

Form 13

Submission on application concerning resource consent or esplanade strip that is subject to public notification or limited notification by consent authority

Sections 95A and 96 Resource Management Act 1991

To: Otago Regional Council

Name of submitter: Fire and Emergency New Zealand

This is a submission on an application from Onumai Enterprises (the applicant) for resource consents to alter and extend existing structures and to occupy the common marine and coastal area adjacent to 21 Marine Parade, Taieri Mouth (Application No. RM22.550).

Onumai Enterprises currently hold a coastal permit to occupy the coastal marine area with an existing wharf, storage shed, and two cool sheds. The applicant has applied for resource consents to extend and convert the existing structures for holiday accommodation purposes and to occupy the common marine and coastal area with these structures for the purpose of commercial, recreational and residential use.

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

Fire and Emergency is not directly affected by an effect of the subject matter of the submission that—

a. adversely affects the environment; and

The specific parts of the application that Fire and Emergency's submission relates to are:

- the provision of a firefighting water supply; and
- access to that supply.

Fire and Emergency's submission is:

Fire and Emergency is neutral to the proposal subject to the relief sought in this submission.

In achieving the sustainable management of natural and physical resources under the Resource Management Act (RMA 1991), 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 1991 to ensure that, where necessary, appropriate consideration is given to fire safety.

The site is located within an unreticulated area and the application does not make any reference as to how the proposed multi-purpose building will be provided with a firefighting water supply. As a new land use is proposed (residential accommodation) as part of the application, it is vital that a firefighting water supply with appropriate access is provided to protect life and property in the event of a fire emergency. Adequate capacity and pressure for activities can be determined through the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice)¹. The Code of Practice is a non-

mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access in order for Fire and Emergency to operate effectively and efficiently in an emergency.

There are a number of potential options which could provide a suitable firefighting water supply for the proposed multi-use building however the feasibility of each option will require further discussion between local Fire and Emergency representatives and the applicant.

The Regional Plan: Coast for Otago allows for the take of coastal water for firefighting purposes as a permitted activity. Therefore, the regional planning framework does enable Fire and Emergency to utilise coastal water in this location, however this is subject to practicality issues. Access to coastal water is reliant on tides and the proximity of access to open water relative to the location of the fire to allow for the solution demonstrated in Figure 1 below:

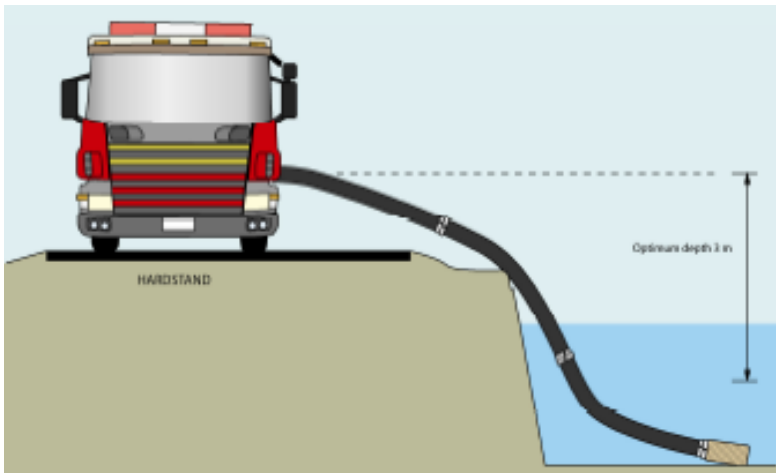


Figure 1: Example of a suction source firefighting water supply from an open water source¹.

The best option for Fire and Emergency to utilise coastal water is likely a siphon or piped intake below the water surface to a 100mm suction coupling at the roadside as shown in Figure 2 below. This option is reliant on the distances and clear zones being met.

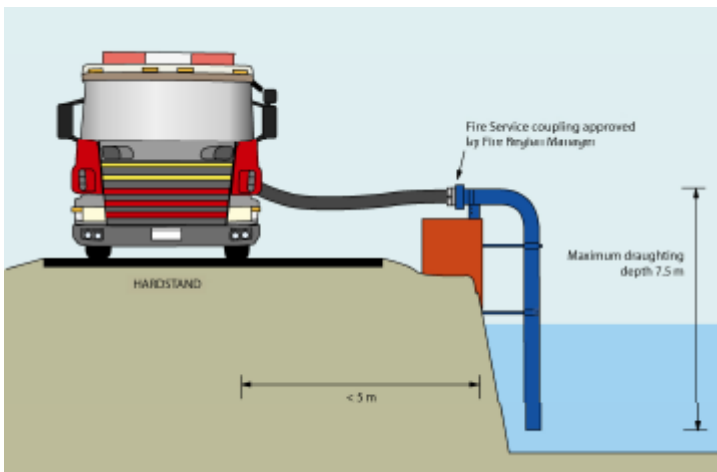


Figure 2: Example of a fixed static pick-up pump permanently fitted to an open water source for firefighting purposes².

¹ Page 28, Figure B1 of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

² Page 29, Figure B2 of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

These solutions require a hardstand for a fire appliance so that the appliance inlet is within 5m of the water supply, or the permanent fire service coupling, if fitted. The premises must also be within 90m of the water supply, or the permanent fire service coupling, if fitted.

An alternative option for firefighting water provision could include the installation of a sprinkler system in the buildings. A sprinkler system can reduce the spread of a fire through a building and substantially reduces the volume of water required for firefighting. In doing so, they provide the highest level of practical fire protection for residential buildings. Sprinkler systems should comply with Fire Sprinkler Systems for Houses SNZ 4517:2010.

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

That the proposed multi-purpose building is provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2009. As identified in this submission, there are a number of potential options available to provide a firefighting water supply which complies with the Code of Practice. Fire and Emergency are available free of charge to advise on means of compliance and the feasibility of each option.

Fire and Emergency would like to discuss the matters raised in this submission and provide advice on how to address these issues to ensure the protection of property and life, while maintaining the operational safety of fire crews and resources. Fire and Emergency would welcome any questions or further engagement on matters raised in the submission within.

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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