

# Response ID ANON-D6BQ-CFWR-Y

Submitted to DZ PAS 4509 Firefighting Water Supplies – Code of Practice  
Submitted on 2026-04-29 16:28:43

## Introduction

### Information collection

Please confirm that you have read and agree to this privacy statement:

Yes :

Yes

### Your details

What is your name?

Name:

Chris Worth

What is your email address?

Email:

chris.worth@kapiticoast.govt.nz

What is your organisation?

Organisation:

Kapiti Coast District Council

Please confirm that you have read the information above.

Yes:

Yes

### Information on how to complete the form

#### Your feedback

##### Comment 1

Please select which section you are commenting on:

1. Introduction

Clause you are commenting on :

Foreword

Comment type:

General

Comment :

The Foreword notes that the Code is to be developed and published in accordance with section 73 of the Fire and Emergency New Zealand Act 2017. Subsection 2(b) states that FERNZ must develop the code in consultation with local authorities (and others). This draft Code is the vehicle for that consultation.

Council notes that, given the material's complexity and its implications for Council water services planning and operations, and for the cost of subdivision and development costs, allowing only one month for feedback suggests token engagement, not the 'partnership' described in the Foreword.

Proposed change:

That developing the Code in partnership with local authorities is meaningfully embraced and the consultation period is extended by at least three months to accommodate more meaningful engagement.

Would you like to submit another comment?

Yes

## Your feedback

### Comment 2

Please select which section you are commenting on:

1. Introduction

Clause you are commenting on :

Whole of document

Comment type:

General

Comment :

It is unclear what the expectation is for this document. The Fire and Emergency Act provides for it to be developed, (although to this level of detail is uncertain but gives it no legal status. It cannot be required or enforced through the Building Act and will need to be referenced in individual District Plans to carry any weight under the RMA for subdivision and development.

Its implementation would carry significant cost to councils and developers, and in the absence of any cost benefit analysis, the efficacy of its provisions to achieve the outcome desired is problematic.

Proposed change:

Withdrawal of the document until a rigorous cost benefit analysis has been undertaken, and adequate engagement has been carried out with councils, developers and government agencies (HUD, MBIE, Kainga Ora) and its impact on wider policy matters has been fully understood (ie on housing supply and affordability).

Would you like to submit another comment?

Yes

## Your feedback

### Comment 3

Please select which section you are commenting on:

1. Introduction

Clause you are commenting on :

1.1

Comment type:

General

Comment :

The purpose clause appropriately frames DZ PAS 4509:202X as national guidance for firefighting water supplies. However, the clause does not clearly acknowledge the continued role of territorial authorities in applying legally enforceable local engineering standards through district plans, infrastructure standards, and consent conditions. This omission may create uncertainty as to the legal status of the Code when applied alongside mandatory council frameworks.

Proposed change:

Amend Clause 1.1 to include a statement confirming that the Code is intended to complement, and not override, existing territorial authority regulatory and engineering requirements, including where councils apply more stringent standards.

Would you like to submit another comment?

Yes

## Your feedback

### Comment 4

Please select which section you are commenting on:

1. Introduction

Clause you are commenting on :

1.2

Comment type:

General

Comment :

The Code promotes a big change in the fire flow requirement which would result in Council having to spend a lot of money to upsize infrastructure when we are in a fiscally constrained environment.

Our understanding is that upsizing water mains to increase hydrant fire flow potential is one of the least cost-effective ways to reduce total property damage, has any costing been done on this?

Proposed change:

Provide some assessment of the value ratio between fire flow requirements and life and property safety outcomes.

Would you like to submit another comment?

Yes

Your feedback

Comment 5

Please select which section you are commenting on:

1. Introduction

Clause you are commenting on :

1.7

Comment type:

General

Comment :

The draft does not clearly explain how the Code should be used where councils already administer mandatory firefighting water standards, particularly those derived from SNZ PAS 4509:2008. This lack of clarity creates uncertainty for developers, consent authorities, and water suppliers when determining which framework takes precedence.

Proposed change:

Insert wording confirming that territorial authorities may adopt DZ PAS 4509:202X in whole or in part, including as an alternative acceptable means, and may continue to apply existing local standards where these remain operative.

Would you like to submit another comment?

Yes

Your feedback

Comment 6

Please select which section you are commenting on:

3. Planning stage

Clause you are commenting on :

3.6

Comment type:

Technical

Comment :

The enhanced requirements for hydrant identification, GIS accuracy, and status attributes are supported. However, immediate implementation may be challenging for councils with legacy asset systems.

Proposed change:

Add a phased implementation provision allowing councils to progressively align hydrant data systems without generating immediate non-compliance.

Would you like to submit another comment?

Yes

## Your feedback

### Comment 7

Please select which section you are commenting on:

APPENDIX A – Tables for classification, flowrates, and volume of firefighting water supply

Clause you are commenting on :

Table A2

Comment type:

Technical

Comment :

The new Code will create very large cost increases for developments in KCDC.

With intensification most properties will be below 400 m<sup>2</sup> so will need to have sprinkler systems as 60 l/s from a hydrant will be difficult to achieve (especially with retrofitting existing infrastructure in already established areas) and this is a large increase from the current 12.5 l/s requirement.

Proposed change:

Review practicality of these requirements for existing urbanized areas.

Would you like to submit another comment?

No