

**BEFORE THE EXPERT PANEL APPOINTED UNDER THE FAST-TRACK
APPROVALS ACT 2004**

Under The Resource Management Act
1991 (the **Act**)

In the Matter of the substantive application for
approvals for the Mt Iron
Junction Housing Scheme at
237 Wānaka-Luggate Highway,
Wānaka.

Between **MT IRON JUNCTION LIMITED**
Applicant

And **CM AND JC MORGAN FAMILY**
TRUST
Invited Party

COMMENTS OF INVITED PARTY

DATED 19 JUNE 2026



GALLAWAY COOK ALLAN LAWYERS

Bridget Irving/Hannah Perkin

bridget.irving@gallowaycookallan.co.nz

hannah.perkin@gallowaycookallan.co.nz

PO Box 143

Dunedin 9054

Ph: (03) 477 7312

Fax: (03) 477 5564

COMMENTS OF INVITED PARTY

May it please the Panel:

1. These comments are made on behalf of the owners of [REDACTED]
[REDACTED] is legally
[REDACTED]. It is owned by the
CM and JC Morgan Family Trust (The Morgans).
2. The Morgans are directly affected by the Mt Iron Junction Limited Proposal (Proposal) as adjacent landowners whose property will be materially affected by the proposed form, scale and intensity of development, particularly along the boundary interface with their land. They are also concerned about the adverse effects on the Mt Iron Outstanding Natural Feature.
3. The Morgans do not oppose development of the site in principle. But consider that the Proposal will give rise to significant adverse effects are out of proportion with the benefits of the proposal. The Morgans believe that it would be possible for a consent to be granted with amendments that address the adverse effects whilst responding to housing demand within Wanaka.
4. These comments are filed with support if independent Landscape Comments provided by Anne Stevens.
5. It is the Morgan's view that a response to housing demand should:
 - (a) not come without appropriate care, consideration and management of the environment within which the Proposal sits; including:

- (i) The application site's significance and prominent location at the 'entrance' to Wanaka, and at the foot of Mount Iron, a recognised outstanding natural feature.
 - (ii) Surrounded by predominantly large lot residential or rural residential character, with rurally focussed commercial and recreational activities.
- (b) not ignore the significant increase in housing capacity that has been precipitated by the Urban Intensification Plan Change recently decided by the Council. Those changes will affect the 'benefits' that this proposal can have.

The Morgans' Property

6. The Morgan's Property is approximately 4000m² located within the Large Lot Residential Zone directly adjacent to the application site. It contains a dwelling and shed for storing equipment and vehicles. In the southeastern corner it contains various fruit trees, glass house and vegetable patch.
7. Old Racecourse Road is a cul de sac containing properties of various sizes between ~1500m² and 4000m². It is relatively quiet and has a semi-rural amenity. Along the southern boundary of the Morgan's property is an existing shelter planting that is approximately 4m tall. It provides screening of the surrounding infrastructure (particularly the state highways whilst maintaining distant views to the south of Criffel Range and the wider hills surrounding the Upper Clutha.

Overview of concerns

8. The Morgans principal concerns are:

- (a) Adverse effects on amenity and quiet enjoyment of their property, including visual dominance, loss of privacy, and significant changes to the character of their environment. The Proposal represents a significant departure from previous proposals for the site. The introduction of development on to Lot 3 DP359869 results in development directly adjacent to their property, rather than it maintaining at least a 40m separation.
- (b) Insufficient setbacks and excessive building intensity along the boundary adjoining / facing their property.
- (c) Potential reverse sensitivity effects associated with high density development along their boundary
- (d) Poor treatment of the interface between the proposed high-density development and the established low-density character of the surrounding area, and the outstanding natural feature of Mt Iron.
- (e) Inadequate and inaccurate assessment of effects on their property, including a failure by relevant experts to undertake a site visit and properly understand the property's values and outlook. The Morgans note that there has been no consultation with them regarding this proposal.
- (f) Wildfire risk, including:
 - (i) increased risk of ignition associated with high-density development in very close proximity to the adjoining reserve land / vegetated areas; and
 - (ii) Lack of consideration of setbacks and vegetation management in accordance with FENZ guidelines.

- (iii) increased consequence and evacuation risks if a fire event occurs within the reserve.

The assessment of effects on 33 Old Racecourse Road is inadequate

Mischaracterisation of the receiving environment

9. A central concern for the Morgans is that the application materials do not accurately assess the effects of the Proposal on their property. While the substantive application includes urban design, landscape and other technical assessments, those assessments do not appear to be grounded in an accurate understanding of the character, values and experience of 33 Old Racecourse Road.
10. The Morgans are concerned that the relevant experts have not undertaken a site visit to their property and the assessments (particularly the landscape assessment) demonstrates a lack of understanding about how the Morgan's use and enjoy their property. As a result, the existing amenity values of the property — including its outlook, openness, privacy, quiet enjoyment, and relationship to the surrounding area — have not been properly understood or assessed.
11. The application makes broad statements about the Proposal being 'adjacent' to Three Parks. That is clearly wrong. This appears to have been done so that it can be claimed that the proposal is a mere extension on infill of the urban area of Wanaka, rather than a clear aberration comprising High Density development within a semi-rural context. This issue is discussed further in the evidence of Ms Stevens filed with these comments.
12. Nothing substantial has changed since the Commissioners' Decision in relation to RM181471. In that Decision the Commission noted that:

- (a) *“Even when we take into account the incremental additional built character of the planned roundabout, we find the proposal likely to be jarring in its presentation of urban development in this setting of predominantly rural characteristics¹”.*
 - (b) *“We specifically record that the arguments made in support of the environment being urban or peri-urban in character to be poorly justified. Even if we had found this to be better substantiated, there was no rationale given as to how a peri-urban character would then justify what is a considerably more intensive urban development again (some of the 31 Applicant’s team accepted that the proposal was an urban centre in response to questions from the Commission, which we struggled to correlate with the descriptions of peri-urbaness we were given).”²*
 - (c) *“The ONF that is Mt Iron is a significant contributor to the amenity and character values of this area of Wanaka. We agree with Mr Baxter and Mr Denney that the first views of Mt Iron across the Site (when approaching from the east on SH6) confer a unique and dramatic “sense of place” on arrival to Wanaka, and that the proposed development would significantly detract from this experience.”³*
13. What is currently proposed is even more intensive than the original proposal and lacks many of the key mitigation measures that were employed by the Applicant to reduce the scale and effects of the proposal and enable a substantially altered proposal to gain consent through mediation. The most significant of these are the lack of appropriate boundary setbacks, and the lack of any open space provisions to preserve the open character and perceptual qualities of Mt Iron.

¹ Decision of Commission – Mt Iron Junction Ltd (RM181471) at [151]

² Ibid at [152]

³ Ibid at [154]

Consequences of the inadequate assessment

14. These omissions matter. Without a proper appreciation of the receiving environment the application has:
 - (a) understated the sensitivity of the receiving environment;
 - (b) understated the amenity values currently enjoyed from the property;
 - (c) understated the likely degree of visual dominance, enclosure and privacy loss; and
 - (d) failed to identify appropriate interface mitigation.

15. What is proposed is a significant high-density development that is incongruent with the surrounding environment and underlying rural zone expectations. Little consideration appears to have been given to how the proposal can be integrated sensitively with the neighbouring properties or how to optimise the amenity outcomes for Mt Iron Junction residents along the boundary with properties such as the Morgan's. This is likely to create reverse sensitivity issues in the future.

Amenity effects

Existing amenity values

16. The Morgan's currently enjoy the amenity associated with a large lot residential environment, including:
 - (a) greater space around buildings;

- (b) a sense of openness;
 - (c) lower development intensity;
 - (d) privacy; and
 - (e) relative quiet.
17. This amenity would largely be retained with development of the proposal consented on the majority of the application site already. What is now proposed is fundamentally different.

Effects of the proposal

18. The Proposal introduces a substantially more intensive urban form directly adjacent to the Morgan's property. The project as described is intended to deliver high-density residential development as part of a broader mixed-use scheme.
19. In the Morgans' submission, the current layout and interface treatment will result in:
- (a) dominance from buildings located too close to the boundary;
 - (b) a loss of openness and increased sense of enclosure due to extensive built form along the boundary that is inconsistent with the Large Lot Residential Zone framework, and the Rural Zone expectations;
 - (c) increased overlooking and reduced privacy due to the extent and height of built form on the boundary;
 - (d) increased noise and general disturbance associated with the intensive pattern of development; and

- (e) a corresponding reduction in the quiet enjoyment of their property.

Lack of integration with surrounding character

Abrupt transition

- 20. The Morgans are concerned that the Proposal does not achieve an appropriate transition between the proposed high-density development and the surrounding large lot residential environment or outstanding natural feature.
- 21. Rather than providing a graduated interface, the present design creates an abrupt high density urban edge. In the Morgan's submission, this is poor planning and urban design.

Character effects

- 22. The Morgan's consider that the Proposal does not sufficiently respond to the established character of the surrounding area because it:
 - (a) places development of excessive intensity too close to adjoining residential properties and the outstanding natural feature of Mt Iron;
 - (b) does not provide adequate setbacks or separation sympathetic to the character of surrounding land;
 - (c) does not sufficiently manage building scale at the boundary;
 - (d) lacks an adequately designed landscape buffer; and
 - (e) They consider that the development adjoining their land should more closely reflect the expectations of the Large Lot Residential

character of the area, including through increased setbacks, lower building heights, lower building density and more extensive boundary planting.

Landscape buffer

23. The Morgan's are concerned that the Proposal does not provide an adequate landscaped interface along the Mt Iron Reserve boundary or their land. The proposed planting is minimal, generally limited to a single row of shrubs, and is insufficient to soften views, maintain separation, or manage amenity and fire risk. In effect, the development "borrows amenity" from adjoining land and externalises its effects.
24. This approach also leads to a significant risk of reverse sensitivity effects. Residents adjacent to the Morgan's property are likely to be intolerant of the existing vegetation on their boundary which may lead to action pursuant to the Property Law Act 2007. In light of the existing planting the minimal setbacks proposed will result in a poor amenity outcome for residents whose access to sunlight in their backyards will be impacted.

Wildfire risk

25. The application addresses wildfire risk at 6.7.6 and says:

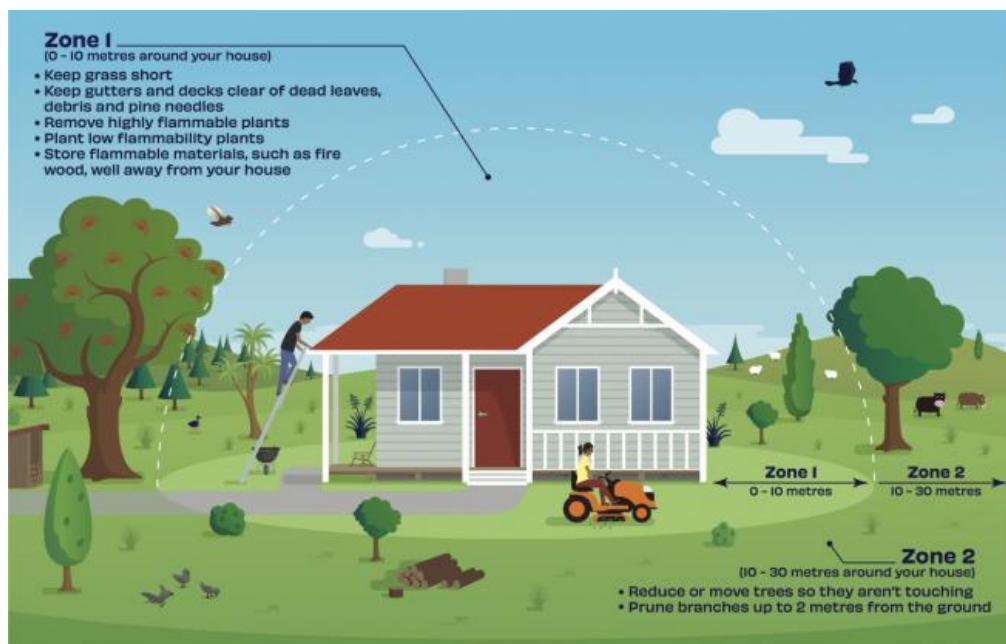
The proposal does not alter the underlying wildfire risk associated with Mount Iron and does not introduce a new hazard.

The development will incorporate standard design and servicing measures, including a setback of approximately 15m between the edge of Kanuka vegetation on Mount Iron including a proposed gravelled cycle and pedestrian path in the unvegetated area, emergency access, firefighting water supply, consistent with existing urban areas adjoining Mount Iron. With these measures in place, wildfire risk to the proposed development is assessed as acceptable and manageable.

26. The 15m setback within the reserve is completely reliant on the Council maintaining the area and preventing kānuka from regenerating. Therefore the proposal does secure any buffer zone. It is submitted that this 'buffer zone' simply cannot be relied upon when assessing the application.
27. The QLDC's Long-Term Plan acknowledges that Mt Iron has been nationally identified as a high-risk fire area.⁴ The Morgan's concerns arise in two distinct respects:
- (a) Increased likelihood of ignition: Intensification at the reserve interface increases human activity and the potential for ignition events. The absence of a secure, managed buffer exacerbates this risk. Whilst human occupation is not a new risk, the risk profile is increased by virtue of the increased occupation.
 - (b) Increased consequences: If a fire event occurs, the Proposal creates concern as to:
 - (i) the increased risk of property damage or life by increasing the number of residents in close proximity to the Reserve;
 - (ii) whether evacuation routes will be adequate under emergency conditions. This concern relates to the site itself and the wider implications for residents of surrounding areas faced with higher traffic volumes in the event of a fire event.
 - (iii) whether emergency access and egress are sufficiently robust.

⁴ Page 32.

28. Given the extreme fire risk associated with Mt Iron it is questionable whether 'standard design and servicing measures' are sufficient in this case.
29. A more considered interface in this location would also respond to wildfire risk. Fire and Emergency New Zealand (**FENZ**) guidance recommends creating defensible space between 1-10m from a house. Where flammable materials and species are removed or minimised and fuel loads are broken up, along with a suite of other recommendations as noted in the infographic below.



30. The current design makes this approach impractical. Figure 7 within the application shows the interface between the townhouses and the reserve. At this interface there are timber decks, timber fencing, hedging to fence height and residential buildings set back 1.7m from the boundary. Leaving insufficient space to establish a defensible planting regime, manage fuel loads, or achieve meaningful separation from vegetation on the Reserve which is likely to encroach over time.

31. The importance of this issue is confirmed by the December 2022 Scion Fire Technology Transfer Note, which undertook a case study of Mt Iron and the wider northern Wānaka / Albert Town area.⁵ The Site falls within the Mt Iron case study area, which is identified as a high wildfire risk rural-urban interface environment.
32. The study identifies a number of relevant risk factors⁶:
- (a) kānuka vegetation dominating the Mt Iron slopes is “highly flammable”;
 - (b) clearance of kānuka is restricted due to its classification as threatened;
 - (c) homes in the area are often constructed with wildfire-susceptible materials;
 - (d) development within this interface increases exposure to wildfire risk.
33. Of particular relevance, the study identifies residual concerns including⁷:
- (a) Narrow roads, inaccessible driveways, cul-de-sacs and no alternative access to evacuate
 - (b) National and district level planning which does not adequately consider wildfire risk

⁵ Scion Fire Technology Transfer Note “Risk perception and preparedness in a high-wildfire risk community: case study of Northern Wānaka/Albert Town, Otago” E R (Lisa) Langer, Simon Wegner and Andrea Grant (December 2022).

⁶ Page 7.

⁷ Pages 4 and 7.

- (c) Relative lack of wildfire risk mitigation guidance appropriate for urban fringe properties.
34. It further notes that there are “no immediate solutions to the poor planning and roading issues” in the Mt Iron area.⁸ Against that background, the proposal cannot be characterised as neutral in its effects on wildfire risk. While it may not change the underlying hazard, it clearly increases both:
- (a) the likelihood of ignition, through intensified residential activity at the interface; and
 - (b) the consequences of a fire event, by increasing the number of people and buildings exposed.

Transport effects exacerbating wildfire risk

35. Within the proposal’s Integrated Transport Assessment, the effects of the proposal on the roading network in terms of evacuation have not been considered. In a wildfire, there are limited evacuation routes affected residents. In the Long-Term Plan 2024-2034, the QLDC acknowledges that the transport network is geographically constrained, and the transport network is becoming increasingly constrained, adding to congestion and safety risks.⁹
36. The Proposal exacerbates suffers from many of the issues identified in the Scion Report such as use of cul-de-sacs. It is also very dense meaning a large number of people will be evacuating at the same time.
37. Considered treatment of the Reserve boundary is a potential risk management and safety measure, which does not appear to have been actively considered by the Applicant. Without sufficient separation

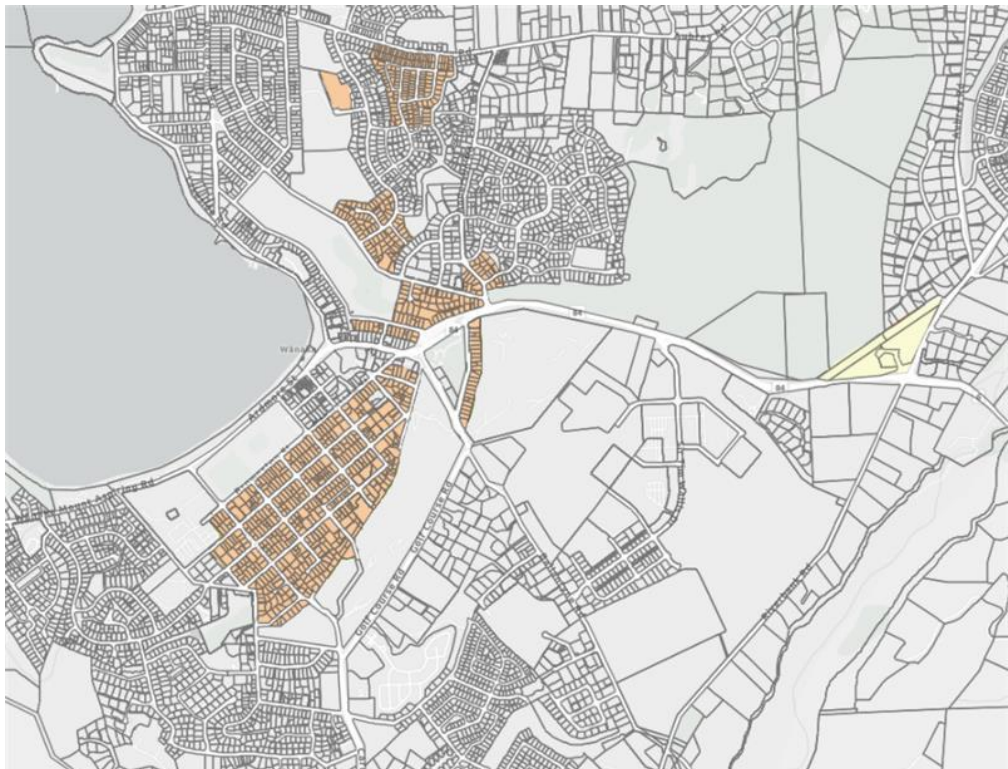
⁸ Page 7.

⁹ Page 16.

it is not possible to implement recognised defensible space measures. This leaves buildings potentially exposed to direct flame contact, radiant heat and ember attack from adjacent vegetation.

District Plan

38. The application relies on medium density residential zone (**MDRZ**) design outcomes for the parts of the Site at the Mt Iron reserve interface and along the adjoining road boundaries. The Morgan's do not consider this to be appropriate in this location.
39. The MDRZ is designed for an urban residential context, typically surrounded by other residential zoning within established urban areas. In Wānaka, the MDRZ is generally found satelliting the Wānaka Town Centre Zone, within established residential areas. The zoning is not present in Albert Town at all, nor is it applied at the interface with of an Outstanding Natural Feature or Outstanding Natural Landscape. That spatial pattern reflects the underlying intent of the zone.



Areas of Medium Density Residential Zone relative to the site

40. Against that context, reliance on MDRZ standards at the Mt Iron interface and adjacent to large lot residentially zoned land is misplaced.

Misalignment with MDRZ purpose

41. The MDRZ chapter reinforces this point. The zone's purpose is to play a key role in minimising urban sprawl, and is therefore located in established urban areas within identified urban growth boundaries.¹⁰ The Site sits outside of the Urban Growth Boundary.
42. The relevant objectives of the MDRZ are:
- (a) Objective 8.2.1: Medium density development occurs close to employment centres which encourage travel via non-vehicular modes of transport or via public transport
 - (b) Objective 8.2.3: Development provides high quality living environments for residents and provides reasonable maintenance of amenity values enjoyed on adjoining sites, while taking into account the changing future character intended within the zone.
43. These objectives are directed towards intensification within established urban environments. There is a clear disconnect between the form of development proposed and the environment in which it is located.
44. By contrast, the Plan provides specific direction for this interface through the Large Lot Residential B provisions. Objective 27.3.15 in

¹⁰ Queenstown Lakes District Plan, Part Three: Urban Environment, Chapter 8 *Medium Density Residential* at 8.1.

the Subdivision and Development Chapter is explicit in requiring a sensitive transition from urban development to the Mt Iron ONF:

Subdivision and residential development within the Large Lot Residential B Zone at Mt Iron West provides for a sensitive transition from urban to the Rural Zoned Mt Iron Outstanding Natural feature.

45. This is supported by policies:

27.3.15.1

Minimise the landscape effects of urban subdivision and development adjacent to Mt Iron through:

- a. *avoiding buildings within the Building Restriction Area as identified on the District Plan web mapping application;*
- b. *restricting the height of buildings to 6 metres and coverage of buildings within each allotment to 500m²;*
- c. *restricting residential activity to not more than four allotments; and*
- d. *retention of existing indigenous vegetation that contributes to Mt Iron's landscape values.*

27.3.15.2

Encourage opportunities to enhance indigenous biodiversity including through retention of existing indigenous vegetation or habitat of indigenous fauna that contributes to the maintenance of indigenous biodiversity.

- 46. These policies recognise that development at this interface must be transitional and responsive to the landscape values. The proposal adopts the opposite approach, effectively extending MDRZ type development directly to the reserve boundary and LLRZ with limited separation, minimal transition and no meaningful buffer.
- 47. The wider zoning pattern reinforces the incongruence of the proposed approach. Mt Iron is encircled by predominantly Large Lot Residential zoning. Within the LLRZ chapter, the Zone's purpose it seeks provide for low density housing to reflect landscape or topographical

constraints, using Mt Iron as an example.¹¹ The LLRZ is a deliberate planning response to the presence of the ONF.

Landscape effects and s 6 of the RMA

48. The Panel must take Part 2 of the Resource Management Act 1991 (**RMA**) into account.¹² Including s 6(b) which requires the protection of outstanding natural features from inappropriate subdivision, use and development. Although the proposal is not itself located within the ONF, forms part of the foreground when Mt Iron is viewed, particularly from the eastern approach to Wānaka.
49. Strategic Objective 3.2.5 in the Plan seeks the retention of the District's distinctive landscapes. The issue is the tension between allowing growth and development, while ensuring said development does not detract from the ONF.
50. The Court in *New Zealand Rail v Marlborough District Council* considered that "inappropriate" has a wider connotation than the word unnecessary and must be judged from the perspective of preserving the matters identified as being of national importance.¹³ Inappropriate implies that there are developments that are appropriate. For a development to be appropriate, then it should not adversely affect the values of the ONL.
51. In *Richard Henry Estate Ltd v Southland District Council* the Court considered when a development becomes inappropriate. In this case Judge Jackson held that a development becomes inappropriate when it "diminishes in any significant way the outstanding natural landscape or

¹¹ Queenstown Lakes District Plan, Part Three: Urban Environment, Chapter 11 *Large Lot Residential* at 11.1.

¹² Clause 17(1) of Schedule 5 of the Fast Track Approvals Act.

¹³ *New Zealand Rail v Marlborough District Council* NZRMA 70 at 85, upheld in *Pigeon Bay Aquaculture Ltd v Canterbury Regional Council* ENC Christchurch C179/03 at [41].

the reasonable person's perception of it."¹⁴ This approach applies equally to ONFs.

52. Similarly, the Court in *Rangitikei Guardians Society Inc v Manawatu-Wanganui Regional Council* recognised that adverse effects arise where development undermines or disrupts the qualities that make a feature outstanding:

*It seems to us that such adverse effects may occur when development undermines the character of a natural feature or landscape in some way thereby diminishing or disrupting the qualities which make it outstanding.*¹⁵

53. Careful scrutiny of the interface is required. A hard urban edge, with limited buffering and high built intensity, risks disrupting the openness and spatial qualities that contribute to Mt Iron's significance.
54. Ms Steven has assessed the proposal's landscape effects. She disagrees with the Landscape Assessment Report provided by the applicant and considers that the Site does not have moderate to high capacity to absorb build development.¹⁶ She emphasised the "gateway" location of the Site, and identified the locations importance in defining the place of Wānaka.¹⁷
55. The high density development would be a dramatic hard urban edge in this location, and would deter from attributes of openness and spaciousness.¹⁸

Necessity of development

¹⁴ ENC Christchurch C22/2003, 10 March 2003 at [60].

¹⁵ [2010] NZEnvC 14 at [97].

¹⁶ Brief of Evidence of Ann Steven, 19 June 2026 at [33].

¹⁷ At [33].

¹⁸ At [38].

56. The planning context in which this application has been made must be considered by the Panel. The substantive application has been made in the wake of the Urban Intensification Variation (**UIV**) undertaken by the Council.
57. The UIV was notified in August 2023, its purpose was to give effect to Policy 5 of the National Policy Statement for Urban Development. This policy requires that heights and density of urban form must be enabled to meet the accessibility or housing and business demand requirements.
58. On 5 February 2026, a meeting of Full Council Elected Members formally adopted the recommendations of the Independent Hearings Panel.
59. Whilst there are some appeals, the UIV has still released a significant amount of development capacity being within Wānaka, including small scale homes and attached dwellings similar to those proposed by this application. In this context, the necessity for this development, in this location and form, is now questionable. It is not clear that the proposal will give rise to the same level of benefits that it may have prior to the UIV.
60. The Applicant's Housing and Economic Assessment (**Assessment**) was drafted in December 2025, before the UIV Panel's decision was released. The Assessment relies heavily on the Council's Housing Demand and Capacity Assessment 2025 (**HDCA 2025**) which uses data from 2023, including the notified UIV.¹⁹ The HDCA 2025 does not take into account the significant development capacity provided by the Panel's decision on the UIV.

¹⁹ m.e Consulting *Queenstown Lakes District Housing and Business Development Capacity Assessment 2025* (Queenstown Lakes District Council, QLDC_report_SFV1, 23 September 2025) at 2.2.2.

61. A key finding from the Panel in the UIV Decision was that “it was common ground that there is sufficient plan enabled capacity (short, medium, and long term) already zoned within the District.”²⁰ The Panel therefore focussed on accessibility, which meant intensification and recommending “enablement of a substantial additional opportunity for attached housing (2 storey) in the residential zones to appropriately respond to the need for more attached housing”.²¹
62. The Assessment relied on a projected shortfall of attached dwelling capacity, which was identified in the Wānaka HCBA 2025. This information is simply out of date now, and cannot be credibly relied upon. Wānaka does not have the capacity or typology shortfall to warrant a development of this intensity in such a sensitive location, outside of the UGB.

Prior consent RM181471

63. The previous housing development application for this Site involved a substantially lower intensity of development. The Panel’s decision declining the application is relevant here as they undertook an assessment of the developments effects on the ONF.
64. The Panel found the proposal “likely to be jarring in its presentation of urban development in the setting of predominantly rural characteristics.”²²
65. The Panel’s key concern was about the visual impact of the proposal in the night-time environment, where the silhouette of Mt Iron is often darker than the night sky. Ms Steven’s assessment of Mt Iron as being the gateway and scene setting of Wānaka was also the view of this Panel:

²⁰ Urban Intensification Variation Panel Decision, 23 December 2025 at [1.12].

²¹ *Ibid* at [1.15].

²² Paragraph 151 of the Panel Decision

66. The ONF values of Mt Iron, as seen from the east, benefits from a lack of development on the site and those values are reinforced by a distinct lack of development. The current proposal will be far more intense and urbanised than what was declined in 2020, and what was subsequently authorised following mediation. Those effects have not been fully considered.

Relief sought

67. The Morgans respectfully request that the Panel declines granting consent in its current form. However, The Morgans consider that approval could be given if amendments are made that address the adverse effects discussed in these Comments such as:
- (i) Achieving a minimum 15m setback from the boundary with adjacent land; or
 - (ii) A combination of reduced building density, building height, increased setbacks and boundary treatment to create a more sympathetic interface between the application site and adjacent land; and
 - (iii) Requiring boundary planting to assist with visual screening and manage fire hazard risks; and
 - (iv) conditions managing the height and effects of external lighting on buildings facing adjacent land; and
 - (v) a prohibition on units along the boundary being used for visitor accommodation, secured by covenant for the benefit of the Morgans.

- (vi) Amendments to the planting palette so that it more effectively integrates the development with the character of the Mt Iron Reserve.

68. The Morgans request landscape controls requiring:

- (a) a deeper, continuous landscape buffer along the boundary of the site with the Mt Iron Reserve and neighbouring large lot residential properties;
- (b) covenant conditions requiring boundary landscaping to be maintained in perpetuity.

69. The Morgans request wildfire controls requiring:

- (a) a revised and more robust wildfire risk assessment specifically addressing interface conditions, defensible space, access, egress and evacuation;
- (b) a clear defensible space strategy along the reserve and edge interfaces;
- (c) reduced density and increased setbacks in the highest-risk interface areas;
- (d) independent peer review of the wildfire assessment, if necessary.

70. The Morgans request that the Panel impose any additional conditions necessary to avoid, remedy or mitigate adverse effects on their property.

Hearing / further participation

71. If the Panel decides to hold a hearing, the Morgans wish to be heard in support of these comments.

Dated: 19 June 2026

A handwritten signature in blue ink, appearing to read "Bridget Irving". The signature is written in a cursive style with a large initial 'B'.

Bridget Irving / Hannah Perkin

Counsel for CM Morgan and JC Morgan Family Trust