

Waipā District Council – Proposed Plan Change 16 Further Submission on behalf of Fire and Emergency New Zealand

*Further submission in support of, or in opposition to, submission on publicly notified proposed policy
statement or plan*

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waipā District Council

Further Submission on: Proposed Plan Change 16 – Technical Improvements

Name of organisation: Fire and Emergency New Zealand

Address for service: C/- Beca Limited
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This is a further submission on behalf of Fire and Emergency New Zealand (Fire and Emergency) both in support and in opposition to submissions on Proposed Plan Change 16 – Technical Improvements.

Fire and Emergency is a party who has an interest in Proposed Plan Change 16 – Technical Improvements that is greater than the interest the general public has, and also represents a relevant aspect of the public interest. This is for the following reasons:

- The role of Fire and Emergency prescribed in legislation includes promoting fire safety and fire prevention, and extinguishing fires. Proposed Plan Change 16 provides an opportunity to better facilitate these activities, by including appropriate objectives, policies and rules to enable people and communities to provide for their social and economic wellbeing, and for their health and safety with regard to fire safety, fire prevention and fire extinction.
- It is essential that Fire and Emergency is able to meet its responsibility of providing an efficient and effective emergency service to all New Zealanders, so as to avoid, remedy or mitigate the adverse effects of fire and other emergencies (as required by the Fire and Emergency New Zealand Act 2017).

Fire and Emergency's further submission

Fire and Emergency's support of, or opposition to, a particular submission including the reasons for support or opposition are identified in the table included in Appendix A (attached).

Fire and Emergency wish to be heard in support of their submission.

If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at the hearing.

R. Bann

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

26/02/2021

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Appendix A - Further submission on behalf of Fire and Emergency New Zealand

Submitter	Submission point and reason/s	Fire and Emergency position	Fire and Emergency reason/s
1 – Waikato Regional Council	<i>WRC supports the attempt to protect life and preserve human safety and acknowledges the difficulty in meeting that objective with the ambiguous nature and application of the existing rule.</i>	Support	Fire and Emergency supports WRC's position.
	<i>We support the inclusion of Issue 15.2.1A, Objective 15.3.5A, and Policy 15.3.5A.1 to strengthen and increase policy support for the existing rule for when infrastructure services are not provided by Council.</i>	Support	As per its original submission, Fire and Emergency support the inclusion of Issue 15.2.1A, Objective 15.3.5A, and Policy 15.3.5A.1 to strengthen and increase policy support for the existing rule for when infrastructure services are not provided by Council.
	<i>We trust Fire and Emergency Services New Zealand have provided advice to the Council on appropriate standards for mitigating fire risk.</i>	Support	Fire and Emergency engaged with Council prior to public notification of Proposed Plan Change 16 and had the opportunity to provide feedback on the proposed options. This correspondence is attached as Appendix 1 of Proposed Plan Change 16 Section 32 Evaluation Report. Further advice has been provided in Fire and Emergency's submission. Fire and Emergency welcome the opportunity to discuss, or provide further clarification, in relation to the management and mitigation of fire risk during the hearing process.
4 - Carla Mounsey	<i>Clarification around rule 15.4.2.22A(d)(i) is needed. If rule 15.4.2.22.A(d)(i) does mean capacity to store 45,000L of water I support it. If it is continuous store I do not support.</i>	Oppose	<p>Fire and Emergency oppose the submission by Submitter 4 on the basis that continuous storage of firefighting water supply is not supported by the submitter.</p> <p>The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice) allows for several alternative firefighting water sources where reticulated water supplies are unavailable or insufficient. This is set out in Appendix B (section B1 – B5) of the Code of Practice. For an alternative water source to be considered,</p>

		<p>(for example, the storage of 45,000L) all the requirements of Appendix B must be met. This includes:</p> <ul style="list-style-type: none"> B1.1 – Security B1.2 – Firefighting access <i>B1.3 – Adequacy of supply</i> B1.4 – Visibility B1.5 – Acceptable sources of supply <p>In response to the clarification sought by Submitter 4, as set out in the Code of Practice B1.3 requires that the owner of the supply must establish an acceptable means to reliably maintain any tank to a usable capacity. In addition, provision shall be made on all storage tanks and elevated tanks to:</p> <ul style="list-style-type: none"> (a) Automatically keep the tank topped up. (b) Manually re-fill the tank after emptying. <p>This means that there needs to be a reliable way to maintain the tank to a usable capacity of 45,000L – having a continuous supply so that sufficient water supply is available should a fire emergency occur.</p> <p>Through its submission, Fire and Emergency have recommended amendments to rule 15.4.2.22A to enhance the workability of the rule provision, and to ensure the firefighting water supply requirements are suitable for the intention of the newly created lot. Fire and Emergency consider that the rule, as set out in its submission is clear in its intent, where water supply shall be provided for firefighting purposes (and not just the ability to store water).</p> <p>Fire and Emergency note that there are also other alternative firefighting water sources that can be considered as part of or as an alternative to water tank storage. For example, should a lot have a swimming pool in the design that has the ability to store 45,000L or more then that too could be considered for the purpose of firefighting water supply, provided that the other requirements of Appendix B (i.e. B1.1 – B1.5) are also met. Fire and Emergency wish to re-iterate that the Code of Practice is written to provide</p>
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			flexibility as to how the firefighting water supplies can be determined and provided, and this can be discussed with local Fire and Emergency representatives directly.
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