

Form 5

Submission on Private Plan Change 58:

Avenues Business Park

Proposed General Industrial Zone, Morrinsville

Schedule 1 of the Resource Management Act (RMA) 1991

To: Matamata-Piako District Council

Submitter's details:

Name: Fire and Emergency New Zealand
(Organisation / Individual)

Contact person: Nicola Hine (Consultant)
(If different from above)

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Phone: 078383828

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This is a submission on Private Plan Change 58: Avenues Business Park – Proposed General Industrial Zone, located on the western side of Morrinsville, between Avenue Road North and State Highway 26 (Lot 1 and 2 DPS 78100.

The specific provisions of the plan change that my submission relates to are: Please refer to attached written submission.

My submission is (include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views; attach additional pages if necessary): Please refer to attached written submission.

I seek the following decision from Council (please give precise details):

- Accept the plan change Decline the plan change
 Accept the plan change with the following amendments If the plan change is not declined, make the following amendments

Please refer to attached written submissions

I wish to present at the council planning hearing:

- Yes No

PLEASE NOTE: IF YOU DO NOT TICK EITHER "YES" OR "NO" ABOVE, THEN IT WILL BE ASSUMED THAT YOU DO NOT WISH TO BE HEARD.

I would be prepared to present a joint case at the hearing with others making a similar submission:

- Yes No

I could gain an advantage in trade competition through this submission.

- Yes No

If you could gain an advantage in trade competition through this submission please complete the following:

I am directly affected by an effect of the subject matter of this submission that—

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition

- Yes No

Signed:  Date: 17 July 2023

Notes:

- The submission and decision you wish Council to make should only relate to the contents of the proposed plan change
- Submissions close at **4.30pm, Monday 17 July 2023**.
- Please send the completed form before the closing date to: Matamata-Piako District Council, PO Box 266, Te Aroha or email to submissions@mpdc.govt.nz or complete online at [mpdc.nz/avenuebusinesspark](https://www.mpdc.govt.nz/avenuebusinesspark); or you can drop it off at any Council office.
- I accept that by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public. After the closing date, all submissions received will be available for public viewing.
- Privacy Policy for MPDC can be viewed on the MPDC website <https://www.mpdc.govt.nz/contact-us/privacy-policy>

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Matamata-Piako District Council

Submission on notified Private Plan Change 58

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: 07 838 3828
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Address for service: PO Box 448, Waikato Mail Centre

This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) on Private Plan Change 58 – Avenue Business Park – Proposed General Industrial Zone (PPC58).

- 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 **support the private plan change request, subject to consideration of the matters raised 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 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.

Matamata-Piako 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 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.

SNZ PAS 4509:2008 establishes the minimum firefighting water supply that is required for the fire hazards, and this is based on an assessment of water supplies needed to fight a fire and limit fire spread. The water supply calculations depend on the fire hazard category; and factors such as sprinklered or non-sprinklered structures, use of the structure, and floor area are taken into account (among other matters).

Fire and Emergency understand that this plan change area (approximately 13.4ha) will be connected to the reticulated water supply from Avenue North Road via the Avenue Business Park Development (which is currently under construction). Council have indicated that water supply to the plan change area is available, particularly as the new bore and Water Treatment Plant planned for the Lockerbie development area are expected to come online by December 2023 (as set out in paragraph 7.1.2 of the 'Request for Plan Change' document produced by Monocle).

The Infrastructure Report prepared by Textus Consultants Limited (Textus) states that PPC58 is proposed to be designed in accordance with Regional Infrastructure Technical Specifications (RITS) and that the reticulated network will be designed to supply FW3 firefighting water supply.

Furthermore, Section 5.9.1 of the Matamata-Piako District Plan requires any subdivision or development to connect to the Council's water reticulation system, in compliance with the Development Manual, where a reticulated supply is available.

However, of concern to Fire and Emergency is that the applicant's preliminary hydraulic modelling suggests that FW3 is not likely to be met for the high-lying areas with the existing available pressure within the Avenue Road water supply network. Section 6 of the Infrastructure Assessment states:

'To achieve FW3, the pressure within the existing system will need to be increased or locally boosted for the high-lying areas via a water supply pump. Alternatively, the high-lying areas could remain FW2 (with a RITS dispensation) with site specific fire safety designs for future developments that will comply with SNZ PAS 4509:2008, by utilising sprinklers, fire cell limits etc. This is proposed to be addressed at resource consent process and detailed design.'

While a reticulated network is proposed to be available within the PPC58 development area for allotments to connect to, the reticulated water supply will not meet minimum firefighting water supply for industrial use.

Fire and Emergency further 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".

To manage fire risk in the plan change area, Fire and Emergency wish to ensure that all subsequent subdivision and development is subject to development standards within the District Plan which require 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 seek that Council do not enable development within the plan change area unless it is matched with the delivery of key water infrastructure 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 District Plan via PPC58 requiring all development in the plan change area to provide 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. Sprinkler systems are strongly promoted by Fire and Emergency in this regard as a means of fire protection. This is sought through Part B – Appendix 9: Schedule of Works / 9.6 Avenue Business Park Development Area Plan / Section 9.6.4 Three Waters as set out below:

Water

Subdivision and development within the ADAP will require the following water infrastructure and design considerations:

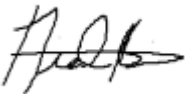
c) All buildings must be designed in accordance with the New Zealand Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

Advice Note: The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 sets out a number of options to provide water for Fire and Emergency New Zealand's operational requirements and shall be used as a guide when designing firefighting water protection. It should be noted that additional onsite private storage for firefighting may also be required.

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



Nicola Hine

Beca Limited

Dated: 17 July 2023