

*Tabled Information
Development Contributions
Subcommittee
Reference 015/10DC(a)*

**WELLINGTON CITY COUNCIL
DEVELOPMENT CONTRIBUTION
VOGEL CAMPUS**

IN THE MATTER

of the Local Government Act 2002

AND

IN THE MATTER

Of an application for remission of the standard development contribution on Building Consent SR162022 for the Vogel Campus development on the property known as 16 Kate Sheppard Place and 7-17 Mulgrave Street

BY

**CAPITAL PROPERTIES
(WELLINGTON) LIMITED**

Applicant

**FURTHER SUBMISSION OF MR J D LYNCH IN SUPPORT OF
APPLICATION FOR REMISSION OF
THE STANDARD DEVELOPMENT CONTRIBUTION**

Introduction

1. This submission is;
 - (a) Further to my submission 17th March 2010 in support of the application by Capital Properties (Wellington) Limited ("Capital Properties"), and;
 - (b) In response to the officers' Report 1 dated 21st April that there be full remission of the stormwater component of the development contribution being \$52,533.20 only.
2. The statute allows development contributions to be claimed only if there is a real basis for them. They cannot be imposed simply as an additional tax. If the

Council does so it can be challenged in the Courts. The Council's Policy and its implementation of it must be consistent with this principle.

3. Investment in the City results in the Council collecting increased rates to maintain existing infrastructure so new investment should be encouraged.

4.3 Purpose and Effect of Development Contribution Fees

4. The development contribution requirements are based on the best information available at the time on projected growth. However, they recognise that not all situations can be predicted by reserving to Council a very broad discretion to remit contributions.

Officers' Report 1; 4.4 Notification and Approval of Resource Consent Application

5. The officers argue that the development forgone around the *Thistle Inn* was required under the Central Area Design Guide for urban design reasons so it was not a voluntary contribution to protect the Cities built heritage in the form of the *Thistle Inn*.
6. That is incorrect; the CADG could not have been used to require the extent of the development forgone.
7. The District Plan provided for 100% site coverage up to the permitted height. It encouraged this form of development so development was right across a site to a consistent height. The 100% site coverage and permitted height provisions established the permitted bulk of a building.
8. The CADG by contrast is only a guideline. It could not have been used to contradict in a fundamental way the basic right to 100% site coverage up to the permitted height.
9. The CADG is a *design* guideline. It is used to influence the design of the façade, incorporate design features, control colours and materials, etc, in the context of both the building itself and its surrounding environment. The CADG cannot be

used to substantially reduce the bulk of the building which is controlled by the 100% site coverage and permitted height provisions.

10. There was no doubt in anyone's mind at the time that the development was being forgone to protect a valuable heritage building and not for urban design reasons. Capital Properties would not have foregone the development rights for any small building; it did it because the *Thistle* is important to the City.
11. Since the Plan prior to DPC 48 did not allow effects on heritage to be taken into account Capital Properties decision in consultation with the Council to forgo a substantial area of development around the *Thistle Inn* was a voluntary and valuable contribution to the Cities built heritage. It should be recognised as such.

Officers Report; 4.5 Loss of Airspace

12. Mr Robinson will present information on the value of the development rights forgone which is the value of the contribution by Capital Properties to protect the *Thistle Inn*.

Stormwater

13. The development will not result in any new expenditure for stormwater so the officers have recommended correctly that the development contribution required for it be remitted in full.

Officers' Report; 4.6 Roading and Transport

14. Contrary to the statement in the officers' report, there will not be a significant increase in traffic generated by this development. There were 108 carparks on the site previously and there are 130 in the development. The levy claimed is \$192,003.71 which is nearly \$9,000.00 for each of the 22 additional carparks. The addition of 22 carparks is negligible in the context of the traffic in the area so there is no basis for imposing a development contribution on the premise that the Vogel Campus will result in the need for additional roading expenditure. It will

not. The Vogel Campus will make a substantial contribution to the maintenance of the roading network as a result of the rates on the property being increased by the value of the development.

15. Capital Properties developed the Defence Building. The number of carparks on the site was reduced from 70 to 60. The Council did not give any credit for the reduction. It should at least take that reduction into account if it wishes to impose a roading contribution. It would be inconsistent not to do so.
16. Also the officers' have overlooked provision by Capital Properties of the pedestrian link through the building. This has been provided at the cost of Capital Properties and it is a public benefit. It would not normally be provided in a commercial office building so it represents a contribution to create a public amenity which should be taken into account. No reason is given in Report 1 for not taking this public benefit into account.

Officers' Report 4.6 Reserves

17. It is incorrect to say the development will result in additional expenditure on reserves. That has not happened and it will not. A contribution cannot be levied for an expense which has not and will not be incurred.
18. The Vogel Campus development will make a substantial contribution to maintenance of the City's reserves through increased rates.
19. Again in this context the officers have omitted to make any allowance for the cost to Capital Properties of creating the Aitkin Link for the public at the request of the Council's urban designer.

Officers' Report; 4.7 Positive Contribution to Built Heritage

20. The officers say the outcome for the *Thistle Inn* was desirable but this issue is not related to development contributions.

21. The Council's duty is to provide for integrated management of resources. It does so under various statutes, including the LGA and the RMA. The policies under the different statutes must work harmoniously in an integrated manner. None of the policies should be applied on a stand-alone basis which may lead to policies contradicting each other.
22. The Council has a *Development Contribution Policy* and a *Built Heritage Policy*. They should be applied in an integrated manner to achieve an overall result.
23. Capital Properties, NZHPT and the Council agree that the *Thistle Inn* is an exceptional heritage building. Contributions made to protect such a valuable building constitute an exceptional circumstance under the *Development Contribution Policy*. The public benefits are very real.

Officers' Report; 4.8 Waterloo Decision

24. The relevant point in the decision was that under the Plan prior to DPC 48 a development did not have to take into account effects on adjacent heritage buildings. DPC 48 now requires such effects to be taken into account.

Conclusion

25. The Council should take into account that it is competing for investment with other cities not only in New Zealand but also in Australia. It should encourage investment in Wellington by treating investors fairly.
26. There is a surplus of office space. It is very difficult to get funding for developments. It is in the City's best interests to encourage development to maintain a stock of high quality modern or renewed buildings. The City should be actively creating an environment which encourages investment in the City.
27. The development contribution requirements if applied in a rigid manner will impede investment in the City. They should be applied in a manner which encourages good development which makes a real contribution to the City.

28. In this case Capital Properties in consultation with the Council made expensive contributions to protect the *Thistle Inn* and it is fair that they should be recognised in a meaningful way. Capital Properties has been more than fair by saying 50% should be remitted so the expense incurred should be shared 50/50 with the Council in recognition of the public benefit achieved.

DATED 14th May 2010.

J D Lynch

14 May 2010

Wellington City Council
Development Contributions Subcommittee
PO Box 2199
WELLINGTON

Dear Garry,

Re: Further supporting information in relation to the Application for remission of Development Contributions – Vogel Centre

Thank you for your letter dated 23 April 2010 confirming the adjournment of the Development Contribution Subcommittee meeting of 21 April 2010 to 19 May 2010.

As discussed with you, we now attach our further submission in support of our application for the remission of development contributions for stage 1 of the Vogel Centre.

Our further supporting submission includes:

1. Mr. Lynch's formal response to the WCC officers' review of our original application and supporting submission, provided to the subcommittee meeting on 17 March 2010.
2. Our further calculation on the issue of "development foregone" which has been the subject of much discussion at the previous meetings. I have added emails from Andrew Washington (Valuer Colliers Valuation) and Hugh Mackenzie (recently retired MD at Rider Levett Bucknall Cost Surveyors) to substantiate the value.
3. Our further revision of the remission amount requested by Capital Properties as a consequence of the further calculation in item 2.
4. Copy of Chris Gudgeon letter to Garry Poole regarding the resource consent application process and required "approval of neighbours". The impact of this late change by the WCC was a six month delay the project that cost CPNZ in excess of a \$1 million.

2. "Cost of Development Foregone"

"Development Foregone" represents the lost value to the Owner by the voluntary reduction in the bulk of the building around the Thistle Inn.

- a) Area lost is a total of 180 sq.m. Net Lettable Area or 207 sqm Gross Floor Area.
- b) Using the actual agreed (with Justice and ACC) net rentals for the levels where floor area was reduced, the annual net rental loss is \$62,700 plus GST.
- c) There are various methods to calculate the value of adding back in this floor area, with the simplest being – nla x annual rental / capitalisation rate= capital value of reduced area (180 x 62,700 / 7.75% = \$809,032.25

d) The \$809,032.25 represents the gross increase in value. The cost of constructing the 207 GFA needs to be subtracted from this figure/ The cost of construction has been assessed at \$1500 per sqm GFA plus Fees, Finance, holding costs, providing a total of \$1,688.40 per sqm GFA or a total of \$349,498.80.

e) The cost of development foregone is therefore \$809,032.25 less the \$349,498.80, **totaling \$459,533.45**

Therefore it is this value we have now included in our remission application.

3. Revision of Remission requested

Following the revision of the "cost of development foregone" we have now revised, finally, our contribution to the built heritage and subsequently the remission amount requested from the WCC.

Additional Design Fees to provide sympathetic interface with Thistle Inn	\$97,500.00
Additional building costs to change the façade to provide interface	\$165,000.00
Canopy to Thistle Inn level 1	\$42,006.15
Cost of Development Foregone	\$459,533.45
Total cost of contribution to Heritage (excl GST)	\$764,039.60
Remission requested – still 50%	\$382,019.80
Add GST to compare with WCC contribution calculation	\$47,752.48
Total Remission requested	\$429,772.27
Development Contribution to be paid (\$982,137.22 - \$429,772.27)	\$552,364.95

4. City Partnership

I have attached Chris Gudgeon's letter to the WCC in Feb 2006 outlining his frustration at the WCC position in respect of the notification process and the "neighbours approval issue".

What is clear is that the WCC gained significant voluntary changes to the development including

- Bulk reduction to Mulgrave St for Thistle Inn
- Loss of carparking for active edge on Mulgrave St
- Façade changes to Mulgrave and Kate Sheppard Place buildings'
- Addition of separate Aitken public link through building

We believe that we have acted in accordance with the spirit of cooperation and in partnership with the Council required in the protection of the built heritage. The outcome was more than "desirable" to the Council, it was vital. The Council could not achieve its goals re heritage protection by mandatory means and has relied on our generosity to reduce the bulk of the Centre at our sole expense. The result of all our endeavours and contributions has been to achieve a first class addition to the City's "Government precinct". Capital Properties simply requests that the Council "partner" by now remitting part of the development contribution as proposed above.

The Development contribution remission is really the only area that the Council has latitude to give something back to those Developers/Owners who make a positive contribution to the City.

The Council should also not underestimate the lack of developer confidence in Wellington, with the office vacancy increases, market rentals decreasing, increasing hurdles being placed in front of developers by the WCC planning teams, lack of Developer incentives, organizations like ours will be comparing Wellington with other major cities in Australasia for placement of capital resources.

Yours sincerely

AMP CAPITAL INVESTORS (NEW ZEALAND) LIMITED



Andrew Robinson

DEVELOPMENT MANAGER

ph 04 494-2105

email: andrew.robinson@ampcapital.co.nz

Andrew Robinson

From: Hugh Mackenzie [Hugh.Mackenzie@nz.rlb.com]
Sent: Thursday, 13 May 2010 11:58 a.m.
To: Andrew Robinson
Subject: RE: Vogel Centre - dev contns remission hearing

Andrew

Firstly we agree with your construction cost rate of \$2,100/m2 of gross floor area for Stage 1a of the Vogel Centre.

Your comments on what elements need to be included/excluded in assessing an extra value rate for the area increase is, in our opinion, accurate.

We suggest that the rate of \$1,500/m2 of GFA reflects accurately the adjustment to be made for the 207m2 of GFA noted.

Regards

Hugh Mackenzie

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From: Andrew Robinson [mailto:Andrew.Robinson@ampcapital.co.nz]
Sent: Wednesday, 12 May 2010 3:25 p.m.
To: Hugh Mackenzie
Subject: Vogel Centre - dev contns remission hearing

Hugh,

further to our discussion this morning, iwe have lost 180(say 207) sqm of lost NLA due to the changes we had to make to the Mulgrave block for the Thistle Inn. In discussions with the WCC it is important that we present a case that includes the "cost of adding back in the area we have lost/foregone" Can you please advise an appropriate rate /sqm GFA for this.

The adding back should be the marginal cost /or incremental cost of the some structure, services , facade but i expect will not include the central plant as this would already be in place

The overall construction rate per sqm GFA for stage 1a was approx \$2,100 so i guess we would be somewhere around the \$1500 mark ?

Can you please confirm asap.

Thanks for your help.

Regards

Andrew Robinson | Development Manager | AMP Capital Investors (New Zealand) Ltd
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14/05/2010

Andrew Robinson

From: Andrew Washington [andrew.washington@colliers.co.nz]
Sent: Wednesday, 12 May 2010 11:25 a.m.
To: Andrew Robinson
Subject: Vogel Building

Hi Andrew

You have asked that we confirm the yield or capitalisation rate adopted in our 31 March 2010 valuation of your property.

We adopted 7.75% and so if an additional \$62,700 per annum income was added then our valuation would increase by \$809,032.

I trust this assists with your current deliberations.

Regards

Andrew Washington BCom (VPM) SPINZ
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28 February 2006

Mr. Garry Poole
Chief Executive
Wellington City Council
PO Box 2199
WELLINGTON

file copy

Mr. Ernst Zollner
Director, Strategy & Planning Directorate
Wellington City Council
PO Box 2199
WELLINGTON

Dear Garry & Ernst,

Re: Vogel Campus Development– Resource Consent Application

Thank you for meeting with myself, Alistair Aburn and Jim Lynch yesterday. We appreciate your subsequent confirmation that you will be briefing us on the issues identified in the review of our resource consent application conducted within Council between 13-24 February and that you will be giving us a reasonable opportunity to address those concerns.

I expect that you may have detected some frustration expressed on our behalf at yesterday's meeting. For the reasons set out below, I would appreciate your leadership and involvement to assist us to productively conclude a resource consent application process that commenced with our meeting with you on 24 August last year.

As you know, the Vogel Campus development proposal has been developed by Capital Properties in response to the National Office accommodation requirements of the Ministry of Justice. The creation of a National Office represents a vital step forward in the merger of the Ministry of Justice and Department for Courts by bringing approximately 700 people together under one roof in a modern office complex. The Ministry has obtained both Treasury and Cabinet approval to this proposal with the expectation that it can be delivered for their occupation in 2008. If we are serious about serving the needs of government in New Zealand's capital city we believe it is incumbent upon both Capital Properties and Wellington City Council *to work together* to put in place the necessary resource consents to enable this development to proceed. In order to achieve the 2008 completion requirement, the brief to our consultant team from the outset has been to design a development that was contemplated by the provisions of the District Plan *to avoid any need for notification*.

Council appointed Mary O'Callahan to process our resource consent application and since September last year we have worked with Mary and Council's officers Gerald Blunt (urban design), Steve Spence (traffic) and Mike Donn (wind). Mary also organised the input of Sally Dosser of Phillips Fox (as Council's legal adviser) and discussions were held with Alistair Aburn (Capital Properties planning consultant) and Jim Lynch (as Capital Properties legal adviser).

Subsequently an understanding was reached that our consent application would be able to be processed on non-notified basis without service, provided that we worked through design issues in relation to urban design, wind and traffic.

As a result of a huge effort by our consultant team and constructive interaction with Council officers, steady progress was made in this respect, culminating in a letter dated 16 January 2006 from Halley Wiseman, Resource Consents Planner, Wellington City Council. This letter stated that *"If the above issues can be resolved satisfactorily, I anticipate the application will be able to*

be processed on a non-notified basis, without service". The 'above issues' referred to in the letter effectively quarantined a defined list of final items to be ticked off in terms of urban design, wind and traffic. These final items were the subject of further extensive discussions with Council and on 10 February Capital Properties provided Council with an amended set of application drawings that we believed addressed all issues to the satisfaction of Council officers. On 13 February we were advised by Mary O'Callahan that she had everything she needed to prepare her report which Capital Properties believed would enable the application to be processed *without notification* as anticipated in Council's letter of 16 January.

I was therefore dismayed to hear on 24 February and subsequently again at our meeting on 27 February, that following internal meetings held by Council officers, Council were apparently considering requiring the application to be notified. To us this represents an 'about face' by Council that disregards the months of work by Capital Properties and its design team to address all issues of concern raised by Council to the apparent satisfaction of Council officers. At the meeting of 27 February, Ernst Zollner said the issue triggering Council's changed view was the scale of the development in relation to the Thistle Inn. Yet this one of the issues discussed comprehensively between our respective designers which we understood had been resolved (refer next para). I find it unbelievable that the Council, at this late stage, wishes to reopen discussions on this matter.

We take this opportunity to quote from Council's 16 January 2006 letter. The letter states, referring to Gerald Blunt's assessment, *"In general he (Gerald Blunt) supports the development but there are several matters that he considers need to be provided for within the development and/or amended."* None of the matters identified by Gerald in Council's 16 January 2006 letter related to the scale of the proposed development in relation to the Thistle Inn. This was consistent with the understanding our architects had reached with Gerald *that we had done sufficient to get his approval in this respect.* As mentioned in the preceding paragraph, we are dismayed to hear that this is the area that Council is wishing to revisit *yet again.*

As previously mentioned, the brief to our consultant team from the outset has been to design a development as contemplated by the provisions of the District Plan to avoid any need for notification. We believe it is entirely reasonable that Council should reach such a conclusion in its processing of our application, for the following reasons:

1. Heritage Considerations in relation to the Thistle Inn

Capital Properties engaged the services of two well respected architectural practices, Craig Craig Moller and Harriot & Melhuish, to design a sympathetic interface between the proposed development and the Thistle Inn. This work was carried out with exhaustive consultation with Gerald Blunt, as Council's urban design specialist. The outcome has resulted in the development being set back from the Thistle Inn, with deep set modelling of the southern façade and the selection of small scale sympathetic façade elements.

Capital Properties has taken a responsible, consultative approach by incorporating these features at a significant cost in terms of loss of floor area and expensive façade treatments. Capital Properties has taken this approach even though there are no provisions in the District Plan requiring setbacks or any other special treatment for buildings adjacent to a heritage building. It should be noted that the absence of such a requirement in the District Plan is not a 'gap' in the District Plan or a 'special circumstance' which would require notification (refer to the S&M Holdings Ltd v Wellington City Council case).

2. Compliance with Central Area Design Guidelines

The proposed development has been designed in accordance with the principles of the Central Area Design Guidelines set out as part of the District Plan. These guidelines make it

clear that buildings up to and including the seventh storey *should be built to the front and side boundaries*.

Wellington City Council granted resource consent on this basis to the developers of our neighbouring apartment buildings, without requiring notification or neighbours' approval. Prior to granting consent for the Suites On Aitken apartment development, Council were advised by Capital Properties that it intended to develop the Vogel site so that Council could ensure that apartments, when built right up to the boundary, would not rely on views, light and outlook over Capital Properties site. Council wrote back (letter dated 4/2/02) stating that Capital Properties were not an affected party and that neighbouring developments could be constructed right up to the boundary.

It follows then that when the Kate Sheppard Apartments resource consent application was granted by Council, the Council were fully aware that Capital Properties intended to develop its site and were entitled to build right up to the boundary, in exactly the same way as Council permitted the Kate Sheppard Apartments to be built up to the boundary.

If there are now issues with Building Act compliance or the loss of amenity to apartments, rectification should not occur at Capital Properties cost or by requiring Capital Properties to set back from the boundary.

3. Non Complying Activity Status

The existing Vogel Building exceeds the currently permissible height limits, having been constructed prior to the introduction of the current height limits. Apparently this could potentially create a 'technical' non complying status for the proposed new building (which does comply with the discretionary height limits), on the grounds that new building is to be integrated with the podium of the existing Vogel Building.

If Council chose to make such a technical interpretation to trigger a notification requirement for the whole development on the basis that 'the effects were more than minor' given its scale, with no regard for the scale of development contemplated by the District Plan, we would be in the absurd situation where we would have to abandon our 'integrated campus' concept and physically disconnect the new building from the existing Vogel building. In this way the resource consent for the new building could be processed as a restricted discretionary activity without notification. The result would be a development with the same environmental impact but arguably with a poorer urban design outcome resulting from the loss of connection between buildings. From the viewpoint of the Ministry of Justice, the benefit of the large 4,000 sq.m. podium floorplates created by connecting the existing Vogel Building podium with the new building would be lost. The large podium floorplates are specifically designed to enable the Ministry to consolidate its entire organisation over 4 large floors around a central atrium, per the 'integrated campus' concept.

If Council sets the wrong precedent here it would result in a massive disincentive to refurbish buildings that currently exceed permissible height limits in Thorndon. Capital Properties intends to refurbish Vogel, Charles Fergusson and Bowen State and to integrate them with new buildings, per the 'integrated campus' concept which is designed specifically to meet the needs of large government tenants. Condemning such schemes to a 'non complying' status requiring notification actively discourages exactly the sort of investment that the capital city/government sector needs.

In conclusion, we have been led to believe by Council that we could reasonably anticipate receiving a resource consent on a non notified basis without service on neighbours. We believe we had reached a position on 13 February where we were on track to receive such a consent having put in a huge amount of effort in terms of design to satisfy Council Officers. We appreciate that urban design considerations are somewhat subjective, but we feel we have 'bent over backwards' to satisfy Gerald Blunt and that we are entitled to rely on the understanding our architects reached with Gerald that we had done sufficient to get his approval *particularly* as this related to the scale of the proposed development in relation to the Thistle Inn.

We look forward to meeting with Council to resolve with you a sensible course of action that will enable this important and well designed development to proceed, in a timely manner, for the benefit of the Ministry of Justice and for Wellington as the nation's capital city.

Given the significant investment (approximately \$900,000) we have made in the Vogel Campus development proposal to date, which remains at risk until a resource consent is uplifted, this letter has been copied to the board of directors of Capital Properties. For your information, this letter has also been copied to Sandi Beattie, as Acting Secretary for Justice, who is most concerned that a resource consent is issued in time to achieve the Ministry of Justice's objective of taking occupation of the completed development in 2008.

Yours sincerely

CAPITAL PROPERTIES NEW ZEALAND LIMITED

Chris Gudgeon
CHIEF EXECUTIVE OFFICER

Copy to:

Murray Gribben
Chairman
Capital Properties New Zealand Limited

James Ogden
Director
Capital Properties New Zealand Limited

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