

## Form 5

### Submission on Proposed Plan Change 22: Seadown Properties Ltd – Timaru District Council

To: Timaru District Council

Submission on: Proposed Private Plan Change 22 - Seadown Properties Ltd.

**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 22 to the Timaru District Plan (hereafter “PC22”).

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.

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. PC22 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.

### **1.1 Adequate water supply and access for firefighting activities:**

The New Zealand Firefighting Code of Practice SNZ/PAS 4509:2008 (Code of Practice) is a non-mandatory New Zealand Standard that sets out the requirements for firefighting water and access. The Code of Practice enables a 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 (rather than just the notified applications for resource consents) is to include specific standards in district plans.

Adequate access to both the source of a fire and a firefighting water supply is also essential to the efficient operation of FENZ. The requirements for firefighting access are set out in the Code of Practice and further detailed in FENZ's 'Emergency Vehicle Access Guidelines' (May 2015).

### **1.2 Proposed PC22 features relevant to FENZ:**

PC22 seeks to rezone approximately 9.3ha of land at Washdyke, from Rural 1 and Rural 2 to Industrial L. The plan change proposes amendments to the Timaru District Plan that include amending of the District Plan Planning Maps to rezone the subject site; the introduction of an Outline Development Plan to coordinate and guide the future development; and amending an existing policy and rule and introducing new rules that manage future subdivision and development.

Provided new accesses in the plan change area are developed in accordance with the existing provisions of the Plan, there should be sufficient access for firefighting appliances. A fire appliance requires, as a minimum, access which is four metres in width and four metres in height clearance, with a maximum gradient of 1 in 5 (and accompanying transition ramps).

The application is very light on detail in regard to water supply. It identifies that the proposed Industrial L land will be serviced by the Timaru District Council water, sewerage and stormwater reticulated networks, and that this will be located within the road reserve.

FENZ is concerned that if there are no specific provisions requiring water supply that is compliant with the Firefighting Water Supply Code of Practice, then large industrial buildings are able to go ahead without a firefighting water supply.

There does not appear to currently be any requirements in the existing District Plan provisions that require buildings in the Industrial L zone to have a firefighting water supply in accordance with the Code of Practice.

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.

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

FENZ is neutral towards PC22. Should Timaru District Council approve the plan change, FENZ seeks the following amendments:

A new provision be inserted as follows

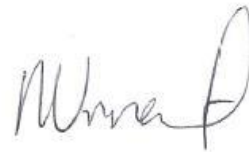
*5.47 – Prior to the occupation of any building within the Outline Development Plan Washdyke Flat Road area, firefighting water supply for that building must be provided in accordance with the Code of Practice NSZ PAS 4509:2008.*

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.**



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

08/06/2020

.....  
Date

Title and address for service of person making submission:

Fire and Emergency New Zealand  
c/o Beca Ltd

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