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May 10, 2025

Long Term Plan Submissions
Marlborough District Council

Dear Councillors,

Development Contributions

I would like to take the opportunity on behalf of Fire and Emergency New Zealand (**FENZ**) to comment on the proposed Long Term Plan for Marlborough District Council.

Fire and Emergency New Zealand

FENZ is a crown entity constituted under the Fire and Emergency New Zealand Act 2017. It is responsible for providing fire prevention, firefighting, hazardous substance incident response, vehicle extrication and urban search and rescue services to New Zealand communities 24 hours a day, 365 days a year. FENZ also has a number of additional functions, including responding to medical emergencies, maritime emergencies, and natural disasters.

The effective location of Fire and Emergency New Zealand stations

FENZ has a strong focus on communities and being active and visible within those communities. To do this FENZ necessarily has premises across the country - FENZ currently maintains 637 fire stations across New Zealand. Where there is development within a region, FENZ, like a Council, needs to consider whether its existing infrastructure is sufficient to support the growing community. FENZ uses a National Risk Resource Model to profile areas within New Zealand to determine station placement. The model includes tools to balance the fire risk profile of structures with address location. FENZ also takes into account council's development plans for expansion and roading improvements.

Development contribution exemption

FENZ considers that its developments should be exempt from development contributions because they provide a public utility and also because they generate a negligible additional demand for network infrastructure and no demand for reserves.

FENZ stations provide a public utility throughout the Marlborough District

Where FENZ has premises within its communities this contributes to public safety by building resilience within that community as well as providing a more rapid response in the event of an incident, whether that is fire, a natural disaster or a traffic accident. With all of these incidents, FENZ ability to get to the location in a timely way is key to the outcomes for the community. FENZ has a target response time in an urban area of 8 minutes for a career crew and 11 minutes for a volunteer crew. This can only be met where there is the necessary infrastructure.

FENZ stations generate negligible additional demand for network infrastructure and no demand for reserves

FENZ has a 25-year capital works program which includes the construction of over 50 new stations across New Zealand. A standard station will have a floor area of around 730m² on a site of at least 3,000m². Generally, the largest component of a FENZ premises is for garaging of vehicles and equipment storage. This means that a

FENZ premises does not have a large impact on the surrounding area and creates very little demand for network infrastructure and no demand for reserves. Further, generally FENZ developments are to replace obsolete or poorly located facilities within the area. This means that one asset is being replaced by another and accordingly the total demand for infrastructure within an area is not being increased, rather relocated.

The low impact and public utility of FENZ premises means that it would not be a fair, equitable and proportionate for FENZ to pay development contributions in line with other types of developments. This is especially so in the case of contributions towards reserves.

I do not need to appear to speak to my submission before the Marlborough District Council, however if you have any questions I would be happy to discuss as required.

Regards,

Zoë Genet
Solicitor