

Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Waipā District Council

Submission from: Fire and Emergency New Zealand

Address for Service Beca Limited
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 Attention: Alec Duncan
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This submission is made on behalf of Fire and Emergency New Zealand (**Fire and Emergency**) to Waipā District Council (**WDC**) on the Proposed Plan Change 25 - Shelterbelts and Artificial Crop Structures (**PPC25**) to the Waipā District Plan (**WDP**).

Fire and Emergency **could not gain** an advantage in trade competition through this submission.

Fire and Emergency **support** PPC25, subject to minor amendments sought in its submission.

1. Background:

The principal objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. 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 environment¹.

Fire and Emergency’s main functions are—

- (a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and
- (b) to provide fire prevention, response, and suppression services; and
- (c) to stabilise or render safe incidents that involve hazardous substances; and
- (d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and
- (e) to rescue persons who are trapped as a result of transport accidents or other incidents; and
- (f) to provide urban search and rescue services².

¹ Fire and Emergency New Zealand Act 2017 section 10(a)(b)

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

Fire and Emergency also has additional functions to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform their main functions efficiently and effectively³.

Fire and Emergency's interest in PPC25 relate specifically to fire risk management and risk reduction. This submission seeks to:

- Enable consideration of fire risk management as part of the resource consent process for shelterbelts.
- Enable Fire and Emergency to carry out its objectives and functions under the Fire and Emergency New Zealand Act 2017 to provide protection of people, property and the environment in the event of a fire emergency.

2. Fire and Emergency submission:

2.1 Shelterbelts

Shelterbelt fires are common across New Zealand. Shelterbelts can increase wildfire risk due to where they are planted, what species is used, and how they are managed (i.e., what height they grow to, removal of trimmings and other dead vegetation).

Many traditional shelterbelt species such as pines and macrocarpa are highly flammable. This is because these species retain dead material within their canopy, produce fine fuels (needles, twigs) and contain oils and resins that ignite easily.

By design, shelterbelts create long continuous corridors that can act as fuel corridors for fire spread. Shelterbelts are often planted close to houses, sheds, fences and other infrastructure, increasing the likelihood that a vegetation fire will spread to assets. If not actively managed, over time, shelterbelts can accumulate debris and foliage, grass and weeds at the base or decaying trees. Through climate change and more hot, dry and at times windy conditions, shelterbelts can become more susceptible to ignition and rapid fire spread.

Fire and Emergency **support** the PPC25 permitted activity standard 4.4.2.57A which include standards that have co-benefits for fire risk management. These include:

- **4.4.2.57A a.** – a maximum height of a shelterbelt planted to 6m above ground level, where located within 20m of a property boundary. A reduced height can help reduce fire risk because lower shelterbelts generally contain less total fuel and makes maintenance easier when located along property boundaries.
- **4.4.2.57A b.** – a minimum setback of any shelterbelt from a road boundary shall be 4m, unless the shelterbelt at its mature height can be maintained from within the boundaries of the subject site. Setbacks between shelterbelts and road boundaries provide multiple fire safety benefits including reduced fire intensity near the road which keeps the road open for firefighting and evacuation and improves access for maintenance and fuel load reduction.
- **4.4.2.57A c.** – similarly, a minimum setback of any shelterbelt planted from an internal boundary shall be 4m (subject to exceptions), can reduce fire intensity and radiant heat near boundaries, break fuel continuity and improve access for firefighting and maintenance.
- **4.4.2.57A d. iv.** – no shelterbelts to be located within 10m of the outer conductor (wire or cable) for an overhead power line or telephone line. Trees or branches that grow too close to powerlines can cause electrical sparking on contact, which can ignite vegetation, especially during dry conditions. Fire and Emergency support the advice note that refers to the Electricity (Hazards from Trees) Regulations 2003. These regulations also set growth limits and cut back zones.
- **4.4.2.57A e.** - Shelterbelts shall be maintained by the landowners. Maintaining shelterbelts is essential as it reduces fire ignition and spread, decreases hazard from high-flammability species, prevents electrical faults, sparking, and outages and ensures safe access for emergency services and maintenance.

Where compliance is not achieved with the above standards, resource consent is required as a restricted discretionary activity. This is supported by Fire and Emergency. However, to provide WDC the explicit ability to

³ Section 12(3)(e) of the Fire and Emergency New Zealand Act 2017

decline an application or impose consent conditions, should a shelterbelt present an unacceptable fire risk due to non-compliance with the new performance standards, Fire and Emergency request that an additional matter of discretion be included to explicitly enable the consideration of 'fire risk'.

An addition to Section 21 - Assessment Criteria and Information Requirements - Assessment Criteria for shelterbelts (21.1.4.13) is also sought for the same reason.

2.2 Artificial crop protection structures and crop support structures

Artificial crop protection structures and crop support structures, while still a fire fuel, are less of a fire risk due to their limited density of fuel source. This is comparable to shelterbelts where at maturity, and subject to size, scale and vegetation type, moisture content and management, can be more susceptible to ignition and rapid fire spread.

For crop covers, Fire and Emergency would encourage landowners to consider fire suppression systems such as having a suitable firefighting water supply nearby due the likelihood of restricted emergency service access during a fire and to reduce the risk to the loss of crop assets.

No amendments are sought to the artificial crop protection structures and crop support structures rule framework in this regard.

2.3 Fire risk management measures

There are several methods available to manage fire risk when planting shelterbelts. This includes (but not limited to):

- Selecting **Low flammability plants**. This information is set out on Fire and Emergency's website⁴.
- Creating **defensible spaces** from buildings, assets, roads and infrastructure. As an example, Fire and Emergency's defensible spaces guidance strongly recommends shelterbelts are setback at minimum, 30 metres from any dwellings. This is to reduce the risk of radiant heat from a shelterbelt fire igniting or spreading to dwellings and associated assets. This information is set out on Fire and Emergency's website⁵.
- Providing **adequate access** and **egress**. Often shelterbelts are planted along accessways. Should a shelterbelt fire occur, this may inhibit emergency and access and egress. When designing and planting shelterbelts, consideration should be given to the ability for emergency responders to access a property, but also for occupants to leave a property in a fire emergency. This is particularly important when there is no secondary access to / egress from a property.

3. Fire and Emergency seeks the following decision from the local authority:

Fire and Emergency seek the following relief:

Add new matter of discretion to 4.4.2.57 A, as follows:

Activities that fail to comply with this rule will require a resource consent for a restricted discretionary activity with the discretion being restricted over:

- The fire risk associated with surrounding structures, assets and infrastructure.

Add new assessment criteria to 21.1.4.13 Shelterbelts (4.4.2.57A):

- e. The fire risk management measures to manage any identified effects on surrounding structures, assets and infrastructure.

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

⁴ <https://www.checkitsalright.nz/reduce-your-risk/low-flammability-plants>

⁵ <https://www.checkitsalright.nz/reduce-your-risk/protecting-your-property>

Fire and Emergency does **wish to be heard** in support of its submission.



Alec Duncan, Consultant Planner

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

Date: 19/02/2026