

**BEFORE AN INDEPENDENT HEARINGS PANEL
APPOINTED BY THE SOUTH WAIKATO DISTRICT COUNCIL**

UNDER	the Resource Management Act 1991
IN THE MATTER	of an application under s 88 of the Act
BY	SUBDIVISION AT 597 HORAHORA RD
PARTY	Bates Family Trust

PRIMARY EVIDENCE OF SHANNON BRAY

Dated: 14 October 2026

PRIMARY EVIDENCE OF SHANNON BRAY

Introduction

- [1] My name is Shannon Bray. I am a director and landscape architect at Wayfinder Landscape Planning & Strategy Ltd (Wayfinder).
- [2] The following provides an overview of my qualifications and professional background:
- Bachelor of Landscape Architecture with Honours from Lincoln University (1996).
 - Bachelor of Forestry Science (1994) from Canterbury University.
 - Registered fellow and past president of Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA).
 - Past chair the NZILA Environmental Legislation Committee.
 - Initiator, reviewer and signatory to Te Tangi a te Manu – NZILA’s best practice guidance for landscape assessment.
 - Lead author and presenter of NZILA submissions on RMA reform.
 - Awarded by the NZILA for my contribution to landscape assessment policy.
- [3] I have over 23 years of experience as a landscape architect in Aotearoa New Zealand, with a specialisation in landscape assessment. My experience includes the planning, assessment and design of several hundred residential, rural-residential and greenfield development projects throughout New Zealand. This work ranges from small lifestyle developments through to large greenfield growth areas of a similar scale to the proposal currently before the Panel.
- [4] I have worked extensively within sensitive receiving environments, including Outstanding Natural Landscapes (ONL), Outstanding Natural Features (ONF), coastal environments, river corridors and highly visible rural landscapes. My experience includes projects throughout Hawke’s Bay, Taranaki, Waikato, Auckland, Northland and Central Otago.

- [5] In addition to landscape assessment, my work has included subdivision design, structure planning, master planning, growth planning and the preparation of residential development frameworks and guidelines. This has required consideration of how residential development should respond to landscape character, landform, natural features and long-term community outcomes. I have been involved in broader settlement planning and growth strategy projects, including work for Tararua District Council relating to district-wide urban growth and residential development planning.
- [6] I have participated in urban design review processes and have regularly reviewed and critiqued residential development proposals from both landscape and urban design perspectives.
- [7] I have also studied examples of urban, rural, greenfield and brownfield development in a range of international settings. This has informed my understanding of how different settlement patterns respond to landscape character and how development can be integrated into sensitive landscapes while retaining the qualities that make those landscapes distinctive.
- [8] Through this experience I have developed a particular interest in how development contributes to landscape identity, sense of place and long-term landscape outcomes. My work frequently involves evaluating not only the immediate landscape and visual effects of development, but also how different subdivision patterns influence the long-term character, management and appreciation of landscapes.

Code Of Conduct

- [9] I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and will continue to comply with it while giving oral evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Overview Of Evidence

- [10] I have been engaged by Bates Family Trust to provide expert landscape architecture evidence on the proposal to develop land at 597 Horahora Road for rural lifestyle subdivision and associated land use activities.
- [11] My evidence first outlines the methodology I have followed, including my site visits, review of the application and amended material, engagement with the Applicant's landscape architect and planner, and review of the relevant planning and historical material.
- [12] I then consider the planning history of the site, beginning with its identification for rural lifestyle development, the landscape concerns that informed that zoning, and how the resulting provisions sought to direct development in a way that maintained landscape quality and protected the qualities of the Waikato River setting.
- [13] I next address the subsequent ONL overlay, the values identified in the various assessments and final District Plan policy, and how the overlay and Rural Lifestyle Zone provisions were intended to operate together.
- [14] Finally, I assess the proposal against that combined framework. I consider the changes made through the redesign, the remaining development pattern and effects, and whether the proposal provides an appropriate and acceptable landscape response to the landscape policy it is being considered under.
- [15] I also comment on additional conditions that I consider would be required to reduce residual landscape effects and provide greater certainty over implementation if the Panel determines that the proposal can proceed despite the concerns I raise.

Methodology

- [16] In preparing this evidence, I undertook two visits to the site and surrounding area. I viewed the site from Horahora Road and other publicly accessible locations. During my first visit, the Applicant granted me access to traverse the full length of the site and examine the terrace landforms and the site's relationship with the River.

[17] I have reviewed the application and supporting material provided by the Applicant, including the original and amended proposals, the landscape and visual assessments, landscape plans, relevant planning assessments, the Council landscape peer review and the evidence provided by the Applicant. My assessment has considered both the changes made through the redesign and the landscape outcomes that would arise from the proposal as it now stands.

[18] In particular, the following information underpins my evidence:

- South Waikato District Council, Decision on Proposed Plan Change 18 – Rural Residential (2008).
- South Waikato District Council, Report One – Attachment to Report 2008-4762, Proposed Plan Change 18 (2008).
- K G and L J Tylee, Submission on Proposed Plan Change 18 – Rural Residential (2008).
- Waipa District Council, Submission on Proposed Plan Change 18 – Rural Residential (2008).
- South Waikato District Council, Operative District Plan – Rural Lifestyle Zone.
- South Waikato District Council, Operative District Plan – Natural Features and Landscapes.
- South Waikato District Council, Operative District Plan – Subdivision.
- South Waikato District Council, *Section 42A Report, RM240115*.
- Mansergh Graham Landscape Architects, *Landscape Peer Review, RM240115*, prepared for South Waikato District Council, dated 10 July 2026.
- Isthmus Group Ltd, South Waikato District Landscape Assessment, Final Report, August 2012.
- South Waikato District Council, *Response to LGOIMA Request LG0132*, 14 October 2026.

- Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River.
- Rebecca Ryder, *Statement of Evidence – Landscape Architecture*, dated 7 October 2026.
- David Moule, *Statement of Evidence – Planning*, dated 7 October 2026.
- Gerardus H A Kessels, *Statement of Evidence – Ecology*, dated 7 October 2026.

[19] I met with the Applicant's landscape architect (Ms Jo Soanes) and planner (Ms Rebecca Steenstra) in March 2026 to discuss the proposal and provide direct professional feedback on the landscape issues I had identified. This included the development pattern, its relationship with the river and terrace landscape, and opportunities to achieve a more clustered and landscape-responsive outcome. I have considered the Applicant's response to that meeting (and the other submissions they received), and the subsequent amendments to the proposal.

[20] I have also reviewed the relevant District Plan provisions and historical material relating to the Rural Lifestyle zoning, the identification of the ONL, and earlier consideration of landscape outcomes for development within the Waikato River corridor.

Landscape Context

[21] Ms Ryder provides a detailed description of the site and its wider landscape context. I generally agree with that description and do not see the need to repeat it. Mr Mansergh also agrees that the Applicant's assessment identifies the relevant landscape context.

[22] For the purposes of my assessment, the key features are the site's elongated form between Horahora Road and the Waikato River, the sequence of river terraces and escarpments, the gullies and wetland areas draining toward the River, the predominantly open pastoral land cover, and the existing riparian and gully vegetation. These features establish the physical and experiential relationship between the road, terrace landforms and River that is central to my assessment of the subdivision pattern and the ONL values.

Te Ture Whaimana o Te Awa o Waikato

- [23] Te Ture Whaimana o Te Awa o Waikato, the Vision and Strategy for the Waikato River, is the primary direction-setting document for the Waikato River and activities within its catchment affecting the River. Its overarching purpose is the restoration and protection of the health and wellbeing of the Waikato River for present and future generations.
- [24] Te Ture Whaimana promotes an integrated, holistic and coordinated approach to the natural, physical, cultural and historic resources of the River. It recognises the relationships of River iwi and wider communities with the River, requires recognition and avoidance of adverse cumulative and potential cumulative effects, and acknowledges that the River should not be required to absorb further degradation from human activities.
- [25] These directions are relevant to my landscape assessment because the site is part of a connected river landscape. Its landscape values are not limited to the immediate water margin, but arise from the relationship between the River, terraces, escarpments, gullies, wetlands, vegetation, cultural associations and the way the wider river corridor is experienced. They also require consideration of the cumulative and long-term landscape change that would result from the proposed subdivision pattern.
- [26] I note that the significance of Te Ture Whaimana is further reinforced by its express recognition in s11 of the new Planning Act.

Introduction of Rural Lifestyle Zoning

- [27] The site was identified for rural residential development through Plan Change 18 to the former South Waikato District Plan in 2008. That plan change was intended to provide for rural residential growth in selected locations, rather than allowing such development to occur in an ad hoc or dispersed manner throughout the rural environment.
- [28] The Plan Change 18 material shows that providing opportunities for rural residential living was only one part of the exercise. The process also considered the landscape consequences of subdivision, including the potential for scattered

development, the loss of rural character, and linear development of uniform small lots along road frontages.

- [29] These concerns were particularly relevant at Horahora Road because of the relationship between the land, the Waikato River corridor, and the wider river valley landscape. The material before the Council included submissions seeking a more concentrated pattern of development, the retention of open river terraces, and avoidance of a scattering of buildings and structures along the river corridor.
- [30] The property's inclusion was not consistent with the earlier staff recommendation recorded during consultation on Plan Change 18¹. At that stage, Council staff recommended that rezoning on the western side of Horahora Road should not proceed, while supporting rezoning on the eastern side of the road (to the north of the Tylee site), excluding land on the upper escarpment. The property was subsequently included through the submission and decision process following a submission by the landowners, K G and L J Tylee.
- [31] The decision records that the submission was accepted on the basis that any adverse effects of rural residential development would be adequately avoided, remedied and mitigated through the proposed subdivision rules and landscape controls governing the design, appearance, landscaping and placement of new buildings within the Waikato River valley corridor².
- [32] In landscape terms, the resulting direction was therefore not simply that the site could be subdivided for rural residential use. The anticipated outcome was a planned and coordinated form of development that responded to the particular landscape setting, avoided an undifferentiated ribbon of lots, and retained the qualities of the Waikato River valley.

¹ South Waikato District Council, Report One, Proposed Plan Change 18: Record of Consultation 2008 (July 2008), p 9. For Site 13, Horahora Road north, Council staff recommended "*Not proceed with Horahora Road west side rezoning*" and "*Proceed with Horahora Road east side rezoning, excluding land on upper escarpment.*"

² South Waikato District Council, Decision on Proposed Plan Change 18 – Rural Residential (2 November 2009), Horahora Road North, Reasons for Decision.

[33] That direction is now reflected in the current Rural Lifestyle Zone (RLZ) provisions. While those provisions provide for rural lifestyle development in specifically zoned locations, they also seek³:

- subdivision design and layout that responds appropriately to the site and its landscape setting;
- cluster development;
- avoidance of lineal lot patterns along roads;
- adequate separation from the Waikato River; and
- protection of the landscape character, visual amenity and biodiversity values of the river valley.

[34] Because the RLZ provisions apply generally across the district, they do not themselves distinguish between development within and outside an ONL. That distinction is principally achieved through the application of the relevant objectives and policies, which provide the direction needed to ensure that development within an ONL produces an appropriately different outcome. I will return to this point later.

[35] The District Plan also provides more specific direction for the location and design of buildings⁴. Development is to be sited and designed sympathetically with the landform, landscape and existing vegetation, and is not to visually or physically dominate views from or to the locality.

[36] I therefore understand the Rural Lifestyle zoning as establishing that although development is anticipated, not *any* rural lifestyle subdivision pattern is appropriate. From its introduction, the zoning was accompanied by a clear landscape direction. Development was to be coordinated, responsive to the river valley setting, and arranged to avoid the linear and fragmented outcomes that were expressly identified as concerns during the plan change process.

³ South Waikato District Plan, Chapter 13.3 Rural Lifestyle Zone, Policy RLZ-P5(a)–(e).

⁴ South Waikato District Plan, Chapter 13.3 Rural Lifestyle Zone, RLZ-Rules

Adding the Outstanding Natural Landscape Overlay

- [37] The ONL overlay was added *after* the site had already been identified for rural residential development, and I consider that sequence to be important.
- [38] Essentially, the ONL was applied in the context of an existing expectation that rural lifestyle development could occur on the site. In my opinion, this means that the key matter to consider is not whether development is anticipated, but rather how such development is arranged so that the landscape values subsequently recognised through the ONL are protected.
- [39] The 2012 Isthmus review of the Horahora Road section of the Waikato River was undertaken following a submission by Raukawa. It assessed the area's physical, perceptual and associative values, including the river terraces and wetlands, geomorphic escarpments, indigenous riparian and wetland vegetation, bird habitat, picturesque qualities, recreation, cultural associations and the wider values of the Waikato River⁵.
- [40] The Isthmus review recommended that the Horahora Road area be recognised as part of the Lake Karāpiro Significant Amenity Landscape rather than as an ONL. Council has since confirmed that Raukawa disagreed with that classification and, together with Ngāti Korokī Kahukura and Ngāti Hauā, considered that the whole River should be identified as an ONL⁶. The Waikato River Authority also sought that outcome. Council subsequently notified the Proposed District Plan in November 2012 with the land adjoining Lake Karāpiro, including this site, identified within ONL10. No submissions were received opposing that identification and it subsequently became operative.
- [41] The Isthmus review provides a detailed account of the landscape values of this part of the River. Ms Ryder's evidence also addresses a number of those matters,

⁵ Isthmus Group Ltd, South Waikato District Landscape Assessment, Final Report (August 2012), Addendum 2, "Horahora Road River Review", pp 77–84, particularly p 84.

⁶ South Waikato District Council, Response to LGOIMA Request LG0132 (14 October 2026), response to Question 1.

particularly the river terraces, gullies, wetlands, indigenous vegetation and the wider Waikato River corridor.

[42] Drawing these matters together with my own assessment of the site, I consider the key landscape values relevant to this site, as part of the ONL, to be:

- the sequence, form and legibility of the river terraces and escarpments
- the gullies, wetlands and drainage patterns associated with the terrace and river system
- the indigenous riparian, wetland and gully vegetation and associated habitat
- the predominantly open character of the terrace landscape
- the wider Waikato River corridor
- the spatial and experiential relationship between Horahora Road, the terrace landforms and the Waikato River.

[43] These values are interconnected. The Isthmus assessment emphasises that landscape significance should be considered holistically because its physical, perceptual and associative dimensions are interrelated and a landscape is more than the sum of its parts. Consistent with that approach, I consider that the value of this site does not reside in individual features viewed in isolation. It arises from the way the terraces, escarpments, gullies, wetlands, vegetation and River combine to form a coherent and legible river landscape. This also aligns with the vision and direction of Te Ture Whaimana.

[44] Importantly, the ONL overlay did not remove or replace the Rural Lifestyle zoning. Rural lifestyle development remains anticipated, but its form, location and design must respond to the values now recognised through the ONL. This reinforces the Rural Lifestyle Zone direction for clustering, avoidance of lineal development, layouts responsive to landform, and protection of the landscape character and visual amenity values of the Waikato River valley.

[45] In my opinion, the combined direction is that development should work with the underlying landscape structure, rather than simply be accommodated within it. The river terraces, escarpments, gullies, wetlands and vegetation should

continue to read as a coherent river landscape, with the relationship between Horahora Road, the terrace landforms and the Waikato River remaining legible and appreciable after development.

- [46] Ms Lonnberg-Shaw, in her s42A report, places emphasis on the Rural Lifestyle zoning and treats the ONL as part of the context within which the anticipated development is assessed⁷. I take a different view of that relationship and do not consider the ONL overlay to be simply contextual. Under section 6(b) of the Resource Management Act 1991, its protection from inappropriate subdivision, use and development is a matter of national importance. In my opinion, that requires the identified values of the ONL to be central to determining whether the form and pattern of development are appropriate. The Rural Lifestyle zoning provides the opportunity for development, but the ONL is fundamental to determining what form that development should take.
- [47] That importance is also carried forward in the Planning Act 2026. Although that Act does not determine this application, its stated goals include protecting from inappropriate development the identified values and characteristics of ONLs. The retention of that direction through the replacement legislation reinforces that ONLs represent landscapes of the highest importance in Aotearoa New Zealand. They are not areas in which an otherwise conventional development pattern should proceed with landscape values addressed principally through mitigation. The development pattern itself must respond to and protect the values and characteristics that make the landscape outstanding.
- [48] I therefore assess the proposal on the basis that rural lifestyle development is anticipated, but that its particular form and pattern must protect the identified values of the ONL. The question for my assessment is whether the proposed layout achieves that outcome, having regard particularly to the river terraces and escarpments, the open character and legibility of the landform, the gullies and wetlands, and the relationship between Horahora Road and the Waikato River.

⁷ Eloise Lonnberg-Shaw, Officer's Report under s42A, RM240115, 30 September 2026, at [111], [126] and [248].

The Proposal Originally Applied For

- [49] The proposal as originally lodged provided for 81 residential lots across the site. While the number of lots was relevant to the scale of change, my primary concern was not the yield in isolation. It was the way the lots and future dwellings were distributed across the site and related to the underlying landscape structure.
- [50] The original layout established an extensive sequence of residential buildings extending through the length of the property. Buildings broadly followed the northern edge and extended around the eastern part of the site, with further development dispersed across the wider central terrace. In my opinion, this created a predominantly linear pattern rather than a series of identifiable clusters separated by meaningful areas of open landscape.
- [51] That pattern placed development across the river terraces and reduced the ability to retain larger coherent areas of open landform. It also limited opportunities for deliberate gaps through which the relationship between Horahora Road, the terrace sequence and the Waikato River could remain legible and appreciable. In my opinion, this would have diminished the spatial and experiential relationships between the river, terraces and escarpments that contribute to the values of the ONL.
- [52] The original proposal also involved approximately 270,000m³ of cut-to-fill earthworks across the three stages. The most substantial modification was proposed within Stage 3, where extensive cutting of the existing terraces and ridge, and filling of the intervening valley, was proposed to form roads, building platforms and stormwater infrastructure. In my opinion, these works would have significantly altered the river terrace landforms that contribute to the structure and values of the ONL.
- [53] Drawing on my experience in developing and reviewing residential proposals, I was also concerned that parts of the subdivision, including some future lots and building areas, relied substantially on newly formed fill. I do not offer a geotechnical opinion on the suitability of that fill. Rather, from a landscape perspective, this reinforced my concern that the proposed development pattern depended on extensive reconstruction of the terrace landforms, rather than

locating development in a manner that worked more directly with the existing topography.

- [54] I was also concerned about the proposed staging. The application described three stages, commencing with the northern part of the site, then progressing to the southern area, with the larger central area to follow. The material did not clearly establish when each stage would occur or the extent to which completion of the overall landscape framework depended on all three stages proceeding. I therefore considered it important to understand the landscape outcome at the completion of each stage, including whether the site could remain for an extended period as separate areas of development rather than the single integrated outcome shown on the overall plans.
- [55] These concerns reflected the matters I raised with the Applicant's landscape architect and planner. I considered that the layout should respond more directly to the site's landscape structure by concentrating development in selected areas, creating clearer separation between development nodes and retaining more substantial open areas associated with the terraces, gullies and river corridor.
- [56] My concern was therefore not that 81 lots necessarily represented an unacceptable outcome simply because of their number (and I iterated that point to the Applicant through our conversation). Rather, the proposed yield was expressed through a dispersed and substantially linear layout that did not, in my opinion, provide the clustering or landscape-led structure anticipated by the Rural Lifestyle Zone provisions and the ONL overlay.

Revised Proposal

- [57] I acknowledge that the revised proposal responds to a number of the concerns raised through submissions, peer review and my direct engagement with the Applicant's advisers. Mr Moule records that the amended proposal now complies with the average lot-size requirements and is assessed as a discretionary activity, with the earlier non-complying activity trigger and section 104D gateway no longer applying⁸. I do not offer a planning opinion on the activity status or ultimate

⁸ David Moule, Statement of Evidence – Planning, 7 October 2026, at 5.5 and 6.4.

determination. My assessment is whether the amended proposal provides an appropriate landscape response to the Rural Lifestyle Zone and ONL setting.

- [58] The revised proposal reduces the number of lots from 81 to 73 and includes a number of other changes, including reduced earthworks, greater retention of the existing landform, additional restoration planting, an esplanade strip along the River and additional controls on future buildings.
- [59] The reduction in earthworks addresses one of the concerns I identified with the original proposal, by reducing the extent of physical modification to the river terraces.
- [60] I also acknowledge Mr Kessels' evidence regarding the ecological outcomes associated with the restoration framework. I accept those conclusions within his area of expertise. However, those ecological outcomes are distinct from my assessment of the subdivision pattern and its effect on the wider landscape.
- [61] The planting framework and building controls will also assist in managing the visibility and appearance of future development. I regard these primarily as measures that mitigate the effects of the proposed layout, rather than changes to the layout itself.
- [62] Despite these amendments, in my opinion, the fundamental spatial framework of the proposal remains substantially unchanged. I consider that the distribution of development across the site still does not adequately respond to the landscape structure and ONL values identified earlier (my paragraph [41]). The amendments mitigate aspects of that development, but they do not, in my opinion, resolve this underlying issue.
- [63] This distinction is central to my assessment. I consider that the subdivision pattern itself must be derived from and respond to the site's landscape structure and identified ONL values. Planting, restoration and built-form controls can mitigate the effects of that pattern, but they do not necessarily make the underlying pattern appropriate. My concern is therefore not primarily with the adequacy of the mitigation proposed, but rather it is that the fundamental spatial framework remains substantially unchanged and, in my opinion, does not provide

the clustered, landform-led response anticipated by the Rural Lifestyle Zone and ONL provisions.

- [64] I have also considered Mr Mansergh's landscape peer review in reaching that conclusion. I agree with him that there is a tension between providing for the development anticipated by the Rural Lifestyle zoning and protecting the values of the ONL. Where I differ is in the significance I place on the underlying subdivision pattern in resolving that tension. In my opinion, the ONL values need to inform the arrangement of development from the outset, rather than being addressed principally through mitigation applied to the resulting layout.

Residual Effects of Revised Layout

Clustering and lineal development

- [65] Ms Ryder and Ms Lonnberg-Shaw both consider that the revised layout provides a more clustered development pattern⁹. I do not share that view. In my opinion, the underlying spatial pattern remains substantially similar.
- [66] Figure 1, attached to the back of my evidence, provides a simplified comparison of the indicative building locations shown for the proposal as originally lodged and for the revised proposal. It removes the detailed lot boundaries, access arrangements and landscape mitigation so that the underlying spatial pattern of anticipated buildings can be more readily understood. The upper diagram shows the original proposal and the middle diagram shows the revised proposal. In addition, I have prepared a schematic showing a more clustered arrangement, depicted in the lower diagram. I will return to this shortly.
- [67] In my opinion, Figure 1 makes clear that the revised layout reduces the scale of change but retains a substantially linear pattern of future development extending through the length of the site between Horahora Road and the Waikato River corridor. The removal of eight lots creates some additional space within that pattern, but does not, in my opinion, establish identifiable development clusters separated by substantial and legible areas of open landscape.

⁹ Evidence of Rebecca Ryder, Landscape Architect, 7 October 2026, at [35] and [38]; Eloise Lonnberg-Shaw, Officer's Report under s42A, RM240115, 30 September 2026, at [190] and [248].

- [68] The alternative, which I have not tested against other site or planning constraints, is an exercise to demonstrate what a more clustered arrangement could look like. This alternative utilises a much smaller individual lot size – large enough to provide a more rural experience, but reduced to keep domestication tightly contained – alongside larger lots that seek to provide more open connection between the road and the river, whilst protecting the unique terracing across the site.
- [69] My concerns regarding clustering are also identified in the Council peer review. Mr Mansergh states he does not agree with the Applicant's conclusion that the proposal completely avoids a lineal development pattern along Horahora Road, although he acknowledged that the narrow and elongated form of the site limits the opportunity for a genuinely clustered pattern¹⁰. I agree with both observations. Where I place greater emphasis is on the consequence of that constraint. In my opinion, it increases the need for deliberate concentration of development and meaningful open gaps rather than making a substantially continuous pattern acceptable.
- [70] Mr Moule describes the revised layout as generally clustered and consolidated, relying in part on the grouping of lots around internal access and roading¹¹. I reach a different landscape conclusion. In my opinion, clustering is principally a characteristic of the spatial arrangement of lots and dwellings. Internal access and vegetation can assist in defining, separating or integrating clusters, but they do not create a clustered development pattern where the underlying distribution of development remains substantially continuous.
- [71] I therefore consider that the revised layout does not adequately achieve the direction in Policy 13.3-RLZ-P5 for cluster development and avoidance of lineal lot patterns along roads.
- [72] I acknowledge that the site itself is elongated and that this constrains the form of development that can be achieved. However, in my opinion, the current layout continues to distribute lots and future dwellings across much of the available

¹⁰ Dave Mansergh, Mansergh Graham Landscape Architects, Landscape Peer Review, RM240115 (10 July 2026), pp 11–12.

¹¹ David Moule, Statement of Evidence – Planning, 7 October 2026, at [6.7] and [8.7].

terrace landscape. The linear form of the site does not make the resulting pattern inevitable and there remains scope for greater concentration of development and more deliberate separation between developed areas.

Design and layout response to the landscape

- [73] Policy 13.3-RLZ-P5 directs the design and layout of development to respond to the site and its landscape setting. Ms Ryder identifies what she considers to be a number of important improvements in the revised proposal that respond to landscape, including the reduced yield, increased average lot size, retention of landform, ecological restoration and landscape mitigation¹². I acknowledge each of those improvements, however, the central difference between our assessments relates to the weight we place on the underlying subdivision pattern relative to the mitigation measures proposed.
- [74] The central difference between our assessments is the weight given to the subdivision pattern itself. In my opinion, the layout should be derived from the site's landform, river relationship and ONL values, rather than relying principally on mitigation applied after the pattern has been established.
- [75] The planting framework will provide ecological benefits, strengthen vegetation and reduce the visibility of buildings as it matures. That is beneficial, but screening does not remove the effect of residential occupation being distributed across the terrace landscape or ensure that the landform remains coherent, legible and appreciable.
- [76] The defined building areas and controls on height, colour and materials will limit some aspects of future built form. In my opinion, they do not materially change the overall pattern of residential occupation. Dwellings, garages and the main domestic structures would ordinarily be expected to occur in proximity to one another. The controls are therefore most effective in limiting the dispersal of ancillary buildings within individual lots, rather than reducing the broader landscape effects created by the number and distribution of developed lots.

¹² Rebecca Ryder, Statement of Evidence – Landscape Architecture, 7 October 2026, at [40], [48] and [69]–[75].

Relationship with the Waikato River and ONL values

- [77] Policy 13.3-RLZ-P5 seeks adequate separation from the Waikato River and protection of the landscape character and visual amenity values of the river valley. The ONL provisions also require subdivision and land use to protect the values of the river landscape and give effect to Te Ture Whaimana. In my opinion, those directions require more than physical separation from the immediate river margin. They require the wider terrace, escarpment, gully and river system to remain coherent, legible and appreciable following development.
- [78] In my opinion, the revised layout will still reduce the coherence of the open landform and the ability to appreciate the spatial relationship between Horahora Road, the terrace sequence, escarpments, gullies and the Waikato River. Although the esplanade strip and planting provide greater physical and visual separation from the immediate river margin, development remains distributed across the wider terrace landscape that contributes to the legibility and experience of the ONL.
- [79] I consider that the residual effect is a reduced ability to understand and appreciate the river terraces as a coherent landscape system. This is inconsistent with the policy direction to protect the landscape character and visual amenity values of the river valley, and with the integrated and cumulative perspective promoted by Te Ture Whaimana.
- [80] Public access is also relevant to the way the river landscape is experienced. The revised proposal provides a 10-metre esplanade strip along the Waikato River frontage and retains development setbacks from the immediate river margin. I acknowledge that these measures provide physical separation and reduce the extent to which residential development directly occupies the riparian edge. However, the proposal retains the Waikato River Trail beside Horahora Road. Mr Moule confirms that the proposal does not include formation or relocation of the Trail and that any future relocation would be a separate project¹³.
- [81] In my opinion, relocation of the Trail into the esplanade strip should be resolved and secured as part of this subdivision. Public access to and along river margins is an important means of maintaining rivers as shared landscapes. This becomes

¹³ David Moule, Statement of Evidence – Planning, 7 October 2026, at [6.17]–[6.19] and [8.13]–[8.15].

more important where rural land is converted to residential occupation, because dwellings, gardens, fencing and other domestic activity can create a stronger perception that the river frontage forms part of a private residential environment.

- [82] A formed public route would, in my opinion, reinforce the riparian corridor as publicly accessible, strengthen direct experience of the river and reduce the potential for effective privatisation of the river edge. Although the setback and esplanade strip assist, they are not sufficient on their own.
- [83] Addressing the Trail now would also avoid relying on a future retrofit through a developed residential environment and would better maintain public appreciation of the River, terraces and riparian margin within the ONL.

Long-term landscape character and management

- [84] The 5,000m² minimum lot size reflects the planning framework established for this area more than 15 years ago. In my experience, lots of this size commonly function as large residential properties rather than productive rural units and are increasingly expressed through lawns, gardens, specimen and shelter planting, fencing, driveways, lighting, water tanks and ancillary structures.
- [85] Each proposed lot will therefore become an individually managed domestic landscape. The wider planting framework will provide some consistency and reduce the visibility of development if successfully established and maintained, but it will not control the full landscape expression of each lot. The resulting pattern will be a patchwork of private domestic environments across the ONL, rather than larger areas managed coherently as part of the river terrace system. This gradual domesticisation is relevant to Policy 13.3-RLZ-P5 and its direction to protect the landscape character and visual amenity values of the river valley.
- [86] Larger lifestyle lots do not necessarily reduce landscape change. Compared with a compact cluster, they spread residential occupation and private management across a wider area. Although the vegetation framework will mitigate that change, the spatial spread and variability of domestic activity will remain a material residual effect on the coherence and identity of the ONL.

- [87] Tighter clustering could instead retain larger, coherent areas of terrace landscape under coordinated management while still providing for rural lifestyle development.

Staging and integrated landscape outcomes

- [88] The revised proposal retains three development stages. Mr Moule's proposed conditions require each stage to operate independently and prevent physical works for a subsequent stage from commencing until section 224(c) certification has been issued for the preceding stage¹⁴. This provides a clear sequence for the subdivision works.
- [89] That sequencing does not, however, mean that development of one stage will be complete before work begins on the next. Following section 224(c) certification, dwelling construction, domestic occupation and establishment of the landscape framework within an earlier stage may occur concurrently with subdivision works and planting in the following stage. The site could therefore function for an extended period as several areas at different stages of development and landscape establishment.
- [90] In my opinion, the relevant requirement is that each stage should provide a coherent landscape outcome in its own right, including the open-space structure, planting and restoration needed to integrate that stage with the wider ONL. It should not rely on the completion or maturation of later stages to achieve the integrated landscape outcome depicted for the development as a whole.

Residual earthworks and terrace modification

- [91] The revised earthworks are substantially reduced from those originally proposed and this is an important improvement. However, earthworks are still required to form the road network, building areas and associated infrastructure. In my opinion, the residual landscape effect is the continued modification of parts of the terrace system to accommodate the selected development pattern. This remains relevant to the ONL values associated with the river terraces and geomorphic escarpments, and to the policy direction that development be designed sympathetically with the existing landform.

¹⁴ Ibid, Appendix A, proposed condition 7.6(c)–(e).

Overall residual effects

- [92] Taken together, the revised proposal will still result in substantial and permanent change to the character and experience of the river terrace landscape. Reduced earthworks and stronger planting materially lessen the effects of the original proposal, but the layout remains substantially linear, lacks clearly defined clusters and meaningful open gaps, and distributes domestic occupation across the terraces.
- [93] This conclusion partly aligns with the Council peer review. I agree with Mr Mansergh that the proposal will substantially change open pastoral land to a rural lifestyle environment, that the revised landform and planting measures reduce effects, and that the elongated site constrains the design response¹⁵. Where we differ is the weight given to the persistent lineal pattern and the spread of domestic occupation and management across an ONL.
- [94] In my opinion, the resulting effects on landscape coherence, ONL legibility and the long-term character of the river valley remain material and are not adequately aligned with Policy 13.3-RLZ-P5 or the ONL provisions.
- [95] However, before reaching a final conclusion, the next question I would like to address is whether those residual effects are an unavoidable consequence of providing for rural lifestyle development on this site, or whether a different arrangement could better achieve the development outcome anticipated by the Rural Lifestyle zoning while responding more appropriately to the ONL and the policy direction identified above.

Potential Improvements

- [96] I have considered potential improvements to the proposal to assist in determining whether the residual effects I identify are an unavoidable consequence of providing for Rural Lifestyle development on this site. I have not prepared an alternative subdivision design and do not suggest that there is only one appropriate outcome. My purpose is to identify the landscape principles that, in

¹⁵ Dave Mansergh, Mansergh Graham Landscape Architects, Landscape Peer Review, RM240115 (10 July 2026), pp 11–15.

my opinion, could produce a development pattern more closely aligned with the Rural Lifestyle Zone and ONL policy direction.

- [97] In my opinion, the central improvement would be to derive the layout more directly from the site's landscape structure. This would involve concentrating development into more clearly defined clusters, separated by deliberate and substantial open gaps associated with the terraces, gullies, escarpments and river corridor (as per my example in Figure 1). The objective would not simply be to screen buildings, but to retain larger parts of the landform as coherent and appreciable landscape areas.
- [98] Achieving that outcome may require greater variation in lot size. Applying the 5,000m² minimum relatively consistently across the site spreads private ownership and domestic management over much of the terrace landscape. Smaller lots within selected clusters, combined with larger lots or commonly managed open areas, could contain that occupation while retaining the most important landform and river relationships. In my broader experience of working and observing rural residential development, I consider there is significant merit in exploring options to substantially reduce lot sizes (to, say 2,000m²) in balance with retaining larger lots in either private or community ownership. This was a key point I made to Ms Soanes and Ms Steenstra in our March meeting, and I offered to work with them during the meeting to explore some high-level options on how this might be achieved.
- [99] In my experience, such an approach could provide greater long-term control over landscape character. Domestic activity would be concentrated within the clusters, while the larger open areas could be managed collectively through planting, grazing, restoration or other appropriate means.
- [100] In my opinion, the location of clusters should be informed by the existing topography and the capacity of the landform to contain development. Gullies, changes in level and existing or proposed vegetation could help define development nodes, while the more open and legible terrace areas could remain substantially free of buildings. This would respond more directly to Policy 13.3-RLZ-P5 by achieving clustering, avoiding a continuous lineal pattern and designing development sympathetically with the landform and landscape.

- [101] In preparing this evidence, I also considered the Lake Whakamaru Development Area Plan, recently introduced into the South Waikato District Plan for rural lifestyle development adjoining another part of the Waikato River ONL. I recognise that it is site-specific and does not govern this application. It nevertheless provides a relevant local example of development structured around identifiable residential clusters, intervening reserves, public connections, covenanted landscape areas, and coordinated planting and maintenance requirements. Importantly, the Rural Lifestyle Zone includes specific provisions directed towards achieving these design outcomes at Whakamaru, despite the development area itself not being within the ONL. If anything, the ONL context of this site reinforces the need for a carefully considered design and layout response. In my opinion, the Whakamaru example demonstrates that clustering, coherent open areas and coordinated landscape management are practicable responses to rural lifestyle development within the Waikato River landscape.
- [102] I consider that deliberate open gaps are important. In my opinion, these should be wide enough to be read as meaningful landscape areas rather than incidental spaces between lots. Their location should maintain opportunities to appreciate the relationship between Horahora Road, the terrace sequence, escarpments, gullies and the Waikato River, and to retain the legibility of those features within the ONL.
- [103] The relationship with the River should, in my opinion, also be strengthened by relocating the Waikato River Trail into the esplanade strip as part of this subdivision. The existing setbacks and esplanade strip provide some physical separation from future residential lots, but a formed public route would more clearly maintain the riparian corridor as a shared landscape, strengthen public experience of the River and reduce the perception that the river edge has become part of the private residential environment. Addressing the route now would also avoid relying on a future retrofit once the site has been developed and domestic occupation established.
- [104] Any revised arrangement should also be capable of delivering a coherent outcome at each stage. In my opinion, the planting, restoration, open-space areas and connections required to integrate each cluster should be established as part

of that stage, rather than relying on later stages to complete the landscape framework.

[105] I have not undertaken the detailed subdivision, infrastructure or economic analysis required to determine the precise yield of such an arrangement. However, in my opinion, tighter clustering and more varied lot sizes may allow a substantial residential yield, and potentially a yield similar to that proposed, while retaining larger coherent areas of the terrace and river landscape. The relevant point is that a material reduction in yield is not necessarily the only means of retaining and protecting the values of the ONL, as required by the national and District Plan direction applying to this landscape.

[106] These potential improvements reinforce my view that the residual effects of the revised proposal are not simply an unavoidable consequence of the Rural Lifestyle zoning or the elongated shape of the site. They also arise from the selected subdivision pattern. In my opinion, a more clustered, landform-led and coherently managed arrangement could better provide for rural lifestyle development while protecting the landscape character, visual amenity and ONL values of the Waikato River valley.

Conclusion on Revised Proposal

[107] Mr Moule concludes that the revised proposal is consistent with the overall direction of the District Plan and that there is no planning basis to decline consent or require fundamental redesign¹⁶. I do not offer a planning opinion on the ultimate decision. However, that conclusion relies in part on the landscape proposition that the proposal is clustered, avoids a linear pattern and appropriately protects the ONL values. For the landscape reasons set out above, I do not agree with that foundation.

[108] In my opinion, the revised proposal does not adequately achieve the landscape outcomes sought by the objectives and policies of the Rural Lifestyle Zone. In particular, it does not provide the clustered, coordinated and landscape-responsive form of development directed by Policy 13.3-RLZ-P5, and it retains

¹⁶ David Moule, Statement of Evidence – Planning, 7 October 2026, at [7.58], [8.8]–[8.9] and [9.21].

the substantially lineal and dispersed pattern that the zoning history expressly sought to avoid.

[109] More specifically, my landscape assessment of the revised proposal against the components of Policy 13.3-RLZ-P5 is as follows:

- (a) *Cluster development and avoidance of lineal lot patterns along roads.* In my opinion, this direction is not achieved. The lots and anticipated buildings remain distributed through much of the length of the site and do not form identifiable clusters separated by substantial and legible open gaps. Internal roading and vegetation assist with access and integration, but do not alter that underlying spatial pattern.
- (b) *Separation of access and through-traffic functions.* The use of internal roads and shared accessways reduces the number of direct vehicle crossings and provides a more coordinated access arrangement. From a landscape perspective, I acknowledge this as a positive feature, although it does not itself establish a clustered settlement pattern.
- (c) *Adequate separation from the Waikato River and hydro-electric power operating easements.* The setbacks and esplanade strip provide physical separation from the immediate river margin and are improvements over the original proposal. In my opinion, however, physical separation alone does not protect the wider experiential relationship between the River, terraces, escarpments and Horahora Road, because development remains spread across the broader river terrace landscape.
- (d) *Safeguarding the landscape character, visual amenity and biodiversity values of the Waikato River valley.* The restoration planting and ecological framework provide clear biodiversity benefits and will reduce the visual prominence of buildings over time. In my opinion, the landscape character and visual amenity components are not adequately achieved because the proposal will establish a substantially continuous pattern of domestic occupation and individually managed landscape across the ONL.
- (e) *Development sympathetic to the existing landform, landscape and vegetation.* The reduced earthworks, retention of the Stage 3 gully and

natural terraces, and expanded planting framework are material improvements. However, in my opinion the layout remains principally yield-led, with mitigation applied to the resulting development pattern. It has not been sufficiently derived from the existing landform and the values of the river landscape.

- (f) *Reverse-sensitivity effects*. I do not offer an opinion on the management of reverse-sensitivity effects, except to note that this component does not alter my conclusions regarding the landscape pattern and effects of the proposal.

[110] That conclusion is reinforced by the subsequent identification of the site within ONL10. The Isthmus assessment recognised that the physical, perceptual and associative dimensions of landscape are interconnected and should be considered holistically. The ONL identification did not remove the opportunity for rural lifestyle development, but it requires that development be arranged and managed in a way that protects the coherence and legibility of the wider river landscape. My assessment of the revised proposal against the identified ONL values is as follows:

- *Landform and hydrological values*. The river terraces, geomorphic escarpments, gullies, wetlands and drainage patterns form an interconnected river. The reduced earthworks and greater retention and restoration of the Stage 3 gully, natural terraces and wetland areas are material improvements. However, in my opinion the proposal continues to distribute roads, lots, building areas and domestic occupation across the terrace system. Subdivision into numerous individually managed lots will make it difficult to retain and manage the landforms coherently over time. The terraces and rises will instead be divided between private domestic environments, each subject to separate decisions about access, grading, planting, fencing and maintenance. The material I reviewed does not clearly demonstrate how access to every lot and building area will cross the changes in level and terrace rises without further localised modification. In my opinion, this pattern will reduce the coherence and legibility of the landforms, increase their domestication, and limit the extent to which the gullies, drainage patterns and terrace structure organise the development.

- *Ecological values.* Mr Kessels considers that the expanded restoration framework will protect the principal ecological features and deliver a net gain for indigenous biodiversity. I accept his ecological expertise and acknowledge the positive effects of the proposed riparian, wetland and gully restoration, habitat connections and long-term protection measures. He also explains that the restoration areas form part of the Landscape Masterplan and that the ecological and landscape outcomes are mutually reinforcing. My landscape concern is different. Those measures protect and enhance identified ecological areas, but do not create a single coherent management regime across the wider terrace landscape or control the full domestic expression of each lot. Much of the protected land will remain within separate private titles, with individual landowners responsible for aspects of long-term management. In my opinion, ecological enhancement therefore makes an important positive contribution, but does not by itself retain the broader spatial, experiential and management coherence of the ONL where residential occupation remains dispersed across the terrace system.
- *The wider Waikato River landscape.* The esplanade strip, river setbacks, restoration planting and reduced earthworks improve the proposal's relationship with the immediate river margin. In my opinion, the relevant landscape value extends beyond that margin to the relationship between the River, terraces, escarpments, gullies, Horahora Road and the way the river corridor is experienced. The substantially linear and dispersed pattern of development will weaken that relationship and reduce the coherence, legibility and appreciation of the river terrace landscape. The proposed planting and built-form controls will reduce the visibility and apparent prominence of buildings over time, but will not prevent the long-term change to a patchwork of individually occupied and managed domestic environments.

[111] The revised proposal responds positively to parts of the ONL framework through reduced earthworks, retention of gullies and terraces, restoration planting and the esplanade strip. In my opinion, those measures do not overcome the effects of the subdivision pattern on the coherence, legibility and long-term character of the river terrace landscape or adequately protect the identified ONL values.

- [112] In summary, the improvements mitigate rather than resolve the effects of a substantially linear layout that lacks sufficient clustering and meaningful open gaps and fragments long-term management. The resulting outcome does not reflect the landscape direction established with the zoning and strengthened by the ONL overlay.
- [113] Those effects are not an unavoidable consequence of enabling rural lifestyle development. A more clustered, landform-led arrangement, potentially with greater variation in lot sizes and larger coherent areas under coordinated management, could provide substantial development while better protecting the ONL values.
- [114] For these reasons, in my opinion, the proposal does not appropriately reconcile the development opportunity provided by the Rural Lifestyle zoning with the direction to protect the identified ONL. Its present pattern does not adequately retain the coherence, legibility and long-term character of the river terrace landscape.
- [115] A useful test is whether the developed landscape would continue to exhibit the characteristics and qualities that justified its identification as part of the ONL. As I have outlined, the Rural Lifestyle zoning was already in place when the ONL was subsequently identified. In my opinion, that sequence carries an expectation that rural lifestyle development can occur while the values and identity of the ONL endure. For the reasons set out above, I do not consider that outcome would be achieved. The substantially linear pattern of occupation, fragmented management and reduced coherence of the terrace system would materially diminish the landscape values identified in my paragraph [42], and the site would no longer meet the threshold required to be an ONL.
- [116] My ultimate conclusion is therefore that rural lifestyle development can occur on this site, but achieving an outcome in which the identified ONL values endure would require a more fundamental reconsideration of the layout, particularly at or near the proposed yield. The design should begin with the landform, clustering, meaningful open gaps and coherent management, with planting and built-form controls supporting that structure rather than mitigating an established pattern.

Alternative Conditions if Consent is Granted

- [117] If, despite my concerns, the Panel determines that the proposal can proceed, I consider that additional controls would be required to reduce residual landscape effects and provide greater certainty over implementation and long-term management. These controls would be secondary safeguards. They would not alter my opinion that the underlying subdivision pattern does not adequately respond to the identified ONL values.
- [118] First, the consent should require site-specific design guidelines to be prepared and approved before development proceeds. The guidelines should establish a coordinated approach to the overall character of buildings, ancillary structures, fencing, lighting, access, domestic planting and the interface between private lots and the wider landscape framework. They should form part of the consent framework and provide clear standards against which subsequent detailed design can be assessed, rather than operating as non-binding guidance. I understand that the Bates Family Trust may seek through their evidence a defined opportunity to review and provide input into those guidelines, which would assist in maintaining a coherent overall look and feel as the development is implemented.
- [119] Second, the conditions should secure implementation of the wider landscape framework through each stage. I acknowledge that Mr Moule's proposed conditions prevent physical works for a subsequent stage from commencing until section 224(c) certification has been issued for the preceding stage. They do not, however, prevent dwelling construction, occupation and landscape establishment within an earlier stage from occurring while subdivision works proceed in the next. Each stage should therefore provide a coherent landscape outcome in its own right, without relying on later stages or the maturation of later planting to complete the landscape framework.
- [120] The landscape, restoration and open-space works required for each stage should be completed before section 224(c) certification for that stage, unless a suitably robust alternative security is approved. The conditions should clearly identify the Applicant's responsibilities, establish measurable completion and maintenance standards, require replacement of failed planting, and secure ongoing protection and management through enforceable consent notices, covenants or other legal

instruments. Detailed landscape plans, implementation and maintenance should be certified by a suitably qualified landscape architect against the outcomes required by the consent.

- [121] The conditions should also confine dwellings and ancillary buildings to the approved building areas and control building height, colours and reflectivity, garages and sheds, water tanks, lighting, fencing, accessways and domestic planting consistently with the approved design guidelines. Temporary stockpiles, construction machinery, exposed earth and unfinished works should be managed to avoid unnecessary visual intrusion during the staged development.
- [122] The relocation of the Waikato River Trail into or alongside the esplanade strip should also be secured through the consent and implemented at an early stage. If the Panel does not require relocation, the conditions should at least secure clear and convenient public connections to the esplanade strip and ensure that its landscape treatment, fencing and relationship with adjoining lots maintain the river margin as an accessible shared landscape rather than an extension of the private residential environment.
- [123] These measures would improve implementation certainty and reduce some effects associated with cumulative domesticisation, visual intrusion and the potential privatisation of the river edge. They would not, however, create the clustering, meaningful open gaps or landform-led subdivision structure identified in my evidence. Conditions and design guidelines can support an appropriate layout, but in my opinion they cannot substitute for one.

Final Conclusion

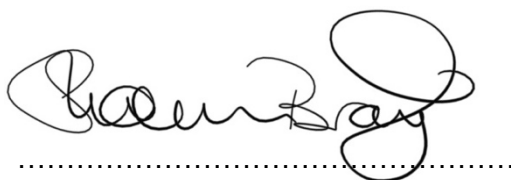
- [124] Overall, I acknowledge the changes made to the proposal, including the reduced earthworks, restoration planting, esplanade strip and built-form controls. Those measures mitigate aspects of the development, but do not resolve the effects of the underlying subdivision pattern.
- [125] As I outlined, the Rural Lifestyle zoning was already in place when the ONL was subsequently identified. In my opinion, that sequence carries an expectation that rural lifestyle development can occur while the values and identity of the ONL endure. I do not consider that outcome will be achieved with the development as it is proposed. The substantially linear pattern, insufficient clustering, lack of

meaningful open gaps, and spread of domestic occupation and management across the river terraces mean that the proposal does not, in my opinion, adequately protect the identified ONL values or achieve the landscape outcomes directed by the Rural Lifestyle Zone provisions.

[126] My primary conclusion is therefore that the proposal in its present form does not appropriately reconcile the development opportunity provided by the Rural Lifestyle zoning with the protection of the ONL. Achieving an outcome in which the identified ONL values endure would require a more fundamental reconsideration of the layout, beginning with the landform, clustering, meaningful open gaps and coherent management.

[127] If the Panel nevertheless determines that the proposal can proceed, I request that the additional controls I identify be imposed to improve implementation certainty and reduce residual effects. Those controls can support an appropriate layout, but they cannot make the present subdivision pattern landscape-led or fully responsive to the ONL.

Dated: 14 October 2026

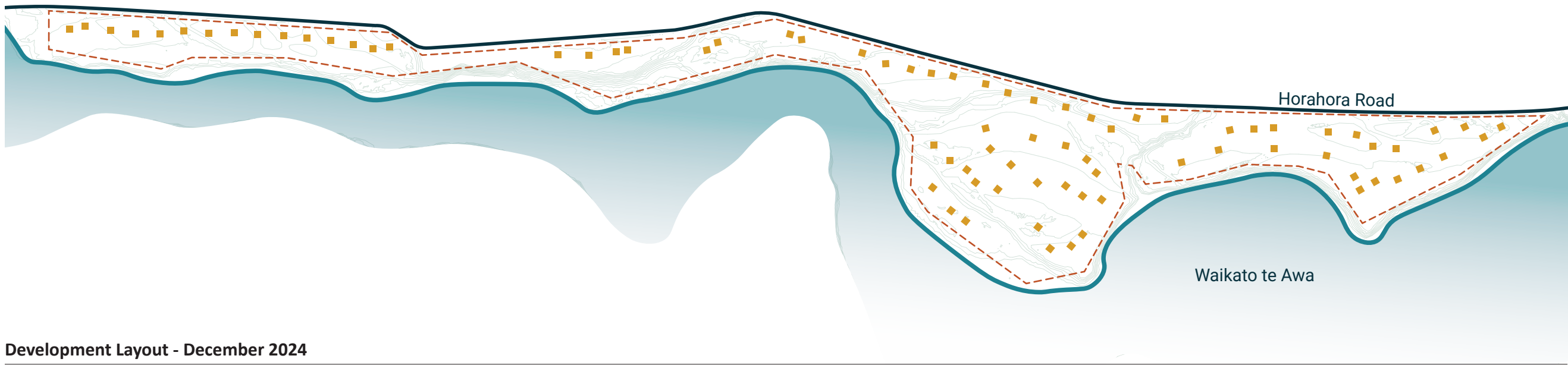
A handwritten signature in black ink, appearing to read 'Shannon Bray', written over a horizontal dotted line.

Shannon Bray

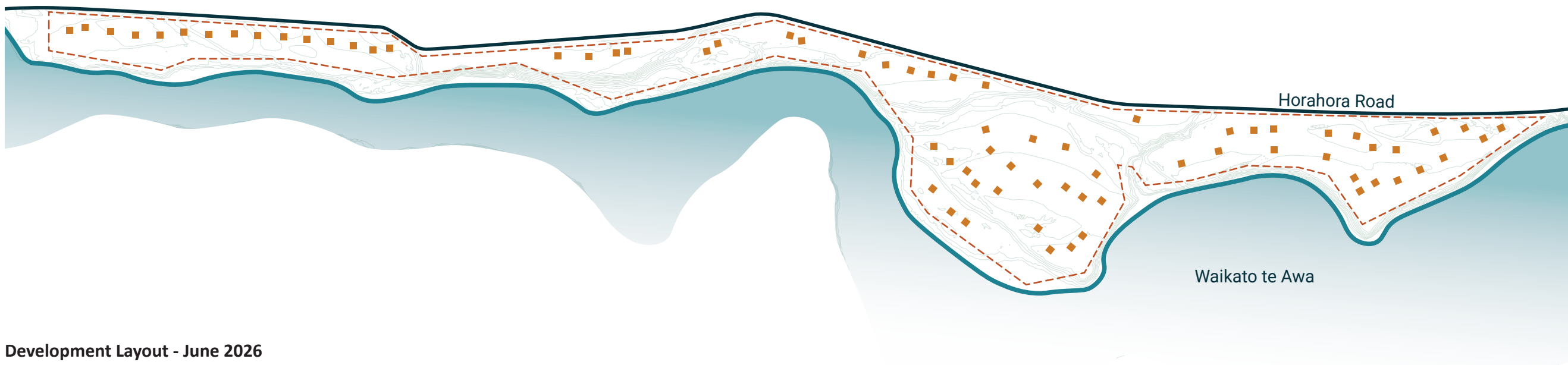


- Legend
- Indicative dwellings (2024 layout)
 - Indicative dwellings (2026 layout)
 - Indicative dwellings (clustered)
 - Vegetation
 - Views to Awa
 - Contours
 - Proposal boundary
 - Horahora Road
 - Waikato te Awa

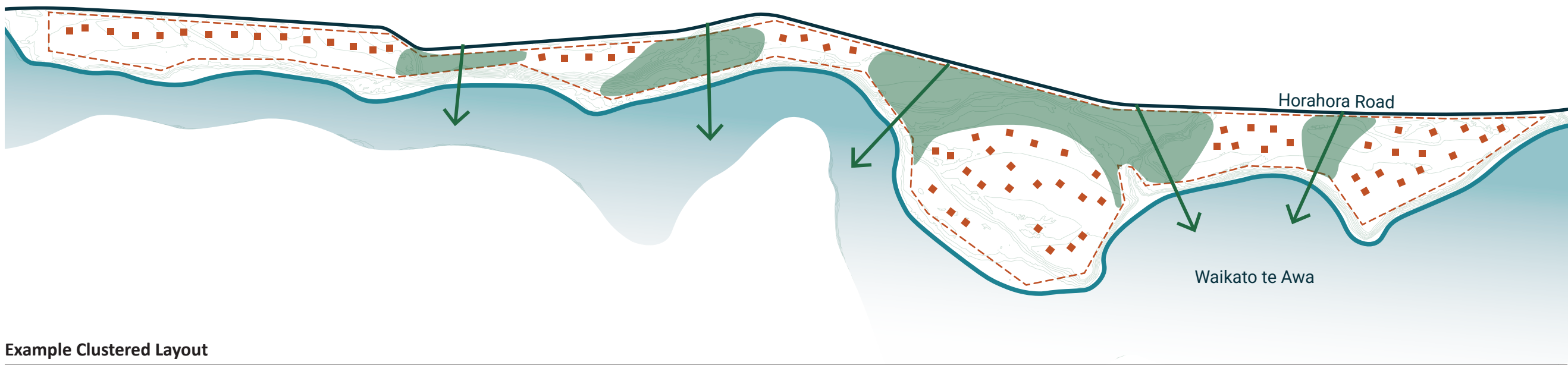
Note: These drawings are schematic only for the purpose of demonstrating development patterns.



Development Layout - December 2024



Development Layout - June 2026



Example Clustered Layout

Development Layout Schematics

2607 Horahora Road

Prepared For:
Bates Family Trust

For Information Only

13/10/26
Revision: 01
1:10,000
Print @ A3

Drawn: LB
Checked: SB
Page 1
of 1