

**IN THE ENVIRONMENT COURT
AT AUCKLAND
ENV-2026-AKL-000156**

UNDER the Resource Management Act 1991 (the Act)
IN THE MATTER OF an appeal under clause 14(1) of Schedule 1 of the Act
BETWEEN

FEDERATED FARMERS OF NEW ZEALAND INCORPORATED
(Appellant)

AND FAR NORTH DISTRICT COUNCIL
(Respondent)

**NOTICE OF WISH TO BE A PARTY TO PROCEEDINGS UNDER SECTION 274 OF THE
ACT BY LUCKLAW FARM LIMITED**

To: The Registrar
Environment Court
Auckland

1. **Lucklaw Farm** gives notice under Section 274 of the Resource Management Act 1991 (RMA) that it wishes to be a party to the following proceedings:
 - *Federated Farmers of New Zealand v Far North District Council (ENV-2026-AKL-000148)*., an appeal under Clause 14(1) of Schedule 1 of the Act regarding the Far North Proposed District Plan (PDP) decisions version.
2. **Lucklaw Farm is a person who has an interest in the proceedings that is greater than the interest that the general public has.**
 - Lucklaw Farm is a substantial coastal landowner within the Far North District (Karikari Peninsula) whose landholdings are directly captured, restricted, and financially impacted by the computer-generated spatial overlays and rules contested in this appeal. Lucklaw Farm Limited also made a comprehensive primary submission on these specific chapters during the initial FNDC PDP hearings phase.
3. **Lucklaw Farm is not a trade competitor** for the purposes of section 308D of the Resource Management Act 1991.
4. **Lucklaw Farm is interested in all of the applicants appeal proceedings**, with specific interest directed at the Coastal Environment (CE), Natural Features and Landscapes (NFL), and Indigenous Biodiversity (IB) chapters of the Far North District Council Proposed District Plan (PDP).
5. **Lucklaw Farm** Limited supports in part the relief sought by the Appellant (Federated Farmers), particularly where the appeal seeks to inject operational

flexibility, reduce regulatory burdens on rural landscapes, and challenge the accuracy of desktop GIS-modeled spatial boundaries.

6. However, Lucklaw Farm Limited opposes any total deletion of environmental overlays that fails to offer an alternative statutory path forward. Instead, Lucklaw Farm Limited seeks a structured middle ground to bridge the gap between environmental protection and economic survival

7. Particular Interests and the "Strategic Balance" Mechanism

Lucklaw Farm Limited is specifically interested in resolving the friction between static, computer-generated protection lines and dynamic, on-the-ground sustainable land stewardship. Lucklaw Farm Limited intends to promote a district-wide Adaptive Coastal Property Management Plan (CPMP) Pathway structured around the following core tenets:

The Overarching Grand Vision: All “opting-in” large-scale coastal properties operate under an unmoving, high-level Strategic Spatial Master Plan (the "Grand Vision") that fixes the maximum development caps, visual landscape thresholds, and total conservation footprints to avoid cumulative adverse effects.

Boundaries as the Fluid Balancing Mechanism: Within that fixed Grand Vision, the internal protection and operational lines are explicitly recognized as the flexible variables. Internal boundaries must be fluid to allow the plan to adapt to real-time landscape and ecological changes.

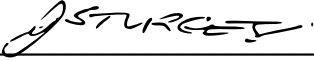
The Technical Report Override: Rather than requiring an expensive, lengthy Plan Change or full Discretionary Resource Consent for minor adjustments, internal boundaries can be altered seamlessly via a Controlled or Restricted Discretionary pathway, *provided* the change is verified by an independent expert's peer-reviewed Technical Report (e.g., ground-truthed ecology or visual screening assessments) and explicitly remains within the master parameters of the Grand Vision.

Conservation Financing: Ensuring that low-impact development enclaves generate the sustainable commercial returns necessary to actively fund intensive animal and weed pest eradication and offset soaring council rates.

8. Mediation and Resolution Focus

Lucklaw Farm Limited agrees to participate in mediation or other alternative dispute resolution proceedings. Lucklaw Farm Limited would like to work collaboratively with both the Appellant and other aligned Section 274 parties (including Bentzen Farm Limited, Ironwood Trustees, and Matauri Trustee Limited) to establish a comprehensive, unified Schedule rule within the FNDC PDP that balances ecological preservation with practical, long-term multi-generational farming viability.

Dated this 28th day of September 2026



John Sturgess

For and on behalf of Lucklaw Farm Limited

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