

## Form 5

## Submission on Private Plan Change to Kaipara District Plan

## Clause 6 of Schedule 1, Resource Management Act 1991

**To:** Kaipara District Council

**Submission on:** Proposed Private Plan Change 82: Moonlight Heights

**Name of Submitter:** Fire and Emergency New Zealand

This is a submission on the following proposed plan change (the **proposal**): Proposed Private Plan Change 82: Moonlight Heights. The applicant requests to change the zoning of the Plan Change area (approximately 39.2 hectares) from Rural Zone to Residential Zone. This submission is written on behalf of Fire and Emergency New Zealand (Fire and Emergency).

Fire and Emergency could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that Fire and Emergency's submission relates to is:

- Whether the proposal will require sufficient water supply infrastructure for firefighting to service the Plan Change area.

**Fire and Emergency's submission is:**

In achieving the sustainable management of natural and physical resources under the Resource Management Act 1991 (RMA), 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 risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in plan changes to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements. 17.1

In order for Fire and Emergency to achieve their principal objectives which includes reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property, land, and the environment, Fire and Emergency requires adequate water supply and water pressure be available for firefighting activities.

The provision for adequate water supply (whether reticulated or non-reticulated) is therefore critical for any new subdivision or land use. This essential emergency supply provides for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA. 17.2

The water supply assessment for this proposal found that there is likely to be insufficient pressure to meet fire flow requirements for subsequent development of the site. Given these significant concerns, Fire and Emergency support Policy 2 '*there is sufficient infrastructure to accommodate the development*' of the Awakino Precinct in that firefighting water supply and pressure are an element of 'sufficient infrastructure'.

The Precinct proposes removing the requirement to comply with general residential subdivision rule 13.11.1 that has subdivision as a controlled activity with a matter of control "*that site(s) is adequately serviced and/or services on-site are managed, in particular the extent to which: ... sufficient firefighting water supply is* 17.3

available, taking into account a risk based assessment (refer to Note 8)” (13.11.1 Matter of Control (ii)). This wording was agreed through Environment Court mediations between Kaipara District Council and Fire and Emergency New Zealand (ENV-2018-AKL-00012). Fire and Emergency consider that it is essential this reference to sufficient firefighting water supply is maintained through the plan change.

Fire and Emergency maintain their position that a 3m vehicle access and driveway width for up to 6 dwellings is inadequate for firefighting access in the case of a fire and is not in accordance with SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.

17.4

**Fire and Emergency seek the following decision from the local authority:**

If Council are minded to approve the plan change, Fire and Emergency seek amendments to the Awakino Precinct provisions as discussed above to retain the wording agreed in ENV-2018-AKL-00012 that includes consideration of sufficient firefighting water supply for subdivision.

17.5

Fire and Emergency wishes to be heard in support of its submission.



Signature of person authorised to sign on behalf of  
**Fire and Emergency**

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