

Submission on Publicly Notified Plan Change

Plan Change 28

(Form 5 under Resource Management (Forms, Fees and Procedures) Amendment Regulations 2006)

Clause 6 of First Schedule, Resource Management Act 1991

To: Selwyn District Council
Name of submitter: New Zealand Fire Service Commission (NZFS)
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CHRISTCHURCH

This is a submission on Plan Change 28 (Denwood Trustees)

The specific parts of the plan change that this submission relates to are:

Proposed Plan Change Amendment 18, as follows:

*“...private vehicular access ways servicing less than three sites shall have a maximum formed width of **3.5m** at the road boundary and within 10m of the road boundary”.*

The NZFS seeks the provision of suitable vehicular access to properties within the proposed plan change area to ensure that Fire Service appliances can enter the property for fire fighting purposes, and carry out their responsibilities effectively and efficiently.

The NZFS's comments are:

In achieving the sustainable management of natural and physical resources under the RMA 1991, decision makers must have regard to the health and safety of people and communities. It is essential that the NZFS is able to meet its responsibility of ensuring the efficient, effective and economic management of the functions and activities of the NZFS through the provision of an effective emergency service to all New Zealanders so as to reduce the occurrence and impact of fire and other emergencies (Fire Service Act 1975).

The NZFS acknowledges that the applicant has made specific reference to the New Zealand Fire Fighting Water Supplies Code of Practice SNZ PAS 4509: 2008 (NZFS Code of Practice).

The NZFS accepts that the Water and Wastewater Services Report provided as part of the Plan Change documentation confirms that a full pressure reticulated supply can be provided to the area subject to the plan change request, and therefore, agrees that in this regard it will be compliant with the NZFS Code of Practice.

Given that the Water and Wastewater Services Report included in the application has confirmed that the Plan Change area will be serviced by a compliant reticulated water supply the NZFS are satisfied that should the requested plan change be accepted by the Council, the proposal will provide sufficient water supply for fire fighting purposes.

However, the NZFS is concerned that the vehicular access provisions proposed in the Plan Change will be insufficient to enable Fire Service appliances to access properties that will be created under this Plan Change. Specially, the NZFS are concerned about the following standard included on page 14 of the plan change document:

*“...private vehicular access ways servicing less than three sites shall have a maximum formed width of **3.5m** at the road boundary and within 10m of the road boundary”.*

For Fire Appliances to have suitable access to the properties the minimum access width should not be less than 4 m, as prescribed in the NZFS Code of Practice. The Code considers the adequacy of a firefighting water supply to be determined by not only an assessment of the water supply that must be available, but also whether there is appropriate access for the NZFS to enable the water supply to be used. Access widths should support the operational requirements of Fire Service appliances in order for them to be able to provide the services required. In the case of this private plan change application the NZFS therefore considers that the access widths proposed for properties are inadequate and will not enable the NZFS to operate effectively and efficiently.

Therefore, should the Council be of the mind to accept the private plan change, the NZFS requests that the vehicular access to all the properties in the plan change area complies with the minimum access widths prescribed in the NZFS Code of Practice to ensure Fire Service appliances have sufficient vehicular access to the properties for fire fighting purposes.

The NZFS does wish to be heard in support of their submission.

If others make a similar submission the NZFS does not wish to present a joint case with them at a hearing.



Claire Lindsay

**(Authorised to sign on behalf of New
Zealand Fire Service)**

27 November 2012

New Zealand Fire Service Commission

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Attention: Claire Lindsay