

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 81: Dargaville Racecourse

Name of Submitter: Fire and Emergency New Zealand

This is a submission on the following proposed plan change (the **proposal**): Proposed Private Plan Change 81: Dargaville Racecourse. The applicant requests to change the zoning of the Plan Change area (approximately 47 hectares) from Rural Zone to a mix of Residential, Light Industrial, Neighbourhood Centre and Open Space Zones. 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 water supply infrastructure for firefighting will be in accordance with the requirements of the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Water Supplies Code of practice) 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 the land use provisions of the District Plan to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

8.1

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 be available for firefighting activities; and adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies.

The provision for adequate water supply is therefore critical. It is important to Fire and Emergency that any new subdivision or land use has access to adequate water supply (whether reticulated or non-reticulated). This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA.

The proposal's civil engineering assessment notes that the proposed connection to the reticulated Council water supply may not meet firefighting flows at adequate pressure to service the development and so further design/analysis will be required at development stage to ensure adequate provision of water for firefighting purposes.

8.2

The Proposed Plan Change provides for on-site water collection as a means of increasing resilience. In particular, the Large Lot Residential Area would not be connected to Council's reticulated system and instead would rely on on-site water collection and storage by way of rainwater harvesting and groundwater supply. Fire and Emergency support the enablement of on-site collection and storage as a way to mitigate the impacts of droughts but for these to be adequate for firefighting they must be designed in accordance with SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.

Given this, Fire and Emergency support *Policy 12: Ensure that the Trifecta Development Area is serviced by appropriate infrastructure* and consider that its implementation could be strengthened through further reference to firefighting needs as detailed in Appendix A.

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

Fire and Emergency request the amendments noted in the Appendix below.

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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Appendix A – requested amendments

The following table sets out the specific amendments sought by Fire and Emergency. These amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Provision	Support / Oppose	Reasoning	Requested amendment	
1	TDA-SUB-S1 Subdivision into Super Lots ... <i>Compliance Standard:</i> <i>1. Subdivision of Super Lots is exempt from all other subdivision rules in the Trifecta Development Area chapter provided that the Super Lot has road frontage.</i>	Oppose in part	To strengthen implementation of Policy 12 Fire and Emergency request explicit reference to emergency servicing needs.	<i>Compliance Standard:</i> <i>1. Subdivision of Super Lots is exempt from all other subdivision rules in the Trifecta Development Area chapter <u>other than TDA-SUB-R9</u> provided that the Super Lot has road frontage.</i>	8.4
2	TDA-SUB-S10 Transport	Support in part		<u>5. Every allotment provides for emergency service response access.</u>	8.5
3	TDA-SUB-S11 Three Waters	Support in part		<i>Matters of discretion:</i> <i>1. TDA-SUB-S13 Matters of Control and Discretion.</i> <i>2. The capacity of the existing reticulated wastewater and water supply network.</i> <i>3. Whether the servicing needs of the proposal require upgrades to existing infrastructure.</i> <i>4. Feasibility of connection to and logical extension of the existing reticulated wastewater and water supply network.</i> <i>5. Provision of wastewater collection, treatment and disposal.</i> <i>6. The efficient provision of services within the Development Area to any future development stage.</i> <i>7. Effects on environmental and cultural values from the management and discharge of stormwater and wastewater.</i>	8.6

			<p>8. The provision of integrated low impact or water sensitive stormwater design.</p> <p>9. Consistency with an approved Stormwater Management Plan under rule TDA-LU-R3 Any Activity and TDA-LU-S5 Three Waters.</p> <p><u>10. Provision of firefighting water supply in accordance with SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</u></p>	
4	TDA-SUB-S13 Matters of Control and Discretion	Support in part	<p>6. The provision, location, design, capacity, connection, upgrading, staging and integration of infrastructure <u>(including for emergency service responses)</u>, and how any adverse effects on existing infrastructure are managed.</p>	8.7
5	TDA-LU-S4 Transport	Support in part	<p>Matters of discretion:</p> <ol style="list-style-type: none"> 1. Efficient and effective transport network. 2. Urban design of the General Residential Area, Neighbourhood Centre Area and Hauora Open Space Area. 3. Traffic safety in relation to site ingress and egress. 4. Pedestrian and cyclist safety and navigability. 5. Consistency with an approved Access Plan under TDA-SUB-S10 Transport. 6. Consideration of street trees and entrance treatments for the Awakino Point North Road entrances. 7. Results of any consultation with tangata whenua with respect to street naming. <p><u>8. Provision for emergency service response access.</u></p>	8.8
6	TDA-LU-S5 Three Waters	Support in part	<ol style="list-style-type: none"> 1. Every residential unit and minor residential unit in the Large Lot Residential Area is connected to on-site wastewater and on-site water supply. 2. Every residential unit in the General Residential Area is connected to reticulated wastewater and reticulated water supply. 3. Every building in the Light Industrial Area and Neighbourhood Centre Area is connected to reticulated wastewater and reticulated water supply. 	8.9

4. Any public toilet in the Open Space Area is connected to reticulated wastewater and reticulated water supply.

5. Prior to establishment of any activity other than Farming in the Light Industrial Area and Neighbourhood Centre Area and prior to occupation of any residential unit in the General Residential Area or Large Lot Residential Area:

a. A Stormwater Management Plan shall be prepared by a suitably qualified and experienced engineer to delineate the Blue Green Open Space Area/s, unless a Stormwater Management Plan has already been approved under TDA-SUB-S11 Three Waters.

6. Where reticulated water supply does not provide adequate water supply and pressure for firefighting, an alternative firefighting water supply is provided in accordance with SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.

Note:

1. The Development Area Plan will be updated to delete the indicative Blue Green Network and fix the location of the Blue Green Open Space Area/s.