

Form 5

Submission on Proposed Plan Change 62: Leeston – Selwyn District Council

To: Selwyn District Council

Submission on: Plan Change 62 - Leeston

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 62 to the Selwyn District Plan (hereafter “PC62”).

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 PC62 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. PC62 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.

Proposed PC62 features relevant to FENZ:

PC62 seeks to rezone approximately 60 ha of land on the western side of the Leeston township to facilitate the future development of approximately 410 residential sites. The plan change area is currently zoned Living 1 (Deferred), Living 2 (Deferred) and Rural (Outer Plans) with a proposed zoning mix of Living 1 and Living 2. PC62 would largely adopt the existing provisions of the operative District Plan, with policy changes to remove the deferred status and include an Outline Development Plan for the area.

The plan change area is serviced by a reticulated water supply; however, PC62 notes that this is not sufficient for the future development proposed and augmentation of the existing system is required. The Council has recently purchased a utility allotment within the plan change area and a bore is in the process of being designed and constructed. PC62 notes that the area is proposed to be serviced via a mains pressure on demand reticulated system and the additional bore will provide the additional capacity required for the plan change area. PC62 notes that augmentation of the existing water supply network will ensure that the Code of Practice requirements in terms of hydrant spacing can be met.

There are no requirements within the existing District Plan provisions which require newly subdivided properties within the Living 1 or Living 2 zones 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 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 PC62 area.

FENZ seeks the following decision from the local authority:

FENZ remains neutral towards PC62, subject to amendments being made. FENZ seeks the following amendments:

An additional rule after Rule 4.4 as follows:

The erection of any dwelling or principal building as identified on the Leeston Outline Development Plan in Appendix XXX shall be provided a water supply connection that complies with the *New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008*. Where a reticulated water supply cannot provide adequate quantities and pressure for firefighting as set out in SNZ PAS 4509:2008, an on-site firefighting water supply shall be provided in accordance with SNZ PAS 4509:2008.

Amendment to Rule 4.4.3 as follows:

Any activity which does not comply with Rule 4.4.2 and 4.4.x shall be a discretionary activity.

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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