

Waipa District Council  
101 Bank Street  
Te Awamutu

10 June 2021

**Attention: Hearing Panel Commissioners**

Dear Commissioners

**Proposed Plan Change 13: Uplifting Deferred Zones**

Fire and Emergency New Zealand (Fire and Emergency) has lodged a submission (Submitter 7) and further submission (FS5) on the Proposed Plan Change 13 (PPC13). Fire and Emergency has requested to attend the hearing scheduled to commence Wednesday 16<sup>th</sup> June 2021 and requests that this non-expert statement in support of Fire and Emergency's submission and further submission be tabled for the Hearing Commissioners' consideration.

The Section 42A Officer's Report (Officer's report) has been received. Fire and Emergency's response to the Officer's report recommendations on these submission points are set out below.

Fire and Emergency Submission

The proposed changes for removing the ability to uplift any Deferred Zone via a Council resolution are supported by Fire and Emergency. The proposed process is considered to be an improved process given that a plan change process will be needed to uplift a deferred zone, allowing Fire and Emergency (and other key stakeholders) to lodge a submission.

In terms of re-zoning all of the pre-2035 growth cells to 'live' urban zones, Fire and Emergency seeks certainty that sufficient water supply infrastructure and access for emergency vehicles is available or provided for prior to development of these growth cells through the resource consent process (if there is no structure plan).

Fire and Emergency consider that Section 15 does broadly contain appropriate controls (including cross-references to Regional Infrastructure Technical Specifications) to ensure that firefighting water supply and suitable access for emergency vehicles will be adequately addressed at the time of subdivision and subsequent development of these growth areas. As such, Fire and Emergency agree in part with Council that the necessary detail relating to infrastructure provision will be adequately considered through a subdivision consent process.

Fire and Emergency do however consider that removing the requirement for structure plans to be in place prior to the subdivision / development of these growth cells has the potential to result in poor urban outcomes, particularly in relation to servicing and infrastructure. Fire and Emergency do recognise that some of the growth cells subject to uplift (i.e. large lot residential growth cells such as C6) will not be serviced by Council reticulation networks for water supply, instead requiring the use of on-site infrastructure. Nonetheless, Fire and Emergency consider that Council should be taking responsibility for structure planning and growth management, to ensure that adequate infrastructure is in place before enabling the development of these large growth areas, particularly those that are intended to be serviced. This includes reticulated water supply, roading and property access in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice) and the Regional Infrastructure Technical Specifications.

Fire and Emergency seeks ongoing collaboration with Council to ensure that water pressures in the district's urban areas are maintained in accordance with the Code of Practice.

#### Further Submission

Fire and Emergency supported the submission made by Submitter 15 for the following reasons:

- Fire and Emergency identified in their original submission that Waipā District Council have issues at a district-wide level in relation to reticulated water pressure.
- Fire and Emergency recognise that some of the growth cells (i.e. C6) will not be serviced by Council reticulation networks for water supply, however, those that are (i.e. C4) will need to be adequately serviced. This includes reticulated water supply, roading and property access in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice) and the Regional Infrastructure Technical Specifications.
- Given the significant growth the Waipā District is experiencing, the proposed growth cells that are intended to be connected to the reticulated network will put greater pressure on the already strained network. Inadequate water pressure that does not meet the requirements set out in the Code of Practice poses a significant risk to the health, safety and wellbeing of people in the Waipā community, and to the ability for Fire and Emergency to effectively fight a fire, when fire occurs in an urban environment.

Fire and Emergency agree that fire hydrant testing should be undertaken by Council for fire hydrants in the reticulated areas that will be impacted by the new growth cells. This will assist in determining what upgrades are needed across the district, prior to development commencing.

#### Officer's Report Response

The Reporting Officer has accepted in part Fire and Emergency's submission. In terms of the relief sought, the Reporting Officer notes that Council are open to continuing to work with Fire and Emergency regarding development, and have recently undertaken Plan Change 16 – Technical Improvements which resulted in amendments to the District Plan provisions within Section 15 – Infrastructure, Hazards, Development and Subdivision, regarding water supply and firefighting provision.

The Reporting Officer considers that the amendments made through Plan Change 16 are considered to be the most appropriate changes to ensure the concerns raised by Fire and Emergency are addressed.

Fire and Emergency agree with the Reporting Officer insofar that the District Plan, specifically Section 15 contains appropriate controls to ensure that firefighting water supply and suitable access for emergency vehicles will be adequately addressed at the time of subdivision and subsequent development of these growth areas. This includes the most recent amendments to Section 15 made through Plan Change 16 relating to the provision of firefighting water supply in non-reticulated areas.

However, Fire and Emergency wish to re-iterate that given the significant growth the Waipā District has experienced in recent years, coupled with the number of new subdivisions and growth cells that have recently been connected to the reticulated water supply, that the proposed growth cells that are intended to be connected to the Council network will put greater pressure on the already strained network. This has become apparent with the T2 Growth Cell which has recently been approved via Plan Change 12 where, in order to service the T2 and future T1 developments, upgrades to the water supply network and installation of a booster pump have been proposed. However, the proposed water supply network (with the upgrades to the network in place) will unlikely be able to achieve FW3 pressures, which is a requirement for the

proposed retirement village and all other structures characterised by a fire hazard category in the Code of Practice, unless buildings are sprinkler protected.

Given that adequate water supply is a fundamental safety and wellbeing issue, and the heightened risk associated with development of the pre-2035 growth cells all occurring within the next decade (and potentially proceeding before the water pressure issues are addressed in the Waipa district), Fire and Emergency strongly recommend that Council address the water supply deficiencies holistically (i.e. through structure planning) and at an early stage to ensure that adequate water supply for firefighting purposes is available to all pre-2035 growth cells that are intended to be reticulated, prior to development commencing.

In terms of Fire and Emergency's further submission, the Reporting Officer considered that fire hydrant testing for an area of existing development which is outside of an area recommended to have the deferred zone uplifted is outside of the scope of the plan change. Fire and Emergency agree with the Reporting Officer in part, however, consider that all effects as a result of the uplifting of deferred zones are required to be considered. This includes the effects on the reticulated water supply network.

The Reporting Officer further states that at the time of subdivision, all infrastructure is required to be designed, constructed and tested in accordance with the necessary standards before being vested in Council. This includes water supply being suitably tested for firefighting purposes.

However, in Fire and Emergency's experience, this is not always the case. Fire and Emergency have observed developments being completed without adequate reticulated water supply and pressures available.

This has become apparent in areas where land has been opened up by Council for industrial development and include areas along and within the Peake Road / Hannon Road / Hautapu Road boundary and in particular within the C8 industrial growth cell. Fire and Emergency are observing situations where buildings are being consented by Waipa District Council and built on the premise that reticulated infrastructure will be in place. There have been cases where developments have been completed without reticulated water supply infrastructure in place, with consented developments outpacing Council's plans to have water supply infrastructure installed. As such, these developments do not have adequate firefighting water supply in accordance with the Code of Practice.

Not having water supply infrastructure in place prior to land use resource consent being granted and buildings being built has a significant impact on the operational requirements of Fire and Emergency and results in a significant risk to the district. Industrial zones in particular require greater firefighting water supply volumes due to the higher fire risk activities and scale of buildings that occur in these zones. Should a fire emergency occur in a location that does not have adequate firefighting water supply, this significantly increases the risk of harm to people, damage to development and other adverse effects on the environment including run off.

As such, Fire and Emergency are not confident that adequate measures will be in place to ensure that the required reticulated water supply network will be in place prior to development commencing. Fire and Emergency seek certainty that reticulated water supply networks will be installed in a timely matter and that water pressures in the district's urban areas are maintained in accordance with the Code of Practice.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alec Duncan', written in a cursive style.

**Alec Duncan**  
Planner

on behalf of

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