

15 May 2025

The Policy Team - Plan Change 1  
Dunedin City Council  
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Dunedin

## **PRESENTATION MATERIAL FOR PLAN CHANGE 1 SUBMISSION FIRE AND EMERGENCY NEW ZEALAND**

In December 2024, Fire and Emergency New Zealand (**Fire and Emergency**) made a submission on Dunedin City Council's (the **Council's**) proposed Plan Change 1 (PC1) opposing the proposed heritage protection provisions for Lookout Point Fire Station (the **Station**). PC1 is intended to implement changes to the Partially Operative Dunedin City Second Generation District Plan (2GP).

The material provided in this information bundle is intended to support the original submission provided by Fire and Emergency. This material will be presented to the Plan Change 1 panel at the hearing schedule for Tuesday the 20<sup>th</sup> May 2025.

The following information is attached to this presentation document-

- Original submission by Fire and Emergency.
- Letter from DCC advising of earthquake prone status.
- Detailed Seismic Assessment for the buildings at the Lookout Point facility.
- Concept development plan for 182-184 Mornington Road.
- Certificate of Compliance COC-2024-9.

### **Background to Submission**

The Fire and Emergency submission seeks the rejection of the PC1 heritage protection provisions proposed as Scheduled Heritage Building BX117, which relate to Lookout Point Fire Station. Fire and Emergency requests that the Scheduled Heritage Building BX117 feature be removed from PC1, including from the Planning Maps.

The reasons for this position are-

1. Fire and Emergency is subject to legal requirements to provide a high standard emergency response capability. To meet these requirements, Fire and Emergency needs to be able to upgrade its facilities, including its fire station buildings, to enable the service to remain fit-for-purpose. Over the last several years, Fire and Emergency has recognised a need to upgrade the facility at 182-184 Mornington Road and has embarked on a significant amount of investigation and design works to determine the most appropriate form of these upgrades. Several options are still being explored; however, it appears likely that, at the very least, some reasonably substantial modification of the existing building will be necessary. The principal concern held

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by Fire and Emergency is that the proposed heritage protection provisions will prevent the facility being able to be upgraded to the standard required for an emergency response operation.

2. Fire and Emergency disagrees with the heritage assessment undertaken by Dunedin City Council. It is Fire and Emergency's opinion that Lookout Point Fire Station buildings do not possess the heritage values necessary to warrant the proposed protection.

## **Discussion on Emergency Response Standards**

Fire and Emergency has a wide range of statutory functions, which are set out in sections 11 and 12 of the Fire and Emergency Act New Zealand 2017 (the **Act**). Fire and Emergency's main functions include providing fire prevention, response, and suppression services, rendering safe hazardous substance incidents, rescuing people that are trapped as the result of transport accidents and other incidents, and providing urban search and rescue operations. Fire and Emergency is also expected to assist in additional matters to the extent that it has the capability and capacity to do so. These matters include responding to medical emergencies and maritime incidents, performing rescues, providing assistance at transport accidents, and responding to weather related events and natural hazards.

To comply with its main functions and ensure it has capability and capacity to assist with additional matters, Fire and Emergency must have fit-for-purpose assets in the right locations. Lookout Point Fire Station houses a pump rescue tender (PRT) appliance, which enables a full response service for a variety of emergencies in the local area and beyond, including fires, medical emergencies, motor vehicle accidents, search and rescue, and civil defence and natural disaster responses. However, the Station requires significant upgrades to ensure that it remains operationally functional and in a condition that enables Fire and Emergency to continue to respond to emergencies, serve the local community, and administer its statutory functions. Designating the building with a heritage status would limit what upgrades can be undertaken and could ultimately result in Lookout Point Fire Station becoming a redundant asset. Furthermore, if the required upgrades cannot be completed, the Station may need to be relocated, which would impact response times.

Fire and Emergency has real concerns that designating Lookout Point Fire Station with a heritage status would significantly interfere with its ability to effectively administer its statutory functions and provide life-saving services to the local and wider communities that the Station supports.

## **Earthquake-prone building**

In March 2023, the Council wrote to Fire and Emergency to advise that Lookout Point Fire Station is earthquake-prone under section 133AB and 133AK of the Building Act 2004. The earthquake rating for the building was assessed at that time as being 22% (NBS).

The fact that the building was identified as being earthquake-prone was not a surprise to Fire and Emergency. This is consistent with an earthquake assessment that Fire and Emergency itself commissioned in 2013 in respect to the Station. Current earthquake prone building legislation directs that all operational facilities, such as fire stations, that provide post-disaster functions must be strengthened to meet at least 34% NBS for Importance Level 4 (IL4). Fire and Emergency is progressively upgrading its nationwide portfolio to meet this requirement. The Lookout Point Fire Station is included in the buildings to seismically address.

The Aurecon assessment provides several recommended upgrade options to improve the current NBS rating of the building. These options comprise of a range of reasonably extensive renovations, and include-

- Providing new reinforced concrete walls, from foundation to roof, to several of the external walls of the buildings.
- Removal of brick chimneys.
- Multiple internal wall upgrades and internal bracing.
- Possible demolition of large portions of the building (as an alternative to reinforcing these).

The extent of the required earthquake strengthening works is significant and it is expected to be costly. For context, Fire and Emergency has close to 150 earthquake prone buildings in its portfolio, so is having to carefully plan and programme a progressive approach to strengthening its buildings in a financially sustainable way. As such, no significant strengthening works have been undertaken at Lookout Point Fire Station since the report was completed in 2013, however, as referenced earlier, the Station is included in the buildings to seismically address in the future within the legislative timeframe.

### **Required Upgrades to the Station**

In addition to the seismic considerations, Lookout Point Fire Station requires significant upgrades to enable it to continue to provide the required level of service in a modern emergency response environment. A good example of this is the changing size and shape of fire-fighting appliances, which are now significantly larger than they were when the Station was first built. The new appliances do not easily navigate the building's appliance bay doorway into the Station. To rectify this limitation of the facility, Fire and Emergency has determined a need to replace the existing appliance bay doorway with a larger frame and door panel, and to increase the height, width and length of the internal bay itself. Furthermore, there is a functional need to provide additional appliance bays within the facility as a single bay is not currently able to provide the modern level of service required by the community.

To better understand the extent to which a broad upgrade of the facility might be advanced, Fire and Emergency has commissioned the assessment of several design options. One of the resulting renovation concepts (developed in March 2023) is attached to this information bundle. This is not the only design that is being investigated, but this concept does provide a particularly useful example that demonstrates what a functional, modern emergency response facility on this site could look like.

In the interest of prudent financial decision-making, given the quantum of works required at the current facility, there could be an economic case to consider replacing the entire facility with a new modern facility. In this option, the existing buildings would be fully removed from the site, and a large, two-winged building would be erected in a central location. The obvious benefit of a new facility is that it can include all the infrastructure necessary for Fire and Emergency to operate a modern station, including a large appliance bay and resource garage for housing and maintaining PRT appliances, operation and training areas, accommodation for staff that are stationed on-site, and kitchen and meeting rooms. This option will provide a fully functional emergency response station that will enable Fire and Emergency to provide a high level of service to the local community, while also supporting the wider needs of the city.

If retention of the existing building envelope was to become necessary, as intended by the proposed PC1 heritage protection changes, it would not be possible for Fire and Emergency to realise the service improvements that could be gained through a comprehensive renovation of the facility. Not only would

Fire and Emergency be unable to upgrade the facility to a modern emergency response service, but it would also potentially be unable to even undertake the earthquake strengthening required to meet the minimum NBS requirements. This outcome would significantly disrupt the ability for Fire and Emergency to effectively administer its statutory functions and to provide the life-saving services that people rely on in the local and wider area.

### **Relocation of the Facility**

A natural question that the panel might seek some discussion on is whether Fire and Emergency has given any consideration to relocating Lookout Point Fire Station facility to a new site, and whether, if this option was to be pursued, the proposed heritage provisions would support retention of the Station's exterior structures during any future private redevelopment that might be undertaken by others.

Fire and Emergency has given thought to the possibility of relocating the facility; however, this is far from the preferred option for providing an appropriate level of emergency response service. As noted above, over recent years Fire and Emergency has been considering various enhancement options for Lookout Point Fire Station facility (this was started well before PC1 was notified and a large investment has been made into this work). The possibility of relocating from the property at 182-184 Mornington Road to a new location does not rate highly, for the following reasons-

- Large capital investment to purchase a new site, with uncertainty around what income the existing site might recover when sold.
- The new site would need to be located within the local Lookout Point neighbourhood to ensure that response drive-times throughout the response network are maintained. This limits the options available for a suitable site.
- Land acquisition can be an uncertain, problematic and time-consuming process.
- Resource consent processes to establish a new facility (and for managing any effects of the activity, such as traffic, noise, etc., within a residential environment), can likewise be an uncertain, problematic, and time-consuming process.

Accordingly, it is highly unlikely that Fire and Emergency will embark on a redevelopment pathway that involves relocating Lookout Point Fire Station facility from its present home at 182-184 Mornington Road.

### **Discussion on Heritage Values**

To date, Fire and Emergency has not commissioned its own heritage assessment of the buildings at 182-184 Mornington Road, although could consider this in due course.

It is the unqualified position of Fire and Emergency that Lookout Point Fire Station does not possess the heritage values necessary to warrant the proposed protection. Fire and Emergency acknowledges that this building does possess a certain degree of community amenity, being located on a prominently visible site and having been built for the specific purpose of providing an emergency response function. However, Fire and Emergency feel strongly that there is a meaningful distinction between the Station as a community amenity feature and the Station as a heritage feature.

The Council's heritage assessment of Lookout Point Fire Station suggests that the Station is of significant heritage, citing two reasons:

- Its historical/social values; and

- Its design values.

### Historical/ Social Values

The noted historical/social values relate to the Station's *association with the development of suburban fire stations in the 1950s to meet the needs of the city as it expanded.*

Fire and Emergency is opposed to the idea that the building might be considered to have a significant level of heritage on the basis that it was originally built to service a functional need of Fire and Emergency's Brigades. Given most of the sites occupied by Fire and Emergency around the country are purpose built by Fire and Emergency themselves (or a previous iteration of FENZ), this is a concerning matter for Fire and Emergency, as it could have implications and possibly set a precedent for other existing facilities around the district and potentially the country, and for future facilities that are yet to be established. Fire and Emergency categorically does not support the idea that fire stations are considered to have heritage values, simply because they are fire stations.

### Design Values

Regarding the design element of the heritage assessment, Council's report notes that the Station *has architectural significance as a Moderne-style design by prominent Dunedin architectural practice Mandeno, Fraser and Galbraith. Mandeni and Fraser were responsible for the 1931 Central Fire Station (a Category 2 historic place), and the former Roslyn Fire Station (1950).* Fire and Emergency does not dispute who designed the Station nor the era that it was designed in, however, Fire and Emergency considers that the values attached to the design of the Station are not sufficient to outweigh the need for the property to be renovated to best serve the functional requirements of the organisation.

Furthermore, other examples of the Mandeno, Fraser and Galbraith design style exist within the city, so should the decision be made to demolish and rebuild Lookout Point Fire Station, the design style will not be lost in the city. In particular, the Central Fire Station is already protected as a Category 2 historic place.

It is also relevant to note that there does not appear to be any heritage protection over the former Roslyn Fire Station building at 50 City Road (now held in private ownership). Nor has this building been proposed to have a heritage protection status applied under PC1, despite being in what would appear to be a similar condition as Lookout Point Fire Station. Whilst Fire and Emergency is not advocating for this to be included, it does present an inconsistency in the heritage assessment processes for PC1, and Fire and Emergency would like to better understand the reasoning behind Council's decision to promote a heritage protection at one site and not the other.

Overall, Fire and Emergency does not agree with the heritage assessment undertaken by Council. Fire and Emergency does recognise that the Station provides a community amenity value, however, is of the opinion that this itself does not extend to becoming a significant heritage value.

### **Certificate of Compliance**

It is also worth noting that Fire and Emergency has recently obtained a Certificate of Compliance (COC-2024-9) from Dunedin City Council for the demolition of Lookout Point Fire Station. This certificate is valid to 21 August 2029 and permits Fire and Emergency to remove the buildings on the property at any

point until the specified lapse date, irrespective of whether the building is PC1 heritage protected. This presents a further inconsistency with this heritage protection process.

## **Conclusion**

Fire and Emergency has raised several concerns in this submission in respect to the heritage protection provisions proposed by PC1.

Fire and Emergency does not agree with the heritage assessment undertaken by Council. Fire and Emergency does recognise that the Station provides a community amenity value, however, is of the opinion that this itself does not extend to becoming a significant heritage value.

The PC1 proposal will place Fire and Emergency in a detrimental position when considering options for addressing the extensive works required on the Lookout Point site, and Fire and Emergency believes the community amenity value can be maintained without the heritage protection. For instance, a well-designed replacement emergency response facility is expected to be able to offer a community amenity value of a similar, if not higher, quality.

I trust that this information is helpful. We look forward to presenting this position to the panel next week.

Yours faithfully  
**PATERSONS**



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