

## Form 5

### **Submission on Proposed Plan Change 14: Shannon Farm, Ripponvale Road, Cromwell – Central Otago District Council**

To: Central Otago District Council

Submission on: Plan Change 14 – Shannon Farm, Ripponvale Road

**Name of submitter: Fire and Emergency New Zealand (FENZ)**

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This is a submission on behalf of Fire and Emergency New Zealand (FENZ) concerning proposed Private Plan Change 14 to the Central Otago District Plan (hereafter “PC14”).

The Fire and Emergency New Zealand Act 2017 (FENZ Act) established FENZ from 1 July 2017. FENZ was created from the previous New Zealand Fire Service Commission, the New Zealand Fire Service, the National Rural Fire Authority, and 38 other Rural Fire Authorities. The FENZ Act, among other matters, replaced the two previous governing Acts (the Fire Service Act 1975 and the Forest and Rural Fire Act 1977) to create a single, unified fire services organisation for New Zealand. The FENZ Act establishes the governance, management and operational arrangements for protecting life and property from fire and other emergencies in New Zealand.

FENZ recognises the importance of the proposed PC14 in enabling additional housing and managing future development in the Central Otago District.

The purpose of the Resource Management Act 1991 (RMA) is to promote the sustainable management of natural and physical resources, which includes enabling people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. The risk of fire represents a potential adverse effect of low probability but high potential impact. FENZ has a responsibility under the FENZ Act to reduce the incidence of unwanted fire and the associated risk to life and property. As such, FENZ monitors changes in statutory planning documents occurring under the RMA to ensure that, where necessary, appropriate consideration is given to fire safety.

FENZ's role includes promoting fire safety and fire prevention, and extinguishing fires. PC14 provides an opportunity to better facilitate these activities, by including appropriate provisions which will enable people and communities to provide for their health and safety with regard to fire safety, fire prevention, and fire extinction.

### **Adequate water supply and access for firefighting activities:**

The provision of adequate firefighting water supply and firefighting access is critical. It is important to FENZ that any new dwelling or land use that does not have access to a reticulated water supply has access to an adequate firefighting water supply of some kind. This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore achieve the purpose of the RMA.

The New Zealand Firefighting Code of Practice SNZ/PAS 4509:2008 (Code of Practice) is a non-mandatory New Zealand Standard that sets out the requirements for firefighting water and access. The Code of Practice enables a consistent approach throughout New Zealand and allows FENZ to operate effectively and efficiently in a fire emergency. FENZ considers that the best way to provide a consistent approach to mitigating the actual and potential effects of fire across the district is to include specific standards in district plans.

### **Proposed PPC14 additions relevant to FENZ:**

PC14 seeks to rezone land to the west of Cromwell, known as 'Shannon Farm' along Ripponvale Road, to a new Rural Resource Area (5) zone, to expand existing horticultural development, provide greater protection of the Pisa Range hill area and provide a rural lifestyle community. It proposes an additional policy, rules and amendments to the relevant planning maps.

The proposed new policy is for *Integrated Rural Lifestyle Subdivision and Development within Rural Resource Area (5)* and provides for rural lifestyle subdivision and development by enabling rural lifestyle subdivision and development, providing for a range of densities and diversification of living opportunities. All development that occurs within the newly zoned area will be subject to what is outlined in the new rules and the proposed Structure Plans.

PC14 states that the majority of the plan change area can be connected to the Cromwell reticulated water supply, through the installation of a new 150mm main along Ripponvale Road. There are no requirements within the existing District Plan provisions which require newly subdivided properties to provide a firefighting water supply in accordance with the requirements of the Code of Practice. It is however noted that FENZ has a Memorandum of Understanding (MoU) with Central Otago District Council which states that *"At the time a dwelling is erected on any building platform, domestic water and fire fighting storage is to be provided"*,

While the MoU is welcome, the lack of rules or standards in the District Plan means that Council would have limited ability to require firefighting water supply to be provided to newly created lots. FENZ considers that specific standards for firefighting water supply are needed to provide certainty and, ultimately, to manage the fire risk from new development in the PC14 area.

### **FENZ seeks the following decision from the local authority:**

FENZ supports the proposed PC14 in part, subject to amendments being made. FENZ seeks the following amendments:

- That Rule 4.7.2(ii)(vi) be amended to say
 

*For an application for resource consent made under Rule 4.7.2 (ii) such subdivision shall provide:*

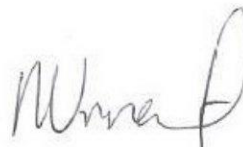
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  - *A water supply connection to newly created lots or dwellings, that complies with the provisions set out in the New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008.*

**FENZ could not gain an advantage in trade competition through this submission.**

**FENZ wishes to be heard in support of its submission.**

**If others make a similar submission FENZ will consider presenting a joint case with them at a hearing.**



.....  
(Signature of person authorised to  
sign on behalf of Fire and  
Emergency New Zealand)

18/12/19

.....  
Date

Title and address for service of  
person making submission:

Fire and Emergency New Zealand  
c/o Beca Ltd

Attention:     Nicolle Vincent

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