

**BEFORE THE COMMISSIONERS APPOINTED BY THE
DUNEDIN CITY COUNCIL**

Under	the Resource Management Act 1991 (RMA)
In the matter of	Subdivision and Land Use Resource Consent Application at 140 Three Mile Hill Road, Dunedin
	SUB-2021-75 and LUC-2021-247
Applicants	A Nailard and V Cullen

Brief of Evidence of Emma Jane Spalding for A Nailard and V Cullen

19 October 2021

Qualifications and experience

- 1 My name is Emma Jane Spalding.
- 2 I am employed by 4Sight Consulting Limited in Dunedin as a Senior Planning and Policy Consultant.
- 3 I am a qualified and experienced environmental planner and I hold the Degree of Master of Regional and Resource Planning from Otago University, with Distinction. I am an Intermediate Member of the New Zealand Planning Institute. I have over ten years of professional experience in the field of Resource Management Planning and I am responsible for the provision of consulting services in resource management and planning to a range of public and private clients including territorial authorities.
- 4 Since January 2019 I have provided consultant planning assistance to the Dunedin City Council processing resource consent applications of varying scale and complexity. I have also been involved in preparing numerous subdivision and land use consent applications for a range of private clients.
- 5 I was responsible for the preparation of the application dated 10 May 2021 for subdivision and land use consent ('the application') on behalf of Andy Nailard and Vicki Cullen ('the applicant'). I have been engaged by the applicant to prepare this evidence.
- 6 Although not necessary for a Council-level hearing, I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence has been prepared in accordance with it and I agree to comply with it. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of evidence

- 7 My evidence builds upon the application including the assessment of environmental effects, and is structured as follows:
 - (a) Executive summary
 - (b) Proposal overview
 - (c) Submissions
 - (d) District Plan assessment
 - (e) Regional Policy Statement assessment

- (f) Assessment of environmental effects
 - (i) Landscape, amenity, character and visual effects
 - (ii) Transportation
 - (iii) Infrastructure
 - (iv) Noise and glare
 - (v) Hazards
 - (vi) Productive rural activities and lot shape
 - (vii) Biodiversity
 - (viii) Manawhenua, cumulative effects and positive effects
- (g) Proposed consent conditions
- (h) Part 2 RMA
- (i) Section 104 and 104D RMA
- (j) Conclusion

Executive summary

- 8 The site is zoned Rural Residential 1 under the Proposed Second Generation District Plan ('2GP').
- 9 I agree with Council's consultant planner (Mr Buxton) in regards to his identification of the reasons for consent and activity status under the 2GP. Both the subdivision and land use resource consent applications are non-complying activities.
- 10 The relevant zoning and rules of the 2GP have not been appealed, therefore the 2006 District Plan rules that apply to this activity are inoperative (in accordance with Section 86F of the Resource Management Act 1991) and have not been assessed. The relevant provisions of the 2GP therefore have full legal effect.
- 11 The application was submitted for processing on 11 May 2021 and was notified on a limited basis on 16 August 2021 to two adjoining properties, for reasons relating solely to amenity effects created by additional traffic movements.
- 12 The period for lodging submissions closed on 14 September 2021, and two submissions in opposition were received.

- 13 The two submissions raised several issues, including plan integrity, landscaping, visual amenity and character, minimum lot size and rural productivity, traffic safety, amenity, noise and glare, contamination, effects on wildlife/rock wall, and infrastructure.
- 14 With regard to the relevant 2GP provisions, I consider that the proposal is consistent with the objectives and policies of the Rural Residential 1 zone. In particular, the proposal is consistent with objectives and policies which seek to ensure rural residential activity can occur in appropriate locations, at a density that enables productive use of lifestyle blocks and hobby farms, while maintaining a good level of amenity for residential activities on adjoining sites and the overall character and amenity of the zone.
- 15 My assessment of both the Partially Operative Regional Policy Statement 2019 and the Proposed Regional Policy Statement 2021 concludes that the proposal is consistent with and not contrary to the relevant provisions.
- 16 My opinion is that the proposal does not represent a challenge to the 2GP's integrity and granting of this consent will not create an undesirable precedent.
- 17 My assessment illustrates that any adverse effects will be less than minor, and comparable to what could be reasonably expected under the permitted baseline.
- 18 As a non-complying activity, s104D of the RMA applies. In my assessment, the activity passes both 'limbs' of the gateway test of s104D, with the effects being no more than minor, and the proposal being consistent with and not contrary to the objectives and policies of the 2GP. Therefore, consideration can be given to the granting of consent.
- 19 I concur with the recommendation of Mr Buxton that the resource consent should be granted, subject to conditions. I have read the draft conditions of consent prepared by Mr Buxton and consider the conditions are appropriate; will ensure efficient implementation of the consent, and will appropriately manage adverse effects in accordance with s108AA of the RMA.

Proposal Overview

- 20 The proposal involves a joint subdivision and land-use consent on the site at 140 Three Mile Hill Road, Dunedin.
- 21 The subdivision involves subdividing the 3.87ha subject site into two rural-residential allotments. Lot 1 will have an area of 2ha, while Lot 2 will have an area of 1.87ha.
- 22 The land use consent involves the establishment of residential activity on the resultant lots within approved building platforms.

- 23 The application also includes several conditions of consent offered by the applicant, as recommended by Mr Mike Moore, the applicant's landscape architect. These conditions relate to provision of landscape screening, limiting the height of buildings on the site, locating the dwellings within identified building platforms, and retaining the rural character of the driveway. The applicant has also offered a condition of consent that a consent notice be registered on the record of titles for the resultant allotments to prevent the future development of 'family flats' on the sites.

Submissions

- 24 The application was submitted to the Dunedin City Council on 11 May 2021 and was notified on a limited basis on 16 August 2021 to the following parties:

- (a) M Rietveld and N Hannah-Rietveld – 136 Three Mile Hill Road; and
- (b) J Moody and H Moody – 138 Three Mile Hill Road.

- 25 The reasoning provided by Mr Buxton for notifying the above parties was due to amenity effects related to increased traffic movements, as set out on page 11 of the s95 notification report, where he noted that:

"In terms of amenity, I consider that any adverse effect from an additional 8 vehicle movements per day will be less than minor on adjoining properties, other than 138 and 138 Three Mile Hill Road... while the adverse effects of additional traffic on these two properties is considered to be minor, I am not convinced that the effects will be less than minor".

- 26 Effects on adjacent properties relating to visual amenity, traffic safety and rural productivity were determined to be less than minor.
- 27 The submission period ended on 14 September 2021 and two submissions were received, both in opposition and both wishing to be heard.
- 28 The name of each submitter and a summary of their submission is outlined at paragraph 27 of Mr Buxton's s42A report. Full copies of the submissions are provided at pages 95-124 of the Hearings Committee Agenda.
- 29 The submissions broadly relate to concerns regarding the following topics:
- (a) Plan integrity
 - (b) Landscaping, visual amenity and character
 - (c) Minimum lot size and rural productivity
 - (d) Traffic safety

- (e) Amenity, noise and glare
- (f) HAIL
- (g) Effects on wildlife/rock wall
- (h) Infrastructure

30 I address matters raised by submitters throughout my evidence to follow.

District Plan Assessment of Proposal

31 Dunedin currently has two district plans: the Operative Dunedin City District Plan (the Operative Plan), and the Proposed Second Generation Dunedin City District Plan (the 2GP). The 2GP was notified on 26 September 2015, and the rules had legal effect as of 7 November 2018. Some aspects of the 2GP currently remain subject to appeal. All of the provisions in the 2GP which are relevant to this proposal are not subject to appeal and are therefore deemed operative.

2GP Objectives and Policies

32 I concur with Mr Buxton's assessment that the proposal is consistent with the objectives and policies of the 2GP relating to the Rural Residential 1 Zone, Transport, Public Health and Safety and Manawhenua.

33 Of most relevance are those provisions contained within the Rural Residential section of the 2GP:

- (a) Objective 17.2.1 and supporting policy 17.2.1.2 which seek to enable lifestyle blocks, hobby farms and associated residential activities in this zone, and require a density which enables lifestyle blocks and hobby farms.
- (b) Objective 17.2.2 and supporting policies 17.2.2.1, 17.2.2.3 and 17.2.2.8, which seek to minimise conflict and reverse sensitivity through the use of boundary setbacks and shape requirements.
- (c) Objective 17.2.3 and supporting policies 17.2.3.1 and 17.2.3.5 which seek to ensure the character and amenity of the rural residential zones are maintained.
- (d) Objective 17.2.4 and supporting policy 17.2.4.3 which seek to maintain the productive potential of the rural residential zones for lifestyle blocks or hobby farms, and avoid use purely as large lot residential living.

34 Section 7.3.3 of the application (page 57-58 of the agenda) contains my assessment of the above provisions. Overall, I consider that the proposal is consistent with the above objectives and policies of the Rural Residential 1 zone.

In particular, I note that the subject site is an appropriate location for the proposed rural residential activity to occur, as it is within an established cluster of rural-residential sites of a similar scale to the proposed lots.

- 35 The proposed conditions of consent will ensure that a good level of amenity for residential activities on adjoining sites and the overall character and amenity of the zone will be maintained.
- 36 Proposed Lot 1 complies with the 2ha minimum lot size requirement. Proposed Lot 2 will be slightly below the minimum required, at 1.87ha, however will be larger than some other rural residential properties within the cluster. The site sizes proposed are large enough to enable productive use of the site for two lifestyle blocks/hobby farms and I do not consider that the scale of the resultant lots are purely 'large lot residential'. I note the 2GP 'Large Lot Residential' zones have minimum site sizes of 2000m² and 3500m², whereas proposed Lot 2 will have a site area of 18,700m².
- 37 Recent case law has noted that objectives and policies should be applied according to their tenor (*Rogers v Christchurch City Council*, [2019] NZEnvC 119). It is my opinion that the tenor of the Rural Residential Zone provisions is to enable rural-residential activity to occur, where this can be done in a way that maintains the character and amenity of the zone and at a scale consistent with lifestyle blocks or hobby farming, as opposed to large lot residential. The proposed development is entirely consistent with this intention.

2GP Strategic Directions

- 38 Rule 17.12.6.5 of the 2GP provides assessment guidance for non-complying activities in the Rural Residential 1 zone, relating to minimum site size performance standard breaches. In addition to the objectives and policies of the Rural Residential 1 zone, the priority considerations also include strategic directions Objective 2.2.4 and Objective 2.6.1 (related to urban expansion and housing choice).
- 39 Objective 2.2.4 states that "*Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion. Urban expansion only occurs if required and in the most appropriate form and locations.*"
- 40 Objective 2.6.1 states that "*There is a range of housing choices in Dunedin that provides for the community's needs and supports social well-being*".
- 41 I consider that the proposal is consistent with the strategic direction objectives above, as the site has recently been re-zoned for rural-residential development and is considered to be an appropriate location for the proposal to occur. The provision of an additional site at this locality will provide for housing choice in the form of a rural residential living opportunity, while appropriately managing adverse effects.

- 42 I agree with the conclusion of Mr Buxton that the proposed subdivision will not provide for residential activity that is fundamentally different to the type anticipated by the rural residential zoning, and is not urban-scale living.

Summary

- 43 Overall, having regard to the relevant objectives and policies individually, and together as a policy framework, it is my opinion that the proposal is consistent with and not contrary to the provisions in the 2GP. The proposal meets the intention of the Rural Residential 1 zone and the Strategic Directions.

Regional Policy Statement Assessment of Proposal

Proposed RPS 2021

- 44 The proposal is considered to be consistent with the proposed RPS 2021, in particular, Objective UFD-O4 which seeks to ensure development in Otago's rural areas occurs in a way that only provides for rural lifestyle and rural residential development in locations identified through strategic planning or zoned within district plans as suitable for such development.
- 45 As the site's zoning was changed to Rural-Residential 1 by the 2GP, the development of this site for rural residential purposes is entirely appropriate and consistent with the proposed RPS 2021.

RPS 2019

- 46 Similarly, the RPS 2019 contains Objective 4.5 which seeks to ensure development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments.
- 47 As the site was recently re-zoned Rural Residential 1, the proposal to develop the site for rural-residential use is considered to be consistent with the 2GP's strategic and coordinated plan to provide for rural-residential activity at this location.

Assessment of Environmental Effects

Landscape, amenity, character and visual effects

- 48 As noted in the application documents, the subject site is within a cluster of rural residential zoned properties, with lot sizes ranging from 1.6ha to 3.87ha. The proposed subdivision creates two lots with areas of 2.0ha and 1.87ha. Proposed Lot 1 complies with the minimum site size of 2ha, while proposed Lot 2 (1.87ha) does not diverge significantly from the minimum site size of 2ha. Further, given the receiving environment contains similar sized (and smaller) sites than what is proposed, the subdivision is considered to be consistent with the existing

environment and development in the immediate vicinity. Overall, I consider that the proposal is in keeping with the existing rural-residential character of the area.

- 49 My conclusion is further supported by the Landscape Assessment prepared by Mr Moore, which formed part of the application. Mr Moore's assessment concludes as follows:

"My assessment of visual amenity effects on users of the adjacent Three Mile Hill Road and on adjacent residents, concludes that considering the permitted baseline and the proposed development controls, effects of the proposed development will be no more than adverse / very low (less than minor), and will in some cases, be positive. In terms of landscape character, I find that the development will have effects that are no more than adverse / very low (less than minor), and will integrate readily. I consider that the proposed subdivision is consistent with the DCDP objectives and policies relevant to this site and landscape and visual effects."

- 50 Based on the expert landscape assessment undertaken by Mr Moore, I consider that the proposed subdivision and future residential use of the new lots will have less than minor adverse effects on adjacent sites and the wider environment.

- 51 I note that the application was reviewed by Council's landscape architect, who agreed with the assessment undertaken by Mr Moore.

- 52 Both Mr Moore and Council's landscape architect agree that any potential adverse visual amenity and landscape character effects can be kept to low levels, particularly given the proposed mitigation measures offered by the applicant, including limiting the height of any buildings to 7m, retention of existing mature trees on site and additional landscape planting to provide screening along site boundaries.

- 53 The permitted baseline is of particular relevance to landscape effects, and I concur with Mr Buxton's assessment at paragraph 42 of his s42A report, which notes that under the 2GP a 10m high dwelling could be constructed on this site, and non-residential buildings could be constructed closer to the site boundaries. I agree with Mr Buxton's conclusion that *"based on what could be built as of right, the neighbouring properties cannot expect that their existing views will be retained, regardless of this proposal"*.

- 54 While neighbouring properties have enjoyed the benefit of locating next to a vacant site in the past, there is nothing preventing the development of this site in line with the permitted baseline, which essentially enables the lot to be developed in a way which may have greater visual effects than the smaller scale buildings proposed.

- 55 Finally, the applicant agrees to the condition proposed by Mr Buxton that any landscape planting should be undertaken as a requirement of the subdivision

consent, to ensure the planting is well established as soon as possible. This landscaping will be maintained in accordance with the planting maintenance and management regime recommended by Mr Moore in his Landscape Assessment and required by condition 3(d) and (e) of the conditions of consent recommended by Mr Buxton.

Transportation

- 56 The transportation effects were assessed by Council's Transport Planner, who concluded that the adverse effects of the proposed development on the transportation network to be no more than minor. This assessment is based on the permitted baseline of one residential unit, with the assessment focused on the additional 8 vehicle movements anticipated by a second residential dwelling.
- 57 Although several concerns have been raised by submitters with regard to traffic safety, further assessment by Council's Transport staff following the close of submissions concluded that the effects of the proposed development on the transportation network would be no more than minor.
- 58 Transport staff recommended that the seal of the vehicle access from the edge of the formed carriageway be extended from the existing 3m to 5m, and a condition of consent has been recommended by Mr Buxton to require this. The applicant accepts and agrees to this condition.
- 59 Transport staff also acknowledged that there are other improvements that could be made to the existing vehicle access point and road edge embankment which would have safety benefits, however stated that these would be addressing existing issues and are not considered necessary in the context of this application. These measures include increasing the distance of seal to 8m, minor cutting/benching of the road edge embankment, installing edge lines and centrelines on the accessway and either relocating edge marker posts or replacing them with cat eyes.
- 60 These improvements would result in an infringement to Rule 6.6.3.3.a.i (relating to widening the vehicle entrance beyond 6m) and Mr Buxton has suggested including this as a reason for consent and approving it as part of the application, to avoid the need to obtain further resource consent in the future. As I understand it, the applicant is not required to undertake these works to widen the vehicle access, but if the users of the vehicle access decide as a group to undertake safety improvements, then they would not need to apply for further resource consents. Final design of any improvements would be subject to a vehicle crossing approval from the Transport Department under the Local Government Act.
- 61 The applicants are open to working collaboratively with the other users of the vehicle access to achieve the above outcome and I support enabling the vehicle access to be widened to 9m, as suggested by Mr Buxton, in principle. As the

intention is to 'enable' rather than 'require' the vehicle crossing to be widened, I suggest this should be by way of a separate, standalone land use consent decision which approves a vehicle crossing up to 9m wide, rather than tied to the current subdivision and land use consent. This would require restricted discretionary activity consent under Rule 6.6.3.3. Alternatively, this consent could be applied for separately at a later date.

Infrastructure

- 62 I support the comments of the processing planner, Mr Buxton, in regards to infrastructure.
- 63 In particular, the resultant lots are considered large enough to accommodate onsite wastewater disposal, and this will be dealt with at time of building consent.
- 64 Appropriate easements will be created in favour of the DCC over the existing water main running through the site, and no construction will be undertaken in proximity to the water main.
- 65 The applicant agrees to the proposed advice note regarding the identification of existing services prior to undertaking any earthworks, to ensure no disruption to services occurs to the neighbouring property owned by JC and HA Moody.

Noise and glare

- 66 Submitters have raised concerns regarding the additional traffic movements associated with the application. It is noted that only those traffic movements over and above the permitted baseline of 8 vehicle movements associated with one rural residential activity per day should be considered in the assessment of effects. As such, the assessment should focus on the additional 8 vehicle movements created by a second rural-residential activity.
- 67 In the context of the permitted baseline, and the proximity to Three Mile Hill Road (a Strategic Road) I consider that the proposal will have less than minor adverse effects on the submitters, in terms of noise and glare.
- 68 Although Council's processing planner Mr Buxton does not consider adverse effects from noise and glare to be more than minor, he has recommended several conditions of consent to assist in addressing the concerns of submitters, including signage to encourage slow speed and maintenance of the driveway in a smooth condition, which the applicant accepts and agrees to. Mr Buxton also recommends consideration of additional boundary planting to provide screening along the 24m length of driveway adjacent to the curtilage of 138 Three Mile Hill Road, unless the owners of that site prefer not to have such screening.

- 69 The applicants are willing to provide screening along this length of driveway, if this is something that would be acceptable to the submitters, and agree with the conditions of consent proposed by Mr Buxton.
- 70 Due to the distance between the driveway and the neighbouring dwelling at 136 Three Mile Hill (approximately 60m) I do not consider it necessary to provide screening along the length of the eastern side of the driveway.

Hazards

- 71 I concur with the assessment of Mr Buxton and Council's consultant engineer that there are no natural hazards or stability hazards associated with the site.
- 72 Mr Buxton requested that comment be provided regarding potential HAIL activities, as the submission by JC and HA Moody raised concerns about truckloads of sediment and spoil-like material being brought to site.
- 73 Mr Nailard, the owner of the site has explained that several tonnes of topsoil have been brought to site from another farm property and stockpiled on site for use when the current development is undertaken. Mr Nailard has confirmed that any material brought to site was cleanfill material only.
- 74 By way of background, Mr Nailard also noted that when the Te Anau earthquake occurred in 2003, the Council-owned water pipeline traversing the property was fractured. When this was repaired, there were areas on the site which were not reinstated to original ground level, and topsoil was not replaced over the clay base. It is Mr Nailard's intention to use the stockpiled topsoil to rehabilitate this area in the future.
- 75 Based on discussions with the applicant, a review of the property file and the ORC database, I consider it more likely than not that no HAIL activities have been undertaken on the site. As such, the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 are not considered applicable to the proposal.

Productive rural activities and lot shape

- 76 I concur with the comments of Mr Buxton relating to productivity at paragraphs 67-71 of the s42A report.
- 77 I note that submissions raised concern with inclusion of the driveway in calculation of lot sizes. The 2GP does not exclude leg in driveways from calculation of lot size in the rural residential zones.

- 78 I also note that the subdivision layout has been designed to follow existing fence lines and site topography, therefore each proposed lot will contain existing usable paddocks which are fully fenced, enabling continued use of each site as individual lifestyle blocks or hobby farms.

Biodiversity

- 79 The application does not involve disturbance of the rock wall identified by the submitters as providing skink habitat, and the advice notes suggested by Mr Buxton are considered acceptable, in terms of advising the applicant of their responsibility to avoid disturbing the stone wall.
- 80 Existing mature native trees identified on the subdivision plan will be retained on site. Furthermore, the planting proposed as part of the application, as recommended by landscape architect Mr Mike Moore is to comprise of native species (pittosporum tenuifolium / kohuhu) which will provide additional habitat for birdlife. As noted above, a condition of consent to require landscaping to be established at the time of subdivision, rather than waiting for the development of residential buildings on the resultant lots, is accepted and agreed to by the applicant. This will immediately increase biodiversity value of the site.

Manawhenua, Cumulative Effects and Positive Effects

- 81 I concur with the comments provided by Mr Buxton in the s42A report. The proposed activities are not identified as threats for Wāhi Tūpuna Mapped Area 50, the proposal is unlikely to create cumulative effects, and will have a positive effect relating to the provision of an additional rural-residential living opportunity.

Proposed Consent Conditions

- 82 As confirmed in the above section, the applicant agrees to the conditions of consent and advice notes recommended by Mr Buxton. The conditions are considered to be in accordance with sections 108 and 108AA of the RMA.

Part 2 RMA

- 83 I concur with Mr Buxton's assessment of the application against Part 2 of the RMA and consider the proposal will meet the purpose of the RMA which is to promote the sustainable management of natural and physical resources.

Section 104 and 104D RMA

- 84 Section 104(1)(a) requires the decision maker to have regard to any actual and potential effects on the environment of allowing the activity. I consider that the adverse environmental effects are less than minor, and in accordance with conditions of consent.

- 85 Section 104(1)(b) requires the decision maker to have regard to any relevant objectives and policies of a plan or proposed plan. My opinion is that the proposal is consistent with and not contrary to the 2GP.
- 86 Section 104(1)(b) requires the decision maker to have regard to any relevant regional policy statement, regional plan or National Environmental Standard. The application is consistent with and not contrary to the relevant objectives and policies of the proposed RPS 2021 and RPS 2019.
- 87 Section 104(1)(c) requires the decision maker to have regard to any other matters considered relevant and reasonably necessary to determine the application. I concur with the conclusion of Mr Buxton, in that I do not consider that the proposal will create an undesirable precedent which would represent a challenge to the integrity of the 2GP. As Mr Buxton notes in his s42A report at paragraphs 98-99, the proposal provides for two sites where one is slightly less than the minimum permitted site size, but not dissimilar to other sites in the area.
- 88 In this regard, I note that the site is within a small, clearly defined cluster of properties which have recently been re-zoned from Rural to Rural-Residential, to reflect the existing character of the area. As discussed above, the physical character of the area is rural-residential and there are adjacent sites which are also under the 2ha minimum lot size. Due to the existing character of this area, and the location of the site within a discrete cluster of existing lifestyle block properties containing existing under-size sites, approval of the application will not undermine the integrity of the 2GP.
- 89 Section 104D of the RMA specifies that a resource consent for a non-complying activity must not be granted unless the proposal can meet one of two limbs. The limbs of Section 104D require either that the adverse effects on the environment will be no more than minor, or that the application is for an activity which will not be contrary to the objectives and policies of either the relevant plan or the relevant proposed plan.
- 90 I consider that the actual and potential effects associated with the proposed development are no more than minor and can be mitigated by imposing consent conditions. Therefore, the proposal passes the first 'gateway' test of Section 104D.
- 91 I have assessed the proposal as being consistent with the objectives and policies within the 2GP and I consider that the proposed development therefore passes the second 'gateway' test of Section 104D.
- 92 Based on my assessment, the proposal passes both 'gateway' tests.

Conclusion

- 93 Having considered the matters raised by submitters, the s42A Officer's Report and the provisions of the 2GP and RPS, I support granting consent to the application.

A handwritten signature in black ink, appearing to read 'E Spalding', with a stylized, cursive script.

Emma Spalding

19 October 2021