately serviced, particularly in relation to firefighting water supply.</p>	<p><u>firefighting water supply, and access to that supply.</u></p> <p>2. <u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
9	<p><b>GRZ-Rx2 New buildings and structures, and any minor works, additions or alterations to any building or structure within a Residential Intensification Precinct.</b></p> <p>...</p> <p>Permitted activity standards</p> <p>2. Height</p>	<p><b>Support with amendment</b></p>	<p>FENZ notes that an existing fire station is located within a Residential Intensification Precinct that may require additions or alterations in the future. As such, FENZ supports GRZ-Rx2 insofar as it permits</p>	<p>Amend height standards as follows:</p> <p><u>Exclude hose drying towers up to 15m from height and height in relation to boundary standards.</u></p>

<p>Buildings and structures must not exceed: 20m in height, where located in Residential Precinct A; 14m in height where located in Residential Intensification Precinct B.</p> <p>...</p>	<p>new buildings and structures, or minor works, additions, and alterations to buildings and structures within Residential Intensification Precincts as a permitted activity.</p> <p>However, FENZ may have an operational/functional need to locate a new fire station in the area. Therefore, as per the previous points, FENZ seeks for a height exemption for hose drying towers within the Residential Intensification Precinct B area.</p> <p>Furthermore, FENZ seeks a new standard that ensures all land use activities in this zone are adequately serviced, particularly in relation to firefighting water supply.</p>	<p>Add a new standard as follows:</p> <p><u>GRZ-SX Servicing</u></p> <ol style="list-style-type: none"> <li><u>1. Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></li> <li><u>2. Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></li> </ol> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA</u></p>
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				<u>PAS 4509:2008.</u>
10	<p><b>GRZ-Rx3 New buildings and structures, and any minor works, additions or alterations to any building or structure within the Marae Takiwā Precinct.</b></p> <p>...</p> <p>Permitted activity standards</p> <p>3. Height</p> <p>Buildings and structures must not exceed 8m in height</p> <p>...</p> <p>4. Height in relation to boundary</p> <p>...</p>	<p><b>Support with amendment</b></p>	<p>As per the previous points discussed, FENZ seeks an exemption for fire stations and hose drying towers from height standards.</p> <p>Furthermore, FENZ seeks a new standard that ensures all land use activities in this zone are adequately serviced, particularly in relation to firefighting water supply.</p>	<p>Amend height standards as follows:</p> <p><u>Exclude emergency service facilities up to 9m and hose drying towers up to 15m from height and height in relation to boundary standards.</u></p> <p>Add a new standard as follows:</p> <p><u>GRZ-SX Servicing</u></p> <ol style="list-style-type: none"> <li><u>1. Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></li> <li><u>2. Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply</u></li> </ol>

				<p><u>and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
11	<p><b>GRZ-Rx5 New buildings and structures, and any minor works, additions or alterations to any building or structure, that do not comply with one or more of the standards under rules GRZ-Rx1 or GRZ-Rx2, except for standard GRZ-Rx1.1.</b></p> <p><b>GRZ-Rx6 New buildings and structures, and any minor works, additions or alterations to any building or structure, that comply with all of the standards under rules GRZ-Rx1 or GRZ-Rx2, except for standard GRZ-Rx1.1.</b></p> <p><b>GRZ-Rx7 New buildings and structures, and any minor works, additions or alterations to any building or structure, that do not comply with one or more of the standards under rules GRZ-Rx1 or GRZ-Rx2, including standard GRZ-Rx1.1.</b></p> <p><b>GRZ-Rx8 New buildings and structures, and any minor works, additions or alterations to any building or structure, within the Marae Takiwā</b></p>	<b>Support with amendment</b>	<p>As per the points raised above, FENZ seeks the inclusion of a matter of discretion that will provide Council with the scope to consider the sufficient provision of a firefighting water supply, and access to that supply, in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice.</p>	<p>Amend as follows:</p> <p><i>Matters of discretion are restricted to:</i></p> <p>...</p> <p><u>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>

	<p><b>Precinct that do not comply with one or more of the standards under rule GRZ-Rx3.</b></p> <p>Matters of Discretion:</p> <p>...</p>			
12	<p><b>New rule</b></p>	<p><b>NEW</b></p>	<p>FENZ notes there are currently no provisions for the establishment of emergency service facilities within the GRZ, and as such the activity could be considered a non-complying activity under current provisions.</p> <p>Therefore, FENZ seeks the addition of a new rule for 'emergency service facilities'. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations.</p> <p>FENZ considers that adding a new rule for Emergency Service Facilities provides for emergency service facilities in this zone as a</p>	<p>Add new rule as follows:</p> <p><b><u>GRZ-RX Emergency Service Facilities</u></b></p> <p><b><u>Activity Status – Permitted</u></b></p>

			permitted activity is vital given PC2 will enable increased density and development. This will better provide for health and safety of the community by enabling the efficient functioning of FENZ in establishing and operating fire stations	
<b>MCZ – Metropolitan Centre Zone</b>				
13	<b>New objective and policy</b>	<b>NEW</b>	FENZ seeks a new objective that promotes the provision of infrastructure within the Metropolitan Centre Zone. Further, FENZ seeks the inclusion of a new policy that ensures all land use activities in the Metropolitan Centre Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to MCZ-OX and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.	<p>Add a new objective and policy as follows:</p> <p><b><u>MCZ-OX Infrastructure</u></b>  <u>Public health and safety is maintained through the appropriate provision of infrastructure.</u></p> <p><b><u>MCZ-PX Servicing</u></b>  <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u></p>
14	<b>MCZ-R7 Except within the Dune Protection Area identified on the Structure Plan in Appendix 19, new buildings and structures and additions and alterations to existing buildings and structures.</b> ...	<b>Support with amendment</b>	FENZ supports MCZ-R7 to the extent that it provides a maximum height of 21m for any building and structure.	<p>Retain height standards as drafted.</p> <p>Add a new standard as follows:</p>

<p>Permitted activity standard:</p> <p>1. Height</p> <p>Buildings and structures must not exceed 21m in height</p> <p>...</p> <p>2. Height in relation to boundary</p> <p>...</p>	<p>Fire stations are typically single storied buildings of approximately 8-9m. Hose drying towers are structures that tend be around 12 to 15 metres in height. Therefore, MCZ-R7 currently provides for the height provisions of fire stations and associated hose drying towers.</p> <p>However, FENZ seeks a new standard that ensures all land use activities in this zone are adequately serviced, particularly in relation to firefighting water supply. In order for FENZ to effectively respond to a fire emergency, it is vital for a firefighting water supply, and access to that supply, be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 in both reticulated and non-reticulated areas.</p>	<p><u>MCZ-SX Servicing</u></p> <ol style="list-style-type: none"> <li><u>1. Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></li> <li><u>2. Where a connection to a reticulated water supply system is unavailable, or where an additionally level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></li> </ol> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
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15	<p><b>MCZ-R11 New buildings and structures and additions and alterations to existing buildings and structures in Precinct A that do not comply with Permitted Activity Standards 7, 8 and 20 in MCZ-R7.</b></p> <p>Controlled activity standards:</p> <p>...</p>	Support with amendment	<p>As per the previous submission point, FENZ seeks a new matter of control that ensures all new buildings and structures and additions and alterations to existing buildings and structures in Precinct A are adequately serviced, particularly in relation to firefighting water supply.</p>	<p>Add a matter of control as follows:</p> <p><u><i>x. Consideration of the provision of services, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</i></u></p>
16	<p><b>MCZ-R13 New buildings and structures and additions and alterations to existing buildings and structures where one or more of the permitted activity standards in MCZ-R7 or one or more of the controlled activity standards in MCZ-R11 are not met.</b></p> <p><b>MCZ-R15 Earthworks, new buildings and structures and additions and alterations to existing buildings and structure in the Dune Protection Area identified in the Structure Plan in Appendix 19.</b></p> <p>...</p> <p>Matters of discretion:</p> <p>...</p>	Support with amendment	<p>As per the points raised above, FENZ seeks the inclusion of a matter of discretion that will provide Council with the scope to consider the sufficient provision of a firefighting water supply, and access to that supply, in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice.</p>	<p>Amend as follows:</p> <p><i>Matters of discretion are restricted to:</i></p> <p>...</p> <p><u><i>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</i></u></p>
17	<p><b>New rule</b></p>	NEW	<p>FENZ notes there are currently no provisions for the establishment of emergency service facilities within the MCZ, and as such the activity could be considered a non-complying activity under current provisions.</p> <p>Therefore, FENZ seeks the</p>	<p>Add new rule as follows:</p> <p><u><b>MCZ-RX Emergency Service Facilities</b></u></p> <p><u><b>Activity Status – Permitted</b></u></p>

			<p>addition of a new rule for 'emergency service facilities'. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations.</p> <p>FENZ considers that adding a new rule for Emergency Service Facilities provides for emergency service facilities in this zone as a permitted activity is vital given PC2 will enable increased density and development. This will better provide for health and safety of the community by enabling the efficient functioning of FENZ in establishing and operating fire stations</p>	
<b>TCZ – Town Centre Zone</b>				
18	<b>New objective and policy</b>	<b>NEW</b>	<p>FENZ seeks a new objective that promotes the provision of infrastructure within the Town Centre Zone. Further, FENZ seeks the inclusion of a new policy that ensures all land use</p>	<p>Add a new objective and policy as follows:</p> <p><u><b>TCZ-OX Infrastructure</b></u>  <u><b>Public health and safety is maintained through the appropriate</b></u></p>

			activities in the Town Centre Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to TCZ-OX and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.	<u>provision of infrastructure.</u>  <b><u>TCZ-PX Servicing</u></b> <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u>
19	<b>TCZ-R6 New buildings and structures and additions and alterations to existing buildings and structures.</b> ... Permitted activity standards 1. Height Buildings and structures must not exceed 12 metres in height, and within the Coastal Qualifying Matter Precinct and the Marae Takiwā Precinct no building shall be more than 3 storeys above the original ground level. 2. Height in relation to boundary ...	<b>Support with amendment</b>	FENZ supports TCZ-R6 to the extent that it provides a maximum height of 11m for any building. Fire stations are typically 8-9m in height, therefore TCZ-R6 provides for the requirements of a new fire station.  However, hose drying towers can be around 12 to 15 metres in height. FENZ considers that the inclusion of an exemption for hose drying towers from height standards better provides for the health and safety of the community.  Furthermore, FENZ seeks a new standard that ensures all land use activities in this zone are adequately serviced, particularly in relation to firefighting water	Amend height standards as follows:  <u>Exclude hose drying towers up to 15m from height and height in relation to boundary standards.</u>  Add a new standard as follows:  <b><u>TCZ-SX Servicing</u></b> 1. <u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> 2. <u>Where a connection to a reticulated water supply system is unavailable, or where an additionally level of service is required that</u>

			<p>supply. In order for FENZ to effectively respond to a fire emergency, it is vital for a firefighting water supply, and access to that supply, be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 in both reticulated and non-reticulated areas.</p>	<p><u>exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
20	<p><b>TCZ-R7 New buildings and structures and additions and alterations to existing buildings and structures and activities in the Raumati Beach Town Centre Zone.</b></p> <p>...</p> <p>Permitted activity standards</p> <p>1. The activity must comply with the permitted activity standards for new buildings and structures and additions and alterations to existing buildings and structures under TCZ-R6.</p> <p>...</p>	<p><b>Support with amendment</b></p>	<p>Subject to the relief sought in the previous submission point, FENZ supports TCZ-R7 insofar as it requires compliance with the permitted activity standards for new buildings and structures and additions and alterations to existing buildings and structures under TCZ-R6.</p>	<p>Retain as drafted.</p>

	<p><b>TCZ-R11 New buildings and structures and additions and alterations to existing buildings and structures where one or more of the permitted activity standards is not met.</b></p> <p>...</p> <p>Matters of discretion:</p> <p>...</p> <p>2. Height</p> <p>Buildings and structures must not exceed 21 metres in height.</p>	<p><b>Support with amendment</b></p>	<p>FENZ supports TCZ-R11 insofar as it permits new buildings, structures and alterations / additions up to 21 metres in height, which provides for the requirements of fire stations and associated hose drying towers.</p> <p>However, as discussed in previous submission points, FENZ seeks the inclusion of a matter of discretion that will provide Council with the scope to consider the sufficient provision of a firefighting water supply, and access to that supply, in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice.</p>	<p>Amend as follows:</p> <p><i>Matters of discretion are restricted to:</i></p> <p>...</p> <p><u><i>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</i></u></p>
21	<p><b>TCZ-R13 Development which is undertaken in accordance with the Development Incentives Guidelines set out in Appendix 1.</b></p> <p>...</p> <p>Matters of discretion:</p> <p>...</p>	<p><b>Support with amendment</b></p>	<p>As discussed in previous submission points, FENZ seeks the inclusion of a matter of discretion that will provide Council with the scope to consider the sufficient provision of a firefighting water supply, and access to that supply, in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice.</p>	<p>Amend as follows:</p> <p><i>Matters of discretion are restricted to:</i></p> <p>...</p> <p><u><i>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</i></u></p>
22	<p><b>TCZ-Rx4 New buildings and structures, and any minor works, additions or alterations to any</b></p>	<p><b>Support with amendment</b></p>	<p>FENZ supports TCZ-Rx4 to the extent that it provides a maximum</p>	<p>Amend height standards as follows:</p>

	<p><b>building or structure, within the Marae Takiwā Precinct that do not comply with one or more of the standards under rule TCZ-R6.</b></p> <p>...</p> <p>Standards:</p> <p>...</p> <p>2. Height</p> <p>Buildings and structures must not exceed 12m in height</p> <p>...</p> <p>Matters of discretion:</p> <p>...</p>		<p>height of 12m for any building and structure.</p> <p>Fire stations are typically 8-9m in height, therefore TCZ-Rx4 provides for the requirements of a new fire station.</p> <p>However, hose drying towers can be around 12 to 15 metres in height. FENZ considers that the inclusion of an exemption for hose drying towers from height standards better provides for the health and safety of the community.</p> <p>Furthermore, FENZ seeks the inclusion of a matter of discretion that will provide Council with the scope to consider the sufficient provision of a firefighting water supply, and access to that supply, in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice.</p>	<p><u>Exclude hose drying towers up to 15m from height and height in relation to boundary standards.</u></p> <p>Add a new matter of discretion as follows:</p> <p><u>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
23	<b>New rule</b>	<b>NEW</b>	<p>FENZ notes there are currently no provisions for the establishment of emergency service facilities within the TCZ, and as such the activity could be considered a non-complying activity under current provisions.</p>	<p>Add new rule as follows:</p> <p><u><b>TCZ-RX Emergency Service Facilities</b></u></p> <p><u>Activity Status – Permitted</u></p>

			<p>Therefore, FENZ seeks the addition of a new rule for 'emergency service facilities'. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. FENZ considers that adding a new rule for Emergency Service Facilities provides for emergency service facilities in this zone as a permitted activity is vital given PC2 will enable increased density and development. This will better provide for health and safety of the community by enabling the efficient functioning of FENZ in establishing and operating fire stations</p>	
<b>LCZ – Local Centre Zone</b>				
24	<b>New objective and policy</b>	<b>NEW</b>	FENZ seeks a new objective that promotes the provision of infrastructure within the Local	Add a new objective and policy as follows:

			<p>Centre Zone. Further, FENZ seeks the inclusion of a new policy that ensures all land use activities in the Local Centre Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to LCZ-OX and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.</p>	<p><b><u>LCZ-OX Infrastructure</u></b>  <u>Public health and safety is maintained through the appropriate provision of infrastructure.</u></p> <p><b><u>LCZ-PX Servicing</u></b>  <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u></p>
25	<p><b>LCZ-R6 New buildings and structures and additions and alterations to existing buildings</b></p> <p>...</p> <p>Permitted activity standards:</p> <p>...</p> <p>1. Height</p> <p>Buildings and structures must not exceed 12 metres in height, and within the Coastal Qualifying Matter Precinct, no building shall be more than 3 storeys above the original ground level.</p> <p>...</p> <p>2. Height in relation to boundary</p> <p>...</p>	<p><b>Support with amendment</b></p>	<p>FENZ supports LCZ-R6 to the extent that it provides a maximum height of 12m for any building and structure.</p> <p>Fire stations are typically 8-9m in height, therefore LCZ-R6 provides for the requirements of a new fire station.</p> <p>However, hose drying towers can be around 12 to 15 metres in height. FENZ considers that the inclusion of an exemption for hose drying towers from height standards better provides for the health and safety of the community.</p>	<p>Amend height standards as follows:</p> <p><u>Exclude hose drying towers up to 15m from height and height in relation to boundary standards.</u></p> <p>Add a new standard as follows:</p> <p><b><u>LCZ-SX Servicing</u></b></p> <ol style="list-style-type: none"> <li><u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></li> <li><u>Where a connection to a</u></li> </ol>



			<p>Furthermore, FENZ seeks a new standard that ensures all land use activities in this zone are adequately serviced, particularly in relation to firefighting water supply. In order for FENZ to effectively respond to a fire emergency, it is vital for a firefighting water supply, and access to that supply, be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 in both reticulated and non-reticulated areas.</p>	<p><u>reticulated water supply system is unavailable, or where an additionally level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
26	<p><b>LCX-R12 New buildings and structures and additions and alterations to existing buildings in the Local Centre Zone where one or more of permitted activity standards is not met:</b></p> <p>...</p> <p>Matters of discretion:</p> <p>...</p>	<p><b>Support with amendment</b></p>	<p>As discussed in previous submission points, FENZ seeks the inclusion of a matter of discretion that will provide Council with the scope to consider the sufficient provision of a firefighting water supply, and access to that supply, in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice.</p>	<p>Amend as follows:</p> <p><i>Matters of discretion are restricted to:</i></p> <p>...</p> <p><u>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand</u></p>

				<u>Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u>
27	New rule	NEW	<p>FENZ notes there are currently no provisions for the establishment of emergency service facilities within the LCZ, and as such the activity could be considered a non-complying activity under current provisions.</p> <p>Therefore, FENZ seeks the addition of a new rule for 'emergency service facilities'. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. FENZ considers that adding a new rule for Emergency Service Facilities provides for emergency service facilities in this zone as a permitted activity is vital given PC2 will enable increased density and development. This will better</p>	<p>Add new rule as follows:</p> <p><u>LCZ-RX Emergency Service Facilities</u> <u>Activity Status – Permitted</u></p>

			provide for health and safety of the community by enabling the efficient functioning of FENZ in establishing and operating fire stations	
<b>MUZ – Mixed Use Zone</b>				
28	<b>New objective and policy</b>	<b>NEW</b>	FENZ seeks a new objective that promotes the provision of infrastructure within the Mixed Use Zone. Further, FENZ seeks the inclusion of a new policy that ensures all land use activities in the Mixed Use Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to MUZ-OX and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.	<p>Add a new objective and policy as follows:</p> <p><u><b>MUZ-OX Infrastructure</b></u>  <u>Public health and safety is maintained through the appropriate provision of infrastructure.</u></p> <p><u><b>MUZ-PX Servicing</b></u>  <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u></p>
29	<b>MUZ-R6 New buildings and structures and additions and alterations to existing buildings and structures,</b> ... Permitted activity standards 1. Height Buildings and structures must not exceed 12m in height ...	<b>Support with amendment</b>	<p>FENZ supports MUZ-R6 to the extent that it provides a maximum height of 12m for any building and structure.</p> <p>Fire stations are typically 8-9m in height, therefore MUZ-R6 provides for the requirements of a new fire station.</p>	<p>Amend height standards as follows:</p> <p><u><b>Exclude hose drying towers up to 15m from height and height in relation to boundary standards.</b></u></p> <p>Add a new standard as follows:</p>

<p>2. Height in relation to boundary ...</p>		<p>However, hose drying towers can be around 12 to 15 metres in height. FENZ considers that the inclusion of an exemption for hose drying towers from height standards better provides for the health and safety of the community.</p> <p>Furthermore, FENZ seeks a new standard that ensures all land use activities in this zone are adequately serviced, particularly in relation to firefighting water supply. In order for FENZ to effectively respond to a fire emergency, it is vital for a firefighting water supply, and access to that supply, be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 in both reticulated and non-reticulated areas.</p>	<p><u>MUZ-SX Servicing</u></p> <ol style="list-style-type: none"> <li><u>1. Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></li> <li><u>2. Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></li> </ol> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA</u></p>
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				<u>PAS 4509:2008.</u>
30	<p><b>MUZ-R9 New buildings and structures and additions and alterations to existing buildings and structures in the Paraparaumu North Gateway Precinct.</b></p> <p>...</p> <p>Controlled activity standard</p> <p>...</p> <p>Buildings and structures shall have a maximum height of 10 metres (as measured by the height measurement criteria) and a maximum gross floor area of 1000m2.</p> <p>...</p>	Support with amendment	<p>FENZ supports MUZ-R9 to the extent that it provides a maximum height of 10m for any building and structure.</p> <p>Fire stations are typically 8-9m in height, therefore MUZ-R9 provides for the requirements of a new fire station.</p> <p>However, hose drying towers can be around 12 to 15 metres in height. FENZ considers that the inclusion of an exemption for hose drying towers from height standards better provides for the health and safety of the community.</p> <p>FENZ notes that MUZ-R9 is a controlled activity that requires comply with the permitted activity standards for buildings and structures in the MUZ. Therefore, subject to relief sought regarding the inclusion of a servicing standard for buildings and structures in previous submission points, FENZ supports MUZ-R9.</p>	<p>Amend height standards as follows:</p> <p><u>Exclude hose drying towers up to 15m from height and height in relation to boundary standards.</u></p>
31	<p><b>MUZ-R13 New buildings and structures and additions and alterations to existing buildings and structures where one or more of the permitted</b></p>	Support with amendment	<p>As discussed in previous submission points, FENZ seeks the inclusion of a matter of</p>	<p>Amend as follows:</p> <p><i>Matters of discretion are restricted</i></p>

<p><b>activity standards in MUZ-R6 is not met.</b></p> <p>...</p> <p>Matters of discretion:</p> <p>...</p>		<p>discretion that will provide Council with the scope to consider the sufficient provision of a firefighting water supply, and access to that supply, in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice.</p>	<p>to:</p> <p>...</p> <p><u>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
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#### SUB – Subdivision

32	<p><b>SUB-DW-Rx1 Subdivision of land creating new allotments in the General Residential Zone that complies with all controlled activity standards under rule SUB-RES-Rx1.</b></p> <p>...</p> <p>Controlled activity standards</p> <p>4. Water supply</p> <p>All new allotments, other than allotments for access, roads, utilities or reserves, where the allotments are in or adjoining areas which are served with a Council reticulated water supply, must be provided with a connection to the Council reticulated water supply laid to the boundary of the allotment.</p> <p>...</p>	<p><b>Support with amendment</b></p>	<p>FENZ supports SUB-DW-Rx1 insofar as it requires all new allotments within the GRZ to be provided with a connection to a reticulated water supply when located within a reticulated areas.</p> <p>However, FENZ considers it vital that new allotments within the GRZ are provided with a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. The provision of an adequate firefighting water supply is vital to ensure FENZ can effectively respond to a fire emergency in both reticulated and</p>	<p>Amend as follows:</p> <p><i>All new allotments, other than allotments for access, roads, utilities or reserves, where the allotments are in or adjoining areas which are served with a Council reticulated water supply, must be provided with a connection to the Council reticulated water supply laid to the boundary of the allotment.</i></p> <p><u>Where a connection to reticulated water supply system is available, all allotments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></p> <p><u>Where a connection to a reticulated water supply system is unavailable,</u></p>
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		<p>non-reticulated areas.</p> <p>FENZ considers it important that all subdivisions in all zones are provided with practical, physical and legal access directly to a formed legal road / right of way.</p> <p>A fire appliance requires, as a minimum, access which is 4 metres in width and 4m in height clearance, with a maximum gradient of 15% (and accompanying transition ramps).</p> <p>Typically, buildings more than 50m away from legal roads require site access to be designed to meet the Code of Practice to ensure fire appliances can access a fire.</p> <p>The proposed rules and standards do not guarantee that adequate site access will be achieved via new driveways to access buildings that are in access of 50m from the nearest legal road with an unhindered vehicular access width of 4m or more. FENZ considers this would pose an unacceptable risk to any new buildings, its occupiers and</p>	<p><u>or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p> <p>Add a new standard as follows:</p> <p><b><u>SUB-SX Access</u></b></p> <p><u>Every allotment must have practical, physical and legal access directly to a formed legal road or by way of a registered right-of-way.</u></p> <p><u>Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 50 metres when connected to a road that has a fully reticulated water</u></p>
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			any surrounding vegetation, as well as neighbouring properties and occupiers. It is requested that driveways which would be used to access buildings more than 50m from the nearest legal road be constructed to provide fire appliance access in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	<p><u>supply system including hydrants, must be designed to accommodate a fire appliance design vehicle of at least 2.5 metres wide and 13 metres long and with a minimum gross mass of 25 tonne including:</u></p> <ol style="list-style-type: none"> <li><u>1. a gradient of no more than 15% at any point; and</u></li> <li><u>2. a minimum clear passageway and/or vehicle crossing of at least 3.5 metres width at the site entrance, internal entrances and between buildings; and</u></li> <li><u>3. a minimum formed carriageway width of 4 metres; and</u></li> <li><u>4. a height clearance of at least 4 metres; and</u></li> <li><u>5. a design that is free of obstacles that could hinder access for emergency service vehicles.</u></li> <li><u>6. The provision of hardstand and turnaround areas with maximum gradient of 5% in all directions</u></li> </ol>
33	<b>SUB-DW-R23 Subdivision that does not comply with one or more of the activity standards for water, wastewater and stormwater or electricity and telecommunications under rules SUB-DW-Rx1, SUB-DW-R4 and SUB-DW-R5.</b>	<b>Support</b>	FENZ supports SUB-DW-R23 insofar as any subdivision that does not comply with one of more of the activity standards for water under rule SUB-DW-Rx1 is a non-	Retain as drafted.



	Non-complying activity		complying activity.	
34	<p><b>SUB-RES-R25 The following subdivisions:</b></p> <ol style="list-style-type: none"> <li><b>1. Boundary adjustments</b></li> <li><b>2. Subdivision of land where no additional allotments are created</b></li> </ol> <p>...</p> <p>Controlled activity standards:</p> <ol style="list-style-type: none"> <li>Each allotment must have legal and physical access to a legal road.</li> </ol> <p>...</p> <ol style="list-style-type: none"> <li>Public roads, public water supply systems, sanitary drainage systems and surface water drainage systems must be available to serve the subdivision.</li> <li>The relevant subdivision standards under Rules SUBRES-R26, SUB-RES-Rx1, SUB-RES-R27 and SUB-RESR28 must be complied with, including any additional restricted discretionary activity standards for subdivision attached as notations to structure plans. Where the zone standards and standards attached as notations differ, the notations shall take precedence.</li> </ol>	Support	<p>FENZ supports SUB-RES-R25 insofar as it includes controlled activity standard which require new allotments to:</p> <ol style="list-style-type: none"> <li>Have legal and physical access to a legal road</li> <li>Be serviced by public water supply systems</li> </ol> <p>However, FENZ considers fire safety matters are not sufficiently addressed under SUB-RES-R25 and therefore seek the inclusion of firefighting water supply and site access standards as per previous submission points.</p>	<p>Amend as follows:</p> <p><i>1. Each allotment must have legal and physical access to a legal road.</i></p> <p><u><i>Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 50 metres when connected to a road that has a fully reticulated water supply system including hydrants, must be designed to accommodate a fire appliance design vehicle of at least 2.5 metres wide and 13 metres long and with a minimum gross mass of 25 tonne including:</i></u></p> <ol style="list-style-type: none"> <li><u><i>a gradient of no more than 15% at any point; and</i></u></li> <li><u><i>a minimum clear passageway and/or vehicle crossing of at least 3.5 metres width at the site entrance, internal entrances and between buildings; and</i></u></li> <li><u><i>a minimum formed carriageway width of 4 metres; and</i></u></li> <li><u><i>a height clearance of at least 4 metres; and</i></u></li> <li><u><i>a design that is free of</i></u></li> </ol>

			<p><u>obstacles that could hinder access for emergency service vehicles.</u></p> <p>6. <u>The provision of hardstand and turnaround areas with maximum gradient of 5% in all directions</u></p> <p>Add a new water supply standard as follows:</p> <p><u>Where a connection to reticulated water supply system is available, all allotments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></p> <p><u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water</u></p>
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				<u>Supplies Code of Practice SNA PAS 4509:2008.</u>
35	<p><b>SUB-RES-R26 Except as provided for under Rule SUB-RES-R25, subdivision of land within the Coastal Qualifying Matter Precinct</b></p> <p>...</p> <p>Controlled activity standards:</p> <p>1. Each allotment must have legal and physical access to a legal road.</p> <p>...</p> <p>5. Infrastructure, access and services</p> <p>...</p>	<b>Support with amendment</b>	<p>As per the previous submission point, FENZ consider it vital for firefighting water supply and site access standards to be included in all subdivision rules. This will ensure that all new allotments are designed to consider FENZ's operational requirements and enable FENZ to efficiently and effectively respond to a fire emergency.</p>	<p>Amend as follows:</p> <p>1. <i>Each allotment must have legal and physical access to a legal road.</i></p> <p><u>Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 50 metres when connected to a road that has a fully reticulated water supply system including hydrants, must be designed to accommodate a fire appliance design vehicle of at least 2.5 metres wide and 13 metres long and with a minimum gross mass of 25 tonne including:</u></p> <ol style="list-style-type: none"> <li><u>a gradient of no more than 15% at any point; and</u></li> <li><u>a minimum clear passageway and/or vehicle crossing of at least 3.5 metres width at the site entrance, internal entrances and between buildings; and</u></li> <li><u>a minimum formed carriageway width of 4 metres; and</u></li> <li><u>a height clearance of at least</u></li> </ol>

			<p><u>4 metres; and</u></p> <p>5. <u>a design that is free of obstacles that could hinder access for emergency service vehicles.</u></p> <p>6. <u>The provision of hardstand and turnaround areas with maximum gradient of 5% in all directions</u></p> <p>Add a new water supply standard as follows:</p> <p><u>Where a connection to reticulated water supply system is available, all allotments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></p> <p><u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency</u></p>
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				<u>New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u>
36	<p><b>SUB-RES-Rx1 Except as provided for under Rule SUB-RES-R25 or SUB-RES-R26, subdivision of land within the General Residential Zone.</b></p> <p>...</p> <p>Controlled activity standards:</p> <p>...</p> <p>3. Each allotment must have legal and physical access to a legal road.</p> <p>...</p> <p>Infrastructure, access and services</p> <p>...</p> <p>9. Within the General Residential Zone at Te Horo Beach, a firefighting water supply must be provided which complies with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p><b>Advice Note:</b> Applicants should consult with Fire and Emergency New Zealand on a specific method of complying with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008, as part of preparing an application.</p>	Support with amendment	<p>FENZ supports SUB-RES-Rx1 insofar as it requires new allotments within the General Residential Zone at Te Horo Beach to be provided with a firefighting water supply which complies with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</p> <p>FENZ acknowledges the inclusion of a note advising applicants to consult with FENZ on the method of compliance with the Code of Practice. This is strongly support by FENZ.</p> <p>However, FENZ seeks to amend SUB-RES-Rx1 to ensure that fire appliances can access the firefighting water supply provided.</p> <p>Furthermore, as per previous submission points, FENZ requests that driveways which would be used to access buildings more than 50m from the nearest legal road be constructed to</p>	<p>Amend as follows:</p> <p>1. <i>Within the General Residential Zone at Te Horo Beach, a firefighting water supply<sup>1</sup>, <u>and access to that supply.</u> must be provided <del>which complies</del> <u>in accordance</u> with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</i></p> <p>Add a new standard as follows:</p> <p><u>Every allotment must have practical, physical and legal access directly to a formed legal road or by way of a registered right-of-way.</u></p> <p><u>Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 50 metres when connected to a road that has a fully reticulated water supply system including hydrants, must be designed to accommodate a fire appliance design vehicle of at</u></p>

			provide fire appliance access in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	<p><u>least 2.5 metres wide and 13 metres long and with a minimum gross mass of 25 tonne including:</u></p> <ol style="list-style-type: none"> <li><u>1. a gradient of no more than 15% at any point; and</u></li> <li><u>2. a minimum clear passageway and/or vehicle crossing of at least 3.5 metres width at the site entrance, internal entrances and between buildings; and</u></li> <li><u>3. a minimum formed carriageway width of 4 metres; and</u></li> <li><u>4. a height clearance of at least 4 metres; and</u></li> <li><u>5. a design that is free of obstacles that could hinder access for emergency service vehicles.</u></li> <li><u>6. The provision of hardstand and turnaround areas with maximum gradient of 5% in all directions</u></li> </ol>
37	<p><b>SUB-RES-R27 Subdivision of land which is not a controlled activity under SUB-RES-R25, or SUB-RES-R26 or SUB-RES-Rx1.</b></p> <p>...</p> <p>Restricted discretionary activity standards:</p> <p>...</p>	<b>Support with amendment</b>	As per the previous submission point, FENZ consider it vital for firefighting water supply and site access standards to be included in all subdivision rules. This will ensure that all new allotments are designed to consider FENZ's operational requirements and	<p>Amend as follows:</p> <p><i>3. Each allotment must have legal and physical access to a legal road.</i></p> <p><u>Any access to a site located in an area where no fully reticulated</u></p>

		enable FENZ to efficiently and effectively respond to a fire emergency.	<p><u>water supply system is available, or having a length greater than 50 metres when connected to a road that has a fully reticulated water supply system including hydrants, must be designed to accommodate a fire appliance design vehicle of at least 2.5 metres wide and 13 metres long and with a minimum gross mass of 25 tonne including:</u></p> <ol style="list-style-type: none"> <li><u>1. a gradient of no more than 15% at any point; and</u></li> <li><u>2. a minimum clear passageway and/or vehicle crossing of at least 3.5 metres width at the site entrance, internal entrances and between buildings; and</u></li> <li><u>3. a minimum formed carriageway width of 4 metres; and</u></li> <li><u>4. a height clearance of at least 4 metres; and</u></li> <li><u>5. a design that is free of obstacles that could hinder access for emergency service vehicles.</u></li> <li><u>6. The provision of hardstand and turnaround areas with maximum gradient of 5% in all directions</u></li> </ol> <p>Add a new water supply standard</p>
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				<p>as follows:</p> <p><u>Where a connection to reticulated water supply system is available, all allotments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></p> <p><u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
38	<p><b>SUB-RES-R29 Subdivision which is undertaken in accordance with the Development Incentives Guidelines set out in Appendix 1.</b></p> <p>1. Subdivision under this rule must comply with all other relevant subdivision standards unless</p>	Support with amendment	Subject to relief sought in other relevant subdivision standards, FENZ supports SUB-RES-R29.	Retain as drafted.



	otherwise specified in Appendix 1.			
39	<p><b>SUB-WORK-R36 Boundary adjustments and subdivisions where no additional allotments (other than reserves or legal road to be vested in Council) are created in the Local Centre Zone.</b></p> <p><b>SUB-WORK-R37 Boundary adjustments and subdivisions where no additional allotments (other than reserves or legal road to be vested in Council) are created in the Hospital Zone.</b></p> <p><b>SUB-WORK-R39 Except as provided for under Rule SUB-WORK-R33, the subdivision of land within the Metropolitan Centre Zone Structure Plan area that is consistent with the Structure Plan in Appendix 19.</b></p> <p>...</p> <p>Controlled activity standards:</p> <p>1. Each allotment must have legal and physical access to a legal road</p> <p>...</p> <p>3. Public roads, public water supply, wastewater and stormwater systems must be available to serve the subdivision.</p> <p><b>SUB-WORK-R40 Any subdivision of land in the Metropolitan Centre Zone which is not a controlled activity under SUB-WORK-R33 or SUB-WORK-R39.</b></p> <p><b>SUB-WORK-R41 Any subdivision of land in the Mixed Use Zone which is not a controlled activity</b></p>	<b>Support with amendment</b>	As per the previous submission point, FENZ consider it vital for firefighting water supply and site access standards to be included in all subdivision rules. This will ensure that all new allotments are designed to consider FENZ's operational requirements and enable FENZ to efficiently and effectively respond to a fire emergency.	<p>Amend as follows:</p> <p><i>1. Each allotment must have legal and physical access to a legal road.</i></p> <p><i><u>Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 50 metres when connected to a road that has a fully reticulated water supply system including hydrants, must be designed to accommodate a fire appliance design vehicle of at least 2.5 metres wide and 13 metres long and with a minimum gross mass of 25 tonne including:</u></i></p> <p><i>1. <u>a gradient of no more than 15% at any point; and</u></i></p> <p><i>2. <u>a minimum clear passageway and/or vehicle crossing of at least 3.5 metres width at the site entrance, internal entrances and between buildings; and</u></i></p> <p><i>3. <u>a minimum formed carriageway width of 4 metres; and</u></i></p> <p><i>4. <u>a height clearance of at least 4 metres; and</u></i></p> <p><i>5. <u>a design that is free of</u></i></p>

<p>under SUB-WORK-R34.</p> <p><b>SUB-WORK-R42</b> Any subdivision of land in the Town Centre Zone which is not a controlled activity under SUB-WORK-R35.</p> <p><b>SUB-WORK-R43</b> Any subdivision of land in the Local Centre Zone which is not a controlled activity under SUB-WORK-R36.</p> <p><b>SUB-WORK-R44</b> Any subdivision of land in the Hospital Zone which is not a controlled activity under SUB-WORK-R37.</p> <p>...</p> <p>Restricted discretionary activity standards:</p> <p>1. Each allotment must have legal and physical access to a legal road.</p> <p>...</p> <p>3. Public roads, public water supply, wastewater and stormwater systems must be available to serve the subdivision.</p> <p>...</p>			<p><u>obstacles that could hinder access for emergency service vehicles.</u></p> <p>6. <u>The provision of hardstand and turnaround areas with maximum gradient of 5% in all directions</u></p> <p>Add a new water supply standard as follows:</p> <p><u>Where a connection to reticulated water supply system is available, all allotments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u></p> <p><u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u></p> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water</u></p>
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				<u>Supplies Code of Practice SNA PAS 4509:2008.</u>
<b>GRUZ – General Rural Zone</b>				
40	<b>New objective and policy</b>	<b>NEW</b>	FENZ seeks a new objective that promotes the provision of infrastructure within the General Rural Zone. Further, FENZ seeks the inclusion of a new policy that ensures all land use activities in the General Rural Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to GRUZ-OX and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.	<p>Add a new objective and policy as follows:</p> <p><u><b>GRUZ-OX Infrastructure</b></u>  <u>Public health and safety is maintained through the appropriate provision of infrastructure.</u></p> <p><u><b>GRUZ-PX Servicing</b></u>  <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u></p>
41	<b>New rule</b>	<b>NEW</b>	<p>FENZ notes there are currently no provisions for the establishment of emergency service facilities within the GRUZ, and as such the activity could be considered a non-complying activity under current provisions.</p> <p>Therefore, FENZ seeks the addition of a new rule for 'emergency service facilities'.</p>	<p>Add new rule as follows:</p> <p><u><b>GRUZ-RX Emergency Service Facilities</b></u>  <u>Activity Status – Permitted</u></p>

			<p>New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. FENZ considers that adding a new rule for Emergency Service Facilities provides for emergency service facilities in this zone as a permitted activity is vital given PC2 will enable increased density and development. This will better provide for health and safety of the community by enabling the efficient functioning of FENZ in establishing and operating fire stations</p>	
<b>RLZ – Rural Lifestyle Zone</b>				
42	<b>New objective and policy</b>	<b>NEW</b>	<p>FENZ seeks a new objective that promotes the provision of infrastructure within the Rural Lifestyle Zone. Further, FENZ seeks the inclusion of a new policy that ensures all land use activities in the Rural Lifestyle</p>	<p>Add a new objective and policy as follows:</p> <p><b><u>RLZ-OX Infrastructure</u></b>  <b><u>Public health and safety is maintained through the appropriate provision of infrastructure.</u></b></p>

			<p>Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to RLZ-OX and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.</p>	<p><b><u>RLZ-PX Servicing</u></b>  <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u></p>
43	New rule	NEW	<p>FENZ notes there are currently no provisions for the establishment of emergency service facilities within the RLZ, and as such the activity could be considered a non-complying activity under current provisions.</p> <p>Therefore, FENZ seeks the addition of a new rule for 'emergency service facilities'. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations.</p>	<p>Add new rule as follows:</p> <p><b><u>RLZ-RX Emergency Service Facilities</u></b>  <u>Activity Status – Permitted</u></p>

			FENZ considers that adding a new rule for Emergency Service Facilities provides for emergency service facilities in this zone as a permitted activity is vital given PC2 will enable increased density and development. This will better provide for health and safety of the community by enabling the efficient functioning of FENZ in establishing and operating fire stations	
<b>RPROZ – Rural Production Zone</b>				
44	<b>New objective and policy</b>	<b>NEW</b>	FENZ seeks a new objective that promotes the provision of infrastructure within the Rural Production Zone. Further, FENZ seeks the inclusion of a new policy that ensures all land use activities in the Rural Production Zone are adequately serviced, particularly in relation to reticulated water supply or an alternative method for firefighting purposes. This will give better effect to RPROZ-OX and provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.	<p>Add a new objective and policy as follows:</p> <p><b><u>RPROZ-OX Infrastructure</u></b>  <u>Public health and safety is maintained through the appropriate provision of infrastructure.</u></p> <p><b><u>RPROZ-PX Servicing</u></b>  <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u></p>
45	<b>New rule</b>	<b>NEW</b>	FENZ notes there are currently no provisions for the establishment of	Add new rule as follows:

		<p>emergency service facilities within the RPROZ, and as such the activity could be considered a non-complying activity under current provisions.</p> <p>Therefore, FENZ seeks the addition of a new rule for 'emergency service facilities'. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. FENZ considers that adding a new rule for Emergency Service Facilities provides for emergency service facilities in this zone as a permitted activity is vital given PC2 will enable increased density and development. This will better provide for health and safety of the community by enabling the efficient functioning of FENZ in establishing and operating fire stations</p>	<p><b><u>RPROZ-RX Emergency Service Facilities</u></b></p> <p><b><u>Activity Status – Permitted</u></b></p>
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## Other proposed consequential or supporting amendments

46	<p><b>INF-MENU-R29 Residential buildings in all Rural Zones and the General Residential Zone at Te Horo Beach.</b></p> <p>Permitted Activity Standards:</p> <p>1. A potable water supply must be provided...</p>	Support with amendment	<p>FENZ supports INF-MENU-R29 insofar as it requires a potable water supply to be provided for all residential buildings in all rural zones and the GRZ at Te Horo Beach. However, for FENZ to respond to a fire emergency at residential buildings in the rural zone, it is vital an adequate firefighting water supply is provided whether the site is located within a reticulated or unreticulated area. Often, dwellings in rural zones are located outside of the reticulated network. A lack of reticulated water supply and increased response times in rural areas increases the fire risk to property, life and vegetation.</p>	<p>Amend as follows:</p> <p><u>Where a connection to reticulated water supply system is available, all residential buildings must be provided with a water supply, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p> <p><u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, an alternative firefighting water supply and access to that supply, must be provided for each dwelling in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
47	<p><b>ECO-R7 Trimming or modification of any indigenous vegetation that:</b></p> <p>...</p> <p>Activity status: Restricted Discretionary</p> <p>Matters of discretion:</p> <p>1. Effects on:</p> <p>...</p> <p>d. public safety;</p>	Support with amendment	<p>FENZ supports ECO-R7 insofar as it includes a matter of discretion relating to the effects on public safety.</p> <p>However, FENZ considers that a new assessment matter should be added in order to ensure that fire</p>	<p>Add a new assessment matter as follows:</p> <p><u>The degree to which the trimming or removal of affected vegetation will provide for the health and safety of people, property, and the environment through the</u></p>



			<p>risk mitigation is taken into account when assessing applications to trim or remove indigenous vegetation.</p>	<p><u>management of fire risk.</u></p>
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**From:** [Fleur Rohleder](#)  
**To:** [Mailbox - District Planning](#)  
**Subject:** PC2 submission  
**Date:** Thursday, 15 September 2022 12:01:56 pm  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[Submission - Kapiti Coast District Council - Plan Change 2.pdf](#)

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Kia ora,

Please see the attached submission regarding Proposed Plan Change 2 on behalf of Fire and Emergency New Zealand.

Ngā mihi,

**Fleur Rohleder**

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