

**Form 5****Submission on Proposed Plan Change 69: Nelson Tasman Land Development Manual - Tasman District Council**

To: Tasman District Council

Submission on: Plan Change 69 – Nelson Tasman Land Development Manual

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) on Plan Change 69 of the Tasman Resource Management Plan (hereafter "PC69") as notified by Tasman District Council.

The Fire and Emergency New Zealand Act 2017 (FENZ Act) established FENZ from 1 July 2017. FENZ is New Zealand's unified (i.e. urban and rural) fire and emergency service that has been reformed as a modern agency that is flexible, adaptable and efficient.

The FENZ Act establishes the governance, management and operational arrangements for protecting life and property from fire and other emergencies in New Zealand. As outlined in section 10 of the FENZ Act, the principal objectives of FENZ are to: reduce the incidence of unwanted fire and the associated risk to life and property, protect and preserve life, and prevent or limit injury, damage to property land, and the environment.

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. PC69 provides an opportunity to better facilitate these activities, by including appropriate rules 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 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 achieves 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 (rather than just the notified applications for resource consents) is to include specific standards in district plans.

**Proposed PC69 additions relevant to FENZ:**

PC69 seeks to amend the Tasman Resource Management Plan to give effect to aspects of the updated Nelson Tasman Land Development Manual. PC69 also addresses some matters relating to asset and infrastructure network resilience and re-notifies some parking provisions. FENZ supports the provisions in PC69 and the Nelson Tasman Land Development Manual relating to firefighting water supply, and access to this water supply.

The minimum carriageway widths for private accessways in the residential, rural lifestyle, and rural zones, set out in Table 4-13 of the Land Development Manual are insufficient for access by firefighting appliances.

Section 6.1 of the *New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008* requires that the minimum carriageway width of any road shall not be less than 4.0 metres. As an absolute minimum, firefighting appliances require accessways of at least 3.5 metres in width. It is sought that PC69 reflects this specific access requirement, to enable access by firefighting appliances to all dwellings in the event of an emergency.

**FENZ seeks the following decision from the consent authority:**

FENZ supports the proposed PC69 in part, subject to amendments being made.

FENZ seeks that the minimum carriageway width for all zones, for all roading and accessway types, is at least 3.5m, or where possible, 4.0m. This is to enable access for firefighting appliances to all dwellings. (1)

**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)

15/07/19

.....  
Date

Title and address for service of  
person making submission:

Fire and Emergency New Zealand  
c/o Beca Ltd

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