

Submission 6

local resident just submitted the survey PC50 - Rural chapter Survey with the responses below.

Name

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I could gain an advantage in trade competition through this submission

No

The specific provisions of the proposed Plan Change that my submission relates to are as follows

RLZ-S11 (page 120 of 134) - requirements for residential properties on rural lifestyle zone blocks

My submission is that

It is not clear to me from the document whether this regulation applies to new building only, or to all existing residential buildings within the zone. Specifically, the regulations below appear to require that every residential building will have a 38,000 litre water tank and a domestic fire sprinkler system installed.

Is this plan change going to impose this requirement on existing residential buildings when it comes into force? If so, this would impose very significant costs onto homeowners if they are going to be required to retro-fit new water tanks or domestic sprinkler systems to their properties.

What are the implications for owners of residential buildings in the lifestyle block zone that have smaller water tanks and are not fitted with domestic fire sprinkler systems?

Is this going to require people to make changes to their residential homes in accordance with the new plan rules? IF the answer to this is yes, I would strongly oppose this regulation, as:

- * The requirement for the minimum water tank size takes no account of the number of residents living in a property and whether the current capacity is sufficient
- * The requirement to ensure a domestic fire sprinkler system be installed will require expensive modifications to people's homes.

It is an unreasonable cost to impose on private dwellings.

Please could you clarify (in plain english) the scope of this regulation and what it means for people who currently own homes in the area affected by this plan.

RLZ-S11 Water supply and fire fighting sprinkler system for residential units 1.a. b.Each residential unit that is not connected to Council's reticulated water supply must have the following installed: a self-sufficient potable water supply with a minimum volume of 38,000L; and a domestic fire sprinkler system in accordance with NZS 4541:2013 that is connected to a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

I seek the following decision from the local authority

clarification on the requirements for water supply and sprinklers on existing residential homes in the rural lifestyle zoned area.

Please indicate whether you wish to be heard in support of your submission (tick appropriate box)

I do wish to be heard in support of my submission.

please indicate whether you wish to make a joint case at the hearing if others make a similar submission (tick appropriate box)

I do wish to make a joint case.

From: Jason Price <mail@jasonprice.org.uk>
Sent: Wednesday, March 13, 2024 11:37 AM
To: UHCC Planning <UHCC.Planning@uhcc.govt.nz>
Subject: Re: Update on Plan Change 50 - Rural Review

Hello Gabriela

Thanks very much for taking the time to chat and for answering my question a couple of weeks back. Sorry it's taken me a little while to come back with a response.

The answer you gave was very helpful, but I would like to maintain my objection on the basis of this response.

The issue is this:

The requirement to comply with the need to fit domestic sprinkler systems as a requirement of any addition or alteration to an existing building structure is overreach and, in effect, is requiring retro-fitting by the 'back door'. This answer indicates that any building consent for any work to extend or alter an existing property would be declined unless the requirement to incorporate a domestic sprinkler system and a minimum 38,000 litre water tank (as per the FENZ recommendations) were incorporated.

This will impose significant, disproportionate costs and additional requirements on the consent and is simply not appropriate to apply to any alteration request to an existing building.

Following our conversation, I did some outline research on the costs and requirements for fitting such systems. The results (indicatively) showed that for a 3-4 bedroom property:

- * System costs of at least \$5k, and more likely \$10k (potentially more, depending on the property requirements and layout)
- * Installation fees of \$4 - \$6k
- * The requirement for a pump to operate the system, which in the event of power failure (likely in a fire) would then require a diesel generated power supply (likely at least \$5-\$7k)
- * Installation of additional water tank capacity to meet the 38,000 litre requirement. The largest tank available is 30,000 litres, so this would require homeowners with smaller tanks - that are currently sufficient for their domestic water needs - to site and install extra tanks at a cost of \$3-4k, plus plumbing and installation costs.

By proposing rules that require this standard to be met before any building consent will be issued, the council is proposing to add costs in the region of \$20 - 30k to any (even minor) building project - even if the regulations do not require retro-fitting, as originally stated.

This is disingenuous overreach and wholly inappropriate in a cost-of-living and property price crisis. For example, were a family to decide to extend their old villa by an extra room (rather than sell and move house, for example due to the arrival of new children or the need for space to care for an elderly relative), the implication of this policy would mean that the costs of any build would immediately rise by \$30k and their entire property (not just the new build) would be required to have a 38,000 litre domestic sprinkler system to comply.

I understand this is a FENZ recommendation to make up for the time it takes them to attend in rural areas, but this remains a recommendation.

My submission is that this regulation should be explicit in that:

* It does NOT apply to the granting of building consents for additions or alterations to existing properties as a condition of applying for a building consent. Retro-fitting to properties may be **recommended**, but must not be mandated.

* The regulation (if the council wishes to make it mandatory and not a recommendation) should only apply to new build properties, where it is relatively simple to incorporate fitting of a domestic sprinkler system at the time.

For the remainder of properties where none currently exists, it should be a matter for the homeowner to make any upgrades to their property at their discretion, based on personal responsibility and the affordability of solutions based on their economic position. The instances of the number of catastrophic house fires in rural properties are still relatively low, and do not warrant the mandating of this level of costs as a condition of any building consent on properties without domestic sprinkler systems.

This relatively low level of risk is also the purpose of paying (an increasingly expensive amount each year, over and above inflation costs) for domestic insurance policies that include complete rebuild coverage in the event of fire.

It is not for council, through a zoning plan change, to deny reasonable requests to alter or upgrade existing properties by imposing significant additional costs and making “gold-plated retrofitting by the back door” a condition of any new building consent issued to any rural property. If council wishes to mandate fire protection as a requirement, other more reasonable measures should be considered (such as installation of fire extinguishers, which can be made at more reasonable cost).

Many thanks

Jason

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