

Greater Wellington Regional Council
PO Box 11646
WELLINGTON 6142

16 May 2017

Attention: Erin Campbell (Hearings Officer)

Dear Erin,

New Zealand Fire Service Commission, Wellington Rural Fire Authority and Wairarapa Rural Fire Authority (Submitter #142) – Letter to be tabled for hearing: Greater Wellington Proposed Natural Resources Plan (Hearing 1)

The New Zealand Fire Service Commission, Wellington Rural Fire Authority and Wairarapa Rural Fire Authority ('Submitter #142') no longer wishes to attend the hearing commencing on 22 May 2017, regarding the topics to be covered under Hearing 1. The reasons for that are set out in this letter, and we therefore request that this letter be tabled for the Hearing Panel's consideration in lieu of attendance.

The Council Section 42A Report is correct in its summary of Submitter #142's submission point S142/003, as set out on page 128 of Appendix C to the Report.

Submitter #142 requested that an addition be made to Policy P7 to recognise that water takes for the purposes of firefighter training (in addition to firefighting for emergency purposes) are also a beneficial use of water. It is noted that the Section 42A Report has recommended that this submission point be rejected. No explanation was provided with this recommendation; however upon further discussion with the author of the Section 42A Report it was ascertained that the author had not considered the water take aspect of firefighter training.

As discussed further in Submitter #142's submission, firefighter training requires equipment training and minor water takes in water bodies, in order to enable firefighters to be equipped to respond effectively during an emergency situation. The inclusion of this aspect of Submitter #142's activities in Policy P7 would provide a clear direction that training as well as emergency water takes are an equally beneficial use of water.

It is noted that, on 11 May 2017, the Fire and Emergency New Zealand Act 2016 ('FENZ Act') received Royal Assent. Schedule 2 of this Act sets out the consequential amendments that have also been passed as part of this Act. An amendment has consequentially been made to section 14(3)(e) of the Resource Management Act, which now will state:

A person is not prohibited by subsection (2) from taking, using, damming, or diverting any water, heat, or energy if –

...

*(e) the water is required to be taken or used for ~~firefighting purposes~~ **emergency or training purposes in accordance with section 45 of the Fire and Emergency New Zealand Act 2016.***

This amendment now clarifies that both emergency and training water takes are an important use of water for the purposes of both preparing for and responding to fire hazards. As set out in the FENZ Act, this amendment will come into force on 1 July 2017.

The implications of this amendment will be discussed further by Submitter #142 within future relevant hearings on the Proposed Natural Resources Plan.

For the purposes of submission point S142/003, Submitter #142 requests that a slight amendment be made to its original request in order to be more in line with the wording of the amendment to section 14(3)(e) of the RMA as set out above:

Policy P7: Uses of land and water

The cultural, social and economic benefits of using land and water for:

...

*(i) firefighting (**emergency or training purposes**),*

...

shall be recognised.

Submitter #142 requests that the Hearing Panel take into consideration the points made above when coming to a decision on the approval of the matters being assessed within Hearing 1 on the Greater Wellington Proposed Natural Resources Plan.

Submitter #142 appreciates the opportunity to be involved in the Plan Review process, in the interests of promoting the safety of the community in regards to protection from fire.

Should you have any further queries please contact myself or Kerry Stewart (NZFS Principal Advisor Fire Risk Management – Region 3) on (027) 249 4526 or kerry.stewart@fire.org.nz.

Yours sincerely



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on behalf of

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