

**Before the Hearings Panel
Appointed by Wellington City Council**

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Wellington City Proposed
District Plan

**STATEMENT OF EVIDENCE OF DEAN RAYMOND ON BEHALF OF
HERITAGE NEW ZEALAND POUHERE TAONGA**

WELLINGTON CITY PROPOSED DISTRICT PLAN – HEARING STREAM 3

Planning Statement

24 April 2023

INTRODUCTION

1. My name is Dean Raymond, and I am employed as Manager and Planner for Heritage New Zealand Pouhere Taonga (HNZPT) based in the Central Region Office, Wellington. I have outlined by qualifications and experience in the statement I prepared for Hearing Stream 1.
2. Although this evidence is not prepared for an Environment Court hearing I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and have complied with it in when preparing this evidence. I have considered all the material facts that I am aware of that might alter or detract from the opinions I express. This evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

SCOPE OF EVIDENCE

3. HNZPT made a submission and further submissions on the Wellington Proposed District Plan (PDP). I was involved in preparing the original submission on the PDP and also the further submission. The HNZPT submission included a number of submission points on the heritage chapter, related schedules, and also on viewshafts and the Sites and Areas of Significance to Māori. I have been asked by HNZPT to assist by providing planning evidence on the PDP.
4. In preparing this evidence I have read the relevant submissions, further submissions, and the Section 42A reports prepared by Council staff and/or consultants. With regard to certain topics I rely on the expert evidence prepared by Dr James Jacobs.
5. The scope of my evidence covers:
 - Definitions related to historic heritage;
 - Glossary terms for Wāhi Tapu, Wāhi Tipuna and Wāhi Tupuna;
 - Historic Heritage chapter, including policies and rules;
 - SASM introductory section;
 - Schedules 1, 2, 3, 4 and 7; and
 - Viewshafts.
6. As a general comment, in my opinion the PDP contains appropriate and comprehensive provisions related to the recognition and protection of historic heritage. This is reflected in the HNZPT submission, which contains only a few points opposing the PDP and/or seeking

substantive amendments. In my view, the changes recommended by the 42A authors will, on the whole, result in an even stronger district plan.

7. My evidence relates to topics which HNZPT included in its submission and further submission. Whilst there are many matters on which I agree with the s42A recommendations, I have focussed my substantive comments on the topics and provisions where I have a different opinion to the 42A author, or where I am offering some additional information. These topics are:
- i. HH-S4, in relation to the height standards for the Newtown Shopping Heritage Area;
 - ii. Appendix 1, in relation to the wording of the advice note on accidental discovery protocol;
 - iii. SCHED1, in relation to additional places in the schedule, being McLean Flats and Hurston in Island Bay;
 - iv. Truby King potential Heritage Area, regarding the appropriate extent of the area; and
 - v. The inclusion of cross-references to New Zealand Heritage List / Rārangī Kōrero (the List) in SCHED7

DEFINITIONS and GLOSSARY

8. Wellington Heritage Professionals submitted that the definition of **archaeological site** in the PDP be amended so that post-1900 sites can also be considered as archaeological sites. HNZPT opposed this submission, as it is inconsistent with the definition provided in the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA).
9. I agree with the 42A author in his assessment of this submission point (paragraphs 115 – 120). While I appreciate the intent of the submitter, that archaeological values are not limited to pre-1900 sites; the definition of archaeological site in the HNZPTA is well established in the heritage profession. From a practical perspective, it assists the plan user to use consistent definitions with those provided in legislation, in this case the HNZPTA.
10. In my current role I am often fielding enquiries from members of the public and various local authorities relating to whether or not archaeology is a matter they need to consider; for example is an archaeological assessment needed for a particular activity? The answer usually depends on if the area was known to be occupied prior to 1900, as guided by the definition for an archaeological site in the HNZPTA. In the case of Wellington the Thomas Ward map of

1891 provides a useful indication of which areas are known to have been settled or occupied in the 19th Century.

11. In my view, if there to be two separate definitions pertaining to what constitutes an archaeological site – one in the district plan and one in the HNZPTA – then this would create confusion for the Plan user with regard to obligations under the Plan and also whether or not the HNZPTA applies. One example in the PDP of potential confusion is the reference in APP1 to the archaeological authority process under the HNZPTA. Two different definitions for *archaeological site* may result in some irrelevant archaeological authority applications for post-1900 sites.
12. While the definition of archaeological site in the PDP should be consistent with the legislative definition, there is scope to consider the *archaeological values* of a place when considering resource consent applications. Archaeological values are a sub-set of physical historic heritage values; physical values being one of the heritage values listed in the introduction to the historic heritage chapter.
13. Regarding the definition of **demolition** in the PDP, I support the 42A author's recommendation on this point for the reasons given in paragraph 127. I also agree with the discussion on the topic of 'demolition by neglect' in paragraphs 172 to 177. I also concur with the recommended addition to the demolition policy (notified policy HH-P10). This is in relation to the extent to which maintenance and repair has been regularly undertaken on a building which is slated for demolition.
14. The 42A author has made a recommendation for a change to the definition of **Heritage Building**, by inserting the words 'or protected parts of a building' (paragraph 184). In my opinion this provides added clarity to the definition and as such I support this recommendation.
15. In Hearing Stream 1 the glossary terms **wāhi tapu** and **wāhi tūpuna** were discussed. I have considered the statement by Te Rūnanga o Toa Rangatira in support of their further submission on this topic (provided in response to a question from the hearing panel). As the terms are closely related to the Sites and Areas of Significance to Māori chapter, I would like to add a further comment to my evidence submitted for Hearing Stream 1 on this topic.

16. Explanations or translations for the terms as used in the PDP have been provided in the glossary. The glossary appears to be a space in the PDP where mana whenua groups are providing context and meaning to the work in which they have been involved. This is different to terms being defined in a more legal or planning context, and included in the list of definitions. I have also considered how the terms are used in the PDP, and it appears that there are no PDP provisions, in particular rules, which would rely on a definition of these terms. As the words are not subject to a definition in the PDP, there is less need for consistency with definitions in other legislation. It would also be informative for the panel to ascertain the views of Taranaki Whānui on this matter.

HISTORIC HERITAGE INTRODUCTORY SECTION

17. APP1 – Historic Heritage Advice Notes, which is referenced in the introductory section of the Historic Heritage Chapter, contains references to the role of HNZPT with regard to archaeological sites. HNZPT submitted that this reference also be included within the Historic Heritage chapter. I note that this has been recommended to be included (42A paragraph 148).

HISTORIC HERITAGE OBJECTIVES AND POLICIES

18. In paragraphs 219 to 250 the 42A author discusses **HH-P3**, and particularly the controls on internal structural works and changes to floor levels. I agree with his observations and conclusions in this section. In particular, I concur with his recommendations for changes to the activity status for some of these activities, and the recommended amendment to HH-P3. I will comment further on the amended rules under the ‘rules’ section below.

19. **HH-P4** is discussed in paragraphs 254 to 262. I am in agreement with the minor amendments to this policy to include references to ‘recognised conservation principles and methods’ and ‘ongoing functionality’.

20. I agree with the reasoning of the 42A author in paragraph 267, regarding requested amendments to **HH-P5**. I also agree with re-ordering the policy, so that it comes directly after HH-P1.

21. The 42A author discusses **HH-P7** in paragraphs 285 to 303. I agree with all the recommendations in this section, including adding ‘functionality’ to clause a, retention of the

words 'architectural style' in clause c, and addition of the word 'design' in clause d. I also agree with the comments on retaining the reference to design guides in this policy.

22. Regarding **HH-P8**, I agree with the comments in paragraphs 304 to 310, and the recommended minor change to this policy.
23. Regarding policy **HH-P9**, the 42A author has made a recommendation to separate the policy direction on relocating a building to a different site from repositioning within the same site (paragraphs 311 to 318). I concur with this approach, as the effects on heritage values are often more acceptable when a building or structure is shifted within its site, compared to being relocated to a completely different setting and context. I also concur with the statement in paragraph 318 that relocation should be considered as the penultimate option before total demolition. In my opinion the revised policies are clearly articulated and will better achieve the objectives of the historic heritage chapter.
24. The 42A author has responded to a submitter seeking increased heights within the Newtown Shopping Heritage Area – this submission point comes under **HH-P11**. I concur with the recommendation in relation to this submission point, to retain HH-P11 as notified (paragraph 339). I have commented further on the issue of the appropriate height limits of this Heritage Area in relation to HH-S4.
25. In paragraphs 365 to 381 the 42A author addresses submission points on **HH-P15** and **HH-P16**, which relate to relocation and demolition of contributing buildings within a Heritage Area. HNZPT submitted on these policies that both relocation and demolition should be seen as a 'last resort' when all other options have been thoroughly canvassed.
26. I am in agreement with the author in both his analysis and recommendations. The recommendations on HH-P15 and HH-P16 are consistent with the recommendations on HH-P9, with regard to differentiating between repositioning within a site (or area), and relocation out of the site/area. The suggested amendments to the HH-P16 in my view will satisfy the intent of the HNZPT submission, with regards to the 'no reasonable alternatives' clause. Again, this wording is consistent with the other demolition policy - HH-P10.

HISTORIC HERITAGE RULES AND STANDARDS

27. Paragraphs 406 to 430 address submissions on **HH-R3, HH-R4, and HH-R5**. I note that the recommendations for these rules is they remain as notified. I concur with these recommendations, for the reasons provided in the report.
28. The 42A author has recommended the addition of information requirements for applications under **HH-R8**. I agree that these are logical and appropriate matters and that including these in the Plan will assist plan users in preparing comprehensive resource consent applications.
29. I support the changes recommended to **HH-R9** (demolition rule – paragraph 456), noting in particular, the additions to the information requirements which includes the requirement for a description of the regular maintenance and repair undertaken on the building. This recommendation ties in with the amendment to the policy framework to help avoid demolition by neglect situations.
30. I note the recommended changes to rules **HH-R11, HH-R13, HH-R15 and HH-R16** in paragraphs 462 to 516. I concur with the recommended changes for the reasons given in the report.
31. Turning to **HH-S1**, I note that the 42A author has recommended that this standard be deleted and instead the matters covered in the standard be incorporated into the rules framework. The new proposed rules are HH-R6 and HH-R17. I agree with these recommendations, which in my view, will result in an appropriate planning framework to manage these matters.
32. Regarding **HH-S4**, the 42A author has recommended an increase of the height limit in the Newtown Shopping Heritage Area from 12m to 18m (paragraph 568). This is in response to a submission from Anna Kemble Welch, who requested that the height limit be increased to provide for 6 metre buildings set back from the street, while retaining the heritage street frontages.
33. I have read the evidence of Mr Jacobs on this matter (his statement paragraphs 48 to 52), and in my opinion there are strong heritage reasons for retaining the height limit within this Heritage Area at 12 metres. I also note that Dr Jacobs is in agreement with Ms Smith in this matter.
34. I disagree with Mr McCutcheon's recommendation on this matter, for the following reasons:

- a. The Newtown Shopping Heritage Area is characterised by one and two storey buildings, with only four 3 storey buildings within the Heritage Area. There is therefore substantial development capacity within the area in terms of increasing the height of buildings up to the 12m height limit.
 - b. The Heritage Area is only one property wide, with properties to the rear having 21 or 22 metre height limits. This in effect creates a setback of higher development from the main street frontages.
 - c. There are substantial parts of the Newtown commercial area, outside the boundary of the Heritage Area, which are zoned Local Centre in the PDP. The PDP height limit in these areas is 22 metres. Approximately only 35% of the Local Centre Zone in Newtown is part of the Heritage Area. I have undertaken this estimate using the PDP online measuring tool, taking the LCZ areas to the south of Hall Street, and excluding the roads within the area.
 - d. There is a consenting pathway for any property owner who wishes to construct higher than 12m in the Heritage Area. This is under rules HH-R11 (for alterations and additions) and HH-R13 (for new buildings) both as Restricted Discretionary Activities.
 - e. The standard as recommended to be amended (from 12m to 18m) does not provide for the 'set back' from the street frontage as requested by the submitter.
35. The 42A author refers to the proposed Mass Rapid Transit (MRT) system and the fact that this is partially reliant on the ability to support the delivery of high levels of intensification in the southern corridor. I disagree with the use of the MRT proposal to justify an increase the height limit in the Heritage Area.
36. The MRT proposal has been in the pipeline for some time now, and was included in the October 2021 Wellington Regional Transport Plan, which is prior to the notification of the PDP. As such, the implications of the proposed MRT would have already been considered in terms of levels of intensification provided for along the proposed MRT route and for and the qualifying matters which apply in this area.
37. Identified and scheduled historic heritage areas and buildings have been identified as qualifying matters in the PDP. These qualifying matters have been considered in the Property Economics Report - Qualifying Matters Capacity Assessment, dated November 2022. The findings in this report have been confirmed in the statement of Philip Osborne on behalf of the Wellington City Council in Hearing Stream 1, that the *'Wellington City PDP provides more*

than sufficient residential development capacity through to 2051' (paragraph 2.18). Based on these statements, I do not consider there is any need for the height standards in the Newtown Heritage Area to be increased to provide for additional development capacity.

38. Regarding standards **HH-S5**, **HH-S6**, and **HH-S7**, I note the recommendation that the contents of these standards are relocated into the rules section (paragraphs 571 to 582). It appears that this change has not resulted in any change to the intent of these provisions and as such I agree with this recommendation.

APPENDIX 1 – HISTORIC HERITAGE ADVICE NOTES

39. I note that the 42A author has recommended not accepting the HNZPT submission requesting that the accidental discovery protocol advice be amended to require notification to iwi representatives when any koiwi/human remains or artifacts/taonga tūturu are found (paragraph 652). I disagree with this recommendation.

40. It appears from the author's assessment that he has conflated the two matters of discoveries of Taonga Tūturu and archaeological finds of Māori origin in general. Taonga Tūturu (artefacts) are, as the author notes, governed by the Protected Objects Act 1975, where there is an established process when taonga tūturu are discovered. Taonga tūturu does not include koiwi, therefore such a discovery is not covered by the Protected Objects Act 1975.

41. HNZPT provides a lot of guidance and advice in relation to accidental discovery protocols. It is best practice that iwi authorities be notified if there are any archaeological discoveries of Māori origin, including koiwi. This allows for tikanga to be respected and provided for when these discoveries are made. This is a respected and standard practice for archaeologists and those working in heritage and it is the standard advice provided by HNZPT in relation to accidental discovery protocols. For these reasons, I consider this should be reflected in the Plan wording.

42. I recommend the following amendments to this section of the Historic Heritage Advice Notes:

If you discover a previously unrecorded archaeological site (for example, when you are undertaking earthworks, you must stop any work that could affect the site and contact Heritage New Zealand Pouhere Taonga for advice on how to proceed. The Police will also need to be notified if any koiwi/human remains are revealed. Where the discovery is of Māori origin the relevant iwi representatives will need to be

~~notified. and if~~ any ~~artifacts~~ Māori artefacts/taonga tūturu are found the Ministry for Culture and Heritage must be notified.

43. The amendments I am recommending incorporate the submission point made by HNZPT. There are several other minor aspects to the amendment: The addition text is best placed immediately after the section on koiwi, and the taonga tūturu clause is best placed in a separate sentence. I am also suggesting adding the words Māori artefacts, and also changing the spelling to the British version of the word most commonly used in New Zealand, rather than the American 'artifacts'. In my view these changes will result in a clearer and more comprehensive advice note.
44. Regarding the other amendments the 42A author has recommended to the Historic Heritage Advice Notes, I agree with these changes.

SCHEDULE 1 – HERITAGE BUILDINGS

45. Policy 21 of the RPS provides criteria to ensure significant historic heritage resources are consistently identified in district and regional plans. The criteria provide a basis by which to assess places, sites or areas against to describe and evaluate historic heritage and ultimately consider whether a place has significant historic heritage values and thus, should be identified in the district or regional plan.
46. With regard to the places, sites and areas in the PDP, HNZPT used the criteria in the RPS to consider whether they meet the threshold of significant historic heritage values that contribute to an understanding and appreciation of history and culture. Where one or more of the criteria are met, in order to give effect to the RPS, then those places, sites and areas should be included in SCHED1 and be afforded the protections provided by the plan provisions.
47. The RPS further sets out in Method 20 the method by which to implement Policy 21. Method 20 states: "Prepare information to assist with interpretation of the criteria set out in policies 21 and 22, which require the identification and protection of places, sites and areas with significant historic heritage values".
48. I refer to the evidence statement of Dr Jacobs with regard to the heritage values and criteria met in the places, sites and areas in the PDP and provide my additional comments as follows.

SCHED1

49. The 42A author addresses **item 120** Our Lady Star of the Sea in paragraphs 677 to 683. I note that the chapel is entered on the List as a Category 2 historic place (List number 1413), and the whole complex is also entered as an Historic Area (List number 7042). I agree with the proposed amendments to the SCHED1 entry, as this will clarify which parts of the site are included in the schedule, and which parts are not. I note that the PDP maps indicate the three scheduled places with three separate purple pentagons.
50. I have noted the 42A author's recommendations to retain items **299** (Gordon Wilson Flats), **520** (Kahn House) and **524** (143 Willis Street) in **SCHED1**. Based on the evidence of Ms Smith, I agree with the recommendations regarding these places. These recommendations and supporting discussion are contained in paragraphs 684 – 703 (Gordon Wilson Flats); 790 – 799 (Kahn House); and 814 – 820 (134 Willis Street).
51. Dr Jacobs has also included in his evidence statements (paragraphs 29 to 41) regarding the heritage significance of these three places, which confirms the assessment undertaken by Ms Smith.
52. In paragraphs 831 – 850 the author recommends a number of minor technical changes to SCHED1 in response to submission points by HNZPT. I agree with these recommendations.
53. Regarding the concept of ranking or categorisation of SCHED1 places (paragraphs 851 to 867). I accept the author's conclusions on this topic. Amending the schedule in this way would necessitate a complete re-writing of the HH chapter policies, rules, and framework of activity status.
54. I agree with the 42A author (paragraphs 876 to 881) regarding the submission on the State Insurance Building – **Item 181** in SCHED1. Additional work to the 1998 portion of the building could be more intrusive or detract from the current heritage values of the building, therefore any additions and changes to the whole building should be controlled by plan rules.
55. In paragraphs 895 – 899 the question of an appropriate curtilage for Scots College Main Building (SCHED1 item 219) is discussed. I concur that a curtilage for this building is appropriate to limit the application of heritage rules, and Ms Smith has provided cogent reasons (her paragraph 489) for recommending the extent of curtilage.

56. Regarding the HNZPT submission to include the **Wellington Central Library** in SCHED1, I have considered the evidence of Ms Smith and Dr Jacobs, and I accept that, due to the current and ongoing work on this building, the heritage status will need to be re-visited after completion of the current project.
57. Regarding **McLean Flats** I have considered the evidence of Ms Smith along with the statement of Dr Jacobs. I refer to the assessment in Dr Jacob's statement regarding the historic heritage values of McLean Flats (paragraphs 15 to 23). This evidence demonstrates that McLean Flats meets several of the criteria as set out in Policy 21 of the RPS and therefore should be included in SCHED1.
58. In preparing the HNZPT submission on the PDP, I made contact with the nuns currently residing at **Hurston**, and met in person with Sister Elcy on 29 September 2022. Miranda Williamson, who authored the HNZPT Listing report for Hurston, accompanied me on the visit. I explained the difference between the List and the District Plan, and what the implications would be of the building being included in SCHED1. Whilst I am satisfied that sister Elcy understood the importance of Hurston and the protection framework, the complication with owner engagement is that the nuns residing in Hurston do not have the decision-making responsibility relating to the property. These decisions would be made by someone at a higher level within their order – The Missionary Sisters of St Peter Claver.

I have considered the evidence of Ms Smith along with the statement of Dr Jacobs (his paragraph 24 to 28) regarding the historic heritage values of Hurston. This evidence demonstrates that Hurston meets several of the criteria as set out in Policy 21 of the RPS and therefore should be included in SCHED1.

SCHEDULES 2, 3 AND 4

59. In paragraphs 990 to 1002 –the author recommends a number of minor technical changes to **SCHED2** in response to submission points by HNZPT. I agree with these recommendations.
60. In paragraphs 1093 to 1100 the 42A author discusses the extent of the **Albion Gold Mining Company Heritage Area** – item 40 in **SCHED3**. Ms Smith has also comprehensively investigated the logical and practical extent of the area, and has recommended changes to the extent of

the area. I support the recommended changes. For reference I have included an illustration of the extent of the area, as listed by HNZPT.

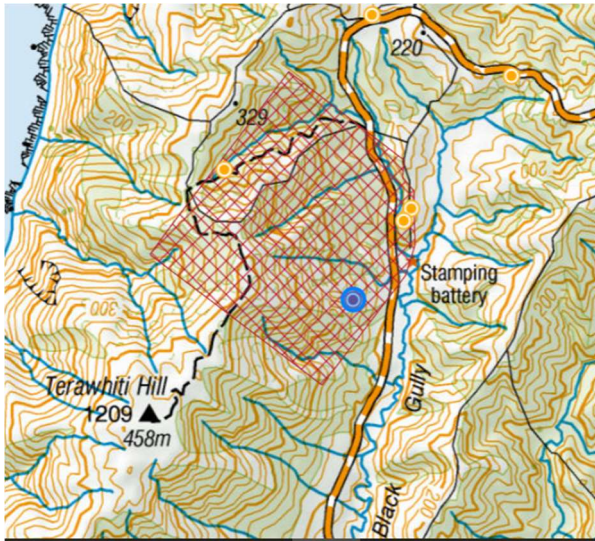


Figure 1: Extent of Heritage New Zealand List number 9032

61. In paragraphs 1101 to 1120 the author recommends a number of minor technical changes to **SCHED3** in response to submission points by HNZPT. I agree with these recommendations.
62. In paragraphs 1225 – 1232 the author recommends that **Truby King** Heritage Area be added to SCHED3. As noted in the 42A report, and in paragraphs 991 to 1004 of Ms Smith’s evidence, there are currently three buildings within the area which are included in SCHED1. Ms Smith includes, in paragraph 1000, a list of buildings and features which she recommends to include in the heritage area.
63. Mr McCutcheon has flagged the issue that some of this land is privately owned, and the owners have not been engaged with the process of adding their property in the PDP heritage schedules.
64. The panel may wish to consider an alternative extent of heritage area, would encompass the three places currently identified in the PDP, plus the surrounding gardens and landscaping features which are intrinsic to the heritage values of the place. The absence, due to demolition, of the Karitane Hospital, and the limited reference to the 1962 Nurses Home in the HNZPT Listing report, provides justification for excluding the site of the former hospital and the nurses home from the extent of the scheduled area. Dr Jacobs has also included a

statement in his evidence (paragraph 46) that the extent should not include the site of the former hospital.

65. If the panel took this approach, and in relation to Ms Smith's list in her paragraph 1000, items a, b, c, f, and g would be included, but items d and e would be excluded. The extent of Truby King Heritage Area, as listed by HNZPT, is shown in figure 2 below, while the alternative extent is depicted in figure 3.



Figure 2: Extent of Heritage New Zealand List number 7040

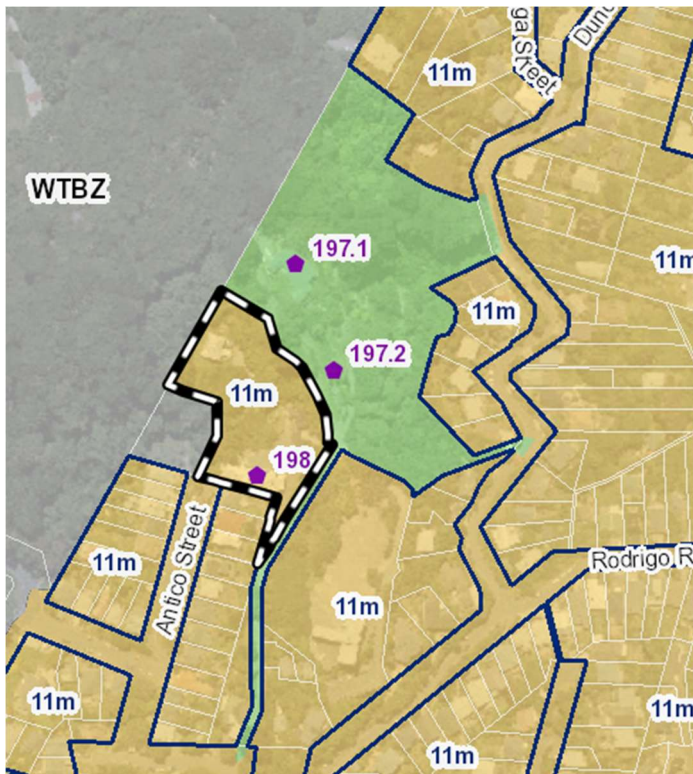


Figure 3: Potential extent of Heritage Area – Green Reserve Land, plus the land containing item #198

66. In paragraphs 1317 to 1320 the author recommends a number of minor technical changes to **SCHED4** in response to submission points by HNZPT. I agree with these recommendations.

SITES AND AREAS OF SIGNIFICANCE TO MĀORI

67. I note that in Paragraph 1529 the author recommends that reference to the HNZPTA is included in the introduction to the Sites and Areas of Significance to Māori chapter. I agree that this addition will aid plan users in reminding them that the archaeological authority process exists in tandem with any processes under the RMA and the District Plan.
68. Regarding the 42a author’s comment in paragraph 1650, I have attempted to cross-reference the scheduled places in **Schedule 7** with the database of recorded archaeological sites. This has proved difficult, as the geographic locations of recorded sites is not always accurate, and also because Schedule 7 includes several places with the same name – for example #6 Tūāpapa, Rua - terraces and pits and #17 Tūāpapa, Rua – terraces and pits. I am unfortunately not able to provide further assistance with regard to cross referencing the NZAA site numbers with the places scheduled in SCHED7.

69. There are several places identified in SCHED7 which are also entered on the New Zealand Heritage List / Rārangi Kōrero. These are more readily identified and could be readily added as references to SCHED7. My suggestion to the Panel is that these references be added to SCHED7. The places are:

SCHED7 item	Name	HNZPT list number
14	Ōhau Kāinga 2	Makara Pā, Category 2 Historic Place 6143
21	Te Ika-a-Maru Pā 2	Category 2 Historic Place 6045
22	Te Ika-a-Maru Pā 1	Category 2 Historic Place 6046
66	Te Aro Pā	Toenga o Te Aro Category 1 Historic Place 7771
88, 159	Taputeranga Island	Tapu te Ranga Wāhi Tapu 7654
106	Poito Pā	Wāhi Tapu Area 9648
107	Rangitatau Pā	Wāhi Tapu Area 9648
108	Tarakena Pā	Wāhi Tapu Area 9648

VIEWSHAFTS

70. HNZPT submitted regarding the viewshaft referred to as Viewshaft 21 in the Operative District Plan, that this viewshaft should be maintained in the PDP.

71. The 42A report on viewshafts responds to the HNZPT submission and recommends an alternative viewshaft (paragraph 94). The alternative recommended viewshaft is from the Tomb of the Unknown Warrior towards the 'Western Hills', and particularly the peak Kaukau, which is directly north of the War Memorial site. In my opinion this amended viewshaft will satisfy the matters raised in the HNZPT submission.



Dean Raymond

24 April 2023