

 <p><b>TIMARU</b> DISTRICT COUNCIL Te Kaunihera ā-Rohe o Te Tihi o Maru</p>	<p><b>Form 13</b></p> <p><b>Submission on Application Concerning Resource Consent or Esplanade Strip that is Subject to Public Notification or Limited Notification by Consent Authority</b></p> <p><i>Sections 41D, 95A, 95B, 95C, 127(3), 136(4), 137(5)(c), and 234(4) Resource Management Act 1991</i></p>	<p><b>Resource Consent No</b></p>
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To: Timaru District Council

Name of Submitter: Fire and Emergency New Zealand [full name]

This is a submission on an application from: Yedo Investments Limited [name of applicant]  
for a resource consent (or for a change or cancellation of a condition of a resource consent or for a variation or cancellation of an instrument creating an esplanade strip).

Briefly describe the type, proposed/existing activity, and location of the resource consent:  
Subdivision consent (101.2025.199.1) and Land Use Consent (102.2025.199.1) at 44 Gresham Street, Geraldine and will include 25-rural residential allotments over two stages.

[Briefly describe

- if an application for a resource consent, the type, proposed activity, and location of the resource consent:
- if an application for a change or cancellation of a condition of a resource consent, the type and location of the resource consent, the relevant condition, and any proposed change:
- if an application for a variation or cancellation of an instrument creating an esplanade strip, a description of the strip and its location and any proposed variation.]

I ~~am~~ **am not**\* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.  
\*Select one.

\*I ~~am~~ **am not**† directly affected by an effect of the subject matter of the submission that—

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

\*Delete this paragraph if you are not a trade competitor.  
†Select one.

The specific parts of the application that my submission relates to are: [give details]

Please refer to PDF attached for submission points

Please attach additional sheets as required

My submission is: [Include:

- whether you support or oppose the application or specific parts of it:
- whether you are neutral regarding the application or specific parts of it:
- reasons for your views].

Please refer to PDF attached for submission points

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Please attach additional sheets as required

I seek the following decision from the territorial authority: *[give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]*

Please refer to PDF attached for submission points

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.....  
.....

Please attach additional sheets as required

I **wish** / ~~or do not wish~~\* to be heard in support of my submission.

\*Select one.

\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.

\*Delete if you would not consider presenting a joint case.

I ~~request~~ **do not request**\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

\*Select one.

*A O'Sullivan*

Signature of submitter (or person authorised to sign on behalf of submitter)

27/01/2026

Date

(A signature is not required if you make your submission by electronic means).

ANZ Centre 267 High Street,  
Christchurch Central City

Electronic address for service of submitter: .....

Telephone: +64 (3) 3743199 .....

Postal address (or alternative method of service under section 352 of the Act): ...ANZ Centre 267 High Street,  
Christchurch Central City

Contact person ..... Arlia O'Sullivan

(name and designation, if applicable)

**Note to submitter:**

- If you are making a submission to the Environmental Protection Authority, you should use form 16B.
- The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.
- You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
- If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.
- If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.
- 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):
  - 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 the 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.



### Firefighting Water Supply

It is acknowledged that the applicant is proposing to service the subject site through an extension of the public reticulated network. The application states that four options are being considered, one of which may require on-site tanks for firefighting as a supplementary supply to the reticulated network. Whilst the final water servicing arrangements are not intended to be confirmed under the engineering approval stage, it is noted that a condition is proposed to ensure that the eventual water supply design will accord with the requirements of the Timaru Infrastructure Design Standards ('TIDS'). The TIDS requires water supply reticulation for the eventual subdivision to comply with the Code of Practice. It is noted that the TIDS also states that where a development is unable to be connected to water supply reticulation in the first instance, the water supply is to comply with an alternative firefighting water source outlined in the Code of Practice. It is assumed that this requirement also extends to scenarios which seek to provide for firefighting via a combination of reticulated water and on-site supplies. Accordingly, the proposed related consent condition and reference to the TIDS appears to adequately provide for firefighting water supply. Fire and Emergency does however seek confirmation that the eventual firefighting water supply to serve the subdivision, in any of the water supply options identified by the applicant, will be required to comply with the Code of Practice.

### Emergency Vehicle Access

F5-02 GD provides guidance to ensure building designs comply with the New Zealand Building Code C5 – Access and safety for firefighting operations, Clause C5.6.

To accommodate Fire and Emergency vehicles, F5-02 states that carriageways should have a minimum width of 4m and minimum height clearance of 4m. The width of a road can be reduced to a minimum width of 3.5m provided no tight turns are required. For curved sections, a minimum clear width of 4m between inner and outer arcs is required for pump appliances, and 7.3m for aerial appliances. F5-02 also states that accessways maintain a preferred maximum gradient of 1:8 (12.5%), with an absolute maximum of 1:5 (20%). The maximum fire hose run distance allowed under the Building Code is 75m. Accordingly, any accessway which does not enable appliance access, must be no more than 75m in length measured from the road boundary to the further point of any proposed building platform. This provides for situations where a fire may be at the rear of a building or the only access to a building is from the rear elevation.

The main proposed access to the new allotments will be via a single access road served from Gresham Street and Huffey Street at each end. The road will comprise a 7m wide, two-way carriageway. Huffey Street is also proposed to be upgraded to provide for a 6m wide carriageway. Due to land topography, approximately 25,000m<sup>3</sup> of earthworks are required to form the main internal access road to ensure that the carriageway has a suitable gradient. The application is supported by cross sections which shows the gradient of the road to be no more than 12.5%. On this basis, the main access road for the subdivision appears to be adequate to provide for emergency access.

However, three of the proposed lots (Lots 2 to 4) are intended to be served from a private right of way (ROW) off the internal access road. The final design of the ROW including maximum length and gradient, and the minimum width, are currently unknown. Neither is it understood at this stage whether the proposed hydrant layout will extend beyond the main access road and into the ROW.

A condition is proposed by the applicant which states that the roading for the subdivision shall comply with the TIDS. The TIDS requires roads to be constructed as per the roading hierarchy requirements of the Timaru Operative District Plan ('ODP'). Under the ODP, private access roads in the Rural Zone serving up to seven dwellings shall have a minimum width of 3m. The gradient of the accessway shall be formed to a grade up to 1 in 5 (20%). These minimum requirements would be insufficient for Fire and Emergency to access units served from the ROW and would require appliances to respond to an emergency from an area of hardstanding on the main road. Furthermore, the ODP does not appear to stipulate any maximum length for ROWs. Excessive ROW lengths

present further accessibility issues for Fire and Emergency in that they may hinder an efficient emergency response such as the set up of fire hoses and the use of ladders. In some cases, ROWs may exceed the maximum fire hose run distances. For Fire and Emergency to be able to respond to a fire emergency effectively, it is essential that private accessways provide adequate access and egress for emergency service vehicles, equipment and personnel, as well as the evacuation and/or rescue of residents.

In summary, Fire and Emergency is concerned that the eventual ROW may be insufficient for emergency access requirements. Subject to the final length of the ROW, there is also a danger that the ROW may exceed maximum hose run lengths. This could result in delayed emergency operations and compromised safety for residents and property.

**Fire and Emergency seeks the following decision from the consent authority:**

As set out above, Fire and Emergency is concerned that the eventual design of the ROW may not adequately provide for essential emergency access requirements.

If the consent authority is minded to grant resource consent, Fire and Emergency requests that a condition be included on the consent, by way of a consent notice, that requires the final ROW to be designed in accordance with the Designers' guide to Firefighting Operations: Emergency Vehicle Access Guide F5-O2. This requirement would align with the TIDS, which recommends that private accessway design meets the guidance outlined in this document. The condition could read (or words to a similar effect):

- *The private right of way serving Lots 2 to 4 (inclusive) shall be designed and constructed to meet the access requirements of the Designers' guide to Firefighting Operations: Emergency Vehicle Access Guide F5-O2.*

Alternatively, the applicant should confirm the final ROW design, including carriageway width, length and gradient to allow Fire and Emergency to review the design and establish whether the accessway will meet operational requirements, prior to the consent application being determined. Subject to the design being meeting access requirements, an appropriate condition should then be imposed to ensure that the ROW, as constructed, will comply with this design.

As previously highlighted, Fire and Emergency also seek confirmation that the infrastructure condition proposed by the applicant will ensure that the final water supply design will be required to comply with the Code of Practice with respect to firefighting water supply.

Fire and Emergency would welcome any questions or further engagement on matters raised within this submission. If desired by the applicant, Beca is happy to arrange a meeting between the applicant and the appropriate local Fire and Emergency contact. Please contact Arlia O'Sullivan in the first instance via the contact details supplied.

**Fire and Emergency wishes to be heard in support of its submission.**

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



Arlia O'Sullivan, Planning consultant

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

**Date:** 27/01/2026

