

Private Plan Change 85: Mangawhai East
Kaipara District Council
Emailed to: planchanges@kaipara.govt.nz

16 February 2026

Attention: Hearing Commissioners

Fire and Emergency New Zealand – Private Plan Change 85: Mangawhai East

On behalf of Fire and Emergency New Zealand (**Fire and Emergency**), I request that this letter is tabled at the hearing of Private Plan Change 85 (**PPC85**) commencing on 17 February 2026.

Fire and Emergency has reviewed Kaipara District Council's (**KDC**) and the Applicant's primary evidence and rebuttal evidence. For the purposes of this letter, the updated Development Area Provisions set out in the Statement of Rebuttal Evidence of Jonathan Guy Cleave (S42A Reporting Officer) dated 9 February 2026 has been relied on. These are understood to be the latest set of Development Area Provisions.

This letter confirms Fire and Emergency's position on the recommendations presented in Appendix 1 of Mr Cleave's Statement of Rebuttal Evidence. It is noted that there are several submission points whereby relief sought has been recommended for acceptance by Mr Cleave. This letter focuses on those matters where the recommendation by Mr Cleave has not been to provide the relief (either in full or in part) sought by Fire and Emergency.

Fire and Emergency's submission

Fire and Emergency made a submission ([Submission 60](#)) on PPC85 to the Operative Kaipara District Plan (**KDP**). The relief sought in Fire and Emergency's submission related primarily to the provision of firefighting water supply and emergency service access for subdivision and land use activities in the proposed Mangawhai East Development Area.

R X01 - Residential Zones and Rural Lifestyle Zone

DEV X-LU-R1 Buildings, accessory buildings and structures

Fire and Emergency requested that 'DEV X-LU-R1 Buildings, accessory buildings and structures' be subject to 'DEVX-SUB-S7 Water Supply' as this would require all new buildings in the Residential Zones and Rural Lifestyle Zone to be serviced by a firefighting water supply. This was because, as notified, the land use rule framework only required a 'residential unit', and 'Homestay accommodation' to comply with DEVX-SUB-S7 in Residential Zones and Rural Lifestyle Zone.

This amendment has not been recommended for acceptance by Mr Cleave.

It is recognised that the Residential Zones and Rural Lifestyle Zone primarily provides for residential activities, and that 'DEV X-LU-R2 Residential unit' requires compliance with 'DEVX-SUB-S7 Water Supply'. 'DEV X-LU-R2 Residential unit' was supported by Fire and Emergency for this reason.

While Fire and Emergency's preference is that all buildings be subject to 'DEVX-SUB-S7 Water Supply' as sought in its original submission, it is noted that the proposed rule framework would require resource consent for most

non-residential activities as a discretionary activity and, as such, full discretion would apply. This would include the extent to which the building and associated land use activity can be serviced for firefighting water supply.

For this reason, Fire and Emergency is satisfied with this outcome as it should provide for fire safety and therefore does not wish to pursue this submission point further.

RX 02 - Business Neighbourhood Centre and Business Mixed Use Zones

DEV X-LU-R1 Buildings and accessory buildings

In its submission, Fire and Emergency sought that all new buildings in the Business Neighbourhood Centre and Business Mixed Use Zones be assessed as a restricted discretionary activity if compliance can be achieved with 'DEVX-SUB-S7 Water Supply'.

Based on the proposed coverage of the reticulated water supply network, Fire and Emergency understands that the Business Neighbourhood Centre and Business Mixed Use Zones will be reticulated.

Mr Cleese has addressed the relief sought by Fire and Emergency by recommending the inclusion of an additional matter of discretion as alternative relief, as follows:

“f. The extent to which the building and associated land use activity can be serviced for wastewater, potable, and fire-fighting water supply”.

This recommendation is supported by Fire and Emergency to the extent that all new buildings in the Business Neighbourhood Centre and Business Mixed Use Zones will require resource consent. The inclusion of the additional matter of discretion (f.) would require any new building to be assessed to the extent to which the building and associated land use activity can be serviced for firefighting water supply. If the building and associated land use activity cannot be adequately serviced by a firefighting water supply, then KDC will have the ability to decline an application or impose a condition of consent if necessary.

DEV1 Subdivision Rules

DEVX-SUB-S7 Water Supply

In its submission, Fire and Emergency raised several issues relating to the connection between 'DEV X-R1 Subdivision' and 'DEVX-SUB-S7 Water Supply', as well as the application and structure of 'DEVX-SUB-S7 Water Supply' as a standard.

Mr Cleese has addressed the concerns raised in Fire and Emergency's submission on DEVX-SUB-S7 by:

- Including 'DEV X-SUB- S7 – Water supply' as a compliance matter under DEV X-R1 m. vi. Subdivision.
- Amending 'DEV X-SUB- S7 – Water supply' to include a new sub-standard as follows:

3. *Any allotment or residential unit shall be supplied with water for the purpose of firefighting, at least 10,000 litres of water from sources that are:*

- Within 90 metres of an identified building platform on each lot or the residential unit; and*
- Existing or likely to be available at a time of development of the lot; and*
- Accessible and available all year round.*

Note: Sources may be comprised of water tanks, permanent natural waterbodies, dams, swimming pools, whether located on or off the lot.

This recommendation is supported by Fire and Emergency, as it is generally consistent with the wider KDP framework for fire safety.

Table DEV X Table 1.1 Road, Private Way, Cycle Way and Property Access Legal and Construction Widths

Fire and Emergency sought amendments to Table 1.1 to acknowledge the emergency service access requirements for varying reticulated and non-reticulated scenarios.

Table DEV X Table 1.1 was supported to the extent that private access serving 7-30 units / lots or serving up to 6 units (that is over 50m in length) meets the minimum emergency vehicle access requirements for formation width, surfacing and maximum gradient.

Fire and Emergency acknowledges that, in a scenario where a residential unit or lot is located in an area that is fully reticulated for water supply and any building is within a compliant hose run distances (as set out in SNZ PAS 4509:2008), Fire and Emergency would generally be able to operate from the road in a fire emergency.

However, where there is no reticulated water supply available (including compliant hydrants), new lots would be required to provide an onsite firefighting water supply (i.e., storage tanks) and subsequently, adequate access to that dedicated firefighting water supply would be required.

There may be some cases where non-reticulated lots are road fronting, and Fire and Emergency will be able to access onsite water supply for firefighting use from the road without the need to access the lot with a fire appliance. However, where the onsite firefighting water supply is not accessible from the road, Fire and Emergency would need to access the site via the accessway with a fire (pumping) appliance. Fire and Emergency considers that this should be a matter assessed through the resource consent process, where compliance with the Table DEV X Table 1.1 accessway standards cannot be achieved.

The amendments sought in Fire and Emergency's submission attempted to address this, as shown below:

Road Hierarchy

Private access:

- 1. serving up to 6 units/lots, and*
- 2. less than 50m in length, and*
- 3. Where located in an area with a fully reticulated water supply system (including hydrants) available.*

Private Accessway:

- 1. serving 7- 30 units/lots (not vested), or*
 - 2. serving up to 6 that is over 50m in length, or*
 - 3. Where located in an area that does not have a fully reticulated water supply system (including hydrants) available.*
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The recommendation by Mr Cleese has accepted this in part, however, has recommended slightly different wording which changes the intent of the relief sought. This change relates to the reference to 'and' as opposed to 'or' (as sought by Fire and Emergency).

In recent discussions with Mr Cleese, he advised that the intent was to agree with the relief sought by Fire and Emergency as set out in its submission.

For Table DEV X Table 1.1 to be clear as to its requirements and to make sure all development scenarios are covered to enable Fire and Emergency to access new lots and / or residential units including the firefighting water supply source available, an alternate table layout is suggested as a potential alternative to the wording in Fire and Emergency's submission for the Panel's consideration. This revised structure does not change the intent of Fire and Emergency's submission but splits out the accessway scenarios into a more logical sequence. Otherwise, Fire and Emergency requests that the wording sought by Fire and Emergency in its original submission be accepted as part of the Panel's decision.

Table DEV X Table 1.1 Mangawhai East Development Area Road, Private Way, Cycle Way and Property Access Legal and Construction Widths

Road Hierarchy	Minimum Legal Width	Minimum Formation Width	Minimum Cycleway / Footpath Width	Surface	Maximum Design Speed	Minimum Radius (m)	Minimum SSD (m)	Maximum Grade
Private access serving up to 6 units/lots and less than 50m in length <u>and where located in an area with a fully reticulated water supply system (including hydrants) available.</u>	3.6m	3m	0.5m (one side only where footpath is not provided separately)	seal	30km/h	6m subject to vehicle tracking for anticipated design vehicle	-	20% Note: transition between two gradients shall not exceed 12.5%. if they do, separate transition gradient must be provided over a length no less than 2m
Private Accessway serving up to 6 that is over 50m in length, <u>or where located in an area that does not have a fully reticulated water supply system (including hydrants) available.</u>	9.5m	5.5m (no on street parking)	1.5m (one side only where footpath is not provided separately)	seal	30km/h	6m subject to vehicle tracking for anticipated design vehicle	30m*	12.5%
Private Accessway serving 7- 30 units/lots (not vested) <u>or serving up to 6 that is over 50m in length</u>	9.5m	5.5m (no on street parking)	1.5m (one side only where footpath is not provided separately)	seal	30km/h	6m subject to vehicle tracking for anticipated design vehicle	30m*	12.5%

Table DEV X Table 1.2 Required Tank Volumes for On-site Residential Water Supply

Fire and Emergency’s submission on Table DEV X Table 1.2 sought clarification as to the application of this table.

In the evidence of Melissa Pamela Parlane (technical specialist on water supply) on behalf of KDC dated 1 December 2025, Ms Parlane (in paragraph 9.3) clarifies that this table does not include firefighting water and that an additional 10,000L per property must be provided if on-site firefighting capacity is preferred.

To avoid any ambiguity, Fire and Emergency suggests that this table is amended to specify that this table relates to potable water supply only, as follows:

Table DEV X Table 1.2 Required Tank Volumes for On-site Residential **Potable** Water Supply

Roof Catchment (m ²)	Bedrooms				
	1	2	3	4	5
100	20m ³	50m ³			
120	15m ³	35m ³			
140	10m ³	30m ³	75m ³		
160		20m ³	60m ³		
180			50m ³	75m ³	
200			45m ³	65m ³	
220			35m ³	55m ³	90m ³
240			30m ³	50m ³	80m ³
260			30m ³	45m ³	70m ³
280				40m ³	65m ³
300				35m ³	60m ³

Fire and Emergency requests that the Panel consider further the matters discussed in this letter.

Should you have any further queries, please contact Alec Duncan, consultant planner, on 07 960 7259 or alec.duncan@beca.com.

Yours sincerely



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On behalf of Fire and Emergency New Zealand