

SUBMISSION ON PLAN CHANGE 8 TO THE SELWYN DISTRICT PLAN – VOLUME 2, RURAL SECTION

UNDER CLAUSE 8 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

To: The General Manager
Selwyn District Council
PO Box 90
Rolleston 7643

Name: K McIntosh, Wha Jung & Se Kyung Lee
Postal Address: c/- Fiona Aston Consultancy Ltd
PO Box 1435
Christchurch 8140
Telephone: 03 3828898
Fax: 03 3828858
Email: fiona.aston@xtra.co.nz

Our response:-

We oppose Plan Change 8 in its entirety.

The reasons for our response are outlined below.

1. Background

Property Location

We own two adjoining 4 ha blocks of land located in the south Lincoln, legally described as Lots 120 and 121 DP 329124, and as shown on the plan attached as Attachment A. The only access to our blocks is via a 6m wide formed right of way (10m legal width) which runs along the western boundary of the Mostyn block. The access also serves 7 rural lifestyle blocks to the north, and connects with Allendale Lane, an existing residential cul de sac (also shown on the Attachment A plan).

At this stage neither of our two blocks has a dwelling, although one dwelling could be erected on each block as a permitted activity. Farming our two properties is difficult, due to the fact that the only access is via a residential subdivision, and we have rural lifestyle activity to the north. It is not possible to bring heavy farm machinery onto the property, and cropping activities are limited e.g. growing lucerne, because we cannot harvest at nighttime with heavy machinery and night lights due to reverse sensitivity effects with residential neighbours. There is an ongoing security risk, with the constant concern that farm gates will be opened with the escape/loss of stock into the adjoining residential subdivision.

We purchased our properties in 2003 with the intention of subdividing them into 1 ha lots, in accordance with the then Proposed Selwyn District Plan '1 km rule'. This provided for subdivision and a dwelling on 1 ha lots (or larger) as a discretionary activity within a 1km radius of the District's townships.

In 2007 we applied for a resource consent to subdivide our two properties into a total of 8 x 1 ha lots, each with a dwelling. Land immediately to the north had been subdivided into 4 x 1 ha lots and 2 x 2 ha lots in 2005. Prior to the hearing, we amended our proposal by reducing the number of proposed lots to 4 x 2 ha lots.

Our 2007 consent was declined by the Commissioner, principally on the grounds that he considered that two additional dwellings 'over and above' the permitted baseline of one dwelling per 4 ha would result in adverse effects on the amenity of adjoining rural lifestyle block owners to the north and local rural landscape character. In particular, he considered that the rural lifestyle block owners currently enjoy a rural outlook which would be adversely affected, and that the current tranquil setting would be adversely affected by the additional traffic generated by two additional residential dwellings above the 'permitted baseline'.

The rural lifestyle blocks to the north are shown as Stage 2 residential areas in the Lincoln Structure Plan (LSP) but are zoned Inner Plains Rural under notified PC7.

In light of the changed planning status of the land surrounding the Site (see also discussion below under 'Site and Locality') we submitted a new application for a 8x 1 ha rural residential in July 2009. That application is currently on hold pending consideration of servicing options.

Provisions of Change 1 to Canterbury Regional Policy Statement (Change 1), Lincoln Structure Plan and PC7 As They Affect our Properties and Environs

Our land is excluded from the Urban Limits (UL) in Change 1, and retains its Rural Inner Plains zoning under PC7 and in the Rolleston Structure Plan.

Our blocks are shown as part of a wetland system in the Lincoln Structure Plan. The wetland system includes our blocks, the Council's sewerage treatment site and a substantial part of the Broadfield Estates block to the east. The approved ODP for the Broadfields Estates block (PC4) has substantially reduced the area of wetlands within the Broadfields Estate land.

We understand that the proposed wetland areas are intended to mitigate the effects of stormwater runoff from new proposed residential growth areas, in particular the large 'Dairy' block to the west (Lincoln Land Developments Ltd block), proposed for a mix of 'standard' and medium density residential activity. This block is lowlying and stormwater drainage is difficult.

LLD have recently obtained consent for an onsite stormwater discharge system, involving a series of swales, wetlands and detention areas within the site. The Council's Asset Manager Utilities, despite a written request 5 months ago, has not been able to confirm whether or not and if so why our land is still required for stormwater management purposes. It would appear that it is not.

In any case, our land is not suitable for stormwater wetlands. The wetland areas shown in the Lincoln Structure Plan are indicative only and detailed investigative work e.g. levels have not been taken which would establish the feasibility or otherwise of using our land for the purposes of wetland. Apart from a small portion at the southern end, our land is considerably higher than the Dairy land to the west, and the Broadfields Estate land to the east.

We did not oppose the Rural Inner Plains zoning under C1 or in the Lincoln Structure Plan as we were not aware of either of these documents at the time when they were open for submissions.

We have submitted on PC7, seeking that that our land and the rural residential blocks to north legally described as Lot 1-6 DP 371976 be included within the PC7 Living Z Zone and, if staging is retained (which we oppose), staged for immediate development.

It is understood that the hearing of submissions on PC7 was to be in early November 2010 but is now delayed until the new year due to other staff work priorities arising from the recent Christchurch earthquake.

Selwyn District Council Rural Residential Background Report and Proposed Plan Change 17 Rural Residential

We made a submission on the Draft RR Report, seeking that our land be included as a preferred rural residential area in PC17 Rural Residential.

2. Suitability of McIntosh, Jung and Lee Land for Rural Residential Purposes

Key features of our 8 x 1ha rural residential proposal are:-

- Yield of 8 lots, with an average density of 1 ha;
- A high amenity environment with proposed lots enjoying an attractive outlook onto the enhanced L1 Creek;
- Proposed building platforms sited a minimum of 150m from the SDC wastewater plant on the adjoining property to the west (notwithstanding that such a separation is unlikely to be required once Lincoln sewerage is piped to Rolleston Pines and the existing infrastructure at Lincoln is only required for emergency/holding purposes);
- Strong physical edges to the subdivision defined by existing/proposed physical features, including Council designated wastewater plant/possible stormwater wetlands and LLD proposed residential subdivision to west (the Dairy block); existing rural residential subdivision to the north, proposed to be zoned Living 1 under draft PC7; L1 Creek to east, with the Deferred Living 1 zoning beyond (Broadfield subdivision); and the proposed Lincoln Southern Bypass, Inner/Outer Rural Plains boundary and an existing water race to the south;
- Enhancement of L1 Creek on its western site, including a 10m wide esplanade reserve (consistent with the width of the esplanade reserve for the rural residential lots to the north), and riparian enhancement;
- An opportunity for an extension of the walkway/cycleway linkage along the L1 Creek from the Liffey Reserve to our land. proposes a rural residential development with a yield of approximately 112 lots, with an average size of 5000m².

Clearly our land is ideally located to become a peri-urban rural residential area, including for the following reasons:-

- It adjoins existing rural residential development to the north, and beyond this the existing Ryelands urban subdivision, and as such is within easy cycling distance of the existing

Lincoln town centre and offers good connectivity to the existing urban areas of Lincoln by a variety of transport modes.

- The location and site features offer significant opportunities for environmental enhancement and design solutions and mitigation measures which achieve rural residential character and preserve openness and a very high amenity development, consistent with the RR Report criteria.

We note that at the PC4 (Broadfields Estate) hearing, the Council's Consultant Landscape Architect (Andrew Craig) provided a favourable assessment regarding the suitability of our land for rural residential purposes as follows:-

.. "in terms of their general character and amenity these (rural residential lots) would be consistent with that of the neighbouring Ryeland development. Additionally, the submitter's land is quite well enclosed by natural and physical boundaries, namely the L1 and L2 Creeks, the wastewater treatment plant and a water race to the south. Thus the submitter's land is strongly contained where pressure for further outward growth would be substantially curtailed. Further there would be benefit whereby the subdivision would trigger enhancement of the esplanade reserve on the submitter's side of the L1 Creek. Finally, such a proposal would be contiguous with the township and PC4 land."

3. Proposed Private Plan Change 8 (Holmes block)

Selwyn Plantation Board seeks to rezone two former Selwyn Plantation Board forestry blocks on the west/south west boundary of Rolleston – PC 8 refers to the Holmes block (92 ha) and PC9 to the Skellerup block (72 ha).

The blocks are to be rezoned Living 3, a new living zone with an average lot size of 5000m² and minimum size of 4000m². The maximum number of rural residential lots for the Holmes Block is 125 and for the Skellerup block, 100. Both plan changes include a rule which states that within the Rural 3 zone west of Dunns Crossing Road there will be:-

- No more than 125 rural residential lots created by subdivision within the period ended 31 Dec 2016; and
- No more than a further 125 rural residential lots created by subdivision within the period 1 Jan 2017-31 Dec 2026

Development is to be subject to Outline Development Plans included as part of the PCs. A principal mechanism proposed to ensure the L3 zones have a rural character, is the incorporation of Countryside Areas within the subdivision and along the Dunns Crossing Road frontage in the case of the Holmes block. The Countryside Areas will be 50m wide and are to be used for rural productive purposes, compatible with adjoining rural residential activity (grazing/Lucerne cropping are suggested). They will be privately owned and probably managed by a body corporate.

In combination, PCs 8 & 9 take up a substantial amount (37.5%) of the total allocation of rural residential households under Change 1 to the RPS for the next 35 years, up until 2041 i.e. 225 of the 600 households; and 63% of the allocation for each of the 1st two planning periods i.e. 125 of the 200 households allocated for each of the periods 2007-2016 and 2017-2026.

PC8 alone takes up 20.8% of the total allocation of households under Change 1 (125 households). The PC8 and 9 rules do not allocate the number of households between the two plan change areas for the first and second planning periods, just stating a total allocation for both ie. the L3 zone west of Dunns Crossing Road.

4. Principal Reasons for Opposition to Private Plan Change 8

- (i) The rezoning sought by PC 8 is contrary to the Resource Management Act 1991, in particular Part 2 Purpose and Principles and s31 1a) the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.
- (ii) The rezoning is inconsistent with relevant statutory documents and other relevant matters, including the Canterbury Regional Policy Statement, Change 1 to the RPS, the Selwyn District Plan and Rolleston Structure Plan.
- (iii) The s32 Assessment for PC8 is inaccurate, inadequate and incomplete.
- (iv) Staging – PC8 seeks that 125 sections i.e. potentially all of the PC8 proposal, be staged to proceed in the first planning period i.e. 2007-2016. The documentation supporting PC8, including the AEE, does not address how this might impact on the availability of infrastructure for new urban greenfield areas at Rolleston allocated under C1 and the Rolleston Structure Plan. Accordingly, the logical and orderly development of Rolleston township, in accordance with the Rolleston Structure Plan and C1, may potentially be compromised from a servicing perspective, if consent is granted to PC8. Such an outcome would be contrary to s7b) and s31 1a) of the Act, the efficient use and development, and integrated management, of natural and physical resources.

With respect to (i) - (iii) above, additional explanation is set out below.

5. Resource Management Act 1991, in particular Part 2 and s31 1a)

Sustainable Management

Separately and in combination, PC 8 and 9 will take a very significant portion of the allocation of rural residential households to Selwyn District under C1, especially for the initial planning periods (2007-2016 and 2017-1026) (see discussion above under '3. PC 8: Holmes Block).

It is not appropriate for such a large proportion of the allocation to be to one landowner, Selwyn Plantation Board. Rural residential opportunities need to 'spread' amongst landowners for each of the development phases specified in C1, and through different parts of the UDS area, in order to ensure competition and avoidance of land banking and thus enable people's needs for rural residential living to be fairly and appropriately met.

Effects on the Environment

PC8 will result in significant adverse effects on the environment, including but not limited to:-

- Reverse sensitivity effects with the existing and potentially future expanded Rolleston Pines Wastewater Treatment Plant (PWWTP), Resource Recovery Park (RRP) and Tegel poultry (TP) operation at Dunns Crossing Road.

The fact that the PC8 area includes an Odour Constraints Area (OCA) with respect to biosolids treatment, and the odour assessment also identifies an area affected by the recommended composting activity buffer, emphasizes how proximate the area is to potential significant odour sources.

PC8 It is not an appropriate location for rural residential activity, particularly when there are other alternative locations at Rolleston and in other parts of the District which are not subject to such constraints, and which in terms of achieving overall sustainable management outcomes, are much more appropriate and desirable for rural residential activity, including our land at south Lincoln.

- Inadequate integration with Rolleston Township and poor urban design outcomes.

The boundaries of PC8 and 9 are entirely related to land ownership considerations rather than being based on logical and defensible zone boundaries consistent with the sustainable management outcomes required under the Act. They are 'cadastral' and not *"discernible logical boundaries determined by strong natural or physical features"*, one of the locational requirements for preferred rural residential areas in the Council's RR Background Report.

Rural residential zoning of the PC8 and 9 areas would leave an intervening area of land currently held in a number of relatively small titles, some with existing dwellings, and a similar size to each of the PC8 and 9 blocks, being left 'sandwiched' between and separating the two proposed rural residential blocks.

The above intervening land would be a logical area for future extension of rural residential zoning, given that its proximity to existing odorous activities (PWWTP, RRP, TP) would not be a constraint, if the same approach to buffer distances/managing reverse sensitivity issues was taken as is proposed by the proponents of PC8 and 9. In fact, rural residential zoning of this intervening area would arguably be more justifiable in terms of sustainable management outcomes given the existing character of small lots and limited existing economic primary productive use. In comparison, the Holmes (PC8) and Skellerup (PC9) are comparatively large, regular in shape and in single ownership, so could support a range of economic productive uses.

Such pressure for further future rural residential rezoning (say another 125+ rural residential lots) would further comprise the Council's ability to ensure the sustainable provision of rural residential opportunities in UDS part of the District.

There would also be pressure to rezone for rural residential purposes, the land located south of the PC 9 (Skellerup) block south to Selwyn Road, to 'join' with the southern Urban Limit of Rolleston under C1, PC7 and the Rolleston Structure Plan.

The PC 8 and 9 rezonings would result in rural residential land adjoining Rural land on three sides, with no buffers of any kind to protect against potential reverse sensitivity effects e.g. roads, waterways. Whilst rural residential activity can act as a form of 'buffer' between residential and rural activity, it is desirable that it is also 'buffered' from adjoining rural activity where possible, as is the case with our land at south Lincoln. There is existing rural residential subdivision to the north, the Lincoln wastewater treatment plant and possible future stormwater ponding area to the west, a greenfield residential area to the west, and the proposed Lincoln Southern Bypass to the south.

- Potential 'internal' reverse sensitivity effects associated with the proposed Countryside Areas.

PC 8 (and 9) propose 50m wide Countryside Areas (CAs) both internally and along the Dunns Crossing Road frontage of the PC8 (and 9) areas. Their purpose is *"to provide a visual link to the surrounding rural landscape. These corridors bisect the residential activity and are to be managed in productive rural use."*¹

The proposed CAs are basically long 'corridors' of intended productive rural activity sited largely within the PC8 (and PC9) areas. As a consequence, there will be extensive boundaries with adjoining rural residential lots. There is no supporting technical report from an agricultural expert confirming whether such a proposed design is feasible and 'workable' i.e. the size and configuration of the CAs are adequate to be useable for productive purposes, and such use will not result in on-going reverse sensitivity effects between rural productive activity and rural residential activity.

It would appear that the CAs are a 'device' that is being proposed to create a 'rural character' to future subdivision enabled by the proposed rural residential zoning. Given the concerns above regarding the practicality and potential reverse sensitivity effects of the proposed CAs, it is far from certain that the high amenity/ rural character outcomes claimed for PC8 and 9 will be achieved in reality.

6. Relevant Statutory Documents, including Objectives and Policies

Selwyn District Plan

PC 8 and 9 are not in accordance with a number of District Plan objectives and policies, including those relating to reverse sensitivity effects (Township Volume Objective B3.4.3, Policy B3.4.38, Rural Volume Objective B3.4.2, Policy B3.4.19, Objective B4.1.2, Policy B4.1.8; provision for range of living environments/section sizes (Township Volume Objective B4.1.1, Rural Volume Objective B4.1.1); township and low density living environments form and location (Township Volume, Objective B4.1.3, Policy 4.3.5) and for Land to be rezoned for new residential or business development by use of a consistent and equitable process (Township Volume Objective 4.3.3).

Change 1 to the Canterbury Regional Policy Statement (C1)

PC 8 and 9 will give rise to significant reverse sensitivity effects with adjacent rural activities, including strategic infrastructure, one of the circumstances to be avoided under Policy 14 Rural Residential.

7. Section 32 Assessment

Section 32 of the Act requires an assessment of whether the PC8 proposed objectives are the most appropriate to achieve the purpose of the Act, and whether, having regard to the their efficiency and effectiveness, the policies, rules or other methods are the most appropriate for achieving the objectives. The assessment requires an assessment of alternative options for achieving the objectives.

¹ Amendment 33, PC 8 request

Purpose of Act/Objectives and Policies

PC8 and PC 9 are considered to be inconsistent with a number of the relevant RPS and District Plan objectives and policies (see discussion above under '6. Relevant Statutory Matters') so cannot be said to be the most appropriate method for achieving those objectives and policies.

Alternatives

The assessment of alternative methods for achieving the District Plan objectives and policies is inadequate, inaccurate and incomplete.

The only options considered are the status quo i.e do nothing, and retain current rural zoning (Option 1); PC8 i.e. rezone as a new Living 3 zone, with development to be in accordance with an ODP (Option 2); and a different (unspecified) suite of changes to the District Plan (Option 3).

Option 1:

The assessment of the benefits and costs associated with Option 1 (do nothing) are inaccurate and incomplete.

Additional benefits of Option 1 not identified in the PC8 & 9 documentation would be:-

- Avoid potential reverse sensitivity effects with existing and potentially expanded neighbouring land uses with noxious elements, including the PWWTP, RRP and TP.
- Retain opportunity for rural residential development in the District, especially in the short-medium term, in more sustainable locations, including our land at Lincoln. This opportunity is largely foregone if PC 8 & 9 succeed because of the very limited allocation of rural residential opportunities to the District over the next 35 years.
- The stated 'costs' of Option 1 would not arise, because the 71 submissions on the Council's recent Background Rural Residential Report, including our submission, early establish that there are other sustainable locations for rural residential activity in the District.
- Continued fragmentation of larger more economic farming units due to pressure to create 4 ha blocks to meet the unmet demand for rural residential lots – there are other sustainable locations for rural residential development in the District that will meet the demand, subject to the allocation constraints imposed by C1.
- Create pressure on the development of isolated sites for rural residential purposes – the 71 submissions on the RR Report clearly illustrate that there are many rural residential rezoning proposals close to existing townships which are not isolated and meet many of the RR Report preferred criteria for rural residential development;
- Reduced future land use opportunities – no further explanation of this 'benefit' is given, and it is unclear what is meant. Both the PC8 and PC 9 blocks are, separately, large enough for economic rural use.
- Piecemeal development due to multiple ownership of land – again no further explanation is given. Presumably this is a reference to the possible rural residential locations in multiple land ownership. Multiple land ownership is not necessarily a constraint to future development, as is evident by the co-operation between us in relation to future

development of our respective 4 ha blocks, over several years. Logical defensible boundaries in sustainable locations is a far more significant consideration under the Act.

Option 2:

The stated costs and benefits of Option 2 are likewise incorrect. In terms of benefits:-

- Satisfy market demand – a more accurate statement is that PC 8 (and 9) would take up a very significant portion of the rural residential allocation to SDC under C1, in two neighbouring locations at south west Rolleston.
- The 71 submissions on the RR Report clearly establish that there is significant interest in rural residential development around all of the townships in the UDS part of the District. Allocating such a significant proportion of rural residential opportunities to one location adjoining one township would not meet the market demand around the other townships, including at Lincoln.
- Provision of a range of residential living options, meeting a diverse range of household needs, lower infrastructure costs and much improved urban design controls resulting in a high quality development and preservation and maintenance of the transition between rural and urban development.

Taking up a significant portion of the rural residential allocation to SDC under C1 in one location adjoining one township will not provide for a range of residential living options, meeting a diverse range of household needs. It will limit the rural residential living opportunity, especially in the first two planning periods, to largely just one township, denying a full range of residential living opportunities to other townships, including Lincoln.

Infrastructure costs will not be lower in the PC8 and PC9 location than at other urban periphery locations around other townships. With respect to our land, there are already existing reticulated sewer and water line servicing both of our Lots 120 and 121 from Allendale Lane. Existing capacity is simply not an issue for the number of lots proposed (8).

Urban design controls, including in relation to the urban/rural boundary can equally apply to other rural residential rezoning proposals. Our rural residential proposal, as outlined in our submission on the RR Report, proposes only 8 rural residential lots, and is not sufficiently large to require integration in accordance with the provisions of an ODP. It is simply a logical extension of the existing rural residential area immediately to the north. Any design features can be dealt with at the subdivision consent stage.

- Facilitate rural residential opportunities consistent with District Plan objectives, provisions of C1 and the RR Report.

The PC 8 & 9 rezoning is not fully consistent with any of the above. In terms of the RR Report, it does not avoid, remedy or mitigate significant reverse sensitivity effects with adjacent established rural activities including intensive farming activities; does not have discernibly logical boundaries determined by strong natural or physical features; and does not limit the number of households within single locations to avoid the collective visual effects of intensified land use.

The costs of Option 2 are 'understated' or not stated. There will be environmental costs related to reverse sensitivity effects, and in particular limitations on the future development and expansion of important Council strategic assets (PWWTP and RRP) and the Dunns Crossing Road Tegel Poultry operation. There will be significant social costs to the wider District as a result of limiting the greatest portion of rural residential living opportunities to one location adjoining just one township.

Option 3:

There is no real analysis of Option 3 as the alternative 'suite of controls' is not specified.

Alternative Options:

The s32 Assessment includes a section 'Possible Locations for Rural Residential Development', limited to 2 ½ pages. It considers only locations adjoining the District's larger townships of Rolleston, Lincoln and Prebbleton.

The assessment concludes that there are limited opportunities at Lincoln and Prebbleton to accommodate rural residential growth, and the PC 8 (and 9) locations meet the C1 criteria. The analysis under 6 Statutory Documents, establishes that PC 8 (and 9) are not entirely consistent with C1.

The analysis of possible locations for rural residential development is entirely inadequate to form the basis for the above conclusions. A conclusion regarding whether or not PC 8 (and 9) are the most appropriate method for providing for sustainable rural residential living opportunities in the District, particularly given the very limited total allocation under C1, must consider alternative locations and the effects of precluding those, given that the PC 8 & 9 proposal will result in significant adverse environmental effects.

The analysis omits to mention our land, located in south Lincoln but to the east of the proposed joint Lincoln University and Ngai Tahu development (the LLD 'Dairy' block). It only refers to land south of the LLD land as being subject to wetness constraints, and land to the east of Lincoln as being constrained by stormwater management issues relating to the Halswell catchment. It considers that land to the north/northeast of the Lincoln Urban Limit as being the most appropriate location for rural residential, but that this area is also perhaps the only location for future residential development.

Clearly, the analysis of possible rural residential locations at Lincoln is inadequate and incomplete because it does not refer to or consider our land, which is entirely suitable for rural residential development, and conversely, not suitable for farming under the current Inner Plains Rural zoning.

8. Relief Sought

We seek that Plan Change 8 is declined in its entirety.

9. Conflict of Interest

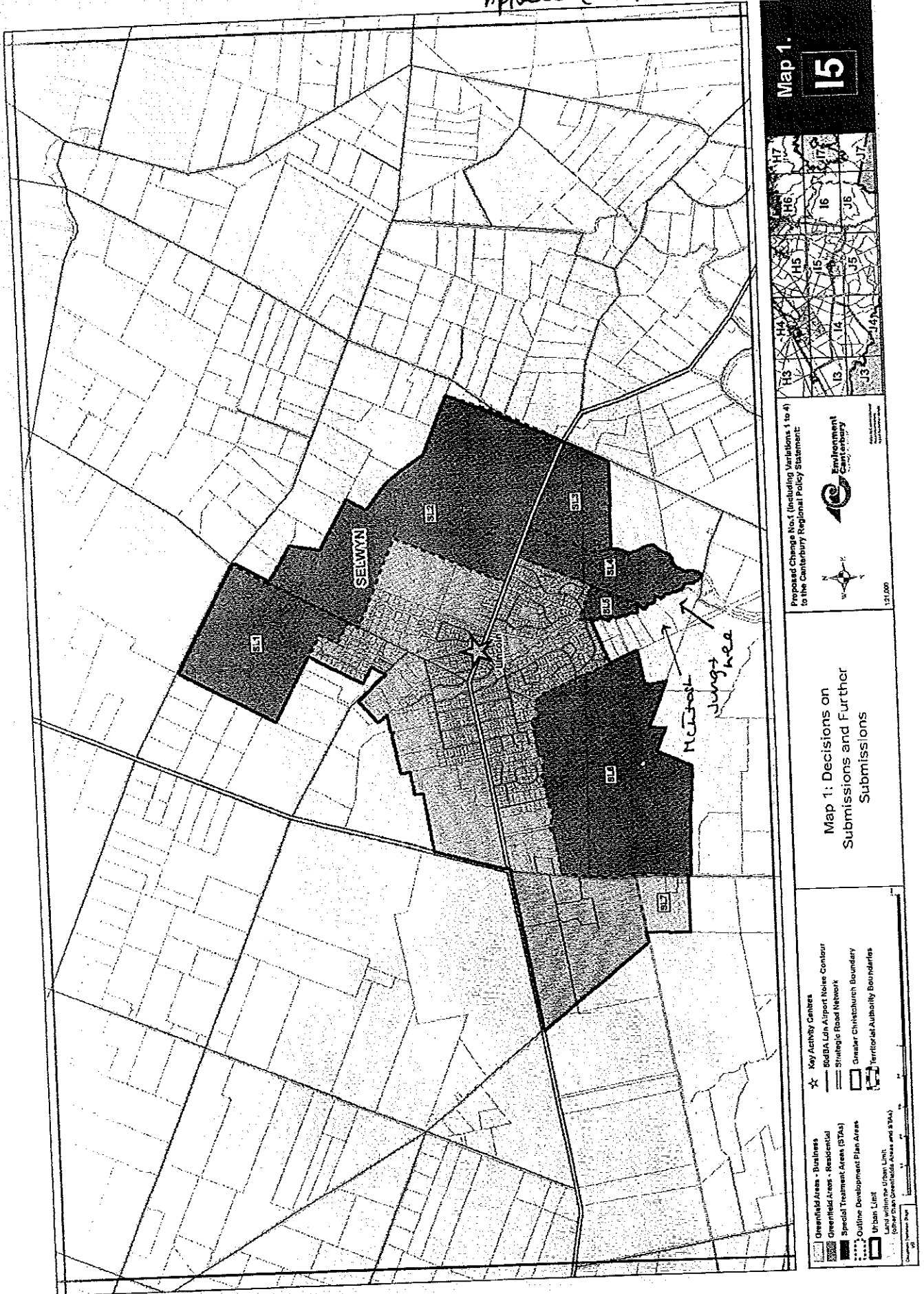
The Council should appoint independent commissioners to hear submissions and further submissions on PC8 because the Selwyn District Council is a significant (majority) shareholder in Selwyn Plantation Board.

We do desire to be heard in support of its submission.

If others are making a submission, we would consider presenting a joint case with them at a hearing.

Signed 200 AAR Date: 21st September 2010

Dr McIntosh, Tung & Lee



Appendix B: Proposed Subdivision

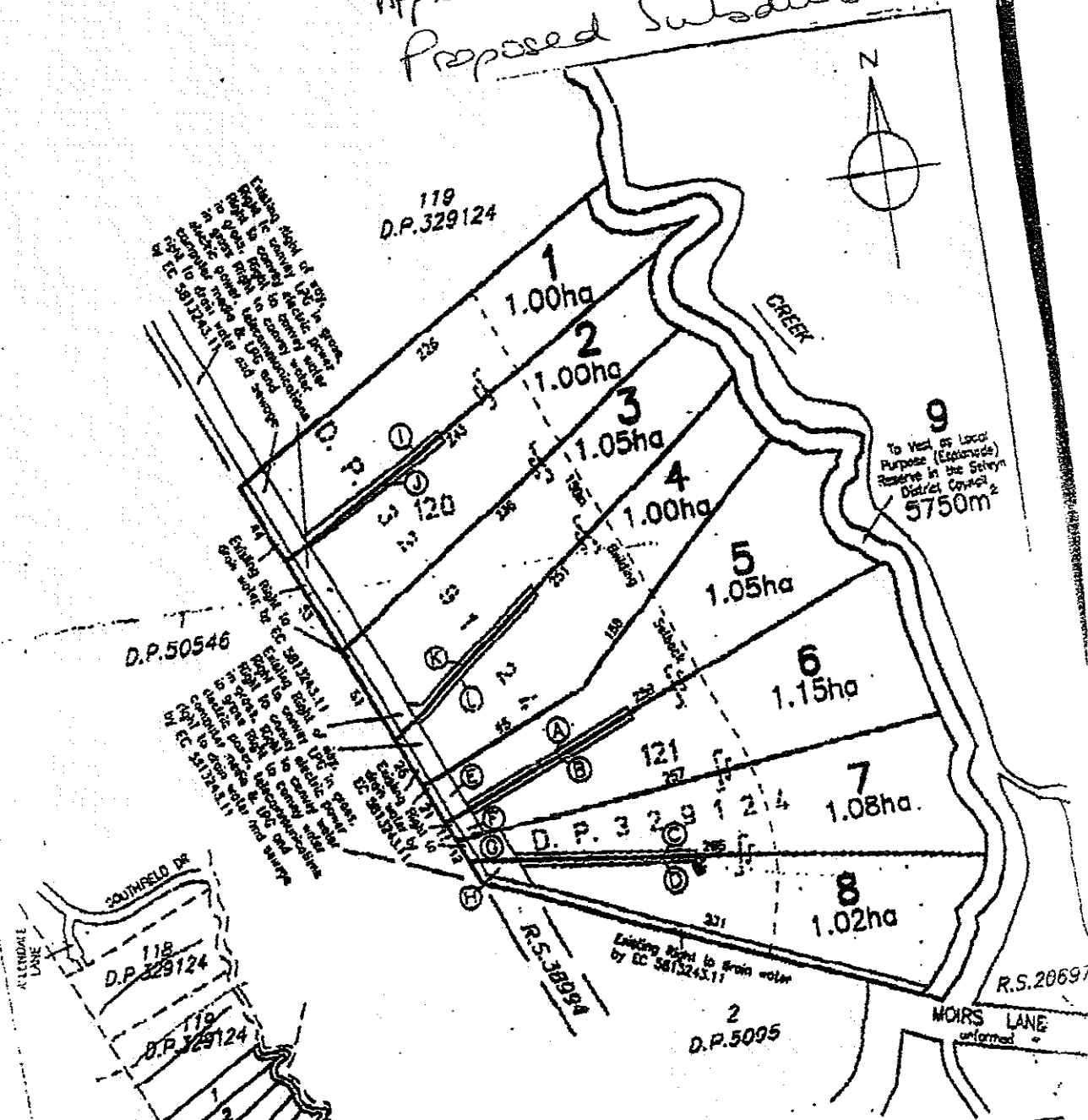


Diagram
Scale 1:12,500

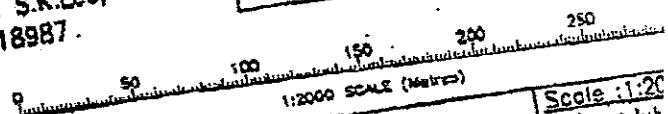
Property Address:
Registered Owners:

Allandale Lane, Lincoln
K.T. & D.J. McIntosh &
M.K. Jang, I.W. Jung, S.K. Lee, M. Sung
C's.T. 118985 & 118987.
Selwyn District
8.9300ha

Comprised in:
Local Authority:
Total Area:

All areas and dimensions are approximate only
and subject to accurate appraisal and final survey.

MEMORANDUM OF EASEMENTS				
Nature	Served Easement		Dominant Easement	
	Lot No.	Shown	Lot No.	Shown
R/W & Servient	1	A	Lot 5	
	2	B	Lot 6	
	3	C	Lot 7	
	4	D	Lot 8	
	5	E	Lot 9	
	6	F	Lot 10	
	7	G	Lot 11	
	8	H	Lot 12	
	9	I	Lot 13	
	10	J	Lot 14	



Proposed Subdivision of
Lots 120 & 121 D.P. 329124

Scale 1:20
Date : Jul
Drawing No
Sheet No

GP
GLASSON POTTS FOWLER
Civil, Commercial & Survey
100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200