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Waimakariri District Council
215 High Street
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13 September 2024

Attention: Commissioners

Dear Hearing Commissioners

Fire and Emergency New Zealand letter to be tabled in lieu of attendance at hearing — Proposed Waimakariri District Plan – Medium Density Residential Zone

Fire and Emergency New Zealand (Fire and Emergency) made a submission on the Proposed Waimakariri District Plan. Fire and Emergency have opted not to attend hearings scheduled to commence on 16 September 2024 and requests that, in lieu of attendance, this letter be tabled for the Hearing Commissioners consideration.

Fire and Emergency sought one change to the Proposed Waimakariri District Plan – Medium Density Residential Zone. The section 42A report for the plan's Medium Density Residential Zone has been reviewed. The relief sought by Fire and Emergency and the officer's recommendations is outlined below.

MRZ- R28

Fire and Emergency opposed in part MRZ-R28 as the proposed rule does not provide for emergency service facilities in the Medium Density Residential Zone. Fire and Emergency sought these facilities to be provided for as a permitted activity, noting that compliance would still be required with built form standards.

The reporting officer rejected the submission and noted that the proposed plan has no definition of emergency services facility and that there was a lack of evidence on the likely effects on Fire and Emergency. Fire and Emergency acknowledges the reporting officer's reasoning.

However, Fire and Emergency respectfully request that if emergency facilities cannot be provided for as a permitted activity within the Medium Density Residential Zone, then they are provided for as a restricted discretionary activity and request that the following matters of discretion are included:

- The extent to which there is a functional and/or operational need to locate the activity in the medium density residential zone,
- The extent to which the activity may adversely impact on the transport network,
- The extent to which the activity may adversely impact on the streetscape and the amenity of the neighborhood, with particular regard given to the bulk of the buildings, and
- The extent to which the activity may adversely impact on the noise environment.

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This will better provide for health and safety of the community by enabling the efficient functioning of FENZ in establishing and operating fire stations.

New fire stations may be necessary in order to continue to achieve emergency response time commitments in areas where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations.

Note that Fire and Emergency also requested the same permitted provision for the General Residential Zone chapter (GRZ-R28) and the Settlement Zone chapter (SETZ-R30). The reporting officer assessing these chapters recommended that the submission be accepted in part to be a restricted discretionary activity. The reporting officer considered it to be appropriate to align the activity status of emergency service facilities across the GRZ, SETZ and LLRZ. This has been accepted by Fire and Emergency.

With this in mind, Fire and Emergency wish to reiterate the importance of their original submission and the points raised within it as well as those raised above.

Yours sincerely



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Planner

on behalf of

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