

Matamata-Piako District Plan

Submission on notified Private Plan Change 57

Form 5

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

Submitter: Fire and Emergency New Zealand
Contact name: Alec Duncan (Consultant)
Contact number: 07 960 7259
Email: alec.duncan@beca.com
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 57 – Calcutta Industrial Zone

- 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 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.

Fire and Emergency understand that this plan change area (~41ha) is only the first stage of the Calcutta Master Plan development that covers a 250ha pocket of land of which the concept indicates will include low-medium housing, living zone as well as an employment zone.

Based on the Infrastructure Assessment prepared by Bloxam Burnett and Olliver (BBO), Council has confirmed there is no water supply capacity available in the existing reticulated network to service the plan change site. The assessment confirms that the preferred option would therefore be to utilise existing groundwater bores located on the wider site to service the area. For firefighting water supply, this would require a dedicated reservoir (tank) and pump of which BBO has indicated would be trickle fed from the bore or potentially making use of the stormwater ponds for firefighting purposes.

Fire and Emergency note that the utilisation of the stormwater ponds for firefighting purposes may only service the southern buildings and access and continued supply would be key. Fire and Emergency would be happy to work with the plan change proponent on this potential alternative solution.

As set out in section 4.5 of the Infrastructure Assessment, BBO note the Council Development Manual sets out the design and construction standards for water reticulation, potable water supply and firefighting supply in accordance with SNZ PAS 4509:2008. BBO note the network will be designed to FW3 in accordance with SNZ PAS 4509:2008 and located in the road reserve berms with sluice valves and hydrants located at appropriate locations throughout as required by the Regional Infrastructure Technical Specifications (RITS).

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 Industrial Zone. However, where new developments choose not to install sprinkler systems, additional firefighting water supply such as onsite private storage will likely be required, and this would generally be based on the fire cell (building footprint) and fire hazard category.

Of concern to Fire and Emergency, section 4.6 of the Infrastructure Assessment states, "*The firefighting water requirements for individual buildings will be accessed during the building consent process. If this identifies that demand exceeds FW3 then the additional supply shall be provided by a privately owned and maintained on lot system, such as a tank and pump*". Fire and Emergency note that the building consent process does not require provision of, or consideration of, firefighting water supply. It will therefore be important that this additional supply is determined at the time of resource consent (or prior) to ensure that this additional supply is provided and considered during the design process.

Fire and Emergency recognise that Section 5.9.1 of the District Plan requires any subdivision or development to connect to Council's water reticulation system, in compliance with the Development Manual where one is available. Fire and Emergency understand that this performance standard does not apply to existing or future on-site, self-serviced water supply infrastructure on Development Concept Plan sites insofar that Section 5.9.1 refers to the Development Manual, however understand that a 'Development Area Plan' is proposed (not a 'Development Concept Plan') and therefore this performance standard would still apply to the plan change area. However, as the details around the reticulated water supply have not been confirmed, including future ownership arrangements (i.e. private or to be vested in Council), should the water

supply network remain in private ownership, there is a risk to Fire and Emergency that Council would not have the ability to control capacity or require future developments to connect to a private supply network through the future resource consent process. This would also remove the ability for Council to require future developments to provide additional private onsite storage, should this be required.

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 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 seek that Council do not enable development within the plan change area unless it is matched with the delivery of key water infrastructure (reservoir storage and pumps), 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 proposed plan change 57 requiring all development and subdivision in the plan change area 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 through Part 6 – Appendix 9: Schedule of Works / 9.5 Calcutta Development Area Plan / Section 9.5.9 as set out below:

9.5.9 Water

c) *An internal reticulation network designed to comply with the requirements of 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 the New Zealand Fire Service'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.

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

A handwritten signature in black ink, appearing to read 'Alec Duncan', written in a cursive style.

Alec Duncan

Beca Limited

Dated: 8 November 2022