

## COMMENTS ON THE LAND USE RECOVERY PLAN REVIEW

To: Environment Canterbury  
Comments on: Land Use Recovery Plan Review  
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*(Signature of person authorised to sign on behalf of New Zealand Fire Service Commission)*

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The New Zealand Fire Service Commission (the NZFS Commission) is the governing body that controls the New Zealand Fire Service (NZFS) and the National Rural Fire Authority (NRFA). The Fire Service Act 1975 and the Forest and Rural Fires Act 1977 establish the governance, management and operational arrangements for these organisations. It is a matter of prime importance for the NZFS Commission to take an active and co-ordinating role in the promotion of fire safety in New Zealand, through reducing the incidence of fire and the attendant risk to life and property; and through seeking unity and completeness of fire safety law and practice (as set out in the Fire Service Act 1975, section 20).

The NZFS Commission provides the following comments on the Land Use Recovery Plan (LURP) Review in the context of its responsibilities as set out above.

### **Topic Area: Direction and Coordination**

With regards to the LURP, the NZFS Commission is most interested in how both greenfields and infill development is adequately serviced in terms of water supply for firefighting and provision of access for fire appliances to a property. The NZFS is required to efficiently and effectively respond to fire and other emergencies. In order to achieve this, it requires access to a water supply which can provide the volumes and pressure necessary to sufficiently address a fire. The most reliable form of firefighting water supply is provided via a fully reticulated water supply system. However, where this is not available there are alternative ways of supplying firefighting water that are still capable of meeting the

operational requirements of the NZFS. The design requirements for both water supply and access to this supply are contained within the New Zealand Standard *New Zealand Fire Service Firefighting Water Supplies Code of Practice* NZS PAS 4509:2008.

The NZFS Commission therefore appreciates the focus of the LURP on provision of infrastructure in an integrated manner. Specifically, the following provisions of the LURP are supported by the NZFS Commission:

- The direction given in Section 4.4.1 of the LURP to *“Integrate Land Use and Infrastructure”*.
- LURP Actions 33, 34 and 35 directing the City and District Councils to provide for prioritised infrastructure programmes to ensure that funding for infrastructure is co-ordinated with the areas identified for development in the near future.
- LURP Action 44 directing the Regional Council to insert ‘Chapter 6’ into the Canterbury Regional Policy Statement to provide for the ‘Recovery and Rebuilding of Greater Christchurch’. Specifically, the provisions of Chapter 6 that direct that infrastructure must be provided prior to new development taking place, as well as the direction for rural residential development to be provided with a suitable water supply.
- Outcome 1: *A clear planning framework directs where and how new development should occur so that it integrates efficiently and effectively with infrastructure programmes and avoids key hazards and constraints.*
- Outcome 2: *Servicing of land for housing and business and its release to the market keep pace with anticipated demand.*

The NZFS Commission notes that the Review Consultation Pamphlet states that Actions 33, 34, 35 and 44 have all been carried out, so that future development is now required to be in line with the Chapter 6 of the Regional Policy Statement and will be managed alongside Long Term Plan funding for prioritised infrastructure provision.

The NZFS Commission considers that this focus on infrastructure provision will go some way in ensuring that the responsibilities of the NZFS Commission (set out in the Fire Service Act 1975) can be met, in the interests of promoting the health and safety of the community. In terms of actions to achieve from here, the NZFS Commission makes the following requests:

1. That the focus on provision of adequate infrastructure continues to be a high priority for the LURP.
2. That firefighting capacity be considered as a vital aspect of the provision of water supply infrastructure, whether as part of the repair and extension of a fully reticulated system to both infill and greenfields urban development, or in addition to a restricted supply to rural residential development.
3. That adequate access for fire appliances to both a firefighting water supply and each structure that poses a fire risk be considered as part of providing infrastructure to meet the health and safety needs of the community.