

Taupō District Council  
Sent via email

18 June 2026

**Attention: Independent Hearings Panel**

Dear David Hill (Chair) and Eugene Berryman-Kamp

**Fire and Emergency New Zealand Hearing statement on Proposed Plan Change 47 – Māori Purpose Zone**

Fire and Emergency New Zealand (**Fire and Emergency**) lodged a submission on Proposed Plan Change 47 (**PPC47**) to ensure that the Taupō District Plan (**TDP**) adequately provides for fire safety, firefighting water supply and emergency access within the proposed Māori Purpose Zone (**MPZ**).

Fire and Emergency will not be attending the hearing on Monday, 22 June 2026 to speak to its submission. Instead, this letter sets out a summary of Fire and Emergency's submission, the section 42A report recommendations in relation to Fire and Emergency's position, and Fire and Emergency's response to those recommendations for the Hearing Panel's consideration when making its recommendation to TDC on PPC47.

**Summary of Fire and Emergency's submission**

Fire and Emergency's key concern is that the current proposed provisions do not sufficiently ensure that development is supported by appropriate infrastructure for firefighting operations, which is critical to protecting people, property and the environment from the risks of fire.

Key issues raised in Fire and Emergency's submission include:

**1. Firefighting water supply**

The TDP relies on the Code of Practice for Development of Land 2009 but does not clearly require compliance through enforceable TDP provisions. Fire and Emergency considers this creates a statutory gap, meaning new development may proceed without adequate water supply for firefighting. Adequate water supply (including pressure and access) must be available before development occurs, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

**2. Emergency vehicle access**

The proposed provisions do not include minimum access and design standards for emergency vehicles within the MPZ. Lack of standards risk developments being designed without safe or practical access for emergency response.

Relief sought in Fire and Emergency's submission include:

- **New servicing standard (MPZ-S9):** To require all new buildings in the MPZ to provide a firefighting water supply compliant with SNZ PAS 4509:2008.
- **Amendment to permitted activity rule (MPZ-R1):** To require compliance with the new firefighting servicing standard sought above.
- **Additional matter of discretion (MPZ-R2):** To enable TDC to assess non-compliance with the new firefighting water supply standard.

- **Access standards added to district-wide transport provisions:** To introduce minimum requirements for accessways (e.g. width, gradient) to ensure emergency vehicle access is required for development in the MPZ.

Overall, Fire and Emergency supported the intent of PPC47, but oppose aspects of the current provisions to the extent they fail to ensure adequate firefighting water supply and emergency access. The requested amendments are considered necessary to ensure development occurs safely and aligns with Fire and Emergency's statutory responsibilities.

## Section 42A report recommendations

The reporting officers have rejected the relief sought in relation to the firefighting water supply relief. TDC officer's reason for this recommendation is that *"provision of rural firefighting water is something currently addressed through engineering codes of practice and the Building Act. No amendment to provisions is recommended in response"*.

In relation to the relief sought to the access provisions, the reporting officers have accepted in part the relief sought, recommending an explanatory note to TRAN-R4 10 stating that: *"Note: For the purposes of Tran-R4 10 and Table 1 Rural Zones include MPZ-Rural and Residential Zones include MPZ-Urban"*. TDC staff consider this change will ensure clarity that the appropriate access standards apply to Māori Purpose Zone.

## Fire and Emergency's position statement

### 1. Firefighting water supply

Fire and Emergency does not support TDC's conclusion that rural firefighting water supply is adequately addressed through TDC's engineering code of practice<sup>1</sup> and the Building Act, and that no PPC47 amendment to the TDP is required.

As identified in Fire and Emergency's submission, the TDP contains no explicit or enforceable requirement for firefighting water supply, and there is no clear link under PPC47 requiring development in the MPZ to comply with TDC's Code of Practice for Development of Land. This creates a clear regulatory gap whereby development may proceed without a reliable or operable firefighting water supply.

Fire and Emergency considers that reliance on non-RMA mechanisms introduces significant and unmanaged risk. Further, the Building Act does not consistently apply to all development, nor does it require that water supply is available in the form, location and capacity required for emergency response.

This gap results in a heightened risk to life, property, and the environment, particularly in rural areas where firefighting is dependent on alternative water sources. Without adequate provision, fires are more likely to escalate, response effectiveness is reduced, and consequences become more severe.

Importantly, this also creates material risk to TDC, by enabling development without essential infrastructure to manage a known hazard, potentially undermining its ability to meet its statutory obligations under the RMA to protect health and safety and avoid or mitigate adverse effects. It further creates operational and safety risk to Fire and Emergency by constraining its ability to respond effectively and safely, and to fulfil its statutory functions in protecting communities.

Given the foreseeable and high-consequence nature of these risks, Fire and Emergency considers that reliance on indirect or non-statutory mechanisms is inappropriate. Clear and enforceable TDP provisions are required.

<sup>1</sup> We understand Council to be referring to [Taupo District Council Code of Practice for Development of Land](#) adopted 29 September 2009 which is to be read in conjunction with NZS 4404: 2004 Land Development and Subdivision Engineering,

Accordingly, Fire and Emergency maintains its relief seeking a new standard requiring firefighting water supply in accordance with SNZ PAS 4509:2008, to ensure that development enabled by PPC47 is appropriately serviced and does not create unacceptable risk.

## **2. Emergency vehicle access**

In relation to the recommended addition of the explanatory note to *TRAN-R4 10: Minimum Standards for Driveways and Accessways*, Fire and Emergency supports this amendment. This support is on the basis that it would ensure development within the MPZ is subject to existing standards that generally align with Fire and Emergency's emergency vehicle access requirements, thereby providing safer and more practical access for emergency response than currently proposed under PPC47.

Thank you for considering this hearing statement.

Yours sincerely



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