

CENTRAL OTAGO DISTRICT COUNCIL
S95A-F DECISION FOR RC230217
176 Queensberry Terrace, Luggate

INTRODUCTION

Resource Consent is sought for a two-lot subdivision and the establishment of a residential building platform on the new Lot 2 in the Rural Resource Area.

BACKGROUND

A summary of the resource consent and building consents that have been granted for the site are listed below:

- Subdivision Consent and Land Use Consent RC 030141 created the subject site. RC 030141 approved by the committee authorised a 20-lot subdivision in the Rural Resource Area. Section 224(c) certification was issued on 26 July 2004. Consent Notice (CONO. 6099456.4) was registered on the title in relation to Lots 1-6 and 8-10 not obtaining direct access onto State Highway, and reserve sensitivity effects of rural pastoral farming.
- RC 100309 and Building Consent (BC) 100778 authorised a new dwelling and a separate garage to be constructed on the site in 2010. Code of Compliance was issued on 5 July 2012.
- BC 140750 authorised a new 4 bay implement site to be constructed on the site in 2014. Code of Compliance was issued on 9 February 2015.

SITE DESCRIPTION

The subject site is located at 176 Queensberry Terrace, Luggate, approximately 4.6 km southeast of Luggate. To the west of the site the land slopes up towards the Pisa Range, and to the east of the site the land slopes down towards the Luggate-Cromwell Road (State Highway 6) and Clutha River, which is located approximately 340 m to the east. The site is legally described as Lot 10 DP 328097 and held in Record of Title 114451.

The site has approximately 8.0580 hectares (ha), which consists of an existing dwelling and a couple of sheds located on a flat area located near the top of the site. The surrounding land is fenced and cultivated by the applicant. From the dwelling and sheds towards the east, the land comprises of rocky outcrops, and scattered native scrubs (i.e., prominently kanuka, and grassland).

The surrounding land is characterised as rural lifestyle blocks located on rolling to steeply sloping land that is intersperse with rocky outcrops and scattered native scrubs. There are residential dwellings, and ancillary buildings scattered throughout the area.

The subject site, and surrounding land is shown in Figure 1 below.

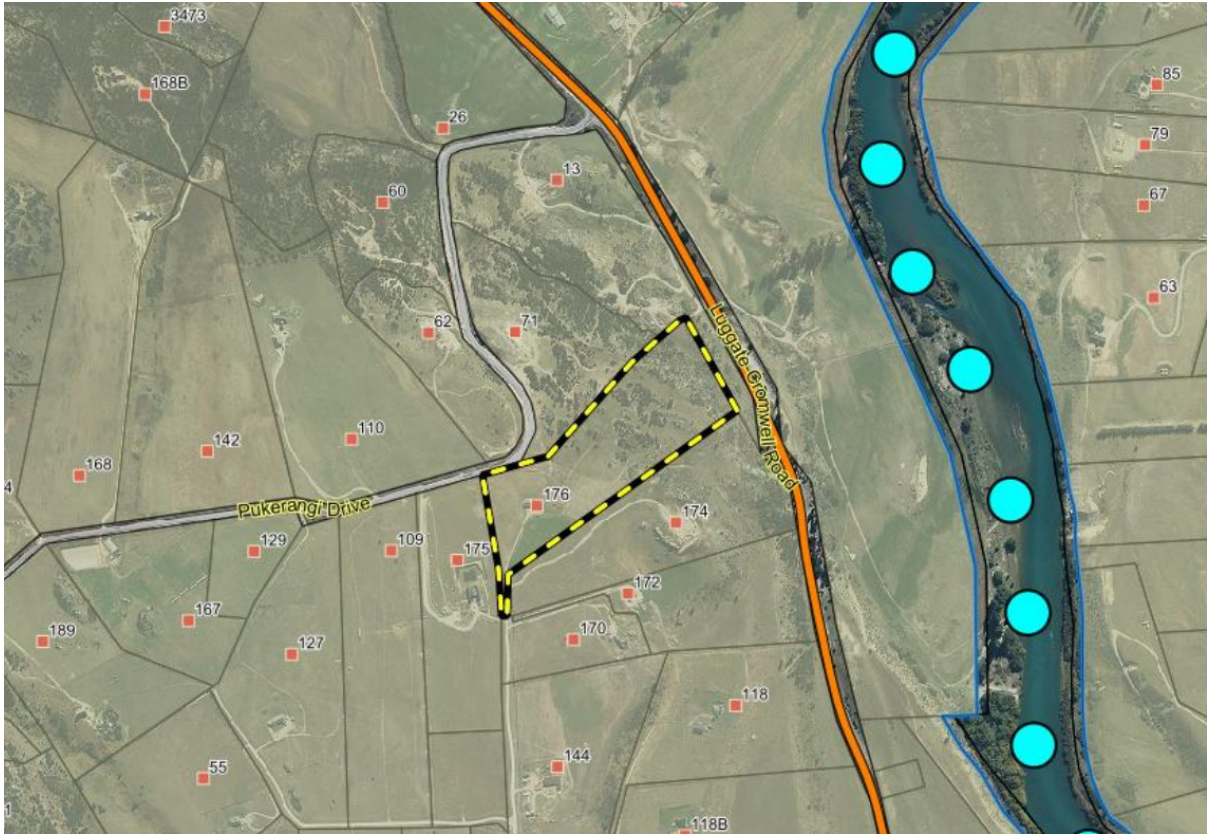


Figure 1: Subject Site (yellow and black line), and surrounding land (Source: CODC GIS).

DESCRIPTION OF ACTIVITY

The applicant wishes to subdivide LOT 10 DP 328097 into two allotments and established a residential building platform on new Lot 2. Details of the new proposed allotments are outlined below.

- Lot 1 will have an area of 4.02 hectares (ha) and will contain the existing dwelling and sheds. Lot 1 will be accessed from the existing vehicle access off Pukerangi Drive and will retain the existing services.
- Lot 2 will have an area of 4.03 ha and will contain the new 705 square metre (m²) residential building platform. Lot 2 will be accessed from an existing vehicle access points off Pukerangi Drive and Queensberry Terrace via a Right of Way (ROW) over Lot 1. Water and power connections will be extended to Lot 2; and on-site wastewater disposal, stormwater disposal, and domestic and firefighting storage will be established by the new landowner or successor at the time of constructing a new dwelling.

The proposed subdivision plan is shown in Figure 2 below:

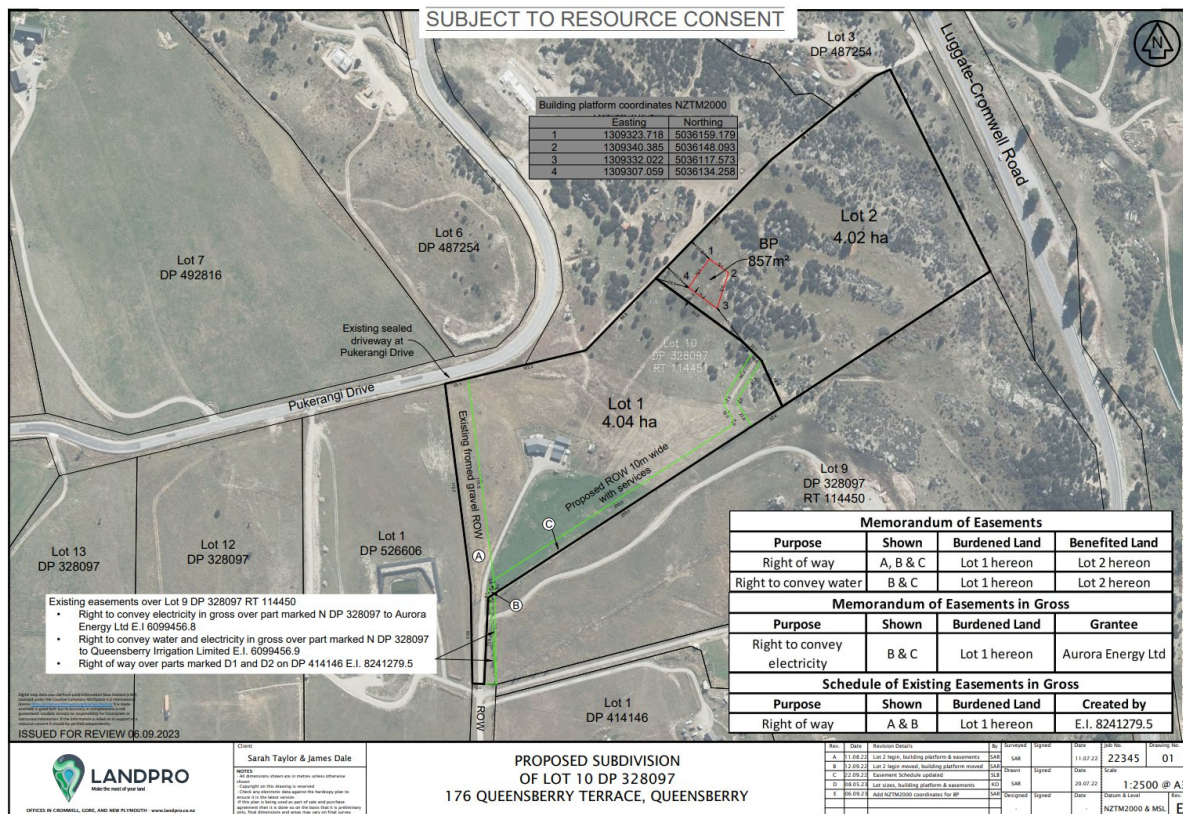


Figure 2: Updated Subdivision Plan (Source: Further Information Response dated 25 September 2023)

REASONS FOR APPLICATION

Central Otago District Plan

The subject site is located within the Rural Resource Area of the Central Otago District Plan (the District Plan).

Rule 4.7.4(iii)(b) states that where a subdivision will create allotments with an average size of no less than 8 hectares and a minimum allotment size of no less than 2 hectares then this is a discretionary activity.

In this instance, it is noted that all allotments have an area less 8 ha, averaging 4.03 ha. The subdivision is a non-complying activity pursuant to Rule 4.7.4(iii)(b).

Rule 4.7.3(vii) of the Central Otago District Plan provides for residential building platforms as a restricted discretionary activity providing the performance standards set out in Rule 4.7.3(vii) (a-d) are met.

In this instance, there will be only one residential building platform established on Lot 2, no additional formed accesses will be created to any State Highway, and a separation distance of 50 m between platforms and existing and proposed dwellings will be achieved. However, the proposed building platform does not comply with 25 m setback with the new boundary to the west, as well as the neighbouring boundary to the north in accordance with Rule 4.7.6A(a).

To breach Rule 4.7.6A(a) is a restricted discretionary activity in accordance with Rule 4.7.3(i). To establish a building platform that complies with Rule 4.7.3 (vii) (b-d) is a restricted discretionary activity.

National Environmental Standards

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESCS) came into effect on 1 January 2012. The National Environmental Standard applies to any piece of land on which an activity or industry described in the current edition of the Hazardous Activities and Industries List (HAIL) is being undertaken, has been undertaken or is more likely than not to have been undertaken. Activities on HAIL sites may need to comply with permitted activity conditions specified in the National Environmental Standard and/or might require resource consent.

The Otago Regional Council's Hazardous Activities, Industries and Bores database does not identify HAIL activities within the application site. The application has indicated that there is no evidence to suggest that HAIL activities has been undertaken on the application site. The site has not or is not likely to have had HAIL use in accordance with Regulation. I therefore consider that the NESCS is not triggered by this application.

There are no other National Environmental Standards relevant to this application.

Overall Status

Where an activity requires resource consent under more than one rule, and the effects of the activity are inextricably linked, the general principle from case law is that the different components should be bundled, and the most restrictive activity classification applied to the whole proposal.

In this case, there is more than one rule involved, and the effects are linked. As such, I consider it appropriate that the bundling principle established in *Locke v Avon Motor Lodge* (1973) is applied, and that the application is considered as a non-complying activity pursuant to sections 104, 104B and 104D of the Resource Management Act 1991 ('the Act').

SECTION 95A NOTIFICATION

Step 1 – Mandatory public notification

Public notification has not been requested. (s95A(3)(a)).

There has been no failure or refusal to provide further information or the commissioning of a report under section 92(2)(b) of the Act (s95A(3)(b)).

The application does not involve the exchange of recreation reserve land under section 15AA of the Reserves Act 1977 (s95A(3)(c)).

Step 2 – Public notification precluded

There are no rules or national environmental standards precluding public notification (s95A(5)(a)).

The proposal is not exclusively for controlled activities and/or boundary activities (s95A(5)(b)).

Step 3 – If not precluded by Step 2, public notification is required in certain circumstances

The application is not for a resource consent for one or more activities, where those activities are subject to a rule or national environmental standard that requires public notification (s95A(8)(a)).

A consent authority must publicly notify an application if it decides under s95D(8)(b) that the activity will have or is likely to have adverse effects on the environment that are more than minor (s95A(2)(a)). An assessment under s95D is therefore made below.

ASSESSMENT OF EFFECTS ON THE ENVIRONMENT (s95D)

MANDATORY EXCLUSIONS FROM ASSESSMENT (S95D)

- A: *Effects on the owners or occupiers of land on which the activity will occur and on adjacent land (s95D(a)).*
- B: *An adverse effect of the activity if a rule or national environmental standard permits an activity with that effect (s95D(b) (the permitted baseline, refer to section below).*
- C: *In the case of a restricted discretionary activity, any adverse effect that does not relate to a matter for which a rule or national environmental standard has restricted discretion (s95D(c)).*
- D: *Trade competition and the effects of trade competition (s95D(d)).*
- E: *Adverse effects on any parties who have provided written approval must be disregarded (s95D(e)).*

PERMITTED BASELINE (S95D(B))

Under Section 95D(b) of the RMA, an adverse effect of the activity on the environment may be disregarded if the plan permits an activity with that effect. That is, an application can be assessed by comparing it to the existing environment and development that could take place on the site as of right, without a resource consent, but excluding development that is fanciful. In this case, there are no permitted activity subdivisions under the Central Otago District Plan and therefore no permitted baseline can be applied to this proposal.

ASSESSMENT: EFFECTS ON THE ENVIRONMENT

The proposal involves creating two new allotments and establishing a residential building platform on new Lot 2 within the Rural Resource Area in Queensberry. Lot 1 will have an area of 4.04 ha and will contain the existing dwelling and sheds. Lot 2 will have an area of 4.03 ha and will contain the new residential building platform. The subdivision will result in an average allotment size of 4.03 ha, which is approximately 50.4% less than the permitted average allowed for in the Rural Resource Area.

Receiving Environment

The existing and reasonably foreseeable receiving environment is made up of:

- The existing environment and associated effects from lawfully established activities;
- Effects from any consents on the subject site (not impacted by proposal) that are likely to be implemented;

- The existing environment as modified by any resource consents granted and likely to be implemented; and
- The environment as likely to be modified by activities permitted in the district plan.

For the subject site, the existing and reasonably foreseeable receiving environment comprises a flat area surrounding an existing dwelling and sheds cultivated by the applicant. The site then slopes down and levels out to where the proposed building platform is located. Beyond the proposed building platform, the land slopes down towards the neighbouring land which separates the site from State Highway 6. The sloping area of the section contains rocky outcrops, and scattered native scrubs (i.e., prominently kanaka, and grassland).

For adjacent land, the existing and reasonably foreseeable receiving environment is characterised as rural lifestyle blocks located on rolling to steeply sloping land that intersperse with rocky outcrops and scattered native scrubs. There are residential dwellings, and ancillary buildings scattered throughout the area.

It is against these that the effects of the activity must be measured.

1. *The effects of the subdivision and future development on amenity and character*

The immediate area is characterised by rural lifestyle blocks located on rolling to steeply sloping land that is interspersed with rocky outcrops and scattered native scrubs. There are residential dwellings and ancillary buildings scattered throughout the area. It is important to note that the surrounding landscape has become highly modified since the subject site was created. The subject site was created as part of a 20-lot subdivision in 2004. The allotments created were typically between 8.0 – 8.8 ha. Since then, the land has been further developed. Nine of the 20 lots have been subdivided over the last 13 years. The existing environment now comprises of a total of 26 properties that have an area between 2 – 8 ha. The average allotment size in this area is 6.31 ha. Of these 26 properties, 18 properties have been developed to include at least one residential dwelling. Two of the 18 properties contain consented secondary dwellings. The proposed subdivision will result in an additional allotment bringing the total allotments in the area to 27, reducing the average allotment size to 5.86 ha (7% reduction).

Development at the density proposed (half of the average 8 ha average prescribed in the plan) has significant potential to change the open natural character of the rural landscape in which it is located. The objectives and policies of the Plan (in particular Objective 4.3.3, Policy 4.4.2, and Policy 4.4.10), explicitly seek to protect the “*open space, landscape, natural character and amenity values*” of the Rural Resource Area. It is considered that such values are intrinsic to the Rural Resource Area and not wholly dependent on whether or not a site is ‘visually prominent’ or separated by topography.

The application leans on the argument that Queensberry is characterised by rural lifestyle living within a modified area which favours smaller lots and less intensive productive uses. The application considers proposed subdivision and use of Lot 2 for rural lifestyle living to be in accordance with the character of the surrounding landscaping. No landscaping assessment prepared by a suitability qualified and experienced professional was provided in the application to support the applicant’s assessment.

It has been identified that a landscape assessment was prepared by Vivian + Espie and dated 24 June 2021, for a similar subdivision at Queensberry (RC 210237) at 11 Totara Place, Queensberry. RC 210237 was granted by the committee on the 30 November 2021, and has since then been given effect to. The landscape report states that the “Queensberry terraces area has been developed for rural living. However, the larger lot

sizes and open paddocks associated with each residential development ensure the area retains a pleasant, somewhat open agricultural landscape character". In this particular case the development was located on the terraces rather than the slopes of the Pisa Ranges, in an area that is less sensitive to change and had the capacity to absorb development without compromising the open character or affecting hill slopes and ranges. I do not consider that the findings of the landscape report prepared for RC 210237, is of any particular relevance to this proposal and it would not be appropriate to give it any particular weight. .

A site visit to assess the visual effects of the proposal with particular regard to the location of the residential building platform was undertaken on the 22 August 2023. Profile poles had been erected at four corners of the residential building platform. The proposed residential building platform is located on a gentle slope at the top of the northwest corner of Lot 2. The slope will be cut into to create a flat building platform. Beyond the building platform to the west and south the land slopes up, and to the north and east the land slopes down and flattens out before further sloping down towards Luggate-Cromwell Road. The building platform does not protrude through the skyline due to the land that slopes up towards Lot 1.

The site is surrounded by rocky outcrops and scattered native scrubs, and there are dwellings scattered throughout the area on neighbouring sites. There are approximately five houses that are visible from Luggate-Cromwell Road (State Highway 6) to the north of the site. Two of these dwellings located at 13 and 71 Pukerangi Drive (to north and northeast of the site) are visual prominent, however the other dwellings appear to be integrated into the existing environment. There is only one dwelling visible from the building platform, and that is the dwelling on located at 71 Pukerangi Drive. The landowners of the adjacent properties to the north (71 Pukerangi Drive) and south of the site (176 Queensberry Terrace, Luggate) have provided written approval and therefore any effects on these persons are disregarded.

The applicant agrees that the dwelling on the proposed building platform will be visible from State Highway 6, as well as on Lot 1 DP 46676 and properties across the Clutha River / Mata-Au. However, the application concludes that the effects on the visual amenity values will be less than minor, given the building platform is significantly set back from viewing locations, it will be partially screened, there is no skyline breach and providing the mitigation measures are adopted.

The following mitigation measures were discussed and agreed to by the applicant:

- Any dwelling and building accessory to the dwelling located on Lot 2 must be located on the residential building platform identified on the approved survey plan.
- Any dwelling and building accessory to the dwelling located on the residential building platform must have a maximum height no greater than 6.5 metres above the ground level as presented in the Earthworks Plan.
- No potentially wilding species are to be planted on the land. This includes all Pinus species, Douglas Fir, and Larch.
- Boundary Fencing shall be restricted to post and wire and/or post and rail.
- No clearance of any native vegetation or kanuka shrubland in excess of 2000 square metres (m²) or within 20 metres of a natural water course shall be permitted, inclusive of any clearance require for a building site, and/access.
- No quarrying, disturbance or excavation of natural schist rock outcrop is permitted.

As I mentioned above, no landscape assessment was provided in the application to support the applicant's argument, therefore it is difficult to determine whether the mitigation measures would be effective at reducing the visibility of the future residential activity and maintain the open rural character of the receiving environment. It is acknowledged that the proposed subdivision could increase the density of domestic activity as viewed from public places, having adverse effects on the character and amenity values of the receiving environment.

There are no reserves or public conservation land, heritage sites, notable trees, or areas of significant indigenous vegetation, or named water bodies that will be affected by the proposal.

In my opinion, the degree of change the proposed subdivision will have on the existing environment could potentially be minor or more than minor given the smaller average allotment sizes which are not anticipated to occur in the Rural Resource Area, and the increased intensification of domestic activity an additional residential activity will have on the receiving environment.

2. *Sustainable use of productive land and soil resource and reverse sensitivity effects*

The subject site has land use Class 3 and 4 soils (as shown in Figure 6 below). The land and the soils are described as flat to undulating alluvial plains and terraces below 400 m above sea level (asl) with shallow and/or stone brown and yellow grey earth soils of medium to high fertility on plains and terraces in the dry inland areas. The land use capability of the soils are shown in Figure 3 below.

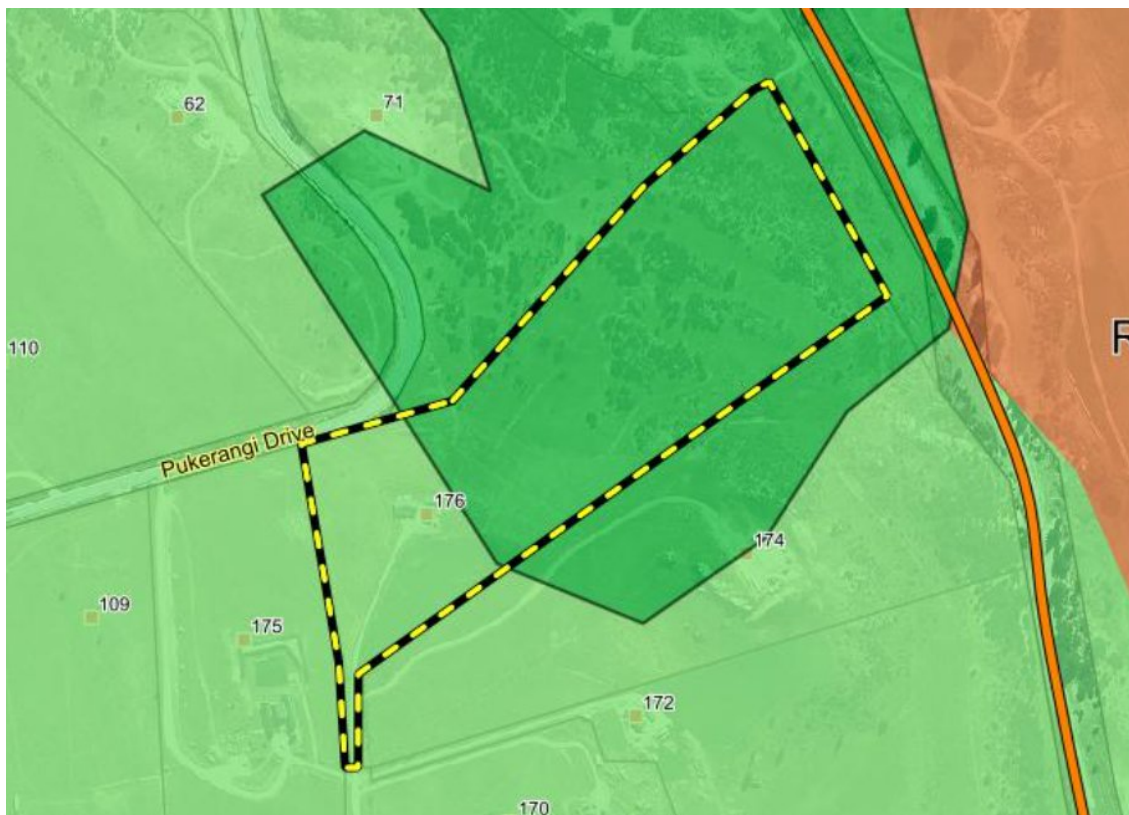


Figure 3: Land Use Capability (LUC) of the subject site (subject site is outlined in dotted yellow and black line). LUC 3 is dark green, and LUC 4 is light green (Source: CODC GIS).

NPS-HPL therefore applies to this subject, part 3.8 of NPS-HPL clearly states that that the subdivision of highly productive land should be avoided unless the applicant can

demonstrate that the proposed lots will retain the overall productive capacity of the subject land over the long term.

The application provided a productivity assessment, however it was determined that additional evidence was required to support the assessment. This information was requested on the 30 August 2023. The applicant provided further information on the 25 September 2023, which confirmed Lot 1 is suitable for land base primary production, although it is limited by the existing dwelling, right of way and other infrastructure. In the past the applicant has grown lucerne on Lot 1 and any future economically viable use of Lot 1 for land based primary production is limited to growing lucerne or a similar crop.

Lot 2 has very little land that is not constrained by slope, and these areas are highly fragmented and awkwardly shaped, and therefore cannot support economically viable land based primary production. The applicant's conclusions are supported by Grow Otago maps, which demonstrate that Lot 2 contains pallic soils that are low in fertility, and Lot 1 contains pallic and brown soils that have low and moderate fertility levels respectively. Overall, Overall, the applicant concludes that the proposed subdivision will not result in significant loss of Highly Productive Land (HPL).

The subject currently has an existing irrigation water supply of 100,000 L per day. This existing allocation will be split; Lot 1 will get 80,000 L per day, and Lot 2 will get 20,000 L per day This allotment was confirmed by Queensberry Irrigation Limited in the further information response received 25 September 2021.

I undertook a site walkover on the 22 August 2023 and, while I generally agree with the applicant's productivity assessment given constraints of the topography and placement native vegetation and rocky outcrops on the site, I note that the NPS-HPL provides a strong directive to avoid subdivision that will result in any reduction in productive values over the long term.. It is also noted that the applicant nor myself are suitability qualified and/or to undertake a productivity assessment, with particular regard to the NES-HPL. Further consideration of the appropriateness of the proposal against the NPS-HPL will need to be considered in the section 104 assessment for this application.

In relation to reverse sensitivity, although rural activities such as horticulture, viticulture, and agriculture can occur as a permitted activity the topography, outcrops, and native vegetation on neighbouring sites make this challenging. The landowners of the adjacent properties to the north (71 Pukerangi Drive) and south of the site (176 Queensberry Terrace, Luggate) have provided written approval and therefore any effects on these persons are disregarded. The proposals is not expected to result in reverse sensitivity effects on the other neighbouring properties, and properties located in the wider environment given the separation distance, the topography and the vegetation scatted through the area. .

Overall, adverse effects on the productive capacity of the soils are potentially more than minor, and reverse sensitivity effects on neighbouring properties are considered to be less than minor.

3. *The adequacy of the allotment*

The application has provided a summary of the servicing arrangements for the proposed subdivision, which are outlined in Table 1 below.

Table 1: Proposed Services for the subdivision (Source: Application).

Service	Proposed servicing
Stormwater and wastewater	Ground conditions and the size of Lot 2 provide suitable conditions for the disposal of wastewater and stormwater.
Domestic and portable water	The applicant has an existing share of the Queensberry Irrigation Limited Water Scheme (QIS). The QIS enables the applicant to take 5,000 litres per day for domestic purposes and 100,000 litres per day for irrigation. It is proposed that Lot 1 receives 2500 litres of domestic water per day, and 80,000 litres of irrigation water per day. Lot 2 would receive a supply of 2500 litres of domestic water per day and 20,000 litres of irrigation water per day.
Fire fighting	Prior to the completion of any dwelling, firefighting water storage will be provided in accordance with SNZ/PAS 4509:2008; or in the alternative, such other means of firefighting as approved in writing by Fire and Emergency New Zealand.
Power, telephone and internet	It is proposed to extend electricity and telecommunication services from the existing network to the boundary of Lot 2.

Council's Environmental Engineering Team have reviewed the proposed servicing arrangements and indicated the following:

- Prior to the issue of the consent, evidence for the water supply should be provided to the Council; and
- Prior to S224(c) Certification:
 - a report from a suitability qualified and experienced professional is provided to confirm that the existing on-site wastewater disposal system on Lot 1 is in good working order and that Lot 2 is suitability of the ground for wastewater disposal,
 - underground power and telecommunication are installed, and
 - a consent notice is prepared for registration on Lot 2 requiring the consent holder or successor to install domestic and firefighting storage, wastewater, stormwater, and telecommunication at the time of constructing a dwelling.

The applicant provided confirmation that potable water will be provided from the Queensberry Irrigation Scheme and demonstrated that Lot 2 is suitable for wastewater disposal in a further information response dated 25 September 2023. Following the further information response, it is recommended that standard engineering conditions in relation to water supply, wastewater for Lot 1, power and a requirement to register consent notice conditions (as stated above) on the Record of Title are imposed on any consent granted.

The application and further information demonstrate that the site will be adequately serviced. Overall, subject to compliance with the consent conditions I consider the lots to be adequately serviced for its intended purpose, and the effects on the receiving environment are considered to be less than minor.

4. Access

The subject site currently accessed off Pukerangi Drive, and Queensberry Terrace (private right of way). The applicant proposes to access Lot 1 from the existing vehicle access off Pukerangi Drive, and Lot 2 will be accessed from an existing vehicle access

points off Pukerangi Drive and Queensberry Terrace via a Right of Way (ROW) over Lot 1.

Discussions have taken place between engineering and the planning team, in relation to the requirement to seal a portion of Queensberry Terrace (right of way), and vest the road with Council, given there are at least 20 properties accessing off Queensberry Terrace. No traffic assessment was required to assess the access given the demand and use of Queensberry Terrace will remain the same as a result of this subdivision and, as such, I do not consider it appropriate to require the applicant to seal and vest a proportion of Queensberry Terrace.

However, the subdivision will result in an additional lot using the right of way over Lot 1. The right of way is currently used by 4 properties, and this will be increased to 5 as a result of this subdivision. Pukerangi Drive is sealed road and has the ability to support an additional lot using this access, without having adverse effects on neighbouring properties. To protect the access to the existing and proposed property, I recommend that an appropriate easement is confirmed at the time of the survey at the S223 stage.

In relation to formation and maintenance of the right of way over Lot 2 Engineering recommends that prior to S224c certification:

- the existing vehicle entranceways from Pukerangi Drive and Queensberry Terrace to proposed Lot 1 are demonstrated to comply with the requirements of Part 29 of Council's Roading Policies January 2015, or be upgraded in accordance with these requirements.
- The Rights of Way (ROW) comprising areas A, B, and C as the shown on the scheme plan extending off Pukerangi Drive and Queensberry Terrace shall be constructed in accordance with the 'Right of Way' requirements of Table 3.2 (a) of Council's July 2008 Addendum to NZS 4404:2004.

The engineer's recommendations are adopted for the purposes of this report and, subject to compliance with recommended conditions of consent, I consider that the access to serve the proposed lots is adequate and will not result in adverse effects on the transportation network.

5. *Hazards*

No hazards have been identified in the planning maps for this property.

6. *Earthworks*

Earthworks will be required to establish the proposed building platform on Lot 2, form the right of way, and install services. The applicant has indicated that the proposed track will comply with the relevant construction standards outlined in Rule 4.7.6.J.a of the District Plan. The earthworks required to establish the building platform are proposed to be over an area of approximately 1,500 m², and a quantity of 1,809 m³ which comply with the requirements outlined in Rule 4.6.7.b of the District Plan.

The site is elevated and surrounded by kanuka and schist outcrops, the earthworks are unlikely to be visible from the site, however there may be some disturbance from contractors' travelling to and from the site.

Overall, I consider the proposed and anticipated earthworks including access carriageways and planting are not considered likely to have a notable adverse affect on open space, natural character and amenity values.

DECISION: EFFECTS ON THE ENVIRONMENT (S95A(2))

Overall, the proposed activity is likely to have adverse effects on the wider environment that are more than minor. Therefore, public notification is required under Step 3.

Step 4 – Public Notification in Special Circumstances

Public notification is required if the consent authority decides such special circumstances exist as to warrant the application being publicly notified (s95(9)(a)).

Current case law has defined ‘special circumstances’ as those “*outside the common run of things which is exceptional, abnormal or unusual, but they may be less than extraordinary or unique.*” The court has also found that special circumstances are deemed to apply where there is likely to be high public interest in the proposal [*Murray v Whakatane DC [(1997) NZRMA 433 (HC), Urban Auckland v Auckland Council [(2015) NZHC 1382, (2015) NZRMA 235]*].

There is nothing exceptional or unusual about the application that makes public notification desirable in this particular instance. As such, there are no special circumstances that warrant the application being publicly notified.

OVERALL DECISION - S95A NOTIFICATION

Pursuant to 95A(5)(b)(i), public notification is required as identified in the assessment above.

PARTIES TO BE SERVED NOTICE

In addition to the usual list of statutory and interested parties to receive direct notification of publicly notified applications, I recommend that directly adjoining landowners (who have not provided written approval) listed below be served direct notice of the application:

Stewart Samuel Norman	Blake Craig Stephen	13 Pukerangi Drive, Queensberry	LOT 3 DP 487254
Blake Craig Stephen	Agabin Pamela Hidalgo	62 Pukerangi Drive, Queensberry	LOT 6 DP 487254
Binns Russell John	Binns Yvonne Marie	110 Pukerangi Drive, Queensberry	LOT 7 DP 492816
Einberger Julia		175 Queensberry Terrace, Luggate	LOT 1 DP 526606

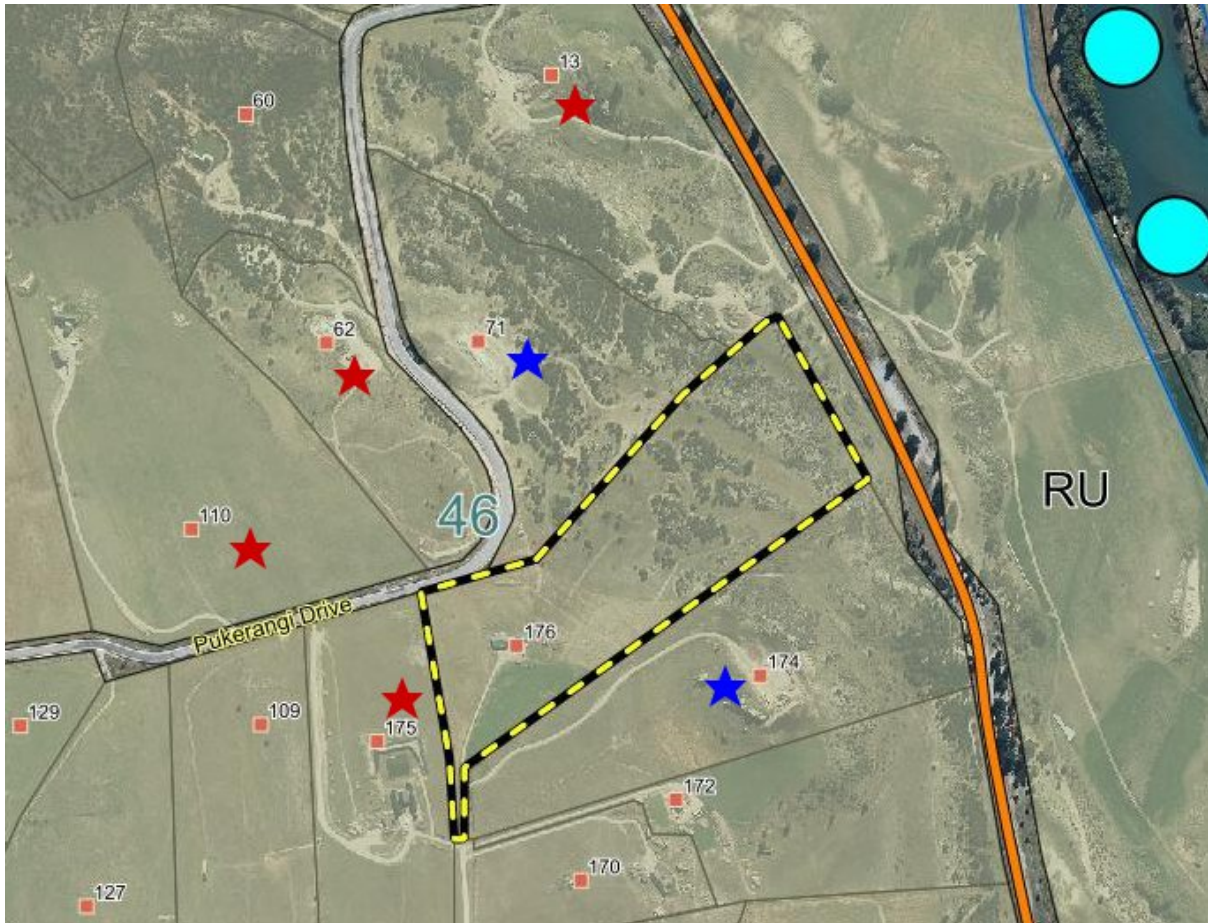


Figure 4: GIS Aerial Map of the site. Blue star annotations indicate parties who have provided APA's. Red stars indicate parties to be served direct notice.

Prepared by:

Stephanie Dwyer
Planning Officer

Date: 27 October 2023

Reviewed by:

Oli Monthule-McIntosh
Consultant Planner

Date: 27 October 2023

Approved under Delegated Authority by:

A handwritten signature in blue ink that reads "Lee Webster". The signature is written in a cursive style with a large initial "L".

Lee Webster
Planning and Regulatory Services Manager

Date: 30 October 2023