



Our ref: PLC:RMgl290426

29 April 2026

The Registrar General
The Office of the Registrar General
McKell Building
2-24 Rawson Place
Sydney NSW 2000

By email: digitalsurveyplans@customerservice.nsw.gov.au

Dear Danusia,

CONSULTATION DRAFT LODGMENT RULES VERSION 2.2

Thank you for the opportunity to provide feedback on the Consultation Draft Lodgment Rules Version 2.2 (**Draft Lodgment Rules**). The Law Society's Property Law Committee contributed to this submission.

We note the purpose of the revised Draft Lodgment Rules is to make further provision for the transition to 100% digital survey plans. Of particular importance to solicitors is that from 1 July 2026, subject to limited exceptions, administration sheets and section 88B instruments accompanying plans must be prepared and lodged through the dedicated portal, LRS Connect, developed by NSW Land Registry Services (**LRS**). We generally support the Draft Lodgment Rules and the transition to 100% digital survey plans.

The Draft Lodgment Rules make a distinction as to the different methods of making an alteration to an administration sheet, 88B instrument or other dealing or instrument, depending upon whether it is a "minor alteration" or a "major alteration". For example, Item 5, Schedule 8 "Requirements for administration sheet lodged with deposited plans" states:

For forms prepared as required by Rule 7.2.1 and downloaded from NSW LRS Connect:

- major alterations must be made directly in NSW LRS Connect, and the altered form then re-downloaded as a PDF for execution
- minor alterations may be made by striking through the matter intended to be altered or by interlineation and then verified by the parties to the instrument...

Similarly, the distinction between a "major alteration" or "minor alteration", is also found in:

- Schedule 9 "Requirements for section 88B instruments", item 6.
- Schedule 13 "Requirements for administration sheet lodged with strata plans", item 4.
- Schedule 17 "Requirements for making alterations to dealings, caveats and instruments lodged in electronic form in the Torrens Register", item 2.

We suggest that guidance should be provided in relation to what should be regarded as a "major" or "minor alteration", and such guidance should include a number of supporting examples. This guidance could be included

in the Draft Lodgment Rules, or if provided elsewhere, could be cross referenced in the Draft Lodgment Rules. We would be pleased to liaise further with you in relation to the content of such guidance. In our view, provision of such guidance will be important in minimising potential requisitions, for example, if a practitioner regards an alteration as minor, but LRS regards it as major, and therefore requisitions that the alteration be remade in NSW LRS Connect, downloaded and re-executed. Appropriate guidance will assist in reducing delays and costs for our members' clients, and improve timely registration through LRS Connect.

Any questions in relation to this letter should be directed to Gabrielle Lea, Senior Policy Lawyer, at gabrielle.lea@lawsociety.com.au or on (02) 9926 0375.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ronan MacSweeney', written in a cursive style.

Ronan MacSweeney
President