

To: The Expert Panel, Environmental Protection Authority

8 October 2026

From: Fire and Emergency New Zealand

Regarding fast track project: Ōhoka Residential Subdivision

Fast-track reference: FTA231

FIRE AND EMERGENCY NEW ZEALAND COMMENTS ON THE ŌHOKA RESIDENTIAL SUBDIVISION SUBSTANTIVE APPLICATION

1 Introduction

- 1.1 Fire and Emergency New Zealand (**Fire and Emergency**) appreciates the opportunity provided by the Expert Panel (**Panel**) to comment on the Ōhoka Residential Subdivision substantive application (**Application**).
- 1.2 Fire and Emergency provides these comments in with the context of its statutory responsibilities under the Fire and Emergency New Zealand Act 2017. Fire and Emergency's functions include promoting fire safety, protecting life and property from fire and other emergencies, and ensuring communities can be effectively serviced by emergency response infrastructure.
- 1.3 These comments focus on matters relevant to Fire and Emergency's operational requirements, namely:
 - a. firefighting water supply;
 - b. emergency vehicle access;
 - c. rights-of-way and rear access arrangements; and
 - d. appliance manoeuvrability and operational access.
- 1.4 These comments are based on the Application and supporting technical information provided to the Panel.

2 Application summary relevant to Fire and Emergency functions

- 2.1 Carter Group Limited (**Applicant**) has lodged the Application with the Environmental Protection Authority under the FTAA.
- 2.2 The Application seeks:
 - a. an approval described in section 42(4)(a) of the FTAA for resource consents that would otherwise be sought under the Resource Management Act 1991;
 - b. an approval described in section 42(4)(h) of the FTAA for a wildlife approval; and
 - c. an approval described in section 42(4)(i) of the FTAA for an archaeological authority.
- 2.3 Fire and Emergency's comments relate principally to the subdivision and land use resource consents sought under section 42(4)(a) of the FTAA.

- 2.4 The Application seeks approval to subdivide and develop approximately 154 hectares of rural-zoned land at:
- a. 531 and 535 Mill Road;
 - b. 325 and 347 Whites Road; and
 - c. 236 Bradleys Road, Ōhoka.
- 2.5 The site adjoins the existing Ōhoka settlement in the Waimakariri District.
- 2.6 The proposal would provide for:
- a. approximately 856 residential allotments of varying sizes;
 - b. a retirement village;
 - c. a local centre providing day-to-day goods and services;
 - d. a polo ground and associated facilities;
 - e. supporting access lots; and
 - f. land to vest for roads, reserves and utility purposes.
- 2.7 The development will require reliable firefighting water supply infrastructure and adequate access for emergency responders.
- 2.8 Fire and Emergency notes that the Application documents refer to different residential yields. The Assessment of Environmental Effects and Infrastructure Assessment refer to 879 residential allotments, while the updated Water Supply Strategy and supplementary water supply memorandum refer to approximately 856 residential allotments.
- 2.9 Fire and Emergency consider the detailed firefighting water supply design and supporting hydraulic assessment should therefore be based on the number and type of allotments authorised within each relevant subdivision stage.
- 2.10 The development is proposed to occur in stages. Potable water is proposed to be supplied through the existing Ōhoka water supply for Stage 1 and a new reticulated community water supply for the remainder of the development.
- 2.11 The new community supply is expected to draw from approximately four or five new groundwater bores and be pressurised using pumps located at the proposed treatment facility. The updated Water Supply Strategy states that the first new bore is proposed to be established during the construction of Stage 1, although it would be located within the Stage 2 area.

3 Firefighting water supply

- 3.1 Fire and Emergency has reviewed the Infrastructure Assessment, Water Supply Strategy and supplementary information provided in support of the Application.
- 3.2 The Infrastructure Assessment identifies that residential development within the subdivision will generally require a minimum FW2 firefighting water supply classification under Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (**the Code**). The assessment states that the proposed community water supply network can be designed to accommodate firefighting demand and achieve compliance with the Code.
- 3.3 Fire and Emergency acknowledges that the technical assessments indicate that a compliant firefighting water supply may be achievable. However, the information provided does not currently demonstrate that a minimum FW2 firefighting water supply will be available to all residential allotments throughout all stages of development.

- 3.4 Fire and Emergency has a particular concern in relation to Stage 1 of the development. The Application states that Stage 1 residential allotments will be serviced by the existing Ōhoka water supply network while the new community water supply network is progressively established.
- 3.5 The Application does not include detailed hydraulic modelling, confirmed watermain sizing, demonstrated firefighting flows, residual pressure calculations, hydrant coverage assessments, or evidence that the existing Ōhoka water supply network can achieve the minimum FW2 firefighting water supply required for residential development.
- 3.6 The Water Supply Strategy also indicates that firefighting water supply compliance will be assessed at building consent stage and that responsibility for compliance will rest with future property owners.
- 3.7 Fire and Emergency does not consider at the building consent process will provide sufficient certainty the adequate firefighting water supply will be provided. This fundamental infrastructure servicing issue is not regulated by the building consent process.
- 3.8 Unlike a rezoning proposal, the Application seeks approval for subdivision and associated development. The reticulated network, storage, pumps, and hydrants should therefore be designed and established through the subdivision, with each relevant title subject to a consent notice requiring ongoing compliance with SNZ PAS 4509:2008. Fire and Emergency considers that this approach is necessary because the Application does not currently provide sufficient certainty that an FW2 firefighting water supply will be available to every residential allotment throughout each stage of development.
- 3.9 To address this, Fire and Emergency requests that a legal requirement to provide firefighting water supply, and access to it, for each new lot in secured through a consent notice.

4 Emergency vehicle access

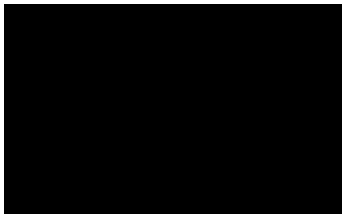
- 4.1 Fire and Emergency has reviewed the proposed road hierarchy, subdivision layout and access arrangements.
- 4.2 The proposed public road network generally appears capable of accommodating emergency service vehicles. However, Fire and Emergency has concerns regarding a number of proposed rights-of-way (ROW) and rear access arrangements which are identified as having a formed width of approximately 3m.
- 4.3 Fire and Emergency generally requires a minimum clear carriageway width of 4m to accommodate emergency vehicles. While a reduction to 3.5m may be appropriate at certain entrance locations where turning movements are limited, a 3m access width does not generally provide sufficient width for Fire and Emergency appliances.
- 4.4 The Application does not demonstrate that all future dwellings served by ROWs and rear-access arrangements will either:
 - a. provide compliant emergency vehicle access; or
 - b. be located within a maximum hose-run distance of 75m from a fire appliance positioned on a public road.
- 4.5 As the final location and dimensions of future dwellings are not currently known, Fire and Emergency considers that emergency access outcomes should be secured through the subdivision approval framework rather than deferred entirely to future building consent process.
- 4.6 Fire and Emergency considers that each future dwelling served by a ROW or rear access arrangement should either be capable of direct emergency vehicle access or demonstrate compliance with the 75m maximum hose-run requirement.

- 4.7 Fire and Emergency considers a condition is necessary to ensure emergency access requirements can be achieved.
- 4.8 The proposal includes several cul-de-sac roads and associated turning facilities.
- 4.8 The supporting information states that these facilities have generally been designed in accordance with NZS 4404:2010. However, the Application does not include swept-path assessments to demonstrate that Fire and Emergency appliances will be able to safely manoeuvre within the proposed turnaround areas.
- 4.10 Fire and Emergency guidance requires dead-end roads to provide suitable turnaround facilities that allow appliances to complete turning movements without undertaking multiple-point manoeuvres during emergency response activities.
- 4.11 Operational requirements generally include:
- a. a minimum turning radius of 11.3m for pumping appliances;
 - b. a minimum turning radius of 12.5m where aerial appliances may be required; and
 - c. the ability to complete a full 360-degree turning movement within a 25m wall-to-wall turning circle.
- 4.12 The Application does not demonstrate that these requirements can be achieved.
- 4.13 Fire and Emergency therefore considers that further assessment is required to confirm that all cul-de-sac turning heads and turnaround facilities can safely accommodate Fire and Emergency vehicles and that providing adequate access be secured by conditions.

5 Conclusion and relief sought

- 5.1 Fire and Emergency acknowledges that the Application identifies a framework through which compliant firefighting water supply and emergency access arrangements could be achieved. However, the information currently available does not provide sufficient certainty that these outcomes will be delivered.
- 5.2 In particular:
- a. the Application does not demonstrate that an adequate firefighting water supply will be provided throughout all stages of development;
 - b. the servicing strategy for Stage 1 does not demonstrate compliance with FW2 firefighting water supply requirements;
 - c. the proposed rights-of-way and rear access arrangements do not demonstrate compliance with Fire and Emergency operational access requirements; and
 - d. appliance manoeuvrability within cul-de-sac turning facilities has not been demonstrated.
- 5.3 If the Panel decides to grant approval, Fire and Emergency requests that conditions be imposed as follows:
- a. Require the firefighting water supply infrastructure for each subdivision stage, including hydrant locations and spacing, to be designed and established to provide all residential lots with a minimum FW2 firefighting water supply in accordance with SNZ PAS 4509:2008. Before certification of the relevant subdivision stage (or equivalent approval under the FTAA), provide a detailed design and hydraulic assessment, based on the number and type of lots authorised in that stage, demonstrating the required flow, storage, hydrant coverage, and residual pressure at critical locations within the network. This requirement applies where the existing Ōhoka network is proposed to service Stage 1 residential lots;

- b. Require the subdivision water supply infrastructure to account for the anticipated water supply classifications and demands within each relevant stage. Any future building or activity requiring a classification higher than FW2 must demonstrate compliance with SNZ PAS 4509:2008 at the building consent stage, and the subdivision infrastructure must not preclude that compliance;
- c. Before certification of the relevant subdivision stage (or equivalent approval under the FTAA), register a consent notice on each relevant residential title requiring the allotment to be provided with, and maintain access to, a firefighting water supply that complies with SNZ PAS 4509:2008, except where those obligations are fully satisfied by public infrastructure vested in the Council;
- d. Require each ROW and rear dwelling site to provide emergency vehicle access meeting Fire and Emergency's operational requirements or ensure every future dwelling is within a maximum 75m hose run from a fire appliance positioned on the public road. Compliant access must provide a minimum clear carriageway width of 4.0m, which may reduce to 3.5m at an entrance where no tight turning manoeuvre is required, at least 4.0m of unobstructed vertical clearance, and a 4.0m clear working area around the fire appliance hardstand. Where compliance depends on the location or design of a future dwelling or an ongoing allotment-owner obligation, record those requirements in the consent notice registered under condition 5.3(c); and
- e. Before engineering approval for the relevant stage, provide swept-path analysis demonstrating that all cul-de-sacs and dead-end turnarounds enable the applicable Fire and Emergency appliance to complete a 360° turn without a multi-point manoeuvre. The analysis must demonstrate a minimum turning radius of 11.3m for pumping appliances and 12.5m where aerial appliance access is required, together with a 25m wall-to-wall turning circle. Incorporate any necessary design changes into the engineering plans.



Associate – Planning

Beca Limited

on behalf of

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