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Form 13

Submission on application concerning resource consent that is subject to public notification by consent authority

To: Central Otago District Council

Submission on: Publicly Notified Resource Consent – Larksbay New Zealand Trustees Limited

Name of Submitter: Fire and Emergency New Zealand

This is a submission on behalf of Fire and Emergency New Zealand (Fire and Emergency) on a publicly notified application from Larksbay New Zealand Trustees Limited for a land use consent to construct a building platform at 6 Middleton Road, Tarras.

Fire and Emergency is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (RMA).

Fire and Emergency's submission is:

In achieving the sustainable management of natural and physical resources under the 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 monitors development occurring under the RMA to ensure that, where necessary, appropriate consideration is given to fire safety and to the general safety of the public.

The proposed activity should take into account the operational requirements of Fire and Emergency to adequately provide for firefighting activities in a safe, effective and efficient manner as required by the Fire and Emergency New Zealand Act 2017. This is particularly important for this resource consent application, due to the location and potential use of the site proposed which increases the risk and potential effects should a fire occur. Fire and Emergency therefore requires certainty over the details of water supply for firefighting purposes and suitable access for emergency vehicles.

Firefighting Water

The application states in *'Firefighting water will be provided by a suitable firefighting reserve maintained in tank(s) near a future dwelling. Council's standard conditions of consent requiring treatment of the water source and provision of a minimum 20,000l static fire-fighting water supply with appropriate connections and hard stand area are volunteered to be incorporated into a Covenant registered against the Record of Title'*

Further to above, the Engineering report provided with the application prepared by Civilised Ltd made the following comment:

A new tank near the building platform will need to be installed to serve as a firefighting reserve in accordance with the CODC Addendum to NZS4404:2004 (dated July 2008). A copy of the addendum is included with this report in Appendix D. This will consist of a 30,000 litre tank of which 20,000 litres is to be maintained at all times as a static firefighting reserve. In addition, vehicular access to adjacent to the tanks is to be

maintained at all times and a hardstand area constructed adjacent to the tank to allow a fire appliance to park and pump from the tank.

Fire and Emergency note that the above 20,000L as outlined in the Central Otago District Council addendum created as per the requirement of the Memorandum of Understanding is only related to dwellings not commercial premises as the site plans propose. This volume is not adequate and as it is not clear that sprinklers will be installed, storage capacity greater than 20,000L will be required to adequately service the development. Table 1 of SNZ PAS 4509:2008 provides a method for determining the required water supply classification and is based off a Fire Hazard Category (FHC). Table 1 should be read in conjunction with Table 2 which sets out the minimum water storage requirements.

Further to this, it is noted that on page 17, the applicant proposes landscape controls. Point 9 proposes that *'all water tanks shall be partially or wholly buried. If partially buried, tanks shall be of dark, recessive colours which meets the building colour controls. If partially buried, tanks shall be visually screened from lake views by planting'*.

The burying of tanks is not practical for when Fire and Emergency are needing to identify the tanks and for connecting to the couplings. As above, the requirements of accessing the firefighting water supply needs to be practical.

Fire Appliance Access

The application states that in Section 4.4 page 22 *Existing farm track will be upgraded to the building platform to provide for appropriate swale drainage and minimum council design standards for single residential activity" (p22) but then goes on to say that the access road be built to NZS4404 with a lane width of 2.5m excluding water table/berm. That should be adequate presuming vegetation is kept low and trimmed back to provide a 3.5-4m of clear corridor.*

To accommodate a fire appliance, access widths should have a minimum width of 4m wide and should allow for a 3.5 – 4m of clear corridor i.e. . vegetation along the corridor shall be kept trimmed and clear of the carriageway.

Further to the above, the radius and widths of the corners to ensure fire appliances can physically reach the building platform is required. An attachment with this submission has been included for clarity.

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

The resource consent application, being for accommodation and potentially commercial, without sufficient access to the building platform and fire fighting water supply has potential implications for Fire and Emergency in terms of emergency access and adequate firefighting water supply.

Fire and Emergency therefore strongly recommend the inclusion of a consent condition for firefighting water supplies and for access for firefighting appliances to be sufficient to meet the requirements outlined in SNZ PAS 4509:2008. The following condition is recommended to be placed on the consent:

- 1. That prior to the construction or habitation of any habitable building, adequate firefighting water and access, shall be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.*

Further to above, Fire and Emergency requests that the applicant engages early with Fire and Emergency during the building consent process. Involving Fire and Emergency early in the building consent process will

ensure that the firefighting water supply network is suitably designed (including locations of supply) for use by Fire and Emergency during an emergency, should one occur.

Fire and Emergency **wish to be heard** in support of its submission. If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at the hearing.

Fire and Emergency does not request, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.



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

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