

## Form 5

### **Submission on Proposed Plan Change 66: Maddisons Road, Rolleston – Selwyn District Council**

To: Selwyn District Council

Submission on: Plan Change 66 – Maddisons Road, Rolleston

**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 66 to the Selwyn District Plan (hereafter “PC66”).

The Fire and Emergency New Zealand Act 2017 (FENZ Act) established FENZ from 1 July 2017. 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 PC66 in enabling additional industrial 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. PC66 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 PC66 features relevant to FENZ:**

PC66 seeks to rezone approximately 27.27 ha of land at Maddisons Road, Rolleston, from Rural Inner Plains to Business 2A zone, allowing for the development of industrial activities. The site is adjacent to existing Business 2A zoning and Rural Inner Plains. The plan change proposes to insert one new Outline Development Plan (ODP) and make reference to this throughout the relevant section where required. The plan change does not seek to introduce any new objectives, policies or rules into the District Plan.

The plan change application states that the applicant is of the view that the area is able to be fully reticulated with water, and mains water is indicated along the proposed new road plans. The application discusses an “Opus Report” that was completed in 2014 for the adjacent site. The infrastructure report says that “*on the basis that the industrial land is developed in accordance with the Opus recommendations, water supply to the site is not a constraint*”. This report does not appear to be part of the application online. However, the Infrastructure Report notes that there is the potential that a heavy industrial facility (on this site) will have insufficient water supply to meet fire water flow rates, in which case suitably sized water storage tanks could mitigate this issue as they could manage the peak flows. FENZ recognises that the scale and potential water demand are yet to be confirmed, however seeks to provision for future developments.

The application is unclear as to what the source of the water will be (whether it will be ground sourced through wells, or connected to a reticulated network) and it appears that there is one outstanding matter (in the Report to Council) relating to water and wastewater peak flows on the site. The applicant has engaged a consultant to provide this information, however at the time of notification, this information was not available on the Selwyn District Council website.

Given this, there is a risk that insufficient water supply for firefighting may be provided to the site, as there appears to be missing information and a lack of clarity surrounding the water supply.

In all Business zones, the erection of any dwelling or principal building is permitted provided it is connected to a reticulated water supply that complies with the New Zealand Drinking Water Standards. Activities that do not comply with this are Non-Complying. The provision of firefighting water supply is excluded from this provision, however the connection to a reticulated network is a positive outcome for FENZ particularly if there are sufficient flows for firefighting.

**FENZ seeks the following decision from the local authority:**



For the reasons set out above, FENZ is neutral to PC66. While the application states water supply can be provided, until this documentation is provided in addition to the application, FENZ does not have certainty that there is an available connection with sufficient flows for firefighting.

FENZ seeks this information be provided and for FENZ to have the ability to review this information to check compliance with the Code of Practice for the intended use of the site. 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 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.**



.....  
(Signature of person authorised to  
sign on behalf of Fire and  
Emergency New Zealand)

25/02/2021

.....  
Date

Title and address for service of  
person making submission:

Fire and Emergency New Zealand  
c/o Beca Ltd

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