

## Form 5

### **Submission on Proposed Private Plan Change 3: Farmers Corner Rezoning, Ashburton District Council**

To: Ashburton District Council

Submission on: Private Plan Change 3 – Farmers Corner

**Name of submitter:** Fire and Emergency New Zealand (FENZ)

Address: c/o Beca Ltd  
PO Box 3942  
Wellington 6140

Attention: Alicia Todd

Phone: 04 896 0652

Email: Alicia.todd@beca.com

This is a submission on behalf of Fire and Emergency New Zealand (FENZ) on the Proposed Private Plan Change 3 of the Ashburton District Plan (hereafter “PPC3”) as requested by Farmers Corner Development Limited and notified by Ashburton 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. PPC3 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 within this Plan Change area.

## **1.1 Adequate water supply and access for firefighting activities:**

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.

Adequate access to both the source of a fire and a firefighting water supply is also essential to the efficient operation of FENZ. The requirements for firefighting access are set out in the Code of Practice and further detailed in FENZ's 'Emergency Vehicle Access Guidelines' (May 2015).

A fire appliance requires, as a minimum, access which is four metres in width and four metres in height clearance, with a maximum gradient of 1 in 5 (and accompanying transition ramps).

## **1.2 Proposed PPC18 additions relevant to FENZ:**

PPC3 seeks to rezone 21.05 hectares of land on the corner of State Highway 1 (SH1) and Long Beach Road from a 'Rural B' zoned area to a 'Rural Tourism' zoning. PPC3 also seeks to insert a new chapter to the Ashburton District Council (ADC) District Plan, being provisions for the 'Rural Tourism' zone, which relates specifically to the Plan Change area.

Should ADC make PPC3 operative, the Plan Change area will be subject to the new objectives, policies and rules proposed for the 'Rural Tourism' zone, alongside underlying district-wide plan provisions.

### **1.2.1 Water Supply**

Regarding onsite water supply provisions, PPC3 states that the Plan Change area will be serviced by an existing onsite well, which is currently consented to draw groundwater under resource consent CDC183036. The rate of water extraction that this consent allows for is a flow rate of 13.6L/sec and a total volume of 213.3m<sup>3</sup> per day. This consent only allows for water to be abstracted for use by irrigation. The application notes that the existing groundwater consent will need to be varied to allow for water to be used for landscaping irrigation, potable supply, and at visitor accommodation.

The services assessment makes no reference to onsite water supply for firefighting purposes. However, standards in the operative Ashburton District Plan (Subdivision) require that all new allotments provide a suitable water supply for firefighting purposes, that either demonstrates compliance with the Code of Practice 4509:2008 or receives approval from FENZ.

No standards relating to firefighting water supply are proposed in the new Rural Tourism Zone chapter, nor are there any in the existing Rural Zone chapter. This means that should visitor or residential accommodation be established in the plan change area, without going through a process of subdivision, there will be no requirements in place to provide a water supply suitable for firefighting purposes.

FENZ seeks greater certainty as to the water available within the Plan Change area for firefighting supply, in the form of compliance with the Code of Practice. FENZ notes that the Code of Practice allows for alternative water supply and access arrangements to be made onsite provided these are approved by the relevant FENZ area manager.

### 1.2.2 Access for Firefighting Appliances

PPC3 states that the Plan Change area will be accessed via Long Beach Road. The plan change proposes several accommodations, 'glamping' and 'silo camping' units, to be nestled in amongst native trees onsite. The proposal suggests three alternate site layout options in Appendix 4, each with a unique internal roading layout and walking tracks. In all three layout concept plans, many of these units will not be accessible by firefighting appliances. Concept layout 3 is considered by FENZ to facilitate greatest accessibility for firefighters in the event of an emergency.

No information is provided in the application as to the proposed width of internal roads. Many roads in the proposed internal roading network are also surrounding by large native trees which may obstruct the required 4.0 metre vertical and horizontal clearance required by firefighting appliances.

FENZ seek certainty that firefighting appliances and firefighters will have access to all habitable structures within this area.

### 1.2.3 Emergency Escape Routes

For any habitable structure, FENZ recommends that there are viable 'escape routes' to use in the event of an emergency. The concept plan arrangements proposed within the Plan Change application propose several accommodation arrangements with a single access route. This poses a risk to people in the event of a fire.

For example, in Concept Plan 1 submitted with the plan change application, should a fire ignite within the proposed 'central hub', people would be required to move towards the fire source in order to escape. FENZ suggests consideration is given to alternate access routes to use in the event of an emergency, such as those shown as red arrows in **Figure 1-1** below.



**Figure 1-1:** Recommended emergency escape paths

#### 1.2.4 Onsite Indigenous Vegetation

PPC3 seeks to enhance onsite biodiversity within the Plan Change area. This is to be done by planting a substantial number of native plant species to enhance the visual amenity and biodiversity values onsite. Appendix 3A-2 of PPC3 contains a '*Plant Species List*', of which 75% of all onsite plantings are to be selected from in accordance with zone standard 3A.10.2.

To reduce risk to people, property and the surrounding environment, FENZ seeks that Appendix 3A-2 be amended to remove all highly flammable plant species from the list. Highly flammable plant species typically exhibit the following characteristics:

- Contain fine, dry, or dead material within the plant, such as twigs, needles and leaves
- Leaves, twigs and stems contain volatile waxes or oils
- Aromatic leaves
- Sap is gummy and has a strong odour
- Loose or papery bark

Examples of highly flammable indigenous plant species that are included in Appendix 3A-2 are:

- *Kunzea ericoides* – Kānuka
- *Leptospermum scoparium* – Mānuka
- *Podocarpus totara* – Tōtara and kahikatea
- *Cyathea & dicksonia* – Includes several species of tree fern
- *Cyathodes fasciculata* – Tall mingimingi
- *Cordyline australis* – Cabbage tree
- *Dacrydium cupressinum* – Rimu
- *Phormium* - Harakeke

In place of these more flammable species, it is recommended that Appendix 3A-2 be amended to focus on low flammability plant species. These plants tend to exhibit the following characteristics:

- Moist, supple leaves
- Little dead wood and dry, dead material doesn't accumulate in the plant
- Watery sap that doesn't have a strong odour
- Low levels of sap or resin

Examples of low flammability indigenous species include:

- *Fuchsia excorticata* - New Zealand fuchsia and kotukutuku
- *Pseudopanax crassifolius* – Horoeka or lancewood
- *Pseudopanax arboreus* – Five finger, puahou or whauwhaupaku
- *Coprosma robusta* – Karamu
- *Coprosma grandifolia* – Kanono or raurēkau
- *Geniostoma ligustrifolium* - Hangehange
- *Coprosma repens* – Tree bedstraw, taupata, mirror bush, looking-glass bush
- *Carpodetus serratus* – Putaputawētā, marbleleaf and bucket-of-water-tree
- *Corynocarpus laevigatus* – Karaka
- *Griselinia littoralis* – Kapuka, New Zealand broadlead
- *Griselinia lucida* - Akapuka or shining broadleaf
- *Macropiper excelsum* – Pepper tree and kawakawa

- *Solanum aviculare* - New Zealand nightshade and poroporo.

Ashburton tends to exhibit hot, dry conditions in the summer and autumn seasons. Because of this, fire risk needs to be avoided and minimised where possible. These low flammability species do not readily ignite, and as a result, are suitable for use in the Plan Change area. When in the immediate vicinity of structures or hazardous activities such as car parking and cooking facilities, a setback of at least 3-4 metres is recommended to reduce fuel continuity.

### **1.2.5 Setback of Activities Which Present a Fire Risk**

PPC3 proposes locating some onsite car parking beneath vegetation onsite (as in concept arrangement 1) and locating a BBQ area directly adjacent to vegetation (all concept options). FENZ recommends that any activity that has the potential to cause a fire should be appropriately separated from flammable plant species, and ideally from all vegetation onsite. FENZ considers an appropriate setback to be approximately 3 – 4 metres.

FENZ would be happy to meet with the Applicant to discuss the proposed site layout in further detail.

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

FENZ is neutral towards PPC3. Should ADC approve the plan change, FENZ seeks the following amendments:

- That a policy be added in relation to indigenous biodiversity in the Plan Change area, which reads:

Policy 3A.2X: To avoid planting indigenous plant species that are identified as being highly flammable.

- That an additional zone standard be added to the proposed 'Rural Tourism' zone chapter 3A.10, which reads:

#### 3A.10.X: Fire Risk Management

- a) All habitable buildings and visitor accommodation shall be serviced with a water supply and access that complies with the *New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008*.
  - b) All habitable buildings and visitor accommodation shall be set back at least 3.0 metres from any plantings, unless otherwise agreed with Fire and Emergency New Zealand.
- That Appendix 3A-2 ('*Plant Species List*') be amended to remove species identified as being highly flammable and posing a fire risk, as identified in this submission above

**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)

25/02/2020

.....  
Date

Title and address for service of  
person making submission:

Fire and Emergency New Zealand  
c/o Beca Ltd

Attention: Alicia Todd

Address: Beca Ltd  
PO Box 3942  
Wellington 6140