

From: [Alec Duncan](#)
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Subject: External Sender: Fire and Emergency New Zealand submission - Plan Change 20 – Airport Northern Precinct Extension
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[Fire and Emergency New Zealand Submission - Waipa District Council - Proposed Plan Change 20 - 28.10.2022.pdf](#)

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Kia ora,

On behalf of Fire and Emergency New Zealand, please see **attached** submission on 'Plan Change 20 – Airport Northern Precinct Extension' to the Waipa District Plan.

Fire and Emergency will look to engage directly with the Applicant's consultant, Harrison Grierson on the water supply matter to try and build a positive problem-solving approach, with the aim that the issues raised within will be resolved prior to the hearing.

Should you have any questions, please let me know.

Ngā mihi,

Alec Duncan

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Waipā District Plan

Submission on notified Private Plan Change 20

Form 5

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

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This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) on Private Plan Change 20 – Airport Northern Precinct Extension.

- 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 private 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 environment¹.

Fire and Emergency's main functions² 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.

¹ Fire and Emergency New Zealand Act 2017 section 10(a)(b)

² 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 functions³ 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.⁴

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.

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

³ Fire and Emergency New Zealand Act 2017 section 12(3)

⁴ 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)

required by the New Zealand Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008), alternative water sources and/or additional 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 Infrastructure Assessment prepared by Harrison Grierson, the assessment has determined that the Northern Precinct is capable of being serviced with firefighting water supply provided from the Pukerimu Water Supply scheme with onsite reservoirs and booster pumps. Section 4.1.4 assumes the development will be reticulated to meet an FW3 level of service for firefighting and further states that hydraulic modelling of the full water reticulation is to be carried out as part of the detailed design process to identify the locations of reservoirs and booster pump stations and the possibility of combined storage within the full development.

Fire and Emergency support the water supply being designed for FW3 to the extent that this level of service would support and promote the use of sprinkler systems for fire detection and prevention in the Airport Business Zone. This is particularly important as the distance to the Northern Precinct (and wider Airport Business Zone) from the nearest fire station would take responding fire appliances more than 10 minutes to arrive onsite before any additional fire suppression can take place. However, Fire and Emergency note that existing developments in other precincts which are serviced, in many cases, have been designed without installation of sprinkler systems (regardless of size), nor have they provided sufficient additional firefighting water supply where required.

Fire and Emergency recognise that Chapter 15 of the Waipā District Plan requires subdivision and development to connect to the reticulated network, however, as the plan change area is not located in the urban limits, rule 15.4.2.18 does not apply. The default rule 15.4.2.23 applies to subdivision and development where water is not supplied by Council or a private community supply, or water is supplied by Council but is a restricted flow supply. This rule is unlikely to be applicable as the plan change area will be serviced and has been assumed to be reticulated for FW3. Further, this rule sets out the prescribed minimum requirements for residential dwellings (FW2) and therefore would not be appropriate for commercial or industrial developments.

Fire and Emergency further note that Section 6.1.3 of Regional Infrastructure Technical Specifications (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”*.

As such, there does not appear to be a requirement in the Waipā District Plan or the proposed plan change provisions that requires subdivision and development in the Business Airport Zone to provide a firefighting water supply in accordance with SNZ PAS 4509:2008.

As it is understood that further details on how the Northern Precinct can be serviced will be investigated during the resource consent/detailed design process, there is a risk that the resource consent process will not adequately address firefighting water supply servicing or require additional levels of service, if and when

required. In particular, this approach makes it less likely that a holistic solution to providing for firefighting water supply will be implemented.

To manage fire risk in the Airport Business Zone, Fire and Emergency considers that all subsequent subdivision and development should be subject to development standards within the Waipā District Plan requiring all developments to demonstrate that they can be adequately serviced for firefighting water supply in accordance with the SNZ PAS 4509:2008. 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 seeks the following decision from Council:

1. Fire and Emergency request that Council do not enable development within the proposed zone extension of the Airport Business Zone unless it is matched with the delivery of key water strategic 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).
2. Fire and Emergency also seek a specific rule in the Waipā District Plan via proposed plan change 20 requiring all development and subdivision in the Airport Business Zone to provide additional firefighting water supply in accordance with SNZ PAS 4509:2008. This would include the provision of additional supply over and above what is provided via the reticulated network where a higher level of service is required. This is sought under rule 15.4.2.87 as set out below:

Airport Business Zone

15.4.2.87 All development and subdivision in the Airport Business Zone shall comply with:

...

e. Water supply for firefighting purposes, to be provided in accordance with the New Zealand Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

Advice Note: 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 firefighting water protection.

This approach aligns with the requirements as set out in section 6.2.3.3 of RITS.

Alternatively, the reticulated water network could be designed to provide a higher level of service through the upsizing of infrastructure to either meet the likely requirements of SNZ PAS 4509:2008 for anticipated future developments or at least reduce volume of additional onsite water storage required by future developments.

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



Alec Duncan

Beca Limited

Dated: 28 October 2022