



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

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

- No

Submission points

Point 59.1

Section: Light industrial

Sub-section: Standards

Provision:

**Light
Industrial
zone**

1. At least 10% of the [site](#) area shall be planted in grass, vegetation or landscaped with permeable material; and
2. The [stormwater](#) collection system is designed in

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

accordance with **Far North District Council Engineering Standards April 2022.**

- a. the character and amenity of the surrounding area;
- b. whether the activity is within an existing consented [urban stormwater](#) management plan or [discharge](#) consent;
- c. the extent to which [building site](#) coverage and [impermeable surfaces](#) 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 [site](#) impermeability;
- e. [natural hazard](#) mitigation and [site](#) constraints;
- f. the effectiveness of the proposed method for controlling [stormwater](#);
- 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 [effects](#) on cultural, spiritual, heritage and/or [amenity values](#) of any affected [waterbodies](#).

Sentiment: Support

Submission:

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

Relief sought

No change

S269.001

Point 59.2

Section: Heavy industrial

Sub-section: Standards

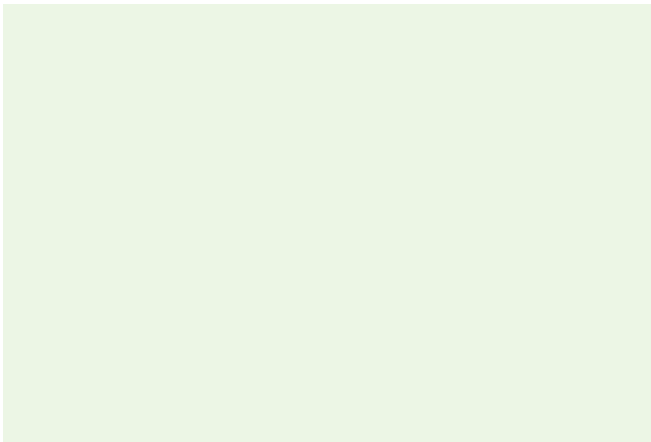
Provision:

Heavy industrial zone

1. The combined [building](#) and [impermeable surface](#) coverage of the [site](#) must be no more than 15%.
2. The [stormwater](#) 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 [urban stormwater](#) management plan or [discharge](#) consent;
- c. the extent to which [building site](#) coverage and [impermeable surfaces](#) 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 [site](#) impermeability;
- e. [natural hazard](#) mitigation and [site](#) constraints;
- f. the effectiveness of the proposed method for controlling [stormwater](#);
- 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. the extent of potential adverse [effects](#) on cultural, spiritual, heritage and/or [amenity values](#) of any affected [waterbodies](#).

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.

Impermeable surfaces coverage is linked to % of area, these areas can be quite large in rural areas i.e., 10ha industrial block can have 1.5ha of impermeable surfaces before triggering 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 over there would be a buffer with permeable areas, but my observation is that commercial or industrial activity in these zones occurs at the boundary due to access obviously the runoff volume from the 1.5ha of impermeable surfaces 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

269.002

Point 59.3

Section: Horticulture

Sub-section: Rules

Provision:

Horticulture zone

Activity status: Permitted

Where:

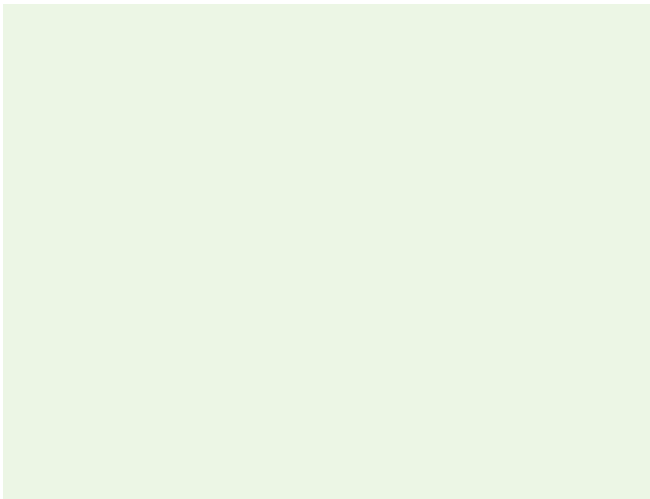
PER-1

The [impermeable surface](#) coverage of any [site](#) is no more than 15%.

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

Matters of discretion are restricted to:

- a. the extent to which [landscaping](#) or vegetation may reduce adverse [effects](#) of run-off;
- b. the effectiveness of the proposed method for



- c. controlling [stormwater](#) on [site](#);
- c. the availability of [land](#) for disposal of effluent and [stormwater](#) on the [site](#) without adverse [effects](#) on adjoining [waterbodies](#) (including [groundwater](#) and [aquifers](#)) or on adjoining [sites](#); and
- d. whether low impact design methods and use of green spaces can be used;
- e. any cumulative [effects](#) on total catchment impermeability;
- f. [natural hazard](#) mitigation and [site](#) constraints; and
- g. extent of potential adverse [effects](#) on cultural, spiritual, heritage and/or [amenity values](#) of any affected [waterbodies](#).

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 orchard can have 15ha of impermeable surfaces before triggering 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 over 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 of impermeable surfaces 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

269.003

Point 59.4

Section: Horticulture Processing Facilities

Sub-section: Rules

Provision:

[Horticulture Processing Facility zone](#)

Activity status: Permitted

Where:

PER-1

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

Matters of discretion are restricted to:

The [impermeable surface](#) coverage of any [site](#) is no more than 30%.

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

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., 5ha property can have 1.5ha of impermeable surfaces before triggering 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 over 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 1.5ha of impermeable surfaces will have a much larger effect on downstream properties.

Relief sought

The impermeable surface coverage of any site is no more than 30% or 3000m2, which ever is the lesser

S269.004

Point 59.5

Section: Maori Purpose

Sub-section: Rules

Provision:

Māori Purpose zone - [Urban](#)

Activity status: Permitted

Where:

Activity status where compliance not achieved with PER-1:

Restricted Discretionary

Māori Purpose zone - Rural	PER-1 The impermeable surface coverage of any site is no more than 50%.	Matters of discretion are restricted to: <ol style="list-style-type: none"> the extent to which landscaping or vegetation may reduce adverse effects of run-off; the effectiveness of the proposed method for controlling stormwater on site; the availability of land for disposal of effluent and stormwater on site without adverse effects on adjoining waterbodies (including groundwater and aquifers) or on adjoining sites; and whether low impact design methods and green spaces can be used; any cumulative effects on total catchment impermeability; and natural hazard mitigation and site constraints.
	Activity status: Permitted	
	Where: PER-1 The impermeable surface coverage of any site is no more than 25%.	
	Except that: On sites containing marae , the impermeable surface is no more than 50%.	

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, so on smaller sites it triggers management basically as soon as a house is built i.e. 300m2 lot 150m2 is threshold, where as a 4ha site is triggered once 20,000m3 of area is covered and this may be located right on a boundary discharging to a downstream property or stream, obviously the runoff volume from the 4ha property will have a much larger effect that 300m2 property that will effectively have mitigation.

I note also the current residential zone controlled activity has a more restrictive requirement than the permitted zone as it has a m2 limit

7.6.5.2.1 STORMWATER MANAGEMENT

The maximum proportion or amount of the gross site area covered by buildings and other impermeable surfaces shall be 60% or 600m², whichever is the lesser.

Relief sought

Urban -The impermeable surface coverage of any site is no more than 50% or 300m², which ever is the lesser

Rural - The impermeable surface coverage of any site is no more than 25% or 600m², which ever is the lesser

No change to Marae rule as this would be considered in development as they will ultimately engage with people and manaaki the land in the rohe.