

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the hearing of submissions on the Proposed Far  
North District Plan – Hearing 13 (**Hazardous  
Substances and Natural Hazards**)

**BETWEEN:** **FEDERATED FARMERS OF NEW ZEALAND**

Submitter S421 / Further Submitter FS458

**AND:** **FAR NORTH DISTRICT COUNCIL**

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**HEARING STATEMENT FOR JESSE MACKAYLA BRENNAN  
ON BEHALF OF  
FEDERATED FARMERS OF NEW ZEALAND (INCORPORATED)**

**9 June 2025**

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## **Introduction**

1. My name is Jesse Mackayla Brennan. I am employed as a Senior Policy Advisor by Federated Farmers of New Zealand (**FFNZ**). I have a Masters degree in Environmental Management and I am a member of the New Zealand Institute of Primary Industry Management.
2. I have worked for FFNZ since March 2022. Prior to starting at FFNZ, I worked in a private practice consultancy as a Planner and Senior Planner. I have approximately eight years' experience in resource management related fields, including work with private organisations and regional councils.
3. This hearing statement is not intended to be expert evidence. This statement is instead made from the perspective of my policy role at FFNZ, in support of the FFNZ submission and further submission on the Proposed Far North District Plan (**PDP**).
4. Having reviewed the Section 42A report recommendations, this hearing statement focuses on those matters in FFNZ's submission that are most important to it. This hearing statement is structured into three sections:
  - a. Background to Federated Farmers of New Zealand and its members in the Far North District
  - b. Relief sought in relation to hazardous substances and position on the s42A report recommendations made by Ms Lynette Morgan, and
  - c. Relief sought in relation to natural hazards and position on the s42A report recommendations made by Mr Jerome Wyeth.

## **Background**

5. FFNZ is a not for profit, member funded organisation. It has a long and proud history of representing the needs and interests of New Zealand farmers, involved in a range of rural businesses (including dairy, sheep, beef, deer, goats, horses, arable cropping and horticulture).
6. Farming has a strong presence in the Northland region and contributes significantly to the region's economy. Primary production activities from

our members make a significant contribution to the economic, social, and cultural well-being of New Zealand.

7. In 2022, dairy, beef and sheep farming collectively contributed \$497 million to Northland's gross domestic product (**GDP**) and employed around 3,700 people.<sup>1</sup> When combined, farming, forestry and horticulture contributed around 13.7 percent of the GDP for the Northland region in 2022.
8. Federated Farmers represent a variety of dairy, dry stock and horticulture land users and seeks to uphold and enhance the value of farming to the region. In 2025, we have over 168 active members in the Far North district and approximately 509 members located across the Northland region.
9. Federated Farmers' key strategic outcomes include the need for New Zealand to provide an economic and social environment within which our members may operate their business in a fair and flexible commercial environment; our members' families and their staff have access to services essential to the needs of the rural community; and members adopt responsible management and environmental practices.
10. Our members want and need district plans that balances environmental, cultural, social, and economic values while ensuring rules are equitable, cost-effective, pragmatic and effects based. They also want district plans that are written in plain English; are easy to use and understand; acknowledge and reward the positive effects farming has on conservation; and recognise the importance of collaborating with communities to achieve desired environmental outcomes.

## **Hazardous substances**

### *Overview*

11. FFNZ submitted in support of the chapter overview as proposed, for the reasons outlined in its submission on the PDP. The recommendation by Ms Morgan is to retain the overview as notified<sup>1</sup>, which FFNZ supports.

### *Objectives and policies*

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<sup>1</sup> Page 14 Hazardous Substances s42A Report [para 57]

12. FFNZ submitted in support of the objectives (HS-O1 and HS-O2) and policies (HS-P1, HS-P2, and HS-P3) as notified in the PDP. The recommendation outlined by Ms Morgan is to retain these objectives and policies as notified<sup>2</sup>, which FFNZ supports.

### *Rules*

13. FFNZ submitted in part support of Rules HS-R3 to HS-R11 for the reasons outlined in its submission on the PDP.
14. In terms of Rules HS-R6, HS-R7, and HS-R9, Federated Farmers noted that a discretionary activity classification would be more appropriate than a non-complying activity status. This would allow the Council to set the appropriate matters of discretion for controlling significant hazardous facilities (**SHF**) within a significant natural area, and flood or coastal hazard areas.
15. Ms Morgan recommends rejecting submission on HS-R6, HS-R7, and HS-R9 as there is not enough evidence to analyse why these activities should be treated differently and how agrichemicals, fertilisers, acids/alkalis or paints would be considered a significant hazardous facility in the PDP<sup>3</sup>.
16. While there is no clear definition for a 'milk processing facility' provided in relevant planning documents or the PDP, FFNZ understands this to mean a plant that takes raw milk and processes it into various dairy products.
17. FFNZ also interprets the definition of SHF in terms of the storage of hazardous substances to only apply when it is associated with manufacturing.
18. FFNZ largely accepts the reasoning provided by Ms Morgan. However, FFNZ seeks confirmation that rules HS-R6, HS-R7 and HS-R9 are not intended to capture farms that carry out activities such as a dairy farm producing milk and storing this short term on farm for collection, or the

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<sup>2</sup> Page 15 Hazardous Substances s42A Report [para 65 and 66], Page 16 [paras 73-75]

<sup>3</sup> Page 24 and 25 Hazardous Substances s42A Report [para 115 and 117]

storage of hazardous substances (including agrichemicals, fertilisers acids/alkalis, etc) as a SHF.

## **Natural Hazards**

### *Overview*

19. FFNZ submitted in support of the overview as proposed, for the reasons outlined in our submission on the PDP. Mr Wyeth proposes to retain the overview as notified, which FFNZ supports<sup>4</sup>.

### *Objectives*

20. FFNZ submitted in support of the objectives (NH-O1- NH-O4) and policies (HS-P1, HS-P2, and HS-P3) as notified in the PDP.
21. In terms of NH-O1, minor amendments are proposed to refer to the environment, as outlined below<sup>5</sup>:

*“people, ~~infrastructure~~ and property, infrastructure and the environment”.*

22. FFNZ is comfortable with the proposed recommendation to provide a minor amendment to NH-O1.
23. The recommendation provided by Mr Wyeth is to retain NH-O2 – NH-O4 as notified<sup>6</sup>, which FFNZ supports.

### *Rules*

24. FFNZ submitted in support of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-7, NH-8, and NH-9 as notified for the reasons outlined in its submission on the PDP. FFNZ provide comments on these individual rules where considered relevant below.

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<sup>4</sup> Page 12 Hazardous Substances Section 42A Report [Section 5.2.1]

<sup>5</sup> Page 22 Natural Hazards Section 42A Report [para 91a]

<sup>6</sup> Page 22 Natural Hazards Section 42A Report [para 91b]

25. The recommendations made by Mr Wyeth on rules of relevance for FFNZ are summarised below<sup>7</sup>:
- a. NH-R1 is amended to enable the upgrading of infrastructure to increase the footprint of above ground infrastructure by up to 10m<sup>2</sup> as a permitted activity.
  - b. NH-R5 and NH-R6 are amended to improve workability while retaining the overall approach to manage wildfire risk.
  - c. NH-R7 is amended to clarify intent and relationship with other rules.
26. FFNZ generally accepts the recommendations made on NH-R1, NH-R5, NH-R6, and NH-R7 and the reasoning provided by Mr Wyeth.
27. Mr Wyeth does not recommend any amendments to NH-R2 and R3 for the reasons outlined in the s42A report, which is also supported by FFNZ.
28. In terms of NH-R4 (new buildings and structures ancillary to farming activity, excluding a residential activity), FFNZ supported this rule in part. FFNZ noted that a building and structure footprints being limited to less than 100m<sup>2</sup> is small for a farming ancillary building, and considered it would be more appropriate to increase the size of the footprint to 250m<sup>2</sup> which is the average size required for ancillary buildings, such as hay barns.
29. Mr Wyeth considers that increasing the footprint to 250m<sup>2</sup> is overly permissive as a permitted activity threshold for buildings in identified river flood hazard areas, and there should be an incentive to locate large farm buildings away from identified river flood hazard areas. Mr Wyeth also considers that it is the interest of the farmer/landowner to do so.<sup>8</sup>
30. Having engaged with the Federated Farmers Northland Province on this issue, FFNZ consider that many farmers would not typically place a farming ancillary building in these areas unless there is no alternative. There are also other considerations at play outside of district rules – for

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<sup>7</sup> Page 49 Natural Hazards Section 42A Report [para 218]

<sup>8</sup> Page 44-45 Natural Hazards Section 42A Report [paras 202-203]

example, the ability to get insurance for the building, and the construction materials used.

31. Having considered Mr. Wyeth's views, FFNZ largely accepts the reasoning provided. However, FFNZ felt it was necessary to demonstrate other factors that should be considered for the purposes of NH-R4 and the relief sought in the FFNZ submission.



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J Brennan

Senior Policy Advisor, Federated Farmers