

BEFORE THE HEARING PANEL

UNDER THE

Resource Management Act 1991

IN THE MATTER OF

Proposed Far North District Plan

BETWEEN

FAR NORTH DISTRICT COUNCIL

Local Authority

AND

**NORTHLAND FEDERATED FARMERS OF
NEW ZEALAND INC**

Submitter Number 421

**HEARING OF FAR NORTH PROPOSED DISTRICT PLAN – HEARING 16
SUBDIVISION**

**HEARING STATEMENT OF JO-ANNE COOK-MUNRO ON BEHALF OF
NORTHLAND FEDERATED FARMERS OF NEW ZEALAND
(INCORPORATED)**

28 – 30 OCTOBER 2025



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INTRODUCTION

1. My name is Jo-Anne Cook-Munro. I work for Federated Farmers of New Zealand (Incorporated) (**Federated Farmers**) as a Senior Resource Management Solicitor. I am authorised to speak on behalf of Federated Farmers, including Northland Federated Farmers of New Zealand (Incorporated) (**the Northland Province**).
2. I hold the following qualifications:
 - (a) A Bachelor of Social Sciences from the University of Waikato.
 - (b) Master of Social Sciences (Honours) from the University of Waikato.
 - (c) Bachelor of Laws (Honours) from the University of Waikato.
 - (d) Post graduate Certification in Business Proficiency (Law) from Massey University.
3. I have approximately ten years' experience working as a town planner for local authorities and in-house. I have over twenty years' experience in the field of environment policy and law. I have been admitted as a barrister and solicitor of the High Court of New Zealand. I specialise in environmental and resource management law. I have worked in private corporate law firms, the energy sector as well as local authorities in a variety of roles ranging from a solicitor to managing a policy and strategy team for a local authority.
4. My role at Federated Farmers is to provide legal services for resource management and environmental planning, policy and legal matters such as district and regional plan views, plan changes, national policy and proceedings in the Environment Court.
5. I have read the code of conduct for expert witnesses which is set out in Section 9 of the Environment Court Practice Note 2023. Please note that I am not putting myself forward as an expert witness presenting expert evidence. I am appearing as an advocate for the Northland Province of Federated Farmers and my statement of evidence was prepared on this basis.
6. The purpose of this evidence is to outline the position of Federated Farmers and the Northland Province on the Section 42A Report recommendations on our submissions and further submissions.

7. This evidence is focused on Topic 16 for the Far North Proposed District Plan (**Proposed District Plan**) which addresses subdivision.

SUBMISSIONS AND FURTHER SUBMISSIONS

8. Federated Farmers made submissions (S421) and further submissions (FS548) to the Proposed District Plan.

Overview

9. Federated Farmers made a general submission (S421.170) that sought the amendment of the overview to the subdivision chapter to:
- (a) acknowledge the need to provide a framework for the managed growth of rural communities; and
 - (b) expand the issue of reverse sensitivity in the rural environment so that it is addressed in detail and clearly sets out why the issue needs to be acknowledged and addressed.
10. The Section 42A report writer has recommended that the submission is rejected.¹ However, the report writer has recommended adding an additional clause to policy SUB-P11 which will address reverse sensitivity. It is proposed that the policy and new clause reads as follows:

Consider the following matters where relevant when assessing and managing the effects of subdivision: ~~Manage subdivision to address the effects of the activity requiring resource consent including (but not limited to) consideration of the following matters where relevant to the application:~~

a. the potential for reverse sensitivity effects that would prevent or adversely affect activities already established on land from continuing to operate....²

11. While Federated Farmers has not directly made a submission on policy SUB-P11, it supports the recommendation of the Section 42A writer and the amendments shown in Appendix 2, Officers Recommended Decisions on Submissions (Subdivision). The proposed amendments address the concerns Federated Farmers had in general to the Subdivision chapter as a whole.

¹ Appendix 2, Officers Recommended Decisions on Submissions (Subdivision), p142.

² Ibid, p101.

Objectives

12. Federated Farmers submission (S421.174) supported objective SUB-O1 to SUB-O4 as they had been notified in the Proposed District Plan. It supported the retention of the objectives as notified or with wording that had similar effect.
13. The Section 42A report does not refer to the submissions made by Federated Farmers on objectives SUB-O1 to SUB-O3. However, in Appendix 2 to the Section 42A, the report writer has recommended that:
 - (a) Federated Farmers submission (S421.171) on objective SUB-O1 is accepted in part;
 - (b) Submission S421.172 on objective SUB-O2 is accepted in part;
 - (c) Submission S421.173 on objective SUB-O3 be accepted in part; and
 - (d) Submission S421.175 to objective SUB-O4 is accepted in part.³
14. The Section 42A report write has recommended that objective SUB-O1 is amended as follows:

Subdivision results in the efficient use of land, which:

 - a) *achieves the objectives of each relevant zone, precinct, development area overlays, and the district wide provisions;*
 - b) *contributes to the existing or planned local character and sense of place;*

...⁴
15. Federated Farmers supports the proposed amendments to objective SUB-O1.
16. In respect of Federated Farmers submission on objective SUB-O2, the report writer does not address this in their Section 42A report. The report writer has recommended that clause (a) of the objective is deleted which refers to the protection of highly productive land.⁵
17. Federated Farmers supports this recommendation dependent on the adoption of the new objective SUB-OX which the report writer has recommended be adopted.⁶ The new objective is to read as follows:

'Subdivision protects the long-term availability and productive capacity of highly productive land by avoiding inappropriate subdivision that would compromise its use for farming and forestry activities'.

³ Above, n1, p204 and p281 respectively.

⁴ Section 42A Report Subdivision, p41.

⁵ Ibid, para [228], p51.

⁶ Above, n1, p80.

18. The inclusion of new objective SUB-OX is supported by Federated Farmers as it gives effect to the provisions of the National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**).
19. In respect of its submission to objective SUB-O3, Federated Farmers has no concerns over the amendments that have been proposed to the objective.⁷ The proposed amendments add clarity to the objective and clearly set out what is being sought in respect of the provision of infrastructure.

Policies

20. Federated Farmers made submissions in opposition to policies SUB-P8 and SUB-P9 (S421.175 and S421.176). It sought the removal of both policies and their replacement with new policies that addressed the issues of managed growth of rural areas, protection of highly productive land and the use of benefit lots. Federated Farmers felt that the policies as notified only provided for rural subdivision in certain circumstances.
21. The report writer has recommended that both submissions are accepted in part.⁸ Having reviewed the amendments proposed to both policies,⁹ Federated Farmers has no concerns with the amended policies at this time.

Rules

22. Federated Farmers submission (S421.178) supported rule SUB-R6 in part and sought amendments to RDIS-2 of the Rule to enable case-by-case approval for areas smaller than those specified in Tables 1 and 2. The Section 42A report writer has recommended that this submission is rejected.
23. Federated Farmers has made the decision not to pursue this submission point at this time. It will also not be pursuing its appeal points on rules SUB-R3 and SUB-R9 at this time.

⁷ Appendix 1, Officer's Recommended Amendments (Subdivision), p2.

⁸ Above, n1, p281.

⁹ Above, n7.