



SECTION 42A REPORT ENGINEERING STANDARDS

1	Executive summary	3
2	Introduction.....	3
	2.1 Author and qualifications	3
	2.2 Code of Conduct	4
	2.3 Expert Advice.....	Error! Bookmark not defined.
3	Scope/Purpose of Report	4
4	Statutory Requirements	4
	4.1 Statutory documents	4
	4.1.1 Resource Management Act.....	5
	4.1.2 National Policy Statements.....	5
	4.2 Council’s Response to Current Statutory Context.....	6
	4.2.1 National Planning Standards.....	6
	4.2.2 Treaty Settlements	7
	4.2.3 Iwi Management Plans – Update.....	7
	4.3 Section 32AA evaluation	7
	4.4 Procedural matters.....	8
5	Consideration of submissions received	8
	5.1 Overview of submissions received.....	8
	5.2 Officer Recommendations	8
	5.3 Background	9
	5.3.1 Key Issue 1: Engineering Standards approach in the PDP	10
	5.3.2 Key Issue 2: New Stormwater Management Chapter	15
	5.3 Conclusion.....	16

Appendix 1: Recommended decisions on submissions on Engineering Standards

List of Abbreviations



Table 1: List of Submitters and Abbreviations of Submitters' Names

Submitter Number	Abbreviation	Full Name of Submitter
S368	FNDC	Far North District Council
S344	Paihia Properties	Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd

Note: This table contains a list of submitters relevant to this topic which are abbreviated and does not include all submitters relevant to this topic. For a summary of all submitters please refer to Section 5.1 of this report (overview of submitters). Appendix 2 to this Report also contains a table with all submission points relevant to this topic.

Table 2: Other abbreviations

Abbreviation	Full Term
FNDC	Far North District Council
NPS	National Policy Statement
PDP	Proposed District Plan
RMA	Resource Management Act



1 Executive summary

1. The Far North Proposed District Plan ("PDP") was publicly notified in July 2022. The Engineering Standards approach is relevant to provisions located across the PDP.
2. 6 original submitters (with 20 individual submission points) and 14 further submitters (with 49 individual submission points) were received on the Engineering Standards approach topic. There were no original submission points that indicated general support for the provisions to be retained as notified, 16 submission points indicated support in part, with changes requested, whilst no submission points opposed the provisions.
3. The submissions can largely be categorised into two key themes:
 - Change in approach to the Engineering standards
 - Insert a new stormwater chapter into the PDP
4. This report has been prepared in accordance with Section 42A of the Resource Management Act ("RMA") and outlines recommendations in response to the issues raised in submissions. This report is intended to both assist the Hearings Panel to make decisions on the submissions and further submissions on the PDP and also provide submitters with an opportunity to see how their submissions have been evaluated, and to see the recommendations made by officers prior to the hearing.
5. The key changes recommended in this report relate to:
 - Change in approach of the relationship between the PDP and the Engineering standards.

2 Introduction

2.1 Author and qualifications

6. My full name is Sarah Trinder, and I am a Senior Policy Planner at Far North District Council.
7. I hold the qualification of a Bachelor of Science (Honours), Majoring in Geography, from The University of Auckland in 2010. I am an Associate member of the New Zealand Planning Institute.
8. I have 13 years' experience in planning and resource management including policy evaluation and development, and associated Section 32 assessments; evidence preparation, and the processing of resource consent applications, outline plans and notices of requirement. I have worked in planning in both government authorities and a private consultancy. During this time, I was involved in the development of the Auckland Unitary Plan, and the Far North District Plan.



9. I previously worked at Barker and Associates which represents a number of clients who are submitters on the PDP. I did not work for Barker and Associates during the original submission process and was not involved with any work for the Far North Proposed District Plan for any of their clients.

2.2 Code of Conduct

10. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and that I have complied with it when preparing this report. Other than when I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
11. I am authorised to give this evidence on the Council's behalf to the Proposed District Plan hearings commissioners ("Hearings Panel").

3 Scope/Purpose of Report

12. This report has been prepared in accordance with Section 42A of the Resource Management Act to:
 - a) assist the Hearings Panel in making their decisions on the submissions and further submissions on the Proposed District Plan; and
 - b) provide submitters with an opportunity to see how their submissions have been evaluated and the recommendations being made by officers, prior to the hearing.
13. This report responds to submissions on the approach of the relationship between the Engineering Standards in the PDP only.
14. It does not address submission points on engineering related provisions, analysis and recommendations on these provisions. The provision amendments will be addressed at subsequent hearings.

4 Statutory Requirements

4.1 Statutory documents

15. I note that the approach to the relationship between the Engineering Standards and the PDP was not specifically assessed through a Section 32 report, but the provisions associated with Engineering Standards were assessed through the various Section 32 reports for transport, individual zones and subdivision. These reports provide detail of the relevant statutory considerations applicable to the provisions.
16. It is not necessary to repeat the detail of the relevant RMA sections and full suite of higher order documents here. Consequently, no further assessment of the content of these documents has been undertaken for the purposes of this report.



17. However, it is important to highlight the higher order documents which have been subject to change since notification of the Proposed Plan which must be given effect to. Those that are relevant to the Engineering Standards are discussed in 4.1.2 below.

4.1.1 Resource Management Act

18. The Government elected in October 2023, has repealed both the Spatial Planning Act 2023 and Natural and Built Environment Act 2023 on the 22nd of December 2023 and has reinstated the RMA as Zealand’s primary resource management policy and plan making legislation. The Government has indicated that the RMA will ultimately be replaced, with work on replacement legislation to begin in 2024. The government has indicated that this replacement legislation will be introduced to parliament this term of government (i.e. before the next central government election in 2026). However, at the time of writing, details of the new legislation and exact timing are unknown. The RMA continues to be in effect until new replacement legislation is passed.

4.1.2 National Policy Statements

4.1.2.1 National Policy Statements Gazetted since Notification of the PDP

19. The PDP was prepared to give effect to the National Policy Statements that were in effect at the time of notification (27 July 2022). This section provides a summary of the National Policy Statements, relevant to Strategic Direction that have been gazetted since notification of the PDP. As District Plans must be “prepared in accordance with” and “give effect to” a National Policy Statement, the implications of the relevant National Policy Statements on the PDP must be considered.

20. No changes to National Policy Statements are relevant to the Engineering Standards PDP approach.

4.1.2.2 National Policy Statements – Announced Future Changes

21. In October 2023 there was a change in government and several announcements have been made regarding work being done to amend or replace various National Policy Statements (summarised in **Table 1** below). The below NPS are of general relevance to the submissions received on the Engineering Standards topic.

Table 1 Summary of announced future changes to National Policy Direction (as indicated by current Government, as of March 2024)

National Statement	Policy	Summary of announced future changes	Indicative Timing
National Policy Statement for Freshwater Management (NPS-FM)		<ul style="list-style-type: none"> Changes to hierarchy of obligations in Te Mana o Te Wai provisions Amendments to NPS-FM, which will include a robust and full consultation process 	<p>End of 2024</p> <p>2024 - 2026</p>



National Statement	Policy	Summary of announced future changes	Indicative Timing
		with all stakeholders including iwi and the public	
National Policy Statement for Urban Development (NPS-UD)		<ul style="list-style-type: none"> Amendments to NPS-UD, including requirements for Tier 1 and 2 Council to 'live zone' enough land for 30 years of housing growth, and making it easier for mixed use zoning around transport nodes. 	By end of 2024
Proposed National Policy Statement for Natural Hazards (NPS-NH)		<ul style="list-style-type: none"> No update on progress has been provided by current government. 	Unknown

4.2 Council's Response to Current Statutory Context

22. The evaluation of submissions and recommendations in this report are based on the current statutory context (that is, giving effect to the current National Policy Statements). I note that the proposed amendments and replacement National Policy Statements do not have legal effect until they are adopted by Government and formally gazetted.
23. Sections 55(2A) to (2D) of the RMA sets out the process for changing District Plans to give effect to National Policy Statements. A council must amend its District Plan to include specific objectives and policies or to give effect to specific objectives and policies in a National Policy Statement if it so directs. Where a direction is made under Section 55(2), Councils must directly insert any objectives and policies without using the Schedule 1 process and must publicly notify the changes within five working days of making them. Any further changes required must be done through the RMA schedule 1 process (such as changing rules to give effect to a National Policy Statement).
24. Where there is no direction in the National Policy Statement under Section 55(2), the Council must amend its District Plan to give effect to the National Policy Statement using the RMA schedule 1 process. The amendments must be made as soon as practicable, unless the National Policy Statement specifies a timeframe. For example, changes can be made by way of a Council recommendation and decision in response to submissions, if the submissions provide sufficient 'scope' to incorporate changes to give effect to the National Policy Statements.
25. I have been mindful of this when making my recommendations and believe the changes I have recommended are either within scope of the powers prescribed under Section 55 of the RMA or within the scope of relief sought in submissions.

4.2.1 National Planning Standards

26. The National Planning Standards determine the sections that should be included in a District Plan, including the Strategic Direction chapters, and how the District



Plan should be ordered. The Engineering Standards approach recommended in this report follows this guidance.

4.2.2 Treaty Settlements

27. There have been no further Deeds of Settlement signed to settle historic Treaty of Waitangi Claims against the Crown, in the Far North District, since the notification of the PDP.

4.2.3 Iwi Management Plans – Update

28. Ngā Tikanga mo te Taiao o Ngāti Hine' the Ngāti Hine Environmental Management Plan was in draft form at the time of the notification of the PDP. This was updated, finalised and lodged with the Council in 2022, after notification of the PDP in July 2022. In respect of the Engineering Standards the Ngāti Hine Environmental Management Plan provides the following direction:

- a) Protection of waterways on an integrated catchment basis that considers all flow-on effects

29. The Ahipara Takiwā Environmental Management Plan was in draft form at the time of the notification of the PDP. This was updated, finalised and lodged with Council in 2023, after notification of the PDP in July 2022. In respect of the Engineering Standards, the Environmental Management Plan provides direction in relation to the following:

- a) Holistic (Ki Uta Ki Tai) culturally appropriate management of natural, physical and historic resources is adopted.

4.3 Section 32AA evaluation

30. This report uses 'key issues' to group, consider and provide reasons for the recommended decisions on similar matters raised in submissions. Where changes to the provisions of the PDP are recommended, these have been evaluated in accordance with Section 32AA of the RMA.

31. The s32AA further evaluation for each key issue considers:

- a) Whether the amended objectives are the best way to achieve the purpose of the RMA.
- b) The reasonably practicable options for achieving those objectives.
- c) The environmental, social, economic and cultural benefits and costs of the amended provisions.
- d) The efficiency and effectiveness of the provisions for achieving the objectives.
- e) The risk of acting or not acting where there is uncertain or insufficient information about the provisions.



32. The s32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated.

4.4 Procedural matters

33. Due to the clarity of submissions, no correspondence or meetings with submitters needed to be undertaken and there are no procedural matters to consider for this hearing.

5 Consideration of submissions received

5.1 Overview of submissions received.

34. A total of 20 original submission points and 49 further submissions points were received on the Engineering Standards approach in the PDP.

35. The main submissions on the Engineering Standards approach came from:

- a) A Local engineering firm
- b) Nga tai Ora – Public Health New Zealand and local property owners.

36. The key issues identified in this report are set out below:

- a) Key Issue 1: Engineering standards approach in the PDP
- b) Key Issue 2: New stormwater management chapter.

37. Section 5.2 constitutes the main body of the report and considers and provides recommendations on the decisions requested in submissions. This report groups similar submission points together under key issues. This thematic response assists in providing a concise response to, and recommended decision on, submission points.

5.2 Officer Recommendations

38. A full list of submissions and further submissions on the Engineering Standards chapter is contained in **Appendix 1 – Recommended Decisions on Submissions to this report.**

39. Additional information can also be obtained from the Summary of Submissions (by Chapter or by Submitter) Submissions database Far North District Council (fndc.govt.nz) the associated Section 32 report on this chapter section-32-overview.pdf (fndc.govt.nz) the overlays and maps on the ePlan Map - Far North Proposed District Plan (isoplan.co.nz).



5.3 Background

40. The PDP was notified containing provisions that require a management approach 'in accordance with' the Far North District Council Engineering Standards 2022 (Engineering Standards). The Engineering Standards were incorporated by reference into the PDP pursuant to Clause 34(2)(c) of the RMA.
41. The Far North District has public reticulated networks available in certain locations for stormwater, wastewater and / or water supply. In a large part of the district where a public reticulated network is not available, an alternative private system is required. It is important that both private and public systems are appropriately designed to protect the health and wellbeing of residents as well as the health of the receiving environment both on-site and within the surrounding area.
42. Provisions relating to three waters management are currently located across the zone chapters and the subdivision chapter. The PDP requires three waters systems to be designed in accordance with the Engineering Standards. Various aspects of three waters management are also managed through Bylaws and the Northland Regional Plan.
43. The transport chapter also links provisions to be in accordance with the Engineering Standards. These include requirements for the design of roads and street lighting. The subdivision chapter includes general 'where relevant' links to the Engineering Standards as matters of control for Subdivision.
44. Other plans and processes that manage three waters include:

FNDC wastewater drain bylaw (2018)	Controls wastewater discharges into the public sewer, protecting the public sewer from damage, misuse and interference and protecting the environment and the health of people in the district (approval process to connect premises and flow, disconnection and works around public sewers).
FNDC wastewater disposal bylaw (2022)	Protects public health and prevents nuisance by prescribing requirements for the maintenance of onsite wastewater disposal systems, maintenance requirement and offences and penalties.
FNDC Land Drainage bylaw (2019)	Regulates land drainage assets within the identified land drainage areas.
Northland Regional Plan	Rules in regard to Domestic type wastewater and stormwater C6.1 On-site domestic wastewater discharges



	C.6.4 Stormwater discharges
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5.3.1 Key Issue 1: Engineering Standards approach in the PDP

Overview

Provision(s)	Officer Recommendation(s)
Various	Recommended change in approach will see amendments to provisions

Analysis of Submissions on Key Issue 1

Matters raised in the submissions

45. Reuben Wright (S178.018) sought to remove reference to the Engineering Standards by any rule in the Plan, stating that the Engineering standards are not written in a manner that can be interpreted as a rule. Mr Wright goes further to state that the Engineering standards could be referred to as a matter of control or discretion where appropriate.
46. Nga Tai Ora – Public Health Northland and various other submitters (S516.034, S516.042, S371.028, S344.009), with support and opposition from further submitters, seek to amend the relationship of the PDP to the Engineering Standards to ensure the following:
- The district plan requires the delivery of infrastructure in a manner that achieved sustainable, safe and efficient provision of infrastructure.
 - Referencing of the Engineering Standards in the District Plan is appropriate and results in clear and measurable rules.
 - Cross-referencing to Engineering Standards is consistent across all chapters.
 - Ensure the District Plan provides for and enables green infrastructure, including for the control of stormwater.
47. Additionally, submissions from FNDC (S368.101, 102, 103, 104, 105, 106, 107, 108, 109, 110,111, 112, 113, 114) seek to amend the Impermeable surfaces rules. Stating that the Engineering standards apply to all land development. It is sought that the following be added to all Impermeable surface rules.

"PER-2 Stormwater must be disposed of in accordance with Far North Engineering Standards April 2022"



Analysis

Background

48. It has been identified through the PDP submission process and subsequent further work with Council staff, that the current approach of incorporating the Engineering Standards by reference and requiring compliance in accordance with the standards has several issues, including:

- Assessing, monitoring and enforcing compliance with the Engineering Standards is difficult for applicants as well as Council. The Engineering Standards is a large technical document, so ensuring the standards are being met can be challenging.
- The Engineering Standards contains highly specific and detailed Engineering Standards, such as the colour of pipes. While these aspects are valid engineering concerns, they do not necessarily have RMA related effects that need management under a district plan.
- By referencing the Engineering Standards in the PDP, any updates or changes to the Engineering Standards require a full first schedule plan change in order to be reflected in the FNPDP. Since notification of the PDP, the Engineering Standards have already been revised.
- Engineering standards are inconsistently referenced throughout the plan. The referencing is general and does not direct the applicant to the appropriate section (s) of the Engineering Standards.

Relationship of Engineering Standards

49. The submission scope on the relationship of the PDP and the Engineering Standards allowed a broad consideration of a range of management options. Three of which options were analysed in more detail, these included:

- Option 1 – Status Quo.
- Option 2 – Hybrid Approach Delete reference to the Engineering Standards in rules and standards, retain reference in policies and/or as a matter of control or discretion.
- Option 3 – Decouple Engineering standards completely.

50. In discussing each of the options with Council staff at the Engineering Standards workshop, it is considered that Option 3 was the most appropriate. The Section32AA assessment of this option is included below.

Option 1 Status Quo

51. The PDP approach has subdivision provisions and in some cases land use provisions which require all sites to provide a water supply, a means for the disposal of collected stormwater and a means for the disposal of sewerage. Where these are provided, and the design of the system is in accordance with the



Engineering Standards for land use, then the activity is permitted, and for subdivision the activity would be a controlled activity. Where the provision of infrastructure is not in accordance with the Engineering Standards, then the activity is a Restricted Discretionary activity for both land use and subdivision.

52. The Transport provisions for road design and street lighting direct compliance in accordance with the Engineering Standards, and where the activity is not in accordance with the Engineering Standards then it's a Restricted Discretionary activity.
53. As stated above by submitters and detailed in paragraph 48, since the notification of the PDP it has been acknowledged that the status quo is not the most effective and efficient option. This approach has been found to be inflexible, broad, and reference to the engineering standards can quickly become outdated, which can result in costs involved in plan changes and interpretation issues.

Option 2 – Hybrid Approach

54. This approach was disregarded at the Council workshop as it would retain some of the implications and efficiencies of the status quo approach.

Option 3 - Preferred option decouple the Engineering standards

55. Decouple the Engineering Standards and PDP. Meaning there will be no dedicated reference to the Engineering Standards in the plan provisions. Instead, the provisions will be redrafted to achieve minimum requirements to protect the environment, people and Council assets. This can be achieved by including rules that refer to attenuation to protect downstream environments and the capacity/ levels of service in our infrastructure, including the lifespan of assets. It is recommended that the Engineering Standards will be only noted as a means of compliance, and the Engineering Standards which contains the technical specifications, can then be used by practitioners during the design stage.
56. The recommended change in approach, addresses Reuben Wright's (S178.018) submission, in that not having the Engineering Standards referred to in the rules will no longer cause confusion when reviewing the relevant sections of the Engineering Standards, as to what standard will need to be complied with and further, any interpretation of a rule to confirm compliance. The recommended approach to Engineering Standards goes further than what is sought by Mr Wright, in that the Engineering Standards will not only be removed from the rules but also not referred to as a matter of control or discretion. Scope for the decoupling of Engineering Standards is provided by the submission points from Nga Tai Ora, Bunnings Limited, and Paihia Properties (S516.034, 042, 371.028, 344.009).
57. To address the submission points (S516.034, 042, 371.028, 344.009), I note the following comments in response to the recommended approach to Engineering standards.



58. The provisions around the delivery of infrastructure will be amended as the result of the recommended approach, allowing the district plan to respond to the delivery of infrastructure in a manner that is sustainable, safe and efficient.
59. The provisions will no longer reference the Engineering Standards and will result in the plan being without the link 'in accordance with the Engineering Standards'. This will allow the drafting of provisions to be appropriate for what they are managing and result in clear and measurable rules.
60. The recommended approach will remove any inconsistencies in the PDP around referencing.

District Plan implementation

61. The recommended change in approach will require the insertion of information requirements/ minimum performance outcomes and amendments to the following provisions which directly reference the engineering standards:
 - TRAN-S5 Requirements for street lighting.
 - TRAN-S4 Requirements for road design.
 - Subdivision matters of control.
 - Plan wide Stormwater Management rules.
 - Plan wide Wastewater disposal rules.
62. The recommended approach will see the use of definitions to set servicing requirements, and minimum requirements to protect the environment, people and Council assets. This will be achieved by including rules that refer to attenuation to protect downstream environments and the capacity in our infrastructure, including the lifespan of assets.
63. There is sufficient scope within the provision-based submission points to address these provisions which have been allocated to subsequent hearings topics.

Other

64. In regard to the submission points from FNDC, I have recommended the removal of reference to the Engineering Standards and hence do not support the inclusion of PER-2 to the impermeable surface's rules, to link the management of stormwater to the Engineering Standards.

Recommendation

65. I recommend the submission points from Reuben Wright (S178.018), Nga Tai Ora (S516.034, S516.042), Bunnings Limited (S371.028) and Paihia Properties (S344.009) are accepted in part and the Engineering Standards are no longer referenced in provisions in the PDP.



66. I recommend the submission points from FNDC are rejected and no changes are made to the provisions.
67. I recommend the relationship of the PDP to the Engineering Standards is amended and subsequent amendments to address this approach are addressed at the transport, zone and subdivision hearings.
68. I recommend submissions and further submissions are rejected, accepted or accepted in part as set out in Appendix 1.

Section 32AA evaluation

69. While this report does not address changes to provisions, a section 32AA evaluation for the recommended change in approach is provided above.

Effectiveness and efficiency

70. The recommended change in approach will see provisions that assist with clarity and usability of the plan and in turn contains minimum requirements to protect the environment, people and Council assets.

Costs/Benefits

- The change in approach reduces the legal risk to Council associated with the version control of the Engineering Standards.
 - There is no need to go through a plan change process every time the Engineering Standards are amended.
 - There will be reduced ambiguity or interpretation issues when applying the district plan. Infrastructure provision will be based on the latest/best practice standards. The approach allows more flexibility for alternative designs that do not necessarily meet the standards, hence giving more certainty for applicants.
 - There will be certainty for applicants that there is a means of compliance for infrastructure without requiring every part of the Engineering Standards to be assessed.
 - The costs of this change of approach include, the time and cost involved (by Council) in updating the relevant PDP provisions so that they achieve the outcomes sought and remove reference to the Engineering Standards.
71. The benefits of the change in approach outweigh the costs.

Risk of acting or not acting

72. There is no risk in accepting the recommended amendments as there is sufficient information to act on the submissions.

Decision about most appropriate option



73. For the above reasons, the recommended amendments are considered to be more appropriate in achieving the purpose of the RMA than the notified version of the PDP.

5.3.2 Key Issue 2: New Stormwater Management Chapter

Overview

Provision(s)	Officer Recommendation(s)
Various	<ul style="list-style-type: none"> No change

Analysis of Submissions on Key Issue 2

Matters raised in submissions

74. Haigh Workman Limited (S215.052), with support and opposition from various further submitters, requested a new chapter to be inserted into the General District – wide matters section of the Plan addressing Stormwater Management (or impermeable surfaces generally). It is requested that this is a full chapter with an overview, objectives, policies and rules and works in a similar way to the Earthworks chapter.

Analysis

75. Haigh Workman provided the following reasoning with their submission, which I will in turn respond to.

76. *"We have identified inconsistencies in the rules and standards for Stormwater Management."* I agree with this reasoning as the PDP team has identified inconsistencies in the way that the Engineering Standards have been applied and referenced in rules between zones, land use and subdivision. The proposed new approach of decoupling of the Engineering Standards will eliminate this inconsistency.

77. *"The PDP lacks specific Objectives and Policies in relation to Stormwater Management."* I consider that specific objectives and policies are not necessary as the detail is in the rule. There are numerous submission points from a variety of submitters that seek to address stormwater through low – impact water sensitive design solutions. These stormwater management submission points, along with other submission points that address the infrastructure provisions are allocated to the subdivision reporting topic (Hearing 16). Without the inclusion of a separate chapter and the drafting of specific Stormwater Management Objectives and Policies by Haigh Workman, I consider stormwater management to be best addressed at this Hearing.

78. Haigh workman also states in their submission that the matters of discretion in the zone and subdivision rules provide no guidance on how stormwater is to be controlled when the standard is breached. I agree with this point and as stated above, the recommended approach to decouple the Engineering Standards and



the PDP will result in provisions that will have clearer direction on the management of stormwater to address this problem.

79. The further submitters that support or support in part Haigh Workman submission point provide the following reasoning:

- Grouping provisions relating to Stormwater Management would improve clarity and useability.
- There is inconsistency in the Engineering Standards and clear guidance is supported.

80. The s42A report for Part 1, Hearing 1, also addressed S215.052 inclusion of a new chapter in the PDP generally. It was stated that the National Planning Standards did not direct the inclusion of a Stormwater chapter and that Impermeable surfaces rules within each of the zone's chapter is still the best place for these rules to sit. Impermeable surface rules within the zone chapters, allows the assessment of all the bulk and location controls for that specific zone in one location.

81. While I concur with some of Haigh Workman's reasoning which has been addressed in Key Issue 1, I am not supportive of the insertion of a new chapter to the PDP.

Recommendation

82. For the above reasons, I recommend that the S215.052 is rejected, and there are no changes to the PDP.

83. I recommend submissions and further submissions are rejected, accepted or accepted in part as set out in Appendix 1.

Section 32AA evaluation

84. No change to the provisions is recommended at this stage. On this basis, no evaluation under Section 32AA is required.

5.3 Conclusion

85. This report has provided an assessment of submissions received in relation to the Engineering Standards approach in the PDP. The primary amendments that I have recommended relate to:

- a) Decoupling of the Engineering Standards and the PDP and direction to redraft associated provisions at subsequent hearings.

86. Section 5.2 considers and provides recommendations on the decisions requested in submissions. I consider that the submissions on the Engineering Standards approach should be accepted, accepted in part, rejected or rejected in part, as set out in my recommendations of this report and in Appendix 1.



87. I recommend that provisions for the related to the Engineering Standards are addressed at subsequent hearings.

Recommended by: Sarah Trinder - Senior Policy Planner, Far North District Council.

A handwritten signature in blue ink, appearing to be "S. Trinder", written over a faint, light blue circular stamp or watermark.

Approved by: James R Witham – Team Leader District Plan, Far North District Council.

Date: 22/10/2024