

Palmerston North City Council  
Private Bag 11034  
Palmerston North 4442

22 July 2021

## Attention: Hearing Commissioners

Dear Commissioners

### Notice of Requirement for Palmerston North Regional Freight Hub

Fire and Emergency New Zealand (Fire and Emergency) made a submission on the Notice of Requirement (NOR) received by Palmerston North City Council from KiwiRail Holdings Limited (KiwiRail) for a designation to accommodate a new intermodal rail and freight hub, called the Regional Freight Hub.

Fire and Emergency has opted not to attend the hearing scheduled to commence on 12 August 2021 and requests that, in lieu of attendance, this letter be tabled for the Hearing Commissioners' consideration.

#### Fire and Emergency's submission

Fire and Emergency submitted that firefighting water supply and access is provided in accordance with industry standards. Firefighting water supply and access will provide for the health, safety and wellbeing of people and the wider community, and therefore achieves the purpose of the RMA.

The following condition on the designation was proposed by Fire and Emergency:

#### Access to water supply for firefighting purposes

All new buildings within the facility shall be serviced with adequate water supply and access to that supply for firefighting purposes in accordance with the New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008."

#### Officer's Report

The section 42A Officer's Report (Officer's Report) has been received. Of relevance to Fire and Emergency's submission, the following recommendation has been made:

#### "Recommendation

*We recommend that KiwiRail should undertake a safety in design process and document this, prior to detailed design. We recommend that a condition is placed on the designation requiring access to a water supply for firefighting purposes.*

#### Condition Requirements

*132. Include a condition: The Requiring Authority shall undertake and document a safety in design process and record this in the Outline Plan.*

*The Safety in Design process should include the following components:*

- a) risk assessment and development of a Risk Register*
- b) A SiD workshop which meets KiwiRail's Standard 14-STD-003-COM Programme SHE Management*

- c) *A Hazard and Operability Study and analysis of what happens when designs are operated outside of the design intent.*

*133. Include a condition: All new buildings within the Freight Hub shall be serviced with adequate water supply and access to that supply for firefighting purposes in accordance with the New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008."*

KiwiRail's response:

KiwiRail has proposed condition 74 (in Karen Bell's 'Planning evidence') in response to Fire and Emergency's submission and the Officer's report recommendation. Proposed condition 74 reads:

"Water supply

74. All new buildings within the Freight Hub shall be serviced with adequate water supply and access to that supply for firefighting purposes in accordance with the New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008."

Fire and Emergency's response:

Fire and Emergency Fire strongly supports the officer's recommendation to include a condition to ensure that firefighting water supply and access to that supply is adequately provided for. Fire and Emergency also strongly supports KiwiRail's response to include condition 74 on the designation. Fire and Emergency considers that condition 74, as proposed by Ms Bell, would fully address the issues raised in its submission.

Yours sincerely



**Britta Blann**  
Planning Technician

on behalf of

**Beca Limited**

Phone Number: +644601763  
Email: Britta.Blann@beca.com