

28 April 2026

P4509 Firefighting water supplies Technical Advisory Group

Standards New Zealand

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Dear members of the Technical Advisory Group

### **Submission from the Manawatū District Council on DZ PAS 4509:202X Firefighting Water Supplies – Code of Practice**

The Manawatū District Council (MDC) thanks Standards New Zealand for the opportunity to provide feedback on DZ PAS 4509:202X – Firefighting Water Supplies – Code of Practice (the “draft COP”).

MDC generally supports the proposed Code of Practice as a necessary update to SNZ PAS 4509:2008 to reflect current legislation and Fire and Emergency New Zealand operational practice, and its role as a single framework applicable across both urban and rural contexts. MDC particularly supports the stronger planning focus of the draft and its recognition that firefighting water supply issues are best addressed early through subdivision, land use, and design processes. MDC also supports the Code’s move toward more risk-based hydrant testing and improved record-keeping expectations, while noting the need for these requirements to remain practical and proportionate for smaller councils.

However, MDC considers that the Code requires clearer direction on the treatment of legacy, constrained, and low-pressure water supply systems, and clearer distinction between the level of service reasonably expected from the public network and the mitigation that may be required for site-specific developments.

#### **Introduction**

Manawatū District Council provides drinking water services to a range of communities across the district through a mix of urban and rural reticulated schemes, alongside areas that rely on private or self-supplied water sources. Council-operated supplies service the main communities of Feilding, Himatangi Beach, Rongotea, Sanson/Ōhakea, Stanway-Halcombe, and Waituna West, each with differing source water characteristics, treatment processes, storage capacity, and levels of resilience. A significant proportion of the district’s rural population also relies on private supplies, including roof water and shallow bores, where levels of service, reliability, and water quality can vary.

Larger urban systems, such as Feilding, benefit from multiple sources, substantial storage, and on-demand reticulation networks. In contrast, smaller and rural schemes, including Sanson/Ōhakea, Stanway-Halcombe, and Waituna West, operate as restricted or constant flow systems that supply water to onsite storage tanks at individual properties. These systems are designed to provide a reliable potable water supply, rather than high instantaneous flows.

As a result, while most communities receive a sufficient and generally safe supply of drinking water, not all schemes are configured to provide firefighting water supply through the network. In particular, restricted and rural systems may be unlikely to meet firefighting water supply requirements without significant modification.

### **General Feedback**

While MDC supports the intent of the proposed Code of Practice (COP), we are concerned about potential implications for small and restricted water supply schemes such as Sanson and Ōhakea. MDC understands that the COP is expected to act as a benchmark for assessing the adequacy of firefighting water supply and could influence planning, consenting, and infrastructure decision-making over time. While non-mandatory, there is a risk the COP may be applied as a de facto standard through these processes.

MDC therefore requests that the Code be amended to clarify that it does not create an obligation on water service providers to upgrade existing public water supply networks where firefighting capacity was not part of the original network design. MDC further requests that the Code clearly confirm that compliance can be achieved through alternative site-level or non-reticulated solutions where network capacity is limited. This reflects the need to clearly distinguish between public network service obligations and development-specific mitigation, and to address these matters separately through planning and consenting processes.

MDC notes that, read together, the foreword and clause 1.2 may create uncertainty in practice. The foreword indicates that the Code is not intended to provide specifications for individual fire protection systems, while clause 1.2 places responsibility on the building owner where public supply is insufficient. MDC considers that the relationship between these statements, and the Code's intended use in planning and consenting frameworks, should be clarified.

It is also unclear how the COP is intended to be applied in practice alongside broader council decision-making processes, including consideration of cost, proportionality, and local context, particularly for small or rural schemes.

MDC also seeks clearer direction in the Code on the treatment of legacy or constrained water supply systems that do not meet all performance requirements, including minimum pressure. This should include how such constraints are to be identified, mapped, classified, disclosed, and managed through planning and consenting processes, LIMs, customer communication, and long-term asset planning.

Consideration should also be given to how such systems are described or classified, as broad categorisation as “non-compliant” may not accurately reflect operational capability and could create unintended consequences, including misinterpretation of

risk by property owners, insurers, and the wider community and reduced confidence in water services.

In particular, the Code should confirm that acknowledging an existing network constraint does not make that supply compliant, but instead provides a transparent basis for recording deficiencies, informing affected parties, managing risk, and prioritising upgrade or mitigation over time. The final Code should also provide practical guidance on how these supplies are to be managed without creating an unintended expectation that all existing networks must be upgraded to full Code performance. Clear direction on this issue is particularly important for smaller and mixed rural-urban districts, where historic infrastructure limitations may persist for some time.

MDC recommends supplementing the Code with additional guidance and worked examples that reflect a broader range of real-world scenarios, particularly those involving small, rural, or restricted water supply schemes.

This could include a simple and standardised set of minimum requirements for alternative firefighting water supplies, such as storage volume, fittings and couplings, signage, access, hardstands, refill arrangements, and ongoing maintenance responsibilities, to support consistent application and reduce interpretation disputes.

Expanding the examples to demonstrate how compliance can be achieved through a combination of reticulated and non-reticulated solutions, staged development, or site-specific mitigation measures would improve clarity and support more consistent application across different contexts. This could also include a concise implementation checklist or clear minimum information requirements for subdivision, resource consent, and building consent processes to support consistent application.

MDC supports the inclusion of flexible, site-specific solutions for achieving firefighting water supply outcomes, particularly in rural and non-reticulated areas. In many parts of the Manawatū District, practical approaches such as on-site storage tanks, shared community supply points, or other non-reticulated sources will be more feasible and proportionate than upgrading reticulated networks. The Code should more explicitly recognise and enable these approaches as valid means of achieving compliance, where they deliver an appropriate level of risk management.

MDC also considers it important that the Code more clearly acknowledges the need to balance firefighting water supply expectations with broader water service obligations, including the provision of safe drinking water and the management of emergency events such as drought or contamination. In practice, water service providers may be required to prioritise public health and continuity of supply, which can constrain the availability of water for firefighting purposes. Recognising these constraints would support a more realistic and integrated approach to water management.

Addressing these matters would improve the clarity and usability of the Code, particularly for councils managing diverse and resource-constrained water supply systems.

**Decisions sought:**

1. That the Code be amended to explicitly confirm that it does not create an obligation on water service providers to upgrade existing public water supply networks to meet firefighting requirements, and that compliance can be achieved through non-reticulated and site-level solutions where network capacity is limited.
2. That the Code provide clearer guidance that any solutions to firefighting water supply should be proportionate, taking into account cost, scale, and local context, particularly for small or rural communities.
3. That the Code be amended to include additional guidance and worked examples that reflect a wider range of real-world scenarios, including small, rural, and restricted water supply schemes.
4. That the Code be amended to include clear guidance on the treatment of legacy or constrained water supply systems that do not meet all performance requirements, including how such constraints are to be identified, recorded, disclosed, and managed through planning, consenting, and long-term asset planning processes, and to confirm that acknowledging a constraint does not make a supply compliant.
5. That the Code include practical implementation guidance, including minimum information requirements for subdivision, resource consent, and building consent processes.

MDC appreciates the opportunity to provide feedback and would welcome further engagement as the Code is finalised.

Yours sincerely



Shayne Harris  
**Chief Executive**