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Hutt City Council
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20 May 2026

Sent via email to: Saritha.Shetty@huttcity.govt.nz

Attention: Hearing Panel

Dear Hearing Panel,

Fire and Emergency New Zealand – Letter to be tabled for Hutt City Council Proposed District Plan: Hearing Stream #2: Business

On behalf of Fire and Emergency New Zealand (**Fire and Emergency**), I request that this letter is tabled at the hearing for Hutt City Council's Proposed District Plan - Hearing Stream #2: Business. This letter is in lieu of attendance by Fire and Emergency at the 25 May 2026 hearing.

Fire and Emergency sought the following broad forms of relief of relevance to the Hazardous Substances topic:

- Definition of '*Significant Hazardous Facility*' – expansion of the definition to capture a number of hazardous facilities in the district which have the potential to generate an event which could cause harm to people and the environment.
- An additional performance standard under permitted activity *Rule HS-R1: Additions or alterations to existing significant hazardous facilities* to ensure that where the volume of hazardous substances on-site is to be increased at an existing facility under criterion (b), the facility has a proportionate increase in spill containment volume and fire prevention materials.

Both general areas of relief sought have not been recommended for acceptance by the Section 42A reporting officer.

Fire and Emergency notes the reporting officer's recommendation not to expand the definition of a hazardous facility. Whilst it is acknowledged that such facilities are subject to controls under other legislation with regard to their operation and storage of chemicals, Fire and Emergency considers that the potential for significant hazardous substance events from these sites, and the associated long-lasting environmental effects, warrants consideration of such facilities under land use planning.

The reporting officer states "While some expansion may be justified where clear residual land-use risk has been identified, further evidence would be required to support inclusion of additional broad activity categories". Due to the fluctuating and sometimes confidential nature of the inventories held on site at such facilities, Fire and Emergency cannot provide exact data on the types or volumes of hazardous substances which are present at such facilities.

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Fire and Emergency therefore seeks that the Hearing Panel reconsider the inclusion of the broader activity categories identified in Fire and Emergency's original relief.

Of relevance to the Business Hearing Stream, Fire and Emergency also sought relief across all PDP Zones (including all Business Zones) which requires new land use development to provide a compliant firefighting water supply. Whilst subdivisions in the city are required to deliver a compliant firefighting water supply, this does not appear to also extend to new land use development which does not involve a subdivision. The Section 42A Officer has advised that this matter is outside of the scope of the Business Zone Chapters and needs to be considered under the Three Waters topic. When available, Fire and Emergency will review the Section 42A Officer's recommendation on this relief under the Infrastructure Hearing Stream, which includes the Three Waters topic.

Should you have any queries regarding the content of this letter, please contact Jennifer Beardsall, Consultant Planner.

Yours sincerely,



Jennifer Beardsall

Planner

on behalf of

Beca Limited

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