

Form 5

Submission on notified Subdivision, Land Use and Development Code of Practice and associated District Plan Changes

Clause 6 of Schedule 1, Resource Management Act 1991

To: Invercargill City Council and Southland District Council

Submission on: Proposed Code of Practice for Subdivision, Land Use and Development

Name of Submitter: Fire and Emergency New Zealand

This is a submission on the notified proposed Code of Practice for Subdivision, Land Use and Development (COPSLUD) by Invercargill City Council (ICC) and Southland District Council (SDC) which will replace the current ICC Code of Practice for Land Development and Subdivision Infrastructure Bylaw and SDC Subdivision, Land Use and Development Bylaw. This submission also relates to the subsequent changes to the ICC District Plan and SDC District Plan.

Fire and Emergency is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (RMA).

Fire and Emergency **support** the notified COPSLUD, subject to the relief sought in this submission.

The specific provisions of the proposal that Fire and Emergency's submission relates to are:

- The provision for firefighting water supply
- Emergency service 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 District Plan to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

In order for Fire and Emergency to achieve their principle objective which includes reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property land, and the environment, Fire and Emergency requires adequate water supply be available for firefighting activities; and adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies.

The provision for adequate water supply is therefore critical. It is important to Fire and Emergency that any new subdivision or land use has access to adequate water supply (whether reticulated or non-reticulated). This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA.

Emergency Vehicle Access

Adequate fire appliance access to both the source of a fire (or other emergency) and a firefighting water supply is essential to the efficient operation of Fire and Emergency. The requirements for firefighting access are set out in the *New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008)* and are further detailed in *Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access F5-02 GD* (December 2021).

These requirements are necessary for Fire and Emergency to be able to operate pumping appliances from a hard standing. Often, this can be done from the public road, and this is how Fire and Emergency prefers to operate where possible. Pumping appliances are vehicles used to pump water for firefighting (refer Appendix A of the Fire and Emergency's 'Designers' guide). They carry a relatively small amount of water (1,350–2,000 litres) and have a limited length of hose. Accordingly, Fire and Emergency must have access to a water supply and must also be able to base operations near the fire source, so firefighters can reach the fire with water.

To support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to developments across Invercargill City and Southland District, Fire and Emergency require:

- Pedestrian accessways that are clear, unobstructed and well-lit,
- Wayfinding for different properties on a development are clear in day and night,
- That developments give effect to the guidance provided in the Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access F5-02 GD' (December 2021)¹,

Firefighting water supply

It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing and that this water supply has adequate capacity and pressures 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 Invercargill City and Southland District, water is sourced from the reticulated water supply network however where reticulation is not available or limited (i.e. trickle fed), alternative water sources will be required. This may be in the form of dedicated water tanks or ponds 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 the SNZ PAS 4509:2008. The SNZ PAS 4509:2008 is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access in order for Fire and Emergency to operate effectively and efficiently in an emergency.

Fire and Emergency generally support the provisions within the proposed COPSLUD with respect to firefighting water supply in accordance with SNZ PAS 4509:2008. Fire and Emergency considered that the proposed COPSLUD adequately addresses firefighting water supply for residential developments. However, it is not clear how the standards intend to manage non-residential developments that cannot be connected to a high pressure supply and require higher fire water classification.

¹ The Fire and Emergency Designers Guide to Firefighting Operations for emergency vehicle access provides help to ensure building designs comply with the NZBC C5 and can be found here: <https://www.fireandemergency.nz/assets/Documents/Business-and-Landlords/Building-and-designing-for-fire-safety/F5-02-GD-FFO-emergency-vehicle-access.pdf>

District Plan Provisions

Fire Emergency considers that all subsequent subdivision and development should be subject to development standards within the district plans requiring all applicants to demonstrate by way of providing evidence (i.e hydrant glow testing) that their development can be adequately serviced for firefighting water supply in accordance with the SNZ PAS 4509:2008 across all zones within Invercargill City and Southland District. If this does not become part of the consenting regime, there will likely be development within inadequate firefighting water supply with potentially serious consequences for life and property.

Fire and Emergency support SDC's approach where reticulated water infrastructure and transportation standards including access must be designed in accordance with the proposed COPSLUD. Additionally, Fire and Emergency support the provision for Subdivision within the Urban Zone being designed in accordance with the proposed COPSLUD. However, Fire and Emergency are concerned that the provisions within the Southland District Plan (SDP) do not adequately provide for firefighting water supply at the land use stage where there may not be sufficient capacity within the reticulated network or no connection to the network available.

Fire and Emergency support ICC's provisions for fire safety, including water supply and access within the current district plan. However, Fire and Emergency are concerned about the use of notes instead of rules to enforce the COPSLUD under the Invercargill City District Plan (ICDP). This poses a risk to Fire and Emergency as it is technically non-statutory and serves as a guide for developers to demonstrate compliance only.

Fire and Emergency seek the following decision from the local authority:

Appendices A – C sets out the details of Fire and Emergency's submission, including amendments sought by Fire and Emergency to specific provisions in the COPSLUD, ICC Plan Change 2 and SDC proposed changes to the district plan, and the reasons for the amendments.

Fire and Emergency would welcome any questions or further engagement on matters raised in the submission.

Fire and Emergency may wish to be heard in support of its submission depending on the proposed amendments.

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



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

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Appendix A – Code of Practice for Subdivision, Land Use and Development

The following table sets out the specific position and any amendment sought by Fire and Emergency. Where specific amendments to provisions of the Code of Practice for Subdivision, Land Use and Development are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Proposed Provision	Support / Oppose	Submission	Relief Sought
Section 5. Roads				
1	<p>5.3.3.4 Vertical Grade</p> <p>Minimum gradient is 0.5%. Maximum gradients shall be as per Section 5.3.17.1. Steeper gradients may be acceptable for shorter lengths of road in hilly country or low overall speed environments subject to Council approval. Where the gradient of a public road is steeper than 12.5%, Council approval will be required.</p>	Support	<p>Fire and Emergency support the provision for vertical grade within the COPSLUD, specifically the requirement for Council approval where the public road is steeper than 12.5%. A gradient of 12.5% or less is considered to be suitable for fire appliances. Where the vertical grade is greater than 12.5% Council will be able to consider implications for fire appliances.</p>	Retain as notified.
2	<p>5.3.17.1 Plan and Gradient Design</p> <p>Table 5-4 should be used as a guide to the width of elements required for accesses and crossings.</p> <p>A maximum 3-point turning head in the common area shall be provided at the end of all accesses serving three or more rear lots or dwelling units. Circular, L, T, or Y shaped heads are acceptable. Suitable dimensions are shown in Figure 5-3 and Figure 5-4.</p> <p>For accesses serving fewer than three lots or dwelling units, turning heads in the common area are not required where it can be shown that adequate turning area is available within each lot or private area. Centre line grades should:</p> <p>(a) Not be steeper than 1 in 5 although gradients of 1 in 4.5 may be used on straight lengths of access over distances of up to 20 m. The first 5 m of any access shall be not steeper than 1 in 8.</p>	Support	<p>Fire and Emergency support the provision for accessing fewer than three lots to the extent that the gradient shall not be steeper than 1 in 5 and the first 5m should not be steeper than 1 in 8.</p>	Retain as notified.

	A greater length of transition shall be provided where necessary on non-residential accesses. (b) Not be less than 1 in 250.											
3	Figure 5.3 Dimensions of No-Exit Road Turning Areas	Support in part	<p>Fire and Emergency support in part the dimensions of No-Exit Road turning areas.</p> <p>Figure 5.3 indicates that within Residential Areas the radius of the turning area will be 9.5m.</p> <p>According to “<i>Designers’ guide to firefighting operations Emergency vehicle access, F5-02 GD</i>” fire appliances require that the minimum turning radius of turnaround areas is no less than 11.3m for a pumping vehicle and 12.5m for aerial vehicles. As such, 9.5m in the residential area is not considered suitable to enable quick and easy access for fire appliances.</p> <p>A 15m radius in the commercial and industrial areas is suitable for fire appliances.</p> <p>Fire and Emergency therefore request that the dimensions of No-Exit Road Turning Areas in the residential area is amended to 12.5m to enable quick and easy access for fire appliances.</p>	<p>Amend as follows:</p> <table border="1"> <thead> <tr> <th colspan="2">Radius Table</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>9.5 m <u>12.5 m</u></td> </tr> <tr> <td>Commercial</td> <td>15 m</td> </tr> <tr> <td>Industrial</td> <td>15 m</td> </tr> </tbody> </table>	Radius Table		Residential	9.5 m <u>12.5 m</u>	Commercial	15 m	Industrial	15 m
Radius Table												
Residential	9.5 m <u>12.5 m</u>											
Commercial	15 m											
Industrial	15 m											
4	<p>5.3.18 Vehicle Crossing</p> <p>All regularly used vehicle crossings (e.g. urban, rural, residential, commercial and industrial) are formed, surfaced and drained to allow safe and effective vehicle access from carriageway to the property boundary and in locations giving visibility equal to the safe stopping distance for the carriageway speed limit.</p> <p>Vehicle crossings shall be constructed in accordance with Standard Drawings R21 – R23 in urban areas, and R28 – R30 in rural areas.</p> <p>The sight distances outlined in the “Sight Distances” figure in Section 5.5.1 shall be</p>	Support in part	<p>Fire and Emergency generally support the provisions for vehicle crossings which have been set out in Standard Drawings R21-R23 for Urban Areas and R28-R30 in rural areas subject to the relief sought below regarding R28 Double Rural Accessway Layout.</p> <p>Generally, the vehicle crossings provide a minimum vehicle crossing width of 3.5m which is considered suitable for fire appliances. In the rural area, Standard Drawing R28A through to R30 provides a vehicle crossing greater the 3.5m which is the minimum requirement for fire appliances.</p>	Retain as notified.								

	<p>used as a guide when assessing the adequacy of visibility at new accessways. No access to an individual plot shall be located within a clear distance of 5m from any corner (channel line) or intersection in the road that it connects to. The preferred separation wherever possible is 9m from the tangent of the intersection.</p> <p>At the time of subdivision or development, any existing crossing providing access to the road shall be upgraded to Council's standard or permanently removed. All spacing's between crossings (whether farm access or otherwise) shall be maintained as set out above. This requirement also applies to existing crossings where a lot is being subdivided.</p>			
5	Table 5.4 Road Design – Cross section Standards	Support	<p>Fire and Emergency support the provisions set out Table 5.4 Road Design Cross Section Standards.</p> <p>These standards generally provide a carriageway width of greater than 4m which is suitable for fire appliances.</p> <p>Private (right of ways) streets which serve 1 to 3 units will have a minimum carriageway width of 3m. Private (right of way) streets which serve 4 to 6 will also require a minimum carriageway width of 3m however, to allow vehicles to pass, passing bays (with a minimum 6 m carriageway width) are required every 50m in urban areas, and every 100 m in rural areas. Where a private way adjoins a Collector or higher, it shall also have a 6m carriageway width for a minimum length of 6m from the road boundary.</p> <p>While it would be Fire and Emergency's preference that Fire and Emergency are able to access all properties with their vehicles, Fire and Emergency support the 3m width that applies. However, this</p>	Retain as notified

			support is subject to these buildings being no more than 75m from the road. Fire and Emergency also support the 6m carriageway width every 50m in urban areas as this may provide a hardstanding area.	
6	Figure R28 – Double Rural Accessway Layout Rev: 2 Date: 03/23	Oppose	<p>Fire and Emergency oppose the dimensions for the Double Rural Accessway Layout which are provided in Figure R28.</p> <p>Fire appliances require a minimum vehicle crossing width of 3.5m. The double rural accessway layout has an accessway width of between 3.0 – 3.5m which is not considered suitable for fire appliances.</p> <p>Therefore, Fire and Emergency request that the vehicle crossing width for double rural accessways is a minimum of 3.5m. Subsequently, the minimum driveway width needs to be amended to 7m to be suitable for fire appliances.</p>	<p>Amend as follows: Driveway to private property</p> <p>6.5m-7.0m min (+X)</p> <p>Driveway 3.0m – 3.5m</p>
Section 8. Water Supply				
7	<p>8.2.1 Objectives</p> <p>The objectives are to ensure that the water reticulation system is functional, the required quality and quantity of water is supplied to all customers within Council's designated water supply area, and Council's requirements are satisfied. The design shall ensure an acceptable water supply for each property including fire flows, depending on Council policies by providing either:</p> <p>(a) A water main allowing an appropriate point of supply to each property. (b) A service connection from the main for each property.</p> <p>The designer shall consider: (g) The requirements of SNZ PAS 4509 ...</p>	Support	<p>Fire and Emergency support Objective 8.2.1 which ensures that the water reticulation system is functional, the required quality and quantity of water is supplied to all customers within Council's designated water supply area.</p> <p>This objective includes fire flows and designers to consider the requirements of SNZ PAS 4509.</p>	Retain as notified.

8	<p>8.3.2 System Design</p> <p>Water mains shall be designed with sufficient capacity to cater for all existing and predicted development within the area to be served and to meet the requirements of SNZ PAS 4509, and NZ Fire Service, Fire Fighting Water Supplies Code of Practise.</p> <p>The water demand allowance in the subdivision design shall include provision for:</p> <p>...</p>	Support	<p>Fire and Emergency support the water supply system being designed with sufficient capacity to cater for all existing and predicted development within the areas to be served and meet the requirements of SNZ PAS 4509.</p> <p>New water supply pipelines should provide sufficient capacity and pressure for Fire and Emergency during an incident.</p>	Retain as notified.
9	<p>8.3.3.1 Hydraulic Design</p> <p>...</p> <p>The hydraulic design shall meet:</p> <p>(a) A peak hourly demand pressure no less than 250Kpa; and</p> <p>(b) Firefighting demand plus two thirds of peak hourly demand no less than 100Kpa</p>	Support	<p>Fire and Emergency support the provision for firefighting demand plus two thirds of peak hourly demand no less than 100Kpa as a hydraulic design requirement.</p> <p>The hydraulic design requirement shall provide sufficient water capacity and pressure for Fire and Emergency.</p>	Retain as notified.
10	<p>8.3.3.2 Network Analysis</p> <p>Where required by Council, a network analysis of the system shall be undertaken. The system shall be analysed using a mathematical model of the network to ensure adequate water supply is available to all consumers connected to the system for all defined modes of operation. The analysis shall include all elements within the system and shall address all demand periods including peak demand, low demand flows, and fire flows.</p>	Support	<p>Fire and Emergency support the provision for network analysis as this ensures adequate water supply is available to all consumers connected to the system for all defined modes of operation. The network analysis includes peak demand, low demand flows and fire flows ensuring that there is adequate capacity and pressure for firefighting water supply.</p>	Retain as notified.
11	<p>8.3.3.6 Minimum Flows</p> <p>The minimum flow shall be the greater of:</p> <p>(a) 25 L/min for normal residential sites.</p> <p>(b) Fire flows as specified in SNZ PAS 4509.</p>	Support	<p>Fire and Emergency support the minimum flows provision as it provides the greater of 25L/min or fire flows specified in SNZ PAS 4509. Therefore, the minimum flow will provide sufficient firefighting water capacity and pressure.</p>	Retain as notified.

12	<p>8.3.3.7 Minimum Water Demand</p> <p>The minimum peak domestic demand shall be specified by Council, or:</p> <p>...</p> <p>(c) Firefighting demands as specified in SNZ PAS 4509</p> <p>...</p> <p>The network is to be designed to suit both scenarios of:</p> <ul style="list-style-type: none"> • Peak hourly demand no less than 250Kpa; and • Firefighting plus two thirds of peak hourly demand no less than 100Kpa 	Support in part	<p>Fire and Emergency support the minimum water demand to be specified by Council or Firefighting demands in accordance with SNZ PAS 4509.</p> <p>Fire and Emergency support the provision for minimum water demand as it is designed to suit peak hourly demand no less than 250Kpa; and firefighting plus two thirds of peak hourly demand no less than 100Kpa.</p> <p>However, Fire and Emergency request that SNZ PAS 4509 is incorporated into the design scenario to ensure that the minimum water demand is adequate and in accordance with SNZ PAS 4509.</p>	<p>8.3.3.7 Minimum Water Demand</p> <p>The minimum peak domestic demand shall be specified by Council, or:</p> <p>...</p> <p>(c) Firefighting demands as specified in SNZ PAS 4509</p> <p>...</p> <p>The network is to be designed to suit both scenarios of:</p> <ul style="list-style-type: none"> • Peak hourly demand no less than 250Kpa; and • Firefighting (as specified in SNS PAS 4509). plus two thirds of peak hourly demand no less than 100Kpa
13	<p>8.3.3.10 Maximum Pressure Requirements</p> <p>An output of the hydraulic design of a pipeline is the specification of the maximum pressure that may be imposed on the pipeline during operation.</p> <p>...</p> <p>The outputs of water main hydraulic design shall include:</p> <p>...</p> <p>(i) Flow and pressure compliance with peak demand and firefighting demand scenarios.</p>	Support	<p>Fire and Emergency support the provision for Maximum Pressure Requirements as the output of water main hydraulic design should include flow and pressure compliance with peak demand and firefighting scenarios.</p>	Retain as notified.
14	<p>8.3.5.11 Location marking of valves and hydrants</p> <p>Hydrant location markings shall be according to SNZ PAS 4509. Additionally reinforced concrete marker posts shall be set in the ground opposite the hydrant or valve and close to property boundaries. Marker posts shall have inscribed letters as below.</p> <ul style="list-style-type: none"> • “V” to indicate sluice valves, painted white 	Support	<p>Fire and Emergency support the provision for the location marking of valves and hydrants in accordance with SNZ PAS 4509.</p>	Retain as notified.

	<ul style="list-style-type: none"> • “AV” to indicate air valves, painted red • “SV” to indicate scour valves, painted blue] • The location marking of stop valves, service valves, and fire hydrants shall be to SNZ PAS 4509 and CoP Standard Drawings. 			
15	<p>8.3.9 Fire protection services</p> <p>Many commercial and industrial developments require installation of special fire protection services. While it is the responsibility of the site owner to provide these fire services, the developer shall design the water reticulation system to meet the required demands, where these are known in advance.</p> <p>Where a development cannot be connected to a high pressure supply the following will apply for each dwelling ≤ 200m² (any larger dwelling shall have a specifically designed system for fire protection services).</p> <p>Each allotment will require:</p> <p>(a) A minimum of 20,000 litres shall be maintained at all times as a static fire fighting reserve within a 30,000 litre tank. Alternatively, a 7,000 litre fire fighting reserve is to be made available for each dwelling in association with a domestic sprinkler system. Underground tanks or tanks that are partially buried (provided that the top of the tank is no more than 1 metre above ground level) may be accessed by an opening in the top of the tank and couplings are not required.</p> <p>A fire fighting connection in accordance with SNZ PAS</p>	Support in part	<p>Fire and Emergency support in part the following provisions which relate to dwellings less than 200m² that cannot be connected to high pressure supply:</p> <p>8.3.9 (a) - that requires a minimum of 20,000 L to be maintained at all times in a 30,000 L tank or a 7,000L firefighting reserve in association with a domestic water supply system.</p> <p>Although SNZ PAS 4509 requires a fire connection within 90 m of a proposed building site, it is preferable for Fire and Emergency that this connection is within 75m of a building due to the hose lengths of fire appliances.</p> <p>8.3.9 (b) – that requires a 4m accessway, hardstand area suitable for fire appliance parking, and an accessway that is maintained at all time.</p> <p>8.3.9 (c) – that requires coupling connections that are compatible with fire service equipment.</p> <p>Fire and Emergency are concerned about the fire protection services for residential developments greater than 200m², commercial and industrial developments. Fire and Emergency are therefore seeking relief to bring fire protection services to the front on mind for these developments.</p>	<p>Amend as follows:</p> <p>(a) A minimum of 20,000 litres shall be maintained at all times as a static fire fighting reserve within a 30,000 litre tank. Alternatively, a 7,000 litre fire fighting reserve is to be made available for each dwelling in association with a domestic sprinkler system. Underground tanks or tanks that are partially buried (provided that the top of the tank is no more than 1 metre above ground level) may be accessed by an opening in the top of the tank and couplings are not required.</p> <p>A fire fighting connection in accordance with SNZ PAS 4509:2008 is to be located within 90-m <u>75m</u> of any proposed building site. The Fire Service connection point/coupling/fire hydrant must be located so that it is not compromised in the event of a fire.</p> <p>...</p> <p><u>Where a development cannot be connected to a high pressure supply the following will apply for each dwelling > 200m², commercial and industrial development.</u></p> <p><u>Each allotment will require:</u></p> <p>(a) <u>A sprinkler system installed (to an approved standard in accordance with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice) in the building, plumbed to</u></p>

4509:2008 is to be located within 90 m of any proposed building site. The Fire Service connection point/coupling/fire hydrant must be located so that it is not compromised in the event of a fire.

- (b) Heavy-duty vehicle access a minimum of 4 m wide to a connection site on a hardstand area suitable for fire service appliance parking. Access shall be maintained at all times to the hardstand areas. The connection site shall be within 6 m of the water source.
- (c) Fire Service coupling connections that are compatible with Fire Service equipment. The fittings are to comply with the following standard, being either:
 - 70 mm instantaneous couplings (female) to SNZ PAS 4509, or
 - 100 mm and 140 mm suction coupling (female) to SNZ PAS 4509 with the hose tail of the same diameter as the threaded coupling, eg 140 mm coupling to have 140 mm hose tail.

Alternatively, communal water supply tanks servicing a number of properties may be utilised provided that:

- At least two tanks are located within 135 m of each building.
- Each tank has at least 45 m³ capacity.
- Permanent couplings as detailed above for private tanks are installed at each tank.

- ensure a sufficient quantity of water (calculated in accordance with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice) is always available to the sprinkler system in the event of a fire; or
- (b) A water tank containing a sufficient quantity of water (calculated in accordance with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice) always available as a static fire fighting reserve.

16	8.3.13.2 Hydrants for firefighting The spacing of hydrants for firefighting shall be in accordance with SNZ PAS 4509.	Support	Fire and Emergency support the provision whereby the spacing for hydrants for firefighting shall be in accordance with SNZ PAS 4509. This shall provide sufficient access for water supply to enable Fire and Emergency to carry out their duties efficiently and effectively.	Retain as notified.
17	8.3.14.4 Permanent ends of watermains The DN 100 main shall be laid to a point where all properties are provided with the fire protection required by SNZ PAS 4509. A method of flushing shall be provided at the end of the water main, which shall be suitably anchored.	Support	Fire and Emergency support the permanent ends of water mains being laid to a point where all properties are provided with fire protection required by SNZ PAS 4509.	Retain as notified.
18	Figure W18 – Fire Hydrant Marking Rev: 2 Date: 03/2023	Support	Fire and Emergency support the Fire Hydrant Marking Figure W18 as this is in accordance with SNZ PAS 4509.	Retain as notified.

Appendix B – Invercargill City District Plan – Plan Change 2

The following table sets out the specific position and any amendment sought by Fire and Emergency. Where specific amendments to provisions of Plan Change 2 are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Proposed provision	Support / Oppose	Submission	Requested Relief
Part 2 – Issues, Objectives and Polices				
1	<p>SUB – M5</p> <p>Recognise and enforce the Invercargill City Council Bylaw 2016/1 Code of Practice for Land Development and Subdivision Infrastructure <u>Invercargill City Council Code of Practice for Subdivision and Infrastructure</u> for the development, operation, upgrading and replacement of infrastructure carried out as part of a subdivision.</p>	Support	<p>Fire and Emergency support the inclusion of the Code of Practice for Subdivision and Infrastructure into the methods of implementation for development, operation, upgrading and replacement of infrastructure as part of subdivision as this would account for firefighting water supply and access.</p>	Retain as notified.
2	<p>RES3Z – P8 – Infrastructure – Water</p> <p>To encourage on-site water management in preference to connection to Council's reticulated water supply.</p> <p><i>Explanation:</i></p> <p><i>Connection to the Council's reticulated water supply is not a requirement for the Residential 3 Zone nor can the Council guarantee that water supply will be available throughout the zone. Developers will be responsible at a cost to them, with no contribution from the Council, for any extensions and connections to the Council's reticulated water supply. Where water reticulation is installed as part of any development undertaken it is required to be constructed in accordance with the standards and procedures of the Council's Bylaw 2016/1 Code of Practice for Land</i></p>	Support in part	<p>Fire and emergency support the updating of the infrastructure water policy for on-site water management to reflect the new code of practice for subdivision and infrastructure.</p> <p>However, Fire and Emergency request that the Code of Practice for Subdivision and Infrastructure is incorporated into the policy which reflects further relief that Fire and Emergency are seeking with respect to incorporation the Code of Practice into the Rules to make it enforceable under the Resource Management Act 1991 (RMA).</p>	<p>Amend as follows:</p> <p>To encourage on-site water management in preference to connection to Council's reticulated water supply <u>in accordance with the Invercargill City Council Code of Practice for Subdivision and Infrastructure.</u></p>

<p>Development and Subdivision Infrastructure <u>Invercargill City Council Code of Practice for Subdivision and Infrastructure.</u></p>			
<p>3 RES4Z – P10 Infrastructure – Water To encourage on-site water management in preference to extension of and connection to Council’s reticulated water supply.</p> <p><i>Explanation:</i> ... <i>Connection to the Council’s reticulated water supply is not a requirement for this zone nor can the Council guarantee that water supply will be available throughout the zone. The Council has no intention of extending water services to this area of the District. Developers will be responsible at cost to them, with no contribution from the Council, for any extensions and connections to the Council’s reticulated water supply. Where water reticulation is installed as part of any development it is required to be Invercargill City District Plan Part Two Page 115 August 2019 Residential 4 (Residential Transition) Zone constructed in accordance with the standards and procedures of the Council’s Bylaw 2016/1 Code of Practice for Land Development and Subdivision Infrastructure</i> <u>Invercargill City Council Code of Practice for Subdivision and Infrastructure</u> ...</p>	<p>Support in part</p>	<p>Fire and emergency support the updating of the infrastructure water policy for on-site water management to reflect the new code of practice for subdivision and infrastructure.</p> <p>However, Fire and Emergency request that the Code of Practice for Subdivision and Infrastructure is incorporated into the policy which reflects further relief that Fire and Emergency are seeking with respect to incorporation the Code of Practice into the Rules to make it enforceable under the Resource Management Act 1991 (RMA).</p>	<p>Amend as follows: To encourage on-site water management in preference to connection to Council’s reticulated water supply <u>in accordance with the Invercargill City Council Code of Practice for Subdivision and Infrastructure.</u></p>

4	<p>RURZ – P7 – Deferred Zone Infrastructure – Transportation:</p> <p>Within the area identified on the District Planning Maps as Rural Zone (Deferred Residential 4 Zone), to provide for alternative modes of transport by methods such as requiring a footpath be developed along the length of the eastern side of Retreat Road in accordance with the relevant Concept Plan in APP5 – Appendix 5 Concept Plans prior to the zone becoming operative.</p> <p><i>Explanation:</i></p> <p>...</p> <p><i>The development, operation, maintenance, upgrading and replacement of infrastructure is provided for in the Invercargill City Council Bylaw 2016/1 Code of Practice for Land Development and Subdivision Infrastructure <u>Invercargill City Council Code of Practice for Subdivision and Infrastructure</u> and require authorisation pursuant to that bylaw <u>Code of Practice</u>. Infrastructure intended to be vested in Council ownership, unless otherwise approved, is required to be designed and constructed to meet the requirements of the Bylaw <u>Code of Practice</u></i></p>	Support in part	<p>Fire and emergency support the updating of the transportation policy to reflect the new code of practice for subdivision and infrastructure.</p> <p>However, Fire and Emergency request that the Code of Practice for Subdivision and Infrastructure is incorporated into the policy which reflects further relief that Fire and Emergency are seeking with respect to incorporation the Code of Practice into the Rules to make it enforceable under the Resource Management Act 1991 (RMA).</p>	<p>Amend as follows:</p> <p>Within the area identified on the District Planning Maps as Rural Zone (Deferred Residential 4 Zone), to provide for alternative modes of transport by methods such as requiring a footpath be developed along the length of the eastern side of Retreat Road in accordance with the relevant Concept Plan in APP5 – Appendix 5 Concept Plans and the Invercargill City Council Code of Practice for Subdivision and Infrastructure prior to the zone becoming operative.</p>
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Part 3 – Rules

5	<p>UTIL – R1</p> <p>Utilities are a permitted activity subject to the standards set out in UTIL-R2 – UTIL-R23 below.</p> <p><i>Note: The development, operation, maintenance, upgrading and replacement</i></p>	Support in part	<p>Fire and Emergency support in part the updating of the reference to the Invercargill City Council Code of Practice for Subdivision and Infrastructure with respect to the development, operation, maintenance, upgrading and replacement of infrastructure.</p>	<p>Amend as follows:</p> <p>Utilities are a permitted activity subject to the standards set out in UTIL-R2 – UTIL-R23 below and the Invercargill City Council Code of Practice for Subdivision and Infrastructure.</p>
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		<p>of infrastructure is provided for in the Invercargill City Council Bylaw 2016/1 Code of Practice for Land Development and Subdivision Infrastructure <u>Invercargill City Council Code of Practice for Subdivision and Infrastructure</u> and may require authorisation pursuant to that bylaw <u>Code of Practice</u>. Infrastructure intended to be vested in Council ownership, unless otherwise approved, is required to be designed and constructed to meet the requirements of the Bylaw <u>Code of Practice</u>.</p>	<p>However, the use of notes instead of inclusion into rules that are enforceable under the District Plan poses a risk to Fire and Emergency in that the Code of Practice for Subdivision and Land Use may not be adequately enforced under the RMA. As a result, water supply pipelines may be developed that are not of sufficient capacity to meet firefighting water supply demands.</p> <p>Therefore, Fire and Emergency request that reference to the Invercargill City Council Code of Practice for Subdivision and Infrastructure is embedded within the rule itself.</p>
<p>6 RES4Z – R19 Applications under RES3Z -R17 and RES3Z – R18 above shall address the following matters, which will be among those taken into account by Council:</p> <ol style="list-style-type: none"> 1. The extent of impermeable surfaces which must be drained via the City’s stormwater reticulation system 2. The extent to which solar gain to the living areas is achieved 3. The extent to which practicable outdoor living is achieved 4. The extent to which the development achieves good urban design outcomes. <p>Services <i>Note: The developer will be responsible for costs of any extension of, and connection to, Council’s infrastructure. Extensions and connections will require authorisation pursuant to the Invercargill City Council Bylaw 2016/1 Code of Practice for Land Development and Subdivision <u>Invercargill City Council Code</u></i></p>	<p>Support in part</p>	<p>Fire and Emergency support in part the updating of the reference to the Invercargill City Council Code of Practice for Subdivision and Infrastructure with respect to services and the matters that need to be addressed.</p> <p>However, the use of notes with respect to services instead of inclusion into rules that are enforceable under the district plan poses a risk to Fire and Emergency in that the Code of Practice for Subdivision and Land Use may not be adequately enforced under the RMA. As a result, services such as water supply pipelines may be developed that are not of sufficient capacity to meet firefighting water supply demands.</p> <p>Therefore, Fire and Emergency request that reference to the Invercargill City Council Code of Practice for Subdivision and Infrastructure is embedded within the rule itself.</p>	<p>Amend as follows: Applications under RES3Z -R17 and RES3Z – R18 above shall address the following matters, which will be among those taken into account by Council:</p> <ol style="list-style-type: none"> 1. The extent of impermeable surfaces which must be drained via the City’s stormwater reticulation system 2. The extent to which solar gain to the living areas is achieved 3. The extent to which practicable outdoor living is achieved 4. The extent to which the development achieves good urban design outcomes 5. <u>The extent to which extensions and connections to services will be in accordance with Invercargill City Council Code of Practice for Subdivision and Infrastructure.</u>

	<u>of Practice for Subdivision and Infrastructure</u>			
7	APP11-3 – Private Ways and Right of Ways	Support	<p>Fire and Emergency support ICC in updating APP11-3 to align with the proposed Invercargill City Council Code of Practice for Subdivision and Development.</p> <p>This provides private ways or right of ways which are a minimum of 3m. This is considered to be suitable for emergency service appliances.</p>	Retain as notified.

Appendix C – Southland District Plan Provisions

The following table sets out the specific position and any amendment sought by Fire and Emergency. Where specific amendments to provisions of the District Plan are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Proposed Provision	Support / Oppose	Submission	Relief Sought
Section 2.6 Subdivision				
1	<p>Policy SUB.6 Subdivision is undertaken in compliance with the Southland District Council Land Use and Development Bylaw 2012 <u>Subdivision, Land Use and Development Code of Practice 2023</u> (or its applicable successor).</p> <p>Explanation: The subdivision process is the appropriate time to ensure that connections to utility services and transport infrastructure are created. Requirements relating to vehicle access and connections to utility services are set out in Council's Land Use and Development Bylaw 2012 <u>Subdivision, Land Use and Development Code of Practice 2023</u> (or its applicable successor). The Bylaw Code sets minimum standards required by Council and ensures there is a consistent approach to subdivision and development across the District.</p>	Support	Fire and Emergency support the amendment to Policy Sub.6 to include reference to the proposed SDC COPSLUD to the extent that it enables subdivision to be undertaken in compliance with the COPSLUD.	Retain as notified.
2	<p>Rule SUB.1 Permitted Activity Applications for certification of allotments on an existing Survey Plan under section 226(1)(e)(ii) of the Resource Management Act must</p>	Support in part	Fire and Emergency support in part Rule Sub.1 (1) that requires access to comply with the minimum sight distances formation standards outlined in the COPSLUD, subject to the relief that is sought in Appendix 1 regarding access.	<p>Amend as follows:</p> <p>4. In addition to (a) – (c) <u>lots</u> of less than 2,000m² un the Urban, Rural Settlement Areas or Rural Zones must also:</p> <p>...</p>

ensure all allotments for certification comply with the following criteria:

1. Access must comply with minimum sight distances and formation standards outlined in the ~~Subdivision, Land Use and Development Bylaw~~ Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor).

....

4. In addition to (a) - (c), lots of less than 2,000 m² in the Urban, Rural Settlement Areas or Rural Zones must also:

(a) Have power and telephone services connected to the boundary.

(b) Have water, wastewater and surface water infrastructure connected to the boundary where that infrastructure is provided in that zone or where the lot is within 500 metres of a reticulated network, in accordance with the requirements of the ~~Subdivision, Land Use and Development Bylaw~~ Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor).

(c) Be able to comply with NZS 1547:2012 "On-Site Domestic Wastewater Management where the lot is greater than 500 metres

Fire and Emergency support in part Rule SUB.1 (4) (b) to the extent that water infrastructure is connected at the boundary where it is provided for within that zone, or where the lot is within 500 metres of a reticulated network, is in accordance with the COPSLUD.

Given the importance and role of emergency services, Fire and Emergency request that the rule be amended to include specific provision for firefighting water supply whether it is reticulated or non-reticulated, in accordance with the COPSLUD.

- (b) Have water including firefighting water in accordance with SNZ PAS 4509, wastewater and surface water infrastructure connected to the boundary where that infrastructure is provided in that zone or where the lot is within 500 metres of a reticulated network, in accordance with the requirements of the ~~Subdivision, Land Use and Development Bylaw~~ Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor).

	<p>from reticulated wastewater infrastructure.</p>			
<p>3</p>	<p>Rule SUB.2 Controlled Activity ... 3. Amendments to cross-lease subdivisions; where they comply with the following criteria: (a) The Standards set out in the Southland District Council Subdivision, Land Use and Development Bylaw 2012. <u>Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor).</u> ... The matters over which Council reserves its control for Rule SUB.2 (1), (2) and (3) are: 1. The provision of services including adequate provision of on-site wastewater systems where required. 2. The need for financial contributions and/or bonds. 4. Subdivision within the Urban Zone where each allotment complies with the following criteria: ... (f) The standards set out in the Southland District Council Subdivision, Land Use and Development Bylaw 2012. <u>Subdivision, Land Use and</u></p>	<p>Support in part</p>	<p>Fire and Emergency support SUB.2 (3) (a) to the extent that amendments to cross-lease subdivisions must comply with the standards of the COPSLUD. Fire and Emergency note the importance to maintain firefighting water supply associated with subdivisions. Fire and Emergency seek that Council consider this as a matter of control when compliance is not achieved. Fire and Emergency support SUB.3 (4) (f) to the extent that subdivision within the Urban Zone must comply with the standards set out in the COPSLUD as this provides for non-reticulated water supply for firefighting.</p>	<p>Amend as follows: Rule SUB.2 Controlled activity The matters over which Council reserves its control for Rule SUB.2 (1), (2) and (3) are: 1. The provision of services including adequate provision of on-site wastewater systems <u>and firefighting water supply</u> where required.</p>

	<u>Development Code of Practice 2023 (or its applicable successor).</u>			
4	<p>Rule SUB.2A Restricted Discretionary Activity</p> <p>Subdivision within Eweburn Zone shall be a Restricted Discretionary Activity</p> <p>The matters over which Council's discretion is restricted is as follows:</p> <p>3. Potable water and fire fighting water supply</p> <p>...</p> <p>6. Aspects outlined in Council's Subdivision, Land Use and Development Bylaw <u>Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor).</u></p>	Support	Fire and Emergency support the matters of discretion of Rule SUB.2A as Council must give consideration to firefighting water supply across matter of discretion (3) and (6).	Retain as notified.
Section 2.10 Transportation				
5.	<p>Policy TRAN.3</p> <p>Manage subdivision, land use and development to achieve integration with the transport network.</p> <p>Explanation: Careful consideration should be given to the location, nature and design of subdivision, land use and development to ensure appropriate integration with the transport network. Activities should achieve appropriate accessibility and connectivity, to and from the network.</p> <p>The New Zealand Building Code, District Plan and Southland District Council's Subdivision, Land Use and Development Bylaw 2012 <u>Subdivision,</u></p>	Support in part	<p>Fire and Emergency support in part the policy to manage subdivision, land use and development to achieve integration with the transport network.</p> <p>However, Fire and Emergency request the inclusion on the COPSLUD within the policy itself.</p>	<p>Amend as follows:</p> <p>Manage subdivision, land use and development to achieve integration with the transport network <u>in compliance with the Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor).</u></p>

Land Use and Development Code of Practice 2023 (or its applicable successor) provide guidance on this. The integration of activities and the transport network support best practice urban design. Where appropriate integration is not achieved, adverse effects on the transport network can arise.

Section 3.1 Rural Zone

6	<p>Rule RURAL.7 General Rule Standards</p> <p>All activities shall comply with the following General Rural Standards</p> <p>...</p> <p>2. Transportation Standards including access</p> <p>All activities shall comply in all aspects with the provisions set out in the Southland District Council Subdivision, Land Use and Development Bylaw 2012 <u>Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor)</u> - relating to carparking numbers, dimensions, access, loading and manoeuvring.</p>	Support in part	<p>Fire and Emergency support the provision for Transportation Standards including access to comply with the provisions set out in the COPSLUB, subject to the relief sought in Appendix 1 regarding transportation standards.</p> <p>Fire and Emergency are concerned that there is no provision for services, including firefighting water supply in accordance with the COPSLUD. Fire and Emergency request that provision within the General Rural Standards is included.</p>	<p>Amend as follows:</p> <p>8. <u>Services</u></p> <p><u>All activities shall comply in all aspects with the provisions set out in the Southland District Council Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor) – relating to firefighting water supply and other services.</u></p>
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Section 3.2 Urban Zone

7	<p>Rule URBAN.5 General Urban Standards</p> <p>All activities within the Urban Zone shall comply with the following General Urban Standards:</p> <p>...</p>	Support in part	<p>Fire and Emergency support the provision for Transportation Standards including access to comply with the provisions set out in the COPSLUB, subject to the relief sought in Appendix 1 regarding transportation standards.</p> <p>Fire and Emergency are concerned that there is no provision for services, including firefighting water supply in accordance with the</p>	<p>Amend as follows:</p> <p>16. <u>Services</u></p> <p><u>All activities shall comply in all aspects with the provisions set out in the Southland District Council Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor) – relating to firefighting water supply and other services.</u></p>
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<p>13. Transportation Standards including access</p> <p>All activities shall comply in all aspects with the provisions set out in the Southland District Council Subdivision, Land Use and Development Bylaw 2012 <u>Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor)</u> - relating to carparking numbers, dimensions, access, loading and manoeuvring.</p>	<p>COPSLUD. Fire and Emergency request that provision within the General Rural Standards is included.</p>
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Section 3.4 Industrial Zone

<p>8</p>	<p>Rule IND.4 General Industrial Standards</p> <p>All activities within the Industrial Zone shall comply with the following General Industrial Standards</p> <p>...</p> <p>10. Transportation Standards including Access</p> <p>All activities shall comply in all aspects with the provisions set out in the Southland District Council Subdivision, Land Use and Development Bylaw 2012 <u>Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor)</u> - relating to carparking numbers, dimensions, access, loading and manoeuvring.</p>	<p>Support in part</p>	<p>Fire and Emergency support the provision for Transportation Standards including access to comply with the provisions set out in the COPSLUB, subject to the relief sought in Appendix 1 regarding transportation standards.</p> <p>Fire and Emergency are concerned that there is no provision for services, including firefighting water supply in accordance with the COPSLUD. Fire and Emergency request that provision within the General Rural Standards is included.</p>	<p>Amend as follows:</p> <p>11. <u>Services</u></p> <p><u>All activities shall comply in all aspects with the provisions set out in the Southland District Council Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor) – relating to firefighting water supply and other services.</u></p>
<p>9</p>	<p>Rule FRZ.5 General Standards</p>	<p>Support in part</p>	<p>Fire and Emergency support the provision for Transportation Standards including access to comply with the provisions set out in the</p>	<p>Amend as follows:</p> <p>5. <u>Services</u></p>

All activities within the Fiordland/Rakiura Zone shall comply with the following general standards:

...

2. Transportation Standards including Access

All activities shall comply in all aspects with the provisions set out in the Southland District Council ~~Subdivision, Land Use and Development Bylaw 2012~~ Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor) - relating to carparking numbers, dimensions, access, loading and manoeuvring.

COPSLUB, subject to the relief sought in Appendix 1 regarding transportation standards. Fire and Emergency are concerned that there is no provision for services, including fire fighting water supply in accordance with the COPSLUD. Fire and Emergency request that provision within the General Rural Standards is included.

All activities shall comply in all aspects with the provisions set out in the Southland District Council Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor) – relating to firefighting water supply and other services.

Section 3.6 Eweburn Zone

<p>10</p>	<p>Eweburn Zone Guidance Information This guidance note outlines matters which should be considered or addressed in applications for resource consents within the Eweburn Zone.</p> <p>...</p> <p>3. Access and Road Design Access and Roding design shall be in accordance with Council's Subdivision, Land Use and Development Bylaw 2012 <u>Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor)</u>. Further, consideration shall be given to:</p>	<p>Support in part</p>	<p>Fire and Emergency support in part the updating of the reference to the SDC COPSLUD within respect to access and road design.</p> <p>However, the use of notes with respect to access and road design instead of inclusion into rules that are enforceable under the district plan poses a risk to Fire and Emergency in that the COPSLUD may not be adequately enforced under the RMA. As a result, access and road design may be developed to a standard that is not suitable for fire appliances.</p> <p>Therefore, Fire and Emergency request that reference to the COPSLUD for access and road design is embedded into a rule itself.</p>	<p>Amend as follows:</p> <p>Rule EWB.8 – Performance Standards The following Performance Standards shall apply in the Eweburn Zone</p> <p>...</p> <p>13. <u>Access and Roding design shall be in accordance with Council's Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor).</u></p>
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Section 5.6 Edendale Dairy Plant Industrial Development Concept Plan

<p>11</p>	<p>2.5 Additional Performance Standards 2.5.1 Access Any new access that exceeds the minimum access standards set out in the Southland District Council Subdivision, Land Use and Development Bylaw 2012 <u>Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor)</u> shall be subject to approval by the relevant Road Controlling Authority. Should approval be granted, the district-wide access provisions may be waived if the relevant Road Controlling Authority considers that a proposed alternative design would avoid an unnecessary expense on the applicant or that the proposed alternative design is necessary to ensure that any adverse effect on the environment would be minor.</p>	<p>Support in part</p>	<p>Fire and Emergency support the provision for Access within the Edendale Dairy Plant Industrial Development Concept Plan to comply with the provisions set out in the COPSLUB, subject to the relief sought in Appendix 1 regarding transportation standards. Fire and Emergency are concerned that there is no provision for services, including firefighting water supply in accordance with the COPSLUD. Fire and Emergency request that provision within the Additional Performance Standards is included for the Edendale Dairy Plant Industrial Development Concept Plan.</p>	<p>Amend as follows: 2.5 Additional Performance Standards: 2.5.3 <u>Services</u> <u>All activities shall comply in all aspects with the provisions set out in the Southland District Council Subdivision, Land Use and Development Code of Practice 2023 (or its applicable successor) – relating to firefighting water supply and other services.</u></p>
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