

## Submission on notified Private Plan Change 14 to the Waipā District Plan

---

### Form 5

Clause 6 of the First Schedule to the Resource Management Act 1991

**Submitter:** Fire and Emergency New Zealand  
**Contact name:** Nicola Hine (Consultant)  
**Contact number:** [REDACTED]  
**Email:** [REDACTED]  
**Address for service:** [REDACTED]

**This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) on Private Plan Change 14 – C10 Growth Cell, Cambridge.**

- Fire and Emergency could not gain an advantage in trade competition through this submission.
- Fire and Emergency wish to be heard in support of its submission.
- Fire and Emergency support in part the Private Plan Change 14 (PPC14) for reasons set out in the sections below.

#### **Fire and Emergency's submission is:**

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency seek to:

- protect and preserve life,
- prevent or limit injury,
- prevent or limit damage to property and land, and
- prevent or limit damage to the environment<sup>1</sup>.

Fire and Emergency's main functions<sup>2</sup> are—

- (a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and
- (b) to provide fire prevention, response, and suppression services; and
- (c) to stabilise or render safe incidents that involve hazardous substances; and
- (d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and
- (e) to rescue persons who are trapped as a result of transport accidents or other incidents; and
- (f) to provide urban search and rescue services.

<sup>1</sup> Fire and Emergency New Zealand Act 2017 section 10(a)(b)

<sup>2</sup> Fire and Emergency New Zealand Act 2017 section 11(2)

Fire and Emergency also has secondary functions to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform their main functions efficiently and effectively. These secondary functions<sup>3</sup> are:

- (a) responding to medical emergencies; and
- (b) responding to maritime incidents; and
- (c) performing rescues, including high angle line rescues, rescues from collapsed buildings, rescues from confined spaces, rescues from unrespirable and explosive atmospheres, swift water rescues, and animal rescues; and
- (d) providing assistance at transport accidents (for example, crash scene cordoning and traffic control); and
- (e) responding to severe weather-related events, natural hazard events, and disasters; and
- (f) responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment; and
- (g) promoting safe handling, labelling, signage, storage, and transportation of hazardous substances; and
- (h) responding to any other situation, if Fire and Emergency has the capability to assist; and
- (i) any other function conferred on Fire and Emergency as an additional function by the Minister in accordance with section 112 of the Crown Entities Act 2004.

With the wider mandate and changing nature of Fire and Emergency response, the volume of incidents that Fire and Emergency responds to has grown, as has the range of incident types.<sup>4</sup>

Fire and Emergency also faces broad challenges, such as the increasing frequency and severity of extreme weather events, increasing intensification of urban areas, and competing access to resources such as water and transport infrastructure. These challenges make the environment Fire and Emergency operates in more complex and puts greater demands on Fire and Emergency as an organisation.

Waipā District Council (Council) have a role in ensuring that Fire and Emergency, as an emergency service provider, can continue to operate effectively and efficiently in a changing urban and rural environment. This includes ensuring emergency service appliances and Fire and Emergency personnel can adequately access both built and natural environments across the district in the event of an emergency, and ensuring new development is adequately serviced by firefighting water supply.

This submission seeks to enable Fire and Emergency to carry out its requirements under the Fire and Emergency New Zealand Act 2017 more effectively in the protection of people, property and the environment in the event of an emergency.

The key matters of interest to Fire and Emergency relate to the provision of firefighting water supply, access for emergency service vehicles and personnel and landscaping. These matters are discussed separately below as they relate to PPC14.

### **Firefighting water supply**

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. To achieve this objective Fire and Emergency requires adequate water supply be available for firefighting activities.

<sup>3</sup> Fire and Emergency New Zealand Act 2017 section 12(3)

<sup>4</sup> There is an increasing need to respond to a wide range of non-fire emergencies, where Fire and Emergency often coordinate with and assist other emergency services. These include responding to motor vehicle accidents, medical call-outs, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea.

It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing and that this water supply has adequate capacity and pressures available to service the future developments. In the urban areas of the district water is supplied via the reticulated water supply network.

As outlined in Section 4.3 of the application, PPC14 proposes that the Cambridge Urban Limits Boundary which denotes the 'urban limit' area within the Waipā District Plan, is extended to encompass the PPC14 area.

Fire and Emergency support the extension of the urban limit to include the PPC14 area, as this will ensure that the existing firefighting water supply provisions within Section 15 – Infrastructure, Hazards, Development and Subdivision of the Waipā District Plan apply to the PPC14 area. This includes the following existing provisions:

- 15.3.3.1(h) Policy - Servicing requirements
- 15.4.2.18 Rules - Additional infrastructure servicing for the Residential, Commercial and Industrial Zones within the urban limits

Rule 15.4.2.18 requires all lots in a subdivision and any sites in a development in Commercial and Industrial Zones within the urban limits to be connected to Council infrastructure services which includes water supply for firefighting purposes.

Rule 15.4.2.18 is followed with an advice note which explains that the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008) sets out Fire and Emergency's operational requirements and is to be used as a guide when designing firefighting water protection.

Fire and Emergency note that if the PPC14 area is not included within the 'urban limit' of the Waipā District Plan, no applicable provisions would exist within the rule framework to ensure firefighting water supply is provided for as a requirement of subdivision and development which presents a significant risk to Fire and Emergency's operations.

### **Emergency Service Access**

Fire and Emergency require adequate access to the built and natural environment to ensure that they can respond to emergencies. This includes access in the event of fire, natural hazard, hazardous substances, medical, or a rescue or assist.

For fire appliances to access an emergency, adequate carriageway width, height clearance, and road gradient is necessary to support the operational requirements of fire appliances. The general requirements which enable emergency vehicle access are as follows:

- Carriageway widths should not be less than 4m to accommodate a fire appliance. This width is required for firefighters to efficiently work around the fire appliance and safely access and operate the hoses and pumps.
- A clear vehicle crossing of no less than 3.5m wide should be provided as site entrances, internal entrances and between buildings.
- A height clearance at vehicle crossings and along carriageways should not be less than 4m. This includes gateways/doorways and overhanging structures (e.g. ducts, pipes, sprinklers, walkways, signs, structural beams, trees, hanging cables, etc.).
- The maximum negotiable gradient is 1:5, but in general the roading gradient should not exceed 16%.
- Operate pumping appliances from a hard standing capable of withstanding the fully laden weight of a fire appliance from which fire operations for a structure are conducted.

The full requirements for emergency vehicle access are set out in detail within the SNZ PAS 4509:2008 and within the Firefighting Operations Emergency Vehicle Access Guide (F5-02 GD).

The Integrated Transportation Assessment included as Appendix H of the application includes indicative road corridor designs for the Structure Plan area. Three connections into the existing transport network are proposed, two of which are designed to accommodate heavy/rigid vehicles. These include:

- Victoria Road Connection:
  - An internal industrial Collector Road is proposed to connect the PPC14 area with Victoria Road.
  - The cross section provided in Figure 10-1 of the application indicates two 3.5m wide lanes, separated with a 3.0m wide painted central median with intermittent planting.
  - Fire and Emergency note this is a departure from the Waipā District Plan requirements for the Industrial Zone which requires lane widths of 4m (Appendix T4 – Criteria for Public and Private Roads).
- Zig Zag Road Connection:
  - An internal urban industrial Local Road is proposed to connect the PPC14 area with Zig Zag Road.
  - The cross section provided in Figure 10-3 of the application indicates one formed carriageway width of 7m (with two 3.5m lanes, unseparated).
  - Within the PPC14 area, the Local Road will connect with two alignments of internal industrial Local Road (as described above) with an adjacent vegetated swale (Figure 10-2).
- Fire and Emergency note that the design for the Local Road and Local Road with Swale is a departure from the Waipā District Plan requirements for the Industrial Zone which requires lane widths of 4m (Appendix T4 – Criteria for Public and Private Roads).
- Swayne Road Connection:
  - An internal Minor Accessway link is proposed to connect with Swayne Road.
  - The cross section provided in Figure 10-4 of the application indicates two 2.7m wide lanes, separated with a 3.0m wide planted central median.
  - Fire and Emergency note that PPC14 has purposely restricted heavy vehicle traffic to and from Swayne Road, and it should be noted that this will restrict the ability for emergency vehicle access to access the PPC14 area from this direction.

As outlined above, SNZ PAS 4509:2008 and F5-02 GD require a minimum formed carriageway width of 4m for fire appliances. Fire and Emergency consider it is vital for emergency services to have adequate vehicle access to the PPC14 area and request that the Collector Road and Local Roads be amended to include a minimum lane width of 4m to provide sufficient width for fire appliances to traverse the corridor and operate from the road corridor, if required.

### Landscaping

PPC14 provides detailed landscaping plans, which includes buffer planting. Many areas in New Zealand experience drought conditions over summer, including Cambridge, which heightens the risk of vegetation fire.

Fire and Emergency acknowledge that the planting plans are in keeping with the surrounding area and what is commonly recommended with similar developments, however request that the applicant considers the selection of low flammability planting to reduce the likelihood of unwanted fire and to help manage fire spread in the event of a vegetation fire.

Further information on low flammability plan species can be found at:

<https://www.fireandemergency.nz/outdoor-and-rural-fire-safety/protect-your-home-from-outdoor-fires/flammability-of-plant-species/>

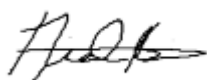
### Fire and Emergency seeks the following decision from Council:

Should Council be minded to accept PPC14, Fire and Emergency request the following:

1. For reasons set out above, that Council accept the extension of the 'urban limit' within the planning maps to include the PPC14 area. If this component of PPC14 is not accepted, a new policy framework for the provision of firefighting water supply in accordance with SNZ PAS 4509:2008 and specific to the PPC14 area is requested.
2. To manage the potential access risk for emergency vehicles to and within the PPC14 area, Fire and Emergency request that all Collector and Local Roads proposed in PPC14 are formed in accordance with the T4 provisions of the Waipā District Plan. This would require all lanes of the Indicative Internal Industrial Collector Road, the Indicative Internal Urban Industrial Local Road and Indicative Internal Industrial Local Road with Swale to be at least 4m wide.

Fire and Emergency would welcome any questions or further engagement on matters raised in the submission within.

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



Nicola Hine

**Beca Limited**

**Dated: 19 July 2024**