

Further Sub No. 2948

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**From:** James Taylor-Cyphers [james.taylor-cyphers@beca.com]  
**Sent:** Monday, 28 May 2007 15:11  
**To:** hgiplan  
**Subject:** Further Submission to HGI Plan Change: New Zealand Fire Service  
**Attachments:** New Zealand Fire Service Further Submission.pdf

Hi there!  
Must be a busy day for whoever is on the end of this inbox...

Please accept the attached further submission on the HGI Plan Change.

Many Thanks,

**James Taylor-Cyphers**

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<<New Zealand Fire Service Further Submission.pdf>>

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FORM 6

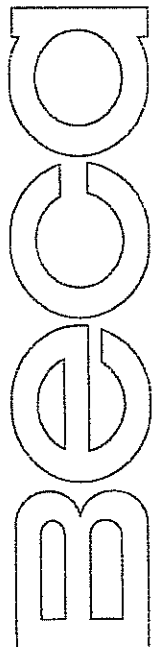
**FURTHER SUBMISSION IN SUPPORT AND OPPOSITION TO  
SUBMISSIONS ON A PUBLICLY NOTIFIED PROPOSED PLAN  
UNDER CLAUSE 8 OF THE FIRST SCHEDULE, RESOURCE  
MANAGEMENT ACT 1991**

To: Auckland City Council  
Submission on: Hauraki Gulf Islands District Plan Review 2006  
Name of submitter: New Zealand Fire Service Commission (The Commission)  
Address: C/- Beca Carter Hollings and Ferner Ltd  
PO Box 6345  
AUCKLAND

This is a further submission to the Hauraki Gulf Islands District Plan Review 2006. The Hauraki Gulf Islands includes more than 65 Islands with the largest being Great Barrier and Waiheke, both containing a number of communities. The Gulf Islands contain "inner islands" and "outer islands" as described within the proposed District Plan Review.

The Commission has assessed the submissions to the District Plan Review and has prepared a further submission in support and opposition to those submissions considered relevant to its operational requirements. The Commission's further submission is attached in table form as part of this document.

The Commission wish to be heard in support of their submission.



FEBURGUT

(Signature of person authorised  
to sign on behalf of New Zealand  
Fire Service)

28 May 2007

Date

**Title and address for service of person  
making submission:**

**New Zealand Fire Service Commission  
c/o Beca Carter Hollings & Ferner Ltd**

**Attention: Fiona Blight**

**Address: Beca Carter Hollings & Ferner Ltd  
PO Box 6345  
AUCKLAND**

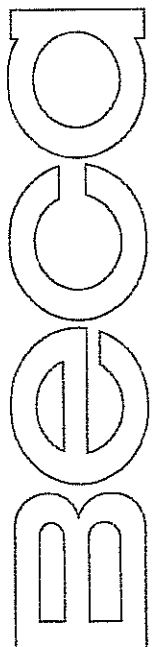


Table 1

## Hauraki Gulf Islands District Plan Review - New Zealand Fire Service Commission Further Submission

Submitter	Submission Number	Plan Reference	Support or Oppose	Reasons for support or opposition
Rural Fire Authority	1467/2	General	Support	Fire risk is significant in isolated rural communities.
Auckland Regional Council	3521/156	10c	Support in part	As a base level, fire fighting water supply in rural areas should meet the alternative water supply provisions of the NZFS Water Suppliers Code of Practice NZS 2003:4509 (the NZFS considers that the best way for this to be achieved is through sprinkler systems). Additional water supply based on number of rooms for other potable use may be appropriate in addition to this standard.
Waihangā Kainga Trust	358/7 and 2552/7	10c.3.1	Support in part	The requirement for landscaping should not increase fire risk to habitable buildings from fire leaping from adjoining vegetation, scrubland or forest or vice versa. Landscaping should provide for a clear defensible space of between 10-30m depending on site characteristics such as slope and consider the flammability and intensity of plant species within up to 90m of the dwelling. Landscaping should be undertaken in accordance with the National Rural Fire Authorities publication <i>FireSmart: Partners in Protection: Protecting Our Communities from Interface Fires 2004</i> , which provides guidelines for defensible spaces and appropriate low flammability classed native plants.
Park Point Vineyards Limited	2107/1	10c.4.7	Support in part	
Tony and Sandra Pope	3528/1	10c.4.7	Support in part	
Christopher J Thompson	1409/3	10c.5	Support	Landscaping near habitable dwellings should have regard to the National Rural Fire Authorities publication <i>FireSmart: Partners in Protection: Protecting Our Communities from Interface Fires 2004</i> and utilise plant species with a low flammability classification.
Neil Wright	464/1	10c.5	Support in part	Every dwelling should have the ability to establish a defensible space, clear of potential fire hazards, of between 10-30m depending on site characteristics. Additionally, vegetation within up to 90m of a habitable dwelling should be able to be modified in accordance with the National Rural Fire Authorities publication <i>FireSmart: Partners in Protection: Protecting Our Communities from Interface Fires 2004</i> , which provides guidelines for defensible spaces and appropriate low flammability classed native plants.
Carole Wright	465/1	10c.5	Support in part	
Walter Glass	943/4	10c.5	Support in part	
Christopher J Thompson	1409/1	10c.5	Support	
Rural Fire Authority	1467/1	10c.5	Support	
John R Mellars	1406/17	10c.5	Support in part	
Ross D MacKae	2759/2	10c.5	Support in part	

Submitter	Submission Number	Plan Reference	Support or Oppose	Reasons for Support or Opposition
Ross D MacRae	2759/4	10c.5	Support in part	
John H and Shirley R Gray	3422/6	10c.5	Support	
Ross D MacRae	3728/6	10c.5	Support in Part	
	129/1, 130/1, 132/1, 172/1, 237/1, 241/1, 242/1, 243/1, 244/1, 270/1, 271/1, 272/1, 274/1, 275/1, 3425/1, 3426/1, 3427/1, 3428/1, 3429/1, 3430/1, 3431/1, 3432/1, 3433/1, 3434/1, 3435/1, 3436/1, 3437/1, 3438/1, 3439/1, 3440/1, 3441/1, 3442/1, 3443/1, 3444/1, 3445/1, 3446/1, 3447/1, 3448/1, 3449/1, 3450/1, 3451/1, 3452/1, 3453/1, 3454/1, 3455/1, 3455/1, 3456/1, 3457/1, 3458/1, 3459/1, 3460/1, 3461/1, 3462/1, 3463/1, 3464/1, 3465/1, 3466/1, 3467/1, 3468/1, 3469/1, 3470/1, 3471/1, 3472/1, 3473/1, 3474/1, 3475/1, 3476/1, 3477/1, 3478/1, 3480/1, 3481/1, 3482/1, 3483/1, 3484/1, 3485/1, 3486/1, 3487/1, 3488/1, 3489/1, 3490/1, 3491/1, 3492/1, 3493/1, 3494/1, 3495/1, 3496/1, 3496/1, 3497/1, 3498/1, 3499/1, 3500/1, 3502/1, 3503/1, 3804/1, 3505/1, 3506/1, 3507/1, 3507/2, 3511/1, 3581/1, 3851/1, 3852/1, 3857/1	10c.5	Support in part	
Brett Cran, Alistair Cran and Margaret Cran	2729/3, 2730/3	10c.5	Support	
John H and Shirley R Gray	3422/7	10c.5	Support in Part	
	618/44, 619/10,	4.8.2	Support in Part	Fire fighting water supply should be considered in any local integrated water

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	754/11, 859/11, 1101/90, 1286/50, 1287/115, 1288/38, 1289/99, 2670/10, 2878/51			management system and should comply with the minimum standards as set out in the NZFS Water Suppliers Code of Practice NZS 2003:4509.
Claire Mortimer	1166/19	5	Support in Part	As detailed in the Original New Zealand Fire Service Submission, Emergency Service Facilities (fire, ambulance, police stations etc) should be provided for as permitted activities. Every dwelling should have the ability to establish a defensible space, clear of potential fire hazards of between 10-30m depending on site characteristics and to modify the vegetation within up to 90m of a habitable dwelling in accordance with the National Rural Fire Authorities publication <i>FireSmart: Partners in Protection: Protecting Our Communities from Interface Fires 2004</i> , which provides guidelines for defensible spaces and appropriate low flammability classed native plants.
	1584/1, 1588/1, 2146/1, 2152/1, 2177/1, 2214/1, 2216/1	10a	Support in Part	
Minister of Police	1072/1	11.3.2	Support in Part	Provision for the operations of Emergency Service providers such as the NZFS often relate to ensuring sufficient access is provided to a building and that the building has appropriate access to sufficient infrastructure to support the emergency service provider. The assessment criterion in Part 11.3.2 require an assessment against access and the provision of infrastructure. While the access provisions appear sufficient, other essential infrastructure such as fire fighting water supply is not specifically addressed. It is therefore acknowledged that an assessment of a proposal against these criteria may result in a less than desirable level of infrastructure provision for emergency service providers, such as fire fighting water supply for the NZFS. The NZFS therefore recommends an additional assessment criteria relating to the provision of infrastructure for emergency service providers be included. Reference should be made to the NZFS Water Suppliers Code of Practice NZS 2003:4509.
	618/90, 619/35, 754/40, 859/40, 1288/90, 2670/34	12.11.8	Oppose	The purpose of the Resource Management Act 1991 (the Act or RMA) is to promote the sustainable management of natural and physical resources, where sustainable management means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety.

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Rural Fire Authority	1467 / 3	13.6.1	Support	<p>The provision of adequate water supply (especially in areas served by Rural Fire Authorities) and access in terms of the operational needs of fire appliances are considered to be important in assisting the achievement of the purpose of the RMA.</p> <p>In addition, the RMA does not classify the Commission as a Requiring Authority. It is therefore important for the district plan to provide for the establishment of Fire Stations and other emergency service facilities throughout the district.</p> <p>Development in isolated locations, such as in the Gulf Islands, should recognise the importance of essential services, such as emergency services, to the safety and well being of the community. This means that new development should have a water supply that complies with the standards in the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2003 (Water Suppliers Code of Practice). The Water Suppliers Code of practice provides a number of options for adequate water supply and details a number of minimum standards for different situations including:</p> <ul style="list-style-type: none"> <li>• Fire fighting water storage requirements;</li> <li>• Standards regarding accessibility to fire fighting water; and</li> <li>• Standards regarding the location of the fire fighting water in relation to the fire hazard (building or vegetation etc).</li> </ul> <p>Water supply on the islands is generally by tank storage, which is often unreliable as a fire fighting water supply unless it has been specifically designed for this purpose. In areas reliant on tank water supply the Commission has identified that home fire sprinklers installed to NZS 4517:2002 are the best way of meeting the Water Supplies Code of Practice, as they require less tank storage (11,000 litres as opposed to 45,000 litres without sprinklers), and assist in dousing a fire within the first 30 minutes of a blaze.</p> <p>Given the remoteness of the islands and their predominantly rural environment, response times in an emergency situation for fire fighting appliances is likely to be extended from those in an urban area. On average a "normal size" residential dwelling will burn to the ground within 30 minutes. It is therefore important to the Commission that adequate water supply for fire-fighting purposes is provided within an accessible environment, a safe distance from habitable buildings. It is also important to the Commission that adequate access for fire fighting appliances is provided to sites to ensure no further impediment to emergency response times.</p> <p>Every dwelling should have the ability to establish a defensible space, clear of potential</p>

Submitter	Submission Number	Plan Reference	Support or Oppose	Reasons for support or opposition
				<p>fire hazards of between 10-30m depending on site characteristics and to modify the vegetation within up to 90m of a habitable dwelling in accordance with the National Rural Fire Authorities publication <i>FireSmart: Partners in Protection: Protecting Our Communities from Interface Fires 2004</i>, which provides guidelines for defensible spaces and appropriate low flammability classed native plants.</p> <p>New development should have a water supply that complies with the standards in the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2003.</p> <p>Water supply on the islands is generally by tank storage, which is often unreliable as a fire fighting water supply unless it has been specifically designed for this purpose.</p>
Minister of Police	1074/1	14.3	Support	<p>"Fire Stations" or facilities used to store fire fighting appliances and equipment in the Rural Fire Authority area are not specifically covered as a definition within the District Plan Review. The Commission does not consider that its activities fall under any other definition provided. Given the unique nature of the Commissions work it is considered that a definition for emergency services facilities should be included in the plan.</p>
Minister of Police	1074/2	10	Support	<p>"Emergency Service Facilities" are not specifically covered as an activity within any activity tables in the District Plan Review. It is important that the existing and future activities of emergency service providers can be undertaken as permitted activities in appropriate land units and settlement areas. This will assist emergency service providers to provide for the current and future health and safety needs of the community.</p>