

Form 13

Submission on a Notified Resource Consent Application - Brougham Street Development

To: New Plymouth District Council

Submission on: Resource consent application LUC20/47704

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 a resource consent application by K.D. Holdings Ltd, concerning the development of a six-level multi-storey building at 45, 49 and 51 Brougham Street and 33 Devon Street West, New Plymouth.

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.

FENZ's submission is:

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 development and activities 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. The proposed development will establish a six-level multi-storey building with a basement car park, in central New Plymouth. The building is proposed to accommodate commercial tenants on levels one to five and a residential apartment on the sixth level. 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.

In regard to water supply, although the site is located in a central, reticulated area, the provision of firefighting water supply is not discussed in the application. The application notes that a reticulated water main is located along Brougham Street, Powderham Street and Devon Street and that Lot 2 DP 15492 has connections, but 45-51 Brougham Street is not currently connected. The application does not provide confirmation that water supply will be sufficient for firefighting purposes. FENZ notes that if the building is to be connected to the reticulated water main, it will need to test the mains' pressure in the area to determine whether the firefighting water supply will be adequate.

Further information around firefighting water supply has been requested from New Plymouth District Council and the Applicant but, to date, no response from the applicant has been received. Therefore, there remains a risk to FENZ that water supply will not be sufficient to carry out firefighting duties in the case of an emergency.

To ensure water supply is sufficient for firefighting purposes, FENZ requests the inclusion of a condition requiring the building to be connected to a water supply system that complies with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice). FENZ would welcome the opportunity to provide advice to the applicant as to how best to minimise the risk of fire at the proposed development area.

FENZ seeks the following decision from the consent authority:

FENZ is neutral towards the application as it is currently proposed. Should the consenting authority grant resource consent, FENZ seeks that it includes as a condition of consent:

- a. *Prior to occupation, the building shall be connected to a water supply system that complies with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.*

FENZ is not a trade competitor of the applicant.

FENZ wishes to be heard in support of their submission.



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(Signature of person authorised to sign on behalf of Fire and Emergency New Zealand)

08/10/2020

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Date

Title and address for service of
person making submission:

Fire and Emergency New Zealand
c/o Beca Ltd

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