

Tuesday, 11 June 2024

Te Hui o Te Kaunihera ā-Rohe o Heretaunga
Hastings District Council
Council Meeting

Kaupapataka

Volume 7

(Submissions 431 – 461)

Te Rā Hui:
Meeting date: **Tuesday, 11 June 2024**

Te Wā:
Time: **9.00am**

Te Wāhi:
Venue: **Council Chamber
Ground Floor
Civic Administration Building
Lyndon Road East
Hastings**

ITEM	SUBJECT	PAGE
5.	LTP SUBMISSIONS (431 - 461)	
Attachment 1:	Corporate Planning - 2024 LTP - Submissions and Responses - Mel Young	3
Attachment 2:	Corporate Planning - 2024 LTP - Submissions and Responses - Leonie Wallwork	5
Attachment 3:	Corporate Planning - 2024 LTP - Submissions and Responses - Brenda Duff	11
Attachment 4:	Corporate Planning - 2024 LTP - Submissions and Responses - Phil Stickney	13
Attachment 5:	Corporate Planning - 2024 LTP - Submissions and Responses - Rachel Landon	21
Attachment 6:	Corporate Planning - 2024 LTP - Submissions and Responses - Stewart Horn	29
Attachment 7:	Corporate Planning - 2024 LTP - Submissions and Responses - Jacqui Hartley-Smith	31
Attachment 8:	Corporate Planning - 2024 LTP - Submissions and Responses - Tom Evers-Swindell	33
Attachment 9:	Corporate Planning - 2024 LTP - Submissions and Responses - Te Rangi Huata	35
Attachment 10:	Corporate Planning - 2024 LTP - Submissions and Responses - Matthew Holder	37
Attachment 11:	Corporate Planning - 2024 LTP - Submissions and Responses - Andrew Common	45
Attachment 12:	Corporate Planning - 2024 LTP - Submissions and Responses - Tina Haslett	47
Attachment 13:	Corporate Planning - 2024 LTP - Submissions and Responses - Phil Woolley	57
Attachment 14:	Corporate Planning - 2024 LTP - Submissions and Responses - Annie Evans	59
Attachment 15:	Corporate Planning - 2024 LTP - Submissions and Responses - Ryan Hambleton	61
Attachment 16:	Corporate Planning - 2024 LTP - Submissions and Responses - Jeffrey Wood	67
Attachment 17:	Corporate Planning - 2024 LTP - Submissions and Responses - Jeremy Simpson	69

Attachment 18: Corporate Planning - 2024 LTP - Submissions and Responses - Sue Averill	71
Attachment 19: Corporate Planning - 2024 LTP - Submissions and Responses - Anonymous	75
Attachment 20: Corporate Planning - 2024 LTP - Submissions and Responses - Jade Baker	77
Attachment 21: Corporate Planning - 2024 LTP - Submissions and Responses - Tim Averill	91
Attachment 22: Corporate Planning - 2024 LTP - Submissions and Responses - Sarah Harper	95
Attachment 23: Corporate Planning - 2024 LTP - Submissions and Responses - Ian and Diane Thompson	97
Attachment 24: Corporate Planning - 2024 LTP - Submissions and Responses - Chris Ryan	99
Attachment 25: Corporate Planning - 2024 LTP - Submissions and Responses - Robin Sage	103
Attachment 26: Corporate Planning - 2024 LTP - Submissions and Responses - Michael Smiley	105
Attachment 27: Corporate Planning - 2024 LTP - Submissions and Responses - Mark von Dadelszen	107
Attachment 28: Corporate Planning - 2024 LTP - Submissions and Responses - Dean Raymond	109
Attachment 29: Corporate Planning - 2024 LTP - Submissions and Responses - Margaret Ross	113
Attachment 30: Corporate Planning - 2024 LTP - Submissions and Responses - William and Teresa Dever	117
Attachment 31: Corporate Planning - 2024 LTP - Submissions and Responses - Bryce Cullen	119

HDC - 2024 - 2034 Long Term Plan

COMPLETE

#431

CREATED



PUBLIC
May 27th 2024, 4:10:06 pm

IP ADDRESS



* Name

Mel Young

Address

New Zealand

* Daytime contact phone:

2041137797

Evening contact phone:

(No response)

* Email

melanieyoung@gmail.com

* Please indicate whether or not you wish to speak to your submission at a Council Meeting set down for hearing submissions on Tuesday 11 June.

No

* If your submission is a rural matter, it will also be discussed at the Rural Community Board Meeting before this on Tuesday 4 June. Please indicate if you also want to speak to the Rural Community Board.

No

It's about right

It's about right

Pay less, slowdown further

Pay less, take longer and find more savings

5/28/24, 10:53 AM

Wufoo · Entry Detail

Share your thoughts here . . .

Portion of Rubbish and recycling rates should correspond to how often households are using the service...we hardly ever put out the rubbish bin as we have very little waste for landfill but I'm sure the portion paid in rates is the same for everyone in our area. I guess a user pay system...use more pay more. Might encourage people to recycle more, especially soft plastics!

Attach a document to your submission

Item

HDC - 2024 - 2034 Long Term Plan

COMPLETE #432

CREATED



PUBLIC
May 27th 2024, 4:12:27 pm

IP ADDRESS



* Name

Leonie Wallwork

Address

112 Market Street North
112 Market Street
Hastings
Hawkes Bay
4110
New Zealand

* Daytime contact phone:

274278939

Evening contact phone:

274278939

* Email

leonie@ngatoihawkesbay.co.nz

* Please indicate whether or not you wish to speak to your submission at a Council Meeting set down for hearing submissions on Tuesday 11 June.

Yes

* If your submission is a rural matter, it will also be discussed at the Rural Community Board Meeting before this on Tuesday 4 June. Please indicate if you also want to speak to the Rural Community Board.

No

It's about right

It's about right

It's about right

5/28/24, 10:53 AM

Wufoo · Entry Detail

It's about right

Share your thoughts here . . .

On behalf of the Nga Toi Hawke's Bay Board, thank you for the opportunity to submit to the HDC LTP. Our submission is attached. Please do not hesitate to contact us if you have any questions or require any clarification.
Nga mihi nui
Leonie Wallwork

Attach a document to your submission

submission_to_hdc_ltp_v1.0.pdf

Introduction

In response to the HDC LTP, we acknowledge the tight fiscal constraints facing the Council and the tough decisions that need to be made across the four core areas including delaying some of the 'nice-to-have' projects.

Nga Toi HB is the only independent regional arts organisation advocating for and enabling the voice of creatives from Wairoa to Central HB. Our leadership role in driving the Toi-tū regional strategic framework in collaboration with the Toi-tū steering group, is pivotal in achieving outcomes that benefit the entire region.

Nga Toi HB is working on a diverse funding strategy that will enable us to build capacity and capability by accessing multiple sustainable revenue streams over time. We have been applying for additional grants, developing partnerships, and looking at how we can optimise our business model to ensure we deliver on our roles and responsibilities under the Toi-tū framework and expectations of our sector.

The primary purpose of the Toi-tū Regional Strategic Framework is to support creatives and creativity in Te Matau a Māui / Hawke's Bay. The Toi-tū framework is supported by all Councils and has council officer representation on the steering group responsible for ensuring the framework is integrated into Toi-tū strategy and policy decisions.

Ngā Toi Hawke's Bay was contracted by HDC with Creative NZ funding to review and launch the revised Toi-tū framework. As the backbone organisation and independent advocacy body leading the collaboration and implementation of the framework, we need to be adequately resourced to deliver on our roles and responsibilities as outlined in the framework.

The Framework serves as a guiding light for the development of our current and future arts, culture, and creative initiatives within Te Matau a Māui / Hawke's Bay. Recognising Heretaunga as a hub of creativity and cultural identity, the framework amplifies the voices and presence of all members of our community. Through our many collaborating partners, including Arts Inc. Heretaunga, we have a joint mission to help everyone's scarce dollar go further if we all apply our resources to address gaps and seize opportunities.

Why?

Economic Impact: By fostering a dynamic arts and culture scene in Heretaunga, we can stimulate local businesses, create jobs, attract talent, and encourage tourism, boosting our local economy.

Studies have shown that investment in the arts leads to significant economic benefits.

- Creative New Zealand reports that the arts and creative sector contributes approximately \$10.9 billion to New Zealand's GDP and employs more than 90,000 people.
- For example, the Art Deco Festival in Napier in 2024, brought over 50,000 visitors, generating an estimated \$8.7 million for the Hawke's Bay economy, and contributing a gross benefit of \$22 million to New Zealand's economy.
- Events, like arts festivals, not only boost local businesses but also create jobs and exponentially stimulate our economy across multiple sectors.

- In recent recruitment advertising, Hawke's Bay DHB listed arts and culture as an attractive regional amenity that would attract health professionals to the district.

Community Identity and Cohesion: Creativity is not just an expression; it is a catalyst for opportunity, innovation, and enterprise.

- Research by the National Endowment for the Arts in the United States highlights how arts participation leads to improved community cohesion, increased civic engagement, and enhanced social well-being.
- Arts, culture, and creativity play a vital role in enabling thriving communities so together in partnership we can enable our communities to access and participate in the arts. This is vital for wellbeing and should be seen as an ongoing investment in community.
- On a fact-finding mission to learn from our Christchurch colleagues, we learnt the value of arts, culture, and creativity for recovery, rebuild, and the impact the arts has on the community's sense of belonging, shared pride and community cohesiveness.

Health and Well-being:

The framework covers the four pillars of well-being: Cultural, Environmental, Social, and Economic. By championing arts, culture, and creativity, we celebrate our identity, enhance our environment, ensure access and build connections, and recognise the economic value of the sector, thereby future proofing it for generations to come.

Research underscores the profound impact of arts and culture on community well-being.

A report by the World Health Organisation (WHO) titled "What is the evidence on the role of the arts in improving health and well-being?" states that engagement in the arts can alleviate anxiety, depression, and stress, and improve social cohesion.

Post Cyclone Gabrielle, these benefits are even more critical in supporting our rebuild efforts, as the arts can play a therapeutic role and aid in communal recovery.

Educational Benefits: Numerous studies highlight the positive impact of arts education on academic achievement and personal development.

- According to the New Zealand Council for Educational Research (NZCER), students involved in the arts tend to perform better academically and develop critical thinking and problem-solving skills.

By prioritising arts education within the Toi-tū framework, we can nurture the next generation of innovators and leaders.

In Summary

By prioritising arts and culture in our strategic planning and policy-making processes, we not only enrich our community's fabric but also pave the way for a brighter, more inclusive future. We urge you to lend your support to initiatives that empower our arts community and enable them to be at the forefront of our collective rebuild plans.

To effectively execute the Toi-tū framework, it is essential to maintain its integrity and agility through collective stakeholder engagement. Ngā Toi Hawkes Bay, as the leadership organisation, plays a pivotal role in facilitating collaboration among stakeholders, including HDC, ensuring cohesive efforts towards a vibrant arts, culture, and creative sector.

Call to Action: Creativity, culture and the arts are treasures to be nurtured to grow and to flourish. Your commitment to supporting and investing in Nga Toi HB is crucial in realising this vision for a thriving arts sector despite adversity and current challenges. For collective impact to be realised across Council, arts organisations, and our arts community, we need a step-change in our thinking to ensure the long-term success and vibrancy of our arts, culture and creative sector in Heretaunga.

HDC - 2024 - 2034 Long Term Plan

COMPLETE #433

CREATED



PUBLIC
May 27th 2024, 4:17:25 pm

IP ADDRESS



* Name

Brenda Duff

Address

19 Te Aute Road
Havelock North
Hastings
4130
New Zealand

* Daytime contact phone:

276930342

Evening contact phone:

(No response)

* Email

brendad@xtra.co.nz

* Please indicate whether or not you wish to speak to your submission at a Council Meeting set down for hearing submissions on Tuesday 11 June.

No

* If your submission is a rural matter, it will also be discussed at the Rural Community Board Meeting before this on Tuesday 4 June. Please indicate if you also want to speak to the Rural Community Board.

No

It's about right

It's about right

Pay less, slowdown further

Pay less, take longer and find more savings

5/28/24, 10:53 AM

Wufoo - Entry Detail

Share your thoughts here . . .

Please start to pay off debt and not fund "nice to have" projects. Put them on hold for a few years.
Please stop increasing rates.

Attach a document to your submission

HDC - 2024 - 2034 Long Term Plan

COMPLETE #434

CREATED



PUBLIC
May 27th 2024, 4:18:59 pm

IP ADDRESS



* Name

Phil Stickney

Address

502 Karamu Road North
Hastings
Hawke's Bay
4122
New Zealand

* Daytime contact phone:

68762159

Evening contact phone:

(No response)

* Email

phil.stickney@developmentnous.nz

* Please indicate whether or not you wish to speak to your submission at a Council Meeting set down for hearing submissions on Tuesday 11 June.

Yes

* If your submission is a rural matter, it will also be discussed at the Rural Community Board Meeting before this on Tuesday 4 June. Please indicate if you also want to speak to the Rural Community Board.

No

It's about right

Pay more, expand growth areas for development accept more funding risk to ratepayers

It's about right

5/28/24, 10:53 AM

Wufoo · Entry Detail

Share your thoughts here . . .

Please find attached the Landsdale Developments Submission

Attach a document to your submission

landsdale_hdc_ltp_submission.pdf

To: The Chief Executive
Hastings District Council

SUBMISSION on behalf of Landsdale Developments Limited on the Hastings District Proposed 2024-2034 Long Term and 2024/2025 Proposed Development Contribution Policy

Introduction

- 1.1 Landsdale Developments is a long term participant in land development throughout New Zealand. It was first formed in 1950 and restructured in 2017. It has undertaken residential, industrial and commercial property developments throughout New Zealand. The company was initially based in Hawkes Bay undertaking the large Knightsbridge and Citrus Grove developments in Napier and the Te Mata Road developments in Palm Brook and substantial parts of the Arataki area in Havelock North. The company is currently based in Tauranga.
- 1.2 As a long term participant in land development, Landsdale is committed to sustainable property development. The company agrees with the concept of using Development Contributions to help fund capital expenditure necessitated by growth. As a responsible, long term, participant in property development, it is committed to paying its fair share of the costs that arise from its land development activities. However, the proposed 2024 -2034 Development Contributions Policy does not adhere to the development contribution principles outlined in the Local Government Act and imposes non growth related costs onto new development via the proposed development contributions.
- 1.3 The policy must be revised to ensure that the costs charged as development contributions relate to works that are required for growth as required by s106 of the Local Government Act 2002.
- 1.4 The Hastings District Council (HDC) change of focus towards investing in essential infrastructure needs in the 2024-34 Long Term Plan (LTP) is supported. Cost savings should be achieved by better planning, project management and efficiency.

Development Contribution Methodology Inconsistencies

- 1.5 Council has not followed an appropriate methodology in its draft 2024/25 development contributions policy when determining the value of proposed charges per HUE's in the 2024/2025 year.
- 1.6 Section 2.6.2 of the policy states "backlog and renewal portions of capital expenditure will be funded from sources other than development contributions". Section 3.3 of the policy includes that "any requirement to increase the level of service for existing users will not be funded by development contributions".

- 1.7 These policy statements are aligned with guidance produced by the Office of the Auditor General¹ which states:
- “Development contributions must be used for, or towards, the capital expenditure of the reserve, network infrastructure, or community infrastructure for which the contribution was required. **They cannot be used for the maintenance of the reserve, network infrastructure, or community infrastructure**”.*
- 1.8 Despite the above statements in the policy, the list of projects in the schedule contained in the development contributions policy clearly identify renewal projects, and attributes up to 100% of the cost of these projects to be covered by Development Contributions. For example, \$56.3 million worth of wastewater projects alone have “renewal or upgrade” in their name and yet state that 100% of the costs of these projects are attributable to growth. So while the policy purports to say the right things, that isn’t carried through to how costs are allocated and projects funded.
- 1.9 The proposed policy fails to take the benefit to the community of planned projects, particularly those projects that are planned to relieve current constraints within the wastewater network. When HDC consulted with the community last year² it included the following example in the current Development Contributions Policy:
- “The costs that make up development contributions are identified by assessing proposed infrastructure investments and determining what components or proportion of those investments are necessitated by or attributable to growth and which are not. Some investments are readily identifiable as being necessitable(sic) by growth where others are a mix of growth and non-growth. As an example, replacing an older sewer pipe and pump station would generally be a non-growth cost. However, upsizing the replacement infrastructure to provide additional capacity for growth would increase the costs of replacement. This cost increment can be attributed to growth.”*
- 1.10 Following the example in last years’ consultation document, development contribution are only to cover the cost to upsize infrastructure for provide capacity for future growth, not funding the entire projects as is proposed in the 2024-34 policy.
- 1.11 The Infrastructure Constraints report produced by HDC last year, identified many existing areas of Hastings where the wastewater network is currently constrained due to past intensification, asset deterioration and inflow and infiltration of stormwater and groundwater into the wastewater network. These all lead to these parts of the Hastings Wastewater Network needing to be upgraded to bring the wastewater level of service in these areas up to standard.
- 1.12 The same projects identified in the 2023 HDC Infrastructure Constraint report as being needed because of existing operational and maintenance issues or where the current level of service is not being met have been included in the development contribution schedule, stating that 100% of project costs are to be recovered from Development Contributions.

¹ Using development contributions and financial contributions to fund local authorities’ growth-related assets. Office of the Auditor General, 2013.

² Statement of Proposal: Long Term Plan Amendment – Dealing with Growth, Hastings District Council 2023. Page 12, Development Contributions Policy

- 1.13 By way of a further example, Section 3.36 of the HDC Infrastructure Constraints Report³, states that the Louie/Ada/Hood wastewater catchments have a *“need for significant upgrades to address LoS issues”*, and yet Council is attempting to cover 100% of the cost of this work using Development Contributions. This is only one of many projects that has costs incorrectly attributed to development contributions in the policy schedule.
- 1.14 The proposed policy is in breach of section 106 of the LGA which requires the Development contribution policy to:
- “...summarise and explain the total cost of capital expenditure identified in the long-term plan, or identified under clause 1(2) of Schedule 13 that the local authority expects to incur to meet the increased demand for community facilities resulting from growth;...”**
- 1.15 In 2014 the Local Government Act was amended to include Section 197AB. This section sets principles to be adhered to when developing the Development Contribution Policy required by section 106. The proposed policy is in breach of those principles.
- 1.16 The proposed policy is also contrary to the methodology for calculating Development Contributions in Schedule 13 Of the LGA.
- 1.17 The proposed policy also fails to meet HDC’s own requirement in the policy of “providing a consistent and equitable basis to recover the cost of capital expenditure to service growth in the Hastings District.”

Projects not included in the Long Term Plan (LTP)

- 1.18 Many of the projects listed in the Development Contributions Policy are identified in the period covered by the LTP. However, these projects themselves are not identified in the LTP document. This is despite the Local Government Act requiring HDC to demonstrate what development contributions are to be used for and relating those contributions to projects identified in the LTP⁴.
- 1.19 The consultation document for the LTP identified that increased levels of investment are required for each of the 3 waters activities in the LTP. As an example, capital expenditure on wastewater projects in the LTP shows Council is planning on spending \$77Million in the first year of the LTP on wastewater projects, but only assigns \$50.8Million of these costs to individual projects.
- 1.20 The Office of the Auditor General requires: *“Consultation documents should concisely and clearly present the significant issues, plans, and projects that councils intend to include in their LTPs. Key issues should be presented so that people can easily understand and respond to them.”*
- 1.21 How can the community understand and respond to issues when the projects proposed to resolve them are not even listed in the supporting information to the LTP consultation document?

³ Infrastructure Constraints Report, Hastings District Council, April 2023

⁴ See s106(2)(a)

Split of costs between Infill Developments and Greenfields

- 1.22 The consultation document for the LTP identifies that the intensification of housing means more stormwater that HDC's systems needs to cope with and states that investments are required to increase stormwater capacity.
- 1.23 Despite this, infill development in the proposed development contribution policy is exempt from paying for the cost of any stormwater upgrades, in addition to not paying a share for parks and reserves. This exemption does not meet the fair share criteria stated in the development contribution policy.
- 1.24 We agree with the need for investment to occur to increase stormwater capacity, however the cost for doing this needs to be attributed correctly.
- 1.25 Growth is not the only reason stormwater capacity in the Hastings District needs to be increased. HDC's current level of service whereby stormwater infrastructure is sized for a 1-in-5 year is too low. It is less than the level of service required under the Building Code. Drainage pipes on private properties that lead to the Council infrastructure must be sized to convey a 1-in-10 year storm, yet Hastings District Council only provide infrastructure sized for a smaller event. Given the impact of Cyclone Gabrielle and the need to build for resilience, Council must ensure that their levels of service are fit for purpose.

Retirement Units – Unfair Subsidy

- 1.26 Table 4.6.1 in the Development Contribution Policy charges only 0.33 of a HUE for each retirement village unit and 0.3 of a HUE for each aged care room in recognizing that occupancy of these units is less than an average household.
- 1.27 Appendix G of the policy states that Development Contributions are based on an average household occupancy of 2.7.
- 1.28 On the basis of the subsidy offered it appears that Council consider that each retirement unit and room is occupied by less than one person, highlighting the fact that the Development Contributions Policy is unfairly subsidising retirement units and rooms.

Resource Efficiencies and the need to Benchmark

- 1.29 Section 14(c) of the Local Government Act requires Council to ensure prudent stewardship and the efficient and effective use of resources in the interests of its district including by planning effectively for the future management of its assets.
- 1.30 The HDC 2023 Infrastructure constraints report identified that there is a significant amount of inflow and infiltration in the Hastings Wastewater network, that is stormwater runoff incorrectly flowing into the wastewater network, or groundwater infiltrating into the wastewater network.
- 1.31 The proposed programme of works doesn't address the root cause of inflow and infiltration causing capacity constraints in the wastewater network, and instead is focused on upsizing wastewater assets. Without addressing inflow and infiltration HDC will end up with oversized wastewater pipes, pump stations and treatment facilities, and associated

increased operational costs for pumping and treating water that shouldn't be in the wastewater network in the first place.

- 1.32 The prevention of inflow and infiltration getting into the wastewater network should be addressed first if HDC want to fulfil their strategic objective of "water and land sources used wisely".
- 1.33 While the Councils Strategic Objectives are commendable, and we agree with them, it is clear that these objectives are not driving the delivery of the capital works programmes or the resource efficiency of the Council.
- 1.34 For example, comparing the leakage rates from the drinking water network indicated in the HDC Infrastructure Constraints Report indicated that the drinking water network in Hastings loses 29% of water with an ILI of 5.74. This would place Hastings as the third worst council for leakage in New Zealand.
- 1.35 We recommend that HDC benchmark the performance of their infrastructure against other Councils, for instance by joining the Water New Zealand's National Performance Review. This would help to highlight the current inefficiencies in Hastings' infrastructure and identify areas where Council could become more efficient to reduce costs for Ratepayers.

Hourly Rates charged Exceed Reasonable Costs

- 1.36 The proposed hourly rates to be charged for building, engineering and planning applications are far too high. In particular, the proposed fees for building consent officers time of \$260-\$290 per hour far exceed a reasonable cost for this service.
- 1.37 In comparison, Auckland Council fee charges currently sit in a range from \$186 -\$219 per hour for building consent, depending on the particular staffs' level of competency. Closer to home, Napier City Council charges \$100 per hour for building administrators and \$200 per hour for Building Consent Officers.
- 1.38 Under section 150(4) of the Local Government Act local authorities can not recover more than the reasonable costs incurred by the local authority for which the fee is charged.
- 1.39 We are deeply concerned about the exorbitant rates being charged by HDC in this area and believe this is another area where Council should be benchmarking the rates that they charge against other Councils. Where these are substantially different, for instance with Building Consent officers, the efficiencies of those teams should be reviewed.

Conclusion

- 1.40 The Development Contribution policy is not fit for purpose. It does not meet the requirements of the LGA and is not in a form that can be adopted by Council.
- 1.41 The policy is contrary to the requirements of ss106 and 197AB and the requirements of schedule 13 of the Local Government Act 2002.
- 1.42 Development contributions are being used to fund upgrades of existing services that have been identified in the HDC 2023 Infrastructure Constraints Report. The need for those upgrades is not driven by growth.

- 1.43 While the desire to minimise the impact of infrastructure upgrades on ratepayers is understood, that does not mean that development contributions can be loaded with costs that do not relate to growth.
- 1.44 Cost savings should be made through better efficiency, better planning better contracting processes, better supervision, better accountability for project milestones and outcomes and better financial controls.
- 1.45 The issues facing Hastings District are substantial. Cyclone Gabrielle has added to those issues but can not be used as an excuse. The issues arising from poor town planning, poor infrastructure planning, inadequate maintenance and inefficiency all predate Cyclone Gabrielle.
- 1.46 Loading the cost of these shortcomings onto new development simply masks the problems. Not only is this unlawful. It is incredibly shortsighted.
- 1.47 Landsdale Developments Ltd wishes to be heard in support of its submission.



Phil Stickney

phil.stickney@developmentnous.nz

Signed as an agent on behalf Landsdale Developments Limited

27/05/2024

