

**FAR NORTH DISTRICT COUNCIL  
TE KAUNIHERA O TE HIKU O TE IKA**

**PROPOSED FAR NORTH DISTRICT PLAN HEARINGS PANEL**

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**UNDER THE**

Resource Management Act 1991

**ON BEHALF OF**

Mr Lewis Thomas Grant, Mr Jake Ryan Lockwood, Mr Luke  
Stephen Lockwood and Mr Stephen Graham Lockwood

**Lockwood Family**

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**Supplementary Memorandum of Counsel**

**26 August 2025**

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Hearing 15B: Rezoning Requests for new Special Purpose Zones  
Monday 1 - Thursday 4 September 2025



**MAI CHEN**  
BARRISTER

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- 1 Counsel for the Lockwood Family file this memorandum to further update the Independent Hearings Panel (the **Panel**) on various matters in relation to Motukiekie Island under the Far North District Council (the **Council**) Proposed District Plan (the **Proposed Plan**) for Hearing 15B.
- 2 In the memorandum and legal submissions filed for the Lockwood Family on 18 August, counsel asked that the Panel *“please let me know if you have questions for the Lockwood Family, counsel and/or the expert witnesses and would see value in them appearing remotely at 2pm on the Tuesday?”*
- 3 By email from the Submissions & Hearings Administrator Alicia-Kate Taihia of Thursday 21 August, the panel has asked the questions below which we respond to in this Supplementary memorandum of counsel. The email also states that “[t]here may be some other questions that arise,” and counsel, Luke Lockwood for the Lockwood Family, and expert witnesses James Hook (planning) and Mike Farrow (landscape architecture and ecology) will appear before the Panel on Tuesday 2 September to answer any further questions. Ms Taihia’s email stated that the submitter did not need to appear, but Luke is keen to do so since he has been leading these submissions on behalf of the Lockwood family, including his newly born (5 week old) son who will inherit and be kaitiaki of the Island going forward.

#### **Items raised in section 42A report**

- 4 The Panel asked:

Specifically, and firstly, we refer to the 5 items raised by Mr Baxter in the s42A report at para 190 and at para’s 191 and 192 with which the submitter agrees, as confirmed in para’s 7 and 8 of the Memorandum from Counsel for the submitter. We would want to be asking the submitter to confirm that is all agreed and particularly that it can then satisfactorily be carried through into the precinct provisions for Motukiekie Island.
- 5 The Lockwood Family confirms that all five of these recommended amendments have been carried through into the revised precinct provisions attached to the Section 42A Report as Appendix 3.4 on the “Recommended provisions for Motukiekie Island precinct”.
- 6 The Lockwood Family also confirms its agreement with the revised version of the precinct provisions provided with the Section 42A Report.

#### **Matters raised by Ms Absolum**

- 7 The Panel also asked:

Secondly, we would ask the submitter whether the matter raised by Ms Absolum, at para 187 of the s42A report, has satisfactorily been met. It appears to be so but we note at para 188 of the 42A report that Ms Absolum had not reviewed the consequential amendment the submitter had made and we would want it confirmed that the concern has been met.
- 8 Paragraph 187 of the Section 42A Report refers to matters raised by Ms Absolum stating:

Ms Absolum’s memo requested that the principles identified in Mr Farrow’s evidence be included in the overview provisions of the MIP. These have since been incorporated into the Motukiekie Island Building Guidelines by the submitter, which in my opinion is appropriate. However, Ms Absolum did not have the opportunity to amend her memo to reflect this change before this report was published. The Lockwood family confirm that the principles referred to have now been incorporated.

- 9 The Lockwood Family confirm that the principles referred to by Ms Absolum have been added alongside the Building Guidelines to form part of the precinct provisions, as part of the revised proposal.
- 10 The Lockwood Family understand that Ms Absolum was overseas at the time the Council provided her with their revised proposal and so was unable to review it and confirm her position before finalisation of the Section 42A Report – hence the comment at paragraph 188.

**Exact Location of Building Areas**

- 11 Lastly the Panel stated:
- Thirdly, there is the matter of the provision of the shapefile or similar to assist Council with plotting the exact location of building sites. That has not been finalised and needs to be.
- 12 The Lockwood Family confirm that James Hook provided the FNDC GIS/Mapping Team the shapefile to address the exact location of the proposed building areas (as referred to in paragraph 160 of the Section 42A Report) on Friday 22 August. Mr Baxter confirmed for the Council by email on Monday 25 August that the shapefile was in the appropriate format and had been reviewed and was displaying the correct information.

**DATED** 26 August 2025



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Mai Chen / Caleb Saunders  
Counsel for the Lockwood Family