

Form 21

Submission on Notice of Requirement D190064 – Kirwee Recreation Reserve – Selwyn District Council

To: Selwyn District Council

Submission on: Notice of Requirement D190064 to extend the designation for the Kirwee Recreation Reserve

Name of submitter: Fire and Emergency New Zealand (FENZ)

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This is a submission on behalf of Fire and Emergency New Zealand (FENZ) concerning the proposed extension of the designation for the Kirwee Recreation Reserve.

The Fire and Emergency New Zealand Act 2017 (FENZ Act) established FENZ from 1 July 2017. FENZ was created from the previous New Zealand Fire Service Commission, the New Zealand Fire Service, the National Rural Fire Authority, and 38 other Rural Fire Authorities. The FENZ Act, among other matters, replaced the two previous governing Acts (the Fire Service Act 1975 and the Forest and Rural Fires Act 1977) to create a single, unified fire and emergency services organisation for New Zealand. The FENZ Act establishes the governance, management and operational arrangements for protecting life, property and the environment from fire and other emergencies in New Zealand.

FENZ recognises the importance of the proposed extension to the existing designation in providing for recreational facilities within the Selwyn District.

The purpose of the Resource Management Act 1991 (RMA) is to promote the sustainable management of natural and physical resources, which includes enabling people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while (amongst other things) avoiding, remedying, or mitigating any adverse effects of activities on the environment. In that context, the risk of fire represents a potential adverse effect of low probability but high potential impact. FENZ's principal objective under the FENZ Act is to reduce the incidence of unwanted fire and the associated risk to life, property and the environment. As such, FENZ monitors notified resource consents and notices of requirement to ensure that, where necessary, appropriate consideration is given to fire safety matters.

FENZ's role includes promoting fire safety and fire prevention, and extinguishing fires.

Adequate water supply and access for firefighting activities:

The provision of adequate firefighting water supply and effective firefighting access to that water and property that may be affected by fire is critical. It is important to FENZ that any land use that does not have access to a reticulated water supply has access to an alternative, adequate firefighting water supply of some kind. This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community and enable the avoidance or mitigation of the adverse effects of fire, and therefore achieve the purpose of the RMA.

The New Zealand Firefighting Code of Practice SNZ/PAS 4509:2008 (Code of Practice) is a non-mandatory New Zealand Standard that sets out requirements for firefighting water supplies and firefighting access. The Code of Practice enables a flexible yet consistent approach throughout New Zealand and allows FENZ to operate effectively and efficiently in a fire emergency. FENZ considers that the best way to provide a consistent approach to mitigating the actual and potential effects of fire across the district is to include specific standards in district plans.

Proposed features relevant to FENZ:

The proposal is for an extension to the existing designation for the Kirwee Recreation Reserve. This involves designating an additional 6.5 ha of land adjoining the existing Recreation Reserve, located off Tramway Road.

The extension to the designation is to provide for additional recreational facilities, including a new community hub (subject to further detailed design), toilet block, various sport fields, additional carparking and landscaping. The application states that these facilities are necessary to meet the demands of the Kirwee and Selwyn communities.

The application states the new fields and landscaping will be irrigated via onsite storage tanks filled with water from the Central Plains Irrigation Scheme. The Conceptual Reserve Master Plan shows these tanks located in the north of the site, approximately 150 m from the new facilities. No details are provided regarding the volume of storage. Additionally, there appears to be no information regarding servicing for the new Community Centre. It is however noted that new fire hydrants will be installed in proximity to the carparking area.

It is noted that the Recreation Reserve and the Kirwee township do not currently have a water supply adequate for firefighting purposes. The inadequacy of the current water supply in Kirwee for firefighting purposes was recently demonstrated during efforts to extinguish the recent blaze at the Kirwee Tavern. The water supply from the hydrants in Kirwee is not consistent and the pressure and output varies on the occasions they have been used.

FENZ is concerned that without certainty around the water supply to the extended Recreation Reserve, future development within the reserve may impact upon FENZ's ability to protect lives.

FENZ seeks the following decision from the local authority:

While FENZ is not opposed to the principal of extending the Recreation Reserve, for the reasons set out above, FENZ is unable to remain neutral to the proposed alteration to the Kirwee Recreation Reserve Designation in its current form. Kirwee currently has an insufficient water supply for firefighting purposes and the proposed extension to the designation, does not provide FENZ certainty that this will be addressed.

FENZ seeks that the Recreation Reserve be provided with a water supply connection that complies with the Code of Practice. Where a reticulated water supply cannot provide adequate water volume and pressure for firefighting as set out in the Code of Practice, as is likely to be the case in Kirwee, an alternative on-site firefighting water supply shall be provided in accordance with the Code of Practice. The irrigation tanks may be able to serve this purpose, but more details and possible relocation / redesign may be necessary.

FENZ welcomes the opportunity to work with the applicant and to establish an acceptable firefighting solution for the designation area, whereby it is FENZ's expectation that opposition to the proposed extension could be withdrawn. FENZ is hoping to have the opportunity to meet with Selwyn District Council to discuss the water issues in Kirwee in the near future.

FENZ could not gain an advantage in trade competition through this submission.

FENZ wishes to be heard in support of its submission.

If others make a similar submission FENZ will consider presenting a joint case with them at a hearing.



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(Signature of person authorised to
sign on behalf of Fire and
Emergency New Zealand)

26/02/2020

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Date

Title and address for service of
person making submission:

Fire and Emergency New Zealand
c/o Beca Ltd

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