

BEFORE THE MANAWATU-WANGANUI (HORIZONS) REGIONAL COUNCIL

UNDER THE Resource Management Act 1991

IN THE MATTER OF: The Proposed Manawatu-Wanganui
(Horizons) Regional Council One
Plan

AND: Submission made by the New
Zealand Fire Service Commission

STATEMENT OF EVIDENCE OF CHARLOTTE EMILY CRACK

INTRODUCTION

1. My name is Charlotte Emily Crack. I hold the qualification of Bachelor of Arts in Human Geography and a Master of Regional and Resource Planning from the University of Otago. I have two and a half years professional experience practicing in Resource Management.
2. I hold the position of Planner in the Wellington office of Beca Carter Hollings and Ferner Limited (Beca).
3. Beca has a contract with the New Zealand Fire Service Commission (“the Fire Service”) whereby we monitor all notified plans, notified resource consent applications, plan changes, variations, and engineering codes of practice, that might affect the Fire Service’s properties and operations around the country. Where it is considered necessary, we take action on behalf of the Fire Service by lodging submissions and entering into discussions with councils. I am the national coordinator of this contract and am also responsible for monitoring activities in the Arapawa Fire Region, which includes the lower part of the North Island and the upper part of the South Island. I have been actively involved with this contract for the entire time that I have been employed at Beca.

4. I am familiar with both the Proposed Manawatu-Wanganui (Horizons) One Plan (“the Proposed One Plan”) and the submission that the Fire Service made on the Proposed Plan. I have reviewed the recommendations made within the Council’s Section 42A reports, however I note that none of them relate to the Fire Service’s submission.
5. I am accompanied today by Mr Kerry Stewart, Risk Management Coordinator for the Western Fire Region, and Mr Mitchell Brown, Assistant Fire Region Commander. Mr Stewart will give evidence in support of the Fire Service submission, and Mr Mitchell Brown is available for questions from the Committee.

SUBMISSION

6. Beca undertook a review of the Proposed One Plan on behalf of the Fire Service. This review identified two particular areas of concern to the Fire Service relating to their obligations under the Fire Service Act 1975. These two areas include:
 - a. Aspects of the Proposed One Plan that may impact upon Fire Service activities in relation to fire-fighting and emergency management operations.
 - b. Aspects of the Proposed One Plan that may impact on the operations of the Fire Service, including air quality restrictions, access for fire fighting appliances and the provision of sufficient water supply for fire fighting purposes.
7. Given these concerns, the Fire Service made a submission on the Proposed One Plan on the 30th of August 2007.
8. My statement of evidence will outline the key points of the Fire Service submission, which relates to various chapters within the Proposed One Plan. Where relevant I will also discuss any Resource Management Act (1991) matters. Mr Stewart will provide technical evidence.

ENTIRE ONE PLAN

9. The Fire Service wishes to support the proposed format of the One Plan.

CHAPTER 6: WATER

10. The Fire Service wishes to amend Policy 6-8(b)(iv) (Point source discharges to water), and seek the specific inclusion of 'fire fighting and hazardous substance emergency management' as an 'other exceptional circumstance' within this Policy. The inclusion of additional wording to specify 'fire fighting' makes it clear that this is an "exceptional circumstance". Mr Stewart will describe this in further detail, in his supporting statement.
11. The Fire Service wishes to support Policy 6-19(a) (Apportioning, restricting and suspending takes in times of low flow) and seek to retain the policy that permits water takes for fire fighting purposes regardless of river flow. Fires need to be attended from the nearest adequate source of water available, to extinguish hazards and reduce risks to people and property. This particularly applies to rural areas, where rivers are commonly the only adequate water source available to the Fire Service.

CHAPTER 8: AIR

12. The Fire Service wishes to amend Policy 8-3 (Regulation of Discharges to Air), and seek the inclusion of a policy that provides for the discharge to air, if the discharge is a fire fighting or a fire training activity. Such a discharge to air is an action that the Fire Service frequently carries out in both training and fire fighting activities, and the policies should clearly specify that the discharge is allowed if carried out by the Fire Service.

CHAPTER 14: DISCHARGES TO AIR

13. The Fire Service wishes to amend Rule 14-5(b) (Open Burning) and seeks an amendment to allow fire training to include the burning of an existing building where it has been constructed using halogenated materials. The Fire Service receives frequent requests to burn buildings (including houses), as they can undertake this activity in a safe, controlled and monitored environment. These burns also provide the Fire Service with realistic live training opportunities, accurately simulating conditions that are likely to be experienced by fire officers at a fire. Additional costs would be involved if this activity required the prior removal of non-halogenated materials before burning. This amendment is to allow burning to occur without adding unnecessary costs to this training activity.
14. The Fire Service wishes to support Rule 14-5(c) (Open Burning). The improvement of air quality in urban areas is supported when these areas are clearly identified, so that the public can be educated on the regional plan rules that apply to their property. Enforcement practices and processes for offending persons need to be clearly identified. Mr Stewart will describe this in further detail in his supporting statement.
15. The Fire Service wishes to support Rule 14-6(d)(i) (Burning activities regulated by RM Regulations 2004) where the burning of oil is permitted for fire training purposes. The Fire Service uses oil based burning for training, as this is an accelerant found in fires. Training with this substance will enable the Fire Service's fire fighters to be more efficient and effective in their role in the community.
16. The Fire Service wishes to amend Rule 14-8 (Other burning activities), and seek the inclusion of a provision that allows for fire training activities, undertaken in accordance with an approved policy manual and management plan. An agreement between the Fire Service and the Regional Council on an acceptable procedure and practice for fire fighting in the community will enable the Fire Service's fire fighters to be more efficient and effective in their role.

CHAPTER 15: TAKES, USES, AND DIVERSIONS OF WATER AND BORES

17. The Fire Service wish to support Policy 15-5 (Consent review and expiry), and Rule 15-7 (Takes from rivers protected by water conservation orders), which allow taking and use of water for fire fighting purposes. These policies support the role of the Fire Service in the community.

CHAPTER 16: BEDS OF RIVERS AND LAKES

18. The Fire Service wishes to amend Rule 16-12 (Other structures including bridges, fords and other access structures), and seek an amendment that provides for the construction of structures that provide for fire fighting access to fire hazards, and access to water supply for fire fighting. The ability to have access to water for fire fighting and access to fire hazards is paramount for effectively reducing risk to the community.

CHAPTER 17: ACTIVITIES IN COASTAL MARINE AREAS

19. The Fire Service wishes to amend Rule 17-29 (Discharges into water from ships, boats, fire fighting and oil spills). The Fire Service supports the rule allowing for discharges to be permitted into water for fire fighting purposes, but seek an amendment to include fire fighting training purposes, with appropriate conditions. There is a need to undertake training so that if a fire event occurs within the Coastal Marine Area (CMA), Fire Service staff are adequately prepared for attending the fire hazard.

SUMMARY

20. Two particular areas of concern to the Fire Service were identified in regards to the Proposed One Plan, which included:

- a. Aspects of the Proposed One Plan that may impact upon Fire Service activities in relation to fire-fighting and emergency management operations.
 - b. Aspects of the Proposed One Plan that may impact on the operations of the Fire Service, including air quality restrictions, access for fire fighting appliances and the provision of sufficient water supply for fire fighting purposes.
21. The Proposed One Plan should take into account the operational requirements of the Fire Service to adequately enable fire-fighting activities within the region to be undertaken in a safe, effective and efficient manner. It is therefore important to the Fire Service that the provisions of the Proposed One Plan recognise the importance of essential services, such as emergency services, to the safety and well-being of the community. This means ensuring that appropriate fire fighting water supplies are made available, and that adequate access is provided to enable emergency services to access water supply and fire hazards.
22. The Fire Service considers that the issues addressed within its submission are environmental effects pertaining to the Resource Management Act 1991 (RMA). The purpose of the RMA is to promote the sustainable management of natural and physical resources, where sustainable management means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. The provision and access of adequate water supply (especially in a rural area) are deemed to be important in terms of achieving the purpose of the RMA.

Mr Stewart will now give evidence in support of the Fire Service submission, and Mr Mitchell Brown is available for questions from the Committee

Charlotte Crack

27 June 2008

