

LTCCP 2006-16 SUBMISSION

Submissions close on 5 May 2006

I do NOT wish to present my submission at the hearing, and ask that this submission be considered.

I am completing this submission:
On behalf of a group or organisation

Number of people you represent:
>350

My submission refers to:
Full Version of the LTCCP

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96-100
All

I also want to respond to: Development Contributions

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Your Submission:	Do you have any comments on the major projects in our Draft Community Plan?
	286-287 Np, this submission pertains solely to the development contributions policy
	142-147 No, not in this submission.
	224-227 No, not in this submission.
	48-57 No, not in this submission.
	86-87, 147, 170 No, not in this submission.
	96-100 No, not in this submission.
	All No, not in this submission.
	Do you have any comments on groups of activities (The activities and services the Council provides?)
	286-287 Np, this submission pertains solely to the development contributions policy.

**Your Submission
(Cont'd):**

142-147

The LTCCP section on regulatory services provides inadequate detail concerning the allocation of costs, revenues and benefits among the Council's various regulatory activities. The LTCCP should provide assurances that Council is not cross-subsidising services in one regulatory area from revenues gained from activities in another. It should also enable readers to assess whether expenditure levels associated with the various regulatory programmes are well-aligned with perceived risks and benefits to which these activities respond.

The LTCCP fails to identify the key stakeholders associated with its regulatory activities or means of more actively engaging them to achieve desired community outcomes associated with its regulatory activities. For instance, delays processing building consent applications due to inadequate information in applications and supporting documents could be a major problem, which, if actively pursued with design professionals, contractors and homeowners, would shorten the time required to process applications.

The LTCCP emphasises the customer satisfaction and the timeliness of consent reviews, investigations and responses to complaints, but fails to acknowledge the objective (as opposed to subjective) importance of getting the job done right. Council should undertake to measure the performance of its building plan review and building inspection activities more rigorously to ensure that decisions concerning consents are achieving the desired safety and health outcomes. This can be done by working closely with health officials, the Fire Service and other key stakeholders to identify relevant performance indicators.

The LTCCP should make a firm commitment to sustainable urban development by acknowledging the need to take regulatory interventions where necessary to minimise future impacts of unplanned growth, including changes in the City Plan to make it clear what desired community characteristics are sought as development occurs rather than placing the emphasis solely on minimising the undesirable impacts of new development.

In its present form, the City Plan is a blunt instrument, and fails too often to stimulate a shared vision for the city and its environs. As such, the Council should commit fully to constructive engagement of neighbouring territorial authorities, the regional council and development interests to create a shared vision for future growth that does not undermine our community identity, place unreasonable demands on infrastructure, or depend too heavily on ex post interventions to fix problems. This should take precedence over any consideration of a unitary authority structure for Greater Christchurch or Canterbury.

224-227

Council's assessment of its water supply system in the 2006-2016 LTCCP neglects entirely the provision of water for firefighting purposes. This important use of the public water supply system carries with it significant costs and responsibilities for local authorities.

Failure to acknowledge these responsibilities places the Council in a poor position to assess alternative ways of ensuring adequate future provision of water supplies for firefighting. This may, in part, explain why the design of the present reticulation network, particularly the use of submains to delivery water to domestic premises, has made it difficult or impractical to install domestic fire sprinkler systems combined with the normal domestic plumbing in new and existing houses.

**Your Submission
(Cont'd):**

The New Zealand Fire Service has pioneered the development of low-cost fire sprinkler systems for a wide variety of building types, including detached dwellings, to reduce the firefighting water demands on local utility networks. Unfortunately, Christchurch City Council's failure to recognise or adopt the Code of Practice for Fire Fighting Water Supplies (SNZ/PAS 4509), the conflicting need to manage the reticulation network in a way that discourages wasteful consumption, and the resistance to adopting user fees for water consumption have all left Christchurch ill-equipped to employ alternative strategies for managing this major demand on its public water supply infrastructure.

The Fire Service strongly encourages Christchurch City Council to acknowledge its responsibility for making and maintaining adequate provision for firefighting water supply while adopting policies that encourage the use of automatic fire sprinkler systems in buildings as a way of reducing demands on public water supplies.

48-57
No, not in this submission.

86-87, 147, 170
No, not in this submission.

96-100
Council's support for rural fire and civil defence emergency management services should acknowledge the need to maintain a proactive and preventative stance, rather than placing undue emphasis on preparedness and response. Community support entails engaging the community much more actively in risk reduction programmes by encouraging private investment in mitigation, rather than relying on regulatory interventions to achieve socially acceptable minimum levels of safety. This will entail recognising and supporting links not only between these services and Council's regulatory and planning activities, but also by developing stakeholder relationships.

Few city residents realise, for instance, that building regulations emphasise life safety, and provide little assurance that any building will be left standing much less be usable following a fire or major disaster. Voluntary self-regulation to achieve higher levels of safety than those specified in legislation requires information and incentives to succeed. City residents need to become much better informed about the potential impacts of fires and disasters on the community and themselves. This might involve much more detailed studies of the effects of specific hazards on the built-environment and the use of LIMs to notify property owners of the anticipated effects of events even when a development satisfies statutory requirements.

The management of Council's rural fire and civil defence activities should include a strong preventive focus founded upon effective partnerships with emergency services, community groups, civic associations, the business community and central government, whether this occurs under the aegis of the Canterbury CDEM Group or otherwise.

Wherever possible, Council should adopt policies that encourage private investment in risk reduction, such as the installation of automatic fire sprinklers, maintenance of defensible spaces around buildings and development in the urban fringe, and the strengthening of buildings to resist earthquake loads. Incentives to encourage investment in mitigation or risk reduction measures should have a clear strategic focus, such as the preservation of the cultural and architectural heritage of our city necessary to sustain community identity and the local tourism economy. Changes in development contribution policies (addressed elsewhere in the NZFS submission), may also encourage more appropriate private investments in risk reduction going forward, which may in turn reduce public costs of providing and maintaining infrastructure and services to support them.

**Your Submission
(Cont'd):**

Policies aimed at improving information and incentives for reducing risk in the built environment must incorporate consideration of the conflicting or competing demands of urban development and other council objectives. As such, these policies should seek to minimise crossed-signals or Council units working at crossed purposes. This is especially true in respect of inner-city development and growth along the urban fringe. As such, Council may wish to take a more project-oriented approach to managing these important activities during the initial phases where important decisions concerning strategy, policy and direction are involved. This might involve creating cross-functional teams within Council and much more active participation through formal partnerships with key stakeholders to ensure that decisions address both the outcome focus of major development programmes and any unintended consequences associated with their ongoing progress.

96-100 (Cont'd)

Christchurch City Council should make a long-term commitment to improving fire safety in its social housing stock by installing automatic fire sprinklers in all new and substantially renovated domestic dwellings under its ownership. Such investments in Airdale Courts, for instance, have already saved lives and property losses.

Significant fires in Council properties occupied by the elderly and those with special needs have resulted in needless deaths, injuries and property losses in the past that could easily have been avoided through the installation of fire sprinkler systems. With many residents unable to respond promptly to a fire even with early-warning from smoke alarms, it seems ever more important to maintain appropriate protection for those in our community with the greatest need.

The long life-cycle of fire sprinkler systems, their low maintenance costs, and high reliability render them far superior to smoke alarms in achieving safety from fire. Sprinklers are also far less likely to become disabled due to tenant neglect or tampering, rendering them far more likely to achieve the desired outcomes without regular inspection or intervention by Council property managers.

All

The LTCCP section covering Council's democracy and governance services fails to identify any ongoing or dedicated effort to manage stakeholder engagement, particularly among key government agencies and crown agents. The Council seems to rely far too heavily on staff engagement with representatives of these agencies or services on a programme-by-programme rather than a strategic basis. As such, important governance issues have been overlooked in several key areas outlined in other Fire Service submissions.

Do you have any other comments or suggestions you want to make?

286-287

The development contributions policy should give explicit consideration to ways in which a proposed development can reduce future costs on the community. For instance, plans to install fire sprinkler systems in all buildings in a proposed development can significantly reduce the costs of supplying water to meet potential firefighting demands, including increased storage capacity, increased diameter of segments of the reticulation network, and increased costs of accommodating and treating wastewater due to the larger supply capacity of the distribution network. Developers who incorporate fire sprinkler systems into all new buildings, whether or not they are required by the New Zealand Building Code, reduce their impacts on the community in many other ways as well. Street widths and turning radiuses may be reduced and dead-end travel lengths increased if roadways need not accommodate the speedy response of firefighting appliances.

**Your Submission
(Cont'd):**

An explicit recognition of the benefits of such designs for new developments can encourage other measures to conserve energy, water and land, including the recycling of grey water for lawn maintenance or even firefighting, installation of solar water heats to reduce the need for new electricity grid (and land easements to accommodate the transmission lines), and provision of public of common areas for recreation and storm water management.

142-147
No, not in this submission.

224-227
No, not in this submission.

48-57
The Council's strategic directions do not recognise the challenges posed by the city's ageing building stock and ageing residents on fire safety as distinct from natural hazards. Inner-city development has encouraged the unconsented use of a number of buildings for residential purposes inconsistent with their legal status. The lack of a proactive building control programme aimed at identifying and remedying such non-compliant uses has rendered a growing segment of the community at-risk from fire, as evidenced by the Cashel Chambers fire and others.

Council has failed to recognise the Fire Service as a key stakeholder in its efforts to implement the strategic directions associated with strong communities, a healthy environment and a liveable city despite our intimate associations with the activities aligned to these directions and their associated community outcomes. Despite a significant level of active consultation between city officials concerned with emergency management and rural fire, city officials rarely engage the Fire Service actively on questions of urban development and regulation. Too often, Council officers have attempted to foist uncomfortable issues, such as non-compliant buildings onto the Fire Service despite our lack of statutory authority to deal with them, rather than employing the remedies provided by legislation. The Fire Service's repeated attempts to raise these issues with Council staff have resulted in much cordial talk but little constructive action.

86-87, 147, 170
The financial forecasts, revenue projections and proposals for reducing spending and increasing fees fail to identify the individual revenue streams received from building consent, resource consent, building inspection, building warrant of fitness and other regulatory processes. As such, it is difficult, if not impossible, to comment on the reasonableness of Council's approach to managing the delivering of these services in a fiscally responsible fashion.

Anecdotal evidence suggests that Council's approach to managing the safety of the existing built environment has been too passive. This may be due in part to excessive emphasis on timeliness of consent processing and customer satisfaction with service delivery, and too little emphasis on quality outcomes in respect of building safety.

96-100
No, not in this submission.

All
INTRODUCTION: In this and other submissions, the Fire Service comments on a number of Council activities and policies having particular regard to a number of key themes: fiscal accountability, transparency, stakeholder engagement, cross-functional coordination and proactive or preventive focus. These submissions emphasise the need for Council to consider much more critically how it encourages the community to engage its vision and work together to improve our community and the quality of life we enjoy.

**Your Submission
(Cont'd):**

SUMMARY: The LTCCP presents a compelling vision of Christchurch in 10 years' time, but places far too much emphasis on Council's role in achieving it. The LTCCP is a *community* plan, not just a template for successive annual expenditure plans. As such, it should explain how Council intends to engage the community in achieving community outcomes. The failure to identify how a key stakeholder like the Fire Service figures in such important strategic directions as strong communities, a healthy environment and a liveable city begs the question how the City Council expects to succeed if it persists in going it alone.

CONCLUSION: The Fire Service has expressed concerns that Council's programmes remain too poorly coordinated, and lack sufficient future focus to ensure community outcomes are achieved. Performance indicators and fiscal alignment often prevent worthwhile assessments of the contributions specific programmes or services yield toward achieving community outcomes or implementing the strategic directions required to achieve them. This shortcoming extends to relatively cursory consideration of how Council can use its relationships with stakeholder to achieve its vision in specific areas of responsibility.