



44 Bowen Street  
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Wellington 6141  
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[www.nzta.govt.nz](http://www.nzta.govt.nz)

NZ Transport Agency Waka Kotahi Reference: 2026-0331

7<sup>th</sup> April 2026

Rangitikei District Council  
C/- Strategy Manager,  
Private Bag 1102  
Marton 4742

Via email: [districtplan@rangitikei.govt.nz](mailto:districtplan@rangitikei.govt.nz)

Dear Ms Gower,

**Submission on Proposed Plan Change 3 – Urban Growth**

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on the Plan Change 3 – Urban Growth.

Given the time pressures on the NZTA are present, we may provide additional information and evidence as a supplementary submission at a later date.

We welcome the opportunity to discuss the contents of our submission with Council Officers or the applicant as required.

If you have any questions, please contact me.

Yours sincerely

A handwritten signature in black ink that reads 'Elliott Thornton'.

Elliott Thornton  
Principal Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services

Email: [environmentalplanning@nzta.govt.nz](mailto:environmentalplanning@nzta.govt.nz)

**FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991**

**Submission on Proposed Plan Change 3 – Urban Growth – Marton, Bulls and Taihape**

**To:** Rangitīkei District Council  
C/- Strategy Manager,  
Private Bag 1102  
Marton 4742

Via email: [districtplan@rangitikei.govt.nz](mailto:districtplan@rangitikei.govt.nz)

**From:** NZ Transport Agency Waka Kotahi  
44 Bowen Street,  
Private Bay 6995  
Wellington 6141

**1. This is a submission on an application by Rangitīkei District Council for Proposed Plan Change 3 Urban Growth including:**

- Introduction of a Residential Intensification Area covering residentially zoned land adjacent to the town centres of Marton, Bulls and Taihape;
- Rezoning land on the fringes of Marton and Bulls from General Rural Zone to General Residential Zone;
- Enabling up to 2 dwellings as a permitted activity on a Rural Lifestyle section less than 5,000m<sup>2</sup> provided wastewater can be sufficiently managed on-site or connected to the reticulated wastewater network, where previously only 1 dwelling was permitted.

This submission relates to the extent the provisions have the potential to compromise the New Zealand Transport Agency Waka Kotahi (NZTA) statutory obligations.

**2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.**

**3. Role of NZTA**

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

Within the 2024-27 National Land Transport Programme, NZTA has allocated investment in the Manawatū-Whanganui region to the improvement, operation and maintenance of State Highway network, including public transport investment, walking and cycling and transport planning. In addition, NZTA is the co-funder of the local roading network. NZTA is therefore a significant investor in the infrastructure required to achieve land use change and growth.

#### 4. State highway environment and context

State Highway 1 (SH1) is the longest and most significant road in New Zealand's road network, running the length of both the North and South Islands. It is an important link between our large cities, and regional centres, along with an important and vital freight route.

State Highway 3 (SH3) is an important national highway linking the west coast of the North Island from New Plymouth to Palmerston North via Whanganui.

##### Marton

SH1 runs approximately 500m east of the Marton township with key connections to SH1 via Calico Line and Makirikiri Road.

SH3 runs approximately 2km south of the Marton township with key connections via Pukepapa Road to the south, or Wanganui Road to the west.

Both roads provide important connections to other regional towns including Bulls to the south, Whanganui to the west, and Hunterville to the north.

##### Bulls

Both SH1 and SH3 run through the centre of Bulls which forms the junction between both state highways. They provide access to Ohakea RNZAF base to the south towards Wellington, Whanganui to the west, and Hunterville to the north.

##### Taihape

SH1 runs through the centre of Taihape, a popular stop for travellers between Ruapehu District and Bulls.

#### 5. The specific parts of the application that this submission relates to are:

- The effect of the urban intensification on traffic volumes on the State Highway network and the need for changes to accommodate additional traffic demand including but not limited to intersections and lane widening;
- The need to expand Rule TR-S6 in relation to any land rezoned or intensified with the potential for direct access to SH1 or SH3; and
- The need to expand Rule NOISE-R4 in relation to noise sensitive activities to include roads.

#### 6. The submission of NZTA is:

- (i) NZTA supports the need to accommodate urban growth in Marton, Bulls and Taihape, particularly as these areas well serviced and within close proximity to employment and amenities.
- (ii) NZTA are concerned that urban intensification may occur in advance of funding agreement needed to facilitate upgrades to numerous intersections as identified in the Integrated Transport Assessment carried out by Stantec dated February 2026.

There are no requirements in the plan in relation to staging or sequencing of the development to ensure any necessary upgrades are in place or financed, prior to development.

- (iii) NZTA are concerned that the urban intensification adjacent to the State Highway network could result in new road or access to the State Highway network, particularly around Bulls.



- (iv) NZTA are concerned that the urban intensification adjacent to the State Highway could give rise to increased reverse sensitivity and complaints in relation to road noise.

**NZTA seeks the following decision from the consent authority:**

- (i) NZTA seek more information on the effect, funding and timing of intersection upgrades and potential caps on development (i.e. new dwelling or lot numbers), dependant on delivery of any identified intersection upgrades.
- (ii) NZTA seek expansion to Rule TR-S6 to ensure that new development in Bulls, either through rezoning or Residential Intensification Area does not result in increased connections to SH1 or SH3 including new roads, or vehicle access (unless there is no alternative).
- (iii) NZTA seek expansion to Rule NOISE-R4 which currently addresses reverse sensitivity effects from rail, to include road noise, informed by a Noise Assessment prepared by a suitable qualified and experience professional.

7. **NZTA does wish to be heard in support of this submission.**
8. **If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.**
9. **NZTA is willing to work with the Council in advance of a hearing.**

Signature:

Principal Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date 7 April 2026

Address for service: NZ Transport Agency Waka Kotahi  
44 Bowen Street  
Private Bag 6995  
Wellington 6141

Contact Person: Elliott Thornton  
Telephone Number:  
Email: EnvironmentalPlanning@nzta.govt.nz

# Submission on Proposed Plan Change 3 – Bulls Growth Area

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## 1. Submitter Details

**Organisation:** G & C Holdings Ltd  
**Postal Address:** PO Box 70, Bulls 4863  
**Email Address:**  
**Phone Number:**

**Site:** 233A State Highway 1, Bulls (Legal Description Lot 2 DP 320208)

Please note:

1. We could not gain an advantage in trade competition through this submission.
2. We are directly affected by the Proposed Plan Change.

## 2. Plan Change Details

**Relevant District:** Rangitikei District Council  
**Plan Change Number:** Plan Change 3 – Bulls Growth Area

## 3. Submission Summary

This submission relates to land at 233A State Highway 1 in Bulls which we propose is rezoned residential. The Plan Change as currently drafted underestimates feasible growth capacity, particularly given accelerating demand linked to Ohakea and the strategic location of Bulls being a residential and farming hub in the central lower north island.

This site is uniquely positioned. It has access via State Highway 1 and potentially via Wilson Street with cooperation from the neighboring landowner (10 Wilson Street). The site has no flood risk compared to other areas being proposed for residential. The site is adjacent to existing residential development.

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G & C Holdings Ltd – Plan Change 3 Submission  
c/o Phocus Planning Ltd  
236 Broadway Avenue  
Palmerston North  
[Phil@phocusplanning.co.nz](mailto:Phil@phocusplanning.co.nz)

If rezoning of the site is not included, these advantages will be lost, and the district risks inefficient and constrained growth.

We are not asking for speculative expansion, but for a logical, well-located extension that aligns with the intent of the Plan Change. Key reasons being:

- Access from State Highway 1.
- Potential secondary (and preferred) connection to Wilson Street which will provide a key connectivity benefit.
- Potential for an internal loop road with connected residential streets
- A walkable link to the nearby school
- A stormwater neutral site in a low-lying area.
- Estimated yield: 35–45 residential lots.

#### 4. Specific Submission Points & Relief Sought

Relief Sought: Rezone the rear rural portion of the site to Residential (see Figure 2 below).



Figure 1: The site

G & C Holdings Ltd – Plan Change 3 Submission  
 c/o Phocus Planning Ltd  
 236 Broadway Avenue  
 Palmerston North  
[Phil@phocusplanning.co.nz](mailto:Phil@phocusplanning.co.nz)

9 April 2026



**Figure 2:** Proposed rezoning to residential (yellow highlighted area)

## 5. General Comments

The site is a logical and appropriate location for urban expansion. It adjoins the existing urban edge of Bulls, has strong transport connections, and is not susceptible to flooding.

The requested inclusion of this site is consistent with:

- Section 5 RMA – sustainable management
- Section 31 RMA – integrated land use
- Section 32 RMA – most appropriate option

### Highly productive land

There is demand for urban growth in the District and rezoning the rear portion of the site residential is justified to meet RDC's housing obligations and will not be inconsistent with the NPS-HPL.

### Infrastructure constraints

The site has superior access and staging ability compared to other sites identified in Plan Change 3.

## **6. Relief Sought**

We request Council amend the Plan Change to include the rear section of 233A State Highway 1, Bulls (Legal Description Lot 2 DP 320208) as residential.

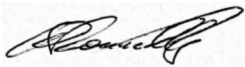
## **7. Decision Sought**

We respectfully request that the rear portion of the site be rezoned for residential purposes.

## **8. Hearing Attendance**

We wish to be heard in support of our submission.

We would consider presenting a joint case with other parties if they seek similar relief.



Craig Connelly

9<sup>th</sup> April 2026

## RANGITĪKEI DISTRICT COUNCIL

## Proposed Plan Change 3 - Urban Growth

## Submission Form

Rangitikei District Plan (2013)

Resource Management Act 1991 - FORM 5 of the Resource Management (Forms, Fees and Procedure) Regulations 2003

## Submissions can be:

**Delivered to:** Rangitikei District Council's head office: 46 High Street, Marton**Posted to:** Rangitikei District Council, Attn: Strategy Manager, Private Bag 1102, Marton 4741**Emailed to:** districtplan@rangitikei.govt.nz**Submissions must be received no later than 5pm on Monday, 13 April 2026.***Note: You must fill in all sections of this form.*

Submitter Contact Details	
Full name:	Hilary Powell
Organisation (if on behalf of an organisation):	
Postal address for service:	
Telephone/mobile number:	
Email address for service:	powellhilary5@gmail.com

Trade Competition	Select one:
I could gain an advantage in trade competition through this submission.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
I am directly affected by an effect of the subject matter of the submission that - a. adversely affects the environment; and b. does not relate to trade competition or the effects of trade competition. <i>Please note that if you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 of Schedule 1 of the Resource Management Act 1991.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

The specific provisions of the proposed plan change that my submission relates to are: (Please specify/list the objective, policy, rule or zoning matter your submission relates to)
notification of Proposed Plan Change 3 - Urban growth Residential Intensification Area for Marton

**My/our submission is that:**

(Clearly state whether you SUPPORT or OPPOSE specific provisions of the proposed plan change AND give reasons for your views)



Oppose due to concerning re. existing infrastructure for sewage and stormwater issues. We have had and neighbour issues with blocked sewage pipes as old and need replacing. These include council pipes from road, old and needing replacing now.  
 Flooding. We already have fastflow pump system in place for back lawn to assist, but still have issues especially front lawn with flooding. Sections don't currently cope with storm water how will cope with more intense residential change. Stress then on stormwater drains moved to this area due to large section so can be independent with parking does at black road, grow own vegetables fruit. Quiet community. This will change the whole dynamics of this community cause strain on existing health services in area, volunteer services and roads.

**I/we seek the following decision from Rangitikei District Council:**

(Give details and reasons why e.g. if you are seeking amendments outline these clearly)



Request council to review decision to change zone from 400 sqm to 250 sqm per lot to remain at 400 sqm. This still gives option to build more than one residence on each property.  
 Council need to ensure current infrastructure can cope with even this increase in population. Need to upgrade old existing pipes / drainage first.  
 If most properties are occupied by 1-2 tenants, need to clarify whether existing zone of 400 sqm is going to be viable first using current infrastructure and the need to upgrade systems to cope with this ~~up to~~ existing population for the

Proposed Plan Change Hearing	Select one:
I wish to be heard in support of my submission.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you would like to speak to your submission at a Hearing, would you like to make your verbal submission in Te Reo Māori?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

I have attached \_\_\_\_\_ additional pages to this submission.



Signature of submitter:         *Bowell*         Date:         3/4/26        

(or person authorised to sign on behalf of submitter)

In signing this document, I confirm that I have read the Privacy Statement below.

**PLEASE READ:**

**IMPORTANT Privacy Statement – Privacy Act 2020:**

Submissions are public information. The information on this form including your name, address for service and submission will be accessible to the public as part of the decision making process. Council is required to have this by the Resource Management Act 1991. The information will be held by Rangitikei District Council and may be shared with other individuals and Agencies for the purposes of the plan change process. By signing and submitting this form, you confirm that you agree with this Privacy Statement. You have rights to access the information and request its correction.

Please include more pages if required.

## RANGITĪKEI DISTRICT COUNCIL

## Proposed Plan Change 3 - Urban Growth

## Submission Form

Rangitīkei District Plan (2013)

Resource Management Act 1991 - FORM 5 of the Resource Management (Forms, Fees and Procedure) Regulations 2003

## Submissions can be:

**Delivered to:** Rangitīkei District Council's head office: 46 High Street, Marton**Posted to:** Rangitīkei District Council, Attn: Strategy Manager, Private Bag 1102, Marton 4741**Emailed to:** districtplan@rangitikei.govt.nz**Submissions must be received no later than 5pm on Monday, 13 April 2026.**

Note: You must fill in all sections of this form.

Submitter Contact Details	
Full name:	Neil Thomas Olfrey
Organisation (if on behalf of an organisation):	
Postal address for service:	
Telephone/mobile number:	
Email address for service:	hatfieldhuxley@gmail.com

Trade Competition	Select one:
I could gain an advantage in trade competition through this submission.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
I am directly affected by an effect of the subject matter of the submission that - a. adversely affects the environment; and b. does not relate to trade competition or the effects of trade competition. Please note that if you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 of Schedule 1 of the Resource Management Act 1991.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

The specific provisions of the proposed plan change that my submission relates to are: (Please specify/list the objective, policy, rule or zoning matter your submission relates to)
Rezoning my property, and the neighbours. While generally in favour. I have reservations regarding (1) Section size. Wangarei Road is Marton's premier entrance and as such, quality section size means quality homes. 500 m <sup>2</sup> as a minimum will support this.

**My/our submission is that:**

(Clearly state whether you SUPPORT or OPPOSE specific provisions of the proposed plan change AND give reasons for your views)



Broadly yes, as progress will support business, the primary employer in Maston being education.

**I/we seek the following decision from Rangitikei District Council:**

(Give details and reasons why e.g. if you are seeking amendments outline these clearly)



- My concerns, are (1) storm water - currently have a retention dam, and a water course that will require remedy.
- (2) Services, who pays for up grading of sewerage, water, etc.
  - (3) Section size, & profile for town.
  - (4) The change to the local business area economics.
  - (5) Rates are already a major concern. Any development must be staged, and rates in proposed residential area stay same.

Proposed Plan Change Hearing	Select one:
I wish to be heard in support of my submission.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If you would like to speak to your submission at a Hearing, would you like to make your verbal submission in Te Reo Māori?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

I have attached \_\_\_\_\_ additional pages to this submission.



Signature of submitter: *Neil Oulfin* Date: 12/04/26  
 (or person authorised to sign on behalf of submitter)

In signing this document, I confirm that I have read the Privacy Statement below.

**PLEASE READ:**

**IMPORTANT Privacy Statement – Privacy Act 2020:**

Submissions are public information. The information on this form including your name, address for service and submission will be accessible to the public as part of the decision making process. Council is required to have this by the Resource Management Act 1991. The information will be held by Rangitikei District Council and may be shared with other individuals and Agencies for the purposes of the plan change process. By signing and submitting this form, you confirm that you agree with this Privacy Statement. You have rights to access the information and request its correction.

Please include more pages if required.

New Adfield 9/24/26

New Adfield SUB No. 14

(1) Storm Water.

There are two significant factors

(a) the Horizons Retention Dam. Usually fills once a year, used the spill way three times in 8 yrs. I have been here.

(b) Depression in front paddocks (Rangitikei Developments) collects, and flows into a watercourse. In major weather events (more than 50mm/12 hrs) this floods in front of the winery building, and across the road. It flows behind the houses on Wanganui Road, before being piped under the road, through Suleywards Close.

(2) The recent, within the last decade upgrade of services in Wanganui Road, I assume will require further upgrade, to take stormwater, sewerage, and water. Is this cost borne by the developer, or the district, and at what ratio.

(3) Section size. The current minimum section size of 400 m<sup>2</sup> is not in keeping with the current housing design. Martin's premier entrance to the township must have this "sell" as a condition, to maintain existing ambience. The discovery of a fault line

3 (cont.)

fault line should require a minimum access of 3 mtrs on one side of any dwelling to allow emergency services access for their well being. I note the 1.5m boundary space from dwelling to boundary in Hereford Heights, I suggest would require access on the far side of a neighbours home, to extinguish a fire, by the brigade.

(4) There is going to be a significant shift of wealth to up above the wanganui railway branch line, therefore also a change in business areas. What provisions are there for this in the town plan.

(5) Rates. I believe a staged development would be the "best outcome". If in fact the proposal is adopted then, over a period, sections could be released for development. Until then the current rural rating should remain until new titles are issued as dwellings, or infrastructure are built.

(6) Recreation areas. Is there any provision for parks, or walk areas for proposed increase of 9000 citizens.

9/24/26

Neil Jeffery (2)

## Form 5

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

**To:** Rangitikei District Council

**Submission on:** Plan Change 3 – Urban Growth

**Name of Submitter:** Fire and Emergency New Zealand

This is a submission on behalf of Fire and Emergency New Zealand (**Fire and Emergency**) on notified Plan Change 3 (**PC3**) to the Rangitikei District Plan (**RDP**).

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

The specific topics that Fire and Emergency's submission relates to are the provision of firefighting water supply and emergency vehicle access.

#### Fire and Emergency's submission is:

In achieving the sustainable management of natural and physical resources under the Resource Management Act 1991 (**RMA**), decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of the RDP to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

#### Firefighting water supply

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. To achieve this objective, Fire and Emergency requires adequate water supply be available for firefighting activities.

It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development being occupied, and that this water supply has adequate capacity and pressure available to service the future growth. Fire appliances carry a limited amount of water. Therefore, it is necessary that adequate water capacity and pressure be available to Fire and Emergency to control or extinguish a fire. In the urban areas of the district, firefighting water is sourced from the reticulated water supply network. However where reticulation is not available or limited (i.e. insufficient pressures and/or capacity), alternative firefighting water sources will be required. This may be in the form of dedicated water tanks for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

Adequate capacity and pressure for each development can be determined through New Zealand Fire Service Firefighting Water Supplies Code of Practice (**SNZ PAS 4509:2008**). SNZ PAS 4509:2008 is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water supply and access for Fire and Emergency to operate effectively and efficiently in an emergency.

Fire and Emergency considers it essential that development does not occur out of sequence with the delivery of key strategic infrastructure (network extensions or upgrades), or that development is enabled where there is

potential or known infrastructure capacity constraints in relation to the water supply network (unless the urban development itself includes necessary upgrades).

PC3 is supported by a Three Waters Growth Assessment, which includes water supply modelling. The Assessment considers firefighting water supply demand based on growth projections. The assessment concludes that there will be a requirement to carry out water supply upgrades regardless of growth to meet potable and firefighting water demands. It is acknowledged that the new General Residential Zone (**GRZ**) policies proposed as part of PC3 seek to ensure that development is only enabled where sufficient infrastructure capacity has been confirmed. PC3 does not propose any associated rule or performance standard, either within the GRZ or Subdivision Chapters, which explicitly requires an adequate firefighting water supply to be delivered as part of any future residential land use or subdivision consent process.

Whilst it is noted that Rangitikei District Council's (**RDC**) *Subdivision and Land Development Code of Practice* (**COP**) requires new water supply connections to comply with SNZ PAS 4509:2008, neither under the operative RDP or the proposed PC3 provisions does there appear to be any clear or enforceable connection between the RDP and the COP. It is also unclear whether this requirement applies to both subdivision and land-use development. This is particularly critical given the scale of infill development that would be enabled by PC3, given such development is less likely to occur part of a broader subdivision process.

Relief is therefore sought to ensure that the full extent of residential intensification enabled by PC3 requires applicants to demonstrate that all development can be serviced by an adequate firefighting water supply, consistent with SNZ PAS 4509:2008.

### **Emergency vehicle access**

Adequate access to both the source of a fire and a firefighting water supply is also essential to the efficient and effective operation of Fire and Emergency. For Fire and Emergency vehicles to access an emergency, adequate roading and accessway design is necessary to support the operational requirements of Fire and Emergency. The requirements for firefighting access are set out in SNZ PAS 4509:2008 and further detailed in Fire and Emergency's 'Emergency Vehicle Access Guidelines F5-02 GD' (December 2021) (**F5-02 GD**). The key elements are:

- To accommodate a Fire and Emergency vehicle, carriageways should have a minimum width of 4.0m. This can be reduced to a minimum width of 3.5m at entrances, provided tight turns are not required.
- Fire and Emergency needs vehicle access routes to have an unobstructed clearance height of at least 4.0m so that vehicles can pass through openings. This includes clearance from buildings, archways, gateways/doorways and overhanging structures (e.g. ducts, pipes, sprinklers, walkways, signs, structural beams, trees, hanging cables, etc.).
- Any carriageway with a dead end needs a turnaround area so that Fire and Emergency vehicles do not need to do multi-point turns to turn around. This is so Fire and Emergency personnel can move their vehicles quickly in an emergency to protect them. Fire and Emergency vehicles need to be able to turn a full 360° within a 25m circle (wall-to-wall clearance) to meet Waka Kotahi NZ Transport Agency requirements. The minimum turning radius of turnaround areas should be no less than 11.3m for pumping vehicles and 12.5m for aerial fire appliances.
- The maximum negotiable gradient is 1:5, but in general the roading gradient should not exceed 16%.

To support effective and efficient access and manoeuvring of crew and equipment onsite for firefighting, medical, rescue and other emergency response within developments (and particularly where no vehicle access is provided), Fire and Emergency seeks:

- pedestrian accessways are designed to be clear and unobstructed,
- pedestrian accessways have a minimum width of 3m on a straight accessway,
- wayfinding for properties in a development is clear (including at night),

- to provide for sufficient and effective hose run, the accessway must be no more than 75m in length from a connecting road with a fully reticulated water supply including hydrants. This measurement shall be taken from the road boundary to the furthest point of any proposed building platform on the site, and
- developments give effect to the guidance provided in SNZ PAS 4509:2008 and F5-02 GD.

It is noted that all subdivisions and land use activities under the RDP must meet RDC's Minimum Road Design Standards, as set out in Table 1 of the RDC *Subdivision and Land Development Code of Practice*. For urban scenarios, these standards generally appear to provide for Fire and Emergency's operational requirements in terms of road width and gradient. However, there is no restriction on the maximum length of private rights of way (ROW). It is also noted that all roads or ROWs serving four dwelling units or less are required to provide a minimum carriageway width of 3.0m with no restriction on ROW length. These standards have the potential to result in the formation of new lots and dwellings which are located in areas which are inaccessible to appliances and also have the potential to exceed maximum hose run distances from a connecting public road. There do not appear to be any provisions within the RDP or RDC *Code of Practice* which make any explicit reference to road designs providing for emergency access.

**Fire and Emergency seeks the following decision from the local authority:**

Amendment of PC3 as set out in **Appendix A** to this submission, including any further or consequential relief that may be necessary to address the matters raised in this submission. Whilst Appendix A does not suggest any specific relief in relation to emergency access matters, Fire and Emergency would welcome the opportunity to discuss how PC3 can strengthen operative RDP access standards to provide for operational firefighting requirements.

Fire and Emergency wishes to be heard in support of its submission.

If others make a similar submission, Fire and Emergency would consider presenting a joint case with them at a hearing.



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

<b>Date:</b>	10/04/2026
<b>Electronic address for service of person making submission:</b>	Jennifer.beardsall@beca.com
<b>Telephone:</b>	
<b>Postal address:</b>	85 Molesworth Street, Wellington
<b>Contact person:</b>	Jennifer Beardsall

## Appendix A: Fire and Emergency New Zealand submission

The following table provides Fire and Emergency's submission and sets out the decisions sought by Fire and Emergency, including specific amendments to provisions of PC47. These amendments are shown in **red** (for new text sought) and ~~strike through~~ (for deletion).

ID	Provision	Position	Submission	Decision Sought
<b>Part 3 - Area Specific Matters</b>				
<b>Residential Zones – General Residential Zone</b>				
<b>GRZ Rules</b>				
2	<p><b>GRZ-R1 - Buildings, structures, and ancillary activities associated with any permitted activity</b></p> <p>1. <i>Activity status: Permitted</i></p> <p><i>Where:</i></p> <p>a. <i>All General Residential Zone Standards are complied with (refer to GRZ-S1 to GRZ-S7).</i></p> <p>b. <i>The ancillary activity is on the same site as the primary activity.</i></p> <p>2. <i>Activity status where compliance is not achieved: Restricted Discretionary</i></p> <p>3. <i>Matters over which discretion is restricted:</i></p> <p>a. <i>The matters of discretion associated with any performance standard which cannot be complied with.</i></p>	<p><b>Oppose</b></p>	<p>The RDP does not contain any explicit provisions requiring the provision of a firefighting water supply. Instead, it relies on the <i>RDC Subdivision and Land Development Code of Practice</i>, which sets out requirements for both urban and rural development.</p> <p>While the <i>Subdivision and Land Development Code of Practice</i> provides a framework for firefighting water supply, its effectiveness depends on how clearly it is linked to the RDP as a document that development within the GRZ must comply with.</p> <p>Under the proposed PC3 provisions, there is no clear or enforceable connection between the RDP and the <i>Subdivision and Land Development Code of Practice</i>.</p> <p>As a result, it cannot be relied upon to ensure that new residential buildings within the GRZ are required to be serviced with a compliant firefighting water supply. This gap presents a risk to Fire and Emergency operations.</p> <p>Fire and Emergency has sought a new standard below and that GRZ-R1 be amended so that this new servicing standard applies to all new residential buildings in the GRZ.</p> <p>To align with the relief sought elsewhere, Fire and Emergency seek the inclusion of an additional matter of discretion that provides TDC the scope to consider the extent of non-compliance with the New Zealand Fire Service Firefighting</p>	<p>Amend as follows:</p> <p>1. <i>Activity status: Permitted</i></p> <p><i>Where:</i></p> <p>a. <i>All General Residential Zone Standards are complied with (refer to GRZ-S1 to GRZ-S7<del>8</del>).</i></p> <p>...</p>

ID	Provision	Position	Submission	Decision Sought
	<i>b. The effect of the particular noncompliance on the environment, including the cumulative or combined effect of non-compliances.</i>		Water Supplies Code of Practice SNZ PAS 4509:2008. Refer to the new performance standard proposed.	
<b>GRZ Standards</b>				
	<b>New standard</b>	<b>NEW</b>	For reasons set out in the submission above, Fire and Emergency seeks a new standard that requires all new residential buildings in the GRZ to be provided with an adequate firefighting water supply.	<p>Introduce a new standard as follows:</p> <p><b><u>GRZ-S8 - Servicing</u></b></p> <p><i>i. All new buildings must be provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</i></p> <p><i>Matters of discretion where this performance standard cannot be complied with:</i></p> <p><i>i. The suitability of the proposed water supply for firefighting purposes including effects on people's health and safety, and on property.</i></p> <p>Or to similar effect and any other consequential amendments required to give effect to the relief sought.</p>
<b>Part 2 – District Wide Matters</b>				
<b>SUB - Subdivision</b>				
	<p><b>SUB-P8</b></p> <p><i>Ensure that staging of development is efficient, consistent with, and supported by adequate infrastructure, and that development is deferred if the required upgrading of infrastructure has</i></p>	<b>Support</b>	Fire and Emergency supports Policy SUB-P8 in so far as it seeks to ensure that the the staging of development does not occur out of sequence with the delivery of necessary infrastructure extensions and/or upgrades).	Retain as notified.

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	<i>not occurred prior to, or will not occur in-line with, the development.</i>			
	<p><b>SUB-R1: Any subdivision of land, and all associated earthworks and construction in all zones...</b></p> <p>1. <i>Activity status: Restricted</i> <i>Discretionary Where: a. All relevant Subdivision Standards are complied with.</i></p> <p>2. <i>Matters over which discretion is restricted:</i> ..... <i>g. The extent to which there is capacity for connection to existing reticulated essential services and the sufficiency of the proposed water supply, sewage disposal and stormwater services.</i></p>	<b>Oppose</b>	<p>As per submission point ID#1, the RDP does not contain any explicit provisions requiring the provision of a firefighting water supply. Instead, it relies on the RDC <i>Subdivision and Land Development Code of Practice</i>, which sets out requirements for both urban and rural development.</p> <p>Under the proposed PC3 provisions, there is no clear or enforceable connection between the RDP and the <i>Subdivision and Land Development Code of Practice</i>.</p> <p>As a result, it cannot be relied upon to ensure that new residential subdivisions, enabled by PC3, are required to be serviced with a compliant firefighting water supply.</p> <p>Fire and Emergency has sought a new standard below and that SUB-S2 be amended so that this new servicing standard applies to all new residential subdivisions.</p> <p>To align with the relief sought elsewhere, Fire and Emergency seek the inclusion of an additional matter of discretion that provides TDC the scope to consider the extent of non-compliance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. Refer to the new performance standard proposed.</p>	<p>Amend as follows:</p> <p><b>SUB-R1: Any subdivision of land, and all associated earthworks and construction in all zones...</b></p> <p>1. <i>Activity status: Restricted</i> <i>Discretionary Where: a. All relevant Subdivision Standards are complied with.</i></p> <p>2. <i>Matters over which discretion is restricted:</i> ..... <i>g. The extent to which there is capacity for connection to existing reticulated essential services and the sufficiency of the proposed water supply (including firefighting water supply), sewage disposal and stormwater services.</i></p>
	<p><b>SUB-S2 Essential services</b></p> <p>1. <i>The development must provide the following connections for each allotment:</i></p>	<b>Oppose</b>	<p>For reasons set out in the submission above, Fire and Emergency seeks that the existing subdivision standard is amended to require all new residential lots enabled by PC3 to be provided with an adequate firefighting water supply. This standard is essential to give effect to Policy SUB-P8.</p>	<p>Amend as follows:</p> <p><b>SUB-S2 Essential services</b></p> <p>1. <i>The development must provide the following connections for each allotment:</i> <i>a. A potable water supply, including connection to a reticulated supply of potable</i></p>

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	<p><i>a. A potable water supply, including connection to a reticulated supply of potable water where this is available within 50 metres of the allotment.</i></p> <p>....</p>			<p><i>water where this is available within 50 metres of the allotment.</i></p> <p><i><u>aa. All new residential lots must be provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></i></p> <p>....</p>