



Level 2, 15 Porowini Avenue,
WHANGAREI,
0110, New Zealand
T: // F:
E: info@beca.com // www.beca.com

Far North District Council
C/o Kenton Baxter

22 September 2025

Via Email

Far North District Council - District Plan

Dear Kenton,

Letter to support amendments - FNDC DP

My name is Thomas Kiddle. I hold the qualification of a diploma in Civil Engineering – NZDE. I have 11 years' experience as a Civil Engineer. For over two years of this time, I was seconded as a Development Engineer to Whangarei District Council. In this role I assessed many subdivision applications against the District Plan, the Engineering Plan Approval process and I was involved in construction monitoring.

Scope

I have been engaged by FNDC to support the change in approach to the District Plan of removing direct reference to Engineering Standards in plan provisions.

I have reviewed the proposed amended provisions related to engineering matters for the Subdivision provisions, specifically provisions SUB-R1, SUB-R2, SUB-R3, SUB-R5, SUB-S4, and SUB-S5.

Generally, the following relevant relief and amendments have been sought via submissions S521.007, S529.053, S521.011, S215.033, S516.058, S215.034 and S516.059:

1. Remove mandatory compliance with current Council Engineering Standards unless amended to address technical errors and inconsistencies.
2. Require best-practice water-sensitive and low-impact design measures for all stormwater and wastewater engineering infrastructure to address future extreme rainfall events.

Recommendation

I have recommended the decoupling of the rules and standards with the Engineering Standards alongside the addition of certain standards and matters of control/discretion within the relevant rules as appended (Appendix A) to directly and indirectly address the relief sought. This approach is consistent with other chapters heard so far.

While the recommended provisions have removed reference to the Engineering Standards, the management of these effects remains important. Relevant matters within the Engineering Standards have been incorporated into the proposed changes in Appendix A, specifically SUB-S4 and SUB-S5. In proposing these changes, I have also reviewed and applied the approach of the Whangārei District Plan, which has adopted a similar approach.



Regarding the submission points on water sensitive and low-impact design, in my opinion this does not need to be specified in the planning provisions. The change to remove reference to the Engineering Standards and refer instead to performance specifications, enables these design solutions to be used.

In my engineering opinion, these provisions provide for the flexible approach sought to remove reference to a static document while continuing to safeguard environmental and human health risks through three waters management associated with land development.

Yours sincerely



Thomas Kiddle

Associate Civil Engineer

on behalf of

Beca Limited

Phone Number: +64 21 088 60094
Email: thomas.kiddle@beca.com

Appendix A- Amended Provisions

SUB-R1	Boundary adjustments	
All zones (except Open Space zones, Motorua Island zone, and Airport zone)	<p>Activity status: Controlled</p> <p>Where:</p> <p>CON-1</p> <p>1. The boundary adjustment complies with standards: SUB-1 Minimum allotment sizes for controlled activities, except where an existing allotment size is already non-compliant, the degree of non-compliance shall not be increased; SUB-S2 Requirements for building platforms for each allotment; SUB-S3 Water supply; SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose;</p> <p>CON-2</p> <p>1. the boundary adjustment does not alter:</p> <p>i. the ability of existing activities to continue to be permitted under the rules and standards in this District Plan;</p> <p>ii. the degree of non compliance with zone or district wide standards;</p> <p>iii. the number and location of any access; and</p> <p>iv. the number of certificates of title.</p> <p>CON-3</p> <p>1. The boundary adjustment complies with standard: SUB -S8 Esplanades.</p> <p>Matters of control are limited to:</p> <p>a. the design and layout of allotments, and the ability to accommodate permitted and/or intended land uses;</p> <p>b. the provision of easements or registration of an instrument for the purpose of public access and reserves;</p> <p>c. the effects of development phase works on the surrounding area;</p> <p>d. extent of potential effects on sites and areas of significance to Māori,</p>	<p>Activity status where compliance not achieved with CON-1: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <p>a. matters of any infringed standard; and</p> <p>b. any relevant matters of control.</p> <p>Activity status where compliance not achieved with CON-2 and CON-3: Discretionary</p>

	<p>ancestral lands, water, site, wāhi tapu and other taonga;</p> <p>e. adverse effects on areas with historic heritage and cultural values, natural features and landscapes, wetland, lake and river margins, natural character or indigenous biodiversity values including indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification system lists;</p> <p>f. natural hazards or geotechnical constraints; <u>and</u></p> <p>g. where relevant compliance with Far North District Council Engineering Standards April 2022;</p> <p>h. adverse effects arising from land use incompatibility including but not limited to noise, vibration, smell, smoke, dust and spray.</p> <p>NOTE: If a resource consent application is made under this rule on land that is within 500m of the airport zone, the airport operator will likely be considered an affected person for any activity where the adverse effects are considered to be minor or more than minor.</p>	
<p>Natural Open Space zone</p> <p>Open Space zone</p> <p>Sport and Active Recreation zone</p> <p>Motorua Island zone</p> <p>Airport zone</p>	<p>Activity status: Non-complying</p>	<p>Activity status where compliance not achieved: Not applicable</p>
<p>SUB-R2</p>	<p>Subdivision of land solely to create an allotment that is for the purpose of public works, infrastructure, reserves or access</p>	
<p>All zones</p>	<p>Activity status: Controlled</p> <p>Matters of control are limited to:</p>	

	<div><div><div>a. the size, design and layout of lots for the purpose of public works, infrastructure, reserves or access;</div><div>b. the provision of easements or registration of an instrument for the purpose of public access and reserves;</div><div>c. the effects of development phase works on the surrounding area;</div><div>d. the effects on cultural values;</div><div>e. preservation of the natural character of the coastal environment and the margins of lakes, rivers and wetlands;</div><div>f. protection of natural features/landforms, waterbodies, indigenous vegetation, indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification system lists, historic heritage, sites of significance to tangata whenua, archaeological site or identified feature;</div><div>g. natural hazards or geotechnical constraints;</div><div>h. where relevant compliance with Far North District Council Engineering Standards April 2022;</div><div>i. effects on notable trees within or adjoining the site; and</div><div>j. adverse effects arising from land use incompatibility including but not limited to noise, vibration, smell, smoke, dust and spray.</div></div><div><div>NOTE:</div><div>If a resource consent application is made under this rule on land that is within 500m of the airport zone, the airport operator will likely be considered an affected person for any activity where the adverse effects are considered to be minor or more than minor.</div></div></div>	
SUB-R3	Subdivision of land to create a new allotment	
<div><div>Rural Production</div><div>Rural Lifestyle</div><div>Rural Residential</div></div>	<div><div>Activity status: Controlled</div><div>Where:</div><div>CON-1</div><div>1. The subdivision complies with standards: SUB-S2 Requirements for building platforms for each allotment; SUB-S3 Water supply; SUB-S4 Stormwater management;</div></div>	<div><div>Activity status where compliance not achieved with CON- 1: Restricted Discretionary</div><div>Matters of discretion are restricted to:</div><div><div>a. matters of any infringed standard; and</div><div>b. any relevant matters of control.</div></div></div>

<div>General Residential zone</div> <div>Kororāreka Russell Township zone</div> <div>Settlement zone</div> <div>Mixed Use zone</div> <div>Light Industrial zone</div> <div>Heavy Industrial zone</div> <div>Horticulture zone</div> <div>Horticulture Processing zone</div> <div>Hospital zone</div>	<div>SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose.</div> <div>CON-2</div> <div>1. The subdivision complies with standards: SUB-S1 Minimum allotment sizes and SUB-S8 Esplanades.</div> <div>Matters of control are limited to:</div> <div><div>a. the design and layout of allotments, and the ability to accommodate permitted and/or intended land uses;</div><div>b. the provision of easements or registration of an instrument for the purpose of public access and reserves;</div><div>c. the effects of development phase works on the surrounding area;</div><div>d. extent of potential effects on sites and areas of significance to Māori, ancestral lands, water, site, wāhi tapu and other taonga;</div><div>e. adverse effects on areas with historic heritage and cultural values, natural features and landscapes, wetland, lake and river margins, natural character or indigenous biodiversity values including indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification system lists;</div><div>f. natural hazards or geotechnical constraints;</div><div>g. where relevant compliance with Far North District Council Engineering Standards April 2022; and</div><div>h. adverse effects arising from land use incompatibility including but not limited to noise, vibration, smell, smoke, dust and spray.</div></div> <div>NOTE: If a resource consent application is made under this rule on land that is within 500m of the airport zone, the airport operator will likely be considered an affected person for any activity where the adverse effects are considered to be minor or more than minor.</div>	<div>Activity status where compliance not achieved with CON-2, Discretionary</div> <div>Where:</div> <div>DIS-1</div> <div>1. compliance with SUB-S1 Minimum allotment sizes - controlled activity is not achieved, but discretionary activity achieved</div> <div>Activity status where compliance not achieved with DIS-1:Non-complying</div>
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Orongo Bay zone	<p>Activity status: Controlled</p> <p>Where:</p> <p>CON-1:</p> <p>1. The subdivision complies with standards: SUB-S3 Water supply; SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose.</p> <p>CON-2</p> <p>1. The subdivision complies with standard: SUB-S8 Esplanades.</p> <p>CON- 3</p> <p>1. The subdivision complies with the following table:</p> <table><tr><td>Orongo Bay zone</td><td><p>1. the minimum lot sizes are:</p><ul style="list-style-type: none">• 3,000m2 (onsite sewerage disposal);• 1,000m2 (reticulated sewerage disposal);<p>2. the subdivision is part of an approved Comprehensive Development Plan; and</p><p>3. Maximum number of separate titles created shall not exceed seven.</p></td></tr></table> <p>Matters of control are limited to:</p> <p>a. Matters on control in SUB-R3.</p>	Orongo Bay zone	<p>1. the minimum lot sizes are:</p> <ul style="list-style-type: none">• 3,000m2 (onsite sewerage disposal);• 1,000m2 (reticulated sewerage disposal); <p>2. the subdivision is part of an approved Comprehensive Development Plan; and</p> <p>3. Maximum number of separate titles created shall not exceed seven.</p>	<p>Activity status where compliance not achieved with CON-1: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <p>a. matters of any infringed standard; and</p> <p>b. any relevant matters of control in SUB-R3.</p> <p>Activity status where compliance not achieved with CON-2: Discretionary</p> <p>Activity status where compliance not achieved with CON-3: Non-complying</p>
Orongo Bay zone	<p>1. the minimum lot sizes are:</p> <ul style="list-style-type: none">• 3,000m2 (onsite sewerage disposal);• 1,000m2 (reticulated sewerage disposal); <p>2. the subdivision is part of an approved Comprehensive Development Plan; and</p> <p>3. Maximum number of separate titles created shall not exceed seven.</p>			
Carrington Estate zone	<p>Activity status: Controlled</p> <p>Where:</p> <p>CON-1:</p> <p>1. The subdivision complies with standards: SUB-S3 Water supply; SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose.</p>	<p>Activity status where compliance not achieved with CON-1: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <p>a. matters of any infringed standard; and</p> <p>b. any relevant matters of control in SUB-R3.</p>		

	<p>CON-2 1. The subdivision complies with standard: SUB-S8 Esplanades.</p> <p>CON-3: 1. The subdivision is a Unit title subdivision of the accommodation units and lodge/golf club complex, as identified in the Carrington Estate Development Plan.</p> <p>Matters of control are limited to: a. Matters on control in SUB-R3</p>	<p>Activity status where compliance not achieved with CON-2: Discretionary</p> <p>Activity status where compliance not achieved with CON-3: Non-complying</p>
<p>Kauri Cliffs zone</p>	<p>Activity status: Restricted Discretionary</p> <p>Where:</p> <p>RDIS-1: 1. The subdivision complies with standards: SUB-S3 Water supply; SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; SUB-S7 Easements for any purpose;and SUB-S8 Esplanades.</p> <p>RDIS-2: 1. Subdivision of up to 60 new lots for residential (golf living) purposes, provided that: i. no lot is less than 4,000m² in area; ii. on-site treatment and disposal of wastewater is provided for; and iii. the building footprints are specified on an approved plan of subdivision.</p> <p>Matters of discretion are restricted to: a. matters of control in SUB-R3; b. the extent to which the activity may impact adversely on the unique character of the Kauri Cliffs Zone; c. the extent to which any adverse effects on areas of indigenous vegetation and habitat are avoided, remedied or mitigated; and d. the effect on adjoining activities.</p> <p>NOTE: Applications for restricted discretionary activities within the Golf living sub-zone will be treated as non notified</p>	<p>Activity status where compliance not achieved with RDIS-1: Discretionary</p> <p>Activity status where compliance not achieved with RDIS-2: Discretionary</p>

	applications provided the written approval of owners of land adjoining the lots to be subdivided has been obtained.	
Māori Purpose zone Ngawha Innovation and Enterprise Park	Activity status: Discretionary	Activity status where compliance not achieved: Not applicable
Open space zones Motorua Island zone Quail Ridge zone Airport zone	Activity status: Non-complying	Activity status where compliance not achieved: Not applicable
SUB-R5	Subdivision around an approved multi-unit development	
General Residential zone	Activity status: Controlled Where: CON-1 1. Subdivision complies with standards: SUB-S2 Requirements for building platforms for each allotment; SUB-S3 Water supply; SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose. CON-2 1. Subdivision complies with standards SUB-S1 Minimum allotment sizes - Controlled activity; and SUB-S8 Esplanades	Activity status where compliance not achieved with CON-1: Restricted Discretionary Matters of discretion are restricted to: a. matters of any infringed standard; and b. any relevant matters of control in SUB-R45. Activity status where compliance not achieved with CON-2: Discretionary Activity status where compliance not achieved with CON-3: Non-complying

	<p>CON-3</p> <p>1. The multi-unit development has already been constructed or the subdivision is proposed around a multi-unit development that has been approved by way of resource consent.</p> <p>Matters of control are limited to:</p> <ul style="list-style-type: none">a. the design and layout of allotments, and the ability to accommodate permitted and/or intended land uses;b. the provision of easements or registration of an instrument for the purpose of public access and reserves;c. the effects of development phase works on the surrounding area;d. extent of potential effects on sites and areas of significance to Māori, ancestral lands, water, site, wāhi tapu and other taonga;e. adverse effects on areas with historic heritage and cultural values, natural features and landscapes, wetland, lake and river margins, natural character or indigenous biodiversity values including indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification system lists;f. natural hazards or geotechnical constraints;g. where relevant compliance with Far North District Council Engineering Standards 2022;andh. adverse effects arising from land use incompatibility including but not limited to noise, vibration, smell, smoke, dust and spray. <p>NOTE:</p> <p>If a resource consent application is made under this rule on land that is within 500m of the airport zone, the airport operator will likely be considered an affected person for any activity where the adverse effects are considered to be minor or more than minor.</p>	
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SUB-S3 Water supply		
All zones	<p>1. All new allotments shall have the ability to connect to a safe potable water supply with a capacity that is adequate for the anticipated potential land uses;</p> <p>2. Where a connection to Council's reticulated water supply systems is available, all allotments must connect;</p> <p>3. Where a connection to Council's reticulated water systems is not available all allotments must provide a water supply system; and</p> <p>4. All new allotments must have access to sufficient water supplies for fire fighting consistent with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</p> <p>Note: This standard does not apply where the allotment is for a road, or for access purposes, or for a purpose or activity for which water supply is not necessary.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none">a. adequacy of the supply of water to every allotment, and its suitability for the likely land use;b. adequacy of water supplies, and access for fire fighting purposes; andc. the standard of water supply infrastructure installed in subdivisions, and the adequacy of existing supply systems outside the subdivision.
SUB-S4 Stormwater management		
All zones	<p>4. All allotments shall be provided, within their site area, with a means for the disposal of collected stormwater from the roof of all potential or existing buildings and from all impermeable surfaces, in such a way so as to avoid or mitigate any adverse effects of stormwater runoff on receiving environments, including downstream properties. This shall be done for a rainfall event with a 10% Annual Exceedance Probability (AEP); and</p> <p>2. All stormwater management shall be in accordance with Far North District Council Engineering Standards April 2022.</p> <p>3. <u>The primary stormwater system is capable of conveying 10% AEP design storm events without surcharge;</u></p> <p>4. <u>The secondary stormwater system is capable of conveying the 1% AEP storm event within a defined path and without</u></p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none">a. control of water-borne contaminants, litter and sediments;b. the capacity of existing and proposed stormwater disposal systems (refer also to the Council's various urban stormwater management plans and any relevant Northland Regional Council stormwater discharge consents);c. the effectiveness and environmental impacts of any measures proposed for avoiding or mitigating the effects of stormwater runoff, including low impact design principles;

	<p><u>causing undue risk or damage to persons or property;</u></p> <p>5. <u>The stormwater system will not connect or be able to overflow to the wastewater network.</u></p> <p>6. <u>The primary, secondary and attenuation systems are designed to accommodate an additional 20% for climate change.</u></p> <p>7. <u>The stormwater system is designed and constructed for an asset life of at least 50 years.</u></p>	<p>d. the location, scale and construction of stormwater infrastructure;</p> <p>e. measures that are necessary in order to give effect to any drainage or catchment management plan that has been prepared for the area;</p> <p>f. <u>Adverse effects on the surrounding environment and neighbouring properties from the collection, treatment and disposal of stormwater;</u></p> <p>g. <u>The ability of the stormwater system to ensure that the peak discharge flow rates from the site are not increased beyond the levels that exist prior to the proposed subdivision and future land uses (except in circumstances where that is not appropriate);</u></p> <p><i><u>Note:</u></i></p> <p>1. <u>Acceptable means of compliance for the provision, design and construction of infrastructure is contained within the Far North District Engineering Standards</u></p>
SUB-S5 Wastewater disposal		
All zones	<p>1. Where a connection to Council owned reticulated wastewater scheme is available, all allotments must connect; <u>and</u></p> <p>2. Where connection is not available, all allotments shall be provided with a means of <u>collecting, treating and disposing of</u> wastewater within the site area of the allotment; <u>and</u></p> <p>3. All wastewater disposal shall be in accordance with Far North District Council Engineering Standards April 2022.</p> <p>Note: This standard does not apply where the allotment is for a road, or for</p>	<p>Matters of discretion are restricted to:</p> <p>a. the method and adequacy of wastewater disposal where a Council owned reticulated system is not available;</p> <p>b. the capacity of, and impacts on, the existing reticulated wastewater disposal system;</p> <p>c. <u>Feasibility of connection to and logical extension of the existing reticulated wastewater networks;</u> and</p> <p>d. the location, capacity and environmental effects of the proposed wastewater disposal system.</p>

	<p>access purposes, or for a purpose or activity for which wastewater disposal is not necessary.</p>	<p><u>Note:</u></p> <p>1. <u>Acceptable means of compliance for the provision, design and construction of infrastructure is contained within the Far North District Engineering Standards</u></p>
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