

Before the Independent Hearings Panel
at 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: 15c Rezoning

and: **Lucklaw Farm Limited**

SUMMARY STATEMENT: Melanie Robyn Dixon (Ecology)

Dated: 02 October 2025

SUMMARY STATEMENT: MELANIE ROBYN DIXON

- 1 My name Melanie Robyn Dixon. I am employed as a consultant ecologist. My qualifications and experience are set out in my primary evidence.
- 2 As I detailed in my primary evidence, the ecological values of the Puwheke Beach, Rotokawau Lakes and surrounds, which includes areas of intact dunes, dune swales, dune lakes, freshwater wetlands and shrublands are **very high**.
- 3 This high value relates to the diversity of habitats, ecological sequences (from freshwater to shrubland and dune vegetation), representative value, Threatened and At Risk species present¹. The size and diversity of wetlands present is especially notable and significant given the very high loss of wetlands in the Northland Region².
- 4 The significance of the area is recognised by the numerous overlays in the Proposed District Plan. In addition, whilst maps showing Significant Natural Areas (SNAs) were removed from Council's Proposed District Plan, the lakes, beach, and most of the vegetation on Lucklaw Farm and adjacent properties was mapped as forming a Significant Natural Area (reference FN411) by Far North District Council's consultants³.
- 5 A defining feature of the ecology of the area is its naturally low nutrient levels. For example, the low-fertility, acidic soils (remnants of the former kauri forest) give rise to heathlands – a distinctive, low-growing shrubland vegetation dominated by mānuka. The wetlands present (e.g. dune lakes and coastal peatlands) are also characterised by naturally low nutrient levels.
- 6 These unique soil and water conditions underpin the ecological significance of the area and its sensitivity to nutrient enrichment. For example, the Rotokawau Lakes themselves have limited surface water inflows and outflows making them particularly vulnerable to nutrient accumulation and degradation.⁴ In my view, the long-term preservation of these values is incompatible with conventional farming practices, particularly fertiliser use.
- 7 In addition, extensive pest management is essential to protect the threatened wildlife of the area, which is already under pressure from invasive species. To illustrate this point, despite the presence of high-quality habitat, a 2023⁵ survey recorded few wetland bird species (such as mātātā / fernbird and matuku-hūrepo / Australasian bittern) and no geckos, likely due to the cumulative impacts of pest animals. This

¹ Surveys of the beach and surrounds (Boffa Miskell 2022, Wildlands 2023) found the area a range of indigenous species that are listed as Threatened or At Risk, for example, shorebirds, wetland birds (including matuku – Australasian bittern) a shore skink and several plants.

² The current extent of wetlands is estimated to be 14,291 ha, or about 3.2% of historic extent (453,251 ha). See Clarkson, B.R. and Price, R.J. (2022) A framework for monitoring Northland wetlands. Manaaki Whenua – Landcare Research report (Envirolink Grant 2205-NLRC228. Available at: <https://www.envirolink.govt.nz/assets/Envirolink/2205-NLRC228-A-framework-for-monitoring-Northlands-wetlands.pdf>

³ It should be noted, however, that Outstanding Natural Character (ONC) and High Natural Character (HNC) overlays have not been 'ground-truthed' and as such contain some errors as discussed at paragraphs 14 and 15 of my evidence-in-chief. The draft SNA was likewise not ground truthed.

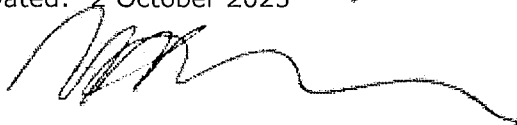
⁴ Although as noted in paragraph 28 of Mr Blyth's evidence improvements in land management would also need to occur across the wider catchment to improve lake health, not just on Lucklaw Farm itself.

⁵ Wildlands (2023) Assessment of Indigenous Biodiversity at Rotokawau Lakes and Environs, Karikari Peninsula, Northland. Report prepared for John and Andrea Sturgess, Lucklaw Farm.

highlights the need for comprehensive pest control to support the recovery of native fauna. I note that pest plants also require management.

- 8 In recognition of the very high ecological values and the apparent incompatibility of farming and the high ecological values present the managers of Lucklaw Farm have considered alternatives uses for the site that maximises ecological outcomes whilst creating economic benefits.
- 9 A master plan approach has been adopted for the future development of the site, as outlined in the revised zoning plan and the Puwheke Development Area presented in Mr Langman's rebuttal evidence. This framework identifies locations for various activities – such as the visitor centre, glamping area, and rural lifestyle subdivision – which will require resource consent under the relevant zone provisions. While no outcomes are predetermined, the plan provides a comprehensive overview of anticipated development.
- 10 Whilst there are some risks, as scale of potential adverse effects cannot be known until the necessary consents are applied for, the framework of proposed objectives, policies and rules facilitates large-scale landscape and ecological restoration and provides a clear and detailed pathway for development to ensure long-term sustainability and the on-going legal protection of wetlands, heathlands, and dune vegetation along with the species these areas support. Notably given the sensitivity of the ecological features Policy DEV-PWK-P7 specifically requires maintaining, and where possible improving, water quality through water sensitive design.
- 11 The proposal has many benefits arising from the ecological restoration that would be required to accompany any development. This includes riparian planting (to improve water quality, instream habitat, and wildlife corridors) and taking a 'bespoke'⁶ approach to the management of heathlands. Additionally, transitioning from farming to low-impact land uses and implementing best-practice wastewater treatment may reduce nutrient loads, benefiting dune lakes and wetlands⁷.
- 12 In conclusion, it is my opinion that the risks of the status quo (farming) far outweigh the risks of the development proposal as outlined in the rebuttal evidence of Mr Langman.

Dated: 2 October 2025



Melanie Robyn Dixon

⁶ The heathlands are successional habitats that depend on disturbance to ensure their persistence in the landscape. Plant diversity is often higher along edges and track sides than in undisturbed areas, showing some tolerance for activities in this area such as mountain biking, if managed carefully. A 'bespoke' management plan for this area would include (1) the staged removal of non-local mānuka, (2) the need for fire-breaks in this flammable plant community and (3) a strategic approach to pest plant control.

⁷ See the evidence of James Blyth, paragraph 33.

