

**Waipā District Plan**

**Submission on notified Proposed Plan Change 17**

**Form 5**

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

**Submitter:** Fire and Emergency New Zealand  
**Contact name:** Daryl Trim, District Manager - Waikato  
**Contact number:** [REDACTED]  
**Email:** [REDACTED]  
**Address for service:** [REDACTED]

**This submission is made by Fire and Emergency New Zealand (Fire and Emergency) on proposed Plan Change 17 – Hautapu Industrial Zones.**

- Fire and Emergency could not gain an advantage in trade competition through this submission.
- Fire and Emergency is directly affected by an effect of the subject matter that adversely affects the environment.
- Fire and Emergency do wish to be heard in support of its submission.
- Fire and Emergency oppose the proposed plan change request for reasons set out in the sections below, unless a satisfactory framework of provisions requiring firefighting water supply are incorporated into the plan change.

**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

<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)

- (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.

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.

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<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. In 2016/17, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined. (Source: NZ Fire Service Annual Report 2016/17)

### 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.

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 sourced from the reticulated water supply network, however where reticulation is not available, limited (i.e. trickle fed), or does not meet the level of service required by the New Zealand Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008), alternative water sources and/or addition supply will generally be required. This may be in the form of dedicated onsite water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

Adequate capacity and pressure for each development can be determined through SNZ PAS 4509:2008. SNZ PAS 4509:2008 is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access in order for Fire and Emergency to operate effectively and efficiently in an emergency.

Based on the Section 32 Evaluation Report, it is understood that among other changes to activate the plan change area, Council are proposing to restrict industrial activities within the Hautapu Structure Plan to 'dry industry' due to infrastructure constraints. Further, to manage impacts on the water supply network, the Hautapu Structure Plan is introducing a clarification that it will be based on 30 people per hectare occupancy, which is less than required by Regional Infrastructure Technical Specification (RITS) in order to address water allocation issues and the need to meet firefighting water supply demands.

Fire and Emergency would like to point out that providing for 'dry industry' to address inadequate water supply does nothing to reduce the need for provision of a suitable firefighting water supply to ensure that the level of service is maintained.

Of concern to Fire and Emergency, Section 3.5.1 of the Evaluation Report indicates that:

*"A water supply of FW2 (12.5Litres/sec) can be supplied to service each respective property located within this plan change (including Hautapu 'Area 6')".*

Fire and Emergency note that Section 6.1.3 of RITS requires the water supply network to comply with SNZ PAS 4509:2008 and that the network be designed to meet FW3 in all areas other than residential. Section 6.2.3.3 reiterates this and goes further to specify that:

*"where additional firefighting coverage is required, private storage shall be designed to comply with the requirements SNZ PAS 4509. The minimum requirements are based on SNZ PAS 4509, however this may need to be increased to ensure security of supply for operational purposes within the premise. It should not be assumed that current pressure and flow will be available in the future when designing private fire services as these are likely to reduce in the future due to demand growth and pressure management".*

Fire and Emergency recognise that the Water Supply Bylaw 2022 outlines that no draw is guaranteed in Council's network, specifically:

Section 12.4: *"Council is under no obligation to provide an On-demand Supply to Customer for fire protection purposes at any particular flow or pressure, or maintain existing pressures or flows".*

Section 14.3 goes on to state: *“If a Customer has a particular requirement for an uninterrupted flow, pressure or quality of water supply, it is the responsibility of that Customer to provide any necessary storage, back up facilities or equipment necessary to meet that Level of Service”.*

Should Council consider that the Water Supply Bylaw 2022 take precedence over the requirements of RITS, it will be paramount that Council ensure through the resource consent and bylaw connection approvals process that the Water Supply Classification for future developments are confirmed and if this is higher than that provided by the reticulated network, that adequate onsite storage in a suitable reservoir, tanks or ponds is provided in accordance with SNZ PAS 4509:2008. This would need to include the landowner providing evidence to Council at the time of development to confirm the level of service determined at the time of resource consent is still available from the reticulated network and the additional level of service required to be stored onsite is still in accordance with SNZ PAS 4509:2008.

Should a resource consent application or application to connect to the network not intend to comply, Fire and Emergency request that such applications be declined.

In terms of the mechanism to enforce the requirements of SNZ PAS 4509:2008, the plan change proposes to extend the urban limits to include C9 and ‘Area 6’ which is currently outside of the urban limits. This would mean if the plan change was approved, all lots in a subsequent subdivision and any sites in a development within the urban limits would be subject to Rule 15.4.2.18 which requires a connection to water supply for firefighting purposes. The subsequent advice note specifies:

*“SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice sets out a number of options to provide water for the New Zealand Fire Service's operational requirements, and shall be used as a guide when designing fire fighting water protection”.*

To this extent, Fire and Emergency support the extension of the urban limit to include C9 and ‘Area 6’ and note that water supply being designed for FW2 could support the use of sprinkler systems for fire detection and prevention in the Industrial Zone. However, there will still be a requirement to assess the need for onsite water supply storage to ensure a compliant sprinkler system.

To manage fire risk in the Hautapu Structure Plan area, Fire and Emergency request that Council ensure that their current resource consent process ensures that all future subdivision and land use applications within the Hautapu Structure Plan area are suitably conditioned to ensure that adequate onsite storage is provided for at the time of development commencing, to provide Fire and Emergency certainty that enough firefighting water supply will be available in a fire emergency. If this does not become part of the consenting regime, there will likely be development with inadequate firefighting water supply with potentially serious consequences for life and property, with this risk increasing as a result of climate change impacting on existing water sources, and other environmental and demographic changes across communities of which fire will present a greater and more frequent risk.

Fire and Emergency also note the risk to level of service to the Waipa community. If Fire and Emergency, using the already inadequate water supply need to take water from the network for firefighting purposes for a medium/long duration incident, this could mean that other users on that water supply system will be placed at risk of lower to no water for their normal day to day operations during incident response.

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

1. Fire and Emergency seek that Council do not enable development within the Hautapu Structure Plan area unless it is matched with the delivery of key water infrastructure (reservoirs, network extensions or upgrades), or development is not enabled where there is



potential or known infrastructure capacity constraints in relation to the water supply network (unless the development itself includes necessary upgrades or additional storage).

2. Fire and Emergency also seek a new policy in Section 7 Industrial Zone as follows:

*Policy 7.3.4.11 To ensure that all subdivision and development within the Hautapu Structure Plan area is provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.*

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

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'Daryl Trim', written over a light blue circular stamp.

**Daryl Trim**  
District Manager  
Waikato Fire District

**From:** [Alec Duncan](#)  
**To:** [Policy Shared](#)  
**Subject:** External Sender: FW: Fire and Emergency New Zealand Submission - Proposed Plan Change 17 - 10.11.2022  
**Date:** Tuesday, 15 November 2022 8:31:59 am  
**Attachments:** [image002.png](#)  
[Fire and Emergency New Zealand Submission - Proposed Plan Change 17 - 10.11.2022.pdf](#)

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Kia ora,

Please see below and attached Fire and Emergency New Zealand's submission on Proposed Plan Change 17. It was sent to Waipa on Thursday 10 November, however I understand it was not received. This may have been due to the automated macron in the email address.

It would be much appreciated if you could accept the attached submission.

Ngā mihi,

**Alec Duncan**

Planner

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**From:** Trim, Daryl <Daryl.Trim@fireandemergency.nz>  
**Sent:** Monday, 14 November 2022 4:58 pm  
**To:** Alec Duncan <alec.duncan@beca.com>  
**Subject:** FW: Fire and Emergency New Zealand Submission - Proposed Plan Change 17 - 10.11.2022

FYI

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**From:** Trim, Daryl  
**Sent:** Thursday, 10 November 2022 5:12 pm  
**To:** [districtplan@waipādc.govt.nz](mailto:districtplan@waipādc.govt.nz)  
**Subject:** Fire and Emergency New Zealand Submission - Proposed Plan Change 17 - 10.11.2022

Kia ora,

Please see attached Fire and Emergency New Zealand's submission on Proposed Plan Change 17 to the Waipa District Plan.

We would welcome the opportunity to work with Waipa District Council on the matters raised within the submission, prior to the hearing.

Ka nui te mihi

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 Kaiwhakahaere patu ahi o Waikato  
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