

**BEFORE THE PANEL
AT KAIKOHE**

IN THE MATTER of the Resource Management Act 1991
(the Act)

AND

IN THE MATTER Proposed Far North District Plan

MEMORANDUM ON BEHALF OF WAIUAU BAY FARMS LIMITED



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MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of Waiaua Bay Farms Limited (**WBFL**) in relation to the timetable for the proposed Far North District Plan (**Plan**) hearings.
2. The Panel released a draft schedule for the Plan hearings in December 2023 which scheduled the Kauri Cliffs Special Purpose Zone (**KCZ**) hearing for May to June 2024.
3. As recorded in email correspondence to the Council, WBFL own all the land in the KCZ. Its principal planner, Stephen Daysh, has been appointed as the Independent Chair for the New Plymouth District Council's "Future Development Strategy" hearings which are scheduled for late April. Due to the timeframe for an urgent decision on this matter, Mr Daysh will be unavoidably absent for periods of May and June 2024.
4. Consequently, WBFL's participation in the hearings process would be prejudiced by the non-availability of their key expert witness to participate in the single most critical hearing for WBFL, as the sole landowner in the Kauri Cliffs Zone.
5. WBFL seeks that the KCZ topic be heard at the same time as hearing stream 19, in July 2025, with the associated evidence dates.

DATE: 27 March 2024



Mike Holm / Louise Ford

Legal Counsel for Waiaua Bay Farms Limited