

Appendix 10

Comments Received

Attachment 10 — Pre-Notification Consultation

The pre-notification consultation was a non-formal way for the public to provide Council with feedback prior to an actual Plan Change being notified under the formal Plan Change process specified in Schedule 1 of the Resource Management Act 1991.

Having investigated the Fire Safety Rules further and taken into account the concerns of submitters to Plan Change 2, Council has reconsidered the approach to fire safety.

Submitters to Plan Change 2 were emailed or posted an update on the Plan Change which also outlined a new approach that Council was considering (refer Attachments 9 and 11). Practitioners were also emailed seeking feedback on the new approach. Te Uri o Hau and Te Roroa were also made aware of the proposal and were given an opportunity to provide their feedback.

Furthermore, information was provided on Council’s website and advertised in local papers. People were encouraged to email, post or drop off copies of their comments to Council. Council received 48 comments from the community (including practitioners). Comments are included in a table below, these have been edited to improve readability and correct grammar mistakes only, there has been no interpretation of comments undertaken.

A drop-in session was also held on 22 June 2016 at Council’s Mangawhai office to allow anyone to come along, discuss and ask questions on the potential new approach with Council staff. There were seven people who took up the invitation to come along to the drop-in session.

Te Uri o Hau acknowledged the new approach and confirmed that they had no issues with what was proposed.

Feedback is provided in the table below:

Party	Particulars
Helen Curreen	My original submission opposed changes to the District Plan which seemed to me to be based on sound basic safety principles. The problem was really that of small section size which was never good planning nor envisioned under the previous plan or current one. The Council needs to ensure that lot sizes do not fall below 1,000m ² . Normal residential use requires plenty of water, so to allow small lot subdivision which fails to allow sufficient space for water tanks is very unwise.

Party	Particulars
	<p>The more recent proposals seem to involve communal water tanks, readily available by the fire service. Mangawhai has had such a system in the past. This is certainly practical in those areas which previously had communal tanks, but I don't know how viable that is in new subdivisions where there are no reserves or communally owned land or large road reserves.</p> <p>Council should realistically look at fire risk. I know I and others have been very concerned by the people who let off fireworks all year round. Probably holidaying visitors unaware of the local dangers. To allow this to happen is very dangerous. We had a situation last New Year of very, very, dry vegetation, fireworks, high winds and no power. This was a potential disaster.</p> <p>Mangawhai has many areas of scrub, manuka and pine; all highly inflammatory and close to housing.</p> <p>A Council Bylaw banning fireworks after the November Guy Fawkes until at least the end of April is urgently needed. There should be large signs at the three entry points to the Mangawhai urban area and significant penalties. This should be a ratepayer's responsibility to inform holiday rentals of such.</p> <p>Council's response to concerned residents last summer was disgraceful in its total lack of understanding of the risk involved.</p>
David Foster	<p>It is stated that Council needs a "Plan Change 2" type entity, but does it? If Council withdraws the current PC 2 it can progress requiring new subdivisions have community tanks provided as part of that infrastructure.</p> <p>The 5 minute away rule is a bit silly and messy to interpret in areas, don't put these sort of things in.</p> <p>As for new houses in existing areas just point out that household sprinklers along with smoke detectors are a good idea and leave it at that.</p> <p>I have seen a number of new homes go in around Mangawhai lately and I must say that the urban streetscape is being compromised with the front yard water tanks, some owners have tried to hide them or lessen their impact, but they are not aesthetic, Council must consider the urban environment as the liveable community and the harmony of the streetscape in existing context.</p> <p>Every household has insurance for fire, life safety is the critical issue, the brigade will always want its own water tanker to attend a callout because they then have a surety of their own safety, more household tanks don't help, in fact, they may cause more problems with people thinking they can be play fireman instead of getting themselves and their families clear of the property to safety.</p>

Party	Particulars
Wayne Birt	<p>It is a good idea to make the important area of firefighting water supplies easier to establish in a more practical way, and to keep development costs as low as possible.</p> <p>I think that the use of public water supply for firefighting using strategically placed tanks is a good solution that can be built on over time in more urban areas without reticulated systems. One trigger for these could be during residential subdivision. Development contributions for firefighting tanks could be introduced to spread the load of this cost and allow Council to consider a wider approach (across more than one development).</p> <p>I agree that firefighting water supply in more remote areas such as mine (1090 Bull Road) are of little use because of the distance from the fire service. House designs to allow for practical means of escape and the compulsory use of smoke alarms in all houses is a great idea.</p> <p>The practicalities of policing the availability of working smoke alarms do not work, so perhaps having a small budget to remind everyone to check alarms and replace batteries a couple times a year may be a more practical solution. With more public awareness this could help save a life or two.</p>
Tony Perry	<p>I am replying to your request regarding fire fighting.</p> <ol style="list-style-type: none"> 1 The responsibility for fire fighting belongs entirely to the Council. 2 The rules set by the Fire Service (Code of Practice) are meant for Reticulated areas e.g. towns and cities). Those places have Fire Hydrants installed to draw water from, the cost of this paid for from Rates. 3 The rules set by KDC are therefore unnecessary and are not a Fire Department requirement. 4 These rules are also illegal as Council has failed to notify the Proposal. 5 Council has also failed to provide any evidence of the incidence in the district of dwellings or other buildings being lost to fire as a result of Inadequate on-site fire fighting water supplies. 6 Setbacks of vegetation are another example of the absurd rules.

Party	Particulars
	<p>7 The Code of Practice is <u>an URBAN Standard</u> designed for cities with large multi-storey buildings and heavy aerial fire appliances. It is inappropriate to apply such standards to the small villages and rural areas of Kaipara where there are no large built up areas and where only small rural fire appliances are used.</p> <p>8 In case of fire on my property, the Fire Service, after using their own 9,000 litres of water, will use water from neighbouring properties as It will probably be too hot to get to my water tank.</p> <p>9 Mangawhai could have been reticulated when the sewage pipes were put in the ground. Water pipes could have been laid at the same time without any additional contractors' digging costs.</p> <p>In conclusion, I submit the whole project be scrapped, thereby ensuring Mangawhai does not acquire the name "Tank Town"!</p>
Doug Bone and Jacqui Duffy	<p>We support the proposed new approach to the Fire Rules.</p>
Nigel Slight	<p>If this is the correct forum I would like to address one of the points in Proposed Plan Change 2.</p> <p><i>c) The building is located at least 20m away from naturally occurring or deliberately planted area of scrub or shrubland, woodlot or forest; and</i></p> <p><i>Note 1: For fire safety, the New Zealand Fire Service advises that buildings should be at least 20m from the dripline of any tree and that these setbacks are also appropriate from scrubland and other similar vegetated areas.</i></p> <p>Regardless of whoever thought up this it is completely unworkable and totally fails to acknowledge the New Zealand lifestyle. Any section in New Zealand and Kaipara district will have vegetation within 20m. To deny that is to deny people the opportunity to make their sections anything other than barren.</p> <p>No normal domestic (or other) section in Kaipara and New Zealand could have vegetation that meets this criteria. Most if not every section would have a distance of less than 20m from building dripline to section boundary. This doesn't even take into account neighbours buildings and vegetation.</p> <p>It further denies people the right to build within a wooded area. This rule is untenable, draconian and unrealistic. Regardless of who proposed it, it should be removed. New Zealand is recognised for its "green" image let's keep it that way.</p>

Party	Particulars
David Stewart	<p>Resource consents</p> <p>The cost of applying to Council for a ‘fire safety’ only resource consent has upset a lot of ratepayers. The fee charged by Council for a ‘fire safety’ only resource consent is \$1,000.00. Written approval from the New Zealand Fire Service must be obtained prior to, and included with, the documents submitted with a resource consent application to Council.</p> <p>The New Zealand Fire Service does not charge any fee for providing this approval. As far as I am aware no justification for this seemingly huge fee has ever been made by Council.</p> <p>Water tanks</p> <p>In order to provide 10,000 litres of water for fire-fighting purposes only a second water tank is required. This incurs an additional cost of anywhere between \$6,000 and \$10,000 on the homeowner.</p> <p>Practicalities of the existing rule: It is virtually impossible to place a dwelling, turning area (8m radius circle), and 2 water tanks on a residential section and leave sufficient accessway for the Fire Service to utilise the water provided within the guidelines of the Health and safety Act.</p> <p>Public Water Supplies:</p> <p>The Fire Service requires that alternative water supplies be no more than 90m from the fire. Any public supplies therefore will have to be placed within 90m of each building along any one street. I shudder to think about what the cost and visual impact of providing such a service would create.</p> <p>NZ Building Code:</p> <p>As I understand it the New Zealand Building Code does not mention the provision of providing water, apart from rising mains, to fight fires.</p> <p>Effective Fire Service:</p> <p>I doubt that any volunteer fire service could attend a fire in less than 15 minutes even if the fire is only a 5 minute drive from the fire station. Therefore, from a 5 minute drive point of view – nobody lives within an effective fire service area. Some research needs to be undertaken with the Fire Department to arrive at a more practical response period.</p>

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	<p>20m Drip Line:</p> <p>The strict application of this rule in residential areas especially would entail the removal of all trees, including fruit trees, and shrubs from properties and, in many instances, from the roadways servicing these properties.</p> <p>District Plan Requirements: For the above reasons I believe that there should be no requirements in the District Plan for the provision of water for fire-fighting purposes. The fire trucks attending a fire come with their own water tankers and the Fire Department has the right to access and use any alternative water supplies as it sees fit to control the fire.</p> <p>Let's face it, if we are totally honest, by the time a volunteer Fire Service get to attend any fire, they are there to control the fire only and stop it spreading, not save the building on fire.</p>
<p>Karen Pegrume</p>	<p>I own a section at Emay Crescent, Pahi.</p> <p>There is currently on the main road into Pahi just at the edge of the settlement two concrete water tanks that are on a continuous feed to I understand the camp ground.</p> <p>My section could if there is a fire be easily accessed to those tanks by the fires service.</p> <p>I think the most appropriate outcome if a dedicated firefighting supply is required is that there is:</p> <ul style="list-style-type: none"> (a) Reliance on all the surrounding water tanks; (b) Some dedicated tanks the fire service can draw from set in road reserves or within new developments a dedicated tank adjacent to road reserves; (c) Not the specified coupling on domestic tanks; (d) Not a required storage level for domestic tanks (due to (a)). <p>I know fires are an issue but by the time a fire truck gets to a burning house the house will be beyond repair. The key thing is safe exits and fire alarms etc.</p> <p>I consider it is a building code issue but the danger is if a rule is set for 45 litres in the building code then the problem gets even bigger and resource consents will be required or you simply never get the house signed off and it becomes a Court matter.</p> <p>Setbacks from bush in the Whakatane Plan are based on vegetation type for wild fires. A point worth looking at.</p>

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Bill and Christine Bygrave	<p>Bill and I attended the discussion session at the Hub.</p> <p>Our Conclusions and Summary</p> <p>Negatives</p> <ol style="list-style-type: none"> 1. We do not like the idea of compulsory tanks cluttering up sections - space issues - visual issues - practicality issues. <p>Positives</p> <ol style="list-style-type: none"> 2. Like the option of one or two tanks installed at the spring which continually runs at Wharfedale Crescent, as water storage for emergencies. 3. Like the possibility of using treated wastewater from the treatment station for fire fighting purposes. 4. Like the idea of one or more water tankers available for fire fighting options. 5. Local fireman at the discussion referred to the fact that water is readily available from neighbouring properties. 6. Consultation with local experienced firemen needed. 7. Long term issues should be considered.
Thomas Parsons	<p>Support the withdrawal of Plan Change 2.</p> <p>I believe that you will do both the Kaipara community and your own larger cause a great service if you quietly but forthrightly admit that the originally proposed new fire regulations were presented in error, and announce that the entire question of fire safety will be reformulated from the bottom up with the help and active participation of community members who know what is needed and what is feasible in our several different areas (as opposed to rural inland Australia), with due consideration of cost/benefit ratios.</p> <p>As things stand, the proposed rules, especially those regarding trees and water tanks, are so extremely inappropriate that they can only be seen as comical or outrageous. They could inspire political cartoons that all New Zealanders would instantly understand and relate to. As a serious proposal, these regulations could only be taken as evidence of gross incompetence on the part of those proposing them, or as a deliberately vicious demonstration of the magnitude of the powers granted to our un-elected local government by far-off Wellington. Since I have already heard the Commissioners referred to as the "Commissars" on more than one occasion, I suggest that the latter interpretation may hover in many already, and would resound across all of</p>

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	<p>New Zealand if the regulations extreme absurdity and their cost, both in dollars and impaired quality of life, become generally known.</p> <p>I do hope that you will agree that the interests of all parties will best be served by a fresh start here, rather than simply by tweaking the features of a monstrosity that was dead on arrival.</p> <p>I support the withdrawal of proposed Plan Change 2.</p>
Grant and Fiona Douglas	<p>The object of the plan to require households in the Kaipara district to have tanks for firefighting purposes. It seems an ill thought out concept done with little if any public consultation and by an un-elected Council. The consultation period and process in which Council has decided to implement this ruling leaves a lot to be desired and should be addressed sufficiently before implementation this ill thought out idea.</p> <p>Without going into too much detail at this stage; in today's world buildings are built to a higher specification with fire retardant materials incorporated into their design. Fire alerting systems are more reliable and therefore able to give a much earlier warning which in turn means earlier attendance by fire-fighting personnel. Nowhere in the developed world are there tank farms that are a mandated requirement for housing placed solely for fire protection.</p> <p>I urge you to engage with the public a period of consultation or better still, simply drop this idea and concentrate on more important matters currently affecting the Council.</p>
Ewan and Jenny Price	<p>We were alerted to the proposed changes to Plan Change 2 by an email from the MRRA. That is totally unacceptable.</p> <p>We filed a submission on the original change in January 2015. Nothing has been heard directly from you since. Surely if you have resolved to withdraw the change, and substitute a new one, the appropriate course was to withdraw and notify existing submitters of that. After that you could start the new procedure in accordance with the RMA. The current approach is designed to ensure that original submitters have no notice of the review. Those with the greatest interest as shown by their conduct, are deliberately deprived of an opportunity to have further input until the new Change is promulgated.</p> <p>In effect, you have taken the original submissions without reference to their authors, or any hearings, and formulated minor changes which you propose to introduce as a new change. That is the same lack of formal consultation which has caused such massive cost to the Kaipara community.</p>

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	<p>We have considered the review but have no reason to change our original submission. The whole proposal is so impractical it can never survive a sensible s32 evaluation. As noted in our original submission there is no building site within our 27.777ha orchard because we have trees all over it.</p> <p>Please therefore bring forward our original submission, not to this “consultation” which has no legitimacy, but to whatever plan change is next formulated in accordance with the RMA.</p>
Ashly and Beverly Gibbs	<p>If Council can waive the requirement for roadside tank placement for a fee then the need for such placement in the first place must be unnecessary.</p> <p>Is this another money grabbing tactic from those who the Council thinks can afford it?</p> <p>Water tanks abound on all sites in the area which have a house on them. Water can easily be sourced from the majority as required and replaced at a later date.</p> <p>Section sizes are getting smaller and planning to accommodate such a requirement can be very difficult especially since the Council also requires a vehicle turning bay within the section.</p> <p>Hundreds of new terrace houses in Auckland have garages opening directly onto the street with barely a cars length between the garage door and the footpath so why does Kaipara need a turning bay?</p> <p>We trust you will take these comments into consideration.</p>
Sam Southward	<p>Regarding the proposed changes to the fire regulations.</p> <p>These very draconian proposals definitely need much more discussion and consultation.</p> <p>In the overall scheme of things, surely it would be better to fund greater mobile tanker capacity, than to fund (by new homeowners) expensive and unsightly tanks.</p> <p>Also, the idea of tree dripline being 20metres from a house is almost laughable.</p> <p>Please let's get more facts available. I find it hard to believe such measures have a positive cost (ugly environment, expensive)/benefit (is there one)</p>

Party	Particulars
Robin Johnson	<p>I made a previous submission on Plan Change 2. That objection is equally applicable now as then.</p> <p>I would further comment that the proliferation of tanks I see today seems to ignore the fire services rule that a tank only needs to be within 90m of a property to protect it. Some new houses have not provided tanks presumably by referencing this rule but in other areas I see a tank in front of each house?</p> <p>Further the reduction in water volumes from those specified in the standard seems entirely arbitrary There is no provision in the standard for a reduction of this magnitude and despite requesting the fire service letter changing this it has not been made a public document. How can Kaipara be so different from the rest of NZ.</p> <p>It would be interesting to see a cost benefit analysis - my insurer is not interested in giving me a rebate because tanks have been provided.</p> <p>As pointed out previously spending money on water tankers is far more cost-effective.</p>
Penny Perkins	<p>The new fire regulations are over the top - I am opposed to all your new plans as once again being not the best way to be spending ratepayers' money.</p>
Jerry Pilmer	<ol style="list-style-type: none"> 1 My suggestion to assist fire safety/brigade is to purchase 1 or 2 more tanker vehicles/trailers for transport. 2 Set up connection to fill tankers from sewage treatment discharge with [... hoses – <i>unclear writing</i>] etc or pump. 3 Install pump in shed and main to hydrant connection on berm (Wharfedale Crescent) from large spring between end of Harbourview Street and Wharfedale Crescent. There is a walkway 13 and 14 ? - for tanker filling.
John Bull	<p>I am against KDC adopting Plan Change 2 for the NZ Fire Regulations to its District Plan for the following reasons:</p> <p>A Many sections are too small to accommodate the fire tanks needed by the regulations for both home use and fire suppression purposes in a rural community without a clean water delivery system.</p> <p>B House fires are notorious for the speed in which they consume property. It is generally a matter of minutes from the time a fire gets established until the heat crossover has it all but uncontrollable.</p> <p>C Unless a householder has appropriate fire suppression equipment in their house that has not been used at the fire outset, it is unlikely those in the house can do more than make an exit with very few possessions.</p>

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	<p>D It takes precious time for fire brigade members to get to the station and then have their equipment arrive at a fire. This time is such that few, if any, houses can be saved after the brigade arrives unless firemen are domiciled at the fire station.</p> <p>E The safety net is not availability of water at every house but rather the time taken for firemen to arrive and begin the process of suppression.</p> <p>F The NZ Fire Service Regulations with respect to household water tanks do not appear to have been adopted by many councils. Surely this fact alone ought to bring caution to adopting regulations that lack common sense, are expensive to householders, and will generally be of little use in their supposed objective.</p> <p>G After all where there is no reticulated water there will be a water tank that will on average hold sufficient water to control a fire if it is controllable. Should there be insufficient water on site then there will usually be neighbour's tanks not very far away. We ourselves have two tanks and one is normally full and the other half full or greater.</p> <p>H Please leave decisions of this type for a properly elected democratic Council which will certainly not happen in 2016 with two government appointees whose every wish must be followed or adopted by Council. This is not democracy.</p>
Richard Henry	<p>I don't believe there is any benefit, well justifiable benefit, in the storage of water for house fires.</p> <p>In 80% of cases there would be adequate water in the existing tanks. A combination of this and a supply in a fire engine should suffice.</p> <p>Unless we spend more money than many persons can afford, nothing will be perfect.</p> <p>In our case I believe it takes 20 minutes for the fire engine to leave (a voluntary brigade). It would then take another 20 minutes to get to our property, then a 700m drive and a couple of minutes to access the water. Yes it may work for a back yard fire. But I cannot imagine there would be much left of a house.</p> <p>ps. Our tank will be filled from the roof and spring water.</p>
John Dickie	<p>Context</p> <ul style="list-style-type: none"> • Submitted to original Plan Change No 2, with submission noting that I considered total removal of the Code of Practice from the District Plan FULL STOP.

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	<ul style="list-style-type: none"> • Discussions in interim with Chief Commissioner and briefly with KDC staff –effectively meaningless outcomes, and (perhaps) surprise that the background of how the Code of Practice had been included in District Plan, or in fact the contents of the Code of Practice were apparently unknown by the Chief Commissioner. • Attended workshop 23 June at KDC Mangawhai. Was more than surprised that KDC had apparently not done some basic preparation such as discussions with the Mangawhai Fire Service, but (and perhaps as a reflection that Commissioners take direction from Wellington) had instead talked with Fire Service in Wellington. • Have read the document as per https://secure.zeald.com/site/kaiparadistrictcouncil/files/District%20Plan/DP%202016/Plan%20Change%202%20-%20Update%20&20Summary%20Rpt%2008062016.pdf and will cut and paste some in my specific comments below. • Have myself talked with developers, general community members, and Mangawhai Fire Service members over last 3+years about this specific issue, and also the interaction of this and reticulated water supply that KDC has tried repeatedly to justify to the Mangawhai community via consultant studies for many years. Notably I have never been able to get from KDC any real indication of what might be a reliable centralised water source for Mangawhai. • Not of immediate interest to me as unlikely to be building soon, though do have an underlying concern about governance of KDC and whether ratepayers (including me) are getting “value for money”. • My comments below are focussed mainly on the Mangawhai situation, though some naturally have a wider context. <p>Overall comments</p> <ol style="list-style-type: none"> 1 KDC does not seem to accept that adoption of the Code of Practice into the District Plan is optional and not mandatory. The response that Head Office of Fire Service (based in Wellington) wants it should not overrule the expressed wish of Kaipara ratepayers. 2 Should drop Proposed Plan Change 2. 3 Do not believe it is appropriate <u>at this stage</u> for current KDC staff and Commissioners to spend any more time on working towards an alternative Plan Change.

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	<p>a) Current CEO and Commissioners have been tardy in addressing Proposed Plan Change 2; they are working out time until replaced in a very few months; and any new Proposed Plan Change should come out under authority of the newly elected Council.</p> <p>b) Any consideration of the financial and economic implications, and other implications such as relationship to house insurance, seems to have been total alien to KDC Commissioners and staff, either for the original District Plan, for the Proposed Plan Change No 2, and for work in the 18+months since Proposed Plan Change No 2 was open for public comment.</p> <p>c) There has not been the basic work (including but not limited to 2.2 above) undertaken that should underpin any new Proposed Plan Change.</p> <p>d) If anything, this basic work should be undertaken and any new Proposed Plan Change should be the responsibility of the new Council who will have to see it through.</p> <p>e) Unfortunately this recommendation will continue the ridiculous situation that currently exists (and which was first recognised by a few KDC staff several years ago) for some time, but hopefully a new CEO and elected Council can get it right, efficiently and considering the interests of the community. In effect, KDC has already accepted that the requirements as have been imposed are onerous, effectively non workable and not required. I realise that KDC will not do it (too good a source of revenue, but we do hear from the Chief Commissioner frequently that Council's finances are in great shape) but</p> <ul style="list-style-type: none"> ▪ from NOW, for all new houses in Mangawhai there should be automatic exemption from the Code of Practice in relation to supplying dedicated tanks, set back distances from vegetation/trees/shrubs – and that there be no cost to the owners to receiving this exemption. ▪ Any building consents etc that have already had the conditions imposed, but not yet implemented should be automatically and formally retrospectively exempted from these requirements. ▪ All monies that have been paid to KDC by owners seeking exemption in the past should be retrospectively refunded, together with interest paid at the same rate as KDC charges ratepayers for late rate payments.

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	<ul style="list-style-type: none"> ▪ Any persons who have installed the additional fire related tanks under KDC direction should be formally advised in writing that the owner may from now on use the tank, and water within, for whatever purpose the owner wishes. ▪ KDC uses the local paper to formally advise the community of all such changes; in the same manner that the KDC uses the paper to promote its own viewpoint on many other matters. <p>Specific comments:</p> <ol style="list-style-type: none"> 1 I propose that any future District Plan Change related to the Fire Code of Practice drop any requirement totally. The suggestion “The Code of Practice should be removed from the Land Use Rules, but retained within the Subdivision Rules and Engineering Standards”, is nothing more than moving the deck chairs on the Titanic. 2 I do not support “Introducing supporting issues, objectives, and policies for managing structural fires throughout the district as these are currently missing”, simply, why does the District Plan have to address this? Too many overlapping and onerous levels of bureaucracy. Rather than trying to find a reason to get involved, KDC should think of reasons NOT to unnecessarily complicate persons' lives. 3 I do support investigation of other alternatives that are totally outside the need for any consideration in the District Plan; with further sub-comments being: <ol style="list-style-type: none"> a) What is the use of “Advice Notices”?; a bureaucratic feel good, no actual legal enforcement and a cost to KDC (i.e. us as ratepayers) and possibly a cost to the developers/builders/owners who need to actually decide what it means and if they have to do anything (which if “Advice” means they do not have to do anything). b) I do support investigation, but with the Mangawhai Fire Service taking the lead, of the provision of supplemental fixed water supplies around urban and periurban Mangawhai, giving due consideration to sources of water (and be wide with this, including possibly spring water, stormwater, treated sewage effluent, and even estuary water), aesthetics of the tanks, effective use of public space. c) I do support investigation, but with the Mangawhai Fire Service taking the lead, of the provision of additional tanker water supplies.

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	<p>d) I do support the “Removal of the 20 metre dripline setback provisions from the residential and business zones” as this has both significant and plainly stupid effects on the ability to grow trees and shrubs in urban areas as well as difficulty in interpretation.</p> <p>e) The definition “Effective Fire Service means if your building is within a 5 minute drive from a New Zealand Fire Service Station” is difficult to interpret and effectively meaningless. What is a 5 minute drive?; at maximum allowable speed?, what about peak and non-peak times? For Mangawhai and depending on where the Fire Station is, some areas within the urban Mangawhai Heads or urban Mangawhai Village would be inside or outside of such a distance. Rather than that use a map to define boundaries.</p>
Grainne Taylor	<p>As a ratepayer, I do not want Council to adopt the proposal and request that the Council holds public meetings throughout the District to explain to the public the objectives of the proposal, the assessment of the proposal and the implications of the proposal. If it is deemed not in the best interest of the ratepayer, as voted by the ratepayers themselves, I request that the Plan Change be withdrawn.</p>
K and R Montgomery	<p>The above rules should be omitted from the submission until a democratic Council is elected. Once again the commissioners are not hearing what ratepayers want. Leave it alone and leave.</p>
Jon Drucker	<p>As mentioned in the general conclusions in the summary of plan change, the issue of fire safety for the community is a complex one.</p> <p>Due to these complexities, I feel that the proposals for fire safety need more input from ratepayers including public meetings to outline options.</p> <p>As a Mangawhai ratepayer I have objections to some of the proposed changes, and am sure that many other members of my community would too, if they were aware of what is on the table.</p> <p>Further, as a retired public safety officer, I understand how the need to provide public safety can make it difficult for an agency or council to find the most reasonable way to balance these safety needs without unduly impacting resident’s quality of life.</p>

Party	Particulars
	For these and other reasons, I implore you to postpone any plan changes until well-publicised public meetings can be held to help balance the need for safety without unduly impacting our qualities of life.
Andrew Mackintosh	I oppose this plan change. I am in support of the MRRA's position on this.
Kevin Wood	Fire Service Regulations Also I think that the Fire Safety rules should be completely omitted from the District Plan until democratic council is elected to consult with the people of the district as to what best suits the district.
Dan and Sue Rennie	We believe the Fire Service Rules should be completely omitted from the District Plan until a democratic Council is elected.
Norm and Veronica Johnson	The Fire Service Rules should be completely omitted from the District Plan until a democratic Council is elected.
Graham Drury	I understand that Council is reviewing its earlier proposal in respect of which I lodged the submissions referred to below. I would like Council to refer to those submissions and regard them as further submissions in respect of the proposed further changes. If the opportunity presents, I wish to be heard in support of those submissions.
Graham Drury – original submission as requested above.	<p>The specific provisions amendments of the proposal that our submission relates to are:</p> <p>a) The proposed amendments to Rules 12.10.26, 13.10.26, 14.10.26 15A.10.25 and 15B.10.25:</p> <p>b) The Evaluation and Plan Change (both as to content and process) having regard to the requirements of Section 32 of the Resource Management Act 1991 ('Act').</p> <p>Our Submission is:</p> <ol style="list-style-type: none"> 1 Council has failed to properly notify the proposal. 2 Council has failed to provide any evidence of the incidence in the District of buildings being lost to fire as a result of inadequate on-site fire fighting water supplies in support of its proposal to impose the changes proposed and that those changes are justified. 3 Council has rejected Option of the proposal arbitrarily and has provided no evidence or justification for taking such a position.

Party	Particulars
	<p>4 The proposed changes are inappropriate for Mangawhai Heads and other small villages and rural areas of the Kaipara and where there are no large built up areas and where only small rural fire appliances are used.</p> <p>5 The Mangawhai Volunteer Fire Brigade is equipped with fire trucks with significant water storage capacity which together with available domestic water tanks is more than adequate to deal with fire events intended to be covered by the proposed changes.</p> <p>6 We understand that the Mangawhai Volunteer Fire Brigade response times are such even if dedicated fire fighting water supplies were provided on site it is unlikely that they would be able to be used in time to save a building involved in fire from substantial damage or destruction in the event such a fire occurred.</p> <p>7 The cost to residential property owners of complying with the proposed changes are substantial and totally out of proportion to any possible benefits and would impose an unreasonable and unnecessary financial burden upon owners.</p> <p>We seek the following decision from Council</p> <p>Delete proposed amendments to Rules 12.10.26, 13.10.26, 14.10.26, 15A.10.25 and 15B.10.25 OR</p> <p>Decline the proposal; and</p> <p>Reconsider the whole matter of including the Fire Safety Rules in the District Plan de novo as a new proposal; and</p> <p>Obtain and properly notify all affected persons a new Section 32 Evaluation Report that is compliant with the Act and hold public meetings throughout the District to consult with the public in respect of all aspects of the proposal.</p>
<p>Dave and Karen Chisholm</p>	<p>These idiotic rules should be omitted from the District Plan until a democratic Council is elected. We are vehemently opposed to this in its present form.</p> <p>We have a property at Mangawhai Heads which is getting old and tired. We hope to rebuild the house and bring it up to a more modern standards.</p> <p>We have been hearing through other people some outlandish requirements by Council that they want upon application for building consent.</p> <p>I have been to Council offices at the Hub but haven't got any useful information from them, only pieces of paper full of Council Speak that an ordinary person like myself cannot decipher, not stating any specific rule or implementation, but full of</p>

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	<p>cross references to unknown other publications. However the gist of what I have heard, (not from Council), is that new consents requires a water tank in the front of every new house. This is madness. 99% of Mangawhai Heads properties are 1,000m² or less, with their own water supply, this means that every 25 metres of every road there is a water tank that could be accessed by the Fire Brigade if necessary.</p> <p>If and when we decide to upgrade our home and Council still requires this, the upgrading will not go ahead and we will be forced to leave the area we have enjoyed for 45 years, unless Council sees some sense on this matter.</p> <p>The whole situation of Fire requirements needs to be addressed and changed to something that reflects the requirements of a built up area such as Mangawhai Heads.</p>
Jonathon Larsen	<p>I have traversed many issues relevant to the fire safety rule in my earlier submission which you already have.</p> <p>By way of brief additional feedback I make the following points:</p> <ul style="list-style-type: none"> • Before regulating to fix a problem you first need to determine if there is a problem. This is called a risk assessment. • In instituting the fire safety rule the Council did not carry out any such risk assessment. In formulating the code of practice the Fire Service did not carry out any such risk assessment. Therefore the whole process is a sham. • RISK = LIKELIHOOD X CONSEQUENCE. You have also made no reference to the incidence of fire – neither has the Code of Practice. The incidence of fire is actually very low. If you are worried about the risk of low likelihood events then you should be building a Tsunami protection wall along the estuary at Alamar Crescent. • Buildings will catch on fire from time to time. With the possible exception of urban Dargaville, given volunteer response times, if a fire breaks out in a structure then it will not be saved. If the occupants are not able to self-evacuate then they will also not be saved. It doesn't matter how much water you require to be stockpiled in the vicinity it will be of no use other than to dampen down the ruins, and for that purpose the fire appliances on-board water tank, a neighbouring tanker or a water shuttle with a second responding appliance can be used i.e. the consequence of a building catching fire is that it will not be saved. • When a RISK or HAZARD is identified a CONTROL MEASURE needs to be put in place. Not only have you not identified a real RISK, the control measure (storing water everywhere) does not work because the rate of fire development and the delay in

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	<p>volunteers responding combined mean that the water will not be used. Placing static Council owned water tanks all over the place is also a complete waste of time for the same reasons.</p> <ul style="list-style-type: none"> • You need to stop kowtowing to the Fire Service and holding behind closed doors meetings with them to form pre-determined positions at the exclusion of the ratepayers who are actually the ones affected by these ridiculous rules. If the Fire Service wants to be involved in the process then it can submit and be heard like everyone else. • Fire appliances also do not need to get close to water tanks to draft from them – the house will be on the ground by then due to the time required to get into position and set up and places the appliance at danger due to proximity to the building. Normal practice would be to feed the main pump using a portable pump. Once again just ask I can show how this is done practically and draw on the expertise of others in the know. • Dripline setbacks – in imposing these rules you have also failed to provide any evidence that there is a problem. Disregarding the rule for some zones and not others is not logical – if it's a problem it a problem for all buildings. All you do by imposing it on rural and Maori is make it impossible for them to use trees for amenity reasons around buildings. There is no problem relating the proximity of vegetation. We do not have the fire environments of Australia and California that seem to cause media sensationalism – our vegetation type, rainfall and climate are very different. • If you want to regulate to require a coupling for Fire Service or others to use to draw water from domestic water tanks then just ask – I have a system that will work for this that I am happy to advise you on – that might not be a bad idea and is probably all you need in the way of a control measure. • Yes if you are going to withdraw the original plan change then you have a duty to notify a new one. • To achieve a fair and practical outcome the Council should scrap all of the rule except if it must, require a universal coupling to be fitted – as per above offer – to the domestic water supply tank of new buildings. • However the appropriate time for that to occur is in a few months when a democratically elected Council is in place, people who have some skin in the game in the district, not appointed non-resident commissioners.

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RA Kitchener	<p>Re proposed change to fire service regulations</p> <p>Most of the Mangawhai ratepayers <i>[have]</i> no knowledge of the new proposals in this regard. The proposals need far more input from the ratepayers including public meetings to outline the options.</p> <p>Commissioners who are not democratically elected SHOULD NOT decide such issues. Decisions like this should not be made in haste and must be made only by ratepayers' democratically elected representatives.</p> <p>Politics needs to be taken out of the issue and the pressure from the bureaucratic NZ Fire Service. Any provisions that are adopted must be reasonable and cost effective and would above all genuinely improve fire safety.</p> <p>At present our local Mangawhai Fire Brigade, and no doubt other Brigades, use water tankers. The Mangawhai Brigade is successful and happy with this approach so why waste so much ratepayer money on considering other options.</p> <p>Education in fire prevention and simple preventative precautions are the only thing that will stop houses burning down. Anything else is a complete waste of time.</p> <p>The District Plan is supposed to protect the natural amenities and landscape of our communities and yet NZ Fire Service rules imposed run totally contrary to the fundamental principles behind the District Plan.</p> <p>Water tanks are a visual monstrosity, but a necessity. Fire fighting tanks are a greater monstrosity because they must be placed in a position that destroys the amenity values of the residence and are a total blight on the landscape. They are not necessary. The water tanker that accompanies the local Fire Brigade is far more appropriate and is immediately ready and available to provide water within seconds.</p> <p>The concept of community water tanks makes me totally shudder – ugly, great hulking units that are placed in a manner so as to ensure that all of Magical Mangawhai's notoriously beautiful landscape and surround becomes a total eye sore to all who live or venture to visit and enjoy the area.</p> <p>I believe that the ratepaying people and community of the district need to have consideration and a genuine say on the above matters via their democratically elected representatives.</p>

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<p>Multiple parties with the same comments. – These include: Mrs M J Macfarlane, Florian Primbs, Belinda Sellars, Jan and Barry Clark, Wayne Love and</p>	<p>Complex issue not understood “The issue of fire safety for the community is a complex one”. Those are the opening words of the General Conclusions in the Summary of Plan Change. For that reason a decision should not be made on the proposals in the process being followed by KDC. Although there is strong feeling of resentment in the community about the Fire Service Rules, ratepayers and interested parties are generally not aware of the new proposals and they are unaware that they are open to submissions at present. They also have no understanding of the complex issues that have arisen because of insufficient publicity. The proposals need far more input from ratepayers including public meetings to outline the options. Perfunctory consultation does not meet the mark when complex and important issues are at stake.</p>
<p>Elizabeth Mill, Jeff and Sue Wesley, Patrick Sparks,</p>	<p>Submission links not working We also note that the Online Submission link does not work. As with consultation in respect of the Wastewater policy, the link on the KDC website is not working so ratepayers cannot make submissions.</p>
<p>Greg and Glenys McBain, Jorg Nordmeier and Barbara Thomas, William Koster, Robert Corbett, Mike and Francis</p>	<p>Commissioners who are not democratically elected should not decide such issues Important issues such as this should not be decided by commissioners. The commissioners are appointed by central government and are answerable only to central government under their terms of reference. They are not obliged to take into account the views of ratepayers. They also have a track record of going through motions of consultation having already made predetermined decisions based on the instructions they receive from Wellington. The matter has sat dormant for over a year and it now appears that the commissioners are trying to tidy it up before they leave. Decisions like this should not be made in haste and must be made only by ratepayers democratically elected representatives.</p>
<p>Hooking, Alan Preston, Bruce and Heather Rogan,</p>	<p>Concept of District Plans is Flawed It is ludicrous that every local authority has to go through the cost of making decisions about Fire Regulations for District Plans. Most Rules that govern our society are promulgated by central government and apply to the whole country. It seems quite unnecessary therefore that issues such as fire safety should be a matter that has to be decided separately for each individual council in the country. The cost is massive and it results in endless duplication.</p>

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<p>Jan Grover (Additional comments also provided below),</p> <p>David McGillivray (additional comment provided below),</p> <p>Clive and Judi Boonham (additional comments are also provided below),</p>	<p>In the same vein it is quite ridiculous that each council in the country has its own District Plan which costs many millions of dollars to draft and adopt and then incurs further unwarranted expense with numerous variations (such as this) and then after a few years it is abandoned and a replaced by a new District Plan. It is unjustifiable cost on ratepayers and simply serves as a teat for the Councils consultants and lawyers to suck off vast amounts of ratepayer money on a never-ending roundabout.</p>
	<p>Decision should be based on facts and not politics</p> <p>We need to take politics out of the issue and the pressure from the NZ Fire Service bureaucracy and other pressures that we are not aware of. We should examine the issue of fire safety based solely on facts. That means that any provisions that are adopted must be reasonable and cost effective and would genuinely improve fire safety. Certainly sprinkler systems would help, so would building houses out of non-combustible material, but the costs involved defeat the purpose.</p>
	<p>Existing properties are not affected</p> <p>Any new provisions are prospective and do not affect existing houses so they are only going to apply to new houses which represent a very small proportion of the total number of houses in the District. It would be impossible to retrofit existing properties with the draconian requirements proposed. Most of the properties in the older parts of town will not be affected (except for chopping down all of their trees) and the rules will simply impose totally unnecessary costs on new house builders.</p>
	<p>Tankers</p> <p>At present the Mangawhai Fire Brigade, and no doubt other brigades, use water tankers. The Mangawhai Brigade is happy with this approach. So why are we wasting so much ratepayer money on considering other options?</p>
	<p>Education</p> <p>Education in fire prevention and simple preventative precautions are the only thing that will stop houses burning down. Anything else is a complete waste of time. Other measures create extra costs for no benefits (unless you are a concrete tank manufacturer, the council is sucking in resource consent fees, or the Council's consultants getting their whack on each resource consent).</p>

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	<p>Natural Amenities</p> <p>We have been fervently critical of the tank-farm mentality in the past and the proliferation of tanks alongside the Harbour by the causeway just past the Museum is a perfect example. The District Plan is supposed to protect the natural amenities and landscape of our communities and yet the Fire Service rules imposed run totally contrary to the fundamental principles behind the District Plan. The KDC insists on extra side yards and front yards along the coastal marine area and then makes us destroy our trees and fill those areas with concrete tanks.</p> <p>Water Tanks</p> <p>Water tanks are a visual monstrosity, but a necessity. Tanks for household water usage are required continuously for the habitation of the house. The adverse effects are easily mitigated by placing the tank discreetly on the section and camouflaging it in some way.</p> <p>Firefighting tanks are a greater monstrosity because they must be placed in a position that destroys the amenity values of the residence and is a blight on the landscape. In addition, not only are they not necessary, there is no evidence to show that they serve any useful purpose besides enriching the local authority and its consultants. The chance of a house burning down from a fire is minimal and the chances of a dedicated tank fire fighting tank being of any assistance is remote.</p> <p>Smaller tanks as proposed are pointless. They have the same drawbacks as larger tanks and provide nothing that a tanker could not provide. They are simply a nod to bureaucracy so that those who promoted these appalling rules do not feel too shame-faced. The water tanker that accompanies the Brigade is far more appropriate and is immediately ready and available to provide water within seconds.</p> <p>Community water tanks</p> <p>The concept of community water tanks is absurd. Where on earth are you going to place them? For instance in Alamar Crescent are you going to put a few along the reserve along the Harbour and ensure that Magical Mangawhai is well and truly transformed into a tank farm?</p>

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	<p>Drip-line</p> <p>The idea that all drip-line of all trees should be at least 20 metres from any house is utterly alien to New Zealand and especially to a place such as Mangawhai with its native flora and sea vistas. It would mean that on the average section there would be no trees or plantings.</p> <p>Such a rule may have a place in parts of Victoria, Australia with completely different fauna and a high chance of bush fires, but it is singularly inappropriate for New Zealand. Those who promote this type of proposal should go door knocking in Titirangi in Auckland to get a reality check on New Zealand and what we value in respect of our environment. In fact go door knocking in Mangawhai and see what sort of reception you get when you tell folk that they have to chop down all the trees on their section - just in case. Gardens denuded of plants and trees, and our vistas blocked by concrete tanks, is not what New Zealand is all about.</p> <p>Building becomes impossible</p> <p>With draconian regulations such as this the situation is reached where it is becoming impossible to build a decent size house on a normal section. By the time you have a 5 metre front yard and 3 metre side yards and tanks along the front with a concrete drive, hardstand and turning area for a fire truck - all to be a certain distance from any building- with the height to boundary provisions and the building coverage and impermeable areas rules, you are left with a pocket handkerchief size plot to build your home on. We understand there are ways around it. By paying vast sums for resource consents (with the ticket clipped by the KDC, its consultants and lawyers), to do what every house builder should be able to do as of right.</p> <p>Summary</p> <p>Ratepayers see the proposals as nothing more than a clip-the-ticket bureaucracy that the KDC is creating that serves no useful purpose in promoting fire safety in the District. For that reason the whole of the rule should be deleted and the matter left for the democratically elected council to consider de novo in future.</p> <p>The adoption of this option does not compromise personal and property safety as suggested in the Section 32 Evaluation Report. That is a glib generality that has no factual basis. Whoever made such a suggestion should be required to present the evidence to support this supposition.</p>

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	<p>The truth is that there is no evidence to show that the new rules have averted any threat to personal and property safety since they have been in force. Getting rid of them and their draconian consequences will have no effect on fire safety and will allow the people of the district to have a genuine say on these matters via their democratically elected representatives when they are eventually returned to power.</p>
<p>Jan Grover additional comments to above.</p>	<p>Concept of District Plans is flawed</p> <p>It is ludicrous that every local authority has to go through the cost of making decisions about Fire Regulations for District Plans. Most of the rules that govern our society are promulgated by central government and apply to the whole country. It seems quite unnecessary therefore that issues such as fire safety should be a matter that has to be decided separately for each individual council in the country. The cost is massive and it results in endless duplication. <i>Has the council even considered the cost to the environment for current and future generations of these hideous regulations which are at least short-sighted and at most a total over reaction to a perceived and unproven hazard? Already the legacy of these hastily implemented bylaws have created visual atrocities all over Mangawhai with tanks creating ugly and space consuming obstacles on already too small sections. Why not at least insist that these tanks be placed underground so that not only does the environment remain visually attractive but the space on top of the tanks be then available for other use. Surely there is a way of allowing access to the tanks by emergency personnel while preserving the environment from a legacy of ridiculous bylaws. When a municipal water supply finally arrives in Mangawhai (which it will need to do as Auckland rapidly expands), is the public going to be required to remove the tanks at their expense?</i></p> <p>Existing properties are not affected</p> <p>Any new provisions are prospective and do not affect existing houses so they are only going to apply to new houses which represent a very small proportion of the total number of houses in a district. It would be impossible to retrofit existing properties with the draconian requirements proposed.</p> <p>Most of the properties in the older parts of town will not be affected (except for chopping down all of their trees) and the rules will simply impose totally unnecessary costs on new house builders.</p> <p><i>The idea that the planting of new trees around new houses or removing of trees from existing houses is not only draconian it is surely contrary to a person's basic right to manage one's own property as one chooses. The assumption that conditions in one</i></p>

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	<p><i>area or country are the same for all areas or countries is absolutely unfounded and ridiculous! Where on earth are these ideas coming from!???</i></p> <p>Tankers</p> <p>At present the Mangawhai Fire Brigade, and no doubt other brigades, use water tankers. The Mangawhai Brigade is happy with this approach. So why are we wasting so much ratepayer money on considering other options? <i>Can the Council provide any proof whatsoever that the implementation of land-based water tanks provides a better outcome than the use of purpose built water tankers for the very remote chance that a house catches fire and is severely damaged? This decision simply cannot be based on comparative data in a totally different geological location. To be able to bypass this requirement by the payment of an exorbitant fee for those who can afford it makes a laughing stock of a so called necessary public safety requirement.</i></p> <p>Water tanks</p> <p>Water tanks are a visual monstrosity, but a necessity. Tanks for household water usage are required continuously for the habitation of the house. The adverse effects are easily mitigated by placing the tank discreetly on the section and camouflaging it in some way. <i>Why is it that there is apparently a requirement for tanks to be placed partially above ground to provide protection for fire crews, while no such protection exists in areas where municipal water supply is available?</i></p> <p>Firefighting tanks are a greater monstrosity because they must be placed in a position that destroys the amenity values of the residence and is a blight on the landscape. In addition, not only are they not necessary, there is no evidence to show that they serve any useful purpose besides enriching the local authority and its consultants. The chance of a house burning down from a fire is minimal and the chances of a dedicated tank fire fighting tank being of any assistance is remote.</p> <p>Smaller tanks as proposed are pointless. They have the same draw-backs as larger tanks and provide nothing that a tanker could not provide. They are simply a nod to bureaucracy so that those who promoted these appalling rules do not feel too shame-faced. The water tanker that accompanies the Brigade is far more appropriate and is immediately ready and available to provide water within seconds.</p>

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McGillivray additional comment to above	As a final point is council able to provide any evidence that any Kaipara building in the last 50 years has burnt to the ground due to the absence of a fire fighting water supply? To hit all ratepayers with the added expense of adopting the new fire service rules, including sprinkler systems and additional water tanks, reeks corruption.
Clive and Judi Boonham additional comments to above.	<p>SUMMARY</p> <p>I oppose the proposed changes to the District Plan and support Option 2 in the Section 32 Evaluation Report, namely that all rules relating to the Fire Safety Rules in the District Plan be deleted and reconsidered through a proper and RMA compliant Evaluation report and indepth, genuine consultation in compliance with the RMA.</p> <p>REASONS FOR MY VIEWS</p> <p><u>NOT MANDATORY</u></p> <p>The Code of Practice is not mandatory:</p> <p>1.2 Legal context</p> <p><i>This code of practice is non-mandatory but could be incorporated into relevant bylaws under section 146(b) of the Local Government Act 2002 or district plans prepared under the Resource Management Act.</i></p> <p>As I understand it, very few local authorities have adopted the rules in their district plans.</p> <p><i>How have Kaipara's neighbours responded to the Fire Code? Whangarei District Council has reference to the Fire Code in its Engineering Standards and it is considered at time of subdivision. The Far North District Council considers compliance with the Fire Code through a Resource Consent Assessment Matter when subdividing.</i></p> <p>Kaipara applies the rule not only at the subdivisional stage but also when any application is made for a building consent. No one, even on an old established section, can build a new house in Kaipara without complying with the rules.</p> <p>If it is not mandatory then it should not be included in a district plan without genuine, in depth, RMA compliant consultation with ratepayers.</p>

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	<p>That has not happened. It did not happen when the rules were originally incorporated into the plan in 2012 under a totally dysfunctional council, and under the guiding hand of Beca. It has not happened this time under a totally dysfunctional group of Commissioners, and presumably under the guiding hand of Beca.</p> <p><u>THE CODE WAS DESIGNED FOR URBAN AREAS</u></p> <p><i>Foreword</i></p> <p><i>This Code of Practice was developed to provide direction on what constitutes a sufficient supply of water for firefighting in urban fire districts.</i></p> <p><i>1.1 Aims</i></p> <p><i>This Code of Practice sets out what constitutes a sufficient minimum supply of water pressure and volume for firefighting in structures in urban fire districts.</i></p> <p>It is inappropriate to apply the Code in a rural area like Kaipara.</p> <p>In an urban area fire engines are available immediately and are close to any seat of fire. In rural areas the fire crews are generally volunteers and have to assemble and then travel longer distances to fires.</p> <p>By the time fire crews assemble and then travel to a fire, it is generally far too late to save the building or to rescue anyone caught in the fire.</p> <p>That is the reality of the situation. Having all the tanks in China lined up along the road frontage: having an unending supply of water; having a section totally denuded of trees and shrubs; having all one's lawns replaced with concrete driveways, turning areas and hardstands for fire trucks; none of these changes is going to make the slightest difference to the outcome if one is unlucky enough to have a fire in Kaipara.</p> <p><u>NEW DWELLINGS ONLY</u></p> <p>For those new houses built on sites in older developments, such as in Mangawhai, where a bach is removed and replaced by a modern home, the new property will have to comply, but it may be the only house amongst several thousand that is obliged to comply.</p>

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	<p>If the rules are so vital, why does that house have to comply with these rules and yet the others don't?</p> <p>Are the older houses at less risk than the newer one?</p> <p>Or are they already adequately catered for by the portable supply carried by the local brigade in combination with the domestic water tanks that every single house has?</p> <p><u>DEDICATED WATER SUPPLY UNNECESSARY</u></p> <p>What is wrong with the old system?</p> <p>In parts of Mangawhai there are no new houses that have to comply with the rules.</p> <p>So what happens to them?</p> <p>Are they at greater risk than new houses that comply with the rules?</p> <p>The answer is quite clear. New Zealand has managed very well with its fire fighting capability in the past in places like Mangawhai because each house has tanks that provide domestic water and in emergency the tanks on the property together with neighbouring tanks provide all the water that is needed to fight fires.</p> <p>The portable water provided by the fire brigade itself serves as an additional back-up.</p> <p>The 10m³ requirement is just silly given that a more than adequate water supply is generally available at every fire incident.</p> <p>What evidence is there that a 10m³ tank is going to make a blind bit of difference?</p> <p>Nothing will change for those existing houses. The fire brigade will continue to fight fires in those areas in the same competent way that it has always done, and generally too late to save the house, and the supply of water will rarely be an issue.</p> <p>In the extreme case where water is an issue, 10m³ is not going to make any difference.</p> <p>In new subdivisions, where the rules will apply universally, most new houses will have more than enough tank storage for domestic purposes which will be readily available for fighting any fire.</p> <p>These properties will be sensibly designed with provision for massive water storage and the obligation to provide an additional tank of 10m³ dedicated solely to fire fighting is nothing more than a bad joke.</p>

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	<p><u>PORTABLE WATER SUPPLY</u></p> <p>Because Mangawhai is mainly a rural area the volunteer fire service carries its own water for fire fighting in the form of over 2,000 litres in the tender itself and 6,000 litres in the accompanying tanker. That is a total in excess of 8,000 litres or 8m³.</p> <p>As over 98% of the houses (built pre the rules) will not have dedicated fire fighting water tanks, the brigade's water supply together with water from household tanks is more than enough to extinguish the flames, or more likely to douse the embers, which are all that is normally left by the time the brigade arrives.</p> <p>If there is a genuine concern about shortage of water then the fire brigade should acquire a bigger water tanker than it has at present. It would be heck of a lot cheaper than installing thousands of tanks and would not turn Mangawhai and other townships into tank farms and concrete jungles.</p> <p>But, and here's the rub, there would be no money in it for the Council and its consultants whose sole aim appears to be to entangle ratepayers in pointless red-tape and bureaucracy so that it can extract resource consent fees out of them.</p> <p><u>THE RULES ARE DRACONIAN</u></p> <p>This is how the Council summarises the issues:</p> <p><i>The Fire Safety Rules in the District Plan have a number of requirements to ensure that fire safety issues are addressed. These requirements include that:</i></p> <ul style="list-style-type: none"> • <i>a building does not impede the movement of fire service vehicles or equipment or generally restrict access for fire fighting purposes</i> • <i>a building is located at least 20 metres away from shrub or forests (defensible space)</i> • <i>water supply for fire fighting and access to this supply complies with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice.</i> <p>Impede fire service vehicles</p> <p>These are the requirements:</p>

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	<p>6 FIRE SERVICE VEHICLE ACCESS TO WATER SOURCE</p> <p>6.1 Background</p> <p><i>The adequacy of a firefighting water supply includes not only an assessment of the water supply that must be available, but also the location, connections, marking, and access to fire hydrants to enable the water supply to be used. Roding widths, surface, and gradients where hydrants are located should support the operational requirements of Fire Service appliances. The compliance Documents for the New Zealand Building Code specify these requirements and have final authority, but in general the roding gradient should not exceed 16%. The roding surface should be sealed, and trafficable at all times. The minimum roding width should not be less than 4m. The height clearance along access ways (for example trees, hanging cables, and overhanging eaves) must exceed 4m.</i></p> <p>6.4 Hardstand requirements</p> <p><i>For a fire appliance to be effective it needs to be able to park in an area as close as possible to both the available water supply and the structure to be protected. This area is termed the 'hardstand'. For the standard fire appliance this area should not be less than 4.5m in width by 11m in length. However, given that the turning circle for this appliance is approximately 17.5m all reasonable effort should be made to meet this length.</i></p> <p><i>NOTE – An aerial fire appliance has a turning circle of 24.5m and needs a width of 6m to enable the stabilising struts to be deployed.</i></p> <p>How can this be possible on a 600 or 800m² section?</p> <p>And why should it be necessary?</p> <p>With the increase in side yards, front and rear yards in the new district plan, especially in overlay areas, with the requirement of a new dedicated fire fighting tank at the road side of the section, at a regulation distance from any building, and with the immensely draconian requirement for concrete access, hardstand and turning area for a fire truck on site, there is simply no room for a modern house on many older residential sections in the district.</p>

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	<p>It is a bureaucratic nonsense that has no place in any district plan and effectively turns a residential areas into a tank farm and concrete jungle.</p> <p>20 metres away from shrub or forests</p> <p>This is what the proposal states:</p> <p><i>dc) The building is located at least 20m away from naturally occurring or deliberately planted area of scrub or shrubland, woodlot or forest; and</i></p> <p>Note 1: <i>For fire safety, the New Zealand Fire Service advises that buildings should be at least 20m from the dripline of any tree and that these setbacks are also appropriate from scrubland and other similar vegetated areas.</i></p> <p>Seriously? We live in New Zealand. We pride ourselves on our bush and native trees. We fill our gardens with shrubs trees and flowers, whether native or exotic, because it gives us pleasure and enhances our lifestyle. That is part of being a Kiwi and enjoying the environment that we have been blessed with.</p> <p>The sight of the Pohutukawa in full bloom over Christmas and the gardens ablaze with colour and different hues of green, is one of the factors that makes New Zealand such a wonderful place to live.</p> <p>And now the Commissioners are planning to ban all that. No shrubs, trees or natural bush, whether natural or planted, within 20 metres of a building.</p> <p>I cannot think of anything more destructive of our unique Kiwi environment.</p> <p>When I pull down my bach and build my dream home, am I obliged to chop down all the palms that I have nurtured over the years, the nikaus that I have watered and protected so that their full beauty can be shared by all and sundry?</p> <p>Is it goodbye to my multi-coloured, brilliant display of Hibiscus that I cherish, and which give so much delight to me and others?</p> <p>Are my beloved avocados trees and the rest of my orchard, and my lawn where the grandkids play cricket and soccer, are they destined to become a concrete fire truck hardstand area?</p> <p>And is my magnificent pohutukawa, cherished over decades, going to be reduced to firewood and replaced by a concrete tank?</p>

Party	Particulars
	<p>All because of a bunch of bureaucrats in Wellington and a bunch of Commissioners who will hightail it out of Kaipara in a few months.</p> <p>And what of my neighbours pohutukawa that embraces virtually his whole section and droops gracefully into mine?</p> <p>He is not bound by these silly rules because he is not building. But will I have the right, and will the Council have the power, to draw a line 20 metres from my new home - and over halfway across his property - and insist that his pohutukawa is dismembered?</p> <p>It all defies sense, logic or reasonableness.</p> <p>And don't tell me that I can apply for resource consents to get exemptions. Why should I have to employ lawyers and consultants, at massive personal cost, and then pay ludicrous fees to Council's lawyers and consultants, and be obliged to beg the Wellington fire service bureaucrats, again at some massive cost, to allow me to build a simple house on my section, to live the lifestyle that I want, and to enjoy the natural amenities of this beautiful country? The very things that I should be entitled to as of right as a New Zealander.</p> <p><u>EVIDENCE</u></p> <p>What evidence has the Council collected and considered to show that the new rules are necessary or that they will make the slightest bit of difference to the protection of our houses and our lives from fire?</p> <p>Dedicated tank</p> <p>In respect of the supply of water, I have already considered that from several angles.</p> <p>In summary:</p> <p>There is no evidence that under the old system (that is without any application of the fire service rules) there was any problem with the supply of water, given the ample supply of water that is available in household tanks, and given the portable water carried by the fire brigade.</p> <p>An additional dedicated fire fighting tank with 10m³ would make absolutely no difference to fire fighting capabilities.</p>

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	<p>Hardstand and access for fire truck</p> <p>This is another bad joke that must have been dreamed up in Noddy Land.</p> <p>Those developing properties in Kaipara are already hamstrung with the ridiculous side, front and rear yard requirements, the impossibility of complying with rules relating to building coverage and impermeable surfaces, so much so that it is almost impossible to build a decent size house on a small section in Kaipara without a mountain of resource consents.</p> <p>And now we are told that we have to build a virtual concrete motorway on our properties to accommodate a fire truck juggernaut, with hardstand and turning area to boot.</p> <p>What evidence does the Council have that such a ridiculous requirement is going to make any difference to the fighting of fires in rural Kaipara?</p> <p>Has the Council ever considered what our Magical Mangawhai is going to look like with acres of concrete along every street frontage in the district?</p> <p>Take a look at the new tank farm on Molesworth Drive by the causeway and you will look get a glimpse into the future of Magical Mangawhai.</p> <p>Or are the requirements simply put in there so that they can be removed after an incredibly complicated resource consent process that enriches the Council, its consultants and lawyers, and the Fire Service?</p> <p>No trees and shrubs within 20 metres</p> <p>What is the evidence that the Council has for this extraordinary rule?</p> <p>What sort of warped minds decided to inflict such a rule on the people of rural, or for that case, urban New Zealand?</p> <p>It is an absolute disgrace and contrary to the amenity values that New Zealand strives for.</p> <p>What evidence is there that my lemon trees, my avocados and my mandarins endanger my property?</p> <p>Are my exotic Hibiscuses a flaming inferno ready to explode?</p> <p>Has my iconic pohutukawa, which I always thought was highly revered in New Zealand, become a potential arsonist waiting to destroy my house?</p>

Party	Particulars
	<p>What a load of utter bunkum.</p> <p>We do not live in Victoria in Australia where bushfires are known to rage and the local flora is tinder-dry and explosive.</p> <p>Where is there any evidence of the danger of having trees close to a house in rural New Zealand?</p> <p>We actually live in temperate country where our native forests are not prone to bush fires and where a beautiful garden full of trees and shrubs and flowers has never been considered to be a fire risk.</p> <p>If being surrounded by timber creates a fire risk, how long will it be before the KDC bans wooden houses and insists that all houses are built of concrete, which would incidentally be totally in keeping with the concrete driveways and tanks that they are insisting must take over our gardens.</p> <p><u>OTHER DANGERS</u></p> <p>What are the chances of a fire destroying my house in Kaipara?</p> <p>One chance in 500 years?</p> <p>And would all the concrete tanks and concrete driveways, and the denuded gardens make any difference to the odds of the house being burnt down?</p> <p>None of those measures is going to make an iota of difference.</p> <p>If you want to stop houses burning down then the KDC should prohibit smoking inside, cooking anything on a stove, and ensure that all wiring is thoroughly up to date.</p> <p>They should also prohibit wooden houses and any materials inside a house that are combustible.</p> <p>The whole focus should be on preventing fires because when they happen in a rural area there is very little that can be done to stop them. The fire brigade will almost certainly arrive too late to save the house and any occupants caught in the blaze will be long dead.</p> <p>Life is full of dangers far more serious than the prospect of a house fire. More money is lost through burglaries than house fires and I would imagine that more money has been rorted out of the KDC coffers in the last 10 years than has been lost in domestic fires in Kaipara in that time.</p>

Party	Particulars
	<p><u>Non-Compliant Consultation</u></p> <p>Every ratepayer in the district is likely to be directly affected by the proposed change to the rules. The proposal relates directly to residential properties that do not have a reticulated water supply and that is the majority of properties in the district.</p> <p>New subdivisions will be affected the most, but so will all of those owners who wish to remove their bach from an older section and build a more modern home.</p> <p>Those who build on older sections, some as small as 600m² or 800m² already have massive problems complying with yard requirements and building coverage and impervious area rules.</p> <p>The new rules place an impossible burden on them with rules for a new tank, and at a minimum distance from any building, and severe requirements in respect of access, hardstand and turning area for a fire truck. On top of that is the no shrubs or trees requirements.</p> <p>Every person who owns property in Kaipara and more specifically Mangawhai is a potential builder of a new house and is going to be directly affected by the change in the rules.</p> <p>Clause 5(1A) of the First Schedule to the RMA requires you to notify:</p> <p><i>...every ratepayer for the area of the territorial authority where that person, in the territorial authority's opinion, is likely to be directly affected by the proposed plan;</i></p> <p>I understand that in respect of this proposal, you did not notify a single ratepayer individually.</p> <p>You chose the alternative option in clause 5(1A) to publish the notification in local publications, even though they are not delivered to many properties in the District.</p> <p>I also understand that as a matter of Council policy you do not advise individuals of any proposed changes. This is according to an email of Hannah Davies to Jonathan Larsen of 22 December 2014:</p> <p><i>We generally do not notify individual property owners of district plan changes, rather we rely on individuals to seek out information that may be relevant to their particular circumstances.</i></p>

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	<p>Another letter from Venessa Anich to Jonathan Larsen dated 23 January 2015 states:</p> <p><i>There seems to be a misunderstanding about who has been notified about Plan Change 2. No individuals were formally notified. This is not required under the First Schedule of the RMA.</i></p> <p>That advice is incorrect. Individual notification is required in certain circumstances under 5(1A), but the KDC chooses to ignore that requirement.</p> <p>There is an absolute obligation to notify personally <i>any other person who, in the territorial authority's opinion, is directly affected by the plan.</i></p> <p>The Council individually notified developers and builders of the proposed changes to various policies including the development contribution policy. Does the Council really believe that developers and builders are not directly affected by the proposed fire safety rule change?</p> <p>It also seems that the Council has made a predetermined decision to provide minimal notification, regardless of the fact that ratepayers will be directly affected, and regardless of the fact that the publications relied on are not delivered to all residential properties and Post Office boxes in the district, as required by clause 5(1A).</p> <p>I also note that the public notification has taken place over the Christmas break, which, taken with the failure to notify the individuals affected, suggests that the Council has deliberately taken steps to avoid full compliance with the requirements of the RMA.</p> <p>Given those circumstances the Council must re-notify the proposal and ensure that it is fully compliant with the Act.</p> <p><u>No consultation with affected People</u></p> <p>The KDC has not individually notified any ratepayers or builders or developers because it considers that they are not directly affected by the proposal, and yet it has consulted in depth with the NZ Fire Service about the proposal.</p> <p>The online consultation information provided by the KDC did not even include the most important document, the Fire Service Rules.</p>

Party	Particulars
	<p>This illustrates that the proposal and the original decision to include the rules in the district plan were based on complete compliance with the views of the Fire Service and do not take into account at all the views of those who are directly affected by the incorporation of the rules into the plan.</p> <p>The whole consultation process is defective.</p> <p><u>Unnecessary addition to building costs</u></p> <p>At a time when the Minister of Housing, Nick Smith, is moving heaven and earth to reduce building costs and all the bureaucratic red tape involved with house building, the KDC is entangling builders and ratepayers in a bog of bureaucracy and additional costs just to build a simple house on a simple section.</p> <p>Time for a very serious re-think. Are the Commissioners bent on lining the pockets of the Council and its consultants when they should be encouraging the growth and development of Kaipara?</p> <p><u>Reducing the value of properties in Kaipara</u></p> <p>I have already mentioned the impact that the new rules have on smaller existing sections. The new district plan has introduced new rules for building, especially in overlay areas, relating to yards, site coverage and impermeable surfaces that make it almost impossible to build an average house on the section as of right.</p> <p>The Fire Service Rules in the plan exacerbate the situation and have become a ratepayer's nightmare.</p> <p>My husband and I bought a retirement property at 27 Alamar property with an old bach, which was used for a holiday home. In late 2013 we sold our Auckland house and moved permanently to the bach. We had hopes of building our dream retirement home on the property.</p> <p>The section is 809 square metres and about 16.77 metres wide.</p> <p>Because of the yard requirements and building coverage and impermeable surface area rules one is forced to go double storey, BUT then one runs into height to boundary problems especially because of the closeness to the mean high water mark and having to lift the building.</p>

Party	Particulars
	<p>The Fire Service Rules are the last straw. I need a tank in my front yard destroying my view, and I also need a massive amount of concrete to replace my front lawn so that a fire truck can park itself there and perform its do si dos.</p> <p>That will take up most of my allowed impermeable area leaving very little left for my dream house.</p> <p>My dreams of creating a tropical wonderland have been completely crushed. I will have to go cap in hand to the Fire Service to approve every tree or shrub that I plant or wish to retain, and I may have to approach the KDC to remove the Banksias and Pohutukawas that line the seashore along Alamar Crescent. They come dangerously close to the 20 metre limit and clearly create a massive fire risk to my property and every other property in the street.</p> <p>We solved the problem by buying the existing problem next door. We were not prepared to run the gauntlet of madness that the Commissioners have imposed on the district.</p> <p>But we are now left with what was a million dollar section that should be graced with a magnificent property that is a virtually unsaleable as a development site because of the draconian rules that have been adopted.</p> <p>That loss in value is going to be seen throughout the District because of inclusion of the Fire Service rules in the plan.</p> <p><u>Other Submissions</u></p> <p>I also adopt the submissions of Kellie Roland and Jonathan Larsen</p> <hr/> <p>I seek the following decision from the Kaipara District Council:</p> <ol style="list-style-type: none"> 1. The Council does not adopt the proposal. 2. The Council reconsiders the whole matter of including the Fire Service Rules in its District Plan de novo as a new proposal. 3. The Council prepares a new Section 32 Evaluation Report that is compliant with the Act. 4. The Council notifies the proposal in full compliance with the provisions of the RMA AND holds public meetings throughout the district to explain to the public the objects of the proposal, the assessment of the proposal and the implications of the proposal.

Party	Particulars
New Zealand Fire Service	<p>Thank you for providing the New Zealand Fire Service (NZFS) with the opportunity to comment on the document 'Fire Safety within the Kaipara – Plan Change update and Summary of proposed New Approach.</p> <p>The NZFS agrees that fire safety is a challenging issue that requires a multi-pronged management approach. The NZFS also acknowledged the competing tensions that the Council must reconcile when determining an approach to the issue that is appropriate for its territory. The NZFS is committed to working constructively with the Council to arrive at the most effective approach to fire safety for the Kaipara district.</p> <p>The NZFS agrees with the Council's general conclusion that a form of plan change is required as part of the approach to fire safety issues.</p> <p>I set out the NZFS's comments on the more detailed components of the Council's proposal in below:</p> <p>Remove the Code of Practice compliance from Land Use rules, retain in subdivision rules</p> <p>The need for an adequate firefighting water supply applies to all new buildings, whether they require resource consent under land use provisions, subdivision provisions, or a combination of the two. Where reticulated services are not available, the NZFS considers that there needs to be a requirement to provide an adequate firefighting water supply - irrespective of whether the development requires resource consent under land use or subdivision provisions.</p> <p>The NZFS supports the retention of requirements relating to the Code of Practice in subdivision provisions, but considers the requirements should also appear in relevant land use provisions.</p> <p>It is not clear to the NZFS quite how proposal to retain Code of Practice requirements in subdivision provisions relates to the 'What does it mean to me?' table in the consultation document. The NZFS would be grateful for an opportunity to explore that with Council staff, to ensure it understands the proposal correctly.</p> <p>Introduce supporting issues, objectives, and policies for the management of structure fires</p> <p>The NZFS agrees that provisions identifying issues and stating related objectives and policies would be valuable and appropriate inclusions in the district plan. The NZFS supports this proposal.</p>

Party	Particulars
	<p>Investigate provision of community water tanks in areas without reticulated water supplies, as opposed to individual on-site supplies for each property</p> <p>The NZFS understands the rationale behind this concept and welcomes the opportunity to explore further. The potential efficiencies it offers are recognised, subject to the need to ensure that communal firefighting water supplies are adequately specified to meet NZFS's operational needs. Careful consideration will also need to be given to the mechanisms required to ensure that shared facilities are appropriately serviced and maintained over time.</p> <p>Rely on building code implementation through the building consent process</p> <p>The building code undoubtedly has a role to play in fire safety and the use of fire fighting water within buildings. However, it does not deal with the issues of how firefighting water supplies are provided to a property generally, or conveyed to a building.</p> <p>While the building code is a significant part of the overall approach to fire safety and firefighting water supplies, the NZFS does not consider that its implementation replaces the need to also require compliance with the matters addressed in the Code of Practice.</p> <p>Promote installation of sprinkler systems by including an advice note on each building consent, especially in areas located some distance from a fire station</p> <p>The NZFS supports initiatives that encourage the sprinkler-ing of buildings. That said, the NZFS considers that advice notes are likely to be most effective if they appear early in the regulatory processes for a development (e.g. the suggested inclusion of an advice note in the district plan that appears below). Building consent is frequently one of the last, if not the last, regulatory processes associated with a development and the consent is issued once major design decisions have been made. The opportunity to influence the design to incorporate sprinklers may well have passed by that point.</p> <p>Support NZFS fire safety education initiatives</p> <p>The NZFS is grateful for the inclusion of this aspect of the proposal and strongly supports it.</p> <p>Support the on-going use of water tankers to provide firefighting water supplies</p> <p>The NZFS recognises the operational value of water tankers and the range of tactical firefighting options they make available at fire incidents. However, their value is in part contingent on their being available to be deployed (i.e. not in use elsewhere) and able</p>

Party	Particulars
	<p>to reach a fire incident in a timely way. Dedicated, fixed-location firefighting water supplies are not subject to these vulnerabilities.</p> <p>Include an advice note in the district plan promoting the use of sprinkler systems in new buildings, especially those located some distance from a fire station</p> <p>As discussed above, the NZFS supports this initiative.</p> <p>Remove the 20m dripline setback provision from rural/business zones but retain the setback in rural and Maori Purpose zones</p> <p>The NZFS is comfortable with this proposal and observes that it does not regard the 20m dripline setback as an overly effective way of separating structures and vegetation in order to reduce the risk of spread of fire.</p> <p>Aside from the points above, the NZFS also has the following comments on other matters mentioned in the Council's consultation document:</p> <p>The first paragraph under the 'General Conclusion' heading refers to a rule requiring particular couplings that only NZFS can use. For avoidance of doubt, the NZFS does not require exclusive connections to firefighting water supplies e.g. tanks. It is quite comfortable with the idea that a supply may have multiple connections, so long as one of them marries with NZFS fittings. The NZFS recognises the benefit in property owners being able to access firefighting water supplies in the time before NZFS arrival at a fire, to be used if they can safely take initial steps to extinguish or prevent the spread of fire themselves.</p> <p>The paragraph immediate before the 'What does it mean for me?' heading indicates that the owners of firefighting water supplies that have been installed in accordance with existing rules will be able to use those supplies for domestic purposes, as opposed to keeping them exclusively available for firefighting (whether by the owner or the NZFS, as the case maybe). The NZFS is concerned about this suggestion, which - if acted on by property owners - may deprive properties of existing firefighting water supplies (i.e. a backward step relative to the status quo). The NZFS also queries whether the approach would require changes to existing resource consent conditions to be given effect.</p> <p>It is worthwhile highlighting relevant provisions in the Fire and Emergency New Zealand Bill that was introduced in Parliament on 30 June 2016. While the Bill still has to proceed through the Parliamentary process and consequently may be subject to change, I suggest that the provisions relating to a code of practice for firefighting water supply should nevertheless be taken into account as</p>

Party	Particulars
	<p>part of the Council's policy development in this area. The specific provisions are: Clause 62, which empowers the Minister to approve a code of practice for firefighting water supply recommended by the NZFS's (and other organisations') successor - Fire and Emergency New Zealand (FENZ).</p> <p>Clause 63, which requires FENZ to develop, consult on, recommend, and (if approved by the Minister) publish a code of practice for firefighting water supply. The Bill also provides for on-going 3-yearly reviews of the code of practice by FENZ.</p> <p>Compliance with the code of practice is likely to be mandatory, through the Bill's offence provisions. While regulations have not been made to specify all offences, failing to comply with standards for water supply volume and pressure set out in a code of practice are likely to be included: see the Department of Internal Affairs 'regulatory impact statement 'Fire Services Review: detailed policy design' (7 April 2016), at paragraph 41.3.</p> <p>This does not stop local authority bylaws or planning instruments made under the Resource Management Act 1991 from referring to the code of practice. On the contrary, it arguably heightens the need for firefighting water supplies to be addressed in a considered and integrated manner in such documents, as landowners and/or consent owners will not otherwise be able to avoid the need to comply.</p> <p>Thank you again for the opportunity to consider a comment on the Council's consultation document. The NZFS looks forward to continuing the working relationship with Council staff and other stakeholders that was generated during Plan Change 2, as the development of the proposal continues.</p> <p>Please direct any queries about the NZFS's Comments or any other request for further discussion to me Rob.Saunders@fire.org.nz or 04 439 7854 or Brad Mosby, Area Commander for the Whangarei-Kaipara Fire Area Brad.Mosby@fire.org.nz or 09 430 1253) in the first instance.</p>

Attachment 1 below shows all of the comments as they were received.

Paula A. Hansen

From: Helen Curreen ~~XXXXXXXXXXXX~~
Sent: Friday, 10 June 2016 2:33 p.m.
To: Plan Changes
Subject: Kaipara district plan change re fire service.

Submission from Helen Curreen

10/06/2016
10:00 a.m.

Kaipara district plan change re fire service.

My original submission opposed changes to the district plan which seemed to me to be based on sound basic safety principles. The problem was really that of small section size which was never good planning nor envisaged under the previous plan or the current one. The council needs to ensure that lot sizes do not fall below 1000sqm. Normal residential use requires plenty of water, so to allow small lot subdivision which fails to allow sufficient space for water tanks is very unwise.

The more recent proposals seem to involve communal water tanks, readily accessible by the fire service. Mangawhai has had such a system in the past. This is certainly practical in those areas which previously had communal tanks, but I don't know how viable that is in new subdivisions where there are no reserves or communally owned land or large road reserves.

The council should realistically look at fire risk. I know I and others have been very concerned by the people who let off fireworks all year round. Probably holidaying visitors unaware of the local dangers. To allow this to happen is very dangerous. We had a situation last New Year of very, very dry vegetation, fireworks, high winds and no power. This was a potential disaster. Mangawhai has many areas of scrub, Manuka and pine, all highly inflammatory and close to housing.

A council by law banning fireworks after November Guy Fawkes until at least the end of April is urgently needed. There should be large signs at the three entry points to the Mangawhai urban area and significant penalties. This should be a ratepayers responsibility to inform holiday rentals of such.

Council response to concerned residents last summer was disgraceful in its total lack of understanding of the risk involved.

Helen Curreen