

Form 6

Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan

Clause 8 of Schedule 1, Resource Management Act 1991

To: **Porirua City Council**

Name of persons making a further submission	Fire and Emergency New Zealand (submitter 119)
Contact name if different from above	c/- Britta Blann, Planning Technician
Organisation or company (if relevant)	Beca Limited
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This is a further submission, both in support and in opposition to, submissions on the Proposed Porirua District Plan submitted by Fire and Emergency New Zealand (Fire and Emergency).

Interest in submissions

Fire and Emergency is a party with an interest in the Proposed Porirua District Plan that is greater than the interest of the general public, and also represents a relevant aspect of the public interest. This is because:

- The role of Fire and Emergency as prescribed in legislation includes promoting fire safety and fire prevention, and extinguishing fires. The Proposed Porirua District Plan provides an opportunity to better facilitate these activities, by including appropriate objectives, policies and rules to enable people and communities to provide for their social and economic wellbeing, and for their health and safety with regard to fire safety, fire prevention and fire extinction.
- It is essential that Fire and Emergency is able to meet its legal duty to provide an efficient and effective emergency service to all New Zealanders, so as to avoid, remedy or mitigate the adverse effects of fire and other emergencies (as required by the Fire and Emergency New Zealand Act 2017).

Fire and Emergency's further submission

Fire and Emergency's support of, or opposition to, a particular submission including the reasons for support or opposition and the relief sought are identified in the table included in Appendix A (attached).

Request to be heard in support of further submission

Fire and Emergency **does** wish to be heard in support of its further submission.

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



.....
(Signature of person authorised to sign
on behalf of Fire and Emergency New
Zealand)

11/05/2021

.....
Date

Appendix A - Further submission on behalf of Fire and Emergency New Zealand

The following matters in the table below are of relevance to Fire and Emergency New Zealand (Fire and Emergency). The **red** text reflects the amendments requested by the submission. The **orange** text reflects the amendments sought to the submissions by Fire and Emergency.

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
Royal Forest and Bird Protection Society (225.107)	<p>INF-P1</p> <p>The submitter seeks the amendments to INF-P1:</p> <p>Recognise the social, economic, environmental and cultural benefits of Regionally Significant Infrastructure, including:</p> <p>1. ...</p> <p>...</p> <p>4. Safe and efficient drinking water, wastewater and stormwater treatment systems, networks and services, which maintains public health and safety.</p>	Oppose	Fire and Emergency opposes this submission point as the proposed amendment would have the effect of excluding firefighting water supply from this policy.	Retain notified provision
Survey + Spatial New Zealand (Wellington Branch) (72.14)	<p>TR-S4</p> <p>The submitter seeks to delete standard TR-S4.</p>	Oppose	Fire and Emergency opposes this submission point to remove this standard. TR-S4 explicitly sets out requirements to ensure site access for fire appliances are adequately provided for. This is essential in ensuring the health, safety and wellbeing of people and the wider community.	Retain notified provision
Kāinga Ora –Homes and Communities (81.384)	<p>TR-S1</p> <p>The submitter seeks to amend standard TR-S1. Additionally, the submitter seeks consistency of access dimensions/requirements as set out in TR-S1 and TR-S4:</p>	Support in part and oppose in part	<p>Fire and Emergency supports this submission point in part as there should be consistency of access width requirements across TR-S1 and TR-S4.</p> <p>Fire and Emergency consider the minimum access width of 4m, as per TR-S4, more appropriate to provide for adequate access for fire appliances.</p>	<p>Retain notified provision subject to amendments as below:</p> <p>1. Access to a single site must have a direct legal road frontage</p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>1. Access to a single site must have a direct legal road frontage width of at least 1.8m.</p> <p>2. Access to two or more sites must have pedestrian and cycling access provided from legal road with a:</p> <ul style="list-style-type: none"> i. Minimum legal width of 1.8m; ii. Minimum formed width of 1.5m; iii. Maximum average gradient of 1:20; and iv. Maximum gradient of 1:13 for any length as long as it does not exceed 9m." 		<p>Fire and Emergency opposes that part of submission that seeks to remove maximum gradient standards. Maximum gradient standards are required to ensure access for fire appliances. These standards are set out in the New Zealand Fire Service Firefighting Water Supplies SNZ PAS 4509:2008 Code of Practice.</p>	<p>width of at least 1.8m <u>4m</u>.</p> <p>2. Access to two or more sites must have pedestrian and cycling access provided from legal road with a:</p> <ul style="list-style-type: none"> i. Minimum legal width of 1.8m <u>4m</u>; ii. Minimum formed width of 1.5m <u>4m</u>; iii. Maximum average gradient of 1:20; and iv. Maximum gradient of 1:13 for any length as long as it does not exceed 9m.
<p>Kāinga Ora – Homes and Communities (81.385)</p>	<p>TR-S2</p> <p>The submitter seeks to delete standard TR-S2.</p>	<p>Oppose</p>	<p>Fire and Emergency opposes this submission point as TR-S2 requires vehicle access to be classified according to TR-Table 1. Vehicle access classifications are necessary to provide for adequate access for fire appliances.</p>	<p>Retain notified provision</p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
Kāinga Ora – Homes and Communities (81.386)	TR-Table 1 The submitter seeks to delete standard TR-Table 1.	Oppose	Fire and Emergency opposes this submission point to delete standard TR-Table 1 as this standard stipulates vehicle access categorises based on the number of residential sites the vehicle access provides for. This is critical to ensure adequate access for fire appliances is provided for appropriately, particularly regarding adjoining allotments.	Retain notified provision
Kāinga Ora – Homes and Communities (81.387)	TR-S3 The submitter seeks an entire review of standard TR-S3: <ul style="list-style-type: none"> • <i>Kāinga Ora seek changes to the required accessway widths (TR-Table 2) and/or number of sites/units serviced off such accessways (TR-Table 1).</i> • <i>Kāinga Ora considers that the standards as drafted are over engineered for residential scale development.</i> • <i>Kāinga Ora also seeks the introduction of notification preclusion statement (for both public and limited notification) at rule TR-R2 for any non-compliance with this standard.</i> • <i>Kāinga Ora seeks the review of this standard and consequential amendment</i> 	Oppose	Fire and Emergency opposes this submission point to review TR-S3 as this standard requires vehicle access to comply with TR-Table 2. TR-Table 2 sets out vehicle access design standards for each vehicle access classification. Standards include required access widths and gradients which Fire and Emergency considers critical to ensure adequate access for fire appliances is provided for.	Retain notified provision

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
Kenepuru Limited Partnership (KLP) (59.21)	<p>TR-Table 2</p> <p>The submitter seeks to amend standard TR-12:</p> <ul style="list-style-type: none"> • <i>Use NZS 4404:2010 as the basis for vehicle access design.</i> • <i>Remove distinction between private and public roads for design purposes.</i> • <i>Include all roads in one design Standard and refer to that table from both INF and TR sections of the Plan</i> 	Oppose	Fire and Emergency opposes this submission point to amend TR-Table 2 as this table sets out vehicle access design standards for each vehicle access classification. Standards include minimum access widths and maximum gradients which Fire and Emergency considers most appropriate as notified, and critical to ensure adequate access for fire appliances is provided for.	Retain notified provision
Kāinga Ora – Homes and Communities (81.388)	<p>TR- Table 2</p> <p>The submitter seeks to delete standard TR-Table 2.</p>	Oppose	Fire and Emergency opposes this submission point to delete TR-Table 2 as this table sets out vehicle access design standards for each vehicle access classification. Standards include minimum access widths and maximum gradients which Fire and Emergency consider most appropriate as notified, and critical to ensure adequate access for fire appliances is provided for.	Retain notified provision
Kāinga Ora – Homes and Communities (81.390)	<p>TR-S4</p> <p>The submitter seeks to amend standard TR-S4:</p> <p>Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 75m when connected to a road that has a fully reticulated water supply system including hydrants, must:</p>	Oppose	Fire and Emergency opposes this submission point to amend TR-S4 as this standard requires sites, with no access to, or 75m from, a reticulated water supply system, must comply with vehicle access design standards in TR-Table 2. TR-Table 2 sets out vehicle access design standards which include minimum access widths and maximum gradients which Fire and Emergency considers critical to ensure adequate access for fire appliances is provided for.	<p>Accept Fire and Emergency's original submission point (119.26) against notified provision as below:</p> <p>..</p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>a) Be designed to achieve the vehicle access design standards in TR Table 2 for:</p> <p>i) The relevant vehicle access classification level in accordance with TR-S2 for activities with vehicle parking or loading spaces provided on-site; or</p> <p>ii) Vehicle Access Level 1 for any other activities; and</p> <p>b) Have a minimum formed width of 3.5m;</p>			<p>b. Have a minimum formed width of 3.5m <u>4m</u>;</p> <p>..</p>
<p>Porirua City Council (11.34)</p>	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>..</p> <p>Subject to NH-P8, Avoid the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless it can be demonstrated that:</p> <p>1. The activity has a critical operational need and functional need to locate within the High Hazard Area and locating outside the High Hazard Area is not a practicable option;</p> <p>1. <u>There will be a reduction in risk to people's lives and wellbeing;</u></p> <p>2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing;</p>	<p>Oppose</p>	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>However, Fire and Emergency opposes the suggested removal of NH-P2(1) which appropriately recognises that there may be an operational and functional need for hazard sensitive activities (e.g. fire stations) to locate in High Hazard Areas in some instances.</p>	<p>Retain notified provision</p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>and minimise the risk of damage to buildings damage is avoided;</p> <p>3. ...</p> <p>4. ...</p> <p>5. <u>Other than within Commercial and Mixed Use Zones, the General Industrial Zone and the Hospital Zone, the activity has an operational need and functional need to locate within the High Hazard Area and locating outside the High Hazard Area is not a practicable option.</u></p>			
Foodstuffs North Island Limited (122.5)	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>..</p> <p><u>Avoid Discourage</u> the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless it can be demonstrated that:</p> <p>..</p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports this submission point. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at times to add to existing or locate new fire stations to High Hazard Areas. There may be a functional need to be located in High Hazard Areas to maintain emergency response times.</p>	<p>Retain notified provision subject to amendments sought by this submission point and in conjunction with relief sought in submission point (11.34).</p> <p>Relief sought as worded below:</p> <p>..</p> <p><u>Avoid Discourage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive..</u></p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
Light House Cinema Limited (199.2)	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>Avoid Manage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless where it can be demonstrated that:</p> <p>1. ...</p> <p>1. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing; and building damage is avoided or mitigated;</p> <p>2. ..</p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. There may be a functional need to be located in High Hazard Areas to maintain emergency response times and</p>	<p>Retain notified provision subject to amendments sought by similar submission point (122.5) and in conjunction with relief sought in submission point (11.34).</p> <p>Relief sought as worded below:</p> <p>..</p> <p>Avoid Discourage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive..</p>
Anita and Fraser Press (253.7)	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>Avoid Manage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless where it can be demonstrated that:</p> <p>1. ..</p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. There may be a functional need to be located in High Hazard Areas to maintain emergency response times.</p>	<p>Retain notified provision subject to amendments sought by similar submission point (122.5) and in conjunction with relief sought in submission point (11.34).</p> <p>Relief sought as worded below:</p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing; and building damage is avoided or mitigated;</p> <p>3. ..</p>			<p>..</p> <p>Avoid Discourage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive....</p>
James McLaughlan (237.8)	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>Avoid Manage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless where it can be demonstrated that:</p> <p>1. ..</p> <p>2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing; and building damage is avoided or mitigated;</p> <p>3. ..</p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. There may be a functional need to be located in High Hazard Areas to maintain emergency response times.</p>	<p>Retain notified provision subject to amendments sought by similar submission point (122.5) and in conjunction with relief sought in submission point (11.34).</p> <p>Relief sought as worded below:</p> <p>..</p> <p>Avoid Discourage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive...</p>
Graham and Janet Reidy (234.7)	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>NH-P2</p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports this submission point in part. Emergency services are identified</p>	<p>Retain notified provision subject to amendments sought by similar submission point (122.5) and in conjunction with relief</p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>Avoid Manage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless where it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. .. 2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing; and building damage is avoided or mitigated; 3. .. 		<p>as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. There may be a functional need to be located in High Hazard Areas to maintain emergency response times.</p>	<p>sought in submission point (11.34).</p> <p>Relief sought as worded below:</p> <p>..</p> <p>Avoid Discourage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities...</p>
<p>Quest Projects Limited (233.7)</p>	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>Avoid Manage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless where it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. .. 2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing; and building damage is avoided or mitigated; 3. .. 	<p>Support in part</p>	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. There may be a functional need to be located in High Hazard Areas to maintain emergency response times.</p>	<p>Retain notified provision subject to amendments sought by similar submission point (122.5) and in conjunction with relief sought in submission point (11.34).</p> <p>Relief sought as worded below:</p> <p>..</p> <p>Avoid Discourage the establishment of Hazard-Sensitive Activities and</p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
Jason Alder (232.5)	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>Avoid Manage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless where it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. .. 2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing; and building damage is avoided or mitigated; 3. .. 	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. There may be a functional need to be located in High Hazard Areas to maintain emergency response times.</p>	<p>Potentially-Hazard-Sensitive Activities...</p> <p>Retain notified provision subject to amendments sought by similar submission point (122.5) and in conjunction with relief sought in submission point (11.34).</p> <p>Relief sought as worded below:</p> <p>..</p> <p>Avoid Discourage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive...</p>
Carolyn Vasta and Carole Reus (230.6)	<p>NH-P2</p> <p>The submitter seeks to amend policy NH-P2:</p> <p>Avoid Manage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless where it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. .. 	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. There may be a functional need</p>	<p>Retain notified provision subject to amendments sought by similar submission point (122.5) and in conjunction with relief sought in submission point (11.34).</p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing; and building damage is avoided or mitigated;</p> <p>3. ..</p>		to be located in High Hazard Areas to maintain emergency response times.	<p>Relief sought as worded below:</p> <p>..</p> <p><u>Avoid Discourage the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive...</u></p>
Kāinga Ora – Homes and Communities (81.423)	<p>NH-R8</p> <p>The submitter seeks to amend rule NH-R8:</p> <p>NH-R8 Any Hazard-Sensitive Activity and Potentially-Hazard-Sensitive Activity and associated buildings within the High Hazard Areas in a Natural Hazard Overlay</p> <p>City Centre Zone</p> <p>1. Activity status: Non-complying Discretionary</p> <p>All zones except the City Centre Zone</p> <p>2. Activity status: Non-complying</p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports this submission point. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to maintain emergency response times.</p>	<p>Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point:</p> <p>Amend rule as follows:</p> <p>1. Activity status: Non-complying-Restricted Discretionary</p> <p><u>With matters of discretion linked to those set out in NH-P2</u></p>
TJL Associates (56.1)	NH-R8	Support in part	Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.	Accept Fire and Emergency's submission point

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>The submitter seeks to amend rule NH-R8:</p> <p><i>Amend to provide an appropriate consenting pathway, that seeks to reduce the risk of hazards instead of avoiding it altogether.</i></p>		<p>Fire and Emergency supports this submission point. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional requirement for fire stations to be located in High Hazard Areas to maintain emergency response times.</p>	<p>(119.37) against notified provision as aligned with this submission point:</p> <p>Amend rule as follows:</p> <p>1. Activity status: Non-complying-Restricted <u>Discretionary</u></p> <p><u>With matters of discretion linked to those set out in NH-P2</u></p>
Woolworths New Zealand Limited (120.3)	<p>NH-R8</p> <p>The submitter seeks to amend rule NH-R8:</p> <p>Amend the rule to:</p> <ul style="list-style-type: none"> • <i>Remove the requirement for Potentially Hazard Sensitive Activities to obtain resource consent as a Non-Complying Activity; and</i> • <i>Require Potentially Hazard Sensitive Activities to obtain resource consent as a Restricted Discretionary Activity.</i> 	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to improve emergency response times.</p>	<p>Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point:</p> <p>Amend rule as follows:</p> <p>1. Activity status: Non-complying-Restricted <u>Discretionary</u> <u>With matters of discretion linked to those set out in NH-P2</u></p>
Light House Cinema	NH-R8	Support in part	Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.	Accept Fire and Emergency's submission point

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Limited (199.3)	<p>The submitter seeks to amend rule NH-R8:</p> <p>NH-R8.1 Activity Status: Non-complying.</p> <p><u>Replace NH-R8 with a new restricted discretionary rule.</u></p>		<p>Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to improve emergency response times.</p>	<p>(119.37) against notified provision as aligned with this submission point:</p> <p>Amend rule as follows:</p> <p>1. Activity status: Non-complying <u>Restricted Discretionary</u></p> <p><u>With matters of discretion linked to those set out in NH-P2</u></p>
Thomas Charles and Claire Louise Clark (153.10)	<p>NH-R8</p> <p>The submitter seeks to amend rule NH-R8:</p> <p><i>Flood hazard rules are not the most appropriate way to give effect to the Resource Management Act; and that activities within the Stream Corridor should not be "non-complying" as there are various mitigation methods that can be used.</i></p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to improve emergency response times.</p>	<p>Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point:</p> <p>Amend rule as follows:</p> <p>1. Activity status: Non-complying <u>Restricted Discretionary</u></p> <p><u>With matters of discretion linked to those set out in NH-P2</u></p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
Carolyn Vasta and Carole Reus (230.7)	NH-R8 The submitter seeks to amend rule NH-R8: NH-R8.1 Activity Status: Non-complying. <u>Replace NH-R8 with a new restricted discretionary rule.</u>	Support in part	Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards. Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to improve emergency response times.	Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point: Amend rule as follows: 1. Activity status: Non-complying <u>Restricted Discretionary</u> <u>With matters of discretion linked to those set out in NH-P2</u>
Jason Alder (232.6)	NH-R8 The submitter seeks to amend rule NH-R8: NH-R8.1 Activity Status: Non-complying. <u>Replace NH-R8 with a new restricted discretionary rule.</u>	Support in part	Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards. Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to improve emergency response times.	Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point: Amend rule as follows: 1. Activity status: Non-complying <u>Restricted Discretionary</u> <u>With matters of discretion linked to those set out in NH-P2</u>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
Quest Projects Limited (233.8)	<p>NH-R8</p> <p>The submitter seeks to amend rule NH-R8:</p> <p>NH-R8.1 Activity Status: Non-complying.</p> <p><u>Replace NH-R8 with a new restricted discretionary rule.</u></p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to improve emergency response times.</p>	<p>Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point:</p> <p>Amend rule as follows:</p> <p>1. Activity status: Non-complying <u>Restricted Discretionary</u></p> <p><u>With matters of discretion linked to those set out in NH-P2</u></p>
Graham and Janet Reidy (234.8)	<p>NH-R8</p> <p>The submitter seeks to amend rule NH-R8:</p> <p>NH-R8.1 Activity Status: Non-complying.</p> <p><u>Replace NH-R8 with a new restricted discretionary rule.</u></p>	Support in part	<p>Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards.</p> <p>Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to improve emergency response times.</p>	<p>Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point:</p> <p>Amend rule as follows:</p> <p>1. Activity status: Non-complying <u>Restricted Discretionary</u></p>

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
				With matters of discretion linked to those set out in NH-P2
James McLaughlan (237.9)	NH-R8 The submitter seeks to amend rule NH-R8: NH-R8.1 Activity Status: Non-complying. <u>Replace NH-R8 with a new restricted discretionary rule.</u>	Support	Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards. Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to be located in High Hazard Areas to improve emergency response times.	Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point: Amend rule as follows: 1. Activity status: Non-complying <u>Restricted Discretionary</u> With matters of discretion linked to those set out in NH-P2
Anita and Fraser Press (253.8)	NH-R8 The submitter seeks to amend rule NH-R8: NH-R8.1 Activity Status: Non-complying. <u>Replace NH-R8 with a new restricted discretionary rule.</u>	Support in part	Fire and Emergency supports a reduction in the risk to people and property posed by natural hazards. Fire and Emergency supports in this submission point in part. Emergency services are identified as hazard-sensitive activities within the PPDP. There may be a requirement at any time to add to existing or locate new fire stations to High Hazard Areas. Plimmerton Fire Station is currently located within a High Hazard Area in a Natural Hazard Overlay. There may be a functional for fire stations to	Accept Fire and Emergency's submission point (119.37) against notified provision as aligned with this submission point: Amend rule as follows:

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
			be located in High Hazard Areas to improve emergency response times.	1. Activity status: Non-complying-Restricted <u>Discretionary</u> <u>With matters of discretion linked to those set out in NH-P2</u>
Frances McNamara (259.3)	ECO-R1 The submitter seeks to amend rule ECO-R1: <i>The setback should be able to be extended to 10m (and further in certain circumstances), based on fire safety.</i>	Support in part	Fire and Emergency supports this submission point in part. ECO-R1 sets out criteria to permit the trimming or removal of indigenous vegetation. As set out in Fire and Emergency guidance, certain native vegetation with high flammability increases the risk of fire spread where located within 10m of a structure. ¹ However, lower flammability species can safely be planted closer to structures.	As sought by submitter.
Gail Mosey (260.1)	ECO-R1 The submitter seeks an entire review of rule ECO-R1: <i>Suggested provisions more in line with provisions applied by KCDC:</i> <i>Most of the other provisions should then be unnecessary, as the activity would then be permitted. If other clauses are retained, then clauses should be</i>	Support in part	Fire and Emergency supports this submission point in part. ECO-R1 sets out criteria to permit the trimming or removal of indigenous vegetation. As set out in Fire and Emergency guidance, certain native vegetation with high flammability increases risk of fire spread where located within 10m of a structure. However, lower flammability species can safely be planted closer to structures.	As sought by submitter.

¹ Fire and Emergency NZ (2021) Landscaping for fire safety [online] available at: <https://www.fireandemergency.nz/farms-rural-properties-and-rural-businesses/landscaping-fire-safety/> (Accessed May 2021).

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p><i>added to permit the removal of indigenous vegetation to:</i></p> <ul style="list-style-type: none"> • <u>Clear a zone of 10m around a dwelling, as recommended by the New Zealand Fire Service</u> • .. 			
Andrea & Karl Simonlehner (110.3)	<p>ECO-R1</p> <p>The submitter seeks an amendment to rule ECO-R1:</p> <p><i>A setback of 10 - 20 meters would allow for better management in case of a bush fire.</i></p>	Support in part	Fire and Emergency supports this submission point in part. ECO-R1 sets out criteria to permit the trimming or removal of indigenous vegetation. As set out in Fire and Emergency guidance, certain native vegetation with high flammability increases risk of fire spread where located within 10m of a structure. However, lower flammability species can safely be planted closer to structures.	As sought by submitter.
Ryan Family Trust (138.4)	<p>ECO-R1</p> <p>The submitter seeks an amendment to rule ECO-R1:</p> <p><i>The rules must be modified to allow adequate tree trimming beyond the 3m dimension at the discretion of the owner.</i></p>	Support in part	Fire and Emergency supports this submission point in part. ECO-R1 sets out criteria to permit the trimming or removal of indigenous vegetation. As set out in Fire and Emergency guidance, certain native vegetation with high flammability increases risk of fire spread where located within 10m of a structure. However, lower flammability species can safely be planted closer to structures.	As sought by submitter.
Michael Wood (25.2)	<p>ECO-R1</p> <p>The submitter seeks an amendment to rule ECO-R1:</p> <p><i>The permitted distance from a building to remove indigenous vegetation should remain at the very least at 4m. The wording should make it clear that the</i></p>	Support in part	Fire and Emergency supports this submission point in part. ECO-R1 sets out criteria to permit the trimming or removal of indigenous vegetation. As set out in Fire and Emergency guidance, certain native vegetation with high flammability increases risk of fire spread where located within 10m of a structure. However,	As sought by submitter.

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<i>distance specified refers to the distance including any overhanging branches or canopy.</i>		lower flammability species can safely be planted closer to structures.	
Kāinga Ora – Homes and Communities (81.444)	SUB-P5 The submitter seeks an amendment to policy SUB-P5: Require infrastructure to be provided in an integrated and comprehensive manner by: <ol style="list-style-type: none"> 1. .. 2. .. 3. Requiring reticulated wastewater, reticulated water and stormwater management systems in Urban Zones to meet the performance criteria of the Wellington Water's Regional Water Standard May 2019; 4. .. 	Oppose	Fire and Emergency opposes this submission point to remove the requirement to comply with performance criteria in the Wellington Water's Regional Water Standard May 2019. This would remove the assurance that firefighting water supply will be adequately provided for as required under Wellington Water's Regional Water Standard May 2019.	Retain notified provision
Survey + Spatial New Zealand (Wellington Branch) (72.13)	SUB-P5 The submitter seeks an amendment to policy SUB-P5: Require infrastructure to be provided in an integrated and comprehensive manner by: <ol style="list-style-type: none"> 1. Ensuring infrastructure meets Council standards and has the capacity to accommodate the development or anticipated future development in accordance with the purpose of the zone, and is in place at the time of allotment creation; 	Oppose	Fire and Emergency opposes this submission point to remove the requirement to comply with Council standards and performance criteria in the Wellington Water's Regional Water Standard May 2019. This would remove assurance that adequate firefighting water supply will be provided for as required under Wellington Water's Regional Water Standard May 2019.	Retain notified provision

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>2. ..</p> <p>3. Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to meet the performance criteria of to be assessed against the Wellington Water's Regional Water Standard May 2019;</p> <p>4. ..</p>			
Survey + Spatial New Zealand (Wellington Branch) (72.33)	<p>SUB-S2</p> <p>The submitter seeks amendment to standard SUB-S2:</p> <p><i>Delete reference to standards TR-S3.</i></p> <p><i>Standard TR-S4 only to apply as/if relevant.</i></p>	Oppose	Fire and Emergency opposes this submission point to remove the requirement to comply with standards TR-S3 and TR-S4 as this will remove assurance that all subdivisions will provide adequate access for fire appliances. Standard TR-S4 is directly intended to provide for fire appliances which Fire and Emergency consider critical in ensuring the health, safety and wellbeing of people and the wider community.	Retain notified provision
Kāinga Ora – Homes and Communities (81.472)	<p>SUB-S3</p> <p>The submitter seeks to delete standard SUB-S3:</p> <p><i>Deletion of the SUB-S3 as notified in the PDP is sought, with amendments being made to give effect to consequential changes resulting from the submission point(s) made by Kāinga Ora on the INF and TR chapters of the PDP.</i></p> <p><i>Delete:</i></p>	Oppose	Fire and Emergency opposes this submission to remove standard SUB-S3 as this will remove the requirement for subdivisions to provide for road connections that comply with appropriate vehicle access requirements, as classified in accordance with TR-S4. Adequate access at road connections is critical to ensure fire appliances can safely access the source of fires.	Retain notified provision

Submitter (and submission number)	The particular submission point(s) Fire and Emergency supports or opposes	Fire and Emergency position	Reasons for support or opposition	Relief sought
	<p>1. All new roads and connections to roads must comply with INF-R23-1.a and INF-R23-1.b.</p> <p>2. Matters of discretion are restricted to: 1. The matters in INF-P14.</p>			