

From: [Alex Strawbridge](#)
To: [Mailroom Mailbox](#)
Subject: Proposed Canterbury Air Regional Plan - NZFS Comission submission
Date: Friday, 1 May 2015 4:10:06 p.m.
Attachments: [Proposed Air Plan - NZFS Commission submission.pdf](#)

Hello,

Please find attached a submission made on behalf of the NZ Fire Service Commission on the Proposed Canterbury Air Regional Plan.

If I could please have confirmation when this email has been received that would be appreciated.

Kind regards,

Alexandra Strawbridge

Planner

Beca

Phone +64 4 473 7551 Fax +64 4 473 7911

DDI +64 4 550 5995

www.beca.com

www.Linkedin.com/company/beca

NZ Workplace Health & Safety Supreme Award 2014 // Best overall contribution to improving workplace H&S

CIBSE Building Performance Awards 2015 // International Project of the Year - Christchurch International Airport Artesian Heating & Cooling System



NOTICE: This email, if it relates to a specific contract, is sent on behalf of the Beca company which entered into the contract. Please contact the sender if you are unsure of the contracting Beca company or visit our web page <http://www.beca.com> for further information on the Beca Group. If this email relates to a specific contract, by responding you agree that, regardless of its terms, this email and the response by you will be a valid communication for the purposes of that contract, and may bind the parties accordingly.

This e-mail together with any attachments is confidential, may be subject to legal privilege and may contain proprietary information, including information protected by copyright. If you are not the intended recipient, please do not copy, use or disclose this e-mail; please notify us immediately by return e-mail and then delete this e-mail.

FORM 5

SUBMISSION ON A PUBLICALLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION UNDER CLAUSE 6 OF THE FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

To: Canterbury Regional Council

Submission on: Proposed Canterbury Air Regional Plan ('the Proposed Plan')

Name of submitter: **New Zealand Fire Service Commission ('the NZFS Commission')**

Address for service: C/- Beca Ltd
PO Box 3942
WELLINGTON 6140

Attention: Alexandra Strawbridge

Phone: 04 550 5995

Email: alexandra.strawbridge@beca.com

The specific parts of the Proposed Plan that the NZFS Commission's submission relates to are:

The NZFS Commission has an interest in the outdoor burning provisions of the Proposed Plan. Specifically, the NZFS Commission is concerned with how the provisions of the Proposed Plan govern 'live fire training'; a practice which involves setting fire to an existing structure in a controlled setting for the purposes of training NZFS personnel.

The reasons for the NZFS Commission's submission are:

NZFS personnel work in dangerous environments where their safety and the success of their actions is determined by training, PPE (Personal Protective Equipment) and the most appropriate selection of fire suppression tools and medium application.

While 'cold' training provides education on the procedures to be followed, there is no other form of training that gives students the experience they will require in real life scenarios than live fire training. Live fire training is an extremely beneficial training medium as it allows operational firefighters to study fire development and behaviour and to practice various suppression techniques and tactics in a controlled and safe environment.

Modern construction methods and materials have changed the way that fires react and therefore the conditions that firefighters are faced when attending a fire emergency. Live fire training allows

the NZFS to replicate some of these conditions; in particular the unvented fire and partially vented fire conditions that are encountered with modern construction.

In addition, NZFS policy requires that all fire incidents attended by the NZFS be investigated to establish the cause of the fire. In certain incidents, a specialist investigation is required to be undertaken by officers with the appropriate qualifications, training and experience to be considered as Specialist Fire Investigators. On occasion, these Specialist Fire Investigators may be called to provide expert opinion of investigations carried out to Criminal, Coronial and Civil courts of law. Therefore, the ability to carry out or observe demonstrations, reconstructions, and experiments involving live fire burning is a vital component in the development and upkeep of expertise and credibility for Specialist Fire Investigators.

In relation to Canterbury, the NZFS Commission operates a training centre at Woolston in Christchurch. This centre supplies training for Regions 4 and 5 of the NZFS (which covers the entire South Island). It also provides training for staff from other organisations, including: the Police; the Department of Conservation; the Ministry of Business, Innovation and Employment; Christchurch City Council; rural fire authorities; fire engineering representatives; insurance companies and the University of Canterbury.

As part of training, live burns are carried out at this training centre. These live burns are enabled under a resource consent (CRC961956). This training centre is expected to be relocated in the near future and is likely to remain within an urban location. However, at times live burns are also required to be carried out at the site of the property to be burned. These locations may be within an urban or a rural setting, depending on where a property becomes available for this purpose. For this reason, the NZFS requires the ability to carry out live burns in both urban and rural locations.

NZFS training staff are acutely aware of air quality issues (in Christchurch especially) and undertake live burning exercises with absolute regard to keeping contaminant release to the minimum for the briefest period of time possible.

The ability to conduct live fire training also aids in ensuring that NZFS personnel are better equipped to deal with actual fire emergencies with the aim of extinguishing these fires in a more efficient and expeditious manner. The NZFS Commission believes that this ability results in a net overall reduction of fire-borne contaminants throughout the South Island.

The NZFS Commission's submission is:

- The NZFS Commission **supports** Rule 7.6 of the Proposed Plan:

7 Rules - Outdoor burning – Anywhere in the Region – 7.6:

The discharge of contaminants into air anywhere in the Region from outdoor burning of buildings or other materials for the purpose of fire-fighting training or research is a permitted activity provided the following conditions are met:

1. *The fire is under the control of the Rural Fire Authority, New Zealand Fire Service, Department of Conservation, New Zealand Defence Force, Christchurch International Airport Rescue Service or other nationally recognised body authorised to undertake fire-fighting training or research activities; and*
2. *All properties within a 150m radius of the point of discharge are notified in writing at least 7 days prior to the training exercise; and*
3. *Within a Clean Air Zone, building fires do not occur during the months of April, May, June, July, August and September.*

The NZFS Commission considers that this rule adequately provides for essential live fire training and research activities, while setting appropriate controls to manage actual and potential environmental effects (in both urban and rural settings).

- The NZFS Commission **opposes in part** Rule 7.4 of the Proposed Plan and seeks the following amendment:

7 Rules – All activities – 7.4:

*Except where undertaken within the property of an industrial or trade premise and specifically authorised by resource consent granted pursuant to rule 7.31, **or as otherwise allowed under rule 7.6,** the discharge of contaminants into air from the burning of any of the following materials is a prohibited activity:*

1. *Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and*
2. *Wood which is painted, stained or oiled; and*
3. *Metals and materials containing metals, other than as provided for by Regulation 9 of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004; and*
4. *Materials containing asbestos; and*
5. *All rubber; and*
6. *All plastic; and*
7. *Medical waste, pathological wastes, quarantine waste, and animal waste, other than in a high temperature incinerator identified in Regulation 12 of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004; and*
8. *Synthetic material, including but not limited to, motor vehicle parts, foams, fiberglass, batteries, chemicals, paint and other surface coating materials; and*
9. *Tar or bitumen; and*
10. *Used and waste oil, excluding re-refined oil; and*
11. *Sludge from industrial processes; and*
12. *Any container that has been used for the purpose of storing hazardous substances; and*

13. *Any materials within a landfill or waste transfer station or waste recovery area, but excluding gas emissions; and*
14. *Any fuel with a sulphur content of greater than 1% by weight.*

It is not clear from the proposed wording of Rule 7.4 and 7.1 whether live burns for firefighting training are exempt from the prohibited activities listed in Rule 7.4. Many of the materials listed in Rule 7.4 may be found in a typical building. The burning of a complete building is necessary during a live burn in order to ensure that fire training and research is as realistic as possible. While Rule 7.6 states that the burning of buildings or other materials for the purpose of firefighting training or research is a permitted activity, Rule 7.1 states that:

Rule 7.1 – *“Any activity must comply with all applicable rules of Section 7 of this Plan, except where explicitly stated to the contrary in any other applicable rule in this Plan. Where two rules are applicable to the same activity, the more stringent activity status applies.”*

As it is not explicitly stated that live burns for firefighting training and research is exempt from Rule 7.4, and as the activity status in Rule 7.4 is more stringent than that in Rule 7.6, Rule 7.4 as proposed appears to apply to live burns. Rule AQL36 of the operative Canterbury Natural Resources Regional Plan clearly exempts live burns for firefighting training and research from the prohibitions on materials to be burned. The NZFS Commission would appreciate the continuation of this exemption into the Proposed Plan in the interests of enabling realistic firefighting training and research.

- The NZFS Commission **supports** Policy 6.18 of the Proposed Plan:

6 Policies – Outdoor burning – 6.18:

Avoid the outdoor burning of material, in urban areas, except for the purpose of fire fighting research and training, community events and cooking.

The inclusion of Policy 6.18 provides a clear position on outdoor burning for fire fighting training and research within urban areas.

- The NZFS Commission **opposes in part** Policy 6.16 and seeks the following amendment:

6 Policies – Outdoor burning – 6.16:

*Avoid the outdoor burning of non-organic material in rural areas, **except for the purpose of fire fighting research and training.***

Policy 6.16 as proposed provides a clear policy of avoidance of outdoor burning of non-organic material in rural areas, with no exceptions. This position conflicts with the intent of Rule 7.6, which allows for the outdoor burning of buildings or other materials in all areas. The inclusion of

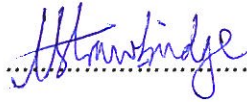
the amendment requested above will remove this inconsistency and make it clear that the burning of material in any area for the purpose of fire fighting research and training is an acceptable activity.

The NZFS Commission seeks the following decision from the local authority:

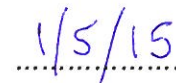
That, if the Proposed Plan is approved, the above retentions and/or amendments as requested by the NZFS Commission be included in the final wording.

The NZFS Commission could not gain an advantage in trade competition through this submission.

The NZFS Commission wishes to be heard in support of its submission.

.....

**(Signature of person authorised to sign
on behalf of New Zealand Fire Service
Commission)**

.....

Date

