

Julia Chalmers

From: QLDC Services
Sent: Thursday, 18 August 2016 8:13 AM
To: Helen Parr
Subject: FW: Arrowtown Design Guidelines Submission - NZ Fire Service Commission
Attachments: NZ1-12963172-Arrowtown Design Guidelines Submission - NZFS Commission (0).pdf

From: Alex Strawbridge [<mailto:alex.strawbridge@beca.com>]
Sent: Wednesday, 17 August 2016 5:08 PM
To: QLDC Services
Cc: Alice Burnett
Subject: Arrowtown Design Guidelines Submission - NZ Fire Service Commission

Hello,

Please find attached a submission made on behalf of the New Zealand Fire Service Commission regarding Proposed Plan Variation 1 to the Queenstown Lakes District Plan.

May I please have confirmation of receipt of this email.

Thanks and regards,

Alex Strawbridge

Senior Planner

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Form 5

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

Clause 6 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council (the Council)
Name of submitter: New Zealand Fire Service Commission (the Commission)
This is a submission on: Plan Variation 1 - Arrowtown Design Guidelines 2016 (Variation 1)

The Commission could not gain an advantage in trade competition through this submission.

The specific provisions of Variation 1 that this submission relates to are:

The aspects of the Arrowtown Design Guide 2016 (the Design Guide) that have the potential to inappropriately restrict or prevent the effective and efficient the operation of the Arrowtown Fire Station.

The Commission's submission is:

The Commission is the governing body that controls the NZ Fire Service (NZFS). This role is established under the Fire Service Act 1975, which sets out the governance, management and operational requirements for protecting life and property from fire in New Zealand.

One of the key roles of the Commission is to ensure that the NZFS is able to operate in an effective and efficient manner. A key aspect of this is to ensure that the NZFS can operate from properties and facilities that are designed in a manner that supports their activities. A more detailed description of the design requirements of fire stations is provided in the Background section below.

The Arrowtown Fire Station (2 Hertford Street) is located within the Arrowtown Residential Historic Management Zone (ARHMZ) of the Proposed Queenstown Lakes District Plan ('the Proposed Plan'). Under the Design Guide, the Arrowtown Fire Station is located within the 'Old Town Residential Area', specifically within 'Neighbourhood 4 – Top Terrace (Wiltshire Street to Stafford Ridge)'. A fire station was first erected on this same site in 1897. The NZFS in its various organisational forms has been present on this site since then, with the facilities being upgraded as required to reflect progression in equipment and operational requirements.

The NZFS exists to protect the social, economic and environmental well-being of the community in terms of protection against fire damage, loss of property and life. This includes the protection of heritage buildings and structures during a fire emergency. As set out in more detail below, the NZFS requires certain design aspects for a fire station in order to be able to both prepare for and respond to a fire emergency. The Commission notes that the Design Guide does not allow for essential community services that have certain design requirements that may not completely align with the directions set out in the Guide. Particularly, the following aspects of the Design Guide restrict essential design aspects of the Arrowtown Fire Station:

- 4.7 – The Cottage and Shed Building Types: the height and bulk dimensions set out in this section are focussed on residential development and do not take into consideration other forms of land use that may be required to be located within the ARHMZ, such as the Arrowtown Fire Station. The Fire Station does not meet these dimension requirements, and any

alterations/redevelopment will also not be able to comply, given the operational requirements of a fire station, the need to house large vehicles, and location of siren poles and hose drying towers.

- 4.14 – Parking, Driveways and Garages: the requirements for these aspects of development are also focussed on residential land uses. The Arrowtown Fire Station requires clear and open access ways for fire appliances when responding to an emergency in a swift and safe manner. Car parking needs to be easily accessible for volunteers when arriving at the Station. The requirement to avoid parking on the front of a section, and for driveways to be a single car width only are therefore not able to be met. Similarly, constraints on the type of paving used may not be feasible or practical given the weight of fire appliances.

Any maintenance, alteration and/or redevelopment of the site is not expected to be dramatically different to the bulk, height and hard surface coverage of the activities that are currently present on the site, and any further degradation of the wider heritage environment would therefore be expected to be minimal. Any redevelopment of the Arrowtown Fire Station would not be expected to interfere with the identified key views of the Neighbourhood 4 – Top Terrace area as identified in Section 2.5.5 of the Design Guide, nor contribute to the 'Threats' identified for this area. It is also noted that any redevelopment of the site will need to comply with the provisions of the District Plan, or apply for resource consent.

The Commission notes that any departure from the Design Guide is strongly discouraged within the Objectives, Policies and Rules of the Proposed District Plan. The Commission is not opposed to the protection of the significant heritage value of Arrowtown. However, in the interests of allowing for the continued effective protection of Arrowtown during fire and other emergencies, the Commission requests that specific exemptions be made within the Design Guide to allow for the essential design requirements of the Arrowtown Fire Station at 2 Hereford Street.

Background:

The Commission has also submitted on the Proposed Queenstown Lakes District Plan (as Submitter #438). This submission includes a more detailed description of the statutory mandate of the Commission (under the Fire Service Act 1975) and the operational requirements of the NZFS in terms of the provision of fire stations. With regards to the Arrowtown Fire Station, this submission notes and supports that 'Community Activities' (which include fire stations) are listed as a Permitted Activity in Rule 10.4.17 within the ARHMZ, subject to compliance with relevant Standards. In addition, to assist with facilitating the on-going permitted operation of the NZFS within Arrowtown, the submission has requested an exemption for fire stations from Standards 10.5.3 (Building Coverage), 10.5.4 (Combined Building Coverage and Hard Surfacing) and 10.5.1 (Building Height – for fire station towers only). Exemptions to allow for the essential design requirements of the Arrowtown Fire Station within the Design Guide will also assist with ensuring that the NZFS can continue to operate from this site without contravening the wider Objectives and Policies proposed for this Zone.

Fire Station Design Requirements

The Commission provides to the New Zealand Government a Statement of Intent (SOI) under which it operates and funding is provided. The SOI describes the overall outcomes the Commission seeks to achieve in its capacity as the governing board of the NZFS.

The SOI contains a commitment by the Commission to the New Zealand Government for the following:

- Response times to emergencies in urban areas –

- Career fire stations within 8 minutes for 90% of emergency call outs;
- Volunteer fire stations within 11 minutes for 90% of emergency call outs;
- Medical emergencies relating to motor vehicle accidents within 30 minutes for 90% of emergency call outs;
- Emergencies involving the HAZMAT appliance within 20 minutes for 90% of emergency call outs.
- Response times to emergencies in rural areas –
 - 95% of the rural population and 95% of rural addresses are within 10 minutes travel time of either a NZFS urban fire station or the Rural Fire Authority.
- Fire safety prevention –
 - 98% of the population will believe a fire can become un-survivable in 5 minutes or less.

In order to meet these commitments, fire stations must be able to be located throughout the urban environment, including in residential and more sensitive areas. The response times listed above are critical for determining the optimal location for fire stations and their primary response area.

In order to effectively carry out their operations, the NZFS requires facilities which meet certain operational specifications and the ability to carry out essential activities at these facilities. In order to operate effectively within the primary response area fire stations have functional requirements which are difficult to compromise. These include:

- the height and length of fire appliance bays;
- set back distance of appliance bays from road frontages to accommodate the stopping of appliances outside bays but off the road reserve area;
- appliance cleaning areas;
- hose drying towers;
- operational noise; and
- on-site training facilities and areas for training exercises.

In terms of height requirements, fire stations will generally be single storied buildings within 8-9 metres in height. Hose drying towers may also be required in some cases, which can be around 12-15 metres in height.

The Commission seeks the following decision from the local authority:

That the Arrowtown Fire Station be recognised as an essential community activity within the ARHMZ by exempting any alterations and/or redevelopment relating to the operations of the NZFS from the Design Guide in terms of:

- the height and bulk of buildings and structures
- The configuration of parking and access

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

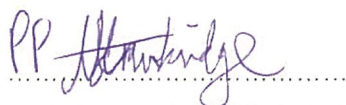
If others make a similar submission the Commission will consider presenting a joint case with them at a hearing.

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Email: alice.burnett@beca.com

Contact person: Alice Burnett, Planner

A handwritten signature in purple ink, appearing to read 'PP [unclear]', written over a dotted line.

(Signature of person authorised to sign on behalf of the Commission)

Date: 17 August 2016