

Christchurch City Council  
53 Hereford Street  
Christchurch Central  
Christchurch  
8013

3 October 2023

Dear Hearing Commissioner

**Fire and Emergency New Zealand – Letter to be tabled for Proposed Heritage Plan Change (PC13) and Proposed Housing and Business Choice Plan Change (PC14)**

Fire and Emergency New Zealand (Fire and Emergency) made a submission on the Proposed Heritage Plan Change (PC13) and Proposed Housing and Business Chouse Plan Change (PC14). Fire and Emergency has opted not to attend the hearings scheduled to commence on 10<sup>th</sup> of October 2023 and requests that, in lieu of attendance, this letter be tabled for the Hearing Commissioners' consideration.

Fire and Emergency raised a number of submission points with respect to heritage, emergency service access, fire fighting water supply and the demand on emergency services.

The s42a report for PC 13 and PC 14 has been received. Fire and Emergency generally support the recommendations from the reporting officer. However, there are some instances where Fire and Emergency still have concerns. These are outlined below.

**Fire and Emergency Response to reporting officers' recommendations.**

**Rule 14.4.2.3 – Building height.**

Fire and Emergency submitted on this provision seeking an exemption from this rule for emergency service facilities, service towers and communications poles.

The reporting officer has accepted this in part but only as so far as it relates to existing lawfully established emergency service facilities.

There are outstanding concerns to Fire and Emergency as any new emergency service facilities developed in the future would not be exempt from the building height within this zone (with the exception of those that have been lawfully established). The height exemptions are important to Fire and Emergency to appropriately provide for the health and safety of the community by enabling efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.

Fire and Emergency therefore request that all Fire Stations, lawfully existing or developed in the future are exempt from this rule.

**Built Form Standard 15.8.2.7 – Water Supply for Fire Fighting**

Fire and Emergency submitted on this standard seeking the replacement of New Zealand Fire Service Commission with Fire and Emergency New Zealand.

This was not addressed in the reporting officers s42a report.

Fire and Emergency therefore request that the standard is amended to correctly reference Fire and Emergency New Zealand.

Yours sincerely

**Lydia Shirley**

Planner

on behalf of

**Beca Limited**

Phone Number: +6433672460

Email: Lydia.Shirley@beca.com