

Kāpiti Coast District Council  
Private Bag 60601  
PARAPARAUMU 5254

26 August 2016

**Attention: Leanne Taylor (Hearings Administrator)**

Dear Leanne,

**New Zealand Fire Service Commission (Submitter #404 & Further Submitter #174) – Letter to be tabled for hearing: Proposed Kāpiti Coast District Plan (Chapter 6 Working Environment)**

The New Zealand Fire Service Commission (NZFS Commission) no longer intends to attend the hearing set for 12 - 20 September 2016, regarding the Working Environment provisions of the Proposed Kāpiti Coast District Plan. The reasons for that are set out in this letter, and we therefore request that this letter be tabled for the Hearing Panel's consideration in lieu of attendance.

The Council Section 42A Report is correct in its summary of the NZFS Commission's further submission point (#174), as set out in paragraph 1100 of the Report.

The NZFS Commission supported in part the submission points made by Submitters #191 and #221 on proposed provision 6A.1 requiring provision of access for fire appliances, in that it agrees that particularly in urban areas provision for fire appliance access onto a property is not always required. It is noted that, while submission points were only made on 6A.1, this matter also applies to the equivalent rules in 6B.1, 6C.1, 6D.1, 6E.1, 6F.1 and 6G.1.

Proposed Rule 6A.1.1A(6) states:

*Each site shall have a formed vehicle access with the following minimum requirements:*

- a) 2.5 metres in width
- b) 2.8 metres in unobstructed height (i.e. clear from vegetation, buildings and structures)

**Note:** *This provision is to allow for the entry and exit of fire fighting vehicles access from a formed road.*

The NZFS Commission's further submission point requested the following changes:

*For development where a fire appliance is not able to reach either the dwelling or the source of fire fighting water supply from a public road in accordance with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008, the minimum access way width shall be* ~~*Each site shall have a formed vehicle access with the following minimum requirements:*~~

- a) 2.5 ~~4~~ metres in width
- c) 2.8 ~~4~~ metres in unobstructed height (i.e. clear from vegetation, buildings and structures)

**Note:** *This provision is to allow for the entry and exit of fire fighting vehicles access from a formed road.*

This request reflected the recognition that on-site fire appliance access is not required in every case. It also reflected the physical dimension requirements of a fire appliance when accessing a

property, as set out in SNZ PAS 4509:2008. The dimensions as proposed would be inadequate as a fire appliance would be physically unable to access a site.

The recommendation of the Section 42A report is to amend the wording of Rule 6A.1.1A(6) (and equivalent 6B – 6G rules) to state:

*Each site shall have a formed vehicle access with the following minimum requirements:*

- a) ~~2.5 metres in width~~*
- b) 2.8 metres in unobstructed height (i.e. clear from vegetation, buildings and structures)*

**Note:** *This provision is to allow for the entry and exit of fire fighting vehicles access from a formed road.*

#### Width aspect

The Section 42A report recommendation has been made in recognition that Rule 11P.1.14.3 of the Infrastructure chapter is a district-wide rule that (according to the Section 42A recommendation) requires a minimum access way width of 3m across the whole district, and therefore addresses the width requirement for fire appliances (we note that we have requested in the NZFS Commission's hearing letter for the Infrastructure hearing that this be amended to 3.5m to be consistent with the latest recommendation in the supplementary Section 42A report for the Rural Environment). The NZFS Commission requests that the width aspect of these rules within the Working Environment chapter be retained (to be consistent with the requested 3.5m width in Rule 11P.1.14.3) in order to provide clarity to the Plan user that there is both a width and height aspect to provision of vehicle access for fire appliances.

#### Height aspect

The Section 42A report has recommended that the height aspect of Rule 6A.1.1A(6) (and equivalent 6B – 6G rules) be retained, as there is not an equivalent rule in the Infrastructure chapter that deals with access way height across the District. The NZFS Commission supports this aspect of the recommendation.

The Section 42A report also recommends that the height be retained at 2.8m in order to reflect what was recommended in the original Section 42A report on the equivalent Rural Environment provisions. However, the NZFS Commission wishes to note that, in the supplementary Section 42A report produced for the Rural Environment hearing, the Officer altered the recommendation to a 4m height, in response to the evidence tabled by the NZFS Commission for that hearing (this height reflects the required dimensions for a fire appliance).

#### Flexibility aspect

The NZFS Commission requests that the flexibility aspect of its further submission point be retained, as it is in agreement with Submitters #191 and #221 that on-site fire appliance access will not be required in all cases within an urban area, for the reasons discussed in its further submission. Including this flexibility aspect would not be inconsistent with the equivalent rules in the Rural Environment chapter, as it deals with situations within an urban environment as opposed to a rural environment, where it is much more likely that a fire appliance would require on-site access in all cases, to access both the firefighting water supply and a dwelling.

The NZFS Commission therefore requests that Rule 6A.1.1A(6), 6B.1.1A(6), 6C.1.1A(6), 6D.1.1A(6), 6E.1.1A(6), 6F.1.1A(8) and 6G.1.6(8) be altered to the wording below:

*For development where a fire appliance is not able to reach either the dwelling or the source of fire fighting water supply from a public road in accordance with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008, the minimum access way dimensions shall be Each site shall have a formed vehicle access with the following minimum requirements:*

- a) 2-5 3.5 metres in width
- b) 2-8 4 metres in unobstructed height (i.e. clear from vegetation, buildings and structures)

**Note:** This provision is to allow for the entry and exit of fire fighting vehicles access from a formed road.

#### Comments on Plan Integration matters

The Section 42A report has also made a comment that, in order to streamline the Proposed District Plan, the rules above and equivalent rules in the Rural Environment chapter could be better amalgamated into one rule within the Infrastructure chapter applying across the District. The NZFS Commission supports this suggestion, in the interests of ensuring consistency across the District and with assisting with District Plan usability.

The NZFS Commission therefore requests that it be involved in any further discussion on this option in the upcoming Plan Integration hearing set for late October 2016, in the interests of ensuring that any revised rule is worded to achieve the most effective outcome.

The NZFS Commission requests that the Hearing Panel take into consideration the points made above when coming to a decision on the approval of the Working Environment provisions in the Proposed Kāpiti Coast District Plan.

The NZFS Commission appreciates the opportunity to be involved in the Plan Review process, in the interests of promoting the safety of the community in regards to protection from fire.

Should you have any further queries please contact myself or Kerry Stewart (NZFS Principal Advisor Fire Risk Management) on (027) 249 4526 or [kerry.stewart@fire.org.nz](mailto:kerry.stewart@fire.org.nz).

Yours sincerely



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