

Annexure 12: 26-28 Victoria Street (Union Victoria Motel) – RC17673



Figure 1: 26-28 Victoria Street (as viewed from Victoria Street)

1 Introduction

1.1 Resource consent to use 26-28 Victoria Street for Contracted Emergency Housing (CEH) was lodged with Rotorua Lakes Council (RLC) on 20 August 2021. CEH is described in detail in the Application and in my Primary Evidence. To summarise, the Proposal is to:

- (a) Use 18 of the existing motel units for CEH, primarily for whānau with children and vulnerable individuals (such as elderly);
- (b) Use 2 units for the onsite Service Provider;
- (c) Provide on-site support services for CEH occupants by a dedicated Service Provider. The Service Provider is currently Visions of a Helping Hand Charitable Trust, but the Applicant would like to retain flexibility so that an alternative Service Provider could provide the necessary Support Services if required.
- (d) 24/7 security on-site and an on-call Senior Security Officer;
- (e) Operate CEH from the site for a maximum of five years (from the date of the decision of the consent);
- (f) Revert back to a motel activity once the site is no longer being used for CEH.

2 Changes to the Application since lodgement

Maximum Occupancy

- 2.1 Since the notification of the Application, the Applicant has revised the total maximum occupancy onsite, reducing this from 78 occupants to **56 occupants**.
- 2.2 CEH has been operating from the 26-28 Victoria Street since 1 July 2021. On 11 May 2022, Ministry of Housing and Urban Development (MHUD) provided to RLC (in response to a s92 request) updated information about the actual number of occupants on the site. This information demonstrated that the number of occupants is far lower than the theoretical capacity (of 78 people) if every bed in every unit was occupied. Updated actual occupancy is provided in Table 1 below.

Table 1: 26-27 Victoria Street - Actual Occupancy Units (U) and People (P) December 2021 – August 2022

Date	15/12/21		7/02/22		30/03/22		27/04/22		23/05/22		30/06/22		1/08/22		30/08/22	
	U	P	U	P	U	P	U	P	U	P	U	P	U	P	U	P
No.	19	40	16	46	11	31	12	31	8	25	8	20	14	37	15	40

NB: All 20 units are contracted for CEH and 26-28 Victoria Street has a maximum theoretical capacity of 78 CEH occupants.

- 2.3 The reality of CEH is that units are allocated to whānau based on their specific needs, and this does not necessarily mean every bed in every unit is occupied. As demonstrated in Table 1 above, the actual number of people onsite has varied between 20 and 46 people. While these levels are notably lower than the maximum occupancy of 56 persons that is now being sought by the Applicant, it is my understanding that reasons for low levels of occupation can vary – for example, on occasion, rooms are decommissioned for maintenance and repairs between whānau stays, and some rooms are set aside for emergency placements.
- 2.4 It is accepted that those staying in CEH are generally onsite longer than typical motel guests. As such, in terms of the potential intensity of use I consider that a reduced maximum occupancy is appropriate and helps to mitigate the potential effects that could result from overcrowding.

Site Fencing

- 2.5 The original fence along Malfroy Street has been replaced. A timber fence is located along the eastern side of road front boundary, with an aluminium fence sliding gates has been constructed along the western side of the boundary to allow vehicles to enter and exit the site. These are permanent structures.

3 Activity Status

Operative Rotorua District Plan

- 3.1 The subject site is located entirely within the Residential 2 Zone. All adjoining properties are also in the Residential 2 Zone. The land to the north is zoned City Centre 2 Zone.
- 3.2 As discussed in my Primary Evidence, the activity has been assessed as a Non-Complying Activity pursuant to Rule RESZ-R2.

4 Site Specific Matters raised in Submissions

- 4.1 The site specific s42A report by Ms Bennie provides an overview of the notification process and submissions raised. I note that many submitters made 'blanket' submissions which related to all Applications. As such, where the issues raised in submissions are relevant to all Applications, I have considered these issues in my Primary Evidence.
- 4.2 There were 312 submissions in relation to the resource consent at 26-28 Victoria Street for CEH (including 16 submissions that were provided to the Independent Hearing Panel prior to notification of the application). Six submissions are not considered blanket submissions and were more specific to 26-28 Victoria Street. One submission is in support, one is opposed in part, and the remaining 4 are in opposition of the Proposal. Five submitters are owners or residents of adjacent properties, while the sixth is a local resident.¹
- 4.3 The issues raised by submissions are reasonably generic, and can be broadly categorised as follows:

¹ It is noted that this submitter put their address and contact details as Accolade Lodge Motel. As noted in the s42A report, this motel has been identified operating as an uncontracted emergency housing provider. I agree with Ms Bennie's assessment that this submission may be a trade competitor and if this is the case, this submission must be disregarded in accordance with Section 104(3)(a)(i) of the RMA.

- (a) Social Effects
- (b) Tourism Effects
- (c) Cumulative Effects
- (d) Property Values
- (e) External Amenity Effects
- (f) Internal Amenity Effects

4.4 Submissions relating to social effects, tourism effects, property values and community cohesion have been addressed in my Primary Evidence and that of MHUD's experts. No further discussion will be undertaken regarding these issues here. Further, changes to the application since lodgement (discussed in Section 2 above) together with conditions of consent will effectively mitigate submitter's concerns at the site-based level.

4.5 Cumulative effects have also been discussed in my Primary Evidence; however, I provide additional comments specific to the site at 26-28 Victoria Street in my effects assessment below.

4.6 External and internal effects specific to the site are not addressed in my Primary Evidence. These are discussed in my effects assessment below.

4.7 Overall, I agree with the analysis and conclusions within Ms Bennie's s42A report with regard to submissions received on this property.

5 Assessment of Effects

5.1 My Primary Evidence discusses effects as they relate to all Applications. The following discusses effects specifically relevant to this site:

- (a) Positive effects
- (b) Character and amenity effects
 - (i) External amenity
 - (ii) Internal amenity
- (c) Transportation Effects

- (i) Parking and access
- (ii) Traffic generation
- (d) Noise Effects
 - (i) Noise from emergency housing
- (e) Infrastructure effects
- (f) Financial contributions

Positive effects

- 5.2 The positive effects of the Proposal are outlined in the Application and in my Primary Evidence. From a site-specific focus, the site is very well located in relation to community amenities, including broader recreation opportunities and schools.

Character and amenity effects

External Amenity - Streetscape / neighbourhood character

- 5.3 No changes are proposed in relation to the buildings and the AEE relevant to the site remains valid in this regard.
- 5.4 As noted in Ms Bennie's 42A report, the buildings and onsite features within the site generally reflect the surrounding residential character, which aligns with its location within a wider residential neighbourhood. In this regard, Ms Bennie has recommended conditions of consent to enhance the site's interface with the public realm, including removal of motel related signage and measures to ensure that existing landscaping will be maintained and replaced where necessary. I agree that such measures are appropriate to maintain a positive interface with, and appearance from, the street.
- 5.5 Overall, I agree with Ms Bennie's conclusion that subject to existing external boundary treatments and landscaping features being properly maintained, the resulting landscape and visual effects are acceptable, and generally consistent with the character and amenity outcomes anticipated by the zone.
- 5.6 In addition to the above, a number of experts of the Council and MHUD have recommended that all online advertising and websites that promote

tourist accommodation and other services should be removed. I agree that such measures are generally appropriate.

- 5.7 It is understood that a matter raised in a submission regarding regulation of the geothermal pressure has since been resolved by the Motel Operator.

External Amenity – Cumulative effects

- 5.8 Cumulative effects of 13 resource consents being considered concurrently is discussed in my Primary Evidence. This was also addressed in the s92 response, the Social Impact Assessment, and in the Evidence of Ms Healy and Mr Eaqub.

- 5.9 Specific to the site at 26-28 Victoria Street, I note that while there are no other CEH facilities adjoining the site, the adjacent site to the west (30 Victoria Street) is understood to provide EHSNG accommodation. As identified in Figure 2 of the site specific s42A report, there are also several tourist accommodation sites in immediate proximity to the site. With the exception of the adjacent site to the west these other motels are not known to provide emergency housing of any description. The onsite activities will be confined within the site and onsite management will minimise any external effects; at an individual site based level, the proposed use of the motel for CEH purposes will not significantly contribute to cumulative effects.

- 5.10 The improvement to fencing and proposed removal of motel signage will assist in reducing any ambiguity around the nature of onsite activities, and will help the site integrate more into the residential environment in which it is located.

- 5.11 My conclusion in relation to cumulative effects in my Primary Evidence are equally applicable here. Cumulative effects of the Proposal are considered to be acceptable and with the implementation of proposed management and mitigation measures, are considered to be no more than minor.

Internal Amenity

- 5.12 Internal amenity relates to the quality of the onsite living environment for those staying in CEH, including access to onsite amenities typically associated with domestic living, open space and onsite services.

- 5.13 My Primary Evidence discusses how individuals are allocated to particular units, which among other matters, includes consideration of a unit's size, location, and onsite amenities to suit the requirements of the whānau or individual being homed.
- 5.14 Residents within CEH are accommodated on a relatively short-term basis (when compared with more permanent housing), with the length of stay varying between whānau groups. It is acknowledged, however, that the duration of stay is for a longer period than individuals who previously utilised the accommodation as motel guests. The provision of a quality and safe living environment is an important objective of CEH.
- 5.15 In undertaking this effects assessment, I also draw on the guiding principles within the relevant planning provisions applicable to the Residential 2 Zone. In this regard, I note that the introduction statement of the zone explicitly describes that the RESZ2 area as being characterised by *"...a mix of single storey and two-storey apartment style living, with limited outdoor space. The built environment is dominant and much of the space around buildings is taken up by hard surfacing for car parking and turning. There are few trees and shrubs that make an impact on the wider area and the zone is more reliant on the street trees to soften the built environment."*² In the context of this statement, the RESZ2 zone requires a minimum of 10% of the net site area to be provided as outdoor recreation and amenity space, which can be divided between each dwelling³. This provides a helpful starting point in which to consider adequacy of open space; however, this must also be considered in the context that this standard is particularly applicable to site development resulting in permanent places of residence, as opposed to repurposed accommodation that instead serves as a temporary place of residence to the occupants.

Internal Amenity – Outdoor living space

- 5.16 Access to onsite amenity is one element that can contribute to a high-quality living environment. In my opinion, the extent and quality of the onsite amenity (including provision of open space) must be considered within the context of CEH providing a short-term place of residence for members of the community who otherwise have no tenable or better alternative accommodation.

² Rotorua District Plan, Part 3 Area-Specific Matters, Residential Zones, Introduction.

³ RESZ-S3(6)(a).

- 5.17 I agree with the site specific s42A report, which identifies that access to private outdoor living space and shared open space is limited within this site. Units 1-2 and the Managers unit have direct access to usable open space, but other units are limited in this regard. I agree with Ms Bennie's findings that there is further opportunity to enhance the useability of the shared open space at Unit 1 and 2, and improve the lawn area along the southern boundary (even if this area is not directly accessible as usable open space from the adjacent units). Ms Bennie also recommends the repurposing of space at the Union Street entrance from carparking to shared open space, which I support. I therefore agree with the recommended conditions within the s42A report to enhance the site's open space, which includes the fencing of any unsafe areas (i.e. around the geothermal pressure pipe.)
- 5.18 Although the provision of outdoor living space is minimal, in my opinion, the temporary nature of the residential accommodation is a mitigating factor. Internal amenity can be further enhanced by the measures outlined above and improved site maintenance.

Internal Amenity – Suitability for children

- 5.19 I agree that the open space areas near Unit 1 and Unit 2 would benefit from fencing, to improve the functionality and safety of these areas for younger children. I further note that the site is well located within an easy walking distance to local recreation grounds (including Rotorua Community Youth Centre) and schools, which provide considerable amenity and space for children to play, albeit off the site. In my experience, it is commonplace for local residents to use school grounds for informal recreation and play purposes, and in my opinion this nearby public space can readily mitigate any onsite deficiencies.
- 5.20 The s42A report, informed by Ms Collins's assessment, recommends restrictions on the use of units to accommodate whānau with children, or certain age-groups from particular units. In my opinion, such restrictions, while well intended, are misplaced in the context of a community experiencing a significant housing crisis. I acknowledge the evidence that access to play space and more extensive physical living environments are contributors to a child's wellbeing and can aid in a child's developmental process. However, I consider access to a warm, safe, and stable accommodation are overriding factors to achieving the same essential

outcomes. In my opinion, restricting whānau with children from occupying studio units, or limiting children of certain age groups from particular units, is likely to result in perverse outcomes, which ultimately would translate to whānau being unable to access CEH accommodation. In forming this conclusion, I note that the wellbeing of tamariki (through the process of undertaking an individual needs based assessment of each whānau) is at the forefront in any decision making around placement into suitable living environments.

- 5.21 Overall, it is my opinion that the site is adequately suited to accommodating children. I do not support conditions 8-12 recommended in the s42A report.

Occupancy rate

- 5.22 Ms Bennie recommends that the proposed maximum occupancy rate for the site be restricted to 44 occupants. Maximum occupancy rates per unit type (excluding children under the age of six months) are also recommended. These recommendations are carried through to conditions 7-13 of the s42A report. The proposed limits on occupancy rates attempts to mitigate concerns of overcrowding and is based on the Canadian National Occupancy Standard (CNOS) used by Statistics New Zealand.
- 5.23 My Primary Evidence discusses why the CNOS is not appropriate as applied to CEH. In my opinion, the service provider is best placed to determine which rooms are most suitable for occupants, and they consider a multitude of factors including family dynamics.
- 5.24 Considering first the occupancy levels of the wider site, as noted in the s42A report, the Applicant has offered a reduction in the maximum occupancy numbers to a **maximum of 56 occupants**, which is an additional 12 people above that recommended by the Council's s42A report. Informed by the advice of Mr Wilson, I support the maximum level of 56 persons, and consider that it is appropriate to enable additional flexibility over and above what is proposed by the Council, in recognition that on occasion, the placement of whānau groups may require some occasional exceedance to the more restrictive operating limit proposed in the Council's conditions.
- 5.25 As noted above, I do not agree that it is necessary to limit the individual occupancy levels of specific units, or apply restrictions to accommodate young children. In my opinion, while such restrictions are well-intended, I do not consider that these are necessary to achieve the worthy objective of

avoiding overcrowding. The Service Providers are skilled at ensuring the wellbeing of whānau and tamariki are at the forefront of determining appropriate allocation of accommodation.

- 5.26 Ms Bennie identifies that should the Panel be of the mind to grant consent and impose the occupancy conditions stated in the s42A report, some families may currently be accommodated in units that would no longer meet the recommended occupancy rates. If this is the case, it is requested that the options presented in paragraph 88 of the s42A report also be imposed. This will ensure that those currently occupying the site are able to retain their place of accommodation until a suitable long-term option is found.

CPTED principles

- 5.27 The overview s42A report briefly notes that it would be helpful to better understand the application of the National Guidelines for Crime Prevention through Environmental Design (CPTED) in the context of each site. Such an assessment has not yet been undertaken; however, a condition of consent requiring a CPTED audit be undertaken based on the principles of CPTED could be imposed in the decision of this consent if the Panel considered this was necessary. In my opinion, any recommendations of a subsequent CPTED audit could then inform a site-specific action and implementation plan that can be incorporated into the Site Management Plan.

Transportation Effects

- 5.28 I agree with and accept the s42A analysis with regard to transportation effects and the inclusion of Condition 22.

Noise Effects

- 5.29 I agree with and accept the s42A analysis with regard to noise effects, including reverse sensitivity and noise from emergency housing. As outlined in my Primary Evidence, I do not agree with including permitted activity standards as conditions (i.e. s42A report site specific Condition 30 to 33).

Effects on Infrastructure

- 5.30 I agree with and accept the s42A analysis with regard to effects on infrastructure.

Financial contributions

- 5.31 I agree with and accept the s42A analysis with regard to financial contributions.

6 Relevant Planning Framework

- 6.1 The higher order planning framework is discussed in my Primary Evidence. Below I will discuss the ODP in the context of 26-28 Victoria Street where there are particular matters that are distinct from my assessment in my Primary Evidence.

Operative District Plan (ODP) Zone and CEH

- 6.2 The site is located entirely within the Residential 2 Zone (RESZ2 Zone). The Residential 2 zone is described in the ODP as:

“Medium density residential areas located close to the city centre. There is a mix of single storey and two-storey apartment style living, with limited outdoor space. The built environment is dominant and much of the space around buildings is taken up by hard surfacing for car parking and turning. There are few trees and shrubs that make an impact on the wider area and the zone is more reliant on the street trees to soften the built environment.”

- 6.3 The site and onsite activities generally align with this zone description. There are no modifications proposed to the buildings or structures themselves, except fencing around specific areas of open space to enhance the use and amenity of these areas. Access to individual open space is generally limited. As previously noted, the onsite motel signage will be removed, and fence upgrades have recently occurred. The site is fully fenced on all boundaries, and it is proposed to retain existing vegetation.
- 6.4 As discussed elsewhere, the Proposal includes the reversion back to traditional ‘tourist accommodation⁴’ in the future (which will likely include reinstatement of motel signage).
- 6.5 The assessment below considers the Proposal against the relevant provisions of the operative District Plan. I note that there is broad

⁴ ODP definition of ‘Tourist accommodation’ (page 35 Part 1 of ODP).

agreement between the conclusions reached by Ms Bennie in the s42A report, and my assessment below.

- 6.6 **RESZ-O1** outlines the anticipated design and onsite amenity outcomes, including site design and unit orientation, placement of open space areas, design of parking and vehicle manoeuvring areas, and ability to achieve a safe street through passive surveillance. Relevant supporting policies are **RESZ-P1 to RESZ-P5**.
- 6.7 I agree with Ms Bennie's assessment that the consideration against these provisions is best framed in the context of considering the amenity outcomes through a change in onsite activities, as there are no physical changes to the existing buildings. In accordance with the s42A recommendations, I support some small site-specific improvements to open space areas (by way of fencing) and reallocation of some parking area to shared open space, but otherwise I acknowledge that there will be limited revisions in the site design and placement of open space areas. Onsite parking and manoeuvring areas are sufficient.
- 6.8 Overall, I find that the Proposal is consistent with the general outcomes sought by this objective and related policies, but I acknowledge that there is some misalignment due to the sites limitations in providing high quality open space for each unit. In my opinion, while the open space areas are limited, they are sufficient to serve the needs of residents located within temporary accommodation – particularly when considered in the context of the site's proximity to other nearby amenities.
- 6.9 Objective **RESZ-O2** requires character and amenity values of the zone to be maintained and enhanced. This objective is supported by **RESZ-P8**, which articulates the character and amenity outcomes anticipated in the zone. No changes are proposed to the existing buildings and the existing onsite vegetation is proposed to be retained. Along with the existing street trees located around the site's perimeter, I consider landscaping will continue to provide a degree of "softening" of the site's built environment.
- 6.10 The Motel Operator has advised that a gardener attends the maintenance of the site grounds regularly, ensuring the streetscape remains attractive. The required removal of the motel sign will also enhance the site's presentation and its assimilation into the surrounding residential environment. Overall, it is my opinion that the site reflects the character

outcomes anticipated in the RESZ 2 Zone and the onsite activities do not diminish this.

- 6.11 Objective **RESZ-O3** requires non-residential activities to be of a scale and character that can be readily absorbed into the residential environment, while also ensuring the vitality of the primary commercial centres is maintained. This objective is supported by Policies **RESZ-P12, RESZ-P13, RESZ-P14, and RESZ-16**.
- 6.12 The CEH activities are largely akin to residential activities, noting that the onsite support services offered by the Service Provider are ancillary to this and could be constituted to be a non-residential activity. The onsite support services are not an obvious feature of the activities from an external perspective, being largely operated out of two units within the site. The support-services are an integral component of CEH and enhance the onsite operation and wellbeing of residents within the site. Moreover, the support-services provide the framework and social scaffolding to enable residents to live in a supported and safe environment. The onsite support services contribute positively to both the residents, and the wider site operations, and assist in minimising the effects on the surrounding environment. In my opinion, the Proposal is consistent with this objective and related policies.
- 6.13 Objective **RESZ-O6** relates to the design, layout, and appearance of residential sites. The outcome sought is the promotion and maintenance of the character of the zone, onsite residential amenity, and community safety. This objective is supported by **RESZ-P20**, which guides development and site design to achieve positive onsite amenity outcomes and **RESZ-P21**, which seeks to ensure the interface between the site and the street is well considered to enable passive surveillance. As discussed elsewhere, the site reflects the anticipated character of the zone. With regard to amenity, based on orientation and location within the site, each unit receives adequate sunlight. I agree with the recommendations of Ms Bennie that improvements can be made to onsite open space, such as fencing of the open space at Units 1 and 2 and converting some carparks to shared open space near the site's Union Street entrance. All of these measures will improve onsite amenity outcomes. The site's interface with public spaces is generally positive and provides opportunity for passive surveillance. The Proposal is considered to be generally consistent with these provisions.

- 6.14 With regard to the District Plan provisions relating to Noise, Infrastructure and Transport, I agree that those identified in the s42A report are relevant and agree with the conclusions reached by Ms Bennie in relation to these provisions.
- 6.15 Overall, I consider the Proposal is broadly consistent with the majority of the relevant objectives and policies of the District Plan. I accept some inconsistencies with the provisions encouraging the provision of quality onsite open space. In this regard, it is my opinion this shortcoming is acceptable in the context of the relatively short-term nature of the accommodation (compared with permanent housing) and the proximity of the site to nearby recreational grounds and activities.

7 Response to s42A Report's Recommended Conditions of Consent

- 7.1 Appendix 1 of the site specific s42A Report for 26-28 Victoria Street contains draft conditions of consent recommended by Ms Bennie. There is broad agreement around the majority of proposed conditions. The discussion below focuses more specifically upon conditions where I suggest changes or explicitly disagree with those recommended in the s42A report. The Strategic Conditions in the overview s42A report have been discussed in my Primary Evidence.
- 7.2 An updated set of proposed consent conditions will be provided at the commencement of the hearing, and it is anticipated that these will develop over the course of the hearing. In the meantime, I provide the following overall comments on the recommended consent conditions attached to the Council's s42A site specific report.
- 7.3 **Conditions 2 and 3** identify the consent holder as the Operator and MHUD and restrict the consent from being transferred to and held by any other person. I do not agree with this restriction and have addressed this in my Primary Evidence.
- 7.4 **Condition 7** restricts site occupancy to a maximum of 44 persons (excluding children under six months of age). For the reasons outlined in Section 5 above outlines my view that the Service Provider is best placed to determine which rooms are most suitable for occupants, and they consider a variety of factors including family dynamics.

- 7.5 **Conditions 8-12** limit the placement of children (in the case of Condition 8, restrict the accommodation of young children under the age of 7 in entirety) and specify maximum occupancy levels (excluding children under six months of age). I do not support the placement of these conditions and recommend their deletion. I accept that a revised condition (9) requiring fencing of the open space area around Units 1 and 2 is appropriate, noting such improvement to the open space will improve the living environment for whānau with young children.
- 7.6 **Condition 13** provides clarification that the occupancy levels do not limit the length of stay for residents accommodated in the units, and also does not limit the number of people residing in Manager's Accommodation. I recommend that this is instead reframed as an Advice Note under the condition controlling the maximum site occupancy (condition 7). Further to this, if the panel is of the mind to grant consent and impose the maximum number of occupants as stated in the s42A report, it is requested that the options presented in paragraph 90 of the s42A report also be imposed. This will ensure that those currently occupying the site are able to retain their place of accommodation until a suitable long-term option is found.
- 7.7 **Conditions 16 to 22** relate to retention/enhancement of landscaping, and improvements to open space areas throughout the site. I agree with the placement of these conditions.
- 7.8 **Condition 23** requires that physical motel signage be removed for the duration of the consent. I agree that this is reasonable.
- 7.9 **Condition 24** requires that all online advertising and websites that promote tourist accommodation and other services be removed. The implementation of this condition is difficult due to the nature of online advertising. Notwithstanding this, it is reasonable to require the Motel Operator to amend their website and booking websites to show no room availability and on this basis I agree that a condition to this effect is reasonable.
- 7.10 **Conditions 30 to 34** require compliance with the permitted activity performance standards for noise and light emissions from the site. I do not consider placement of conditions, that simply replicate permitted activity standards, to be in accordance with good practice, and nor do I consider their placement necessary. I recommend deletion of these conditions.

7.11 **Conditions 37 to 41** relate to the taking of a bond. This matter has been discussed within my Primary Evidence, where I dispute the need for a bond, and also the value of the individual bond. I recommend deletion of these conditions.

8 Section 104D Gateway Test and Part 2 Analysis

8.1 As discussed in my Primary Evidence, it is my opinion that the effects of the Proposal are no more than minor and the Proposal is not contrary to the objectives and policies of the Rotorua District Plan or Plan Change 9.

8.2 As detailed in my Primary Evidence, the Proposal aligns with Part 2 of the Act.

Date: 5 October 2022



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Alice Blackwell