Oral Submission to District Plan Engineering Standards 20 Nov 2024

Tihei Mauri ora

Ko Hokianga Whakapau Karakia te moana

Ko Hunoke te maunga

Ko Whiria te pa, te paiaka o te riri, te kawa o Rahiri

Ko Ngapuhi nui tonu te iwi

Ko Ngati Korokoro, me Ngatiwharara, me Te Pouka, me Mahurehure nga hapu o te wahapu o Hokianga Nui a Kupe

Ko Waipapa nga kaianga mahi

Ko Brad Hedger Toku ingoa

Te Kaunihera o Te Hiku o te Ika, o komiti Tena Koutou

He Tangata Tena Koutou katoa

I have worked in the construction and regulatory environments for over 30 years. I am a journeyman civil engineer with a Bachelor of Engineering Technology (Civil) and I am a member of Engineering NZ . I have worked directly with the FNDC operative district plan for the last 8 years as an engineer for the Far North District Council's Resource Consent Team.

Key aspects that I would like to have addressed in the proposed plan include

1. Incorporation of Te Ao Maori principles and values in development engineering design.
2. Development engineering design and construction has regard, identifies and provides protection of taonga and places.
3. Consultation process of engineering standards and related documents.
4. Decoupling of engineering standards.
5. Climate Change
6. Stormwater Management

1. **Incorporation of Te Ao Maori principles and values in development engineering design.**

Example:

A development is proposed that requires a sewer system. It is proposed to discharge and collect and reuse grey water within the development. Sewer water is pumped across a river to a treatment plant that discharges to water. NZS 1547:2012 or 2000, Engineering standards.

- Maori principles (Mana, Taiao, Whakapapa, Wai Mauri, Ahi ka, Tohu)
- Maori Values (Rangatiratanga, Kotahitanga, Kaitiakitanga, Wairuatanga, Manakitanga, Whanaungatanga, Maturanga)
- Long term view (Waste), the infrastructure to the system is a land development issue, cuts through waterways, risk of contamination to river, flooding, no link to Maori values.

2. **Development engineering has regard identifies and provides protection of taonga and places.**

Example

A new development discharges stormwater from multiple properties with no mitigation to a piped system with an outfall into a river at the lower end of a catchment that has a significant historical and cultural value. Engineering standards give no consideration to cultural effects.

- Mana Whenua and developer to identify these catchment areas.
- Engineering standards to provide include solutions for these areas .
- Cumulative effects from Development.
- All development rules and Engineering standards to give regard to Tangata Whenua chapter. Rules not considered in isolation.

3. Consultation of engineering standards and related documents.

Example

A development has stormwater designed to Auckland Council GD04 with in ground soakage to restore the mauri of the water. GD04 has not had consultation with Northern tribes in regards to Maturanga Maori.

- Two weeks consultation, late submission as I was on leave, no response.
- Mana Whenua not consulted?
- AS/ NZS 1547:2012.
- Engineering standards references numerous other documents GD01, GD04.
- Engineering standards has no Te Ao maori link.

4. Decoupling of engineering standards.

- Land Development rules need to link to Te Ao Maori Principles and Values to ensure incorporation into design.
- 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. Transport and Subdivision, Stormwater.
- Risk that district plan will rely on engineering standard solutions for development, which have not been adequately consulted or aligned with Te Ao Maori values.

5. Climate Change

Example

A new subdivision development is located in a coastal erosion zone. The public road and utility services are 0.5m outside the regional council identified zone, dwellings within the zone are to be removable.

- Engineering standards and proposed plan to require climate change consideration for all engineered construction.

6. Stormwater Management

Example

A 10ha rural farm close to an airport decides to develop a large 1.4ha (2 x rugby fields) storage and manufacturing facility within its property (meets 15% for zoning). The site falls to an existing stream that discharges under a public road. For ease of access the site is close to its boundaries and in lower part of property catchment. During subsequent storm events both the receiving stream, down stream road culvert, and property below culvert are damaged.

- Proposed impermeable surfaces limits are arbitrary carried over from previous plan, no district wide assessment has been provided to ensure that downstream overland flow paths or downstream properties have capacity to take flows from increased impermeable surfaces and effects from Climate Change. This is in conflict with the natural law of servitude.
- Restrict impermeable surfaces areas if downstream effects assessment is unknown.
- Engineering standards to be revisited to include solutions specific to our district.

Closing

- Development engineering must incorporate Te Ao Maori principles and values to ensure Tangata Whenua objectives of plan are met.
- Taonga and places are identified and protected. Mana whenua are aware of cumulative effects from development if no or minimal mitigation is provided. All rules to have regard to Tangata Whenua chapter.
- Review of decoupled standards, include Maturanga maori and Mana whenua engagement.
- Climate change is incorporated into all sections of engineering standards and development rules.
- Impermeable surface mitigation or restriction required for all development that has not had downstream property or infrastructure effects assessed.
- Basically the engineering standards used for development do not give appropriate cultural regard. Mana whenua have not been consulted in standards development.