Submission on publicly notified Proposed (Private) Plan Change 15 to the Hamilton District Plan

Form 5

Clause 6 of the First Schedule to the Resource Management Act 1991

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This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) on Proposed (Private) Plan Change 15 – Tuumata (PPC15).

- Fire and Emergency could not gain an advantage in trade competition through this submission.
- Fire and Emergency is directly affected by an effect that adversely affects the environment.
- Fire and Emergency do wish to be heard in support of its submission.
- Fire and Emergency oppose the private plan change request for reasons set out in the sections below, unless a satisfactory framework of provisions requiring firefighting water supply and emergency service access are incorporated into PPC15.

Fire and Emergency's submission is:

1.1 Context

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency seek 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)(b)

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

Fire and Emergency also has secondary functions to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform their main functions efficiently and effectively. These secondary functions[3] are:

(a) responding to medical emergencies; and
(b) responding to maritime incidents; and
(c) performing rescues, including high angle line rescues, rescues from collapsed buildings, rescues from confined spaces, rescues from unrespirable and explosive atmospheres, swift water rescues, and animal rescues; and
(d) providing assistance at transport accidents (for example, crash scene cordoning and traffic control); and
(e) responding to severe weather-related events, natural hazard events, and disasters; and
(f) responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment; and
(g) promoting safe handling, labelling, signage, storage, and transportation of hazardous substances; and
(h) responding to any other situation, if Fire and Emergency has the capability to assist; and
(i) any other function conferred on Fire and Emergency as an additional function by the Minister in accordance with section 112 of the Crown Entities Act 2004.

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

Fire and Emergency attend on average, 2250 incidents across Hamilton city annually. This includes an average[5] of:

- 559 fires
- 305 medical emergencies
- 163 vehicle accidents
- 138 rescues and public assists
- 1,085 'other'[6] emergencies.

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 which Fire and Emergency operate in more complex and puts greater demands on Fire and Emergency as an organisation.

Hamilton City Council (HCC) have a role in ensuring that Fire and Emergency, as an emergency service provider, can continue to operate effectively and efficiently in a changing urban environment. This includes ensuring emergency service vehicles and Fire and Emergency personnel can adequately access both built and natural environments across the district in the event of an emergency, and ensuring new development is adequately serviced by firefighting water supply.

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[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 call-outs, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea. In 2016/17, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined. (Source: NZ Fire Service Annual Report 2016/17)

[5] Average 2017-2021.Fire and Emergency note that the impact of COVI-19 on the number of incidents over the 2020/2021 period. In some urban environments, Fire and Emergency observed a reduction in fires and traffic accidents over this period. It is suspected this may have been due to people being home more during the pandemic and perhaps making them more vigilant around fires and reduction of unwanted fire, and fewer people in the public domain thereby reducing the likelihood of unwanted fires at beaches and parks.

[6] 'Other' emergencies include HAZMA, heat, pressure, and electrical call outs, false alarms, and other miscellaneous emergencies.

PPC15 seeks to re-zone 68 hectares of land within the Ruakura Structure Plan area, introducing a new Ruakura Tuumata Structure Plan to provide for up to 1,200 new residential homes for some 3000 people, a new Tuumata neighbourhood centre, and potentially a new primary school. The proposed provisions seek to incorporate design standards reflective of Medium Density Residential Standards associated with the proposed Tuumata Residential Precinct.

This submission therefore seeks to enable Fire and Emergency to carry out its requirements under the Fire and Emergency New Zealand Act 2017 more effectively in the protection of people, property, and the environment and addresses matters relating to activities required to be undertaken to enable an effective emergency response within the proposed Ruakura-Tuumata Structure Plan area.

1.2 Emergency service access

Fire and Emergency requires adequate access to the built and natural environment to ensure that they can respond to emergencies. This includes access in the event of fire, natural hazard, hazardous substances, medical, or a rescue or assist.

For fire appliances to access an emergency, adequate carriageway width, height clearance and road gradient is necessary to support the operational requirements of fire appliances. These requirements are necessary for Fire and Emergency personnel to be able to operate pumping appliances from a suitable hard standing. Often, this can be done from the public road, and this is how Fire and Emergency prefers to operate where possible. Each vehicle type has different dimensions; however, the maximum vehicle dimensions of Fire and Emergency's current fleet of vehicles has a width of 2.55m (6.5m when stabilisers are deployed), a height of 3.55m and a maximum length of 12.6m (refer Figure 2 of the Designers' guide to firefighting operations Emergency vehicle access F5-02 GD). To support efficient and effective emergency response, the general requirements relating to emergency vehicle access are as follows:

- Carriageway widths should not be less than 4m to accommodate a fire appliance. This width is required for firefighters to efficiently work around the fire appliance and safely access and operate the hoses and pumps.
- A clear vehicle crossing of no less than 3.5m wide should be provided as site entrances, internal entrances and between buildings.
- A height clearance at vehicle crossings and along carriageways should not be less than 4m. This includes gateways/doorways and overhanging structures (e.g. ducts, pipes, sprinklers, walkways, signs, structural beams, trees, hanging cables, etc.).
- The maximum negotiable gradient is 1:5, but in general the roading gradient should not exceed 16%.
- Operate pumping appliances from a hard standing capable of withstanding the fully laden weight of a fire appliance from which fire operations for a structure are conducted[7].

The full requirements for emergency vehicle access are set out in detail within the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008) and within the Firefighting Operations Emergency Vehicle Access Guide (F5-02 GD).

Fire and Emergency consider it is vital for the health, safety and wellbeing of the future Tuumata community that the needs of emergency services are taken into account as new development is being planned. It is also important that subdivision and subsequent development is designed to be well-functioning and resilient to ensure that communities can evacuate in the event of an emergency. If emergency services cannot access people in the event of an emergency, this will not enable or provide for well-functioning urban environment as set out in the vision statement in 3.7.1.iv.

[7] A vehicle hard-standing is a designated area that can withstand the laden weight and associated loads of the Fire and Emergency vehicle and its crew and facilitate firefighting operations. Refer to Section 4.5 of the Designers' guide to firefighting operations Emergency vehicle access F5-02 GD for more detail.

Fire and Emergency have reviewed the proposed transport and access provisions within the Ruakura-Tuumata Structure Plan and have specific comments on these matters. These are outlined following:

Proposed roads

The Transport Corridor cross sections as set out in Figure 2-14B Ruakura Tuumata Structure Plan: Transport Corridor Cross Sections of Appendix 3B of the application documentation indicate that Roads A, A2, B, B2, B3, B4, B5, and C4 appear to be of an acceptable width to enable Fire and Emergency vehicle access, being a total trafficable width of 6m or greater. These roads have sufficient carriageway width, which should accommodate the width of a fire appliance to operate from the road in the event of an emergency. Local roads with parking bays are generally supported, on the basis that this could provide an opportunity for road users to pull over into vacant parking spaces (if available) and allow emergency vehicles to pass when responding to an emergency.

The Transport Corridor cross sections labelled 'C', 'C2', and 'C3' propose drive lane widths of 2.85m, providing a total trafficable width of 5.7m. This narrower overall width would make Fire and Emergency vehicle access difficult, not only to traverse a 2.5m wide appliance along a road with urgency, but would likely result in the inability to operate an aerial appliance from the road, as these appliances require at least a 6.5m hardstand operating width.

With the proposed increase in urban density, and the correlating typology of residential units being multi-storey units or apartments, there is a higher likelihood that an aerial appliance will be required to respond to a residential fire. If the roads within the Ruakura Tuumata Structure Plan do not accommodate a fire appliance, this significantly increases the risk for the future Tuumata community and reduces the ability for Fire and Emergency to provide effective and fast fire emergency response.

While Fire and Emergency note that the Collector Road and Local Road network has been shown indicatively (Figure 2-14A with the indicative cross sections for this network shown on Figure 2-14B and its accompanying figures) and that the final design of the road network is to be in general accordance with that layout and cross sections and will be assessed and determined at subdivision stage, Fire and Emergency request that at minimum, the cross section figures for 'C', 'C2', and 'C3' be amended to indicate a minimum total carriageway width of 6m, with minimum 3m wide drive lanes. This will improve emergency vehicle access and should enable an aerial appliance to operate from these roads, if required.

Rear lanes, Jointly Owned Access Lots (JOALS) or Internal Vehicle Access[8]

Rear lanes should be designed to be wide enough to allow fire appliances to get through them easily and to allow Fire and Emergency personnel to carry out emergency operations. This means that when the fire appliance is parked, Fire and Emergency personnel can easily open and exit the doors, access equipment from its compartments and safely connect the hose to the pump. It will be important to discourage private cars parking within the rear lanes where this may obstruct or slow emergency response.

Care also needs to be given to any requirements for roadside landscaping, as the main trunk or upper over hanging branches of trees, once established, can prevent access by fire appliances (and other heavy vehicles such as rubbish trucks and moving trucks) down local roads and rear lanes.

While detailed design in relation to internal vehicle access has not been provided (as it is anticipated that this will be determined at the time of subdivision), Section 6.2 of the Urban Design Report (Appendix 12) indicates the use of JOALs to provide development flexibility by allowing for greater choice in future subdivision design and consent processes, and to achieve high amenity and safe streets, will be the primary form of private access to the super blocks as shown in the Master Plan.

[8] The submitter notes that terminology is used interchangeably throughout the plan change documentation, and our interpretation is that these terms specified have the same meaning.

Residential setbacks

Fire and Emergency recognise that TGH seek to incorporate design standards reflective of Medium Density Residential Standard but to retain the General Residential Zone performance standards for the new Tuumata Residential Precinct. The proposed minimum side and rear yard building setback in new Rule 4.15.6.c-d are proposed to be a minimum of 1m. This minimum width increases the risk of fire spreading and can inhibit Fire and Emergency personnel from getting to the fire source. The difficultly of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Fire and Emergency oppose Rule 4.15.6.c-d in this regard.

Clause C3 of the New Zealand Building Code is relevant here whereby buildings must be designed and constructed so that there is a low probability of fire spread to other property vertically or horizontally across a relevant boundary. Achieving this functional requirement is however limited by the mechanisms by which this is achieved (i.e. Acceptable Solutions) and buildings of which such requirements apply. If HCC are supportive of this built form and subsequent densities, it is therefore vital that the New Zealand Building Code is enforced and complied with to reduce the risk of fire spread in the intensified urban areas.

Fire and Emergency encourage HCC to consider integrating these considerations into relevant urban design guidelines to align with the New Zealand Building Code and prompt developments to consider fire risk mitigations early on in design. This should at a minimum also be included as an advice note with the relevant side and rear boundary setback rules within PPC15 to draw attention to these requirements early on in the resource consent process or that the minimum setbacks be increased to manage this risk under the RMA.

1.3 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 pressures available to service the future developments. In Hamilton city, water is sourced from the reticulated water supply network.

As indicated in the Infrastructure Report provided with the application, the water supply has been assessed in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008). The Infrastructure Report classifies firefighting water demand to FW2 to meet the water supply classification for the proposed residential area and concludes that the water supply system will be designed to provide sufficient pressure and flows for the development to comply with FW2. However, Fire and Emergency note that FW3 will likely be required for the Neighbourhood Centre, being a non-residential area. Fire and Emergency therefore seek clarification from the applicant as to what fire demand will be provided for the Neighbourhood Centre.

District plan rule framework

Fire and Emergency note that Section 6.1.3 of Regional Infrastructure Technical Specifications (RITS) requires the water supply network to comply with SNZ PAS 4509:2008 and that the network be designed to meet FW2 in residential areas. Fire and Emergency support the establishment of a water supply network in accordance with RITS and all HCC engineering design requirements. However, Fire and Emergency note that these documents are non-statutory, and compliance with these requirements are therefore not mandatory or enforceable by HCC as the regulator.

Policy 25.13.2.3g of the district plan requires that "*Water supply infrastructure is designed and constructed to meet consumption, hygiene, water-sensitive design and firefighting requirements*". The subsequent Rule 25.13.4.4 – Water requires:

a. *An adequate, reliable, safe and efficient supply of potable water shall be provided.*

b. *Where any subdivision or development results in additional allotments or buildings to be used for urban purposes, provision shall be made for:*

    i. *Water metering infrastructure, and either*

    ii. *A connection from the public water supply reticulation to each proposed residential allotment or existing building, or*

    iii. *A public water supply reticulation system extending from the main trunk water supply system (or from an existing water supply reticulation if appropriate) to allow a service to be connected from the transport corridor frontage of each non-residential allotment.*

c. *In the Future Urban Zone and Large Lot Residential Zone (Ruakura Structure Plan area only) where a water supply reticulation system is not provided, evidence of satisfactory water supply shall be provided as part of the consent application.*

d. *A reticulation system shall be provided which is adequate for fire-fighting purposes and for estimated domestic and commercial consumption.*

e. *Where a development results in high-use allocation from the water supply reticulation system, evidence of satisfactory water supply shall be provided.*

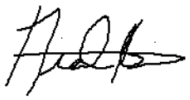
However, there is no explicit requirement for the future developer to demonstrate compliance with SNZ PAS 4509:2008 or for HCC to require the provision of a firefighting water supply in accordance with SNZ PAS 4509:2008. Therefore, there is a risk that the development of the Ruakura-Tuumata Structure Plan area will not adequately address firefighting water supply servicing or require additional levels of service, if and when required within the proposed Ruakura-Tuumata Structure Plan area.

To manage fire risk in the plan change area, Fire and Emergency considers that all subsequent subdivision and development in the Ruakura–Tuumata Structure Plan area should be subject to a development standard within the district plan requiring all subdivision and development to demonstrate that they can be adequately serviced for firefighting water supply in accordance with the SNZ PAS 4509:2008 at the time of resource consent and conditioned accordingly. If this does not become part of the consenting regime, this could lead to residential developments with inadequate firefighting water supply with potentially serious consequences for life and property, with this risk increasing as a result of climate change impacting on existing water sources, and other environmental and demographic changes across communities of which fire will present a greater and more frequent risk.

Fire and Emergency's specific relief is set out in **Appendix A**.

Fire and Emergency would welcome any questions or further engagement with the applicant on matters raised in this submission.

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



Nicola Hine
Beca Limited
Dated: 17 May 2023

Appendix A

The following table sets out the specific position and any amendments sought by Fire and Emergency. Where specific amendments to provisions of PPC15 are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Provision	Support / oppose	Submission	Requested relief
Chapter 3 Structure Plans				
1	Policy 3.7.3.13f	**Support in part**	Fire and Emergency support Policy 3.7.3.13f to the extent that Fire and Emergency recognise the need to prioritise the movement of pedestrians and cyclists, but request acknowledgement that emergency service vehicles need to be appropriately accommodated and prioritised. Fire and Emergency request recognition in this policy in this regard. Fire and Emergency also recognise the intent of 3.7.3.13.f(vi) providing a continuous tree canopy along transport corridors and the benefits of this in the urban environment, but request that care needs to be given to any specimen selection for roadside landscaping, as main trunk or upper over hanging branches of trees, once established, can prevent access by fire appliances (and other heavy vehicles such as rubbish trucks and moving trucks) particularly down the narrower local roads and rear lanes. This would help to ensure that the Ruakura-Tuumata development achieves the outcomes anticipated in objective 3.7.3.12 being a well-functioning urban environment that is integrated.	Amend as follows: 3.7.3.13f The transport network shall prioritise the movement of pedestrians and cyclists over vehicles, incorporate the principles of CPTED, and provide; […] vii. A transport network that provides for and accommodates emergency service access and operations.
Chapter 4 Residential Zones				
2	Objective 4.2.16	**Support**	Fire and Emergency support new objective 4.2.16 to the extent that it requires development in the Tuumata Residential Precinct to be undertaken in a manner to ensure a well-functioning urban environment and is coordinated with the provision of infrastructure and services.	Retain as notified.

ID	Provision	Support / oppose	Submission	Requested relief
			It is paramount for Fire and Emergency that development is co-ordinated with the delivery of the transport network and an adequate reticulated water supply network sufficient for firefighting.	
3	Policy 4.2.16b	**Support**	Fire and Emergency support new Policy 4.2.16b as it requires that new residential development must be able to be adequately serviced by three waters and transport infrastructure. This would include an adequate reticulated water supply network sufficient for firefighting and sets up a suitable policy framework for the subsequent relief sought below.	Retain as notified.
4	Policy 4.2.17a	**Support in part**	Fire and Emergency support Policy 4.2.17a to the extent that it sets the basis for a well-functioning residential precinct. However, Fire and Emergency seek acknowledgement of the need for all residential units and resident development to have adequate access that suitable for emergency services.	Amend as follows: 4.2.17a All residential units and residential development shall have: […] ix. adequate provision of emergency service access.
5	Rule 4.15.6 Building Setbacks (Rule 4.15.6.c-d, f)	**Oppose**	As set out in Section 1.2 above, Fire and Emergency oppose Rule 4.15.6.c-d for reasons that the proposed minimum side and rear yard building setbacks for the Tuumata Residential Precinct of 1m significantly increases the risk of fire spreading and can inhibit Fire and Emergency personnel from getting to the fire source. The difficultly of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Fire and Emergency further oppose Rule 4.15.6f. that enables the minimum side and rear yard setback to be reduced further in specified scenarios. This could result in very poor urban design scenarios or result in the inability for Fire and Emergency personnel to physically gain access to residential units or developments in a fire or	Add advice note to Rule 4.15.6: Advice note: Building setback requirements are further controlled by the Building Code. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers

ID	Provision	Support / oppose	Submission	Requested relief
			other emergency. Fire and Emergency consider any reduced setback should result in non-compliance and require resource consent which will enable the risks of non-compliance to be assessed appropriately by HCC. Fire and Emergency recognise that TGH seek to incorporate design standards reflective of Medium Density Residential Standard but to retain the General Residential Zone performance standards for the new Tuumata Residential Precinct. This is however understood to not be a mandatory application as per the NPS-UD and therefore Fire and Emergency request that careful consideration is given to in the application of 1m setbacks in this urban environment. Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code however consider it important that these controls are bought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the New Zealand Building Code requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with Rule 4.15.6 directing plan users to the requirements of the New Zealand Building Code.	of Building Code requirements will be considered/granted. And **Delete** Rule 4.15.6f. in full
6	Rule 4.15.6 Building Setbacks (Rule 4.15.6.g-h)	**Support**	Fire and Emergency support Rule 4.15.6.g to the extent that no part of a building (including eaves) shall extend over or encroach into an internal vehicle access (which has been interpreted to apply to the proposed JOALs) and further support Rule 4.15.6.h where a 1m setback of residential units from an internal vehicle access is required where more than three residential units are being served. This will assist in facilitating efficient and effective emergency vehicle access.	Retain as notified.
7	4.15.8 Public Interface	**Support in part**	Fire and Emergency support Rule 4.15.8(c) to the extent that all residential developments in Tuumata residential terrace dwellings and Tuumata residential apartment dwellings must have pedestrian access from a transport corridor to the front door of each residential unit, or to the single front door and lobby of an apartment building. However, this support is subject to the required pedestrian	Retain as notified, subject to confirmation of the application of Rule 4.15.8(c).

ID	Provision	Support / oppose	Submission	Requested relief

			access not being the only access (i.e. pedestrian only developments with no on-site vehicle access).
			
			It is noted that to support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to pedestrian only access developments (should such developments be provided for), Fire and Emergency require:
			
			• pedestrian accessways are designed to be clear and unobstructed,
			• pedestrian accessways have a minimum width of:
			  - 3m on a straight accessway.
			  - 6.2m on a curved or cornered accessway,
			  - 4.5m space to position the ladder and perform operational tasks.
			• wayfinding for different properties on a development are clear in day and night
			• developments give effect to the guidance provided in Fire and Emergency's 'Designer's Guide' to Firefighting Operations Emergency Vehicle Access'.
			
			If pedestrian only development is intended to be enabled within the Tuumata Residential Precinct, Fire and Emergency request that the above minimum requirements are incorporated as part of PPC15.	

Chapter 23 Subdivision				
8	Objective 23.2.8	**Support**	Fire and Emergency support Objective 23.2.8 to the extent that the expectation is that subdivision contributes to a well-functioning urban environment that is generally consistent with the Ruakura -Tuumata Structure Plan on Figure 2-14A Ruakura - Tuumata Structure Plan and Figure 2-14B Transport Corridor Cross Sections. As indicated in this submission, Fire and Emergency are generally supportive of the indicative cross sections set out in Figure 2-14B however request amendment to the cross section figures for 'C', 'C2', and 'C3' to indicate a minimum total carriageway width of 6m, with minimum 3m wide drive lanes. This will improve emergency	Retain as notified.

ID	Provision	Support / oppose	Submission	Requested relief
			vehicle access along these corridors and should enable an aerial appliance to operate from these roads, if required.	
9	Policy 23.2.8b	**Support in part**	Fire and Emergency support Policy 23.2.8b to the extent that the policy seeks a safe urban environment that minimises the creation of rear lots and cul de sacs. This is supported by Fire and Emergency as rear lots and cul de sacs, if poorly designed, can adversely impact the ability for fire appliances to manoeuvre or access a site during an emergency. This policy also enables the provision of rear lots. Fire and Emergency request an amendment to this policy requiring the provision for adequate emergency service access as this is an imperative component of enabling a safe urban environment.	Amend as follows: 23.2.8b Enable safe and attractive urban environment with a high level of amenity by: […] viii. Providing adequate emergency service access.
10	Policy 23.2.8c	**Support in part**	Fire and Emergency support Policy 23.2.8c to the extent that 23.2.3c(iii) requires the provision for on-street parking in recessed parking bays to ensure carriageways are kept clear from parked cars. This is important from an emergency response perspective in that all corridors are clear of obstructions such as parked vehicles so that Fire and Emergency are able to traverse the corridor but also operate from the road, if required.	Retain as notified.
11	Policy 23.2.8e	**Support in part**	Fire and Emergency support Policy 23.2.8e to the extent that rear lanes are to be designed to be limited in length, to create low vehicle speeds, provide for the safety of users and make walking and cycling more attractive by minimising trip lengths. Limiting the length of rear lanes is also of benefit to Fire and Emergency during emergency response as it means fire appliances do not have to traverse long rear lanes to get to an emergency i.e. structure fire. This will reduce the likelihood of poor design outcomes where fire appliance are unable to get to an emergency and means that Fire and Emergency are more likely to be able to operate from the road hardstanding where rear lanes do not exceed hose run of 75m. However, it is important to note that Fire and Emergency prefer to operate as close to the	Retain as notified.

ID	Provision	Support / oppose	Submission	Requested relief
			emergency as possible (within 20m as per the New Zealand Building Code) and therefore providing for emergency vehicle access in accordance with SNZ PAS 4509:2008 and the Firefighting Operations Emergency Vehicle Access Guide (F5-02 GD) is paramount.	
12	23.7.9 Ruakura - Tuumata Structure Plan Area as shown on Figure 2-14A at Appendix 2 (all zones)	**Support**	Fire and Emergency support Rule 23.7.9.a where the minimum transport corridor boundary length is 10m for vacant fee simple residential lots.	Retain as notified.
13	23.7.9 Ruakura - Tuumata Structure Plan Area as shown on Figure 2-14A at Appendix 2 (all zones)	**Support in part**	Fire and Emergency support Rule 23.7.9.c(i) that require a 7m minimum legal width for a two-way rear lane which will accommodate a fire appliance. Fire and Emergency further support Rule 23.7.9.c(iii) whereby each land shall be designed to provide access and egress for large rigid trucks such as fire trucks. Fire and Emergency further support Rule 23.7.9.c(iii)(b) that requires rear lanes to be connected to the transport corridor at each end. This will reduce the need for turning areas or for emergency service personnel to reverse manoeuvre fire appliances which can put the public and firefighters at risk, particularly during emergency response. Rule 23.7.9.c(iii)(c) is also important as rear lanes need to remain clear of obstruction (such as illegally parked cars) so that Fire and Emergency can quickly get to the site of the emergency. In order for plan users to demonstrate compliance with Rule 23.7.9.c(iii) relating to emergency service access, Fire and Emergency request an advice note that directs plan users to consider that specific reference should be made to SNZ PAS 4509:2008 and the Firefighting Operations Emergency Vehicle Access Guide (F5-02 GD) in the form of an advice note to direct plan users as the relevant documents	Add new advice note: Refer to the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008) and the Designers' guide to firefighting operations Emergency vehicle access F5-02 GD to ensure adequate provision is made for fire truck access and egress.

ID	Provision	Support / oppose	Submission	Requested relief
			that will enable them to demonstrate how compliance can be achieved in relation the fire appliance access and egress.	
Chapter 25 Three Waters				
14	New	**New**	Fire and Emergency recognise that it is the intent that subdivision consents for the Ruakura -Tuumata Structure Plan area are expected to further refine the three waters infrastructure needs in accordance with Figures 2-15A and B Ruakura Strategic Infrastructure (Three waters). Fire and Emergency request that Council do not enable development within the Ruakura-Tuumata Structure Plan area unless it is matched with the delivery of key water strategic infrastructure (network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the water supply network (unless the development itself includes necessary upgrades). As indicated in the Infrastructure Report provided with the application, the water supply has been assessed in accordance with SNZ PAS 4509:2008. The Infrastructure Report classifies firefighting water demand to FW2 to meet the water supply classification for the proposed residential area and concludes that the water supply system will be designed to provide sufficient pressure and flows for the development to comply with FW2. However, Fire and Emergency note that FW3 is required for non-residential which would include the Neighbourhood Centre. Fire and Emergency therefore seek clarification from the applicant as to what fire demand will be provided for the Neighbourhood Centre. Fire and Emergency seek a specific rule in the district plan via PPC15 requiring all subdivision and development in the Ruakura-Tuumata Structure Plan area to demonstrate compliance in accordance with SNZ PAS 4509:2008. This would include the provision of additional supply over and above what is provided via the reticulated network where a higher level of service is required or where it is	Add new rule as below: ***25.13 Three Waters*** ***25.13.4.4 Water*** … *f. Where any subdivision or development results in additional allotments or buildings within the Ruakura-Tuumata Structure Plan area, provision for sufficient firefighting water supply must be provided in accordance with the New Zealand Fire Service Firefighting Water Supply Code of Practice (SNZ PAS 4509:2008).* Alternatively, an amendment to the information requirements for Water Impact Assessments be amended to include the following: ***25.13.4.6 Water Impact Assessments*** *a. A Water Impact Assessment, as described in Volume 2, Appendix*

ID	Provision	Support / oppose	Submission	Requested relief
			determined that there is insufficient capacity in the water supply network at the time of development.	*1.2.2.5, is required for any development or subdivision:* *[…]* *viii. within the Ruakura-Tuumata Structure Plan area* ***1.2.2.5 Water Impact Assessments Table 1.2.2.5a:*** *Information required for each type of Water Impact Assessment* *[…]* *xxi. Where any subdivision or development is to occur in the Ruakura-Tuumata Structure Plan area, confirmation that there is sufficient firefighting water supply capacity in the network that is compliant with the New Zealand Fire Service Firefighting Water Supply Code of Practice (SNZ PAS 4509:2008*
Volume 2, Appendix 1.3 Assessment Criteria				
15	1.3.3 Restricted Discretionary, Discretionary and Non-Complying	**Support in part**	Fire and Emergency support the direction of N15. Fire and Emergency request that explicit consideration is given as to whether the subdivision provides for a comprehensive and connected transport network which incorporates as necessary, the design of the transport network that is accessible for emergency services.	Amend as follows: N15 Ruakura- Tuumata Structure Plan – Subdivision

ID	Provision	Support / oppose	Submission	Requested relief
	Assessment Criteria N15 - Ruakura – Tuamata Structure Plan Subdivision		There are a number of locations where Fire and Emergency's relief could be incorporated into the existing matters of discretions set out (b)-(m), therefore suggested wording has been provided to meet Fire and Emergency's requested relief.	[…] b. Whether the subdivision provides for a comprehensive and connected Open Space and transport network which incorporates as necessary: […] x. The extent to which the transport network and where rear lanes are required for vehicle access, are accessible for emergency services and compliant with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008) and the Designers' guide to firefighting operations Emergency vehicle access F5-02 GD.
16	1.3.3 Restricted Discretionary, Discretionary and Non-Complying Assessment Criteria N16 Ruakura: Tuumata Structure Plan –	**Support in part**	Fire and Emergency support the direction of N16. Fire and Emergency however request that explicit consideration is given to whether the Neighbourhood Centre is designed to accommodate for emergency service access and operations.	Amend as follows: c. The extent to which the streetscape and road corridors have been designed to: […] vi. Be accessible for emergency services and compliant with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS

ID	Provision	Support / oppose	Submission	Requested relief
	Neighbourhood Centre			4509:2008) and the Designers' guide to firefighting operations Emergency vehicle access F5-02 GD.
17	1.3.3 Restricted Discretionary, Discretionary and Non-Complying Assessment Criteria N17 – Tuumata Design and Layout	**Support in part**	Fire and Emergency support the direction of N17. Fire and Emergency however request that explicit consideration is given to whether the site layout and design of the Tuumata Structure Plan area accommodates emergency service access and operations. Fire and Emergency support N17(d) which requires a determination as to whether Tuumata residential terrace dwellings and Tuumata residential apartment dwellings: (i) Provides clear, convenient and safe access for all modes of transport through the site. (vii) Has been designed to accommodate manoeuvring of large rigid trucks such as fire appliances within the transport corridor. (viii) Where utilising rear lanes, the extent to which the lane is designed to accommodate the passage of large rigid trucks such as fire appliance (where these are proposed to enter the rear lane).	Amend as follows: Context a. Whether the proposal: [...] v. Has been designed in a manner that supports the movement of emergency service vehicles and enhances pedestrian and cycle movements, including access to the transport network.
18	A – General Criteria	**Oppose**	Fire and Emergency understand that A – General Criteria will set out matters of discretion for residential units where they infringe one or more of the standards applicable to the Tuumata Residential Precinct. This is not subject to amendment through PPC15 however Fire and Emergency request that an additional matter of discretion be introduced that requires developers and Council to assess the extent of non-compliance with the rear and side yard setbacks introduced through PPC15.	Add new matter of discretion specific to the Tuumata Residential Precinct: Tuumata Residential Precinct a. The extent to which the proposed rear, side or front setback will enable emergency service access or egress, including the movement of residents in a fire or natural hazard emergency.

ID	Provision	Support / oppose	Submission	Requested relief
			This will provide Council discretion to assess the extent of risk to people, property, the environment and emergency response (including firefighter safety) as a result of non-compliance with the required minimum setbacks.	
Appendix 2 Structure Plans				
19	Ruakura-Tuumata Structure Plan Figure 2-14B Transport Corridors	**Support in part**	As set out in Section 1.3 of this submission. Fire and Emergency request that the Figure 2-14B cross sections for Transport Corridors labelled 'C', 'C2', and 'C3' are amended to indicate drive lanes of no less than 3m to provide a total carriageway width of no less than 6m to facilitate fire appliance operations. This is in keeping with Table 15-6a)ii, Volume 2, Appendix 15: Transportation of the Hamilton City Operative District Plan, which sets out the criteria for the form of Transport Corridors, which requires a minimum carriageway width of 6m for Local Roads.	Amend Figure 2-14B to reflect a minimum 6-metre-wide total carriageway width, comprising 3m for each lane, for Transport Corridors labelled 'C', 'C2', and 'C3'.