

Public Participation

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14 January 1977

Mr R.H. Mills,  
Chief Fire Officer,  
New Zealand Fire Service,  
Central Fire Station,  
Oriental Parade,  
WELLINGTON.

Dear Sir,

re: PROPOSED MALLS - MANNERS AND LOWER CUBA STREETS

Further to your letter addressed to the Town Clerk of 21 December 1976, it was very good of you to meet Mary Buckland and myself yesterday to discuss the proposed malls in Manners and Lower Cuba Streets.

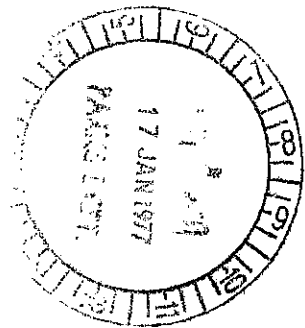
I trust that our explanation of the proposal, particularly traffic routing, to some extent reduced some of the fears you had about possible access to the Terrace for your fire vehicles.

In the light of the information we obtained yesterday, sketch plans will now be prepared of the proposals for the mall areas and Mrs Buckland will arrange to discuss these with you on your return from overseas.

Yours faithfully,

*K.V. Clarke.*

K.V. Clarke,  
CITY PLANNER.



COPY FILED  
*Mary Buckland*

*Parks Dept*

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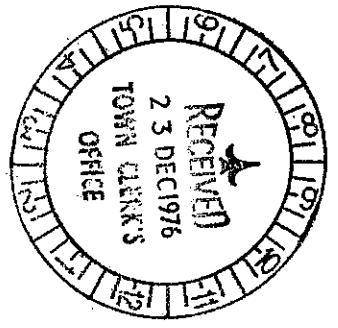
NEW ZEALAND FIRE SERVICE

Wellington Fire Brigade,  
Central Fire Station, 2-38 Oriental Parade,  
Wellington, New Zealand Telephone 850-188

FOR ENQUIRIES PLEASE TELEPHONE  
MR MILLS ..... 51  
850-188 EXT

21st December, 1976.

Mr. I. McCutcheon,  
Town Clerk,  
Wellington City Corporation,  
P.O. Box 2199,  
WELLINGTON.



Dear Sir,  
re: Proposed Mall - Manners Street.

With regard to the above reference, I have taken note of newspaper items which indicate plans are going ahead for a Mall to be constructed in the Manners Street area.

It is obvious from the Fire Service point of view that access through Manners Street to the Terrace, via Boulcott Street, is a main arterial route for our fire appliances. We have not been requested by any committee or organisation as to our requirements for access through, or indeed, to buildings within the Mall area itself.

You are aware we have always been most concerned with access to buildings for fire fighting purposes in the Cuba Street Mall and fortunately were able to come to compromise arrangements which appear to have given us reasonable access to this area. However, I would point out that there could possibly never ever be any speedy movement through the Cuba Mall if it was ever to be used as an access route to other areas.

Our deep concern is, should a similar type of Mall be envisaged for Manners Street, a time delay in having to circumnavigate what has been accepted as our main route to the Terrace and its high rise building problems would occur and would severely hamper our progress to the fireground.

I await any information and would be prepared, at short notice, to meet any persons for discussions that would help to come to some mutual agreement covering these plans.

Yours faithfully,

*R. A. Mills*

R.H. MILLS,  
Chief Fire Officer.

RHM:SMA

*Approved  
12.12.76*

*copy to Mayor*

*copy (Mills)*

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RECORDS - copy/copies  
Please deliver  
with the index notes from  
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35/1678

MISSIONS TO WELLINGTON CITY COUNCIL NON-STATUTORY PUBLIC MEETING TO BE HELD IN THE CONCERT CHAMBERS, TOWN HALL, CUBA STREET, RELATING TO THE PROPOSED PEDESTRIAN MALLS IN CUBA AND MANNERS STREETS, FROM THE WELLINGTON FIRE BRIGADE, AREA 4A/1, NEW ZEALAND FIRE SERVICE

#### INTRODUCTION

Your Worship, Honourable Members of the Council, I thank you for the opportunity to make submissions in this matter.

Before I commence, however, I would point out that I am unaware of the experience or qualifications in respect to fires and fire-fighting operations of the advocates for the introduction of Malls of the type proposed for Manners Street and as exist at present in Cuba Street.

I am nevertheless aware that the collective experience of the Executive Officers of the Wellington Fire Brigade in the sphere of firefighting, rescue, damage control and fire safety is in excess of 80 years.

In terms of academic qualifications they hold Diplomas in Fire Engineering and Fire Technology of the New Zealand Brigades Institute, the Institution of Fire Engineers (Great Britain) a B.Sc. Degree (Victoria University) and a Masters Degree in Fire Engineering (Edinburgh University).

To qualify for the posts they hold in the New Zealand Fire Service they must have had training in, and extensive knowledge of fire fighting in high-risk areas, including highrise buildings, port installations, airports and fires in ships. They must also have a sound knowledge of fire brigade administration and organisation, Fire Service legislation, Fire Prevention, personnel training and all facets of operational duties commensurate with a large metropolitan Brigade.

Academic qualifications are however only a part of their credentials. Their real expertise comes from personal experience and involvement with facing major conflagrations, in the city of Wellington over several decades. Decades which contained many of this cities major fires.

It is because of this practical experience that I believe we can speak with some authority on the folly of proceeding with such a proposal as the Cuba/Manners Street Malls.

Fire Services Act 1975, Section 28 sub-section (4), deals with the function, duties and powers of a Chief Fire Officer.

(Section 28 of the Fire Services Act 1975 is attached)

These powers ladies and gentlemen, are very far reaching and indeed there are very few legislative Acts which do have such sweeping powers and those that do are primarily designed to deal with emergency situations and the conservation of Public Safety.

It would be relevant to ask therefore why the legislators deemed it so necessary to give such extreme power. The answer is ladies and gentlemen to quote the operative word in the Act. It MAY be necessary to carry out those functions.

Part II of the Fire Services Act 1975 tells us that it is a matter of prime importance for the Commission to take an active and co-ordinating role in the promotion of fire safety in New Zealand. To seek continuously for new ways to reduce the incidence of fire and the risk to life and property from fire and to ensure unimpeded means of escape in the event of fire.

To have such legislation on one hand and such a proposal as is mooted on the other is a paradoxical situation and would be ludicrous if it were not so potentially dangerous.

The submission will be presented in four major sections, namely:-

1. Access for Appliances.
2. Existing Buildings in Vicinity of Proposed Mall.
3. Problems associated with Fire Fighting.
4. Town Centre Redevelopment.

1. ACCESS FOR APPLIANCES:

The Fire Services Act requires that the Fire Brigade proceed forthwith to an alarm of fire by the quickest means possible because fire has an appetite that consumes life and property at an alarming rate. It is not an overstatement to claim that seconds count.

But how, I ask you, are we to respond as quickly as possible to an incident when such obstructions as planter boxes, trees, seating, water features, etc, are to be placed in the way.

To expedite the rescue of persons from the upper floors of buildings and to facilitate firefighting operations aerial appliances must be strategically positioned. It must be stressed however that it is impossible to predetermine the exact location that any appliance can work most effectively from.

To place obstructions in an already narrow street lined with a range of multi-storey and in some cases interconnected buildings that are not constructed to modern fire resisting and fire safety standards, premises that are used for a multitude of commercial activities and as places of public assembly, is courting disaster.

It is strategically important that Manners Street remain free to allow direct access to Boulcott Street, as the size of some appliances requires this.

At peak hours, the present congestion caused by the combination of heavy traffic flows and narrow streets in this area causes severe problems. By reducing the available streets, and further congesting the traffic, it will become virtually impossible at peak hours to approach this area quickly - a very necessary requirement if successful firefighting is to be carried out.

2. EXISTING BUILDINGS IN VICINITY OF PROPOSED MALL:

The Manners Street, Cuba Street area where the proposed Malls are to be introduced, contain a range of multi storey, and in some cases interconnected, buildings of older type construction. These premises are used for a wide range of commercial activities, and because of their design, age and usage, have little or no built in fire protection.

In addition, there are two, new multi-storey buildings in Manners Street, with the special problems associated with tall buildings.

The buildings in the area of the proposed Malls do not generally comply with present day building standards, particularly as regards fire safety. As well, additional problems during a fire situation have been introduced as a result of changes of occupancy, the chance of uncontrolled fire has been increased.

If a fire occurs, there is a very real danger of it developing into a large one in this area. The only hope of preventing this is quick brigade access, and fast strike. Work at the Fire Research Station in the U.K. has shown that positive results in fire fighting are directly correlated with the attendance time of the first appliance, introduction of Malls will increase this time and accordingly reduce the effectiveness of fire fighting operations.

The introduction of Malls within the area would make the existing situation worse, as the chances of fire occurring would not decrease, but the chances of them becoming large would increase.

Some of the older buildings in this area have walls of brick, therefore there is a real possibility in an earthquake situation of collapse and uncontrolled fire involving a whole block. The restrictions placed by plants, fountains, and other adjuncts to the mall could ensure that the street became impassible, even if the rubble from an earthquake had not done this.

3. PROBLEMS ASSOCIATED WITH FIREFIGHTING:

We realise that it is difficult when standing in Manners Street on a warm spring morning to envisage a holocaust, a major conflagration engulfing the street, just the same as we understand that it would be difficult to imagine on the same warm calm spring morning that the tranquil waters of Wellington Harbour could be whipped up by cyclonic disturbances to a condition of awesome violence and great turbulence.

And yet as you are all aware this can happen and has happened here as witnessed on April 10th 1968 when the modern Lyttelton-Wellington ferry the T.E.V. Wahine, a vessel of almost 9000 gross tons, foundered in the harbour east of Steeple Rock Light with a loss of 51 lives.

To further illustrate my point I would like to produce as evidence photograph of a shopping complex in another New Zealand city, the construction of which was similar to many found throughout the country at that time. Who could believe when looking at that tranquil scene that it could become a raging inferno in the middle of a working day.

This holocaust, your Worship, Honourable Councillors claimed the lives of 41 persons, right here in our own country. This tragedy in fact resulted in major changes to our fire legislation and a subsequent upgrading of firefighting resources and manpower and indirectly is responsible for me being here to warn you of the potential dangers associated with shopping malls.

Who would believe that a simple architectural design, an aesthetically pleasing feature such as a sloping verandah roof would render normal fire brigade ladders of the period virtually useless on premises which are classified today as a low-rise building, a structure of only three floors, with tragic consequences.

A simple architectural feature contributing to the loss of 41 lives - who would have thought of it. The Fire Brigade is not opposed to the concept of Malls if they are built for that specific purpose, indeed we applaud any effort to brighten up our city, but it does

have a moral obligation as well as a legal responsibility under the Fire Services Act 1975 to bring to your attention the inherent dangers and possible fatal consequences associated with a proposal which alters a narrow mid city street into what is labeled a Mall.

It is almost physically impossible for the layman who has not experienced fire to imagine that vast amount of thick volumes of toxic smoke and gases which can accumulate even in the open street at a major fire but my colleagues and myself have on occasions had to resort to self-contained breathing apparatus in the open air, in the street, to survive. I have said that it is almost impossible but I would ask you to try and envisage the scene with scores of the public discharging from department stores, theatres, restaurants, and shops into the already congested Mall and the panic it could create. Panic which in itself is an indiscriminate killer.

Imagine also large unwieldy fire appliances endeavouring to negotiate their way through the smoke and crashing into the obscured obstructions. Tell me, where we are going to put all the ambulances and ancillary vehicles that are an essential part of operations? Tell me, how I am to solve the logistical problems associated with rescuing trapped persons and treating injured victims, how to ensure uninterrupted essential water supplies?

The Hannah's Building fire (of which I provide photographic evidence) was a major incident involving multiple rescues and firefighting which occurred last year. It should be noted while looking at the scene that there are seven major fire appliances, two control cars, and two ambulances as well as a spaghetti like multitude of hose in view. This however is not the whole picture and does not show all the vehicles involved which totalled seventeen fire brigade vehicles not including vehicles from other essential services such as Police, Ambulance, Ministry of Transport, M.F.D., Waterworks, etc.

The width of the street at this point measures 16 metres as against the 10 metres of Manners Street. It does not need much imagination to envisage the congestion which would be caused if a similar emergency occurred in the much narrower street, without the



constructions proposed. It should also be noted that the present access for firefighting purposes is already restricted and that the rear access to many of the premises is limited or non-existent.

It is recognised overseas as well as in New Zealand that the Wellington Brigade is an efficient firefighting force well equipped with modern firefighting apparatus. Indeed some of the people responsible for the Brigade achieving this standard are members of this very Council and I refer to Councillor Spry, immediate past chairman of the Wellington Fire Board

and even his Worship, Mayor Fowler himself. All I ask now is that this progress and efficiency so hard won over many years is not negated by taking away another street, of which there is already a shortage in the central city area, a street which gives ready access to many other vulnerable parts of the city, or inhibiting the operational efficiency of appliances by restricting their manoeuvrability in the mall itself.

#### 4. TOWN CENTRE REDEVELOPMENT:

A viable alternative to the introduction of pedestrian Malls is that developed overseas - the Town Centre Redevelopment. This is a total concept - where all factors are totally integrated at the design stage - unlike the proposed Mall which is only a partial project. Malls reduce the access for vehicles, but because of the constraints, increase the risks for property owners, and to users in other ways - is it worth it?

With proper, planned town centre redevelopment there is a planned approach to the whole problem, not just a facet of it. The introduction of Malls tends to provide a facade over reality. With total integration at the drawing board it is possible to provide for all needs - access for vehicles to both lower and upper levels, access and egress for people, provision of proper in-built fire fighting equipment and safeguards, removing the problems associated with older and substandard buildings because they are demolished to make way for the new development.

The construction of pedestrian Malls is an attempt to achieve something cheaply; but in so doing, ignoring other important factors. If life safety measures are reduced in one way, as they are if fire fighting efficiency is reduced - there must be some form of compensating increase in other safety factors, as it is totally unreasonable that people should be put at greater risk because of the introduction of a concept - in this case Malls. Unless there is a total design concept, as in the Town Centre Redevelopment, this is not so. Surely, there is a need in the older parts of the city for an increase in safety features, not a decrease as is planned with the introduction of these Malls.

There must be total integration of all relevant factors at the design stage. It is not feasible, or economical, to produce realistic results piecemeal, unless a total design has been done, and the project completed in stages.

CONCLUSION

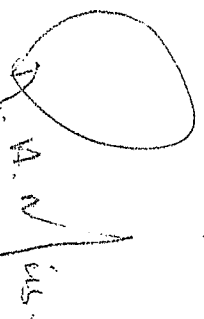
Ladies and gentlemen, I would like to conclude my submission with another analogy and that is if we are so concerned with the aesthetic features of Wellington at the expense of all else why don't we plant pohutakawa trees on the grass verges at Wellington Airport and place planter boxes along the edges of the runways. I am being facetious you may say and you are right, for imagine the outcry from the Airline Pilots Association and the Department of Civil Aviation if such a proposal were even suggested.

And why would there be such an outcry? The answer is for the simple reason that it is dangerous and contravenes basic safety regulations (the height of the drill tower at Kilbirnie Fire Station was severely restricted because of its proximity to the Airport, which is some hundred odd metres away)

Is it too much to expect the same concern for the safety of the people of Wellington City? Should not the same safety margins that exist for airline passengers be extended to our citizens using all the places of public assembly such as theatres, restaurants, and department stores which discharge into the proposed Mall?

Remember too that the planter boxes I suggested for the airport were to be placed at the sides of the runway not in the middle as will be the case in the Mall.

I implore you therefore not to inhibit the efficient mobilisation and operation of your Fire Service by placing obstructions of any sort in an narrow street such as Manners Street which also gives ready access to many other vulnerable parts of the City.



R.H. Mills  
CHIEF FIRE OFFICER  
CITY OF WELLINGTON FIRE BRIGADE