

1. Introduction

2. We own 113 hectares of property in the Waikare Inlet, described legally as Lot 1 DP 477335, Lot 3 MLP 481893, and Lots 2 and 3 DP 383105. The address is 2195 Waikare Road, Waikare, Russell.
3. This land has been in our family for 86 years. It was purchased on 10 February 1938. We understand that there once was a dwelling, which was accessed from the sea. A number of the original tracks are still in existence throughout the property.
4. The land was used to graze sheep until 1951. From then, until the early 1980's it was used by the adjoining neighbors, to graze cattle. Periodically, they use to burn off the gorse and bush on our land until the New Zealand Forest Service prevented this from continuing in the early 1980's. The land then became progressively overgrown with gorse, tee tree and bush.
5. In late 2004, the Whooley family decided to re-settle our land and establish a place that our family could enjoy.
6. We have existing resource consents for five building sites, three houses, three sheds, a swimming pool, a recreation area, an excavation site, an orchard, 15km of tracks and 3.35km of driveway, a boat ramp, a floating jetty, landing area and boat shed, along with vegetation clearance of 1.9km for a fence line.
7. We note that the area where our main residence and driveway down to our boat ramp are located, were previously, and continue to be, excluded from the High Natural Character. However, our shed, other cleared sites, along with the driveways throughout our property which are 6m in width carriageways, have been blanketly included in the designation of High Natural Character (refer Appendix 4), Outstanding Natural Landscape (refer Appendix 5) or Outstanding Natural Character (refer Appendix 6).
8. We believe that where there are man-made structures (such as our shed), driveways and cleared sites, the "naturalness" of the landscape is diminished or removed and the term "natural" should not be applied to them.
9. **In particular, two of the building sites are 4000m² each, for which the earthworks and driveway were completed in mid-2018, and we have resource consent for a house and shed on each site. However, these two sites have been included in the Outstanding Natural Character overlay** (refer Outstanding Natural Character 109 Lot 3 DP 383105 Appendix 6).

10. Resource Consents

11. The original consent dated 18/5/07, from the Northern Regional Council was for a boat ramp, floating jetty and landing area which were completed in 2008, with the exception of the floating jetty.
12. On 21/4/09, the Far North District Council (FNDC) issued a resource consent for a building platform, house, shed, and driveway from the landing to the building site. The earthworks for our building site and the driveway from the landing to the building site were completed sixteen years ago. As part of the conditions imposed in this consent, we were required to lodge an animal and weed Pest Management Plan (refer Appendix 1) which included some 15km of tracks, approximately 3-5 metres in width, for the servicing of the bait stations and traps. To date we have created approximately 7km of the tracks.

13. On 22/8/13, the FNDC issued a resource consent which included a five year time extension of the previous consent along with a building site, a shed, a swimming pool, a boat shed, an orchard, an excavation site, a recreation area, 1.9km of vegetation clearance for a fence line upgrade, and approximately 2.9km of driveway, with up to 8m wide vegetation clearance (refer Appendix 7). These works were completed in 2018 and the house and shed were signed off in 2023.
14. On 9/5/14, the FNDC issued a resource consent which enabled us to gain access to Waikare Road, as previously we were land locked.
15. On 13/10/14, the FNDC issued a resource consent for two further building sites, houses and sheds and 1km of driveway with up to 8m wide vegetation clearance (refer Appendix 8). These works were completed mid-2018.
16. Our family want to maintain the natural values of the site, and ensure the highest standards of development to protect the coastal environment, but we also want to be able to enjoy everything that this unique environment has to offer.
17. We have planted over 3,000 native specimen trees and plants over the last 12 years.
18. Our intention is to keep our land cat and dog free and we are committed to continuing with our Pest Management Plan to eradicate possums, stoats, pigs, ferrets, rabbits and rats to bring back the bird life and conserve the habitats of this area. This is a time intensive and costly exercise.
19. Since 2008, we have incurred approximately \$2,000 annually for possum and rodent bait as well as the original costs to set-up the bait stations and traps. We service the bait stations as a minimum quarterly, 4-6 days in a row, and it takes about 2 hours per day to service them. We also spend approximately \$2,000 annually on chemicals and 12 days per annum spraying and manually removing gorse, tobacco weed and wattle.
20. We take a view that respect of the natural, archeological and cultural values is part of the family's responsibility in looking after this land, but that equally it is not a public reserve and appropriate development and the use of land must be provided for. We have worked for the past sixteen years to remove invasive weeds and pests to make our property a better environment for our family to enjoy. Since we have been undertaking these activities we have noticed a considerable increase in the number and types of birds returning to our property.
21. As already stated, our land was pastoral and used as grazing up to as recently as 1983. Since the early 1980's it has progressively become overgrown with gorse, kanuka, wattle and bush and more recently tobacco weed.
22. We know that this land was pastoral grazing land from 1867-1983 some 116 years.
23. We feel that we were not treated fairly when the FNDC zoned our land as Outstanding Landscape back in 1995. It is our belief that this land should never have been zoned Outstanding Landscape considering that the vegetation that is found on our land can be found at numerous locations throughout Northland (including the properties that are adjacent to ours) and the fact that whilst in our family ownership it was farmed for some 45 years.
24. The effect of having this land already classified as Outstanding Landscape has been that the Council has imposed additional costs and lengthy delays for us to gain resource consents to date. The implications of the proposed overlays of High Natural Character,

Outstanding Natural Landscape and Outstanding Natural Character are potentially very significant and adverse – compelling costly and arguably unnecessary applications for further resource consents.

25. We feel that it is unfair having the FNDC blanketly classifying our land in this manner, restricting what we can do on what is privately owned land, and imposing extra layers of costs.
26. We consider that the FNDC should not blanketly map our property as High Natural Character, Outstanding Natural Landscape or Outstanding Natural Character and impose all the restrictions and extra costs that go with these classifications.
- 27. The photos that the mapping process has been based on (refer to Appendix 3) are woefully out of date. The photo used for our property appears to have been taken pre March 2010, being at least 14 years out of date. It does not reflect the subsequent consented works that has already been completed over the last 16 years. Attached in Appendix 2 are a series of google photos of our property from 2000 to 2019 which clearly shows the progress we have made on the consented works on our property.**
28. We are not aware that anybody has physically walked over our property as part of this planning process and that reliance has been made on a woefully out of date aerial photography as the only basis for claims for the blanket classifications.
29. That geographical identification, without physically walking over our property and respect to existing land uses, is insufficient in isolation to blanket classifications on our property.
30. We are not commercial developers. This land, as previously stated has been in the family for 86 years and we wish to continue to enjoy it and preserve it for future generations.
31. The vegetation that is currently on our land grew whilst in our family ownership. We love healthy specimens of trees and over the last twenty years we have consistently worked hard and spent a lot of money to enhance our property. By proposing to put these blanket classifications on our land, this will result in taking away our property rights on what is privately owned land.
- 32. Natural Features and Landscapes**
33. We have had resource consents in place since 2007 and have progressively completed the consented works since then.
- 34. We oppose our land been subject to the suggested blanketed “outstanding areas” (i.e. High Natural Character, Outstanding Natural Landscape and Outstanding Natural Character) in the proposed Regional Policy Statement. In particular, classifying a large part of Lot 3 DP 383105 as Outstanding Natural Character 109 will prevent us from completing the works that we already have consent for and we have family members that wish to build on these sites in the future.**
35. We would like the Council to remove the identified “outstanding areas” from our private land. We are submitting on having the following proposed blanket classifications removed: Reference 57 Outstanding Natural Landscape; Reference 452 High Natural Character; and Reference 109 Outstanding Natural Character.
36. This area is already Zoned General Coastal under the FNDC District Plan, with an Outstanding Landscape Feature.

37. There is already a large area of publicly owned bush conserved in this area, being DOC land and the Russell Forest. It is difficult to understand why there are 'Outstanding Natural Character' and 'High Natural Character' notations mapped over our privately owned and already developed property, whereas for the Russell Forest, that has huge native trees, it has only been designated as High Natural Character.
38. There is little or no visibility of the Outstanding Natural Character 109 area identified on our property as viewed from public viewing points on land. The Waikare Inlet at this point is shallow, and generally inaccessible. It is not subject to boat traffic. Opportunities to view the subject site are very limited.
39. We execute on our conservation values on our property through actively implementing our ongoing pest and weed management.
40. We already have Land Use Consent from the FNDC to settle our family property, with existing consent conditions (including the Pest Management Plan).
41. The FNDC District Plan already has quite strict rules covering any development in this area.
- 42. We submit that a fundamental criteria for mapping 'Natural Character' and 'Natural Landscape' is that such notation should not include extensive area, particularly where there is little or no access for the public, and little or no public viewing points. We further submit that it should not include where there are man-made structures (such as our shed), driveways and cleared sites.**
43. The Coastal Areas, Natural features and Landscapes, have been subject to District Plan rules restricting development since 1996.
- 44. Coastal Environment**
45. In addition, the adjoining mangroves have been mapped as Outstanding Natural Landscape, and the adjoining swamp land has been marked as Outstanding Natural Character 110.
46. The adjoining swamp land was farmed as pastoral land and only became a swamp towards the end of last century.

47. The decisions we seek are:

48. The removal from the proposed district plan of the blanket mapping over our property of the High Natural Character 452; and
49. The removal from the proposed district plan of the blanket mapping over our property of Outstanding Natural Landscape; and
50. The removal from the proposed district plan of the blanket mapping of the Outstanding Natural Character 109 and Outstanding Natural Character 110.
51. We further seek that where there are man-made structures (such as our shed), driveways and cleared sites, the naturalness of the landscape is diminished or removed and that the term “natural” should not be applied to them.

52. Appendices:

53. Appendix 1 – Pest Management Plan
54. Appendix 2 – Google photos from different eras (2000 – 2019)
55. Appendix 3 – FDNC photo used to overlay
56. Appendix 4 - Photo of High Natural Character overlay
57. Appendix 5 – Photo of Outstanding Natural Landscape overlay
58. Appendix 6 – Photo of Outstanding Natural Character overlay
59. Appendix 7 – Approved Plan 22/8/13
60. Appendix 8 – Approved Plan 13/10/14

Denis and Jennifer Whooley
S75 – Natural Features and Landscapes, Coastal Environment

Appendix 1 – Pest Management Plan

**Pest Management Plan, Whooley
Lots 1 and 3, Okauru No. 413N Block (now DP 383105), Waikare Road**

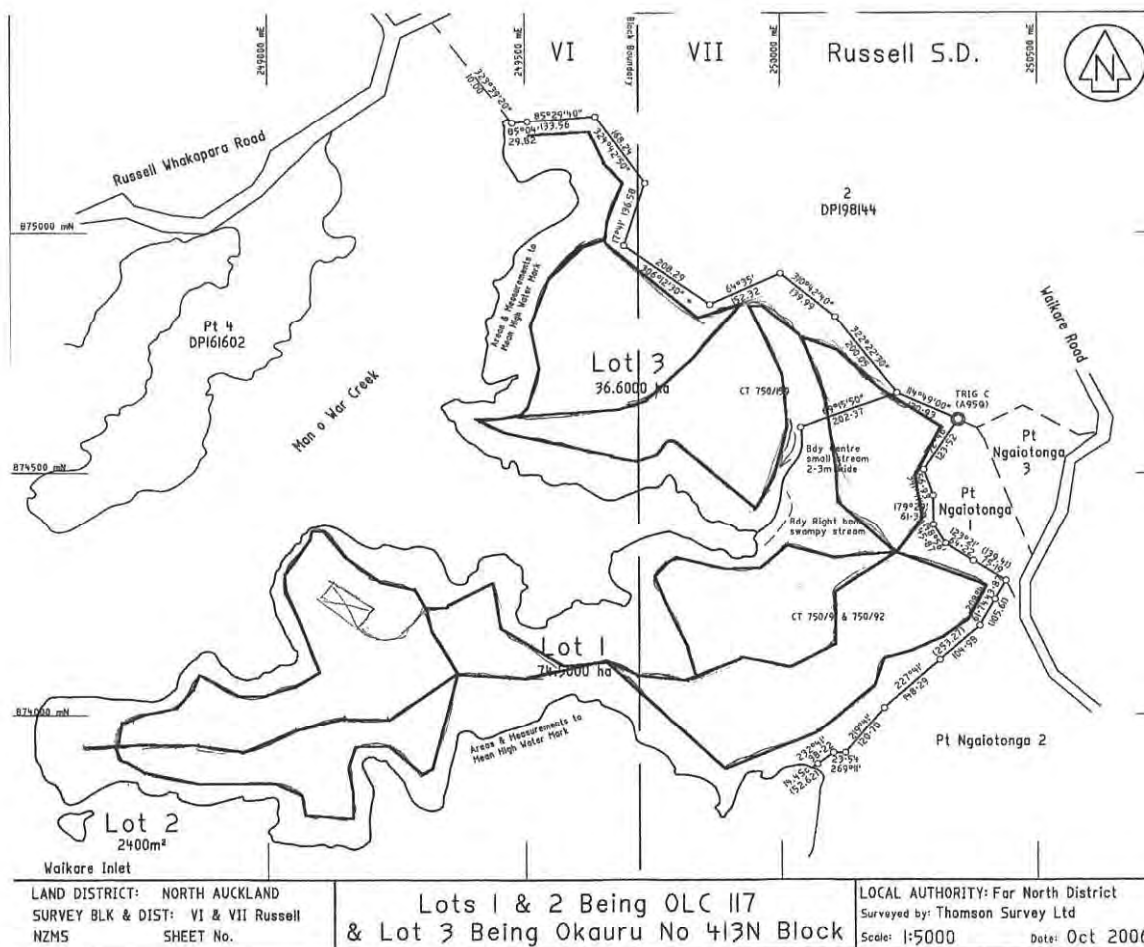
Denis Whooley commissioned this animal and weed pest management plan to comply with the relevant conditions in resource consent RC – 2080267 – RMALUC:

11. "provide a pest and weed management plan to the satisfaction of Council's Resource Consent Manager, and this plan shall be implemented for the duration of the activity."

13. "The consent holder shall not allow the introduction of cats to the site, and any dogs introduced shall be under control at all times."

The plan below (Figure 1) identifies Lots 1 and 3 of c.111 hectares which will be called the Whooley block in this report.

Figure 1: Title map with proposed pest management tracks marked as _____



This report has three sections:

1. Preamble which discusses the land cover and ecological values of Lots 1 and 3.
2. Integrated animal pest management plan
3. Weed management plan

1. PREAMBLE

North Island brown kiwi, banded rail and North Island fernbird are found on this property. Many other species will be there as well, with Australasian bittern and tomtit among the more rare. The Whooley block is part of Q05/001 Eastern Bay of Islands Estuary and also part of Q05/003 Russell Forest (Booth 2005, Natural Areas of Whangaruru Ecological District: pp.51-54 and 56-61 respectively). Copies of both reports are attached as Appendix A. Also, the Russell Peninsula Kiwi Project extends to Gordon Road which runs northwards from the Russell-Whakapara Road to Clendon Cove, less than one kilometre from this property. This site has good ecological values, and should be treated accordingly.

Two site visits were made, one by myself to identify the property, its characteristics and the likely layout of the pest management system. The other visit was by Terry Johnson, a senior pest management contractor working for the NZ Kiwi Foundation. The second visit was to determine the best way to set-up the pest management system for effect, utilizing existing tracks and old logging roads, and identifying the areas that are necessary to have the coverage for this system to work successfully.

The pests of the variously threatened species listed above are rats, possums, cats, mustelids (stoats, weasels, ferrets), dogs, and pigs. Rats and possums can be controlled primarily by toxins in bait stations. The other pests must be trapped, which is the only effective method apart from the shooting of feral pigs and wandering dogs. Animal pest management must consist of an integrated system that will deal with all the pests identified above. Rats and possums are important in terms of the health of the bush as well, and should be controlled for this purpose as well as for the benefit of the wildlife.

Several weed species were identified on the site visits. The most prominent were gorse, pampas, hakea, and tobacco weed, but there is likely to be other weed species discovered over time. Light gorse and hakea infestations exist throughout the eastern part of Lot 1. These weeds are typical of the land cover and terrain of many blocks around the Bay of Islands where land cover is most commonly kanuka/manuka with various broadleaf and podocarp species slowly becoming more evident as the reversion occurs of the land from rough pasture back to bush.

2. INTEGRATED PEST MANAGEMENT SYSTEM FOR WHOOLEY, WAIKARE

The elements of the integrated pest management system to be installed on the Whooley block are as follows:

- To establish a pest control track system, generally using the ridges and tracks identified approximately by the black lines on the map in Figure 1. The owners are to construct tracks suitable for an ATV to safely negotiate, based on the opening of old, now dis-used farm tracks on Lots 1 and 3. The spurs off the track system are designed to obtain maximum coverage for the pest control system. The construction of the tracks is to be sympathetic to the land cover and wildlife on Lots 1 and 3: a small digger or bulldozer can be used for constructing the tracks but the track must not exceed 2.5 metres in width and is to be located on the old dis-used farm tracks and pig trails on Lots 1 and 3.
- To develop a permanent bait station system to deal with ship rats, water rats and possums. This will consist of up to 70 small Philproof (or similar) bait stations located at least 700

mm off the ground. The bait stations will be serviced three times in each of four pulses per year. Appropriate toxins will be used for the various pulses with Pestoff, Ratabate, Feracol, and possibly Racumin alternating for the rat control and Feratox (encapsulated cyanide) for possum control.

- To establish rat tunnels to control water rats *Rattus norvegicus*. Up to 50 tunnels will be located around the low-lying areas which contain the prime habitat for water rats as well as the threatened species on site. The same toxins will be used as in the bait stations (for rats control).
- To establish a trapping network consisting of up to 30 traps, variously DOC 200, No.6 Fenn traps under plastic covers and SA cat traps as required. Servicing of the trapping network will be three-weekly.
- A live-capture dual purpose pig and dog trap will be located on the property and used as required, being checked daily when set.
- A report on the toxins used and catches made will be sent annually to Far North District Council Consents Manager.

The integrated pest management system will be installed in 2008 and early 2009 as weather and ground conditions permit, and will be serviced as specified thereafter. Contractors must not bring dogs on to the Whooley block at any time unless kiwi-averse dogs are used by pig hunters to attempt to control wild pigs on the block.

This integrated pest management system will be established and maintained by the Whooley family, with assistance in training, and occasional servicing from the NZ Kiwi Foundation as required. For example, when the Whooleys cannot service the bait and trapping system, a contractor from the NZ Kiwi Foundation will do the work on the expected schedule.

3. WEED MANAGEMENT PLAN

The four main weeds identified in my survey are gorse, hakea, tobacco weed, and pampas. However, other weeds are likely to exist such as jasmine, tradescantia, wattle, moth plant, and ivy. The bullet points below identify the processes to be used for each weed species, with the additional weeds listed for the possibility of their likely existence.

- Gorse: Generally leave to die out as the canopy eventually closes. For removal, cut the gorse stumps close to the ground and poison the stumps with 20:1 Tordon:diesel, primarily where gorse interferes with establishing the pest management tracks, other tree planting, and those examples of gorse which are likely to cause further spread.
- Hakea: Similar to gorse, hakea should be removed when constructing the pest management tracks – being treated with the same method as for gorse. In the long term, the hakea will die out with canopy closure.
- Tobacco weed: Cut and paint stumps with Tordon as above. As possible, pull all young plants. Inspect and pull annually. Tobacco weed is one that persists due to birds dropping the seeds. There will always be tobacco weed on a block such as this.
- Pampas grass: Pampas is prolific and thrives in relatively open north-facing dry places. Treatment is to spray with 2 - 3% glyphosate initially and then re-visit and re-spray missed or new growth within three months, and again three months later.
- Tradescantia (wandering dew): Spray with Escort by handpump. Check and re-spray missed areas/spots several times until eradicated.
- Black wattle: Cut “V” around the circumference of the trunk less than 600 millimetres from the ground and spray fresh cut with Tordon and diesel 20:1 ratio. Pluck out any new plants as seen each year.

The weed eradication and management plan will gradually remove seeds and source material from Lots 1 and 3. However, re-invasion of various weed species will continue due to bird droppings and wind dispersion. The Whooley family will implement the weed management programme and will continue the process as part of the RC conditions.

A handwritten signature in black ink, appearing to be 'GB', with a long horizontal flourish extending to the right.

Dr. Greg Blunden
Biodiversity Management Limited
September 2008

Denis and Jennifer Whooley
S75 – Natural Features and Landscapes, Coastal Environment

Appendix 2 – Google photos from different eras (2000 – 2019)

2000



LINZ NORTHLAND 1.25m RURAL AERIAL

2014



LINZ NORTHLAND 0.4m RURAL AERIAL



2016



GOOGLE EARTH

2019



GOOGLE EARTH

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AERIAL IMAGES OVER LOT 1 DP 477335 & LOT 3 DP 383105 2195 WAIKARE RD

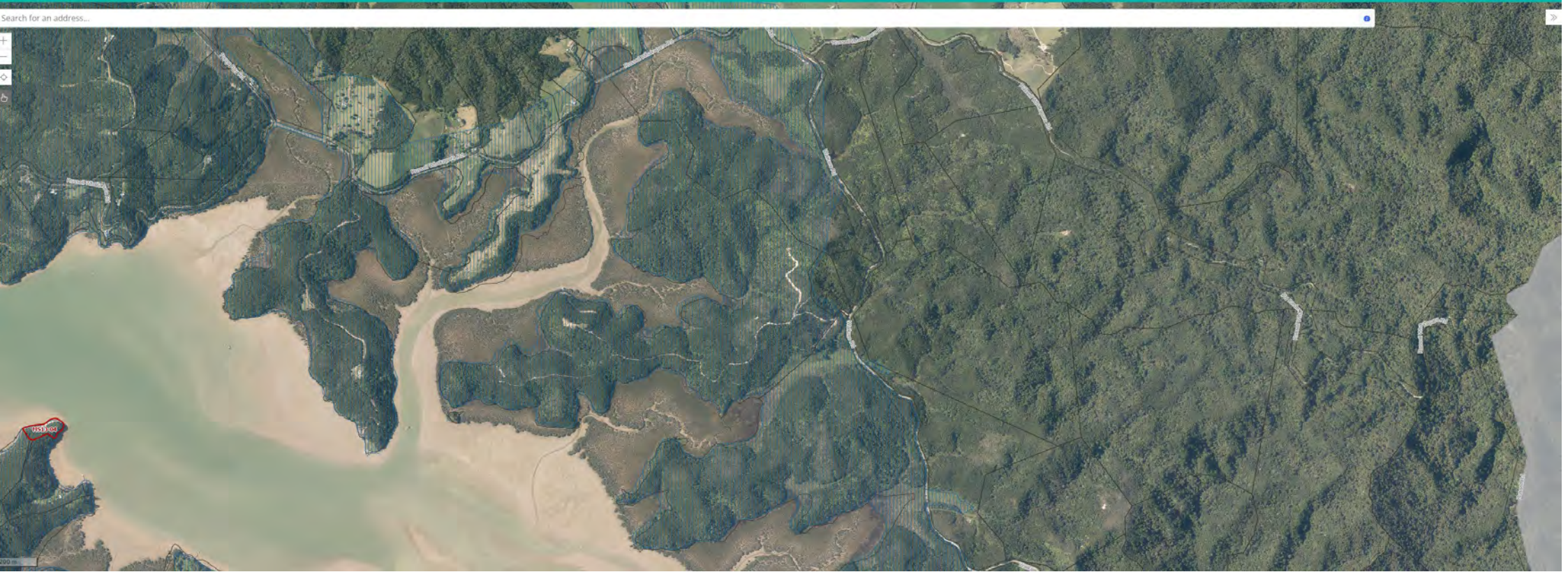
PREPARED FOR: WHOOLEY

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Design				
Drawn	EM 04/07/24	NTS		A3
Approved				
Rev				
8359 IMAGES.LCD				

Surveyors
Ref. No:
8359
Series
Sheet 1 of 1

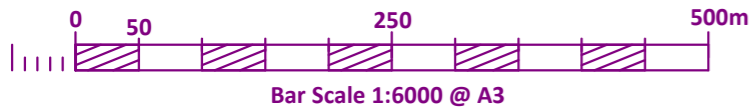
Denis and Jennifer Whooley
S75 – Natural Features and Landscapes, Coastal Environment

Appendix 3 – FDNC photo used to overlay



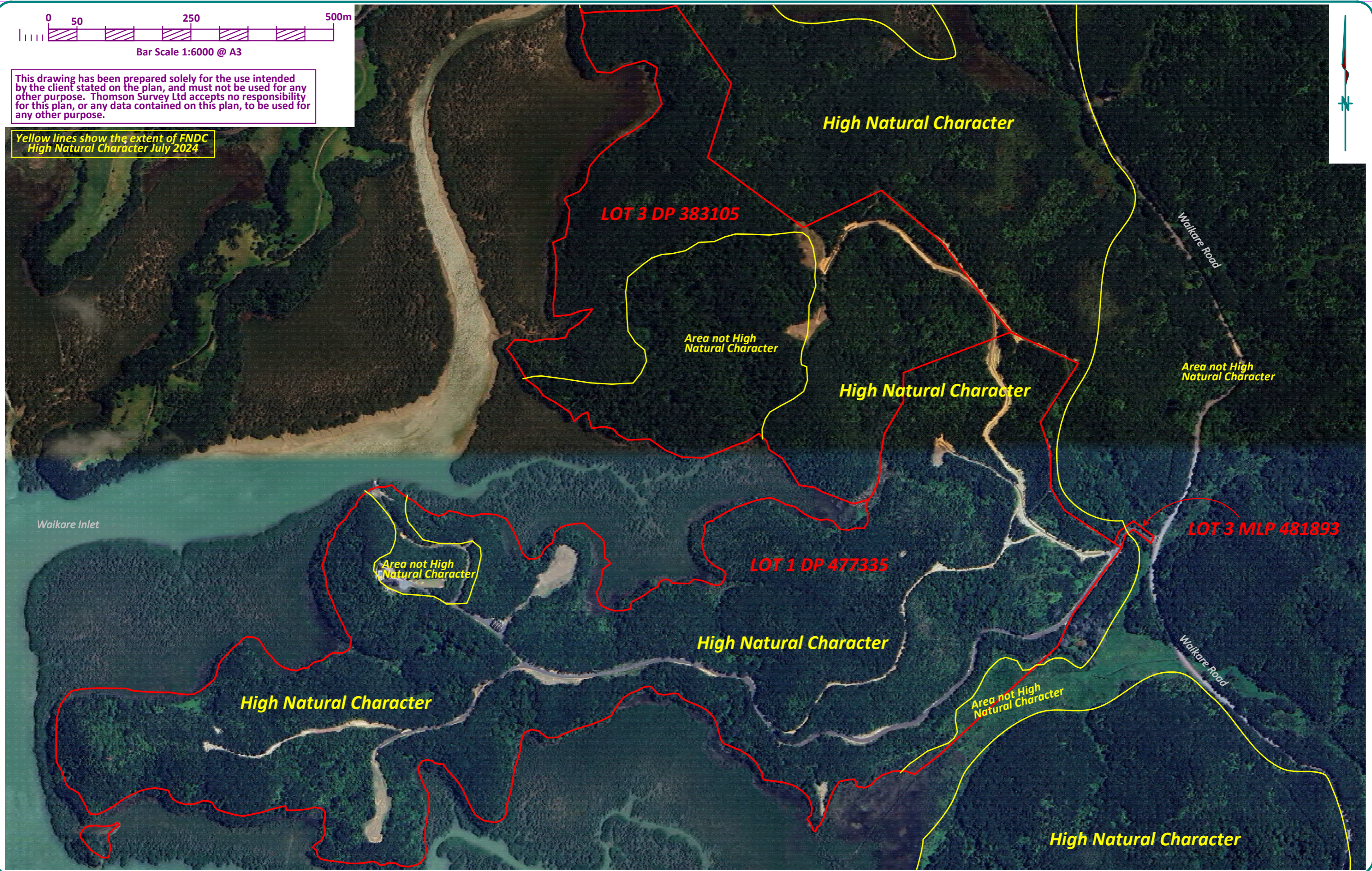
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Appendix 4 - Photo of High Natural Character overlay



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Yellow lines show the extent of FNDC High Natural Character July 2024



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**FNDC HIGH NATURAL CHARACTER OVER
 JAN 2024 GOOGLE EARTH IMAGE**

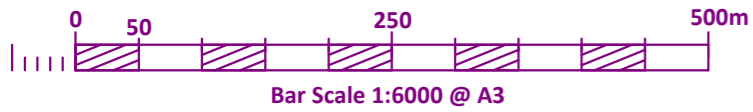
PREPARED FOR: D, WHOOLEY

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Approved				
Rev				
8359 HNC - 2024.LCD				

Surveyors Ref. No:
8359

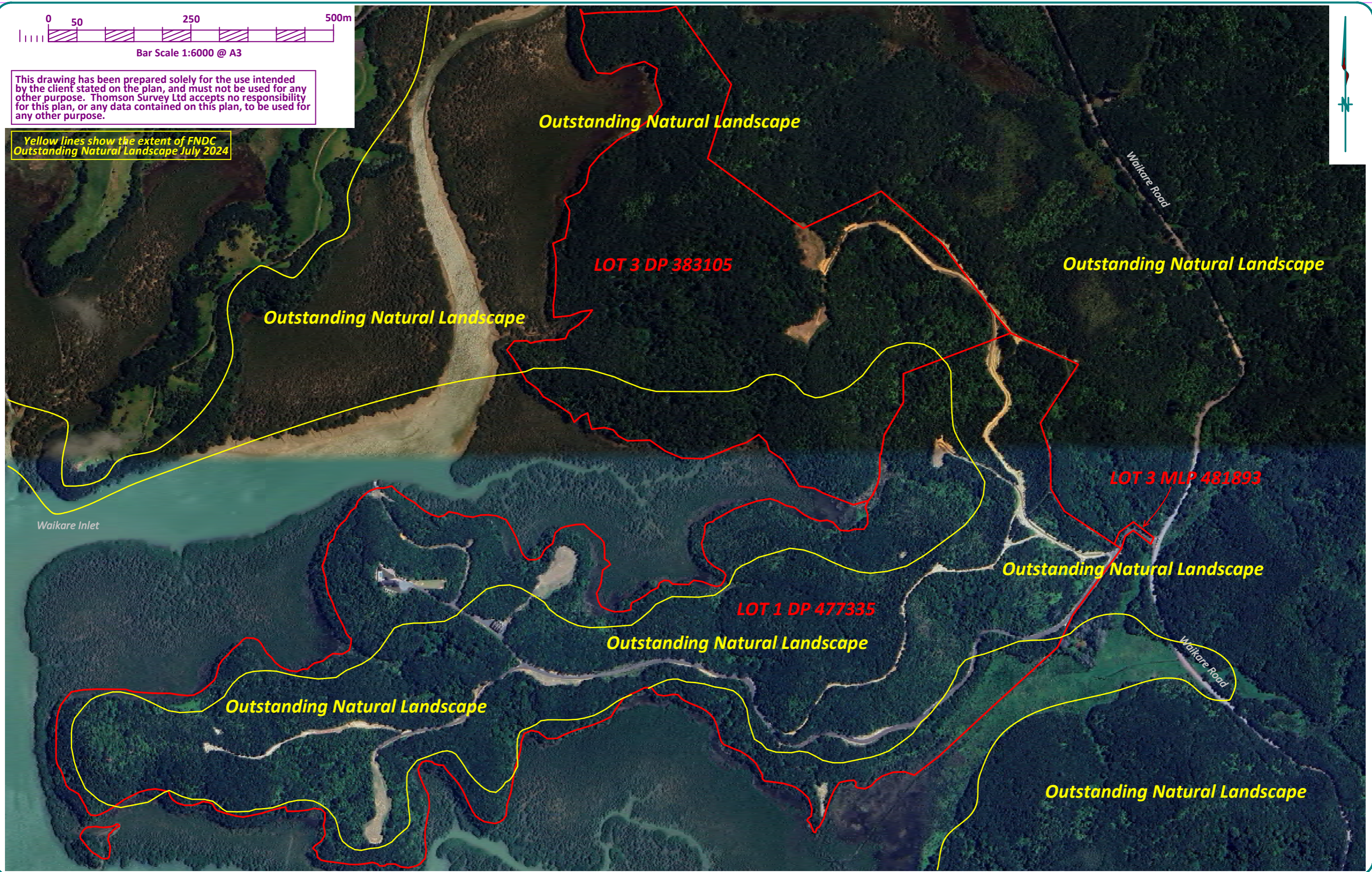
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Appendix 5 – Photo of Outstanding Natural Landscape overlay



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Yellow lines show the extent of FNDC Outstanding Natural Landscape July 2024



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**FNDC OUTSTANDING NATURAL LANDSCAPE OVER
 JAN 2024 GOOGLE EARTH IMAGE**

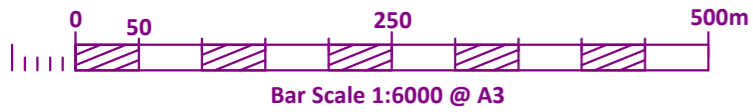
PREPARED FOR: D, WHOOLEY

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Approved				
Rev			8359 Outstanding Natural Landscaper.LCD	

Surveyors Ref. No:
8359

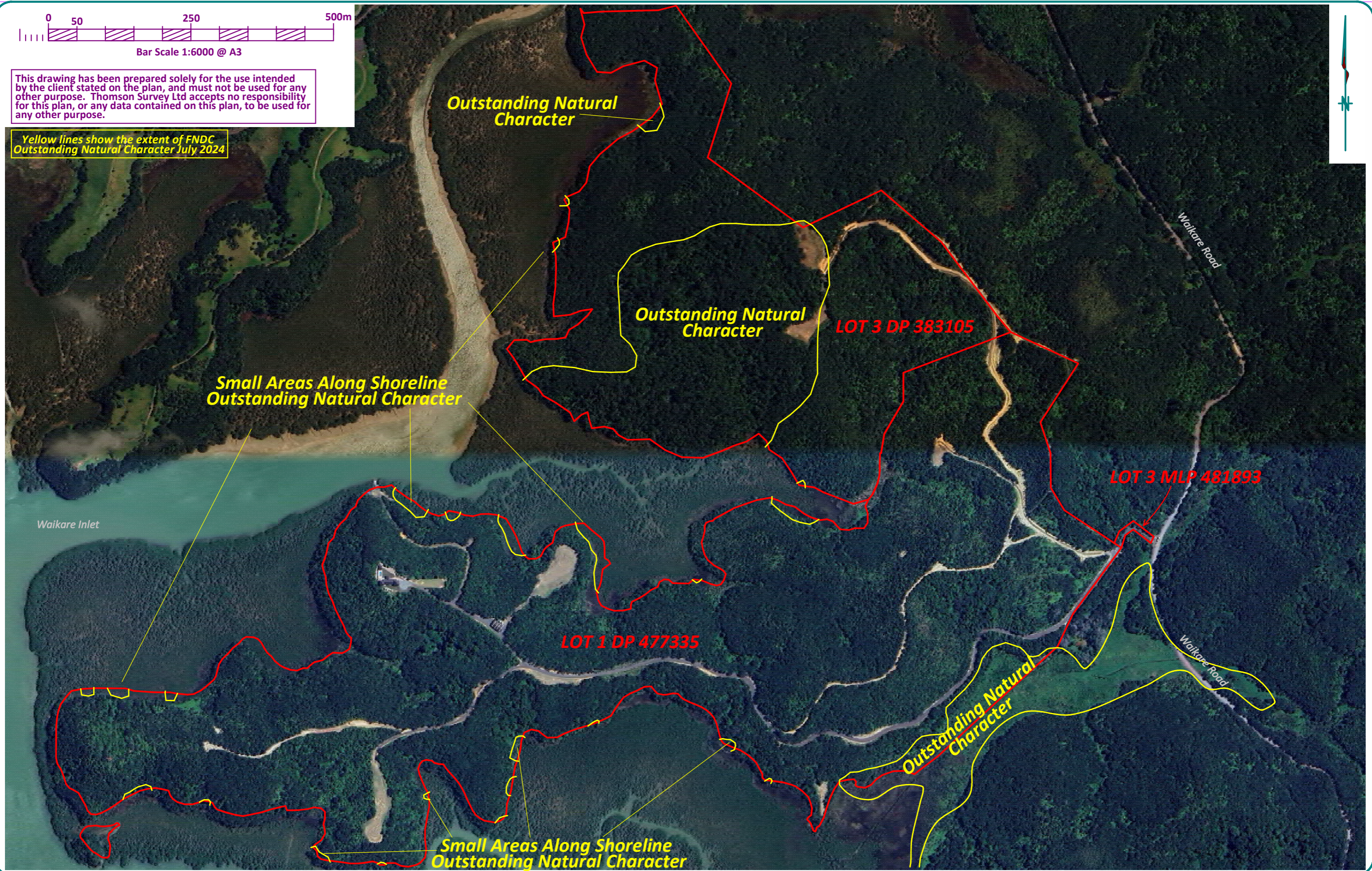
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Appendix 6 – Photo of Outstanding Natural Character overlay



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Yellow lines show the extent of FNDC Outstanding Natural Character July 2024



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**FNDC OUTSTANDING NATURAL CHARACTER OVER
JAN 2024 GOOGLE EARTH IMAGE**

PREPARED FOR: D, WHOOLEY

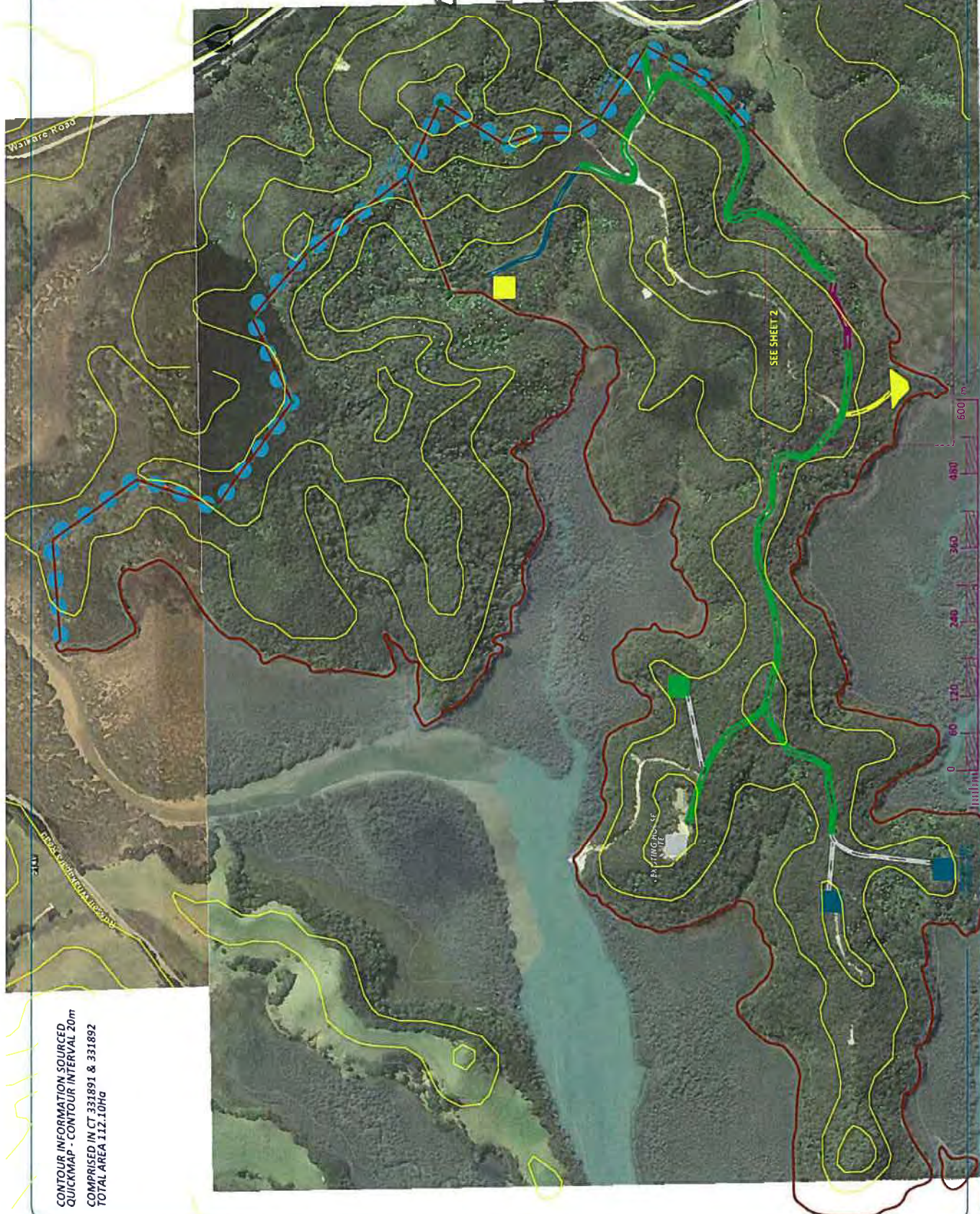
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Drawn	SL/EM	18.07.24	1:6000	A3
Approved				
Rev				
8359 Outstanding Natural Character.LCD				

Surveyors
Ref. No:
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Denis and Jennifer Whooley
S75 – Natural Features and Landscapes, Coastal Environment

Appendix 7 – Approved Plan 22/08/13

CONTOUR INFORMATION SOURCED
QUICKMAP - CONTOUR INTERVAL 20m
COMPRISED IN CT 331891 & 331892
TOTAL AREA 112.10Hc



DRIVEWAY A - UPGRADE

TOTAL DISTANCE 2.3km
EXISTING 2.5m WIDE FORMATION
PROPOSED WIDENING TO AVERAGE 5.5m
PROPOSED 8m WIDE VEGETATION CLEARANCE
PROPOSED BASE COURSE DEPTH 200mm

80m LENGTH OF DRIVEWAY A
REQUIRES ADDITIONAL EARTHWORKS
CUT FACE > 1.5m

DRIVEWAY B - PROPOSED

DISTANCE 285m
PROPOSED 3m WIDE FORMATION
PROPOSED 6m WIDE VEGETATION CLEARANCE
PROPOSED BASE COURSE DEPTH 200mm

DRIVEWAY C - EXISTING

240m LENGTH, 2.5m WIDE FORMATION

APPROVED PLAN

PLAN REF: *Scale*
C 2130174 Date 22-8-13

FENCELINE - UPGRADE

●●●●●

TOTAL DISTANCE 1.9km
PROPOSED 2.5m WIDE VEGETATION CLEARANCE
FOR UPGRADING EXISTING FENCE

BUILDING SITE - PROPOSED
PROPOSED VEGETATION CLEARANCE
OF 4000m²

BUILDING SITE - EXISTING

RECREATION AREA - PROPOSED
PROPOSED 100m by 20m VEGETATION
CLEARANCE

PROPOSED ORCHARD
PROPOSED CLEARANCE 100m by 25m

EXCAVATION SITE - PROPOSED
PROPOSED 80m LONG 3m WIDE ACCESS
20m SETBACK FROM MHWs

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**PROPOSED WORKS ON
LOT 1 & 3 DP 383105
WAIKARE RD**

PREPARED FOR: WHOOLEY

Survey	Name	Date	ORIGINAL
Design	SL	17.12.12	SCALE SHEET SITE
Drawn	SL	16.07.13	1:6000 A3
Approved	SL	16.07.13	
Rev	SL	16.07.13	

8359 SCHEME 1,1,C,D

Surveyors
Ref. No: **8359**
Series
Sheet 1 of 2

Denis and Jennifer Whooley
S75 – Natural Features and Landscapes, Coastal Environment

Appendix 8 – Approved Plan 13/10/14

EXISTING TRACK TO BE CLEARED AND UPGRADED

LENGTH 1000m
PROPOSED 5m WIDE FORMATION
PROPOSED 5m WIDE VEGETATION CLEARANCE
PROPOSED 8m WIDE VEGETATION CLEARANCE
PROPOSED BASE COURSE DEPTH 200mm

PROPOSED ADDITIONAL DWELLING SITE
EACH SITE TO BE APPROX 80m BY 75m
(6000m²)

BOUNDARY MARKED JUNE 2014
INDICATED BUILDING SITE
POSITION RECORDED BY GPS 11.06.2014

APPROVED PLAN

PLANNER: *E. Seale*
RC 2150024 Date 13-10-14

CONSULTED ACTIVITIES
REFER TO RC 2150174

RC 2140285 FOR ACCESS TO
WAIKARE ROAD

LOCATIONS OF WORKS ARE INDICATIVE ONLY.
LOCATIONS MAY BE SUBJECT TO CHANGE BASED
ON DESIGN AND PHYSICAL FEATURE RESTRAINTS



Survey	Name	Date	ORIGINAL	SHEET
Design	SI	17.12.12	SCALE	SHEET
Drawn	SI	17.12.12	1:6000	SIZE
Approved	SI	4.07.14		A3
Rev.	SI	4.07.14		
8359 SCHEME 3 LCD				

**PROPOSED ADDITIONAL DWELLINGS & WORKS
ON LOT 3 DP 383105 & WORKS ON LOT 1 DP 383105**
WAIKARE RD

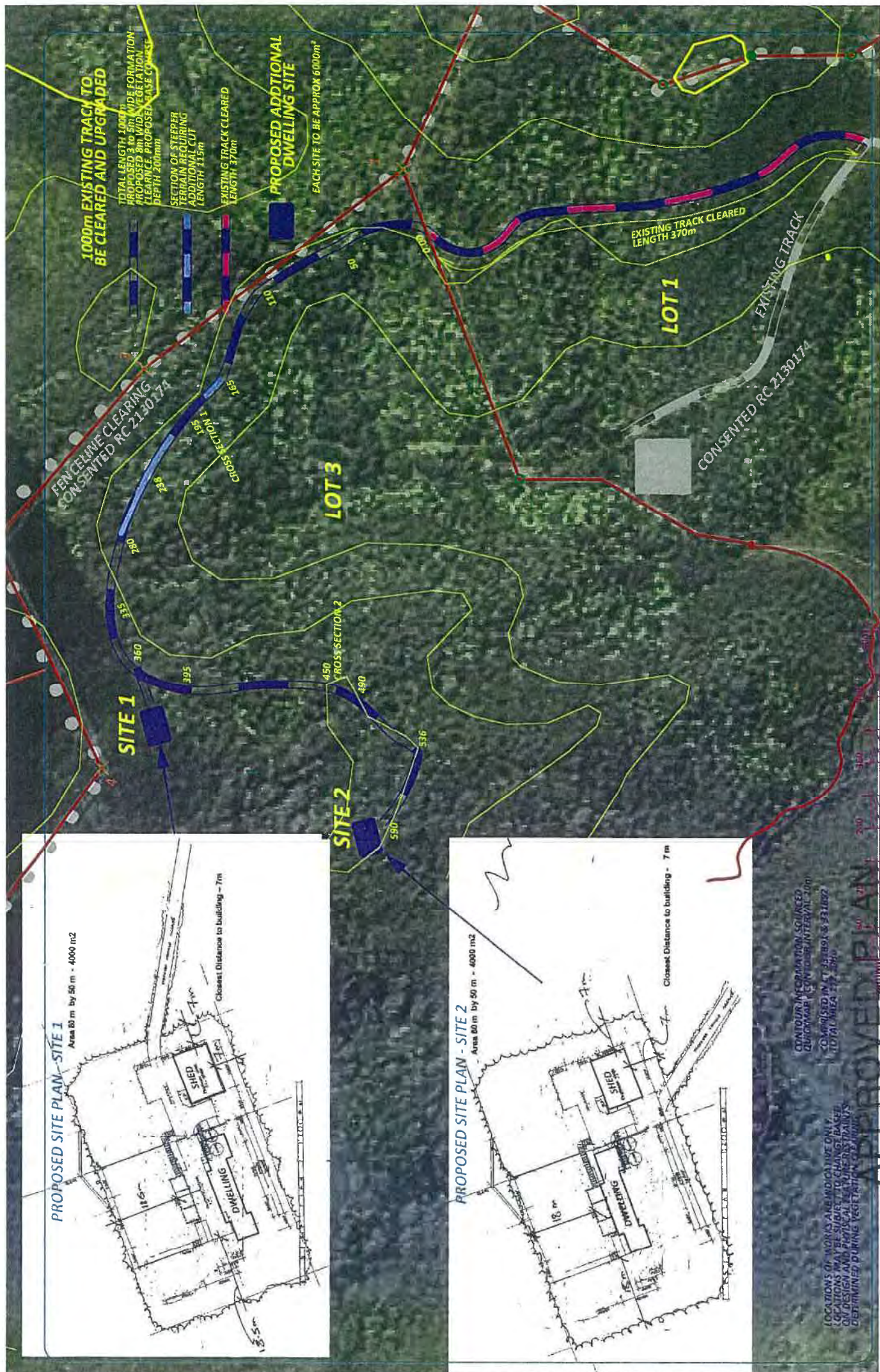
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Ph: (09) 4077360 Fax: (09) 4077322

CONTOUR INFORMATION SOURCED
QUICKMAP - CONTOUR INTERVAL 20m
COMPRISED IN CT 331891 & 331892
TOTAL AREA 112.10Ha

Surveyors Ref No: **8359**
Series
Sheet 1 of 2



Survey Name	Date	Original
Scale	Sheet	Size
1:2000	A3	

Survey Ref. No.	8359
Series	Sheet 2 of 2

Survey Descrip	Drawn	SI	17.12.12
Approved	SI	26.08.14	
Rev	SI	26.08.14	

APPROVED PLAN
ON LOT 3 DP 383105 & WORKS ON LOT 1 DP 383105
WAIKARE RD
PREPARED FOR: WHOOLEY

Date 13-10-14

THOMSON SURVEY
LIMITED
315 Kerikeri Rd
P.O. Box 372 Kerikeri
Email: kerikeri@tsl.co.nz
Ph: (09) 4077360 Fax: (09) 4077322

Registered Land Surveyors, Planners
and Design Engineers

LOCATIONS OF WORKS ARE INDICATIVE ONLY.
LOCATIONS MAY BE SUBJECT TO CHANGE BASED
ON DESIGN AND PHYSICAL FEATURES OF THE SITES
DETERMINED DURING VEGETATION REMOVAL.

CONTOUR INFORMATION OBTAINED
FROM MAPS AT 10m INTERVALS
CONTOUR INTERVALS: 10m
TOTAL AREA: 17,389.4 & 83,102.2
TOTAL AREA: 100,491.6