

Waikato District Council  
Ngaruawahia office  
15 Galileo Street  
Ngaruawahia 3742

12 February 2021

**Attention: Hearing Commissioners**

Dear Commissioners

**Fire and Emergency New Zealand – Letter to be tabled at Hearing 17: Te Kowhai Airpark**

Fire and Emergency New Zealand (Fire and Emergency) has lodged a submission on the Proposed Waikato District Plan (submitter 378) and further submissions (submitter FS1114). Fire and Emergency has opted not to attend Hearing 17 – Te Kowhai Airpark scheduled to commence Monday 8<sup>th</sup> March 2021 and requests that in lieu of attendance this letter be tabled for the Hearing Commissioners' consideration.

The Officer's report for Hearing 17 – Te Kowhai Airpark of the Proposed Waikato District Plan (PWDP) have been received. Fire and Emergency's response to the Officer's report recommendations on these submission points are set out below.

Rule 27.2.6 Noise – Other than Taxiways

Fire and Emergency have sought to retain Rule 27.2.6 P3 relating to noise from emergency sirens. As there are no submissions seeking to change or delete Rule 27.2.6 P3, the Reporting Officer has recommended that the Panel accept Fire and Emergency's submission. This is supported by Fire and Emergency.

Policy 9.2.1.2 – Servicing

Fire and Emergency have sought that water supply for firefighting purposes be specified in Policy 9.2.1.2(a). The notified policy does not specifically mention water supplies for firefighting.

The Reporting Officer notes that the Te Kowhai Airpark does not have ready access to an existing Council reticulated water supply or community reticulated water supply, as there are none located in close proximity. Further, the Reporting Officer has considered the information provided in the statement of evidence of Craig Sharman on behalf of Fire and Emergency New Zealand submitted as evidence as part of Hearing 10 – Residential Zone. This outlines the purpose of Fire and Emergency seeking provision for water supply for firefighting purposes in the district's zones. This includes efficient and effective response to fire, and ability for fire suppression/extinguishing of fires through water supply, which can minimise risk of harm to people and damage to development.

The Te Kowhai Airpark Zone contains four precincts, with some small minimum lot sizes provided for (including 450m<sup>2</sup> and 800m<sup>2</sup>). Smaller lots generally do not have the size and minimum development setbacks to significantly reduce the potential of fire escaping across boundaries and affecting development on neighbouring lots. The Reporting Officer therefore considers that ensuring that small lots have ready access to water supply sufficient for firefighting purposes is therefore appropriate.

In addition, in relation to larger lots, the Reporting Officer considers that, given the comprehensive nature of the Te Kowhai Airpark Zone and that larger lots may be interspersed with smaller lots within Precincts B, C and D, then ensuring the adequacy of the water supply for firefighting purposes for larger lots may also be an appropriate matter to consider at the time of a subdivision proposal.

The Reporting Officer considers that including the words “including for firefighting purposes” in Policy 9.2.1.2(a) is appropriate as it makes it clear that servicing capacity includes firefighting as a relevant matter and as follows:

*9.2.1.2 Policy - Servicing*

*(a) Development is to be adequately serviced with respect to essential services, water supply (including for firefighting purposes), wastewater treatment and disposal and stormwater treatment and disposal.*

The Reporting Officer has therefore recommended that the Panel accept the submission by Fire and Emergency. This is supported by Fire and Emergency.

Rule 27.4.2 Subdivision - Subdivision Allotment size

Subdivision allotment size Rules 27.4.2 RD1, RD2 and D1 prescribe requirements relating to allotment size which are to be applied to subdivision activities in Precincts B, C and D.

Fire and Emergency have sought that Rule 27.4.2 Subdivision Allotment Size be amended to require lots in Precincts B, C and D be connected to a public-reticulated supply or water supply sufficient for firefighting purposes, with an associated matter of discretion as the notified Subdivision Rules 27.4.2 RD1 and RD2 do not mention water supply for firefighting purposes. NZTE Operations Limited [FS1339.172] supports this, on the basis that water supply for firefighting purposes is appropriate at an airpark.

Amendments sought to RD1 Standard 27.4.2 are as follows:

*(a) Subdivision within PRECINCT B.*

*(b) Council's discretion is restricted to the following matters:*

*x. Proposed lots must be connected to public reticulated water supply or water supply sufficient for firefighting purposes.*

Amendments sought to RD2 Standard 27.4.2 are as follows:

*(a) Subdivision within PRECINCT C AND D where:*

*x. Proposed lots must be connected to public reticulated water supply or water supply sufficient for firefighting purposes.*

*Council's discretion is restricted to the following matters:*

*x. Provision of infrastructure, including water supply for firefighting purposes.*

The Reporting Officer has recommended that subdivision Rules 27.4.2 RD1 and RD2 be amended so that all lots within the Te Kowhai Airpark Zone require a connection to a private reticulated water supply network sufficient for firefighting purposes. The Reporting Officer considers that the addition of the words: “that must be sufficient for firefighting purposes” makes it clear that the private reticulated water supply network must also provide water supplies for firefighting purposes. Further, the requirement to be “connected to a public-reticulated water supply” would ensure that the Te Kowhai Airpark Zone manages its own servicing needs

and that activities are able to connect to a private Te Kowhai Airpark reticulated water supply network sufficient for firefighting purposes.

The Reporting Officer notes that this is to be consistent with the recommendations from the s42A report authors for the Residential Zone (page 263, paragraph 690) for Rule 16.4.2 RD1(b)(x) and (page 266, paragraph 695) for Rule 16.4.3 RD1(b)(x).

The Reporting Officer has therefore recommended that the Panel accept in part the submission by Fire and Emergency to the extent that proposed lots must be connected to a private reticulated water supply sufficient for firefighting purposes as conditions of restricted discretionary activity Rules 27.4.2 RD1 and RD2, and a matter of discretion be included in those rules for provision of infrastructure, including water supply for firefighting purposes. This is supported by Fire and Emergency.

Should you have any queries or seek clarification on the above, please contact me on the details below.

Yours sincerely



**Alec Duncan**

Planner

on behalf of

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