

FORM 5

SUBMISSION ON A PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION IN ACCORDANCE WITH CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

To: Selwyn District Council

Submission on: Private Plan Change 34 (Selwyn)

Name of submitter: **New Zealand Fire Service Commission (NZFS Commission)**

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This is a submission on proposed Private Plan Change 34 which seeks to rezone 5.9ha of land located on High Street on the Southbridge Town boundary. The land is currently zoned Rural (Outer Plains) Land and is proposed to be changed to Living Zone 1 to facilitate residential development at Southbridge.

This submission specifically relates to:

The provision of water supply for fire fighting purposes and access to this supply.

The NZFS Commission's submission is:

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. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The risk of fire represents a potential adverse effect of low probability but high potential impact. The NZFS Commission has a responsibility under the Fire Service Act 1975 to provide for structural firefighting activities in a safe, effective and efficient manner. As such, the NZFS Commission monitors development occurring under the RMA 1991 to ensure that, where necessary, appropriate consideration is given to fire safety.

The NZFS Commission's main areas of concern are the provision of a water supply and access to this supply which will enable the New Zealand Fire Service (NZFS) to operate effectively and efficiently. This is best achieved through compliance with the New Zealand Standard for the provision of a firefighting water supply, known as the *New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008* (the NZFS Code). The NZFS Code sets out the standards required for firefighting water supply and access in order for the NZFS to operate effectively and efficiently in a fire emergency. Standards are set out in the NZFS Code which applies to both reticulated and non-reticulated water supply systems, as the NZFS may be required to respond to a structural fire emergency in any area.

The NZFS Commission notes that the applicant has submitted a letter from Opus Consultancies stating that there is potential to increase the pumping capacity from the existing water supply bores to service the additional connections that will result from the subdivision of this site. High Street currently has a 100mm diameter water main with an approximate pressure of 400kPa. The application states that a 150mm diameter water main within the main link road of the site will have the capacity to supply water to the site. Smaller 100mm diameter water mains laid within the site will have the capacity to provide water to the sites in the future. The Opus letter also notes the lack of firefighting allowance in the water supply. It states that the 150mm diameter water main allows for a residual pressure at site connection points to a minimum of 250kPa.

The NZFS commission is concerned that although the infrastructure within the subdivision will be able to support a fully reticulated system, compliance with the NZFS Code will only be achieved 'if' the Selwyn District Council alters the current water take consents for the town supply to provide for the increase in pressure required to meet the NZFS Code. Until this occurs, only limited reticulated water supply will be provided which does not meet the requirements of the code for fire fighting water supply.

The NZFS prefers the provision of a fully reticulated water supply that meets the operational needs of the NZFS in terms of quantity and pressure from the commencement of development. This is the most reliable source of water when attending a fire emergency. In cases where only a limited/restricted reticulated supply can be made available, the NZFS are still able to respond effectively and efficiently to a fire emergency if an on-site fire fighting water supply is provided to the standards of the NZFS Code. There is no certainty that the Council will upgrade their water take consent before the houses are built on the new sites or that consent would be granted. Therefore, the NZFS requests that the Code of Practice is complied with, by providing onsite firefighting water supply to the required standard until such time as the subdivision has a fully reticulated supply that also meets that standard. Unless a water supply can be provided that meets the standard required for firefighting there will be an increased risk that the NZFS will not be able to efficiently and effectively respond to structural fire emergencies in the new development area.

The NZFS Commission has a **neutral** position towards the approval of proposed Private Plan Change 34. However, if the plan change is granted, the Commission seeks to include rules that provide for onsite fire fighting water supply in accordance with the NZFS Code.

The NZFS Commission seeks the following decision from the consent authority:

For the reasons set out in the section above, the NZFS Commission requests that the following **additions** (underlined) be made to the wording of the proposed plan change as set out in the application (Italics). These amendments are consistent with the amendments to the Land Use Recovery Plan Action 18 (viii).

Southbridge

12.1.3.43- Any subdivision of land in the area shown in Appendix E43, at High Street, Southbridge, shall be designed in general accordance with the Outline Development Plan shown in Appendix E43.

12.1.3.44- Ensure that connections to reticulated water are available at all property boundaries. Where a reticulated water supply cannot provide adequate quantities and pressure for fire fighting as set out in SNZ PAS 4509:2008, an on-site firefighting water supply shall be provided in accordance with SNZ PAS 4509:2008.

Part C, Rule 12.1.6- The following activities shall be discretionary activities

12.1.6.8- Any subdivision subject to Rule 12.1.1 which does not comply with Rule 12.1.3.43 and Rule 12.1.3.44

The NZFS Commission wishes to be heard in support of their submission.

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



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(Signature of person authorised to sign on behalf of New Zealand Fire Service Commission)

11/11/2014

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Date

