

Submission on Proposed Far North District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Far North District Council - District Planning

Date received: 21/10/2022

This is a submission on the following proposed plan (the proposal): Proposed Far North District Plan

Address for service:

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I wish to be heard: Yes

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?

- No

Are you directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and

(a) adversely affects the environment, and

(b) does not relate to trade competition or the effects of trade competition

- No

Submission points

Point 60.1

Section: Rural production

Sub-section: Rules

Provision:

Rural Production

zone

Activity status: Permitted

Activity status where compliance not achieved with PER-1: Restricted

Discretionary

Where:

PER-1

The <u>impermeable surface</u> coverage of any <u>site</u> is no more than 15%.

Matters of discretion are restricted to:

- a. the extent to which <u>landscaping</u> or vegetation may reduce adverse <u>effects</u> of run-off,
- b. the effectiveness of the proposed method for controlling stormwater on site;
- the availability of <u>land</u> for disposal of effluent and <u>stormwater</u> on the <u>site</u> without adverse <u>effects</u> on adjoining <u>waterbodies</u> (including <u>groundwater</u> and <u>aquifers</u>) or on adjoining <u>sites</u>:
- d. whether low impact design methods and use of green spaces can be used;
- e. any cumulative <u>effects</u> on total catchment impermeability; and
- f. <u>natural hazard</u> mitigation and <u>site</u> constraints.

Sentiment: Support in Part

Submission:

Unable to determine how effects from climate change has been considered for maintaining this level of impermeable surface coverage. The changes in regards to rainfall are significant currently designers are adding an additional 20% to intensities for climate change, this will increase stormwater run off from entire catchments and the effects will increase especially in regards to ground water recharge and overland flow paths. This is also supported from the work that NRC has done on river/stream catchments which show the effects from flooding increasing due to development and effects from climate change. The NRC assessment is limited to stream flows and flooding, the effects from development and overland flow paths to streams and rivers does not seem to be considered. In my opinion properties downstream of development will be receiving between 5- 10% more stormwater flows over the next 10 years and 20% over the next 30 years.

Currently impermeable surfaces coverage is linked to % of area, these areas can be quite large in rural areas i.e., 100ha farm can have 15ha of impermeable surfaces before trigging a consent or using mitigation measures that may be located right on a boundary discharging to a downstream property or stream, it would be assumed that this may be spread out our there would be a buffer with permeable areas, but my observation is that commercial activity in these zones occurs at the boundary due to access obviously the runoff volume from the 15ha property will have a much larger effect on downstream properties.

Relief sought

The impermeable surface coverage of any site is no more than 15% or 3000m2, which ever is the lesser

S267.001

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Section: Rural residential

Sub-section: Rules

Provision:

Rural Residential zone **Activity status: Permitted**

Activity status where compliance not achieved with PER-1:

Restricted Discretionary

Where:

PER-1

The <u>impermeable surface</u> coverage of any <u>site</u> is no more than 12.5% or 2,500m², which ever is lesser.

Matters of discretion are restricted to:

- a. the extent to which <u>landscaping</u> or vegetation may reduce adverse <u>effects</u> of run off;
- b. the effectiveness of the proposed method for controlling stormwater on site;
- the availability of <u>land</u> for disposal of effluent and <u>stormwater</u> on the <u>site</u> without adverse <u>effects</u> on adjoining <u>waterbodies</u> (including <u>groundwater</u> and <u>aquifers</u>) or on adjoining <u>sites</u>;
- d. whether low impact design methods and use of green spaces can be used;
- e. any cumulative <u>effects</u> on total catchment impermeability;
- f. <u>natural hazard</u> mitigation and <u>site</u> constraints; and
- g. extent of potential adverse <u>effects</u> on cultural, spiritual, heritage and/or <u>amenity values</u> of any affected <u>waterbodies</u>.

Sentiment: Support

Submission:

The rural residential zone could potentially become a residential zone, activities in this zone will be more residential than agricultural activities, from planning report there did not seem to be any consideration for climate change. Residential type activity creates impermeable surfaces. Lot sizes in these zones can vary 600m2 gives ample capacity for the construction of roadways, buildings for this type of activity, but allows some restriction on larger sites especially as they would not typically discharge into a reticulated system

Relief sought

The 2500m2 component should be reduce to 600m2, as this would align with settlement zone

S267.002

Point 60.3

Section: Mixed use

Sub-section: Standards

Provision:

Mixed Use zone

- At least 10% of the <u>site</u> shall be planted in grass, vegetation or landscaped with permeable material; and
- 2. The <u>stormwater</u> collection system is designed in accordance with Far North District Council Engineering Standards April 2022.

Where the standard is not met, matters of discretion are restricted to:

- a. the character and amenity of the surrounding area:
- b. whether the activity is within an existing consented <u>urban stormwater</u> management plan or <u>discharge</u> consent;
- c. the extent to which <u>building site</u> coverage and <u>impermeable surfaces</u> contribute to total catchment impermeability and the provisions of any catchment or drainage plan for that

catchment;

- d. the extent to which low impact design principles have been used to reduce <u>site</u> impermeability;
- e. <u>natural hazard</u> mitigation and <u>site</u> constraints;
- f. the effectiveness of the proposed method for controlling <u>stormwater</u>;
- g. the extent to which existing grass, vegetation or landscaping provided on site can mitigate the adverse effects resulting from reduced, alternative or no permeable surface; and
- h. extent of potential adverse <u>effects</u> on cultural, spiritual, heritage and/or <u>amenity values</u> of any affected <u>waterbodies</u>.

Sentiment: Support

Submission:

This is a good rule it encourages permeable areas and potentially amenity in these spaces

Relief sought

No change \$267.003