

**Before Independent Hearing Commissioners appointed by Wellington
City Council**

In the matter of the Resource Management Act 1991 (**RMA**)

And

In the matter of hearing of submissions on the Proposed Wellington City District
Plan

Between

**Argosy Property No 1 Limited, Fabric Property Limited,
Oyster Management Limited and Precinct Properties New
Zealand Limited**

and

Wellington City Council

Statement of Urban Design evidence of Cameron Wallace on
behalf of Argosy Property No 1 Limited (submitter 383), Fabric
Property Limited (submitter 425), Oyster Management Limited
(submitter 404) and Precinct Properties New Zealand Limited
(submitter 139)

Hearing Stream 4 – City Centre Zone and Waterfront Zone

Dated 12 June 2023

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MAY IT PLEASE THE COMMISSIONERS

INTRODUCTION

1. My full name is Cameron Wallace. I am a Partner and Urban Designer at Barker & Associates (**B&A**), an independent, specialist urban and environmental planning consultancy.
2. I have been engaged by Argosy Property No 1 Limited (**Argosy**), Fabric Property Limited (**Fabric**), Oyster Management Limited (**Oyster**), and Precinct Properties New Zealand Limited (**Precinct**) to provide expert evidence on behalf of all four office companies, who have made submissions on the Proposed Wellington City District Plan (**Proposed Plan**). In this Centres hearing, my evidence refers to the Design Guide, City Centre Zone (**CCZ**) and Waterfront Zone (**WFZ**) Chapters of the Proposed Plan.
3. I hold a Master of Urban Design (1st Class Honours) and a Bachelor of Planning (1st Class Honours) from the University of Auckland. I have been a Full Member of the New Zealand Planning Institute since 2014 and am a Member of the NZ Urban Design Forum.
4. I have 15 years' professional experience working in urban design and urban planning, gained in both the public and private sector, in the United Kingdom and New Zealand. Since 2018, I have been employed as an urban designer at B&A. In my current role, I regularly assist local authorities and government departments with policy and district plan development in relation to growth management and urban design matters. I also provide up-front urban design input into a wide range of development schemes for private clients, including multi-unit residential and commercial buildings in centre environments. This includes regular attendance before urban design panels.
5. Prior to my employment at B&A, I worked for over 3 years as a City Planner, then Principal City Planner, at Transport for London where I assisted in the development of planning frameworks to support large-scale brownfield regeneration and growth in "Opportunity Areas" across Greater London.

6. Of particular relevance to the matters that will be covered in my evidence, I am or have been a member of urban design and planning teams for policy planning and development projects including:
- (a) Private Plan Change 48 – Drury Central to the Auckland Unitary Plan, specifically acting as urban design lead in the proposal to rezone 91 hectares of land in South Auckland from ‘Future Urban’ to ‘Business – Metropolitan Centre’, ‘Business – Mixed Use’ and ‘Open Space – Informal Recreation’ zones;
 - (b) Plan Change 9 – Rotorua District Plan, specifically acting as lead urban designer advising Rotorua Lakes Council on development of a new High Density Residential Zone, amendments to the City Centre zone to give effect to Policy 5 of the National Policy Statement on Urban Development 2020 (**NPS-UD**) and the development of supporting non-statutory urban design guidelines;
 - (c) Queenstown Lakes Proposed District Plan Review, specifically ongoing provision of spatial analysis to inform an urban design review of existing provisions (with a focus on height and density of development) across all residential and commercial zones to ensure alignment with Policy 1 and Policy 5 of the NPS-UD; and
 - (d) Urban design reviews, specifically acting as a consultant urban designer on a range of resource consent applications for both private developers and Auckland Council for new developments within the Auckland City Centre Zone. This has included regular presentations and attendance in front of the Auckland Urban Design Panel.

CODE OF CONDUCT

7. I have read and am familiar with the Environment Court’s Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE

8. My evidence will cover the following areas of the Proposed Plan:
 - (a) Permitted building heights in the CCZ;
 - (b) Active frontage, minimum ground floor height, building separation, building depth and outlook standards in the CCZ;
 - (c) The City Outcomes Contributions policy / framework; and
 - (d) Building heights in the Waterfront Zone.
9. In preparing my evidence, I have reviewed:
 - (a) The Proposed Plan.
 - (b) The accompanying s32 report;
 - (c) The s42A report covering the CCZ;
 - (d) The s42A report covering the overview and general matters for commercial and mixed-use zones;
 - (e) Planning evidence of Joe Jeffries;
 - (f) Urban Design evidence of Dr Farzad Zamani; and
 - (g) Economic evidence of Kirdan Lees.
10. This statement of evidence should be read in conjunction with my statement of evidence prepared in support of Stride and Investore's submissions on the Metropolitan Centre Zone (**MCZ**).

CITY CENTRE ZONE

11. The Precinct, Fabric, Oyster, and Argosy (the submitters) submissions support the Proposed Plan in part, particularly to the extent that it enables well-functioning urban environments in accordance with objective 1 of the NPS-UD. The submitters seek a number of amendments to the Proposed Plan to better give effect to the NPS-UD.

Building Height

12. The Fabric and Precinct submissions seek amendments to CCZ-S1 to provide unlimited building heights. The Oyster submission seeks amendment of CCZ-S1 as it applies to 141 The Terrace and 294 and 298 Lambton Quay to provide a 90m building height. The Argosy submission seeks for the height limit of 7 Waterloo Quay be increased to 60m.
13. The reporting officer accepts all submission points seeking unlimited building heights and recommends amending CCZ-S1 accordingly. This would effectively mean greater heights than those sought by Oyster and Argosy in relation to 141 The Terrace, 294 and 298 Lambton Quay and 7 Waterloo Quay.
14. I support the recommendation to remove building height limits within the CCZ and the reporting officer's rationale – in particular in the area around Thorndon / Lambton Quay. There are a number of benefits associated with increased commercial and residential densities enabled through greater building height such as reduced infrastructure costs, more affordable housing, increased vibrancy / vitality of centres due to a greater concentration of people within them, and reduced reliance on private vehicle use. These benefits are more widely set out within the s42A report, and the evidence of Dr Zamani and Kirdan Lees on behalf of Council. In design terms, the removal of height limits allows for more design flexibility with a greater focus on the overall building design and quality, and subsequently encouraging greater variety in design responses without the need to "squeeze in" the necessary floor area to support overall feasibility.
15. I note that new buildings will still be subject to a design review and assessment process under CCZ-R20. This will enable appropriate consideration of the design of taller buildings and would include achieving quality design outcomes and managing the adverse effects of taller buildings over and above the permitted heights set out within the Proposed Plan as notified.
16. In addition, I note the new provision CCZ-M1 which notes that Council is seeking to establish and facilitate an independent Urban Design Panel to help inform urban design assessments for significant resource consent applications. It is likely that tall buildings within the CCZ would be captured

by such a Panel if it is to be established. I have been involved in numerous urban design panel processes in Auckland for buildings at a range of scales and have generally found the process to be useful despite costs associated with engaging in such a process.

17. Further, I note that while Council has recommended the adoption of unlimited building heights, the retention of height thresholds (aligned with the previous permitted building heights) as part of the City Outcomes Contributions framework creates a potential barrier for greater heights to be realised. I discuss this issue further in paragraphs 35 to 47 of my evidence.

Minimum Ground Floor Height (CCZ-S5)

18. Both the Fabric and Precinct submissions oppose the minimum ground floor height standard and seek its deletion, on the basis that it may be appropriate to provide ground floor heights lower than 4 metres in certain areas and that the standard as notified is unnecessarily constraining. I support this point in part.
19. The s42A report disagrees with the Fabric and Precinct submissions noting that the 4m building height is important for ensuring flexibility in ground floor uses over the lifetime of a building, noting that higher floor-to-floor heights are often required to accommodate features such as services and false ceilings as part of a commercial fit out. Supporting commercial and retail uses at ground floor level is also important to attract and maintain pedestrian flows to support centre vibrancy. I agree with the s42A author on these matters.
20. However, there are a number of situations where the blanket provision of a 4m height may not be necessary or desirable within the context of a large commercial or mixed-use development such as “back-of-house” service areas or where a mezzanine level is incorporated into an overall more spacious ground level. In my opinion, the requirement for minimum ground floor heights would be more appropriately limited to a defined distance of 10m adjacent to public streets and open spaces. This would ensure that public facing areas of the building retain overall flexibility for a range of uses, including retail tenancies, and a sense of spaciousness from the street whilst sleeving any back-of-house building functions (out of public view / access) where lesser building heights may be more appropriate. In some cases, I

acknowledge that the practical needs of the structure and internal floor levels would result in the minimum required floor height being continued for more than the proposed depth, but the control should be limited to the area which is important to address so that design flexibility is not unduly restricted.

Active Frontage Control (CCZ-S8)

21. Fabric, Oyster, Argosy and Precinct seek amendments to CCZ-S8 to provide exceptions to the requirement to build up to the street edge along the full width of the site. Fabric, Oyster, and Argosy seek exclusions for open space, vehicle and pedestrian access. Precinct seeks amendments to the standard so that only 70% of an active frontage must be built up to the street edge, in order to allow for functional requirements on the remaining 30% of the street frontage.
22. I am generally supportive of the intent and rationale of these submissions. Subsequent amendments proposed by Council include clarification of its application only to those boundaries identified with an active frontage and exclusions for pedestrian and vehicle access. I support these proposed amendments and consider that they partially address the relief sought by Fabric, Oyster, Argosy and Precinct.
23. However, there remains other circumstances where not building out to the street boundary within the City Centre is appropriate. Examples would include the creation of a small plaza space / recess outside of a building entrance, areas designed to accommodate outdoor dining / furniture (so as to keep the adjacent footpath clear for movement and promote activity at the street edge) or to provide a chamfer to a building edge at a corner site to improve visibility / respond to its corner location. In this regard, I consider some flexibility within the provisions would still be appropriate and beneficial to support such circumstances. As such, I would recommend a threshold of 90% be included. I also support the proposed amendment to the assessment criteria to include circumstances that otherwise “enhance the streetscape”. I consider a design proposal which incorporates the example features identified would likely fit within such a criterion.
24. In addition, the standard would benefit with an amendment to clarify that the requirement to build out to the boundary only applies to those parts of the building subject to the minimum building height standard (22m). This

provides flexibility for buildings to be set-back at upper floors as these parts of a building are unrelated to the intent and rationale of the standard. As the rule currently stands, a podium / tower building configuration would trigger an additional consent requirement. This type of building configuration is not uncommon in a city centre environment and should not be unnecessarily restricted.

Building Depth (CCZ-S11), Building Separation (CCZ-S12) and Outlook (CCZ-S13)

25. Both Fabric and Precinct sought deletion of the building depth standard. The s42A report author disagrees and discusses the rationale around the building depth standard with reference to its combination with the building separation standard. Whilst my clients had no specific submission points with relation to the building separation standard, the justification for supporting the building depth standard appears intertwined with building separation. I appreciate some of the stated rationale and intent of these rules, but it is my opinion that as an overall package they are poorly targeted and may in fact promote poor urban design outcomes and unnecessarily undermine the delivery of appropriately designed commercial developments within the City Centre. As such, I support their deletion in their entirety. However, I also consider that the intent of these rules would be better supported by a consequential change to the outlook controls as the issues are primarily related to effect on/from residential activities. I note this position is consistent with my evidence on behalf of Stride Investment Management Limited and Investore Property Limited on the Metropolitan Centre zone.
26. The building depth standard is intended to “encourage the buildings to be placed at the front of the site and prevent long buildings into the site, facing the neighbours. This will ensure most living spaces are either facing the street or the communal courtyards. It also prevents having blank walls along the street edge.”¹ Paragraph 695 of the s42A report also states that the standard “contributes to privacy and averting overdominance by preventing buildings overlooking each other and enables improved sunlight access into the centre of sites.”

¹ Paragraph 36, Evidence in Chief of Dr Zamani.

27. I have a number of concerns with the rationale advanced by Council as to the purpose of these rules as they relate to a City Centre environment. I also note that in the s 42a report the building depth standard has been proposed to be amended to apply only to buildings with a residential activity within the revised provisions of the MCZ. This anticipates that larger / longer commercial buildings in a centre environment are appropriate. It is not clear why the Council officer considers that commercial buildings within the CCZ need to be smaller than in the MCZ.
28. In terms of the practical issues with the building depth standard, first I note that it is not clear how a building depth standard encourages “buildings to be placed at the front of a site”. It in no way regulates such an outcome. However, I do note that the current wording of the active frontage standard (CCZ-8) does require the front façade of the building to be built to the street boundary for the building’s entire height.
29. Secondly, it will not prevent “long buildings, facing into the neighbours” for the following reasons:
- (a) First, although the rule references building depth, it relies on measurements of a “building wall” – these are not necessarily the same thing and a small recess / modulation in a building elevation would create a new wall from which measurements would be assessed. For example, a building could include multiple walls, each with a length of less than 25m, but with a total building depth exceeding 25m. In other words, the depth of a building (and its ultimate massing and scale) can be the product of multiple walls along a single elevation. It is also note clear how this rule would be applied or assessed in the event a developer seeks to include rounded building in the shape of a circle or oval, or alternatively featuring a curved wall.
 - (b) The second factor is the minimal requirements for outlook space of 1m that apply to all habitable rooms under Standard CCZ-S13. In my opinion, the limited extent of the outlook control encourages buildings to orientate over side boundaries to maximise yield potential and creates a real risk of future dwellings’ light / outlook being built out should neighbouring sites develop in the future. This sets up a

scenario where two residential units on adjoining sites could be positioned and orientated to one another with a separation distance of 8m and be compliant with the relevant development standards. In my opinion, this undermines the central purpose of the rule. I also note that similar scenarios occurred in Auckland City Centre in the early 2000s and this was subsequently a key driver for the development of outlook controls in the then Central Area Plan.

30. Thirdly, the control does not reflect the realities of commercial development within the City Centre and typical floor plans for office development. A quick review of existing building depths across the Thorndon area indicates common building depths of commercial office building are generally in excess of 30m. For context, examples of buildings which would infringe the building depth control include:
- (a) The Deloitte Building, Customhouse Quay – building depth of ca. 51m;
 - (b) The NTT Tower, Lambton Quay – building depth of ca. 52m;
 - (c) RBNZ Building, The Terrace – building depth of ca. 59m; and
 - (d) Charles Ferguson Building, Bowen Street – building depth of ca. 37m.
31. With regard to the building separation control, this is proposed to be applied to all buildings that include a residential activity. As these will fall within a centre zone there is an expectation that at least the ground floor of buildings will contain a commercial or retail component, and residential activities would be provided above ground floor level. The ground floor, which may be solely for commercial uses (as well as upper levels which may be for non-residential uses), will have to comply with the building separation control (within the same site). On larger sites where some buildings may be retained, this could lead to an inefficient use of developable land.
32. Compounding this issue is that a new building could be sought on larger sites where the building separation control may result in a requirement for an 8m separation at ground floor to the parallel to the street edge. Where this faces an identified active frontage, it would trigger consent requirements for infringement to this rule which requires 100% of the boundary to be built up

- to the street frontage – in other words the CCZ framework sets up a realistic situation where compliance with one standard inevitably triggers non-compliance with another standard. I consider this to be highly problematic. Further, as this standard only applies to buildings within the same site it is likely to encourage development to locate towards side boundaries in proximity to taller buildings on neighbouring sites.
33. In my opinion, a more effective and appropriate control would be to delete both the building separation and building depth standards and consequentially amend the outlook standard to increase the required depth to 6m from the principal living area of a residential unit which must be accommodated within the site boundaries or over a street / rail corridor / open space. This is a well-established approach and is used within centre zones under the Auckland Unitary Plan. The 6m depth would encourage development to maximise outlook over the street to better promote passive surveillance down onto the street and privacy from building residents. Where a developer opts to orientate living spaces towards side boundaries, a 6m separation from the boundary ensures a minimum degree of privacy / light and outlook can be maintained in the event a neighbouring site is built out by a commercial development built to the boundary.
34. Increasing the required outlook space to 6m may also have the potential for other added benefits including increased sunlight access between buildings and down to streets and reductions in wind tunnel effects. A further benefit of the above approach is that it also avoids potential impacts / lost development opportunities for commercial / retail at lower levels of a development as it only applies to the residential component of a building rather than the entire building. In my opinion, this approach is a more appropriate method to achieve appropriate levels of on-site and off-site amenity within the context of a centre environment. It better acknowledges that both higher density residential and commercial uses are sought, often together, but have fundamentally different design drivers.

CITY OUTCOMES CONTRIBUTIONS

35. The Fabric, Argosy, and Precinct submissions all oppose the City Outcomes Contributions and seek their deletion. Fabric, Argosy, and Precinct also seek

- the deletion of CCZ-P11 which provides the overriding policy on the City Outcomes Contribution.
36. Paragraph 27 of Dr Zamani's evidence in chief notes that the City Outcomes Contribution (**COC**) replaces the Design Excellence policy in the Operative District Plan (policy 12.2.2.5) which was considered to be complex and vague. This led to assessments of design excellence that "were in many cases dependent on the subjective interpretation of the urban design advisor assessing a resource consent application." The proposed contribution / scoring framework was developed in an attempt to avoid this problem by providing clear and measurable indicators.
 37. Based on my reading of the COC and subsequent changes recommended within the s42A report, I am of the opinion that the method remains complex, is uncertain and retains a high degree of subjectivity that it was supposedly intended to remove. The key difference from the Design Excellence policy seems to be that Council are seeking to apply a subjective numerical scoring framework on top of a subjective design assessment. Contrary to Dr Zamani's position, I find it difficult to understand how the COC framework provides any clear or measurable assistance to developers or designers and how these would be managed through the consent process from pre-application through to a decision.
 38. Within the revised matters contained within the COC, I have concerns over the practicality of a number of outcomes identified and the upfront costs required to assess these whilst being uncertain of the eventual grant of consent for an over height development. In my experience, consideration of a resource consent application for a development that exceeds the permitted height limit usually turns principally on issues around visual effects, and off-site amenity effects (e.g. shading). In this regard I am not clear how the provision of a public toilet helps mitigate the additional shading of a public open space from a very tall building.
 39. The new Appendix 16 states that tall buildings "have the potential to impact on the quality and level of public and private amenity within the City's commercial centres and securing additional benefits from these developments is therefore required." This contrasts with the urban design evidence of Dr Zamani on behalf of Council who notes in Paragraph 41 of his

evidence that “the increase in height by itself does not lead to negative outcomes. In contrary, increased height can have more public amenity benefits.”

40. There is also no clarity as to the actual process of how the COCs would apply and be assessed. Obvious questions include:
- (a) Would an indicative score be provided as part of a pre-application process? How detailed would the design need to be to receive an indicative score?
 - (b) If an applicant applies for an over height development of greater than 50% in the CCZ confident they will score the required 40 points, but Council assigns a score 35, does the application get declined?
 - (c) Which proposal is more appropriate – an application for an over height development by 48% (of the nominated height threshold) which provides 30 points and therefore complies with the COC or an over height development by 50% (of the nominated height threshold) that provides 38 points and therefore does not comply with the COC?
41. My further concerns with the COCs are that the other positive effects of more intensive development seem to be given little regard or are deemed irrelevant. These include those matters identified in Paragraph 14 of my evidence. The proposed framework appears to raise a situation where the provision of more housing within centres, resulting in lower carbon lifestyles, improved access to services / amenities and the increased vitality of centres is of secondary importance to designing a building to achieve prescribed outcomes that are not directly related to the building’s effects.
42. With regard to the contributions themselves, some of the contributions require the preparation of detailed information that is usually provided as part of the later building consent process (e.g. building systems, structural design). In my experience, such matters are often not significantly advanced as part of the design process for a resource consent application due to the uncertainty of not having a consent as well as the need for flexibility to respond to the design review process and/or any s92 requests or suggested amendments to the design of a development. It is not uncommon for significant design changes to occur as a result of discussions with Council

- which could have a material impact on a range of detailed design matters requiring substantial rework at additional time and cost.
43. I also have concerns with the inclusion of “any lane-way or through block connection”. This implies that this can only be a positive outcome. In my opinion, there is the potential that through-block connections could give rise to poor urban design outcomes. This would include situations where through block connections do not respond to any obvious desire lines between key destinations or activity generators, or alternatively they could make an area too permeable and reduce the concentration of pedestrian footfall and undermine retail activity.
 44. Overall, while I agree with the principle of many of the outcomes identified, I am of the opinion that it would be more appropriate to consider the merit of these (where they are provided) as part of an overall design assessment and to remove a specific requirement to comply or deliver the COCs.
 45. In terms of its application, if the Panel is minded to retain the COC framework, I would consider further refinements to the height thresholds and their application would be necessary.
 46. The proposed permitted height levels within the Proposed Plan have been retained for instances where the COCs would apply. In my opinion these are unnecessarily complicated and were developed for the specific purpose of restricting height within parts of the City Centre. The result is that they create real issues, particularly at the edge of the height control areas, that undermine their appropriateness. For example, take two buildings adjacent to one another and fronting Ghuznee Street (90 Ghuznee Street and 172 Victoria Street) both built to 43.8m in height with identical designs. However, 90 Ghuznee Street falls within Height Control Area 7 (threshold of 43.8m) and the other within Height Control Area 8 (threshold of 42.5m) would be subject to different consent processes and potential costs of development despite ostensibly having near identical effects (both positive and adverse). At face value, such an issue represents a clear example of where the proposed COC framework would not contribute to a “well-functioning urban environment” - specifically the requirement to support the competitive operation in land and development markets.

47. In my opinion, if any height thresholds are to remain these need to be reset based on two key factors:
- (a) The thresholds for the CCZ should be greater than all applicable thresholds that are proposed to apply to the Metropolitan Centre Zones (i.e. at least 35m reflecting the current threshold for Johnsonville²). Given the importance and function of the CCZ relative to the MCZ's, development should not generally be less enabling; and
 - (b) As stated in the s42A report, City Centre height limits within the Operative District Plan (which are partially reflected in the height thresholds in the Proposed Plan) were derived from a 1984 study produced under a vastly different regulatory framework and an era with different development drivers. Rather, any thresholds and the areas to which they apply must be aligned with overall levels of accessibility and demand to align with Objective 3 and Policy 3(a) of NPS-UD which is intended to realise as much development capacity as possible. In this instance an inner-city threshold focused around the rail station / Lambton Quay / Willis Street areas of approximately 95m and outer city threshold covering the balance of the CCZ of 50m could be a simpler and more appropriate solution.

WATERFRONT ZONE

48. The Proposed Plan maps show that the maximum height for the Meridian Building site is 17.7m. Fabric seeks a building height of at least 23.1m (to align with the adjacent PWC building) for the Meridian Building site to enable an additional floor to be added. I understand that Fabric is seeking an increase in height at this site to help improve the viability of the works required to the building for earthquake strengthening.
49. Whilst sympathising with Fabric's reasons for their submissions, the reporting officer rejects this submission point.

² Several submissions have sought increased height limits for Johnsonville, including those of Stride and Investore for which I have also prepared evidence. If these submissions are accepted, I would expect a natural increase in the height thresholds applying to the CCZ to ensure consistency.

50. I have no concerns with the Fabric proposal on urban design grounds and note that a resource consent process would still be required to increase the height of that building. In my opinion, the increased height proposed, which is consistent with adjacent buildings (in line with the matters identified in WFZ-P6) and considerably smaller in scale than new development along Customhouse Quay, provides greater certainty that Fabric can proceed through a design process for an additional storey of development to support the feasibility of earthquake strengthening. From an urban design perspective, the more critical concern is that the current building remains vacant and cannot contribute to the creation of a vibrant and safe waterfront area consistent with WFZ-O6 and WFZ-P4. In my opinion, given the nature of existing buildings within the WFZ, reducing barriers to the ongoing use of existing buildings and activation of the WFZ is the more important issue with which the Proposed Plan can help address.

CONCLUSION

51. In conclusion, I am supportive of the submissions of Precinct, Fabric, Oyster, and Argosy as they relate to urban design matters within the CCZ and WFZ. I consider that further amendments to the Proposed Plan, as set out in Appendix 1 of the evidence of Mr Jeffries, are required to better enable positive urban design outcomes and give effect to the intensification objectives and policies of the NPS-UD as well as the purpose and principles of the Resource Management Act 1991.

DATED at Auckland this 12 June 2023



Cameron Wallace