

Form 5

Submission on Proposed Plan Change 60: Kirwee (Kirwee Central Properties Limited) – Selwyn District Council

To: Selwyn District Council

Submission on: Plan Change 60 – Kirwee

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 proposed Private Plan Change 60 to the Selwyn District Plan (hereafter “PC60”).

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 PC60 in enabling additional housing and managing future development in 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 changes in statutory planning documents occurring under the RMA 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. PC60 provides an opportunity to better facilitate these activities, by including appropriate plan provisions

which will enable people and communities to provide for their health and safety with regard to fire safety, fire prevention, and fire extinction.

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 new dwelling or 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.

Regarding vehicle accessibility within the plan change area, provided new accesses are developed in accordance with the existing provisions of the Plan, there should be sufficient access for firefighting appliances.

Proposed PC60 features relevant to FENZ:

PC60 seeks to rezone approximately 17.9 ha of land at Kirwee, from Living 2A to Living 1, allowing a higher density of residential development than is currently permitted. The plan change does not seek to introduce any new objectives, policies or rules into the District Plan.

The plan change area is not currently serviced by a reticulated water supply. PC60 notes that the existing water supply in Kirwee does not have sufficient capacity to service the proposed plan change area and will need to be augmented to service the site.

PC60 states that new mains, fire hydrants and water supply pipes will be installed on the site and they will be sized and positioned to meet the requirements of residential potable water supply and firefighting water supplies. Subject to establishment of new network supply and pressure, it is expected that new pipe sizes and positioning of hydrants will satisfy the Code of Practice. However, at this stage details of the water supply network remain unknown and therefore the ability to achieve full compliance with the Code of Practice cannot be verified.

There are no requirements within the existing District Plan provisions which require newly subdivided properties within the Living 1 Zone to provide a firefighting water supply in accordance with the requirements of the Code of Practice. The provision of firefighting water supply is an assessment matter for controlled or restricted discretionary activities

FENZ is concerned that without certainty around the water supply to the plan change area, future growth may impact upon FENZ's ability to protect lives. FENZ considers that specific standards for firefighting water supply are needed to provide certainty and, ultimately, to manage the fire risk from new development in the PC60 area. 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.

FENZ seeks the following decision from the local authority:

For the reasons set out above, FENZ is opposed to PC60 in its current form. Kirwee currently has an insufficient water supply for firefighting purposes and PC60, as it currently stands, does not provide FENZ with the certainty necessary to support or remain neutral with respect of the plan change.

FENZ seeks the addition of provisions as part of PC60 that require any new lots or habitable buildings within the plan change area to 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, an alternative on-site firefighting water supply shall be provided in accordance with the Code of Practice.

FENZ welcomes the opportunity to work with the applicant to establish an acceptable firefighting solution for the plan change area.

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)

19/02/2020

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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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