

Form 13

Submission on application concerning resource consent that is subject to public notification by consent authority

Section 95C, Resource Management Act 1991

To: Selwyn District Council

Submission on: Publicly Notified Resource Consent – Subdivision – Kevler Developments Limited

Name of Submitter: Fire and Emergency New Zealand

This is a submission on an application from Kevler Developments Limited for resource consent to subdivide and establish residential dwellings on land at Springston Rolleston Road, north of Kate Shepard Drive. The proposed activity is to create 271 lots for residential purposes, seven access lots, two recreation reserves and two local purpose reserves. The following resource consents have been sought from Selwyn District Council (SDC):

- **RC225715** – Subdivision consent to create 271 fee-simple allotments, roads and reserves in Rolleston
- **RC225716** – Land use consent to establish residential dwellings, new roading, vehicle access and earthworks.

Fire and Emergency New Zealand's (Fire and Emergency) interests and subsequent relief sought below relates to **RC225716** and **RC225715**.

Fire and Emergency is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (RMA).

Fire and Emergency **support** the resource consent application, subject to the relief sought in its submission.

The specific parts of the application that Fire and Emergency's submission relates to are:

- The provision for firefighting water supply; and
- Emergency service access

Fire and Emergency's submission is:

In achieving the sustainable management of natural and physical resources under the RMA, 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. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency monitors development occurring under the RMA to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

In order for Fire and Emergency to achieve their principle objective which includes reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property land, and the environment, Fire and Emergency requires adequate water

supply be available for firefighting activities; and adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies.

The provision for adequate water supply is therefore critical. It is important to Fire and Emergency that any new subdivision or land use has access to adequate water supply (whether reticulated or non-reticulated). This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA.

Firefighting water supply

A servicing report has been prepared by Survus Consultants to support the application. The servicing report has advised that firefighting water supply would be reticulated, unrestricted and subject to the provisions of FW2 from the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008) with a minimum of 12.5l/s and a residual pressure of 100kPa. Furthermore, the report indicates that all new mains will have hydrants spaced to satisfy SNZ PAS 4509:2008. However, there has not been any modelling completed to determine whether the reticulated water supply would provide sufficient capacity or pressure to meet SNZ PAS 4509:2008.

Given there has not been any modelling undertaken to confirm the reticulated water supply, there is a risk that there may not be sufficient capacity and pressures in the networks at the time of development to comply with SNZ PAS 4509:2008.

Access

The applicant is proposing a local road connection to Hungerford Drive and further connections to the land to the north, south, east and west. Ten new internal roads will also be established and these will be in accordance with Selwyn District Plan. Based on the schematic plan provided it is considered that these internal roads will be suitable for Fire and Emergency appliances.

The application indicates that there are nine right of ways to service two lots each with a legal width of 4.5m and a carriageway width of 3m in accordance with the Selwyn District Plan. The carriageway widths of the right of ways is not considered to be sufficient as fire appliances require a minimum carriageway width of 4m. It is noted that that fire appliances may be able to access these properties from the internal roads rather than needing to use the right of ways. However, the preference for Fire and Emergency, is for the right of ways to be trafficable by fire appliances as where safe to do. Therefore, requiring a minimum carriageway width to locate an appliance as close as practicable to the incident.

In addition, there are six rear lots that have access legs from the internal roads, with legal widths ranging from 3.5m to 3.8m. Although the legal widths are less than 4m these are considered to be suitable for fire appliances as the distance to the rear of the site from the road is within a 75m hose run.

Fire and Emergency seek the following decision from the consent authority:

Fire and Emergency seeks that the right of ways are developed to provide a carriageway width of 4m to enable easy access for fire and emergency appliances.

Fire and Emergency request that further information is provided that includes the following:

- Evidence that the that the proposed water supply will have sufficient water capacity and pressure in accordance with SNZ PAS 4509:2008.

If Council do not consider the above request is necessary prior to the granting of consent, Fire and Emergency request that the following condition of consent be imposed on **RC225715 and RC225716** as follows:

- (1) *Prior to commencing construction, the consent holder shall undertake modelling of the reticulated water supply. The consent holder shall provide evidence to Selwyn District Council that the water supply will have sufficient water capacity and pressure in accordance with SNZ PAS 4509:2008.*

Note: If the reticulated water supply does not comply with SNZ PAS 4509:2008, consultation shall occur with Fire and Emergency to establish as suitable alternative water supply that complies with SNZ PAS 4509:2008.

Fire and Emergency **may wish to be heard** in support of its submission. If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at the hearing.

Fire and Emergency **does not request**, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.



Signature of person authorised to sign on behalf of
Fire and Emergency

Date:	26/05/2023
Electronic address for service of person making submission:	[REDACTED]
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