

## Online Further Submission

<b>Further Submitters Name</b>	Brad Hedger	<b>FS309</b>
<b>Further Submitter Number</b>	FS309	
<b>Wish to be heard</b>	Yes	
<b>FS qualifier</b>	a person who has an interest in the proposal that is greater than the interest the general public has (e.g. land owner, resource user)	
<b>FS qualifier reason</b>	My whanau has had Mana Whenua for generations in the Hokianga, I've been a land owner in the far north for 30 years and professionally I am a qualified engineer specialising in Resource Management and civil engineering.	
<b>Joint presentation</b>	No	
<b>Attention:</b>	Brad Hedger	
<b>Contact organisation</b>		
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<b>Online further submitter?</b>	Yes	<b>FS309.001-.019</b>
<b>Date raw FS lodged</b>	04/09/2023 4:57pm	

## Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	SupportOppose	FS Decision requested	Reasons
FS309.1	Haigh Workman Limited	S215.052	General	General / Plan Content / Miscellaneous	Insert a new chapter to the General District-Wide Matters addressing Stormwater Management (or Impermeable Surfaces generally) including overview, objectives, policies and rules in a similar way to the section on Earthworks management	Support in part	Allow in part	There is inconsistency in the engineering standards, I support that should be clear guidelines. Reference to external standards (Auckland guidance documents ) that are not under the control of the local authority will provide gaps in our unique far north environment.
FS309.2	Kapiro Residents Association	S428.007	General	General / Plan Content / Miscellaneous	Amend PDP to require best practice water-sensitive, low-impact designs and measures for all stormwater and wastewater engineering, infrastructure and related development, to prevent problems associated with more extreme	Support in part	Allow in part	Water reuse strategies should form part of all new development along with renewable energy. These aspects should have incentives in the plan to encourage use.

rainfall events in future, including provisions to implement relevant parts of NPS-FM.

FS309.3	Reuben Wright	S178.018	General	General / Plan Content / Miscellaneous	Amend to remove reference to the Far North District Council Engineering Standards April 2022 by any rule in the Plan, but should be referred to as a matter of control or discretion where appropriate.	Support in part	Disallow in part	The new district plan references the engineering standards on a frequent basis as part of its rules. While some aspects will stand the test of time, the engineering standards should be a continuing changing document to allow for new innovation and control. An example of this is that operative plan refers to engineering standards that do not contain management of climate change as it was not considered an issue in 2004.
FS309.4	Vision Kerikeri (Vision for Kerikeri and Environs, VKK)	S521.007	General	General / Plan Content / Miscellaneous	Amend PDP to require best practice water-sensitive, low-impact designs and measures for all stormwater and wastewater engineering, infrastructure and related development, to prevent problems associated with more extreme rainfall events in future, including provision to implement relevant parts of NPS-FM>	Support in part	Allow in part	Water reuse strategies should form part of all new development along with renewable energy. These aspects should have incentives in the plan to encourage use.
FS309.5	Carbon Neutral NZ Trust	S529.053	General	General / Plan Content / Miscellaneous	Amend PDP to require best practice water-sensitive, low-impact designs and measures for all stormwater and wastewater engineering, infrastructure and related development, to prevent problems associated with more extreme rainfall events in future, including provision to implement relevant parts of NPS-FM>	Support in part	Allow in part	Water reuse strategies should form part of all new development along with renewable energy. These aspects should have incentives in the plan to encourage use.
FS309.6	Kapiro Conservation Trust	S443.007	General	General / Plan Content / Miscellaneous	Amend PDP to require best practice water-sensitive, low-impact designs and measures for all stormwater and wastewater engineering, infrastructure and related development, to prevent problems associated with more extreme rainfall events in future, including provisions to implement relevant parts of NPS-FM.	Support in part	Allow in part	Water reuse strategies should form part of all new development along with renewable energy. These aspects should have incentives in the plan to encourage use.

FS309.7	Ngā Tai Ora - Public Health Northland	S516.034	General	General / Plan Content / Miscellaneous	Amend the relationship of the District Plan to the Environmental Engineering Standards to: <ul style="list-style-type: none"> <li>1. Ensure the District Plan requires the delivery of infrastructure in a manner that achieves sustainable, safe and efficient provision of infrastructure.</li> <li>2. Ensure referencing of the Environmental Engineering Standards in the District Plan is appropriate and results in clear and measurable rules.</li> <li>3. Cross-referencing to Environmental Engineering Standards is consistent across all chapters.</li> <li>4. Ensure the District Plan provides for and enables green infrastructure, including for the control of stormwater.</li> </ul>	Support in part	Allow in part	3 Water mitigation strategies should form part of all new development along with renewable energy. The engineering standards are silent on alternative measures and rely on part to Auckland guidance documents. Alternative systems should be considered if there is suitable long term management plans for there operation. These aspects should have incentives in the plan to encourage use.
FS309.8	Ngā Tai Ora - Public Health Northland	S516.042	General	General / Plan Content / Miscellaneous	Amend the relationship of the District Plan to the Environmental Engineering Standards to: <ul style="list-style-type: none"> <li>(a) Ensure the District Plan requires the delivery of infrastructure in a manner that achieves sustainable, safe and efficient provision of infrastructure.</li> <li>(b) Ensure referencing of the Environmental Engineering Standards in the District Plan is appropriate and results in clear and measurable rules.</li> <li>(c) Cross-referencing to Environmental Engineering Standards is consistent across all chapters.</li> </ul>	Support in part	Allow in part	Road design alternatives should form part of all new private development. The risk for alternative standards for public roads is that the maintenance of them can be challenging if not standardised and will increase costs and time. The Engineering standards are silent on alternative measures for design of private and public road i.e. what are the minimum requirements.

FS309.9	Bunnings Limited	S371.028	General approach	District Plan Framework	Amend to refine the relationship of the District Plan to the Environmental Engineering Standards to:  1. Ensure the District Plan requires the management of stormwater in a manner that achieves sustainable, safe and efficient provision of infrastructure. 2. Ensure referencing of the Environmental Engineering Standards in the District Plan is appropriate and results in clear and measurable rules. 3. Cross-referencing to Environmental Engineering Standards is consistent across all chapters.	Support in part	Allow in part	There is inconsistency in the engineering standards, I support that there should be clear guidelines. Reference to external standards (Auckland guidance documents ) that are not under the control of the local authority will provide gaps in our unique far north environment
FS309.10	Lynley Newport	S121.001	Definitions	IMPERMEABLE SURFACE	Amend Impermeable Surface definition - go back to the drawing board and reach consensus with the district's engineering fraternity as to (a) what truly constitutes an impermeable surface; and (b) then look to treat shared ROW's the same way as Access Lots;	Oppose	Disallow	Paved surfaces and the control of run off from them whether they are roads or not are a major contributor to increased surface runoff. All engineering co-efficients have substantially higher rates than permeable ground surfaces. I would support a definition on what's is considered permeable ground rather than impermeable ground.
FS309.11	Haigh Workman Limited	S215.016	Transport	Rules	Insert rules on when public roads should be sealed, such as: All urban roads and Rural roads off an existing sealed public road; other Rural roads may be unsealed.	Support	Allow in part	Public roads and private roads if accessing a sealed road should be sealed to reduce the Maintenance of the public road from development.
FS309.12	Haigh Workman Limited	S215.013	Transport	TRANS-S2	Retain Standard TRAN-S2, conditional on amending TRAN-Table 8  Insert a new clause to standard TRAN-S2 requiring new vehicle crossings to be designed and constructed in accordance with Far North District Engineering Standards.  Insert a new clause to standard TRAN-S2 requiring vehicle crossings off sealed roads to be sealed or	Support	Allow	Public roads and private roads if accessing a sealed road should be sealed to reduce the Maintenance of the public road from development.

concreted for at least 5m from the road edge to control stormwater runoff and prevent gravel being deposited on the road.

FS309.13	Far North District Council	S368.018	Transport	TRANS-S4	Amend TRAN-S4  where the standard is not met, matters of discretion are restricted to:  safety implications of the non-compliance with <b>Far North District Council Engineering Standards April 2022</b> engineering standards; and	Support in part	Allow in part	The standards should reference the current published standards May 2023
FS309.14	Haigh Workman Limited	S215.006	Transport	TRAN-Table 5	Delete TRAN-Table 5, including Figures 1 to 8 and move to Far North District Council Engineering Standards.	Support	Allow	Clarity from private development is not clear between engineering standards and PDP. I agree clear rules in plan will provide minimum standards.
FS309.15	Haigh Workman Limited	S215.014	Transport	TRANS-S3	Amend standard TRAN-S3 to:  1. Passing bays are required on single lane accessways exceeding 100m at spacings not exceeding 100m;  2. Where required, passing bays on private accessways are to be at least 15m long and provide a minimum usable access width of 5.5m.  3. On all single lane accessways serving two or more sites, safe intervisibility shall be provided as specified in Council's Engineering Standards. Sections of accessway without safe intervisibility shall be widened to two-lane.  4. All accesses serving two or more sites shall provide vehicle queuing space at the vehicle crossing to the legal road.	Support in part	Allow in part	Agree that definitions and there is inconsistency in the engineering standards, I support that there should be clear guidelines.

FS309.16	Northland Regional Council	S359.012	Subdivision	Policies	<p>Insert new policy:</p> <p><b>Where subdivision and development is proposed for coastal locations, that on-site storage or suitable alternative is required, including low impact stormwater designs.</b></p>	Support in part	Allow in part	It is considered that due to the location of coastal areas that mitigation is not required. My experience is that the control of stormwater from adjacent properties if not managed or mitigated will cause damage to the receiving environment.
FS309.17	Vision Kerikeri (Vision for Kerikeri and Environs, VKK)	S521.011	Subdivision	Rules	Amend PDP to require best practice water-sensitive, low-impact designs and measures for all stormwater and wastewater engineering, infrastructure and related development, to prevent problems associated with more extreme rainfall events in future, including provision to implement relevant parts of NPS-FM>	Support in part	Allow in part	Water reuse strategies should form part of all new development along with renewable energy. These aspects should have incentives in the plan to encourage use.
FS309.18	Haigh Workman Limited	S215.033	Subdivision	SUB-S4	Amend SUB- S4 to delete (2)	Oppose	Disallow in part	The effects from stormwater management from development is a major contributor to the damage of the receiving environment and ground water recharge. The management of stormwater should not be limited to 10% AEP as larger storm events are occurring on a regular basis.
FS309.19	Haigh Workman Limited	S215.051	Earthworks	Notes	<p>Insert a note to the Rules:</p> <p>Earthworks on land defined as 'Land Susceptible to Instability' in the Definitions may result in instability. If there is reason to suspect that the earthworks may result in instability, a site-specific geotechnical assessment, undertaken in accordance with engineering best-practice, may be required to demonstrate compliance with this standard.</p>	Support in part	Allow in part	The permitted standard guideline document (GD05) is limited in the control of these measures, and should not be referenced as a means of compliance as the interpretation is too wide.