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ICC Plan Change 2 Hearing Panel
Invercargill City Council
Private Bag 90104
Invercargill, 9840

14 May 2026

Sent via email to: cat.manera@icc.govt.nz

Dear Hearing Commissioners,

Fire and Emergency New Zealand – Letter to be tabled for Plan Change 2 Hearing

Fire and Emergency New Zealand (**Fire and Emergency**) made a submission on Plan Change 2: Housing and Code of Practice (**PC2**) to the Invercargill District Plan (**IDP**).

Fire and Emergency sought the following broad areas of relief:

- that ICC’s minimum access way design standards provide for emergency services access;
- all new reticulated water supply connections sought via both land use and subdivision consent applications are required to comply with The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (**SNZ PAS 4509:2008**) under the IDP.
- inclusion of an appropriate matter of discretion for the consent authority as decision makers to ensure that the capacity of the reticulated water supply network is sufficient to provide for new development before the granting of resource consent for such development;

This letter responds to the Section 42A Report and supporting evidence from ICC’s Engineering Manager and is in lieu of Fire and Emergency’s attendance at the PC2 hearing.

Access matters

In the context of the intensification that would be enabled under PC2, Fire and Emergency’s submission raised concerns regarding the minimum accessway standards in the IDP. It is understood that the roading standards under the IDP are being wholly superseded by the road design standards in ICC’s Code of Practice as part of PC2. ICC’s Engineering Manager states that these standards are based on emergency service vehicle requirements.

Fire and Emergency has undertaken a review of the standards, as set out in Table 5-4 of the Code of Practice. It is noted that private rights of way serving up to six dwellings must have a minimum carriageway width of 3m, and a minimum legal width of 3.5m. It is anticipated that the development enabled by PC2 has the potential to result in an increased number of new dwellings being served by private rights of way. Whilst Fire and Emergency would prefer a minimum width of 4m to enable an efficient emergency response, a minimum legal width of 3.5m would be workable. On this basis, no further relief is sought in relation to emergency access matters.



Water supply matters

Whilst there is no explicit requirement within the IDP provisions for residential land use and subdivision activities enabled under PC2, to comply with SNZ PAS 4509:2008, ICC's Engineering Manager has advised that all new reticulated connections for both land use and subdivision consents must go via ICC's Engineering Approval Process, which requires compliance with Council's Code of Practice. As Council's Code of Practice requires all reticulated connections to achieve compliance with SNZ 4509:2008, Fire and Emergency consider this matter to be appropriately addressed.

The Section 42A Officer and Engineering Manager agree with Fire and Emergency's position that development should not precede without necessary upgrades to Council's reticulated water network, where capacity has been found to be inadequate to service urban growth. On this basis, the Section 42A Officer recommended acceptance of the related relief sought by Fire and Emergency and proposes an amendment to existing matter of discretion RES1AZ-R7(2) to ensure appropriate consideration is given to the capacity of existing infrastructure to inform decision making.

On this basis, Fire and Emergency supports the recommendation by the Planning Officer.

Should you have any queries or seek clarification on the above, please contact me using the details below.

Yours sincerely,



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Planner

on behalf of

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