

SCANNED



## FORM 5

### SUBMISSION ON A PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN UNDER CLAUSE 6 OF THE FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

To: Wanganui District Council

Submission on: Proposed District Plan Changes 36 & 37

Name of submitter: New Zealand Fire Service Commission (the NZFS Commission)

Address for service: C/- Beca Group Ltd  
PO Box 3942  
WELLINGTON 6140

Attention: Alexandra Strawbridge

Phone: 04 550 5995

Email: alexandra.strawbridge@beca.com

**This is a submission on Proposed Plan Changes 36 & 37 to the Wanganui District Plan.**

**The NZFS Commission is not a Trade Competitor to this Proposal.**

**The specific parts of the Proposed Plan that the NZFS Commission's submission relates to are:**

- Aspects of the Proposed Plan that may impact on the operations of the NZFS Commission, including the provision of sufficient water supply for firefighting purposes, and physical access for fire appliances.

#### **Background:**

In achieving the sustainable management of natural and physical resources under the RMA 1991, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The NZFS Commission has a responsibility under the Fire Service Act 1975 to provide for firefighting activities in a safe, effective and efficient manner. As such, the NZFS Commission monitors development occurring under the RMA 1991 to ensure that, where necessary, a submission is made which promotes the consideration of fire safety.

The NZFS Commission's main areas of concern are the provision of a water supply and access to enable the New Zealand Fire Service (NZFS) to operate effectively and efficiently. In order to achieve this, the NZFS Commission seeks compliance with the New Zealand Standard for the provision of firefighting water supply and access, known as the *New Zealand Fire Service*

*Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008* (the NZFS Code). The NZFS Code sets out standards for water supply and access design which meet the operational requirements of the NZFS for both reticulated and non-reticulated areas.

The NZFS Commission has been involved in the Wanganui District Plan Review process, as a submitter on Plan Change 27 – Subdivision, Earthworks and Infrastructure. The NZFS Commission was largely in support of the proposed provisions for the Subdivision and Infrastructure chapter. In particular it supported the requirements for lots with a connection to the reticulated water network to comply with the NZFS Code, or the ability to comply with the NZFS Code for sites without reticulated water supply. The NZFS Commission has appreciated the Council's positive position towards providing for the operational needs of the NZFS across the District with the aim of assisting the NZFS in responding to structural fire emergencies effectively and efficiently.

In this submission, the NZFS Commission raises some remaining concerns relating to the provision of adequate fire fighting water supplies in areas that cannot be connected to a reticulated water network. These concerns and requested actions are set out in detail in the sections below.

**The NZFS Commission's submission is:**

The specific amendments, additions or retentions sought are outlined below:

1. Provision of adequate firefighting water supply in remaining Rural Zones at the point of subdivision

In its submission on Plan Change 27, the NZFS Commission supported what is now Rule 11.5.7 – Site Serviceability. This Rule requires all new allotments to connect to reticulated water services excluding the Rural B Zone which shall demonstrate the ability to comply with the NZFS Code.

In its original submission on Plan Change 27, the NZFS Commission requested that this rule be made applicable to all the Rural Zones to ensure that all non-reticulated development considers compliance with the NZFS Code at the point of subdivision. After subsequent discussions with the Council, the NZFS Commission understood that this addition would be dealt with under the Plan Change that addresses the Rural Zone (i.e. Plan Change 36).

Upon review of Plan Change 36, it does not appear that these changes have been proposed. The NZFS Commission therefore requests that the remaining Rural Zones be added to Rule 11.5.7, being Rural A, Rural C and Rural Settlement. The NZFS Commission considers that requiring all non-reticulated subdivision to demonstrate the ability to comply with the NZFS Code would provide a consistent approach (rather than this only being required for subdivision in the Rural B Zone). This approach is

especially relevant, as it is noted that, under proposed Policy 3.3.2, the Council is not considering extending urban reticulated infrastructure to any new allotments within these Zones.

The NZFS Commission therefore requests that **additions** be made to the following provision of the District Plan:

- Proposed Plan Change 36: Rural – Chapter 11: Subdivision and Infrastructure – 11.5: Performance Standards-Subdivision - Rule 11.5.6: Site serviceability:

*“a. Each new allotment shall connect to reticulated water services (sewer, stormwater and water supply) excluding the Rural A, Rural B, Rural C and Rural Settlement zones which shall be required to demonstrate it can provide those services within the proposed allotment.*

...

*d. For sites in the Rural A, Rural B, Rural C and Rural Settlement zones applications shall:*

*i. Provide secure suitable non-reticulated levels of service for potable water supply.*

*ii. Demonstrate the ability to comply with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.”*

2. Provision of adequate firefighting water supply to developments that do not involve subdivision

With the addition of the requested additions above, the NZFS Commission is satisfied that its operational requirements will be considered in all areas of the District at the point of subdivision.

However, the NZFS Commission is also concerned with development that may take place separately to the subdivision process in areas of the District with no connection to a reticulated water supply. This includes the construction of dwellings and other commercial and industrial structures with a high occupancy (but excluding uninhabitable rural farm and horticultural structures etc.) that may take place in the Rural Environment (the NZFS Code can be applied to all these types of structural development).

While the NZFS Commission is concerned with all new development in non-reticulated areas, the type of development allowed through Plan Change 37 (Papakainga) is an example of a situation where potentially extensive development could take place which is not caught under Rule 11.5.6 (above). These types of development (as well as other non-reticulated development) are therefore not currently required to demonstrate the ability to comply with the NZFS Code.

The NZFS Commission is not opposed to Plan Change 37 to allow for Papakainga developments; however, in order to promote the protection of lives, property and the surrounding environment, it requests that **additions** be made to the following proposed provisions of the Rural Environment chapter:

- Proposed Plan Change 36: Rural – Chapter 3: Rural Environment – 3.5 Performance Standards (*Rural A Zone*) – 3.5.5 Structures:

*(e) All new habitable structures to be used for residential, commercial or industrial purposes shall be provided with a fire fighting water supply and access to this supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.*

- Proposed Plan Change 36: Rural – Chapter 3: Rural Environment – 3.7 Performance Standards (*Rural B Zone*):

**3.7.8 Structures:**

*(a) All new habitable structures to be used for residential, commercial or industrial purposes shall be provided with a fire fighting water supply and access to this supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.*

- Proposed Plan Change 36: Rural – Chapter 3: Rural Environment – 3.9 Performance Standards (*Rural C Zone*) – 3.9.5 Structures:

*(e) All new habitable structures to be used for residential, commercial or industrial purposes shall be provided with a fire fighting water supply and access to this supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.*

- Proposed Plan Change 36: Rural – Chapter 3: Rural Environment – 3.11 Performance Standards (*Rural Settlement Zone*) – 3.11.5 Structures:

*(j) All new habitable structures to be used for residential, commercial or industrial purposes shall be provided with a fire fighting water supply and access to this supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.*

The NZFS Commission understands that, while the intention of Plan Change 37 is to make Papakainga development more allowable, the development is still required to comply with the Performance Standards of the relevant zone. Where these developments are to be located within any Rural Zone, the NZFS Commission then understands that the rules referred to above would still apply to Papakainga development.

**The NZFS Commission seeks the following decision from the consent authority:**

That, if Proposed Plan Change 36 is approved, the above additions requested by the NZFS Commission be included in the final wording (which would also address the concerns of the NZFS Commission relating to Plan Change 37).

The NZFS Commission has qualified staff, experienced in all aspects of this submission, and would be happy to assist and/or advise in any way possible.

**The NZFS Commission wishes to be heard in support of their submission.**

**The NZFS Commission is not prepared to consider presenting a joint case at the hearing.**



*(Signature of person authorised to sign on behalf of New Zealand Fire Service)*

3/6/14

**Date**

