


Submission on Publicly Notified Proposal for Policy Statement or Plan or Plan Change

[Form 5 under Resource Management (Forms, Fees and Procedures) Amendment Regulations 2006 - Clause 6 of the First Schedule, Resource Management Act 1991]

SUBMISSION TO SOUTHLAND DISTRICT COUNCIL
Enter details
Name of Submitter: (Full Name)
Albie Ford on behalf of WSP New Zealand Ltd
This is a submission on the following proposed plan change: [name of proposed or existing policy statement or plan]
Plan Change – Subdivision, Land Use, and Development Code of Practice, 2023
The specific provisions of the proposal that my submission relates to are: [give details]
Changes (updating references) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 – Section 2.6 Subdivision Introductions (2 changes), Policy SUB.6 (3 changes), Rule SUB.1 (2 changes), Rule SUB.2 (2 changes), Rule SUB.2A (1 changes).
Change 11 – Section 2.9 Energy, Minerals, and Infrastructure Rule INF.1(3)
Change 12 – Section 2.10 Transportation Policy TRAN.3
Change 13 – Section 2.14 Financial Contributions Rule FIN.1 General rule B.1(8)

SUBMISSION TO SOUTHLAND DISTRICT COUNCIL
Change 14 – Section 3.1 Rural Zone Rule RURAL.7(2)
Change 15 – Section 3.2 Urban Zone Rule URB.5.13
Change 16 – Section 3.4 Industrial Zone Rule IND.4(10)
Change 17 – Section 3.5 Fiordland/Rakiura Zone Rule FRZ.5(2)
Change 18 –Section 3.6 Eweburn Zone Rule EWB.8(3)
Change 19 – Section 5.6 Edendale Dairy Plant Industrial Development Concept Plan. Section 2.5.1

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<p>My submission is:</p> <p>[include—</p> <ul style="list-style-type: none"> • whether you support or oppose the specific provisions or wish to have them amended; and • reasons for your views] 	
<p>WSP supports the use of a Code of Practice to manage infrastructure and development in Invercargill and Southland.</p> <p>We seek a number of changes to the Code of Practice to fix errors and provide clarity to industry. Refer to the attached Spreadsheet with details of proposed changes.</p>	
<p>I seek the following decision from the local authority:</p> <p>[give precise details]</p> <p>Refer to spreadsheet attached.</p>	
<p>Please indicate:</p> <p>I wish <input checked="" type="checkbox"/> or, I do not wish <input type="checkbox"/> to be heard in support of my submission.</p> <p>If others make a similar submission, I will consider presenting a joint case with them at a hearing: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Will you gain an advantage in trade competition from this submission Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If you answered <u>yes</u> to gaining an advantage in trade competition, does your submission relate to the adverse effects of the plan change on the environment? Yes <input type="checkbox"/> No <input type="checkbox"/></p>	
	<p>31/5/2023</p>
<p>Signature of submitter <i>(or person authorised to sign on behalf of submitter)</i></p>	<p>Date <i>(a signature is not required if you make your submission by electronic means)</i></p>
<p>Enter details</p> <p>Contact person: [name and designation if applicable]</p> <p>Albie Ford</p>	

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Note to person making submission
<p>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(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.</p> <p>Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):</p> <ul style="list-style-type: none"> • It is frivolous or vexatious; • It discloses no reasonable or relevant case; • It would be an abuse of the hearing process to allow the submission (or part) to be taken further; • It contains offensive language; • It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Section	Section name	Page	Comment	Proposed Change
All			In general there are numerous reference errors throughout. These are assumed to be identified during a final review. Need to add more clarity here. There has been issues in the past where RCAs have misinterpreted the overlap between the BA and CoP. For example if stormwater laterals have been installed as part of a subdivision which meet the CoP then NZBC E1 does not overrule this as it is essentially an acceptable solution under the BA. In addition, some RCAs have requested building consents for services as part of a subdivision, even when excluded by the BA.	Final version will not have errors.
1.4	Relationship with Building Act	11		Add clarity for interface between Building Act and CoP with precedence.
2.1.1	Local Planning Documents	13	Environment Southland regional Council - Regional Plans - Spelling and name error	Environment Southland (Southland Regional Council) - Regional Plans
2.2.6	Legislation	18	Health and Safety in employment act 1992 has been replaced. Very vague statement with large implications. Not a requirement for treatment. Appears that Council want developers to treat stormwater before being discharged into existing network which will likely have untreated stormwater. Should rely on the rules of the regional plan. Why not end source treatment at larger level?	Review all standards and legislation. Consider others such as privacy act. Stormwater treatment devices 'may' be required. The need for treatment devices shall be considered for every discharge even when it is not a direct discharge to a receiving water, for instance where the discharge is to an existing network
3.2.4.5	Water Quality	28		Need Horizontal Datum as well as requirements for GIS as can be different to what is used by industry.
3.2.5	Datum and Coordinate Systems	31	No Horizontal Datum for either council. NZGD 2000 is common for survey but NZTM is common for GIS.	
3.2.20	Asset Handover Process	37	Hard copy as-built drawings are provided. Waka Kotahi will roll out a national RAMM database guideline in late 2022. Council will be adopting the updated national RAMM database guideline as a minimum requirement plus any other Council specific requirements.	Hard copies are now redundant in industry. Electronic should be standard
3.2.20.2	Roads	39		Update
Table 3.1	Test Requirements for roads	39	2x Crushing and Weathering for each source.	1 test per source up to 48 months old.
Table 3.1	Concrete K&C and Footpaths	39	Slump test required	Slump is a field test. The coordinate system for uploading into GIS isHorizontal Datum andVertical datum
3.2.20.3	3 Waters	40	Need to clarify coordinate system i.e. NZTM Full as-built documentation is to be submitted for all infrastructure, whether on Council projects, private developments or Waka Kotahi NZ Transport Agency (Waka Kotahi (NZTA)) work.	
3.2.20.9	As Built Drawings	43	Except for minor works, all As-built plans are to be prepared under the supervision and certified as to accuracy by a Licensed Cadastral Surveyor.	Clarity needed here. Does this apply to Tiwai, SouthPort, Fonterra, Alliance. What about SDC projects. As built are not common in pavement rehabilitations for example.
3.2.20.9	As Built Drawings	43		Not required. Engineering surveyors are more suited to this task.
3.2.20.9	As Built Drawings	43	The documents are to be prepared in a format suitable for downloading into Council's GIS.	Not defined. The coordinate system for uploading into GIS isHorizontal Datum andVertical datum. What file types?
3.2.20.9	As Built Drawings	43	Plan Prints The coordinate system shall match that used by the Council GIS (GD 2000). Need to confirm. GD 2000 is not common wording and	Hard copy plans are not standard in industry and should be digital only. The coordinate system for uploading into GIS isHorizontal Datum andVertical datum
3.2.20.9	As Built Drawings	44	normally NZTM	
3.2.20.9	As Built Drawings	44	Reference to 'Level', should be 'layer'	
Table 5.4	Road Design - Cross Sections	67	2 x footpaths for Urban residential Streets	Give options for 1 large shared path rather than 2 small footpaths
5.3.4	Pavement Structural Design	68	Pavement Design of 30 years is more than Waka Kotahi standards which is for 25 years A selection of tests shall be taken at 150, 300, and 450 mm below final subgrade level. Need to be clear that results from deep within the subgrade is for information only. The first 50mm of the subgrade is the most important. Also note that the roading team have specified 20th percentile for pavement rehabilitation designs	Move to 25 year design life.
5.3.4.2	California Bearing Ratio Tests	68		A selection of tests shall be taken at 150, 300, and 450 mm below final subgrade level and included with the reporting.
5.3.20.4	Under Kerb drainage	81	Typical subsoil detail does not meet safety in design and cannot be replaced without removing kerb. Benkelman beam testing is a relatively old technology with only one supplier in Southland. Deflection testing is not always appropriate	Use best practice detail.
5.4.9	Deflection Testing	91	for compliance as pavements can have high deflections and meet their design life. No real mention of Tactile service ground indicators. These are very important for people who are blind or have low vision. Very few successful implementations within Southland. Suggest more guidance is added that is above and beyond the minimum to upskill council staff and practitioners	Suggest use for information only for larger developments and FWD preferred.
5.4.12	Footpaths and Cycle paths	92		As per comment
5.4.12	Footpaths and Cycle paths	92	665 mesh is not commonly used anymore as it is non-ductile consider changing to improve availability Asphalt concrete paths shall be edged with either concrete or ground treated timber where abutting berms or other grassed areas.	Change to SE72
5.4.12.2	Asphaltic concrete	92		Not required. Timber edging adds cost and gets broken by mowers anyway.
5.4.13	Reinforcing	93	665 mesh is not commonly used anymore as it is non-ductile consider changing to improve availability Suggest liaison with ES regarding constructed wetlands and how regional rules would be affected by CoP. Need to be very clear that constructed wetlands can be legally be maintained. We need to make sure that rules in place meant to protect wetlands wont limit construction and maintenance of wetlands for stormwater treatment..	Change to SE72
6.2.2	Stormwater - wetlands	99		Constructed wetlands could create unintended consequences with regional water plan and ES needs to be consulted now rather than individual developers needing to deal with ES later.
6.2.6	Catchment and offsite effects	101	Reference NES freshwater which relates to culverts for fish passage. Need to fix this section. 2050 is irrelevant when SW assets are to last longer than 27 years (See 6.3.1 which requires 100 year design life). RCP 6 and 1.5 degree increase contradict one another. Design duration of 6hrs is vague and not relevant to most SW design.	Add reference to NES and add to standard section.
6.2.8	Climate Change	101	Overall this is a copy paste from a number of sources. Example is poor. Suggest ICC consult separately with community regarding the 20% AEP decision. Not in line with the rest of the country and suggest that ratepayers are unaware of the risk that ICC has decided on their behalf.	Use RCP6.0 and HIRDS. Remove incorrect statements. Move to 10% AEP. Likely to change with 3 waters reform anyway so may as well start now.
6.3.4	System Design	102	NZBC E1 is inappropriate and conservative for many cases for pipe flow. There has been issues with Council staff relying on this method particularly building departments and ignoring engineering calculations. In general NZBC for private land and CoP for assets to be vested with council.	Consult with community.
6.3.5	Design Criteria	103	Remove intensity and discharge calculations. Intensity is provided in HIRDS and does not allow for climate change. If Engineers cannot use rational method then they shouldn't be submitting stormwater designs.	Remove reference to NZBC E1
6.3.5	Design Criteria	104		Remove intensity and discharge calculations.
6.3.6.3	Hydraulic Design of Stormwater Systems	105	Add - Approximations of Colebrook-White are also able to be used. Implies designers can design for pressurised networks under design flow rather than the more typically used open channel conditions.	Add - Approximations of Colebrook-White are also able to be used.
6.3.6.5	Determination of surface water profiles	106	i.e. can surcharging be used in design for standard 10/20% AEP design flow?	Pipe designers shall ensure pipes are not surcharging under design flows.

6.3.10.9	Subsoil drains	Subsoils to NZTA F/2 - Note that only Nexus-Hiway comply with this requirement which is not perforated all around the pipe section. 114 While used by NZTA this is not common pipe and is often installed upside down by contractors which severely limits inflows. Reference CCPA guidelines for manhole sizing based on inlet and outlet pipe diameters and angles. Need to add comments about distance above and below risers at penetration. Issues in Southland and Invercargill where contractors use risers that are too short and	Suggest review of this section so standard smooth bore perforated subsoil drains can be used.
6.3.11.3	Size of manholes	115 the structural capacity is affected which will affect design life.	Need to add comments about distance above and below risers at penetration
7.3.6.9	Marking tape	127 No Marking tape required for SW? Is required on FS	Review marking tape requirements
7.3.8.4.4	Internal Falls Through MHs	132 Less detail than old CoP. What is the reason for this? Need drops for various pipe deflection angles Propose to have laterals come off the main parallel and then curve to Lot. This was an issue in Christchurch and other places and is now standard in other parts of the country. Any movement of the main can pop off the saddle causing extensive leakage after an	Add drops over manhole details back in.
8.3.10.1	Seismic design	152 earthquake.	Edit details.
8.5.6	Discharge of Testing Water	164 Only one regional council. Make a decision. Will or wont this need consent.	Liaise with ES.
9.6	Positioning of Lateral Connections	182 1000mm cover of storm and sewer laterals mentioned elsewhere. Contradiction. The 5 year maintenance period (10.4.1) for landscaping reduces costs to SDC. Landscaping is established when handed over. Developments should not be restricted as to how much landscaping they provide due to the benefits they provide. Particularly	Change to be consistent
10.2.1	Approval - Landscaping	184 when combined with stormwater management or reserves. Section 10.2.4 reinforces this view.	If landscape infrastructure proposed is over and above the minimal level of service, Council has to agree to the increase in cost.
10.3.1	Location - Trees	185 Consider adding root barriers to tree pits. Crime prevention through urban design indicates that fences bordering reserves and walkways should have limits on fence heights. i.e. 1.2m. Consider the walkways around Glengarry where paths are unlit with high fences either side. This could occur under the	Add option for root barriers and where to be used. i.e. CBD
10.3.9	Fencing of reserves	187 proposed CoP	Add fence height limits near reserves
10.4.5	Mulch	189 Mulch should be aged. Fresh mulch will draw nitrogen out of the soil which can affect plant/soil health. Refer to NZTA P39	Add note about not using mulch less than 3 months old.
	Drawings	Electronic drawings in .dwg format should be available to all consultants. Refer to Christchurch City Council	Provide .dwg drawings to suppliers.
	D3	6.3.12 states stormwater pegs to be painted blue but D3 has green Why not have precast base and riser which is the most commonly used type of MH. Rungs in MH's contradict CoP. Should have larger MH's rather than trying to make things work with with insitu concrete. Cement is toxic and potential for accidental discharge into waterways (Stormwater).	Decide on paint colour. Prefer green.
	D12-D21		Consider use of rungs. Better to have for rescue than not. Needs full risk assessment. Precast options should be available particularly for smaller pipe diameters.
	R5	Kerbs are different to local contractors molds so wont match existing kerb profiles. Error in last Bylaws that has been carried thorough.	Refer to the kerbies molds
	R7	Kerbs are different to local contractors molds so wont match existing kerb profiles. Error in last Bylaws that has been carried thorough.	Refer to the kerbies molds
	R8	Kerbs are different to local contractors molds so wont match existing kerb profiles. Error in last Bylaws that has been carried thorough.	Refer to the kerbies molds
	R13 & R13A	Back entry only, grated only and combination back and grated entry refered in 5.3.20.8 but only detailed for combination and yard sumps. Colour Resene Erode Claret is old ICC maroon. Should this be white or yellow? Relective tape needed for night time visibility. Specify	Need to add standard drawings for grated only as well as back entry only.
	R26	tape colour. Lots of combinations around ICC and SDC need standard going forward. Farmtuff does not come in 200mm and is also not UV resistant or rated for reduced cover so cracks. Should be DN225 twin walled	Update detail. Provide differentiation between cyclist and ped grab rails.
	R28A	corrugated and UV stabilised with carbon black.	Update detail
	W6	No longer used. Refer to W20.	Update detail
	W20	Come off main parallel rather than perpendicular for seismic resilience	Update detail