

**Before the Independent Hearings Panel
Far North District Council**

Under: the Resource Management Act 1991

In the matter of: Submissions and further submissions in relation to the proposed Far North District Plan

And: Lucklaw Farm Limited (s551, 585), Trustees of the Taranaki Trust (s582), and Grace Anne Sturgess (s583)

**Memorandum of counsel for Lucklaw Farm Ltd requesting to be heard at
Hearing 17: Sweep Up**

Dated: 9 October 2025

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May it please the Panel

1. Lucklaw Farm Limited ("**Lucklaw**", submitter 551, 585) was a submitter at the coastal environment hearing (in relation to vehicles on beaches and mapping issues) on 6 August 2024.¹
2. Lucklaw respectfully requests to be heard as part of the 'Sweep-up' hearing, Hearing 17 to be held on 4 to 6 November 2025, in relation to two matters:
 - a. To reply (briefly) to matters raised by Mr Wyeth (reporting officer for the Coastal Environment hearing), who filed supplementary evidence for the vehicles on beaches issue, dated 26 May 2025.
 - b. To address (briefly) mapping discrepancies which appear to be unresolved between district and regional coastal mapping for areas of significance.²
3. The request to be heard re the vehicles on beaches issue is made on the following grounds:
 - a. The officer provided a written right of reply, dated 23 August 2024 after the close of the hearing.
 - b. Mr Wyeth filed a further supplementary report to the Panel, dated 26 May 2025 further responding to Lucklaw's submission point s550.001, after the date of Hearing 4. In effect this was a supplementary section 42A report.
 - c. It is submitted that it is in accordance with the principles of natural justice for Lucklaw to be provided the opportunity to briefly reply (only) to Mr Wyatt supplementary report to the Panel dated 26 May 2025.
 - d. The 'Sweep Up' hearing provides a logical (and last) opportunity for Lucklaw to reply.
4. The request to be further heard in relation to the mapping issue is made on the following grounds:
 - a. The submission by Lucklaw³ identified discrepancies in the coastal mapping of overlays between the PDP (e.g. outstanding natural landscape, outstanding natural character, etc.) and equivalent overlay mapping for

¹ Lucklaw has also appeared before the panel on other topics, including the designation topic, and re-zoning.

² submission points s 551.002; 551. 003, 551. 004; 551. 005

³ Legal submissions for Lucklaw Farm Ltd coastal environment (submissions 551, 585) dated 2 August 2024, at [48] – [68].

outstanding features in the regional policy statement and regional plan, which is contrary to the RMA.

- b. After the hearing, the Far North District Council notified variation 1 which addresses some GIS mapping issues, but not the coastal mapping issues raised by the submitter.
- c. While that part of the s42A report by Mr Wyatt recommended rejection of Lucklaw's submission on mapping issues, the s 42A report by Ms Absalom stated (at page 3) that the author could not explain the discrepancies:

I agree that there is a difference between the maps in that ONC44 does not extend seaward in the PDP as far as it does in the RPS. I note that the CE in the PDP maps extends as far as the HNC in the RPS map, so the difference would not appear to be a matter of the extent of FNDC jurisdiction. **I therefore cannot explain the difference.**

(Emphasis supplied)

- 5. On reviewing the You-Tube record of the coastal hearing, the Chair noted that the Panel would be seeing Lucklaw in future hearings going forward, and that *"there may be an opportunity for some conferencing or future engagement..."*.⁴
- 6. The sweep up hearing provides the last opportunity to address matters, including any other Puwheke Beach related point that may arise, such as following the Panel's recent inspection (s394, etc).
- 7. Lucklaw seeks directions allowing it to be heard at Hearing 17 in relation to the matters above.

Dated: 9 October 2025



Stuart Ryan
Counsel for submitter

⁴ Hearing recording, 6 August 2024 - Midday Session, <https://www.youtube.com/watch?v=ou9juf7kg1A>, at 1 hour 45 minutes.