

# Submission on Notified Proposal for Plan, Change or Variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of submitter:

Bruce William Speirs

[State full name]

This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the 'proposal'):

Proposed Timaru District Plan

[State the name of proposed or existing plan and (where applicable) change or variation].

I could/could not\* gain an advantage in trade competition through this submission.

[\*Select one.]

~~\*I am/am not directly affected by an effect of the subject matter of the submission that—~~

~~(a) adversely affects the environment; and~~

~~(b) does not relate to trade competition or the effects of trade competition.~~

[\*Delete or strike through entire paragraph if you could not gain an advantage in trade competition through this submission.]

[\*Select one.]

The specific provisions of the proposal that my submission relates to are: [Give details]

As per attached

**My submission is:** [Include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]

[If your submission relates to a proposed plan prepared or changed using the collaborative planning process, you must indicate the following:

- Where you consider that the proposed plan or change fails to give effect to a consensus position and therefore how it should be modified; or
- In the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan should be modified.]

As per attached

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**I seek the following decision from the local authority:** *[Give precise details as this is the only part of your submission that will be summarised in the summary of decisions requested]*

As per attached  
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**I wish (or do not wish) † to be heard in support of my submission.**

*[\*In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.]*

*[†Select one.]*

**\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

*[\*Delete if you would not consider presenting a joint case.]*

Biospurs  
.....

**Signature of submitter (or person authorised to sign on behalf of submitter)**

*[A signature is not required if you make your submission by electronic means]*

Date 12-12-22

Electronic address for service of submitter: lsg@aextra.co.nz

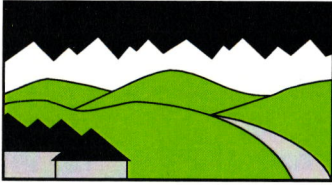
Telephone: 684 6645

Postal address (or alternative method of service under s352 of the Act):  
Post Box 611 Timaru 7940

Contact person: *[name and designation, if applicable]*  
Bruce Speirs

**Note to person making submission**

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
2. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
  - It is frivolous or vexatious:
  - It discloses no reasonable or relevant case:
  - It would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
  - It contains offensive language:
  - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matter.



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12 December 2022

Timaru District Council  
Post Box 522  
Timaru  
7940



## **SUBMISSION ON PROPOSED DISTRICT PLAN**

### **NATURAL HAZARDS p 8 of 10**

Move NH-R8 and associated objectives and policies to the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

### **HISTORIC HERITAGE p 5 of 7**

Move HH-R9 and associated objectives and policies to the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

### **HISTORIC HERITAGE p 7 of 7**

Move HH-R16 and associated objectives and policies to the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

### **SITES AND AREAS OF SIGNIFICANCE TO MAORI p 11 of 11**

Delete SASM-R7.

If desired, it may be possible to develop and show appropriate objectives, policies, rules, standards, activity status, matters of control and discretion, for subdivision of land shown in the Wahi taoka, wahi tapu, wai taoka and wai tapu overlay areas, in the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

### **ECOSYSTEMS AND INDIGENOUS BIODIVERSITY p 5 of 6**

Delete ECO-R6.

If necessary, develop appropriate objectives, policies, rules, standards, activity status, matters of control and discretion, for subdivision of land containing a significant natural area, in the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

## **NATURAL CHARACTER p 6 of 6**

Delete NATC-R8.

If necessary, develop appropriate objectives, policies, rules, standards, activity status, matters of control and discretion, for subdivision of land containing a riparian margin, in the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

## **NATURAL FEATURES AND LANDSCAPES p 7 of 9**

Delete NFL-R9.

If necessary, develop appropriate objectives, policies, rules, standards, activity status, matters of control and discretion, for subdivision in a ONF overlay area, in the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

## **PUBLIC ACCESS p 2 of 3**

Modify PA-R1 to remove reference to subdivision.

If necessary, develop appropriate objectives, policies, rules, standards, activity status, matters of control and discretion, for subdivision in a public access overlay area, in the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

## **COASTAL ENVIRONMENT p 9 of 11**

Delete CE-R11.

If necessary, develop appropriate objectives, policies, rules, standards, activity status, matters of control and discretion, for subdivision in the coastal environment area, sea water inundation, coastal high natural character area and coastal erosion overlay areas, in the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

## **DRINKING WATER PROTECTION p 2 of 3**

Move DWP-R2 and associated objectives and policies to the subdivision section of the plan.

When we consider that subdivision is given considerable prominence and significance in resource management, it makes sense to have all rules involving subdivision in one place in the plan.

## **SUBDIVISION p 2 of 11**

Please identify appropriate Objectives for the Rural Lifestyle zone, and amend SUB-P15 as appropriate.

At present there are Objectives for Rural and Residential subdivision, but none for Rural Lifestyle subdivision.

## **SUBDIVISION p 5 of 11**

In SUB-R1 change Activity status from Non-Complying to Discretionary when compliance with CON-1 is not achieved.

To move from Controlled to Non-Complying is too extreme where a single standard is not complied with.

## **SUBDIVISION p 7 of 11**

In SUB-R3 change Activity status from Non-Complying to Discretionary when compliance with RDIS-2 is not achieved.

To move from Restricted Discretionary to Non-Complying is too extreme where a single standard is not complied with.

## **SUBDIVISION p 2 of 11**

Move SUB-O5 to a new section of the Proposed Plan relating to esplanades.

It is possible to create esplanades outside of the subdivision process, and it is appropriate a separate section of the Proposed Plan be developed.

## **SUBDIVISION p 3 of 11**

Move SUB-P7 to a new section of the Proposed Plan relating to esplanades.

It is possible to create esplanades outside of the subdivision process, and it is appropriate a separate section of the Proposed Plan be developed.

## **ESPLANADES – new section**

Develop a new section of the plan specifically for esplanades.

While definitions of an **Esplanade reserve** and an **Esplanade strip** are included in the Proposed Plan, the lack of context could be misleading to the general public, and further explanation needs to be outlined.

For example, context for a river is provided by s230 (4) of the RMA, which reads; 'a **river** means a river whose bed has an average width of 3 metres where the river flows through or adjoins an allotment', while **River** and **Bed** are both included in the definitions section of the Proposed Plan to complete the situations where esplanades may be appropriate.

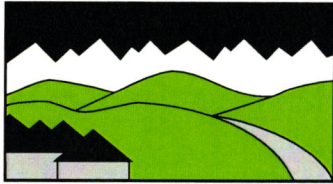
That is: a river is a continually or intermittently flowing body of fresh water, and includes a stream and modified watercourse, whose bed has an average width of 3 metres or more where the body of fresh water flows through or adjoins an allotment, the bed being that land which the body of fresh water covers at its annual fullest flow without overtopping its banks.

I wish to be heard in relation to this submission.

Yours faithfully



**B W Speirs**  
Cadastral Surveyor



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24 November 2022

Timaru District Council  
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## **SUBMISSION ON PROPOSED DISTRICT PLAN**

### **CONTENTS p 1 of 3**

Add PART 2 - PLANNING MAPS, and renumber later parts.

p4 of 6 of the GENERAL APPROACH indicates the first step in identifying activity status is to consult the PLANNING MAPS. It would be appropriate if the CONTENTS acknowledged the maps and was consistent with this approach.

### **CONTENTS p 2 of 3**

Add reference to FINANCIAL CONTRIBUTIONS and FUTURE DEVELOPMENT AREAS in their correct order to the GENERAL DISTRICT WIDE MATTERS

These items are currently missing from the contents.

### **CONTENTS p 2 of 3**

Add a DEVELOPMENT AREAS heading after SPECIAL PURPOSES ZONES, and further reference the Broughs Gully, Gleniti, Washdyke and Temuka development areas.

To be consistent with the content of the proposed plan.

### **PLANNING MAPS**

Delete the Rural Lifestyle Zone from areas where highly productive soils are present.

The Rural Lifestyle Zone is inconsistent with Policy 6 of the National Policy Statement for Highly Productive Soils.

### **DEFINITIONS p 14 of 26**

Amend the NATIONAL GRID SUBDIVISION CORRIDOR definition to read: 'AAS set out in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) and the Electricity (Hazards from Trees) Regulations 2003.'

It is noted that Policy 10 of the National Policy Statement deals with managing the adverse effects of third parties on the transmission network. In this, Territorial Authorities should 'seek to prevent development and activities that may endanger people or property by being too close to transmission lines.'

Such advice on the endangerment of people or property is included in the code of practice and regulations, while if we look to the example Policy responses of the National Policy Statement, none of these run counter to this approach.

The introduction of the widths set out in the current definition appear to be an attempt to advantage Transpower NZ Ltd to acquire private property rights from some of the district's land owners and ratepayers, without a corresponding requirement to pay compensation for those private property rights, as required by the Public Works Act.

An example of this situation is close to hand, where the 220 kV feed into Timaru currently sits within a 60 m wide easement (for which proper compensation was paid), yet the proposed definition gives Transpower NZ Ltd rights that extend further than this easement.

#### **DEFINITIONS p 14 of 26**

Amend the NATIONAL GRID YARD definition to read: 'As set out in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) and the Electricity (Hazards from Trees) Regulations 2003.'

It is noted that Policy 10 of the National Policy Statement deals with managing the adverse effects of third parties on the transmission network. In this, Territorial Authorities should 'seek to prevent development and activities that may endanger people or property by being too close to transmission lines.'

Such advice on the endangerment of people or property is included in the code of practice and regulations, while if we look to the example Policy responses of the National Policy Statement, none of these run counter to this approach.

The introduction of the widths set out in the current definition appear to be an attempt to advantage Transpower NZ Ltd to acquire private property rights from some of the district's land owners and ratepayers, without a corresponding requirement to pay compensation for those private property rights, as required by the Public Works Act.

#### **DEFINITIONS p 17 of 26**

In PERSONAL SERVICES, delete all the words after the word 'people'.

The listed services are not a complete list of services offered to people, but gives the impression that other services not listed are excluded.

#### **DEFINITIONS p 20 of 26**

In RIPARIAN MARGIN, amend the word 'figure' to 'figures' and add a diagram of a river without a flood plain.

In many cases a river is deeply incised in the landscape and there may be no distinct bank and no flood plain present.

#### **DEFINITIONS p 22 of 26**

In SENSITIVE ACTIVITY, delete all the words after item 7.

These words appear to relate to something other than the listed activities.

#### **DEFINITIONS p 22 of 26**

In SENSITIVE ENVIRONMENT, 2, a, reference to the edge of a Riparian Margin needs to specify whether this is the water edge (bank) or the landward edge (up to 100 m from the bank).

A riparian margin has two edges, and the definition does not specify which one the distance is measured from.

#### **DEFINITIONS p 25 of 26**

In UNACCEPTABLE RISK, change '1 x 10<sup>-6</sup>' to read: '1 x 10<sup>-6</sup>', or '1:1,000,000', or just leave it as 'one in a million'.

Using correct terminology is important.

#### **DEFINITIONS p 25 of 26**

Remove the definition UNDERMINE.

Without context, this term is open to too much opinion, and therefore is not a definition.

## **DEFINITIONS p 25 of 26**

Amend the definition of VEHICLE PARKING AREA to: 'VEHICLE PARKING AND MANOEUVRING AREA - means that part of a site within which vehicle parking and manoeuvring are accommodated'.

Clarity.

## **DEFINITIONS p 25 of 26**

Remove the VERSATILE SOIL definition.

The National Policy Statement on Highly Productive Soils has overtaken this item.

## **DEFINITIONS**

Add a HIGHLY PRODUCTIVE SOIL definition.

To be consistent with the National Policy Statement.

## **ABBREVIATIONS p 1 of 2**

Either remove DRPA, or give it its correct full term.

## **ABBREVIATIONS p 1 of 2**

For MHWS, correct the full term to 'Mean High Water Springs'.

## **NATIONAL POLICY STATEMENTS**

Add reference to the National Policy Statement for Highly Productive Soils, and review the proposed plan in terms of that document.

Considerable portions of the proposed plan are not currently consistent with the National Policy statement for Highly Productive Soils.

## **URBAN FORM AND DEVELOPMENT**

In UFD-01, vii, replace the word 'versatile' with the words 'highly productive'.

To be in terms of the National Policy Statement.

## **ENERGY AND INFRASTRUCTURE p 3 of 20**

Delete the word 'a' from the Rules Note.

Grammar.

## **ENERGY AND INFRASTRUCTURE p 14 of 20**

In EI-R32, 1, PER-1, replace the word 'solely' with the word 'principally'.

As currently written, you would need a restricted discretionary consent to feed excess power into the electricity grid.

## **ENERGY AND INFRASTRUCTURE p 14 of 20**

In EI-R32, 2, PER-1, replace the word 'solely' with the word 'principally'.

As currently written, you would need a restricted discretionary consent to feed excess power into the electricity grid.

## **ENERGY AND INFRASTRUCTURE p 15 of 20**

In EI-R33, PER-2, amend reference PER-1.a. to PER-1 2.a.

Correction.

## **ENERGY AND INFRASTRUCTURE p 15 of 20**

In EI-R33, PER-3, amend reference PER-1.b. to PER-1 2.b.

Correction.

## **ENERGY AND INFRASTRUCTURE p 19 of 20**

In EI-R39 amend the word 'with' to 'within'.

Grammar.



## **ENERGY AND INFRASTRUCTURE p 19 of 20**

In EI-R39, PER-2, amend '10' to '10 m'.

Completeness.

## **TRANSPORT p 1 - 19**

From the Objectives onwards, the font size needs to be made consistent with the balance of the document.

The reduced font size of the majority of this section of the plan is hard to read.

## **TRANSPORT p 5 of 19**

In TRAN-S2, 1, amend 'Figure 5' to 'Figure 6'.

Correction.

## **NATURAL CHARACTER p 5 of 6**

Include a post and netting fence as a permitted activity.

A post and netting fence will be more appropriate in many situations.

## **VERSATILE SOIL p 1 and p 2**

This section of the plan needs to be totally rewritten for highly productive soils.

To be in terms of the National Policy Statement for Highly Productive Soils.

## **SUBDIVISION p 2 of 11**

In SUB-O3, 1, add the word 'highly' after the word 'of'.

To be consistent with the National Policy Statement for highly productive soils.

## **SUBDIVISION p 2 of 11**

In SUB-P4, remove item 2.

Safety requires people who are in control of mobile transport to concentrate on their immediate surroundings, not looking at views and landmarks.

## **SUBDIVISION p 8 of 11**

Amend SUB-S1, 3, into two parts, for 1. highly productive soils, and 2. other soils, and develop appropriate area requirements.

The National Policy Statement for Highly Productive Soils does not support a minimum site area for highly productive soils on subdivision, and in many cases, specific land use of these soils does not require a 40 ha site area. This indicates the rule is not consistent with the National Policy Statement, and a rule which is consistent with the National Policy Statement needs to be developed.

With the National Policy Statement for Highly Productive Soils dealing with highly productive soils, by implication, there is lesser concern with regard to land that does not have highly productive soils. In this case, there can be no valid reason for a 40 ha minimum site area.

Also, with the National Policy Statement for Highly Productive Soils also indicating that Rural Lifestyle Zones should only be established on less productive soils, such land use does not require 40 ha minimum site areas, and to allow such activity to proceed without unduly impacting lands that are not classed as highly productive, more appropriate site areas need to be developed.

## **SUBDIVISION p 8 of 11**

Amend SUB-S1, 4, 1 - 4 to read: '5,000 m<sup>2</sup> in areas where there is a community sewer connection to an allotment intended for residential use, otherwise 2 ha.'

With the Rural Lifestyle Zone inconsistent with Policy 6 of the National Policy Statement for Highly Productive Soils, it is probable such zones will be located away from the residential zones of the district, which are currently surrounded by highly productive soils.

In such situations, 2 ha should allow for Environment Canterbury compliant effluent disposal systems to be installed, while avoiding un-necessary expansion of residential activity onto general agricultural land.

### **DRINKING WATER PROTECTION p 2 of 3**

In DWP-R2, RDIS-1, add the word 'not' after the word 'is'.

Consistency.

### **FUTURE DEVELOPMENT AREA p 5 of 5**

Delete FDA-R10.

The Subdivision portion of the proposed plan is the appropriate place to set area requirements, which generally allows for a Restricted Discretionary Activity status. It is noted that many sites within the current Future Development Areas have allotment areas considerably smaller than 40 ha, and any subdivision of these would result in a Non-complying Activity status.

### **GENERAL RESIDENTIAL ZONE p 4 of 9**

Delete PER-1.

The rule as currently written does not take account of personal privacy or safety issues of land owners.

### **GENERAL RESIDENTIAL ZONE p 7 of 9**

Replace the word 'must' with the word 'shall'.

Grammar.

### **GENERAL RESIDENTIAL ZONE p 7 of 9**

Delete PER-1.

The rule as currently written does not take account of personal privacy or safety issues of land owners.

### **GENERAL RESIDENTIAL ZONE p 7 of 9**

In GRZ-S9, the words 'available to be' need to be added after the word 'be'.

I am sure it is not Councils intention to specify what type of landscaping is appropriate on private property, only that sufficient area be available for landscaping purposes.

### **MEDIUM DENSITY RESIDENTIAL ZONE p 5 of 9**

Delete PER-1.

The rule as currently written does not take account of personal privacy or safety issues of land owners.

### **MEDIUM DENSITY RESIDENTIAL ZONE p 8 of 9**

In MRZ-S6, the words 'available to be' need to be added after the word 'be'.

I am sure it is not Councils intention to specify what type of landscaping is appropriate on private property, only that sufficient area be available for landscaping purposes.

### **GENERAL RURAL ZONE p 1 of 15**

Delete GRUZ-O2, 1.

Allotments in this zone vary in size, and it would be inappropriate to apply the term large to many of these.

### **GENERAL RURAL ZONE p 2 of 15**

In GRUZ-P2, 1, delete the words 'a large minimum'.

Many smaller allotments in this zone have ample open space around buildings, and it is therefore both inaccurate and redundant to include these words.

### **GENERAL RURAL ZONE p 3 of 15**

In GRUZ-R1, PER-3, delete the words 'located in the Maori Purpose Zone'.

There appears to be no valid reason to restrict the application of this rule to land adjoining the Maori Purpose Zone.

**GENERAL RURAL ZONE p 4 of 15**

In GRUZ-R3, PER-1, add the words 'they or there eggs' after the first occurrence of the word 'and'.

It is presumably the intent that eggs are also for self-subsistence purposes.

**GENERAL RURAL ZONE p 4 of 15**

In GRUZ-R3, PER-4, delete the word 'and'.

This word is redundant.

**GENERAL RURAL ZONE p 4 of 15**

Amend GRUZ-43, PER-1, to read: 'This is for the construction of the sole residential unit on a site.'

This better reflects the intent of the rule.

**GENERAL RURAL ZONE p 10 of 15**

Amend GRUZ-R19, PER-1, to read: 'The accommodation is to be on a site of at least 20 ha area and no existing household unit is present.'

This better reflects the intent of the rule.

**RURAL LIFESTYLE ZONE p 3 of 10**

Delete RLZ-R2, PER-2

As it is within council's power to preclude allotments of less than 5,000 m<sup>2</sup> after the date specified, the rule is redundant. It also appears to be a factually incorrect statement of the intent of the rule.

**RURAL LIFESTYLE ZONE p 4 of 10**

In RLZ-R5, PER-1, add the words 'they or there eggs' after the first occurrence of the word 'and'.

It is presumably the intent that eggs are also for self-subsistence purposes.

**RURAL LIFESTYLE ZONE p 9 of 10**

In RLZ-S5, 2, include a post and netting fence.

A post and netting fence will be more appropriate in many situations.

I wish to be heard in relation to this submission.

Yours faithfully



B W Speirs  
Cadastral Surveyor

**From:** [Bruce Speirs](#)  
**To:** [Megan Geng](#)  
**Subject:** Re: Submission on Proposed Timaru District Plan - Clarification on related provisions  
**Date:** Monday, 9 January 2023 10:52:46 am  
**Attachments:** [image282660.png](#)

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Megan

Sorry about that;

Delete GRZ-R10 PER-1.

Change word in GRZ-S6.

GRZ p 7 of 9 PER-1 is an error on my part and can be ignored.

Delete MRZ-R10 PER-1.

GRUZ-R43 is a typo and should read GRUZ-R4.

Bruce

Bruce Speirs  
Cadastral Surveyor  
Land Service Group Ltd  
Ph 03 684 6645

On 4/01/2023 1:09 pm, Megan Geng wrote:

Hi Bruce,

Happy new year and hope you've had a good break.

Could you please clarify which provisions the below submission points relate to:

**GENERAL RESIDENTIAL ZONE p 4 of 9**

*Delete PER-1.*

*The rule as currently written does not take account of personal privacy or safety issues of land owners.*

**GENERAL RESIDENTIAL ZONE p 7 of 9**

*Replace the word 'must' with the word 'shall'.*

*Grammar.*

**GENERAL RESIDENTIAL ZONE p 7 of 9**

*Delete PER-1.*

*The rule as currently written does not take account of personal privacy or safety issues of land owners.*

**MEDIUM DENSITY RESIDENTIAL ZONE p 5 of 9**

*Delete PER-1.*

*The rule as currently written does not take account of personal privacy*

*or safety issues of land owners.*

**GENERAL RURAL ZONE p 4 of 15**

*Amend GRUZ-43, PER-1, to read: 'This is for the construction of the sole residential unit on a site.'*

*This better reflects the intent of the rule.*

Many thanks



**Megan Geng** | Team Leader Policy

Timaru District Council | PO Box 522 | Timaru 7940

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**From:** [Bruce Speirs](#)  
**To:** [Megan Geng](#)  
**Subject:** TDC Proposed Plan  
**Date:** Wednesday, 14 December 2022 9:09:37 am

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Megan

I have just picked up that the Financial Contribution section of the plan has a subdivision rule. If you would add the following to our submission please.

FC-R3 needs to be moved to the Subdivision section of the plan and retitled Financial contributions.

Bruce

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Bruce Speirs  
Cadastral Surveyor  
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