

Whangārei District Council
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8 November 2023

Dear Hearing Commissioner

Fire and Emergency New Zealand – Letter to be tabled for the Onoke Heights Hearing

Fire and Emergency New Zealand (Fire and Emergency) made a submission on the Onoke Heights resource consent application. Fire and Emergency will not be attending the hearing and requests that, in lieu of attendance, this letter be tabled for the Hearing Commissioners' consideration.

Fire and Emergency's Submission

Fire and Emergency were neutral to the application, subject to the matters raised in the submission being addressed. To summarise, the key relief sought by Fire and Emergency was in relation to:

- Provision for emergency service access
- Provisions for adequate firefighting water supply and pressure

Officers Report

The s42A report and supporting documents for the resource consent application have been reviewed. The following matters were raised by the reporting officer and/or development engineer:

Firefighting water supply:

- *All lots will be connected to the existing Council watermain with a reticulation system to be constructed as part of the proposed development, this design must be adequate for firefighting purposes and the design shall conform with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008. It was noted that although there is sufficient capacity, that water pressure may be unacceptable. It was later confirmed via flow tests that there is sufficient pressure available for firefighting supply. (Pg 7., Development Engineers Report)*
- *Recommended subdivision conditions: Design details of water connections for lots 1 to 93 in accordance with Sheet 46 or 47 of Council's Environmental Engineering Standards 2010 Edition including firefighting coverage in accordance with Sheet 45 and Section 6.11 (Pg.30, Development Engineers Report)*

Emergency access:

- *It is expected that Fire and Emergency NZ will be able to access all areas of the development as necessary for emergency purposes. (Para 53, Section 42A Report to Hearings Commissioner)*

Fire and Emergency Response

Fire and Emergency appreciates the extra detail provided on firefighting water pressure and confirm that this resolves their concerns on this matter. However, Fire and Emergency still have concerns with respect to the provisions for firefighting water supply and emergency access. These have an impact on Fire and Emergency's ability to operate efficiently and effectively within the community. As set out in the original submission, 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. Activities under the Resource Management Act 1991 can have large implications on their ability to perform these responsibilities.

Firefighting water supply:

Fire and Emergency maintains that an additional hydrant is needed around Lot 61 to provide adequate coverage across the development area. It does not appear that all lots are within 135m of a fire hydrant as required by the NZFS Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Water Supplies Code of Practice) or 75m hose length from a parked appliance. These distances must be calculated in relation to the actual hose drive/run times along roads and rights of ways as opposed to a circumference calculation 'as the crow flies'. The length of the shared access lot (Lot 302) results in several lots appearing to be outside this limit as calculated from the hydrant located outside Lot 84.

Fire and Emergency recognises that there are other hydrants that appear closer by direct line on the site plans. However, these alternative hydrants would require access through other properties and may not be acceptable due to the developments and fencing on these sites. Should Fire and Emergency have to use these alternative hydrants, the additional access constraints/barriers in overcoming fencing and other built developments could add, possibly critical, time delays to responding to a fire. Given this, the preference remains for an additional hydrant so as to maintain all lots having firefighting water supply accessible by road or shared access lot.

We support a subdivision consent as recommended by the development engineer if the understanding of 'firefighting coverage' uses the above approach of calculating distances from fire hydrants and parked appliances by how a hose would be laid down.

Emergency access:

We are concerned that the expectation that Fire and Emergency will be able to access all areas of the development as necessary for emergency purposes (as raised by the s42a reporting officer) is compromised by the current design of the shared access lot. The distance from the road of the lots accessed through Lot 302 means Fire and Emergency prefer to be able to bring fire appliances closer to the site of a fire. Particularly given the above recommendation for a hydrant along this access lot, there should be accompanying provision for sufficient width and hardstand area for fire appliances nearby which the 3.5m width design does not provide for. The current lack of access and subsequent possible emergency response delays can heighten the risk to people, property and the environment should a fire occur.

Fire and Emergency appreciate the opportunity to table these matters for the Hearing Commissioners' consideration.

Yours sincerely



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on behalf of

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