

From: [Alec Duncan](#)
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Subject: External Sender: Fire and Emergency New Zealand Submission - Waipa District Council - Proposed Private Plan Change 37
Date: Tuesday, 28 April 2026 8:39:03 am
Attachments: [Fire and Emergency New Zealand Submission - Waipa District Council - Proposed Private Plan Change 37.pdf](#)

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Kia ora,

On behalf of Fire and Emergency New Zealand, please see **attached** submission on Proposed Private Plan Change 37 - Rider Park Structure Plan.

Ngā mihi,

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Sensitivity: General

Submission on notified Private Plan Change 37 to the Waipā District Plan

Form 5

Clause 6 of the First Schedule to the Resource Management Act 1991

Submitter: Fire and Emergency New Zealand

Contact name: Alec Duncan (Consultant)

Contact number: [REDACTED]

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Address for service: [REDACTED]

This submission is made on behalf of Fire and Emergency New Zealand (**Fire and Emergency**) on Private Plan Change 37: Rider Park Structure Plan (**PPC37**). It is confirmed that:

- Fire and Emergency could not gain an advantage in trade competition through this submission.
- Fire and Emergency is directly affected by an effect of the subject matter that adversely affects the environment.
- Fire and Emergency **do wish to be heard** in support of its submission.
- Fire and Emergency support in part PPC37, subject to the inclusion of additional rules set out in the sections below.

Fire and Emergency's submission is:

The principal objectives of Fire and Emergency are to reduce the incidence of unwanted fire and the associated risk to life and property. In relation to the main functions of Fire and Emergency under section 11¹ and the additional functions of Fire and Emergency under section 12² of the Fire and Emergency New Zealand Act 2017, Fire and Emergency seek to:

- protect and preserve life,
- prevent or limit injury,
- prevent or limit damage to property and land, and
- prevent or limit damage to the environment³.

Fire and Emergency's interest in District Plans is grounded in how plan provisions directly affect its ability to carry out its operational functions under sections 11 and 12 of the Fire and Emergency New Zealand Act 2017. District Plans shape the physical environment in which those functions must be performed. In this regard, Fire and Emergency has an interest in PPC37 because the development it enables directly affects Fire and Emergency's ability to carry out its statutory operational functions, including fire prevention and suppression, rescue of trapped persons, urban search and rescue, and response to hazardous substances and natural hazard events. District Plan provisions determine the physical form, access, servicing, and intensity of development, which in turn shape the environments in which Fire and Emergency must respond. Medium density development can increase the scale, frequency, and complexity of incidents, places greater demands on firefighting water supply and emergency access and can increase risks to occupants and responders if not appropriately planned. Fire and Emergency's submission therefore seeks to ensure that the

¹ Fire and Emergency New Zealand Act 2017 section 11(2)

² Fire and Emergency New Zealand Act 2017 section 12(3)

³ Fire and Emergency New Zealand Act 2017 section 10(a)(b)

proposed provisions of PPC37 enable growth in a manner that is serviceable, safe, and resilient, and that avoids embedding avoidable emergency risk into the built environment.

Firefighting water supply

Fire and Emergency's primary objective is to reduce the incidence of unwanted fire and the associated risk to life and property. Achieving this objective is contingent on adequate and reliable firefighting water supply being available before development occurs. The plan change area sits outside the Cambridge Water Supply network and is currently served by a limited rural supply that does not provide the level of capacity and pressure required for firefighting. While the Water Assessment provided as part of PPC37 indicates that an FW2 reticulated level of service may be achieved through network upgrades and future connections to the wider reticulated system, the ability to service the full area remains uncertain and dependent on further modelling and infrastructure delivery. For this reason, it is important that the PPC37 framework establishes the requirement for developers to provide, and for Council to assess, the availability of firefighting water supply at future subdivision and land use stages.

Section 15 – 'Infrastructure, Hazards, Development and Subdivision' of the Operative Waipā District Plan sets out the firefighting water supply requirements. Rule 15.4.2.18 requires all lots in a subdivision and any sites in a development in the Medium Density Residential and Commercial Zones *within the urban limits* to be connected to Council's water supply for firefighting purposes. Based on the PPC37 documentation, it does not appear as though PPC37 intends to extend the urban limit on the Waipā District Planning maps to capture the plan change area. As such, this would mean that the PPC37 area would not be subject to Rule 15.4.2.18 and future development would not be subject to the additional infrastructure servicing requirements. The default Rule 15.4.2.23 applies to subdivision and development where *water is not supplied by Council or a private community supply, or water is supplied by Council but is a restricted flow supply*. This rule is unlikely to be applicable either, as the plan change area will be serviced.

This highlights a statutory gap between the proposed PPC37 framework and the current Operative Waipā District Plan provisions, which, when read together, do not clearly or enforceably require firefighting water supply outcomes proportionate to the medium density development enabled.

It is notable that Council's Regional Infrastructure Technical Specification (**RITS**) was updated in October 2025, with a key amendment requiring a minimum firefighting water supply service level of FW3 for all areas not otherwise specified, including medium density residential development. This should be a consideration at the time of subdivision when further water supply modelling and design considerations specific to the Operative Waipā District Plan can be expected. Given the growth enabled by PPC37 and the associated increase in demand on Fire and Emergency as an emergency service provider, Fire and Emergency would strongly support the adoption of FW3 as the minimum design standard. This would enable future homeowners to install fire protection sprinkler systems, should they elect to do so.

As RITS is a non-statutory engineering and construction standard, it is critical that the Operative Waipā District Plan includes clear and enforceable provisions requiring the future water supply network to be designed and constructed in accordance with SNZ PAS 4509:2008 Firefighting Water Supplies Code of Practice, so that firefighting water supply is appropriate for, and with water flows proportionate to, the anticipated land uses enabled by PPC37. If this does not become part of the consenting regime, this could result in development proceeding with inadequate firefighting water supply with potentially serious consequences for life and property, with this risk increasing as a result of climate change impacting on existing water sources, and other environmental and demographic changes across communities of which fire will present a greater and more frequent risk.

Fire and Emergency seeks the following decision from Council:

1. That the urban limit be extended to include the PPC37 area so that Rule 15.4.2.18 applies; or

2. A specific rule be inserted in the Waipā District Plan via PPC37 be introduced requiring that *'all buildings within the Rider Park Structure Plan area must be provided with a water supply in accordance with the New Zealand Fire Service Firefighting Water Supply Code of Practice SNZ PAS 4509:2008'*.

This approach aligns with the requirements of RITS.

Fire and Emergency would welcome any questions or further engagement on matters raised in the submission within.

Signature of person authorised to sign on behalf of Fire and Emergency



Alec Duncan

Beca Limited

Dated: 28 April 2026