

RPS

From: Metsers, Liz <Liz.Metsers@fireandemergency.nz>
Sent: Thursday, 2 September 2021 3:43 p.m.
To: RPS
Subject: Proposed Otago Regional Policy Statement 2021 - submission - FENZ
Attachments: form-5-written-submissions-form-on-proposed-otago-rps-2021 - FENZ Te Kei v0.1.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Submission - Sector stakeholder

Tēnā koutou,

Please find attached a submission from our Region, Te Kei (Otago and Southland). Please note we recognise that the RPS doesn't contain a lot that is directly applicable to FENZ, and that the Statement provides high-level guidance and a framework around resource management in Otago. However we saw it as an example to be both more proactive in improving our awareness of external planning documents and engaging via the submission process where there are any links with FENZ.

Ngā mihi nui | many thanks

Liz Metsers

Planning and Performance Manager
Te Kei Region (Otago & Southland)

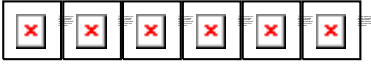
85 Castle St
PO Box 341
Dunedin 9054

What 3 words: <https://w3w.co/strays.jacket.indirect>



M: 027 481 3076
liz.metsers@fireandemergency.nz
www.fireandemergency.nz





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Proposed Otago Regional Policy Statement 2021

Information for Submitters

Submissions must be in the prescribed form (Form 5) specified by the Resource Management Act and must be received by Otago Regional Council
by 3 pm Friday 3 September 2021

Privacy: Be aware that **all submissions are considered public**, including your name and address which will be uploaded to ORC website as part of this process. The Council and further submitters will use your name and contact details for correspondence in relation to the making of the Regional Policy Statement.

LODGE A SUBMISSION MANUALLY (*USING FORM BELOW*)

A template complying with the requirements of Form 5 is provided below. Once completed, please forward to ORC by one of the following:

Email: rps@orc.govt.nz Submissions in MS Word or other editable format are preferred, if possible

Post: Otago Regional Council, Private Bag 1954, Dunedin 9054. Att: ORC Policy Team

Hand Delivery at

Dunedin: Otago Regional Council Office, 70 Stafford St, Dunedin, Att: ORC Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: ORC Policy Team

Alexandra: William Fraser Building, Dunorling Street, Alexandra. Att: ORC Policy Team

INQUIRIES

Email: rps@orc.govt.nz

Phone: ORC Call Centre: 0800 474 082, Monday - Friday, 8am-5pm

NOTES TO PERSON MAKING A SUBMISSION

If you are a person who could gain an advantage in **trade competition** through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be **struck out** if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Go to Written Submission Form on next page

Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

Fire and Emergency New Zealand – Te Kei Region (Otago/Southland)

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I **could not** gain an advantage in trade competition through this submission. *(See notes to person making submission)*
4. I **am not** directly affected by an effect of the subject matter of the submission that
- a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition *(See notes to person making submission)*
5. I **do not wish** to be heard in support of my submission
6. If others make a similar submission, I **will not** consider presenting a joint case with them at a hearing
7. **Submitter Details**

- a. **Signature of submitter** *(or person authorised to sign on behalf of submitter)*

Liz Metsers

- b. **Signatory name, position, and organisation** *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name Liz Metsers

Position Planning & Performance Manager

Organisation Fire and Emergency New Zealand

- c. **Date**

02/09/2021

Address for service of submitter (This is where all correspondence will be directed)

d. Contact person (name and designation, if applicable)

Liz Metsers

e. Email:

liz.metsers@fireandemergency.nz

f. Telephone:

0274813076

g. Postal address (or alternative method of service under [section 352](#) of the Act):

PO Box 341, Dunedin 9054

8. My submission is:

| Column 1 | Column 2 | Column 3 | Column 4 |
|--|--|--|---|
| <p><i>The specific provisions of the proposal that my submission relates to are:</i></p> <p><i>(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-O1'.)</i></p> | <p><i>I support or oppose the specific provisions or wish to have them amended.</i></p> <p><i>(Please indicate "support" or "oppose" or "amend")"</i></p> | <p><i>The reasons for my views are:</i></p> | <p><i>I seek the following decision from the local authority:</i></p> <p><i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i></p> |
| <p>Theme: working with external stakeholders</p> <p>References on pages 12, 168-70, 188, 198</p> | <p>Support</p> | <p>p12 - We would like to endorse all references to working with stakeholders in order to provide input on the following areas as they relate to fire safe practices, urban development and design, water use and air quality. As a stakeholder we are keen to</p> | |

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| <p>HAZ-NH-M2 (1) (a)</p> <p>HAZ-NH-M4 District Plans (6)</p> <p>HAZ-NH-M5 – Other incentives and mechanisms (2)</p> | | <p>represent the perspective of an emergency service who responds to emergencies in the community but also work to ensure our communities are aware of general fire safety, safe burning practices and consider fire risk when building in and developing rural areas.</p> <p>p168 – as fire is considered a natural hazard in the definitions, we would endorse local authority engagement with communities and stakeholders regarding risk level thresholds as per HAZ-NH-M2 (1) (a).</p> <p>p169 – FENZ are likely to have a role in any emergency arising from a natural hazard event such as fire. For example, new development proposals in close proximity to native vegetation.</p> <p>p170 – Key stakeholders referred to in (2) could include FENZ as a subject matter expert around the impact of fire as a natural hazard</p> | <p>Could ‘emergency services’ could be included as a stakeholder somewhere within the RPS?</p> <p>District Plan provisions mentioned in (6) could include consultation with agencies such as FENZ.</p> <p>Include FENZ in key stakeholder list.</p> |
| <p>Theme: identifying places of significance</p> <p>References on pages 19, 61, 91-92, 109, 114, 133, 172-3, 175-6, 179-80</p> | <p>Support</p> | <p>We endorse regular review and publication of significant built and natural places within planning documents as this enables us to ensure we are also aware of these places during emergencies or conducting other FENZ business and can plan the appropriate response and notifications in an emergency.</p> <p>Such places include critical buildings (p19), places/areas/landscapes of cultural, spiritual or traditional significance to Kāi Tahu (p61), wāhi tapu and wāhi taoka (p91-92), wāhi tupuna (p175), indigenous habitat for coastal species (p109), cultural and historic heritage</p> | <p>Suggestion: share registers and mapping layers of significant places/sites/areas to enable joint planning activities and foster shared situational awareness.</p> |

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| | | coastal areas (p109), areas containing significant values (p114), outstanding water bodies (p133), sites of known or potentially contaminated land (p172), facilities/services for waste materials (p172), sites for hazardous activities (p173), places with historic heritage (p180). | |
| <p>Theme: ability of emergency services to access communities in a timely manner</p> <p>EIT-TRAN-M8 – District plans (3)</p> <p>EIT-TRAN-PR3 – Principal reasons</p> <p>UFD-O2 – Development of urban areas</p> <p>UFD-P1 – Strategic planning</p> <p>UFD-M1 – Strategic planning</p> | Support/amend | <p>EIT-TRAN-M8 – District plans (3) (p163) – the “accessibility” in design standards also needs to recognise the accessibility for emergency services vehicles; fire appliances in our case.</p> <p>EIT-TRAN-PR3 – Principal reasons (p164) – for the transport system to effectively serve local communities, emergency services need to be considered when it comes to access.</p> <p>UFD-O2 – Development of urban areas (2) (p186) -</p> <p>UFD-P1 – Strategic planning (7) (p188) – we would like to suggest a multi-agency approach to facilitating involvement of the current community and respond to foreseeable needs of future communities, especially with regard to improving resilience to natural hazards (4).</p> <p>UFD-M1 – Strategic planning (5)(b) – p191 – ...urban design, connections and infrastructure, including by third parties... -</p> | <p>Alternative wording proposed (in red):</p> <p>(3) include <i>subdivision</i> and <i>infrastructure</i> design standards to minimise private vehicle use, enable public transport networks to operate, access for emergency services and recognise the accessibility needs of the community, including the mobility impaired, the elderly and children,</p> <p>(2) allows business, emergency services and other non-residential activities to meet the needs of communities in appropriate locations,</p> <p>(7) facilitate multi-agency involvement of the current community and respond to the reasonably foreseeable needs of future communities, and</p> |

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| | | from FENZ perspective this would ideally involve consideration of emergency services accessibility, water supplies to assist firefighting and land for fire station resources. | |
| <p>Theme: urban development, planning considerations</p> <p>References on pages 72, 75, 116, 128, 134, 158, 186-7, 190-1, 194-7.</p> <p>CE-M4 – District plans (1)</p> <p>LF-VM-M3 – Community involvement (4)</p> <p>LF-FW-M7 – District plans (3)</p> <p>UFD-O4 – Development in rural areas (3)</p> | Support | <p>Context on p72, fourth paragraph – Example of adverse impacts on existing residents, business and wider society are that planning considerations need to take account of water supplies for firefighting, accessibility for emergency services.</p> <p>Social (p75) – appropriate freshwater supply being available as part of planned urban growth – FENZ view that this includes available water for firefighting.</p> <p>CE-M4 – District plans (1) (p115) – as above, consideration around subdivision forms includes sufficient access for emergency services and water supplies for firefighting.</p> <p>LF-VM-M3 – Community involvement (4) (p128) – We would look to have two-way engagement over relevant <u>guidelines, codes of practice</u> in areas that affect FENZ, although this is more likely done at our national level.</p> <p>LF-FW-M7 – District plans (3) (p134) – FENZ would like “water sensitive urban design techniques” to consider firefighting water supplies when managing subdivision, use or development of land.</p> <p>UFD-O4 – Development in rural areas (3) (p187) - FENZ would like to have input into</p> | <p>FENZ would like to endorse the references in this column and seek to be involved in consideration of what is safe, suitable, and appropriate development from the emergency services/fire perspective. This perspective includes accessibility for fire appliances, availability of firefighting water supplies, sufficient escape routes for residents, and natural hazard risk assessment to consider wildfire risk.</p> |

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| <p>UFD-P8 – Rural lifestyle and rural residential zones (1) and (5)(b)</p> <p>UFD-E1 – Explanation (p194)</p> <p>Pages 195-197</p> | | <p>what is deemed to be "suitable" for expansion/development in terms of our ability to service the community and mitigate fire risk in rural areas.</p> <p>UFD-P8 – Rural lifestyle and rural residential zones (1) (p190) – ready access to services needs to include emergency services.</p> <p>(5)(b) (p191) – noting that water supply can also be used for firefighting purposes – therefore include in impacts and demand when considering suitability of an area for proposed development.</p> <p>UFD-E1 – Explanation (p194) – third paragraph – “consideration of particular locally significant features values and needs that contribute to the attractiveness or uniqueness of the diverse communities, landscapes, and environments of the region.” In parallel, <i>appropriate</i> development should consider risks of development in unique locations such as Mt Iron (Wanaka), where factors such as vulnerability to fire risk, lack of escape routes, emergency services accessibility and sufficient water supplies are important considerations for community safety.</p> <p>UFD-PR1 – <i>Principal reasons</i> also makes reference to considering the community’s <u>wellbeing</u> in the development of urban areas (p195), “suitably-located” rural lifestyle opportunities (p196 and UFD-AER2).</p> | |
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| <p>Theme: air quality, outdoor burning, and public awareness</p> <p>References on pages 104-106</p> <p>AIR-P5 – Managing certain discharges (1) AIR-M2 – Regional plans (2) AIR-M5 – Incentives and other mechanisms (1) (2) (6)</p> | <p>Support</p> | <p>AIR-P5 – Managing certain discharges (1) (p104) – FENZ’s permitting system (https://www.firepermit.nz/ACA/Welcome.aspx) supports and records applications from those wanting a permit to burn outdoors.</p> <p>AIR-M5 – Incentives and other mechanisms (1) (2) (6) (p105) – the Fire and Emergency Act 2017 provides us with the principal objectives to:</p> <ul style="list-style-type: none"> • reduce the incidence of unwanted fires and the associated risk to life and property • protect and preserve life, and prevent or limit injury, damage to property, land, and the environment. <p>Additionally, one of our main functions is promote fire safety. This includes fire safety around the home including fireplaces and chimneys. We endorse the collaborative approach referred to in AIR-M5 around mechanisms and incentives for territorial authorities, iwi authorities, key stakeholders, and industry to achieve (1) and (2) and general support for (6).</p> | <p>Suggestion to link public awareness messages about air quality from regional plans, perhaps as part of provisions in AIR-M2 – Regional plans (2) (p104) with our permitting system and vice versa.</p> <p>Alongside benefits for improved air quality, FENZ seeks to have engagement with territorial authorities (among others) for joint promotions, fire safety messaging (indoor and outdoor), and awareness around home heating efficiency, compliant solid fuel burning appliances and correct installation of those appliances.</p> |
| <p>Note: Additional rows for each separate provision or submission point should be added as required.</p> | | | |