Form 5

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

Clause 6 of Schedule 1, Resource Management Act 1991

By email to: planchanges@kaipara.govt.nz

To:	Kaipara District Council
Feedback from:	Fire and Emergency New Zealand
Address for Service	Beca Limited 6 Garden Place, Waitomo House Hamilton 3240 Attention: Alec Duncan Ph: 07 960 7259 Email: alec.duncan@beca.com

This submission is made on behalf of Fire and Emergency New Zealand (**Fire and Emergency**) to Kaipara District Council (**KDC**) on Private Plan Change 85 - Mangawhai East (**PPC85**).

1. Background:

Fire and Emergency's objectives and functions are set out in the Fire and Emergency New Zealand Act 2017.

Fire and Emergency's principal objectives are to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency's other principal objectives are to:

- protect and preserve life,
- prevent or limit injury,
- prevent or limit damage to property and land, and
- prevent or limit damage to the environment[1].

Fire and Emergency's main functions[2] are:

(a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and

(b) to provide fire prevention, response, and suppression services; and

(c) to stabilise, or render safe, incidents that involve hazardous substances; and

(d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and

(e) to rescue persons who are trapped as a result of transport accidents or other incidents; and

(f) to provide urban search and rescue services.

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

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

Fire and Emergency also has additional functions[3] to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform its main functions efficiently and effectively.

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

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

Territorial authorities and developers have an important role in ensuring that Fire and Emergency, as an emergency service provider, can continue to operate effectively and efficiently in a changing urban environment. As such, Fire and Emergency has an interest in the PPC85 to ensure that, where necessary, appropriate consideration is given to fire safety and Fire and Emergency's operational requirements.

1.1 Fire and Emergency's interests

1.1.1 Operational requirements

Firefighting water supply

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. To achieve this objective Fire and Emergency requires adequate water supply be available for firefighting activities. It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing, and that this water supply has adequate capacity and pressure available to service the future growth area. This may be firefighting water sourced from a reticulated water supply network, or where reticulation is not provided, alternative water sources will be required. This may be in the form of dedicated water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

The PPC85 Infrastructure Report states that there are three options for the provision of firefighting water:

(1) "*Reticulated from Borehole and stored in a central reservoir*
(2) *Buried tanks*
(3) *On-plot firefighting water (Plan Change 4, 10,000 l water for firefighting)*"

These options include both reticulated and non-reticulated water supply scenarios. The Planning Report states that PPC85 will be similar to the existing KDC Mangawhai Heads reticulation system, with a local borehole(s) feeding into a reservoir, with reticulation feeding fire hydrants within the Neighbourhood Centre, mixed use area and medium density housing area.

Fire and Emergency understands that the option/s will be further developed and the final system to provide firefighting water supply confirmed at resource consent stage.

Fire and Emergency seeks that the proposed PPC85 rule framework for the Mangawhai East Development Area adequately requires the consideration of firefighting water supply at the time of resource consent.

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

[4] There is an increasing need to respond to a wide range of non-fire emergencies, where Fire and Emergency often coordinate with and assist other emergency services. These include responding to motor vehicle accidents, medical callouts, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea. In 2023/24, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined (Source: Fire and Emergency New Zealand Annual Report 2023 / 24).

Emergency service access

The Fire and Emergency Designers Guide to Firefighting Operations (Emergency vehicle access **F5-02 GD**) provides guidance to ensure building designs comply with the New Zealand Building Code C5 – Access and safety for firefighting operations, Clause C5.6.

Fire and Emergency requires adequate access to new developments, associated buildings and the natural environment to ensure that it can respond in an emergency such as a fire, natural hazard, hazardous substances, medical or a rescue or assist. This includes both emergency vehicle access to the source of the emergency, as well as physical access by Fire and Emergency personnel to perform rescues and duties, which includes the use of lifesaving appliances such as ladders, hoses and stretchers.

Fire and Emergency considers it is vital for the health, safety and wellbeing of communities that the needs of emergency services are taken into account as new development is being planned. It is also important that future development areas such as Mangawhai East are designed to be well-functioning and resilient to ensure that communities are able to evacuate in the event of an emergency. If emergency response vehicles and/or personnel are not able to access people in the event of an emergency, this does not provide for well-functioning and resilient communities. In addition, limited access or inadequate infrastructure can place firefighters at significant personal risk, as they may unknowingly be operating in unsafe environments without sufficient water supply or escape routes.

For Fire and Emergency vehicles to access an emergency, adequate roading and accessway design is necessary to support the operational requirements of Fire and Emergency. The key requirements for emergency vehicle access are set out in the New Zealand Fire Service Firefighting Water Supplies Code of Practice (**SNZ PAS 4509:2008**) and F5-02 GD. The key access requirements are summarised below:

- To accommodate a Fire and Emergency vehicle, carriageways should have a minimum width of 4.0m. This can be reduced to a minimum width of 3.5m at entrances, provided tight turns are not required.
- Fire and Emergency needs vehicle access routes to have an unobstructed clearance height of at least 4.0m so that vehicles can pass through openings. This includes clearance from building construction, archways, gateways/doorways and overhanging structures (e.g., ducts, pipes, sprinklers, walkways, signs, structural beams, trees, hanging cables, etc.).
- Any carriageway with a dead end needs a turnaround area so that Fire and Emergency vehicles do not have to do multi-point turns to turn around. This is so Fire and Emergency personnel can move their vehicles quickly in an emergency to protect them. Fire and Emergency vehicles need to be able to turn a full 360° within a 25m circle (wall-to-wall clearance) to meet Waka Kotahi NZ Transport Agency requirements. The minimum turning radius of turnaround areas should be no less than 11.3m for pumping vehicles and 12.5m for aerial fire appliances.
- The maximum negotiable gradient is 1:5, but in general the roading gradient should not exceed 16%.

1.2 Operative District Plan fire safety provisions

1.2.1 Plan Change 4

Plan Change 4 was publicly notified on 14 October 2016. This plan change proposed changes to the Fire Safety Rules (Land Use) of the Operative Kaipara District Plan (**ODP**) for buildings and structures in the Rural, Residential, Business (Commercial and Industrial) areas. It proposed removing the requirement to comply with SNZ PAS 4509:2008. Plan Change 4 proposed that an issue statement, objective, three policies and a method be added to Chapter 2 of the District Plan to address structural fires instead.

Fire and Emergency appealed the decision made by KDC on Plan Change 4 to the ODP. Through negotiations and mediation, Fire and Emergency and Council agreed to a way forward. A decision on Plan Change 4 was issued via Consent Order from the Environment Court on 24 October 2018. Plan Change 4 was made operative on 18 December 2018.

This decision has been noted by the plan change proponent in their Planning Report and states that "*The new approach aims to help Council and applicants understand if there are potential fire hazards which may need to be considered at the time of subdivision consent applications, where sufficient firefighting water is not supplied"*.

Fire and Emergency has compared the fire safety provisions in the ODP to those proposed by PPC85. The relief sought in Fire and Emergency's submission (**Attachment 1**) seeks to align PPC85 provisions with the fire safety objectives, policies, rules and standards of the ODP and Environment Court decision.

Fire and Emergency would welcome the opportunity to work with the applicant on a way forward on this matter, prior to the PPC85 hearings.

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

Fire and Emergency seeks that KDC accept the amendments sought in **Attachment 1**.

Attachment 1 sets out the details of Fire and Emergency's submission, including the relief sought by Fire and Emergency to specific provisions in PPC85, and the reasons for the amendments.

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

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

Alec Duncan, Planning consultant

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

Date: 18/08/2025

Attachment 1. Fire and Emergency New Zealand (**Fire and Emergency**) submission

The following table sets out the specific submission and amendments sought by Fire and Emergency. Where specific amendments to provisions of PPC85 are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

Provision	Submission	Relief sought
DEV X Objectives		
Objective DEV X-O10 Infrastructure Servicing	**Support in part** Objective DEV X-O10 is supported in part, as it seeks to ensure that all development, other than in the Rural Lifestyle zone and the Residential Large Lot zone can provide sufficient water supply for firefighting use. Fire and Emergency however oppose the objective to the extent that development in the Rural Lifestyle zone and the Residential Large Lot zone is not required to provide a sufficient water supply for firefighting use. It is assumed that the intent of this objective is that these exempt zones will be unreticulated and therefore unable to connect to the wastewater and stormwater network and consequently would provide an onsite solution. However, based on the notified wording, this would also mean there is no requirement to provide sufficient water supply for firefighting use in these zones. Fire and Emergency seeks an amendment to DEV X-O10 to ensure that all development (i.e., buildings) in all zones of the Mangawhai East Development Area are required to provide a sufficient water supply for firefighting use.	Amend as follows: **DEV X-O10 Infrastructure Servicing** 1. Ensure all development, other than in the Rural Lifestyle zone and the Residential Large Lot zone, is connected to a reticulated wastewater network, and stormwater management network, and 2. Ensure all development ~~can~~ provides a reliable and sufficient water supply for both potable and fire-fighting water use, with fire-fighting water being continuously available to support emergency responses. or to similar effect.
DEV X Policies		
DEV X-P6 Infrastructure Servicing	**Support in part** DEV X-P6 is supported as a means of giving effect to DEV X-O10. Fire and Emergency supports the requirement to: *(1) Deliver reticulated water supply for firefighting.* *(3) Design and implement development on sites to ensure that onsite water supply can be provided by tanks located in visually screened locations or appropriately installed underground.* Fire and Emergency notes that three options have been proposed for providing firefighting water to the PPC85 area and include both reticulated and non-reticulated options.	Amend as follows: **DEV X-P6 Infrastructure Servicing** 1. Deliver reticulated water supply for fire-fighting. 2. Provide a reticulated wastewater network for all development, other than that in the Rural-Residential and Residential Large Lot zones. 3. Design and implement development on sites to ensure that onsite potable and fire-fighting water supply can be provided by tanks located in visually screened locations or appropriately installed underground.

Provision	Submission	Relief sought
	Fire and Emergency seek that DEV X-P6(3) is amended to clarify that onsite water supply includes both potable and firefighting water supply, consistent with DEV X-O10.	or to similar effect.
Policy DEV X-P7 Subdivision	**Support** DEV X-P7 is supported to the extent that it requires: *(1) Subdivision shall be designed to create sites consistent with the zone standards that can connect to, or accommodate onsite, all necessary wastewater, water supply, stormwater management services.* This would include a connection to, or accommodation of, a water supply that would include firefighting water use. DEV X-P7 is supported in this regard. *(6) Design and deliver subdivision so that sites are connected to roads, or access lots that minimise the creation of cul de sacs or rear lots from a one exit point.* The design and delivery of subdivisions whereby sites are connected to roads is essential for Fire and Emergency to be able to respond efficiently in a fire or other emergency. Minimising the creation of cul de sacs or rear lots from a one exit point is supported to the extent that in some situations, cul de sacs or rear lots can slow or prevent access to a site by fire appliances.	Retain as notified.
Mangawhai East Land Use Rules		
R X01 - Residential Zones and Rural Lifestyle Zone		
DEV X-LU-R1 Buildings, accessory buildings and structures	**Support in part** Fire and Emergency notes that land use standard DEV X-LU-S12 'Service Connections' exists but does not appear to have been applied to the rule framework. However, in some instances, DEVX-SUB-S7 Water Supply' has been applied to land use activities. The use and application of these standards is unclear and therefore this submission focusses on the application of DEVX-SUB-S7 Water Supply' in the absence of clarity. Fire and Emergency request that DEV X-LU-R1 be subject to DEVX-SUB-S7 'Water Supply' as this would require all new buildings in the Residential Zones and Rural Lifestyle Zone to be serviced by a firefighting water supply. It is noted that Fire and Emergency is also seeking amendments to DEVX-SUB-S7 'Water Supply' that is related to this relief.	Amend as follows: **DEV X-LU-R1 Buildings, accessory buildings and structures** **1. Activity Status: Permitted** **Where:** The construction, alteration, addition to, or demolition of any building, accessory building, or structure that complies with: … m. DEVX-SUB-S7 Water Supply or to similar effect.

Provision	Submission	Relief sought
	Currently, the land use rule framework only requires 'residential unit', and 'Homestay accommodation' to comply with DEVX-SUB-S7. While it is recognised that the Residential Zones and Rural Lifestyle Zone primarily anticipate residential activities, as DEV X-LU-R1 provides for the construction of any building, accessory building, or structure as a permitted activity, Fire and Emergency considers that all buildings enabled in the Residential Zones and Rural Lifestyle Zone should be required to comply with DEVX-SUB-S7 to manage fire risk. Fire and Emergency considers that this amendment would better give effect to Objective DEV X-O10 and DEV X-P6 which applies to all developments.	And any consequential changes to give effect to the relief sought.
DEV X-LU-R2 Residential unit	**Support** DEV X-LU-R2 is supported to the extent that it requires residential units to comply with: • xiv. DEVX-G-S3 Vehicle Crossings • xvi. DEVX-SUB-S6 Roads, accessways, pedestrian walkways and cycleways • xvii. DEVX-SUB-S7 Water Supply	Retain as notified, subject to any consequential changes to give effect to the relief sought elsewhere.
RX 02 - Business Neighbourhood Centre and Business Mixed Use Zones		
DEV X-LU-R1 Buildings and accessory buildings	**Support in part** Buildings and accessory buildings require resource consent as a restricted discretionary activity where the construction of any building, accessory building, or structure complies with DEV X-LU-R1. This rule appears incomplete or may be referring to another rule which is unclear. Similar to the relief sought to DEV X-LU-R1 above, Fire and Emergency requests that all new buildings in the Business Neighbourhood Centre and Business Mixed Use Zones are assessed as a restricted discretionary activity if compliance can be achieved with DEVX-SUB-S7. This would see that all new buildings in the Business Neighbourhood Centre and Business Mixed Use Zones can be adequately provided with a firefighting water supply.	Amend as follows: **DEV X-LU-R1 Buildings and accessory buildings** **1. Activity Status: Restricted discretionary** **Where:** The construction of any building, accessory building, or structure that complies with DEV X-LU-R1: a. DEVX-SUB-S7 Water Supply
DEV X -LU-R3 Visitor Accommodation	**Support** DEV X-LU-R4 is supported to the extent that the matters of discretion include consideration of the ability for the activity to be serviced with firefighting water supply and the provision of onsite access.	Retain as notified.
DEV X-LU-R4 Commercial	**Support**	Retain as notified.

Provision	Submission	Relief sought
Activities, Educational Facilities, Care Centres and Community Facilities	DEV X -LU-R3 is supported to the extent that the matters of discretion include consideration of the ability for the activity to be serviced with firefighting water supply and the provision of onsite access.	
Land Use Standards		
DEV X-LU-S6 Fencing and Landscaping	**Support in part** DEV X-LU-S6 is supported to the extent that DEV X-LU-S6(3) requires water tanks in front yards be screened with soft landscaping. As these water tanks may be for firefighting use, it is important that any screening with 'soft' landscaping does not inhibit or prevent access to tank couplings in a fire emergency. Maintaining accessibility for emergency access is vital, where water tanks are provided for the purpose of firefighting water use. Fire and Emergency requests that KDC clarify what 'soft' landscaping includes in relation to this standard.	Clarify what 'soft' landscaping includes in relation to this standard.
DEV X-LU-S12 Service Connections	**Oppose** Of relevance to Fire and Emergency is DEV X-LU-S12(2) which requires '*All occupied buildings shall be connected to a self-serviced water supply with sufficient storage as per Table 1.2*'. DEV X-LU-S12 does not appear to have been applied to any rules in PPC85. Therefore, its application is unclear. Further, Table 1.2 is unclear as to whether these volumes account for firefighting water supply and there is no specification that firefighting capacity must be maintained at all times. Clarification is required to determine whether the proposed firefighting water supply framework, particularly the standards specified above are adequate. It is noted that the term 'occupied buildings' is also not defined by the ODP. This should be defined to confirm applicable of this standard if applied to the rule framework. All new buildings, regardless of occupation, should be subject to fire safety considerations, including the need for firefighting water supply.	Clarify the application and relevance of this standard as it relates to firefighting water supply provision. Define 'occupied buildings'.
General Standards		

Provision	Submission	Relief sought
DEV X-G-S3 Vehicle Crossings	**Support in part** DEV X-G-S3 is supported to the extent that it requires new vehicle crossings on to roads be designed, constructed and located in accordance with the Kaipara District Council Engineering Standards 2011 and shall be formed with a sealed all-weather surface (DEV X-G-S3 (d)). Fire and Emergency however opposes DEV X-G-S3(e) which requires an accessway or driveway servicing up to 6 residential units to have a minimum vehicle crossing width of 3.0m. A minimum width of 3.5m is required by SNZ PAS 4509:2008 for fire appliance access. A reduced vehicle crossing width presents an unacceptable risk to Fire and Emergency operations. Fire and Emergency requests that the minimum vehicle crossing width for an accessway or driveway servicing up to 6 residential units be increased to 3.5m It is noted that where there is a non-compliance, matter of discretion (b) includes consideration of "the ability to provide for emergency vehicle access". This is supported.	Amend as follows: **DEV X-G-S3 Vehicle Crossings** 1. New vehicle crossings on to roads shall be designed, constructed and located in accordance with the Kaipara District Council Engineering Standards 2011 or any relevant update, and shall comply with the following: ... e. For an accessway or driveway servicing up to 6 residential units the minimum width shall be 3.~~0~~5m. ...
DEV1 Subdivision Rules		
DEV X-R1 Subdivision	**Support in part** DEV X-R1 is supported to the extent that all subdivision is subject to resource consent and subject to: • iii. DEV1-S13 Vehicle Crossings • iv. DEV1-S14 Roads, Vehicle Access, Pedestrian Walkways and Cycleways. • v. DEV1-S15 Water Supply. However, these standards do not align with the subsequent subdivision standards set out below and should be rectified. For the purpose of this submission, it is assumed that DEV X-R1(1)(m) is meant to refer to: • DEV X-SUB-S5 Vehicle Crossings • DEV X-SUB-S6 Roads, Vehicle Access, Pedestrian Walkways and Cycleways • DEV X-SUB- S7 Water Supply	Correct standard references.
DEV X-SUB-S5 Vehicle Crossings	**Support in part** DEV X-SUB-S5 is supported to the extent that it requires new vehicle crossings on to roads be designed, constructed and located in accordance with the Kaipara District	Amend as follows: **DEV X-SUB-S5 Vehicle Crossings**

Provision	Submission	Relief sought
	Council Engineering Standards 2011 and shall be formed with a sealed all-weather surface (DEV X-SUB-S5 (d)). Fire and Emergency however opposes DEV X-SUB-S5(e) which requires an accessway or driveway servicing up to 6 residential units to have a minimum width of 3.0m. A minimum width of 3.5m is required by SNZ PAS 4509:2008 for fire appliance access. A reduced vehicle crossing width presents a risk to Fire and Emergency operations, particularly in scenarios where on-site firefighting water supply is provided and therefore on-site access by a fire appliance is required to access that onsite water supply in a fire emergency. Fire and Emergency request that the minimum width for an accessway or driveway servicing up to 6 residential units be increased to 3.5m. Fire and Emergency support matter of discretion DEVX-SUB-S5(2)(g) which requires the consideration of 'Mitigation to address safety and/or efficiency, including access clearance requirements for emergency services'. This is supported.	1. New vehicle crossings on to roads shall be designed, constructed and located in accordance with the Kaipara District Council Engineering Standards 2011 or any relevant update, and shall comply with the following: ... e. For an accessway or driveway servicing up to 6 residential units the minimum width shall be 3.~~0~~5m. ...
DEVX-SUB-S6 Roads, Vehicle Access, Pedestrian Walkways and Cycleways	**Support in part** DEVX-SUB-S6 is supported to the extent that it sets out the minimum requirement for access and, in particular, legal and construction widths. Fire and Emergency requests that the terms used in the standard are used consistently so that it is clear to plan users as to what the standards applies to. Fire and Emergency also requests a new matter of discretion that requires consideration of access requirements for emergency services where there is a non-compliance with the access standards. This is consistent with DEV X-SUB-S5(2)(g) as notified.	Amend as follows: **DEV X-SUB-S6 Roads, Vehicle Access, Pedestrian Walkways and Cycleways** ... 2. Roads, Vehicle Access, Pedestrian and Cycle Networks shall be designed and constructed in accordance with the Kaipara District Council Engineering Standards 2011 or any relevant update, except as they relate to the following: ... 2. **Activity status:** Restricted discretionary Matters over which discretion is restricted: ... o. Mitigation to address safety and/or efficiency, including access clearance requirements for emergency services.

Provision	Submission	Relief sought
DEVX-SUB-S7 Water Supply	**Support in part** DEVX-SUB-S7(1)(a) is supported to the extent that, where a Council water supply is available and utilised, all allotments are required to be provided with a connection to the Council water supply. DEVX-SUB-S7(2) is however opposed. Where a public supply is not available or utilised, water supplies to all developments are required to meet the requirements in 'Table DEV1-2'. Table 1.2 is unclear whether these volumes account for firefighting water supply capacity and there is no specification that if it does, how much water storage must be maintained at all times for firefighting water use. Further, this table only relates to required tank volumes for on-site residential water supply and would not cover water supply requirements for non-residential activities (noting that DEVX-SUB-S7(2) relates to all developments, not just residential). While DEVX-SUB-S7(3)(c) includes a matter of discretion which includes whether 'Sufficient firefighting water supply is available', the requirement to demonstrate sufficient and reliably available onsite firefighting water supply is not required by DEVX-SUB-S7(2). Further, the 'note' under DEVX-SUB-S7(3)(c) is listed as a matter of discretion and is not a requirement of this standard. It is recommended that that this note is moved under the newly requested standard DEV X-SUB- S7(3) as note 2 which would be consistent with the ODP fire safety rule framework. Given the lack of clarity in regard to Table 1.2 and lack of requirement to demonstrate sufficient and reliably available onsite firefighting water supply, Fire and Emergency request an amendment to DEVX-SUB-S7 to address this deficiency.	Amend as follows: **DEV X-SUB- S7 Water Supply** … 3. Where a public supply is not available or utilised, all developments shall demonstrate sufficient firefighting water supply is available. Note: To determine what is a demonstrate sufficient and reliably available onsite firefighting water supply and to understand site- specific risks, Fire and Emergency New Zealand personnel are available to provide advice. or to similar effect. And any consequential changes to give effect to the relief sought.
Table DEV X Table 1.1 Mangawhai East Development Area Road, Private Way, Cycle Way and Property Access	**Support in part**	Amend as follows: **Road Hierarchy** Private access: 1. serving up to 6 units/lots, and 2. less than 50m in length, and

Provision	Submission	Relief sought

Road Hierarchy	Minimum Legal Width	Minimum Formation Width	Minimum Cycleway / Footpath Width	Surface	Maximum Design Speed	Minimum Radius (m)	Minimum SSD (m)	Maximum Grade
Private access serving up to 6 units/lots and less than 50m in length	3.6m	3m	0.5m (one side only where footpath is not provided separately)	seal	30km/h	6m subject to vehicle tracking for anticipated design vehicle		20% *Note: transition between two gradients shall not exceed 12.5%. if they do, separate transition gradient must be provided over a length no less than 2m.*
Private Accessway serving 7-30 units/lots (not vested) or serving up to 6 that is over 50m in length	9.5m	5.5m (no on street parking)	1.5m (one side only where footpath is not provided separately)	seal	30km/h	6m subject to vehicle tracking for anticipated design vehicle	30m*	12.5%

Table DEV X Table 1.1 is supported to the extent that private access serving 7-30 units / lots or serving up to 6 units (that is over 50m in length) meets the minimum emergency vehicle access requirements for formation width, surfacing and maximum gradient.

Fire and Emergency acknowledges that, in a scenario where a residential unit or lot is located in an area that is fully reticulated water supply and any building is within a compliant hose run distances as set out in SNZ PAS 4509:2008, Fire and Emergency, in most cases, would be able to operate from the road in a fire emergency.

However, where there is no reticulation available (including compliant hydrants), new lots would be required to provide an onsite firefighting water supply (i.e., storage tanks) and subsequently, adequate access to that dedicated firefighting water supply would be required.

There may be some cases where non-reticulated lots are road fronting, and Fire and Emergency will be able to access onsite water supply for firefighting use from the road without the need to access the lot with a fire appliance. Where the onsite firefighting water supply is not accessible from the road, Fire and Emergency would need to access the site via the accessway with a fire (pumping) appliance.

3. Where located in an area with a fully reticulated water supply system (including hydrants) available.

Private Accessway:

1. serving 7- 30 units/lots (not vested), or

2. serving up to 6 that is over 50m in length, or

3. Where located in an area that does not have a fully reticulated water supply system (including hydrants) available.

Road Hierarchy	Minimum radius (m)
Private Accessway serving 7 – 30 units/lots (not vested) or serving up to 6 lots that is over 50m in length	~~6~~10m subject to vehicle tracking for anticipated design vehicle

or to similar effect.

And any consequential changes to give effect to the relief sought.

<table>
<tr><th>Provision</th><th>Submission</th><th>Relief sought</th></tr>
<tr><td></td><td>The current rule framework and Table DEV X Table 1.1 does not provide for or acknowledge these scenarios. This may restrict the ability for a fire appliance to access an onsite water supply and/or building and therefore presents a risk to Fire and Emergency operations given there is no apparent differentiation between reticulated vs. unreticulated scenarios.

Further, where a private accessway is serving up to 30 units / lots, a minimum radius of 10m would be required to enable an 8m medium rigid truck (pumping appliance) to turn in accordance with Waka Kotahi NZ Transport Agency on-road tracking curves. This requirement is set out in Table 2 of F5-02-GD-FFO emergency vehicle access guide.</td><td></td></tr>
<tr><td>Table DEV X Table 1.2 Required Tank Volumes for On-site Residential Water Supply</td><td>Oppose

As set out above, it is unclear whether these volumes account for firefighting water supply capacity. If it does, the table needs to specify how much water storage must be maintained at all times for firefighting water use and how this is to be determined.

This relief seeks alignment with the amendment sought to DEV X-O10 Infrastructure Servicing above.

<table>
<tr><th rowspan="2">Roof Catchment (m^2)</th><th colspan="5">Bedrooms</th></tr>
<tr><th>1</th><th>2</th><th>3</th><th>4</th><th>5</th></tr>
<tr><td>100</td><td>$20m^3$</td><td>$50m^3$</td><td></td><td></td><td></td></tr>
<tr><td>120</td><td>$15m^3$</td><td>$35m^3$</td><td></td><td></td><td></td></tr>
<tr><td>140</td><td>$10m^3$</td><td>$30m^3$</td><td>$75m^3$</td><td></td><td></td></tr>
<tr><td>160</td><td></td><td>$20m^3$</td><td>$60m^3$</td><td></td><td></td></tr>
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<tr><td>200</td><td></td><td></td><td>$45m^3$</td><td>$65m^3$</td><td></td></tr>
<tr><td>220</td><td></td><td></td><td>$35m^3$</td><td>$55m^3$</td><td>$90m^3$</td></tr>
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<tr><td>260</td><td></td><td></td><td>$30m^3$</td><td>$45m^3$</td><td>$70m^3$</td></tr>
<tr><td>280</td><td></td><td></td><td></td><td>$40m^3$</td><td>$65m^3$</td></tr>
<tr><td>300</td><td></td><td></td><td></td><td>$35m^3$</td><td>$60m^3$</td></tr>
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</td><td>Clarify intent and application of this table.</td></tr>
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