

**From:** Let's talk <notifications@engagementhq.com>

**Sent:** Thursday, June 8, 2023 4:38:19 PM

**To:** Rhiannon.Suter@icc.govt.nz <Rhiannon.Suter@icc.govt.nz>; hannah.kennedy@icc.govt.nz <hannah.kennedy@icc.govt.nz>

**Subject:** AnnabelS completed Make a submission

AnnabelS just submitted the survey Make a submission with the responses below.

**Full name:**

Annabel Small

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**Organisation:**

Absolute Land Ltd

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**City / town:**

Invercargill

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**Postcode:**

9812

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**Do you support the proposed changes to the Code of Practice for Subdivision, Land Use, and Development?**

Yes, but with amendments

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**What is your submission on the proposed Code of Practice?**

Code of Practice Submission [3.2.4.7](#) Power and telecommunications utilities should not be required to the boundary of every allotment. This should be a condition of building consent rather than part of the subdivision process so that requirements are tailored to the end product. For example, a large piece of land may be subdivided off as one lot, which is then further subdivided into smaller lots before any dwelling is constructed.

Telecommunications, in particular, should not be required as a condition of subdivision consent since there are many occasions in which only a copper connection is possible to the site. This may come at a high price and be virtually useless to the owner of the site. Mobile phones and satellite internet are good options which many people choose to use instead of a landline and physical connection.

3.2.5 – Datum and Coordinate System Both SDC and ICC should use NZVD 2016 as per a request from Land Information NZ that all Councils use NZVD 2016 as the vertical datum. The ICC Datum will be disappearing on the LINZ Geodetic Data Base.

Table 5.4 – Road Design A right of way for 7-12 should be added back into the table. Minimum formed carriageway of 5.5m width. Requiring a legal road for up to 12 lots will make development prohibitively expensive in many areas, and is not necessary when safe operation of the ROW can be achieved with sufficient formed width to allow vehicles to pass. More legal roads require more Council maintenance and rate-payer burden when a Right of Way is sufficient. In relation to Note 1 –urban rights of way should not be required to be hard surfaced for their full length. In many cases this is uneconomic, and unnecessary. In particular, this should not be a condition of consent for subdivision, as it is likely that trucks will need to be entering the site with building materials and could damage the seal. It is preferable that any sealing be done after buildings are constructed rather than before.

[3.2.20.9](#) Digital Plans The coordinate system should be NZTM 2000, which is used by most councils. Vertical Datum should be NZVD 2016 as indicated by LINZ to all councils. Council should develop and supply a standard plan format and example to supplied as a template.

Street Lighting: Note in relation to the bullet point regarding levels – All datums are mean sea level. NZTM would be consistent with the LINZ request and most other councils. In relation to the last paragraph regarding as built information for individual connections – This statement is too vague and a format should be specified. i.e. for one extra connection for a 2 lot subdivision to a multi-lot subdivision with roading. Standard Drawing R3A 6 x 6m entrance for two lots is too wide

to be practical for residential/urban lots. The large percentage of street frontage taken up with ROW will create an unattractive streetscape as more infill development occurs, and it will increase the impermeable surface and decrease the available area for outdoor living which are both negative effects on the urban area. [7.3.10.3](#) Number of Connections This paragraph implies that common services may only occur within a body corporate, tenants in common or company. Easements may be just as effective, and much less complex and costly, in sharing the responsibility for services, so allowance should be made in this paragraph for multiple connections to be covered by an easement. 7.4 Method of Disposal a) No piped system is immediately available or will not be available within 10 years of the subdivision application The above clause implies that if a piped system will be available within the next 10 years, that on site disposal of wastewater will not be permitted. I submit that this is rephrased to “No piped system is immediately available”.

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**Do you support the changes to the District Plan to align with the proposed new Code of Practice?**

Yes

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**What concerns, if any, do you have around the incorporation of the proposed new Code of Practice into the District Plan?**

My main concern is that some of the more stringent requirements for roads are being imposed on Invercargill streets, which I do not believe are either necessary or desirable.

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**Would you like to speak to SDC and ICC to support your submission on the proposed new Code of Practice?**

Yes

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**Would you like to receive updates about Invercargill City Council's future consultations and engagements?**

Yes

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**Phone number:**

0272375011

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**Email:**

annabel@absoluteland.co.nz

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**From:** [Policy](#)  
**To:** [Theresa Cavanagh](#); [Francisco Barraza](#)  
**Subject:** FW: Change to submission re. Code of Practice  
**Date:** Tuesday, 13 June 2023 10:36:10 am  
**Attachments:** [image002.jpg](#)

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**This message is from an external sender**

Kia ora kōrua, please see below a changed submission relating to the district plan change.

Ngā mihi,  
Hannah

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**From:** Annabel Small <[annabel@absoluteland.co.nz](mailto:annabel@absoluteland.co.nz)>  
**Sent:** Sunday, 11 June 2023 1:16 PM  
**To:** Policy <[Policy@icc.govt.nz](mailto:Policy@icc.govt.nz)>  
**Cc:** Lloyd Gauntlett <[lloyd@absoluteland.co.nz](mailto:lloyd@absoluteland.co.nz)>  
**Subject:** FW: Change to submission re. Code of Practice

Hi

I made a submission on Thursday in relation to the changes to the Code of Practice for ICC and SDC.

I ticked a box which stated that I supported the changes to the CoP being put straight into the District Plan. I wish to change this statement to “No, I do not wish to support the changes being put directly into the District Plan”.

I believe that the CoP, as it is currently, is in need of far too many changes to warrant it being integrated without further discussion into the District Plan, and am concerned that the ramifications of errors or matters warranting further discussions being included will cause real problems for all concerned. In addition, the short timeframe given for consultation has meant that we have not had time to put together as thorough a response as we feel the document needs, given its importance. This makes it even more important that it is not integrated into the District Plans yet.

I may be prepared to change my position on this matter after the CoP is finalised, but for now, I wish my submission to show that I do not support the CoP being integrated into the District Plans without further consultation. Thank you.

Regards,

**Annabel Small**

Resource Management Planner/Director



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