

Selwyn District Council
2 Norman Kirk Drive
Rolleston 7643

11 September 2020

Attention: The Hearing Commissioner for Plan Change 62

Dear Commissioner

Fire and Emergency New Zealand - Plan Change 62 (Leeston)

Fire and Emergency New Zealand (FENZ), has opted not to attend the hearing on Plan Change 62 Leeston on Tuesday 15 and Wednesday 16 September 2020. FENZ requests that this letter be tabled for consideration in lieu of its attendance.

The Council Officer's section 42A report for the above application has been received as well as the Applicant's evidence. The Officer's report has recommended that Plan Change 62 (PC62) be granted, subject to some modifications (paragraph 10.15). The Council Officer's report summarises the FENZ submission (paragraph 7.44) identifying that the concern was raised in regard to the adequate supply of water for firefighting activities and that a specific provision was sought, however the proposed rule sought by FENZ as unnecessary, "*as sufficient measures are already provided to ensure that adequate water volumes and pressure are provided*" (paragraph 7.46).

For clarification, FENZ's submission on PC62 was neutral and sought amendments as follows:

An additional rule after Rule 4.4:

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.

And an 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 is concerned that without certainty around the water supply to the plan change area, future growth may impact on the ability of Fire and Emergency to protect lives in the event of an emergency. The provision of firefighting water supply is currently limited and as identified in the application, "*Council have advised the existing pump and pipe network does not have capacity to service future development of the site*" (p. 9). Without an extension to the reticulated network, and a granted water take consent from Environment Canterbury, there is concern that the limited reference to fire fighting water supply in the Selwyn District Plan means firefighting water supply will not be taken into consideration. As such, FENZ sought to add these provisions into the Plan Change area.

Discussion with Mike Gaskin, Fire Risk Management Officer and Specialist Fire Investigator, of Selwyn confirms there are no known issues with the water supply in Leeston when FENZ has been using it for an emergency. FENZ is happy to support an extension to the existing reticulated network, with non-restricted use for FENZ.

As outlined in the Council Officer's Report (paragraph 7.45), the Officer does not consider this request justified, as the matter is adequately provided for within Part C12 Subdivision. *"Council has specifically reserved its discretion to consider the provision of water for firefighting and consent for subdivision can be declined should the provision of sufficient water for firefighting not be provided"*. In addition, the Officer suggests that a site specific rule proposed by Councils' Asset Manager – Water Services, Mr England, be included in Part C12 Subdivision, making *"subdivision beyond the 80th lot non-complying until such time as the Leeston water supply system is capable of servicing the additional allotments within the plan change area"* (paragraph 7.43).

Mr England has confirmed that *"all new subdivisions need to be designed and constructed in accordance with Selwyn District Councils Engineering Code of Practice"* (paragraph 29). In this, there is a specific section requiring firefighting water in accordance with the SNZ: PAS 4509:2008 for all on demand reticulated networks. This includes the requirements for firefighting flows, residual fire pressure and the spacing of hydrants. The applicant has indicated that any new pipe sizes and positioning of the fire hydrants, would satisfy the Code of Practice. Mr England notes in his evidence, that the Leeston scheme was designed to comply with SNZ: PAS 4509:2008 and that the reticulated water supply for this proposed plan change shall be designed to meet firefighting standards.

FENZ would be happy to work with the Applicant when it comes to designing the network to ensure it will satisfy the requirements of the SNZ: PAS 4509:2008.

In relation to the Officers proposed rule related to making subdivision over 80 allotments a non-complying activity, this is mentioned in regard to the wastewater treatment (paragraph 7.37) and water supply for potable water. The inclusion of this rule in regard to water supply for fire-fighting purposes is supported by FENZ.

The evidence of Michael Vincent for the Applicant supports the Council Officer's report, and as outlined in paragraph 71:

"... there are options to provide water supply to meet fire-fighting requirements and any future subdivision of the site would need to comply with Selwyn District Council's code of engineering practice. In my opinion, water supply for the purpose of firefighting can be provided to the Plan Change site through the new bore located in the northern half of the site and through the proposed reticulated supply and use of on-site storage for the large allotments. Any resultant subdivision process would be required to detail the particular method of conveying adequate fire-fighting water supply and ensure that the proposal will comply with Council code of engineering practice".

If the Commissioner is of the view that PC62 should be granted, Fire and Emergency request that the rule requiring subdivision over the 80th allotment be non-complying, until such a stage that the water supply system is upgraded to be capable to servicing the additional allotments in the plan change area.

Should you have any questions or seek clarification on the above, please contact me on the details below.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'N Vincent', written in a cursive style.

Nicolle Vincent

Planner

on behalf of

Beca Limited

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Mike Gaskin, Fire and Emergency New Zealand