

## **SUBMISSION ON THE PROPOSED TIMARU DISTRICT PLAN**

*Clause 6 First Schedule, Resource Management Act 1991*

**TO:** Planning Policy Team  
Timaru District Council  
PO Box 552  
2 King George Place  
TIMARU 7910

By Email: [pdp@timdc.govt.nz](mailto:pdp@timdc.govt.nz)

### **Name of Submitters:**

1. This is a joint submission by:
  - (a) Bruce and Rosa Westgarth;
  - (b) Evan and Clare Chapman;
  - (c) Graeme Blackler;
  - (d) Graham and Sharon Peck;
  - (e) James Fraser;
  - (f) John Acland;
  - (g) Mark and Amanda Robins;
  - (h) Mark and Jenny Chamberlain;
  - (i) Richard Giles;
  - (j) Robert Peacock; and
  - (k) Tom and Gerald Hargreaves;

**(Submitters).**

2. The address for service of the Submitters is:

C/- Gresson Dorman & Co  
PO Box 244  
TIMARU 7940

Contact: Georgina Hamilton  
Email: Georgina@gressons.co.nz

**Trade Competition Statement:**

3. The Submitters could not gain an advantage in trade competition through this submission.

**Proposal this submission relates to is:**

4. This submission is on the Proposed Timaru District Plan (**Proposed Plan**), which was publicly notified on 22 September 2022.

**The specific provisions of the Proposed Plan that this submission relates to:**

5. This submission relates to the planning framework for Sites and Areas of Significance to Māori (**SASM**), including the proposed SASM listed in Schedule 6 of the Proposed Plan and the related SASM overlay in the planning maps of the Proposed Plan.
6. Specifically, this submission relates to:
  - (a) The following provisions in the SASM section of the Historical and Cultural Values Chapter of Part 2 – District Wide Matters of the Proposed Plan:
    - (i) Objectives SASM-O1 to SASM-O3 inclusive;
    - (ii) Policies SASM-P1 to SASM-P8 inclusive;
    - (iii) Rules SASM-R1 to SASM-R7 inclusive;
    - (iv) SCHED6 – Schedule of Sites of Areas of Significance to Kāti Huirapa (**SCHED6**), particularly (but not limited to):
      - (1) SASM6: Wāhi Tūpuna - Rakitata/Ōrāri/Te Umu Kaha/Mt Peel upper catchment;
      - (2) SASM7: Wāhi Taoka – Kākahu basin and foothills;

- (3) SASM9: Wāhi Tapu – Ōpihi Rock Art Sites;
- (4) SASM15: Wai Taoka and Wai Taoka Lines – Te Kākaho (Kākahu) River;
- (5) SASM16: Wai Taoka and Wai Taoka Lines – Ōpihi River and Tributaries;
- (6) SASM23: Wai Taoka and Wai Taoka Lines – Rakitata (Rangitata) River (including South branch);

and

- (v) The spatial extent of the individual SASM overlays relating to sites and areas listed in SCHED6.

### **Submission:**

#### Background

- 7. The Submitters own and operate farming businesses on the properties at the locations noted to in **Annexure A** to this submission, which are either subject to, or located in close proximity to, the SASM listed in [6(a)(iv)] above.
- 8. The Submitters therefore have an interest in the provisions of the Proposed Plan that this submission relates to that is greater than the general public.

#### The Submitters' general concerns

- 9. The Submitters understand that:
  - (a) The Timaru District Council has an obligation under section 6(f) of the Resource Management Act 1991 (**RMA**) to protect historic heritage, which includes cultural heritage, specifically sites of significance to Māori, from inappropriate subdivision, land use and development.
  - (b) The use of SASM overlays, with supporting objectives, policies and implementing rules, is an accepted and appropriate district planning approach for fulfilling that statutory obligation.

10. The Submitters therefore consider it is appropriate that the Proposed Plan includes a planning framework for the protection of SASMs identified by an overlay in the planning maps.
11. However, the Submitters have fundamental concerns about:
  - (a) The methodology that has been used to define the spatial extent of the proposed SASMs as reflected in the SASM overlay in the Proposed Plan's planning maps;
  - (b) The content of SCHED6; and
  - (c) The related planning framework governing land use activities and subdivision within the SASM overlay.
12. Those concerns are as follows:

*Methodology of SASMs identification and SCHED6*

13. It is clear from the "supporting documents" for the Proposed Plan in relation to SASMs<sup>1</sup> that the spatial extent of the proposed SASM overlay and the content of SCHED6 was developed without:
  - (a) Any engagement between Council, Te Rūnanga o Arowhenua (**Rūnanga**) or Aoraki Environmental Consultancy Limited (**AECL**) and the owners of land that is subject to the proposed SASM overlay; or
  - (b) Ground-truthing the proposed SASM (i.e., through on-site observations and/or assessment).
14. More concerning for the Submitters, however, is that unlike for other matters of national importance required by section 6 RMA to be protected in the Proposed Plan (e.g., other historic heritage, outstanding natural features and landscape and areas of significant indigenous vegetation and significant habitats of indigenous fauna), only a high-level summary report outlining the generic methodology used by Rūnanga and/or AECL to

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<sup>1</sup> Proposed Plan Background and Assessment Reports, Historic and Cultural Heritage: <https://www.timaru.govt.nz/services/planning/district-plan/proposed-district-plan/supporting-documents/supporting-information>

identify SASMs, the cultural values sought to be protected by the Proposed Plan and the activities (also in a generic sense) that may pose a threat to those values, has been made available to the public. Specifically, the Submitters have been unable to find any report that outlines for each SASM listed in SCHED6 the site-specific factors that informed the setting of the SASM overlay boundaries.

15. Without the benefit of such information, it has not been possible for the Submitters to assess whether:
  - (a) The SASM overlays reflect the spatial areas within which restrictions on activities are reasonably required to protect the cultural values of each SASM listed in SCHED6;
  - (b) The additional consenting thresholds for land use activities and subdivision introduced by proposed Rules SASM-R1 to SASM-R7 (being lower consenting thresholds than those under the Proposed Plan's district-wide and area-specific rules for earthworks, buildings and structures, mining and quarrying, indigenous vegetation clearance, subdivision, shelter belts, woodlots or plantation forestry, and intensively farmed stock) are necessary for protecting the identified cultural values of each SASM listed in SCHED6; or
  - (c) Overall, the planning framework for SASM in the Proposed Plan (as notified) meets the efficiency and effectiveness tests for district plan provisions under section 32 RMA.
16. The Submitters consider that further information about the individual SASM is required to address their concerns, and they note that refinements to the SASM overlay boundaries and SCHED6 may be required once that evidence becomes available.
17. The Submitters note that the lack of detailed information about the individual SASM listed in SCHED6 may be explained by previous advice from Rūnanga and AECL to Council that they:<sup>2</sup>

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<sup>2</sup> Letter from John Henry, former Chair of Te Rūnanga o Arowhenua and Cultural Consultant at Aoraki Environmental Consultancy Limited, to Alex Wakefield dated 30 June 2021. Proposed Plan Background and Assessment Reports, Historic and Cultural Heritage <https://www.timaru.govt.nz/services/planning/district-plan/proposed-district-plan/supporting-documents/supporting-information>

*...hold valid concerns that if detailed information as to the specific location of site is provided in a public forum that sites could be destroyed and/or vandalised. In addition, it is considered that it is not appropriate for the cultural heritage associated with the site to be questioned by those who do not have the expertise or authority to comment.*

18. With respect, the Submitters consider that their request for more detailed information is not intended to be a challenge to the validity of identified SASM but simply to ensure there is greater clarity, and therefore greater certainty for owners of land that are subject to SASMs (and for Council's consenting staff or consultants) in the future, about the site-specific values of each SASM that need be protected and the specific activities that are considered to pose a potential threat to those values.
19. The Submitters wish to also express their disappointment about the comments made by Rūnanga and AECL, which they consider completely disregard the considerable ongoing efforts of present land owners, and those of their predecessors, to preserve and protect known sites of significance to mana whenua on their properties.
20. The Submitters believe that land owners can only increase their knowledge and understanding of the values within SASMs and how they can be protected, if Rūnanga is willing to take a proactive approach by actively engaging and working collaboratively with them outside statutory planning and consenting processes. The Submitters would be receptive to such engagement and note that this is likely to be important given that the Proposed Plan rules for SASM rules do not apply to existing lawfully established farming activities on their properties that are protected by existing use rights under section 10 RMA.

#### *Planning framework for SASMs*

21. The proposed planning framework for SASM appears to have been developed without appropriate consideration or recognition of:
  - (a) The considerable costs faced by land owners in consenting routine farming activities in SASM under that framework;
  - (b) The protection afforded to existing farming land use activities under section 10 RMA;

- (c) The separate and distinct resource consenting processes under sections 13, 14 and 15 RMA under the Canterbury Regional Land and Water Plan, the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017 and Resource (National Environmental Standards for Freshwater) Regulations 2020;
- (d) The separate and distinct archaeological approval process under the Heritage New Zealand Pouhere Taonga Act 2014; and
- (e) Private land owners' legal obligations under the Health and Safety at Work Act 2015 and associated regulations.

22. The Submitters are therefore concerned that:

- (a) The rules in the SASM section of the Proposed Plan will result in duplication of consents and approvals required under other RMA planning documents or standards and Heritage New Zealand Pouhere Taonga Act 2014;
- (b) The need for additional consents for routine farming activities under those rules will add to the already spiralling regulatory and compliance costs having to be met by their farming businesses; and
- (c) The outcomes sought by proposed objective SASM-O2 and proposed policies SASM-P2 and SASM-P4, which seek to maintain and enhance access to SASMs, including those on private land, for cultural purposes may not in all cases be achievable due to land owners obligations under the Health and Safety at Work Act 2015 and associated regulations (and the serious implications of breaches with those obligations).

23. The Submitters consider that amendments are required to the Proposed Plan to address those concerns.

#### The Submitter's specific concerns

24. Without limiting the generality of the foregoing, the Submitter's specific concerns with respect to the provisions of the Proposed Plan and planning maps set out in [6(a)] together with a summary of the decisions it seeks from Council are set out in **Annexure B** to this submission.

**Decisions sought by the Submitters:**

25. The Submitters seek the following decisions from Council:
- (a) That the decisions sought in **Annexure B** to this submission be accepted; and/or
  - (b) Amendments to the provisions of the Proposed Plan to address the substance of the concerns raised in this submission; and
  - (c) All consequential amendments required to address the concerns raised in this submission and ensure a coherent planning document.

**Wish to be Heard:**

26. The Submitters wish to be heard in support of this submission.
27. The Submitters would be prepared to consider presenting a joint case with others making similar submissions at the hearing.

**Late Submission:**

28. The Submitters acknowledge that the statutory period for lodging primary submissions on the Proposed Plan closed on 15 December 2022 and that this submission is being filed after that date. The Submitters understand that the Council has a discretion as to whether it may accept the submission given that it was filed after the closing date for primary submissions.
29. The Submitters respectfully request that the submission be accepted by Council for the following reasons.
30. As outlined earlier in this submission, neither Council, Rūnanga or AECL have sought at any time to engage with the Submitters in relation to SASM on their properties or on adjacent land. As such, none of the Submitters were aware of Council's intentions to identify SASMs in the Proposed Plan and/or introduce additional consenting thresholds for land use and subdivision within SASMs that place greater restrictions on land use and subdivision than is proposed under the Proposed Plan's district-wide and area-specific rules for earthworks, buildings and structures, mining and quarrying, indigenous vegetation clearance, subdivision, forestry, and intensively farmed stock.



31. As owners of land that is either subject to a SASM overlay and/or adjacent to a SASM overlay, the Submitters are directly affected by the provisions set out in [6(a)] of this submission, and accordingly, the Submitters have an interest in those parts of the Proposed Plan that is greater than the general public.
32. The Submitters only recently became fully aware of the extent of the SASM overlay and/or the potential implications of that overlay for land use and subdivision activities on their properties through discussions with their neighbours, at which point they sought urgent legal advice.
33. This submission has been prepared with urgency and is being filed as soon as practicably possible following the receipt of that legal advice and further legal analysis and consideration of the SASM overlays and supporting planning framework.
34. Through this submission, the Submitters do not oppose the type of planning approach Council has proposed for SASMs in the Proposed Plan, or challenge the validity of the SASM listed in SCHED6 , but simply seek:
  - (a) Greater clarity about the values of each SASM and the specific activities that are considered to pose a threat to those particular values;
  - (b) To ensure:
    - (i) The SASM overlay reflects the spatial area within which restrictions on activities that pose a risk to those cultural values are reasonably required to protect those values; and
    - (ii) The supporting planning framework:
      - (1) is clear, concise and coherent;
      - (2) comprises the least restrictive planning regime that is effective in protecting the identified cultural values of SASM against activities identified as posing a threat to those values; and
      - (3) avoids unnecessary inefficiencies, including significant consenting costs.
35. The Submitters consider this submission will provide Council with scope to make positive changes to the Proposed Plan that will ensure greater certainty for owners of

land that are subject to SASM, as well as Rūnanga, AECL, Council's consents staff and compliance officers, and a planning framework for SASMs that meets the statutory tests for district plan provisions, particularly the section 32 RMA tests of efficiency and effectiveness.



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**Bruce and Rosa Westgarth, Evan and Clare Chapman, Graeme Blackler, Graham and Sharon Peck, James Fraser, John Acland, Mark and Amanda Robins, Mark and Jenny Chamberlain, Richard Giles, Robert Peacock and Tom and Gerald Hargreaves**

By their Solicitors and authorised Agents

Gresson Dorman & Co: Georgina Hamilton

Date: 27 January 2023

**ANNEXURE A: NAMES OF SUBMITTERS AND LOCATIONS OF THEIR PROPERTIES**

Bruce and Rosa Westgarth	Rock Farm, 1252 Pleasant Point-Cave Highway.
Evan and Clare Chapman	Rockburn Farming Co, 19 Limestone Road, Kakahu RD 21, Geraldine 7991.
Graeme Blackler	188 Newton Road, Hazelburn.
Graham and Sharon Peck	Peck Farms – Glen Hays, 352 Sterndale Valley Road, RD 12 Pleasant Point. Peck Farms – Clifton, 373 Henrikson Road, RD 12, Pleasant Point.
James Fraser	228 Raincliff Road, Opihi.
John Acland	Mt Peel Holdings Limited and Waikari Hills 1989 Limited, Rangitata Gorge, Peel Forest. 775 Rangitata Gorge Road.
Mark and Amanda Robins	Raincliff Road, Opihi.
Mark and Jenny Chamberlain	85 Balfour Road, Hazelburn 7982.
Richard Giles	Glenelg, 29 Moa Pass Road, RD 12 Pleasant Point.
Robert Peacock	Orari Gorge Station, 991-1023 Tripp Settlement Road.
Tom and Gerald Hargreaves	Kakahu Farm, 1422 Winchester Hanging Rock Road, Kakahu.

## ANNEXURE B – REASONS FOR SUBMISSION AND DECISIONS SOUGHT BY THE SUBMITTERS

Specific provision of the Proposed Timaru District Plan (PDP) to which submission relates		Submission		Decision Sought
Part	Section/ Provision	Support/Oppose/New	Reasons	
Part 2 – District-Wide Matters	Objective SASM-O2 and Policies SASM-P3 and SASM-P4	Oppose in part	The Submitters are concerned that, as notified, these plan provisions do not recognise that access to and within SASM on private land may not in all cases be possible or appropriate due to statutory obligations imposed on land owners under the Health and Safety in Work Act 2015 and/or regulations promulgated under that statute. The Submitters consider that these plan provisions require amendments to reflect that reality and to achieve the purpose of the RMA.	Amend Objective SASM-O2 and Policies SASM-P3 and SASM-P4 to recognise that access to and within SASMs on private land may not always be possible and/or appropriate for health and safety reasons.
Part 2 – District-Wide Matters	Policy SASM-P2 and SASM-P8	Oppose in part	<p>The Submitters are concerned that this policy appears to envisage engagement/consultation with Kāti Huirapa as the primary mechanism for determining the cultural values within a SASM, and how any proposed activity with the SASM might affect such values.</p> <p>The Submitters are somewhat confused by that approach as the cultural values of each SASM are recorded in the tables in SCHED6 in the column “Site Type and Values”. They also question whether it would be consistent with Objective SASM-O1 (which requires Kāti Huirapa to be actively involved in decision-making that affects the values of identified SASM only) and/or meet the efficiency test under section 32 RMA.</p> <p>The Submitters are also concerned about the burden of such wider engagement/consultation for Rūnanga and/or AECL, and how it would be resourced.</p> <p>As noted below in the Submitters’ submission on SCHED6, the Submitters consider that the inclusion of more information in SCHED6 would be beneficial for plan users</p>	Amend Policy SASM-P2 and SASM-P8(1) to direct engagement/consultation with Kāti Huirapa in relation to activities identified in SCHED6 as posing a threat to the cultural values of the SASM within which the proposed activity will occur that are also identified in SCHED6.

Specific provision of the Proposed Timaru District Plan (PDP) to which submission relates		Submission		Decision Sought
Part	Section/ Provision	Support/Oppose/New	Reasons	
			<p>and those processing consents under the plan, specifically a fuller description of each SASM and details of the activities that Kāti Huirapa have identified as posing a risk to the identified cultural values.</p> <p>The Submitters consider that a clearer and more efficient planning approach would be for engagement/consultation to be focused primarily on activities identified in SCHED6 that pose a threat to the values of the SASM also identified in SCHED6. The Submitters note that such an approach would be consistent with the directive in Objective SASM-O1 and that adopted and accepted as achieving the directives of section 6 RMA in district plans elsewhere.</p>	
Part 2 – District-Wide Matters	Rules SASM-R1 to SASM-R8	Oppose in part	<p>In the absence of information that has informed the location of the overlay boundaries of each SASM listed in SCHED6 and the activities that Kāti Huirapa consider to pose a threat to those values, it has not been possible for the Submitters to assess whether the additional (and very low) consenting thresholds for earthworks, buildings and structures, indigenous vegetation clearance, temporary events, mining and quarrying, shelterbelts, woodlots and forestry subdivision and intensively farmed stock under Rules SASM-R1 to SASM-R8 (i.e., being additional to the consenting thresholds for such activities in other District-Wide or Area-Specific rules in the Proposed Plan) are appropriate and/or necessary in terms of fulfilling the obligations under section 6(f) and other relevant provisions in Part 2 of the RMA.</p> <p>Having reviewed the planning framework for SASM adopted in other district plans, the Submitters consider the other District-Wide and Area-Specific rules in the Proposed Plan for earthworks, buildings and structures, indigenous vegetation clearance, temporary events, mining and quarrying, shelterbelts, woodlots and forestry,</p>	<p>Delete Rules SASM-R1 to SASM-R8 and replace with:</p> <ul style="list-style-type: none"> <li>• A list of matters of discretion to be applied where restricted discretionary resource consent is triggered under other District-Wide or Area-Specific rules in the Proposed Plan for earthworks, buildings and structures, indigenous vegetation clearance, temporary events, mining and quarrying, shelterbelts, woodlots and forestry, subdivision and intensively farmed stock, and the proposed activity will occur within SASM, with such matters being focused on the effects of the activity on the values of the SASM identified in SCHED6.</li> <li>• A list of matters for assessing applications for resource consents that are triggered under other District-Wide or Area-Specific rules in the Proposed Plan for earthworks, buildings and structures, indigenous vegetation clearance, temporary events, mining and quarrying, shelterbelts, woodlots and forestry, subdivision and intensively farmed stock, where the proposed activity will occur within a SASM, with such matters being focused on the effects of</li> </ul>

Specific provision of the Proposed Timaru District Plan (PDP) to which submission relates		Submission		Decision Sought
Part	Section/ Provision	Support/Oppose/New	Reasons	
			<p>subdivision and intensively farmed stock may provide effective protection of the cultural values in SASMs from activities that pose a threat to such values, alongside SASM-specific matters of discretion (for restricted discretionary activities) and assessment matters (for consideration of resource consent applications for restricted discretionary, discretionary and non-complying activities). This option does not appear to have been considered as part of Council's section 32 assessment, but may be a more efficient planning option.</p> <p>In this regard, the Submitters note that such an approach would be consistent with the caselaw principle that where the purpose of the RMA and the objectives of a proposed plan can be met by a less restrictive regime, then that regime should be adopted.</p>	the activity on the values of the SASM identified in SCHED6.
Part 4 – Appendices and Schedules	SCHED6- Schedule of site and areas of significance to Kāti Huirapa	Oppose in part	<p>The Submitters consider that it is essential for SCHED6 to include:</p> <ul style="list-style-type: none"> <li>• A clear description of the site or area of each SASM; and</li> <li>• A clear statement of the activities that pose a threat to the identified cultural values.</li> </ul> <p>There is inconsistency in the information and detail recorded in SCHED6 in relation to the specific sites/areas and the cultural heritage values that are to be protected within the listed SASM. No information regarding the particular activities that pose a threat to those values, which are the focus of the objectives, policies and rules for SASM, has been included or appears to be available elsewhere (e.g., in the cultural heritage reports supporting the Proposed Plan and referred to in Council's section 32 report).</p>	<p>(1) Amend SCHED6 to include the following for each of the listed SASMs:</p> <ul style="list-style-type: none"> <li>• A clear description of the site or area of each SASM; and</li> <li>• A clear statement of the activities that pose a threat to the cultural values identified in SCHED6.</li> </ul> <p>(2) Amend the heading of SCHED6 to reflect the additional information on SASM that the Submitters have requested be included in SCHED6 per (1) above.</p>

Specific provision of the Proposed Timaru District Plan (PDP) to which submission relates		Submission		Decision Sought
Part	Section/ Provision	Support/Oppose/New	Reasons	
			The Submitters consider that such information is essential to ensure the SASM planning framework is effective in terms of protecting cultural heritage, meets the statutory test for efficiency, is necessary to achieve Objective SASM-O3 and would more closely align with the approach taken in second generation district plans elsewhere (e.g., Appendix A4 of the Dunedin City Council's "2 <sup>nd</sup> Generation Plan").	
Planning Maps	SASM Overlay	Oppose in part	<p>The Submitters are concerned that there appears to be no information explaining the basis on which the boundary of the overlay for each SASM listed in SCHED6 has been arrived at. In the absence of that information, and details about the particular activities that pose a threat to the cultural values of each SASM identified in SCHED6, it has not been possible for the Submitters to assess whether the SASM overlays reflect the spatial areas within which restrictions on activities are reasonably required to protect the cultural values of each SASM.</p> <p>In this regard, the Submitters note the caselaw principle that where the purpose of the RMA and the objectives of a proposed plan can be met by a less restrictive regime, then that regime should be adopted.</p> <p>The Submitters therefore consider it is essential that such information is provided, and that, where necessary and/or appropriate, the spatial extent of the SASM Overlays in the Proposed Plan's planning maps be refined (i.e., reduced) to reflect the land area reasonably required to protect the cultural heritage values identified in SCHED6 from the activities also identified that pose a threat to those values (as requested in the Submitter's submission on SCHED6 above).</p>	<p>(1) Further information be made available to owners of land that is subject to a SASM listed in SCHED6 regarding:</p> <ul style="list-style-type: none"> <li>• The factors that informed the setting of the SASM overlay; and</li> <li>• The activities that Kāti Huirapa have identified as posing a threat to the cultural values of the SASM as identified in SCHED6.</li> </ul> <p>(2) In light of that further information, amend the boundaries of the SASM overlays to reflect the spatial extent reasonably required to protect the identified cultural values for each SASM in SCHE6 from the activities that pose a threat to those values.</p>

## Jane Marine

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**From:** Georgina Hamilton <georgina@gressons.co.nz>  
**Sent:** Friday, 27 January 2023 1:41 pm  
**To:** PDP  
**Cc:** Lucy Clough  
**Subject:** Submission on Proposed Timaru District Plan  
**Attachments:** Submission on Proposed Timaru District Plan.pdf

Good afternoon

Please find **attached** for filing a joint submission on the Proposed Timaru District Plan by Bruce and Rosa Westgarth, Evan and Clare Chapman, Graeme Blackler, Graham and Sharon Peck, James Fraser, John Acland, Mark and Amanda Robins, Mark and Jenny Chamberlain, Richard Giles, Robert Peacock and Tom and Gerald Hargreaves.

The submitters acknowledge that their submission is being lodged after the statutory submission period has closed. This is addressed in the submission, together with a request that the late submission be accepted by Council and the reasons supporting that request.

Kind regards,

Georgina Hamilton  
Partner



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