

BEFORE THE HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission by Fire and Emergency New Zealand
(Submitter 07) on the Proposed Plan Change 8 (Natural
Hazards) to the Rotorua District Plan

**PRIMARY STATEMENT OF EVIDENCE OF ALEC DUNCAN ON
BEHALF OF
FIRE AND EMERGENCY NEW ZEALAND**

Dated: 2 April 2026

INTRODUCTION

1. My full name is Alec Duncan.
2. I am a Senior Planner at Beca Limited (**Beca**). I hold a Bachelor of Environmental Planning from the University of Waikato. I am an Intermediate member of the New Zealand Planning Institute.
3. I have eight years' experience in planning practice, during which time I have undertaken a broad range of both resource consenting and policy planning work including advice in relation to the preparation of planning documents.
4. Beca has a longstanding contract with Fire and Emergency New Zealand (**Fire and Emergency**) to review and respond to notified district and regional plans, plan changes, resource consents and other proposals that may impact on Fire and Emergency's property and operations across New Zealand. I have been involved in the delivery of planning advice under this contract since 2018 and, as such, am familiar with Fire and Emergency's role and responsibilities under the Fire and Emergency New Zealand Act 2017 along with the way in which district plans provide for the organisation's operational and property needs.
5. I supported Fire and Emergency in the preparation of its submission on Proposed Plan Change 8 (Natural Hazards) to the Rotorua District Plan (**PPC8**).

CODE OF CONDUCT

6. While not an Environment Court hearing, I have read the code of conduct for expert witnesses in the Environment Court Practice Note 2023. I agree to comply with this code of conduct. The evidence in my statement is within my area of expertise, except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might also detract from the opinions I express.

SCOPE OF EVIDENCE

7. Fire and Emergency is a statutory emergency response agency with national responsibilities for fire prevention, suppression, hazardous substance incidents, urban search and rescue and response to natural hazard events (among other matters). Its interest in PPC8 arises from the need to ensure that land use, subdivision and development decisions do not create unacceptable risks to life and property, nor undermine effective emergency response capability.
8. Fire and Emergency also noted in its submission that 'Wildfire' is recognised as a National Risk by the Department of Prime Minister and Cabinet, with Fire and Emergency identified as the risk-coordinating agency for wildfire as a national hazard. 'Wildfire' as a National Risk is defined as being '...an unwanted, uncontrolled fire which occurs within an area of combustible vegetation, often moving rapidly across the landscape. Although wildfires most commonly occur in rural areas, they may occur within urban environments.'
9. Fire and Emergency's submission (07) broadly supports the direction and intent of PPC8, particularly its:
 - Risk-based framework for natural hazard management,
 - Emphasis on climate change resilience, and
 - Improved recognition and management of wildfire risk.
10. However, Fire and Emergency sought targeted amendments where provisions are considered to create operational risks or gaps in hazard mitigation, particularly in relation to wildfire and firefighting water supply.
11. Fire and Emergency's most significant concern is that PPC8 proposes to limit firefighting water supply standards for both subdivision and land use to papakāinga and more densely developed zones (including Rural 2 Zone, Rural 3 Zone, and both the Settlement Management Areas and Bush Settlement

Management Areas in the Lakes A Zone). This means that firefighting water supply requirements are proposed not to apply to the Rural 1 Zone, the Conservation (Reserve 1) Zone or other management areas in the Lakes A Zone.

12. The reporting officers have recommended acceptance of Fire and Emergency's request to amend the definition of 'wildfire' as well as recommended acceptance of Fire and Emergency submission points that have sought to retain several strategic direction objectives and policies that generally align with Fire and Emergency's risk reduction strategy¹.
13. My evidence focuses on matters where the recommendation by the reporting officers has been to accept in part or reject the relief sought by Fire and Emergency. These matters all relate to the topics of wildfire and firefighting water supply. The specific provisions are:
 - Natural hazards chapter: NH-P5
 - Subdivision chapter: SUB-P16
 - Subdivision chapter: SUB-S9(3)(b) Site Serviceability
 - Rural Zones chapter: RURZ-S5A Servicing
 - Lake A Zone chapter: Rule 34.1.1
14. For ease of reading, for each group of provisions, my evidence provides:
 - A summary of Fire and Emergency's submission.
 - A summary of the reporting officers' recommendations.
 - My response to the reporting officers' recommendations.

¹ <https://www.fireandemergency.nz/assets/Documents/Files/RiskReductionStrategy-2019-2029.pdf>

PLANNING EVIDENCE

Natural hazards chapter: NH-P5

15. Summary of submission: Fire and Emergency supported Policy NH-P5 in principle, as it appropriately recognises wildfire as a natural hazard requiring assessment and mitigation in response to increasing climate and development-related risk; however, targeted amendments have been sought to ensure the policy is effective. In particular, Fire and Emergency considers that NH-P5 should explicitly apply to subdivision as well as development, so wildfire risk can be addressed at the earliest and most effective stage of land use planning, including through subdivision layout, access, servicing and design. Fire and Emergency also sought amendments to ensure firefighting water supply requirements are not limited only to the more densely populated zones, as adequate and reliable water supply is critical to protecting life and property and enabling effective wildfire and structural fire response across all zones, including rural and interface areas. Further refinement has been sought in the submission to better reflect defensible space principles, including the choice and location of vegetation to reduce fire spread. Subject to these amendments, Policy NH-P5 is considered in the submission as an important and positive improvement to the natural hazard framework of the Rotorua District Plan.

16. Reporting officer's recommendation: The reporting officer has accepted in part Fire and Emergency's requested refinement to Policy NH-P5(2)(c) to clarify "choice and location of plant species in relation to buildings and accessways to reduce the risk of fire spread". The reporting officer has also recommended a minor wording change in Policy NH-P5 to refer to 'land use and subdivision' instead of 'development' for consistency. The recommended changes as per Appendix 4 of the Section 42A report are shown in blue (excerpt):

Wildfire

NH-P5	<p>Mitigate the risks of wildfire associated with land use and subdivision and development by:</p> <ol style="list-style-type: none">1. Requiring firefighting water supply for activities in more densely populated zones and papakāinga to reduce the risk of wildfire occurring.2. Encouraging subdivision design in rural areas and at the rural-urban fringe to consider the potential risks of wildfire and, where appropriate, include measures that may help reduce the risks. Such measures may include:<ol style="list-style-type: none">a. identifying suitable locations for building platforms and accessways that reduce exposure to wildfire hazards and facilitate egress;b. facilitating access for emergency services; andc. choice and location of plant species in relation to buildings and accessways to reduce the risk of fire spread.
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17. My response: I support the amendments recommended by the reporting officer. In particular, the requirement to mitigate the risks of wildfire associated with both land use and subdivision. I also support the use of the term 'land use' instead of 'development' as it enhances consistency across the district plan.
18. The reporting officer has not supported the amendment sought in Fire and Emergency's submission to NH-P5(1) to delete reference to "in more densely populated zones and papakainga". This matter correlates to concerns raised and the relief sought associated with SUB-P16, SUB-S9(3)(b), RURZ-S5A Servicing and Rule 34.1.1. I address this matter from paragraph 23 onwards.

Subdivision chapter: SUB-P16

19. Summary of submission: Fire and Emergency supported SUB-P16 in part, to the extent that it requires subdivision applications to demonstrate sufficient and reliable water supply capacity, including for firefighting purposes. However, Fire and Emergency's submission does not support the notified limitation of this requirement to more densely populated zones. Fire and Emergency considers that adequate firefighting water supply is a critical risk-reduction measure that must be addressed at the subdivision stage for all zones, including Rural Zone 1 and other low-density areas, which collectively cover a significant proportion of the district and are often exposed to elevated wildfire and

access constraints. Restricting the policy risks creating gaps in long-term servicing outcomes and may undermine the ability for Fire and Emergency to respond effectively to both structural fire events and wildfire. Accordingly, Fire and Emergency sought amendment to ensure SUB-P16 requires all subdivisions to demonstrate sufficient and reliable firefighting water supply capacity, regardless of zoning, to support safe development patterns and effective emergency response.

20. Reporting officer's recommendation: The reporting officer recommends that Fire and Emergency's submission point seeking the wider application of firefighting water supply requirements across all zones be rejected and that the original notified proposal to apply these requirements only within the more densely populated zones, be retained. The reporting officer has accepted some changes including the addition of "and reliable" and "all year round" which was relief sought by Fire and Emergency. The recommended changes as per Appendix 4 of the Section 42A report are shown in blue (excerpt):

SUB-P16 [13.3(5)(2)]	Ensure applications for subdivisions demonstrate that the water supply capacity, including capacity for firefighting purposes, is sufficient <u>and reliable</u> for the development, <u>and includes capacity for firefighting purposes all year round in the more densely populated zones.</u>
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21. My response: The reporting officer has not supported the amendment sought in Fire and Emergency's submission to delete reference to "in the more densely populated zones". This matter is closely related to concerns raised by Fire and Emergency and the relief sought associated with SUB-P16, SUB-S9(3)(b), RURZ-S5A Servicing and Rule 34.1.1. This matter is collectively addressed from paragraph 23 onwards.

SUB-S9(3)(b) Site Serviceability

22. Summary of submission: Fire and Emergency opposed the notified amendment to SUB-S9(3)(b) that exempts the Rural 1 Zone and Conservation (Reserve 1) Zone from the requirement to

provide a water supply adequate for firefighting purposes at the subdivision stage. It is noted that Fire and Emergency does not oppose the exemption of the Water Zone from this standard.

23. Fire and Emergency considers that this change creates a significant and unintended servicing gap, particularly given the large geographic extent of these zones and their exposure to wildfire and access constraints. It seeks retention of firefighting water supply requirements for subdivision in these zones to ensure long-term risk reduction and effective response to both structural fires and wildfire.
24. Reporting officer's recommendation: The reporting officer has rejected the relief sought by Fire and Emergency. As set out in paragraph 9 of the Section 42A report, the reporting officer remains of the view that firefighting water supply standard SUB-S9(3)(b)(f) for subdivision should only apply to more densely developed zones (i.e., not Rural 1 Zone and the Conservation (Reserve 1) Zone). The reporting officer appears to correlate the risk of wildfires starting, and the consequences, to greater population. There are no recommended changes to this standard which remains as notified, as per Appendix 4 of the Section 42A report (excerpt):

3. Infrastructure Performance Standards

...

b. Water services

- a. All existing available water services shall be extended wherever practically possible. Council will consider the capacity of the existing utility service to connect to each new site within the subdivision, to service future land use in the catchment, and the adequacy of the existing utility services available, including potential to upgrade such services to ensure adequate capacity;
- b. New water services shall be provided for within road reserves;
- c. Unless otherwise provided for by this plan, all services are expected to be entirely underground;
- d. The services to each site shall be independent from the point of supply and to the point of discharge;
- e. All existing water services serving the sites in the subdivision and that are located on adjacent sites must be identified, including all existing and proposed easements associated with the provision of water services; and
- f. The water supply shall be adequate for fire-fighting purposes, except in the Rural 1 Zone, Conservation Zone and Water Zone.

25. My response: All subdivision activities across all zones of Rotorua district requires resource consent. Based on the operative district plan provisions, all subdivision of sites or buildings is subject to SUB-S9 – Site serviceability. This includes subdivision in the Rural 1 Zone and the Conservation (Reserve 1) Zone.
26. SUB-S9 - Site serviceability sets the infrastructure performance standards for subdivision including requirements for water services. The operative district plan requires new sites created by subdivision across all zones to provide water services. The water supply provided is required to be adequate for firefighting purposes. The requirement for an adequate firefighting water supply at the subdivision stage is not limited to wildfire-specific risk management. Its primary purpose is to ensure that buildings enabled through subdivision can be adequately protected from fire. This is a fundamental component of avoiding, remedying, or mitigating adverse effects associated with fire, consistent with the purpose and principles of the RMA.
27. PPC8, a natural hazards plan change to the operative district plan, as notified, proposes to remove this requirement for subdivision in the Rural 1 Zone and the Conservation (Reserve 1) Zone.
28. Rotorua Lakes Council has confirmed that Rural 1 Zone represents **72.6%** of the district. The Conservation (Reserve 1) Zone represents **4.891%** of the district.
29. This change to PPC8 means that subdivision across a combined **77.491%** of the total district would no longer be required to provide a water supply adequate for firefighting purposes at subdivision (and land use). This presents an increased fire risk across the Rotorua district and to Fire and Emergency as an emergency responder.
30. While it is acknowledged that development in the Rural 1 Zone and the Conservation (Reserve 1) Zone is expected at lower

densities (based on the zones purpose and site design performance standards), the planning framework provides for subdivision and associated development across 77.491% of the district in theoretical terms. This could see subdivision or development occur comprehensively or evenly across the Rural 1 Zone and the Conservation (Reserve 1) Zone over time. Subdivision of sites or buildings in Rural 1 Zone is a discretionary activity. Subdivision of sites or buildings in the Conservation (Reserve 1) Zone is a controlled activity.

31. Based on the Section 32 Report and the analysis in the Section 42A Report (refer paragraph 13), I understand that the primary evidence behind this amendment is based on the probability that the likelihood of fire occurring is higher in more densely populated zones where activities are concentrated.
32. Based on my experience with working with Fire and Emergency, fires can start anywhere, as illustrated in the maps presented in **Attachment 1**. I consider that relying on population density as the primary proxy for ignition risk and operational effectiveness of providing a firefighting water supply is misplaced. Wildfire and structure (building) fire risks are increasing in peri-urban and rural areas due to climate change and land use patterns, with longer response times making on-site firefighting water supply more, not less, critical outside dense zones. A density-based performance standard misses high-consequence, low-density activities (e.g., large industrial / storage sites or lifestyle lots that are enabled throughout the Rural 1 Zone).
33. The operative district plan appropriately includes water servicing standards, including firefighting water supply requirements, within the subdivision chapter because subdivision represents the point at which long-term land-use patterns, infrastructure demand and safety outcomes are established. The creation of new allotments as part of subdivision enables future development as of right, and it is therefore necessary to ensure, at the time of subdivision, that land being developed is safe and adequately serviced.

34. I consider that firefighting water supply is a fundamental health and safety measure that gives effect to section 5 of the RMA. The effectiveness of firefighting response is strongly influenced by land use characteristics determined through subdivision, including lot size and layout, access arrangements, development density, and the availability and reliability of water infrastructure. These matters cannot be effectively addressed once titles are created and development has occurred (especially if those activities are permitted by the district plan or remain unregulated at land use).
35. In my opinion, regulating firefighting water supply at the subdivision stage is consistent with the purpose and principles of the Resource Management Act 1991 (**RMA**), particularly:
- Section 5: requires the sustainable management of natural and physical resources, including enabling people and communities to provide for their health and safety, while avoiding, remedying, or mitigating adverse effects. In my opinion, adequate firefighting water supply is directly relevant to that purpose.
36. Fire represents a potential effect of low probability which has a high potential impact. While fire events may be infrequent, their consequences are significant and well understood. The availability and reliability of firefighting water supply materially influences the severity of a fire's impacts on life, property and the wider environment. Providing for this supply is therefore a suitable means of mitigating a known and foreseeable hazard, consistent with section 5 of the RMA.
37. In my opinion, requiring firefighting water supply at subdivision enables subdivision to occur in a manner that supports community health and safety and gives effect to the purpose of section 5 of the RMA.
38. Section 31 - Section 31(1)(a) of the RMA requires Rotorua Lakes Council to provide for the integrated management of the effects of land use and development. Subdivision is the point at which

future development is enabled as of right and where councils retain effective control over servicing outcomes. Firefighting water supply is directly affected by land use decisions such as subdivision density, lot layout, access and servicing design, and must therefore be considered as part of that integrated management function.

39. Subdivision, and subsequent development, increases demand on water supply infrastructure and influences the ability of emergency services to respond effectively to fire events. Through subdivision controls, Rotorua Lakes Council can coordinate land use with infrastructure provision so that development does not occur in a form that creates unmanaged or unacceptable fire risk.
40. Section 31 also provides Rotorua Lakes Council the ability to control the effects of the use, development, or protection of land, including effects on people, property, and the wider environment. The absence of adequate firefighting water supply is a foreseeable adverse effect of enabling development and I consider addressing that risk through subdivision standards falls squarely within this statutory function.
41. In my opinion, requiring firefighting water supply at the subdivision stage is a legitimate exercise of section 31 responsibilities, as it ensures land use is enabled in a manner that is safe, coordinated with infrastructure capacity, and avoids the creation of long-term adverse effects that cannot be effectively addressed once development is enabled.
42. Taken together, section 5 and section 31 of the RMA provide a clear statutory framework that supports the consideration and, where necessary, the requirement of firefighting water supply at the subdivision stage. In my opinion, doing so ensures that development enabled by subdivision occurs in a safe and coordinated manner, avoids foreseeable adverse effects, and better gives effect to the purpose and functions of the RMA.

43. As noted above, all subdivision requires resource consent in the Rural 1 Zone and Conservation (Reserve 1) Zone. The requirement to provide a water service adequate for firefighting purposes does not introduce a resource consent trigger (i.e., subdivision is not a permitted activity regardless). Therefore, a developer could choose not to provide a water service that is adequate for firefighting in the Rural 1 Zone and Conservation (Reserve 1) Zone. The role of the SUB-S9(3)(b)(f) would therefore be to require the developer and Rotorua Lakes Council to assess the risk posed by the absence of provision of a firefighting water supply in that scenario. If that risk is unacceptable, Rotorua Lakes Council could decline that application or impose a condition of consent (including via a consent notice) to mitigate that identified effect. I understand that this is how the operative district plan performance standard is currently applied.
44. I consider that the application of SUB S9(3)(b)(f) to the Rural 1 Zone and Conservation (Reserve 1) Zone provides clarity, certainty and consistency in the resource consent process and across the district. It makes infrastructure expectations clear to applicants and provides a robust statutory framework for the imposition of consent conditions.
45. For these reasons, it is my opinion that subdivision in the Rural 1 Zone and Conservation (Reserve 1) Zone should be required to provide a water supply adequate for firefighting purposes. This is necessary and appropriate to ensure the safe and sustainable development of land.

Rural Zones chapter: Servicing RURZ-S5A

46. Summary of submission: Fire and Emergency supports in part the amendments to the Rural Zones rules that now link specified activities to new performance standard RURZ-S5A Servicing:

RURZ-S5A Servicing

A water supply adequate for firefighting purposes shall be provided to the development in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008.

47. However, Fire and Emergency sought that RURZ-S5A be extended to all Rural Zones land use activities, particularly those that propose a new building, not just RURZ-R9, R12, R13, R14, R15, R17) that relate to 'Residential units', 'Veterinary clinic', 'Retail shop', 'Show homes', 'Office activities' and 'Community housing'. The intent of this relief sought was to include all other new buildings anticipated in the Rural Zones including large rural buildings (e.g., agricultural production). Fire and Emergency supports RURZ-S5A itself, subject to that broader application.
48. Reporting officer's recommendations: The reporting officer does not support the request to extend performance standard RURZ-S5A to apply to all land use activities in the Rural Zones that propose new buildings as this extension is considered un-justified on the evidence available.
49. My response: Following a meeting with Council officers Kim Smith and Simon Thurston on 19 March 2026, it was identified that an error exists in the notified PPC8 provisions. It is now understood that the intent, as detailed in the Section 42A Report, is to not require any land use activities in the Rural 1 Zone to be subject to the new performance standard RURZ-S5A. On this basis, my following evidence is reflective of this, as opposed to what is set out in Appendix 4: Recommended Changes to the District Plan.
50. Enabling land use activities without the need to provide an adequate firefighting water supply presents a significant risk to people, property and the environment. While Fire and Emergency is responsible for operational firefighting response, it is not responsible for providing firefighting water supply. Therefore, the requirements of land use activities in the built environment directly impacts Fire and Emergency's firefighting capabilities and effectiveness.

51. In unreticulated areas like the Rural 1 Zone and the Conservation (Reserve 1) Zone, providing a dedicated, accessible firefighting water supply is critical because fire appliances carry limited water (approximately 2,000L) and tanker shuttles can be slower and capacity constrained. Currently, Fire and Emergency has two water tankers located within the Rotorua district that each hold approximately 12,000L. For context, the current location of these water tankers is shown in **Attachment 1** along with their relative emergency response drive times. This demonstrates that existing resource might be constrained due to multiple and / or significant incidents, therefore Fire and Emergency rely on an adequate firefighting water supply being available on-site for any firefighting response.
52. To not require a firefighting water supply as part of the resource consent process for land use activities, such as new buildings in the Rural 1 Zone and Conservation (Reserve 1) Zone, in certain contexts may limit Fire and Emergency's ability to deliver safe and effective firefighting operations. Without a nearby, compliant and reliable water source, crews cannot safely support rescue and could face significant limitations in the ability to prevent or limit property damage from fire either within a structure or an approaching wildfire.
53. As an example, the operative district plan provides for Primary Rural Industry as permitted activities across the Rural 1 Zone. The reporting officers do not propose Primary Rural Industry buildings be subject to RURZ-S5A. This would mean that new buildings associated with 'Primary Rural Industry' (i.e. agricultural activities) permitted or otherwise by the district plan would not be required to provide a firefighting water supply. Such buildings could contain highly hazardous and / or flammable materials.
54. In the context of wildfire risk, a firefighting water supply provides Fire and Emergency the opportunity for prompt and efficient intervention to contain a structural fire from spreading into the environment and developing into a wildfire as a consequence. In

contrast, a firefighting water supply provided for structural fire protection can be used to protect that structure from wildfire spreading through vegetation, reducing the likelihood of a wildfire causing damage to property and assets. In this regard, firefighting water supply is not solely for Fire and Emergency personnel use. For isolated rural properties where Fire and Emergency's response times may be longer, an onsite firefighting water supply can be used by landowners and the community to undertake initial defensive actions, such as pre-wetting defensible space and controlling ember-caused spot fires, where safe to do so.

55. Failure to require new buildings to provide a firefighting water supply under the district plan as a statutory requirement for land use activities under the RMA would act as an impediment to Fire and Emergency being able to respond effectively to fire emergencies in terms of its statutory mandate under section 11(2)(b) of the Fire and Emergency New Zealand Act 2017. As discussed in Paragraph 38, it is Rotorua Lakes Council's responsibility under section 31 of the RMA to control any actual or potential effects of the use, development, or protection of land including the prevention or mitigation of any adverse effects of the development. I do not support or recommend that Rotorua Lakes Council limit the adoption of SNZ PAS 4509:2008. I am of the view that the approach for which the reporting officers recommend will increase the risk of harm from fire and wildfire.
56. Consistent with my position on the subdivision matter, I maintain that a more proportionate and efficient approach is to apply a district-wide firefighting water supply standard tied to building / activity risk and verified network performance, with flexible pathways to comply via reticulation or alternative supplies, consistent with SNZ PAS 4509:2008 to manage fire risk.

Lake A Zone: Rule 34.1.1

57. Summary of submission: Fire and Emergency supports in part the Lakes A Zone potable water supply rule (34.1.1), agreeing with

alignment to the wider district plan but highlighting that the term “habitable building” is undefined and creates uncertainty. To ensure clarity and fire safety, Fire and Emergency sought an amendment so that all buildings in the Settlement Management Area and Bush Settlement Management Area must have a firefighting water supply that complies with SNZ PAS 4509:2008, along with a minor drafting tidy-up, thereby providing consistent application and better protection for communities in the Lake A Zone.

58. Reporting officer’s recommendations: The reporting officer does not support Fire and Emergency’s request to broaden the application of the performance standard in Rule 34.1.1 of the Lakes A Zone from “habitable building” to “all buildings”. The reporting officer does not agree that uncertainty exists, as “habitable building” is currently defined in the Lakes A Zone as follows: “*Means a building inhabited by humans, and includes a building that is used for temporary accommodation*”. The recommended changes as per Appendix 4 of the Section 42A report are shown in blue (excerpt):

2. Settlement Management Area and Bush Settlement Management Area: Every habitable building shall be provided with a water supply adequate for firefighting purposes with a water supply adequate for firefighting purposes in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008

59. My response: Lake A Zone represents a relatively significant portion of Rotorua district. Rotorua Lakes Council has confirmed the total area of Lakes A Zone equates to **13.2%** of Rotorua District. Of that, the total area of Settlement areas in Lakes A Zone is 0.336%. This means that only a small portion of the Lakes A Zone is required to provide a firefighting water supply where a habitable building is proposed. Notably, the operative district plan firefighting water supply rule (which Rule 34.1.1(3) would replace) applied to all management areas in Lake A Zone.

60. Firefighting water supply in the Lake A Zone is especially important because, much like the Rural Zones, the lake environments face unique risks and challenges compared with urban areas. The key risks and challenges include:
- **Longer response times** - rural fire services often need to travel greater distances to reach an incident. Delays mean fires have more time to develop, so having water immediately available on-site can dramatically reduce fire growth and damage.
 - **Limited reticulated water supply (hydrant) networks** - unlike urban areas, most rural properties typically do not have reticulated water systems or fire hydrants. Fire appliances carry only limited water and tanker capacity is constrained, especially when distances to natural water sources are long. Firefighters often rely on tanker shuttles, ponds, streams, tanks, or static water supplies. If these are not available or accessible, suppression options become extremely limited.
 - **Increased fire load and spread risk** – Lake A Zone contains a significant portion of forest, scrub and vegetation fuels. A lack of sufficient water can allow small fires from structures to become wildfires, threatening homes, critical infrastructure, commercial assets and entire communities.
61. For this reason, I consider it appropriate that every new habitable building across all management areas of Lake A Zone be required to provide a water supply adequate for firefighting purposes in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.
62. Further, I consider that SNZ PAS 4509:2008 provides enough flexibility in its implementation to avoid being overly onerous for landowners and developers. Fire and Emergency personnel can assist landowners in understanding whether for example, the lake in which they are located adjacent can be relied on as a reliable water source and achieve compliance with SNZ PAS 4509:2008.

RELIEF SOUGHT

63. The relief sought by Fire and Emergency is set out in **Attachment 2**. In summary, Fire and Emergency requests the following relief:

- **NH-P5** – Delete words: “for activities in more densely populated zones and papakāinga”.
- **SUB-P16** – Delete words: “in the more densely populated zones”.
- **SUB-S9** – Delete words: “Rural 1 Zone, Conservation (Reserve 1) Zone and”
- **RURZ-S5A** – Amend: the Rules for Activities in Rural Zones to apply this performance standard to all new buildings across Rural 1 Zone, Rural 2 Zone and Rural 3 Zone, and that failure to comply with this performance standard should result in a restricted discretionary activity status, with a matter of discretion being, “the extent of consistency with the requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008” or to similar effect.
- **Rule 34.1.1(2)** – Delete words: “Settlement Management Area and Bush Settlement Management Area:”.

64. Overall, I consider that the above amendments will:

- better enable Fire and Emergency to achieve its statutory obligations under the Fire and Emergency New Zealand Act 2017, and
- better achieve the purpose of the RMA by enabling people and communities to provide for their health, safety and well-being by managing a potential adverse effect of relatively low probability but high consequence.



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Alec Duncan – Senior Planner

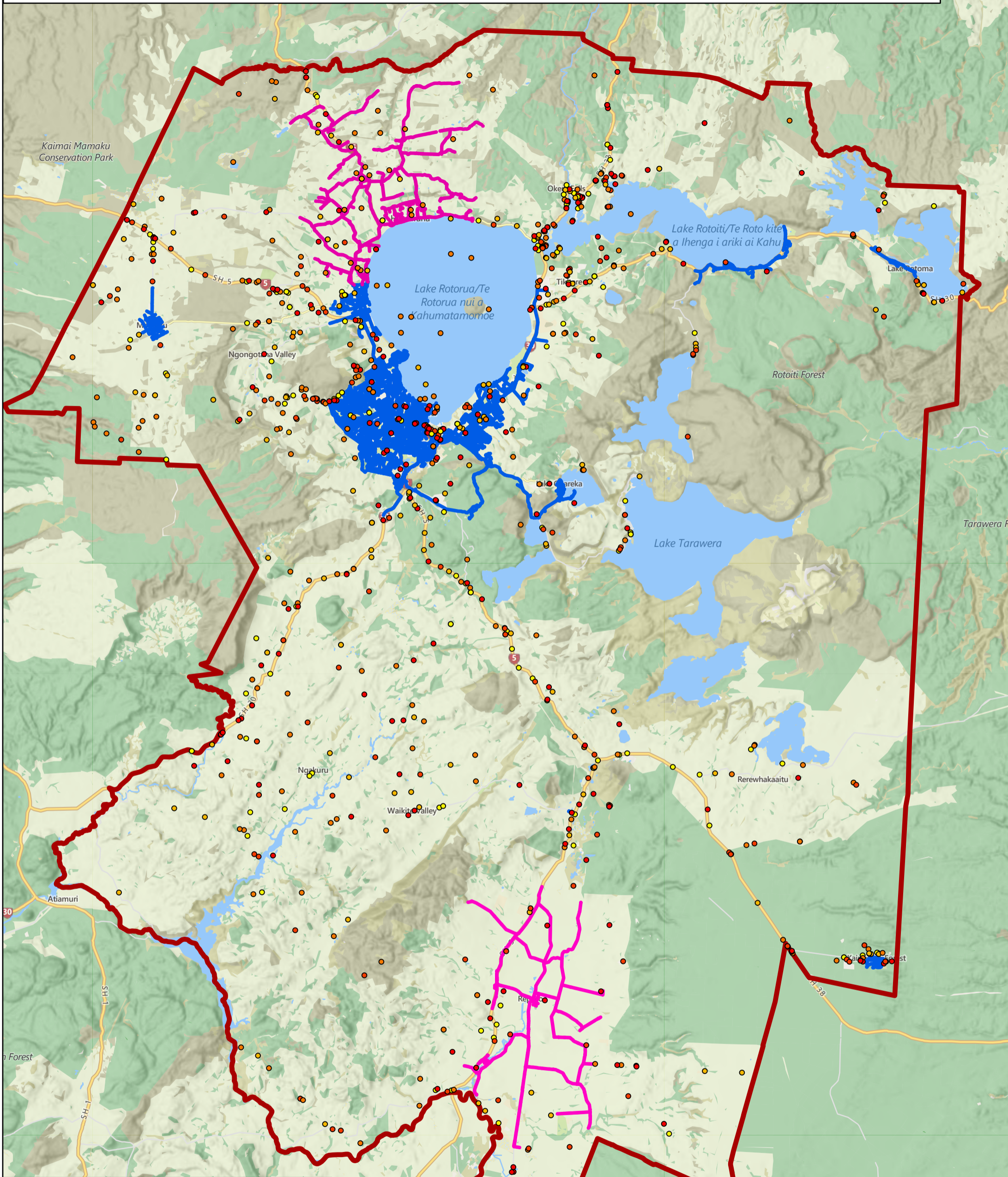
Beca Limited

On behalf of Fire and Emergency
New Zealand

Attachment 1: Maps of Rotorua District

- Ten year Incidents outside of Reticulated Water supply
- Wildfire High Risk Communities and Volatile Fuel
- Two Tanker Resource Drive time

Rotorua District - Ten year Incidents outside of Reticulated Water supply



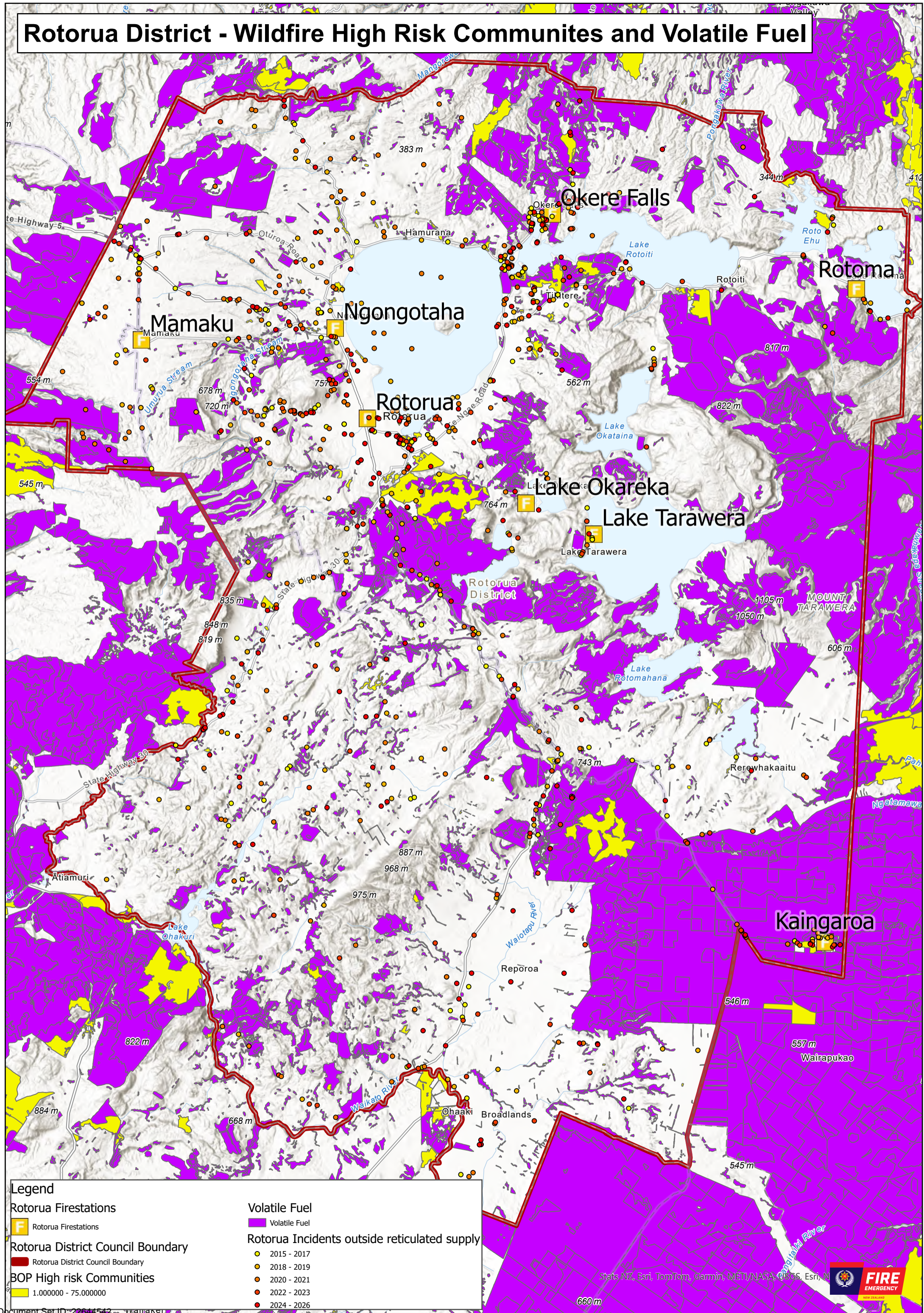
Legend

Rotorua Incidents outside reticulated supply

- 2015 - 2017
- 2018 - 2019
- 2020 - 2021
- 2022 - 2023
- 2024 - 2026
- Reporoa Questionable Reticulation
- Hamurana Questionable Reticulation
- 100m proximity of Reticulated service
- Rotorua District Council Boundary



Rotorua District - Wildfire High Risk Communities and Volatile Fuel



Legend

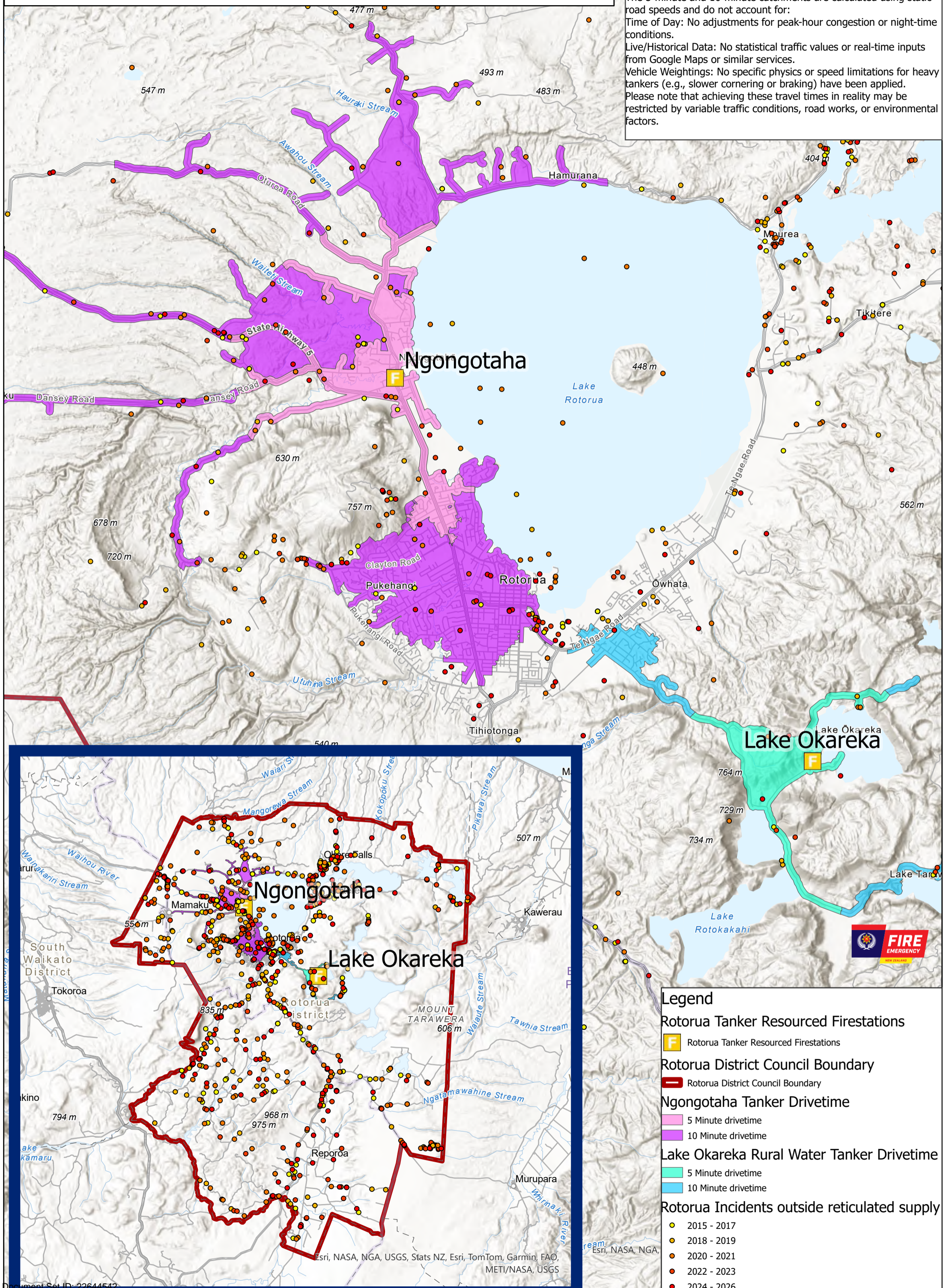
Rotorua Firestations	Volatile Fuel
Rotorua Firestations	Volatile Fuel
Rotorua District Council Boundary	Rotorua Incidents outside reticulated supply
Rotorua District Council Boundary	2015 - 2017
BOP High risk Communities	2018 - 2019
1.000000 - 75.000000	2020 - 2021
	2022 - 2023
	2024 - 2026

Rotorua District - Two Tanker Resource Drive time

This map's Tanker Drivetime analysis is based on the 57.0 Road Network Dataset. The 5-minute and 10-minute catchments are calculated using static road speeds and do not account for:

- Time of Day: No adjustments for peak-hour congestion or night-time conditions.
- Live/Historical Data: No statistical traffic values or real-time inputs from Google Maps or similar services.
- Vehicle Weightings: No specific physics or speed limitations for heavy tankers (e.g., slower cornering or braking) have been applied.

Please note that achieving these travel times in reality may be restricted by variable traffic conditions, road works, or environmental factors.



Attachment 2: Proposed Plan Change 8 – Relief sought

Underlining indicates text proposed to be added and ~~striking~~ indicates text proposed to be deleted, in the PPC8 version notified for submissions.

Underlining indicates text recommended to be added and ~~striking~~ indicates text recommended to be deleted in the Section 42A Report.

Underlining indicates text requested to be added and ~~striking~~ indicates text requested to be deleted.

Wildfire

NH-P5 ~~Mitigate the risks of wildfire associated with land use and subdivision and development by:~~

- ~~1. Requiring firefighting water supply for activities in more densely populated zones and papakāinga to reduce the risk of wildfire occurring.~~
- ~~2. Encouraging subdivision design in rural areas and at the rural-urban fringe to consider the potential risks of wildfire and, where appropriate, include measures that may help reduce the risks. Such measures may include:
 - ~~a. identifying suitable locations for building platforms and accessways that reduce exposure to wildfire hazards and facilitate egress;~~
 - ~~b. facilitating access for emergency services; and~~
 - ~~c. choice and location of plant species in relation to buildings and accessways to reduce the risk of fire spread.~~~~

SUB-P16

Ensure applications for subdivisions demonstrate that the water supply capacity, ~~including capacity for firefighting purposes,~~ is sufficient and reliable for the development, ~~and includes capacity for firefighting purposes all year round in~~ the more densely populated zones.

SUB-S9 Site serviceability

b. Water services

- a. All existing available water services shall be extended wherever practically possible. Council will consider the capacity of the existing utility service to connect to each new site within the subdivision, to service future land use in the catchment, and the adequacy of the existing utility services available, including potential to upgrade such services to ensure adequate capacity;
- b. New water services shall be provided for within road reserves;

- c. Unless otherwise provided for by this plan, all services are expected to be entirely underground;
- d. The services to each site shall be independent from the point of supply and to the point of discharge;
- e. All existing water services serving the sites in the subdivision and that are located on adjacent sites must be identified, including all existing and proposed easements associated with the provision of water services; and
- f. The water supply shall be adequate for fire-fighting purposes, except in the Rural 1 Zone, Conservation Zone and Water Zone.

Not shown in full track changed - comprehensive change to Rural Zones chapter rule framework required to:

- **Amend** the Rules for Activities in Rural Zones to apply RURZ-S5A performance standard to all new buildings across Rural 1 Zone, Rural 2 Zone and Rural 3 Zone, and that failure to comply with this performance standard should result in a restricted discretionary activity status, with a matter of discretion being, “the extent of consistency with the requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008” or to similar effect.

34.0 POTABLE WATER SUPPLY

MANAGEMENT AREA: ALL MANAGEMENT AREAS

34.1 PERMITTED ACTIVITIES

34.1.1 Water supply systems complying with the following conditions:

...

2. ~~Settlement Management Area and Bush Settlement Management Area: Every habitable building shall be provided with a water supply adequate for firefighting purposes~~ with a water supply adequate for firefighting purposes in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008

...

34.1.2 Operational private or public community water supply systems complying with the following conditions:

~~1. The water supply system has capacity for fire protection purposes in accordance with the Fire Service Code of Practice within any Gazetted Fire District; and~~

...