

**Before a Board of Inquiry
Basin Bridge Proposal**

Under the Resource Management Act 1991 (the Act)

In the matter of a Board of Inquiry appointed under section 149J of the Act to consider the New Zealand Transport Agency's notice of requirement and five resource consent applications for the Basin Bridge Proposal.

**Rebuttal Evidence of Richard Leonard Cheyne Reid for the
Mt Victoria Residents Association and Richard Reid &
Associates Ltd**

21 January 2014

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**REBUTTAL EVIDENCE OF RICHARD LEONARD CHEYNE REID FOR THE
MT VICTORIA RESIDENTS ASSOCIATION AND RICHARD REID &
ASSOCIATES LTD**

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1 Introduction

1.1 My full name is Richard Leonard Cheyne Reid.

1.2 My rebuttal evidence is given on behalf of Mt Victoria Residents Association (MVRA) and Richard Reid & Associates Ltd.

Qualifications and experience

I am the Director of Richard Reid & Associates Ltd, Citymakers, a multi-disciplinary design practice based in Auckland which specialises in integrating large projects with local environments.

I am a registered architect and registered landscape architect with 25 years of professional experience, working in Sydney and London for five years with two architects of national and international reputation, and in my own practice in Auckland for the last sixteen years. I also work as an urban designer and have led the urban design group at Manukau City Council in their re-planning of the Manukau City Centre and the production of a Public Domain Manual (2010-2011).

I have taught at the School of Architecture & Planning, University of Auckland, for the past ten years, teaching design at Masters level. I also lecture at the school on the design of transport infrastructure to Bachelor and Masters Students of Planning Practice and Urban Design respectively. I have published articles and given many public talks on the design of transport infrastructure to national and international audiences.

For the past ten years my practice has concentrated on the design of infrastructure projects. These have been predominantly transport projects but not exclusively. We have developed alternative solutions for three nationally important transport projects, and one transport solution for a nationally/internationally important heritage site, all of which have been adopted or implemented almost in their entirety by NZTA and/or Auckland City Council.

2.0 Rebuttal of Wellington City Council and Basin Reserve Trust Evidence

2.1 Overview

2.1.1 Evidence from representatives of the Basin Reserve Trust (BRT) has expressed concern that unless there is complete visual mitigation of moving traffic from the playing field the ground may lose its Test match status (evidence from Messrs Anderson, Clinton, Neely and Snedden). Concern has also been expressed about views of moving traffic on spectators experience of the ground (Clinton and Snedden) and the loss of amenity and attractiveness of the ground generally (evidence from Anderson, Clinton, Neely and Snedden).

2.1.2 Mr Neely states in 1.14 of his evidence:

“Unless properly mitigated, the Project will introduce views of moving traffic into the Basin Reserve. This has the potential to severely damage the attractiveness of the Basin Reserve as a Test cricket ground, and disrupt the unique atmosphere of the Basin Reserve. This would result in irreparable damage to the historical and cultural heritage of the Basin Reserve, and potentially the death of Test match cricket at the Basin Reserve, which would be a tragedy for Wellington and cricket in New Zealand.”

2.1.3 All representatives from the BRT are consistent in supporting a designation which includes a requirement for a 65metre long Northern Gateway Building (NGB) to protect the Test status, values and amenity of the ground, the performance of players and the experience of spectators.

2.1.4 The Board of Inquiry has requested the preparation of Visualisation Viewpoint 306a from the Museum Stand upper level to study the potential effects of the project. Mr Clinton specifically cites this visualisation in his evidence.

2.1.5 Three visualisations for Viewpoint 306a have been prepared:

- i) 7B.306A.E – Existing view
- ii) 7B.306A.B – Proposed View without Northern Gateway Building
- iii) 7B.306A.O – Proposed View with Northern Gateway Building – 65metre option

2.1.6 I believe the three visualisations reveal:

- i) the mitigation proposed for the project does not mitigate the project to the extent required by BRT
- ii) views of the flyover and moving traffic will be clearly visible from within and around the ground for players and spectators
- iii) the effects are wider and more significant than those commented upon by BRT and documented by NZTA
- iv) the effects will negatively impact on the values, performance, experience and amenity of the Basin Reserve
- v) it follows that because of these effects the Basin Reserve may lose its Test match status or further mitigation will be required.
- vi) this extra mitigation may have to take the form of a barrier or screen fixed onto the flyover to conceal the structure and moving traffic and would need to start from in front of St Joseph's Catholic Church in the east and finish beyond a NGB to the north-west (if the project is approved with a NGB)
- vii) if the project needs to be mitigated in this way, then it will have required substantially more mitigation than proposed in the application
- viii) If the project is not able to be mitigated to this extent, then all cricket may need to be relocated to other grounds elsewhere in Wellington. In any event, Test cricket matches may be played elsewhere because of other grounds' uncompromised and more satisfactory amenity

2.2 Viewing audience and NGB

2.2.1 Mr Clinton believes that even with a 65metre long Northern Gateway Building, moving traffic will still be seen from within and around the ground (Point 1.34). I agree with Mr Clinton's assessment.

2.2.2 Mr Clinton identifies two views which concern him. The first view is "the proposed 'view shaft' on the eastern end of the building which will permit a view of traffic passing on the Ellice St end of the bridge". My understanding is that Mr Clinton is referring to the view directly east of the NGB over and above the existing toilet block.

- 2.2.3 The second view Mr Clinton identifies is through the lower level gates of the 65metre long NGB which provide views at street level of Kent/Cambridge Tce when the gates are open.
- 2.2.4 In both cases Mr Clinton sees the potential for traffic movement to distract cricketers. I agree with Mr Clinton's concerns.
- 2.2.5 It is difficult to know why the view above the toilet block has not been fully mitigated by NZTA except to reason that a longer building than 65metres here would detract so completely from the project's internal and external contextual relationships that the prospect of a longer building became totally unacceptable.
- 2.2.6 In the first instance, a longer building would considerably increase the physical and spatial enclosure of the Basin Reserve with buildings, the effect clearly overturning the building/landscape balance of the cricket ground. The adverse effects of this have already been covered in my evidence (see Point 6.4). An even longer building would stretch the argument beyond any credibility that the NGB had a function comparable to its mitigation role.
- 2.2.7 Secondly, the extra length would extend the NGB beyond the building alignment and spatial enclosure of Kent Tce. This would demonstrate that the NGB had turned its back completely on the city context and was focused solely on its internal arrangement.
- 2.2.8 Whilst the applicant has not advocated for such an option, Mr Clinton is correct in saying the 65metre long NGB exposes the playing field to views of the flyover and moving traffic.
- 2.2.9 In Mr Clinton's opinion, this is unacceptable on the basis that such a view may endanger the ground's Test status, player safety and spectator experience. It is clear the mitigation proposed here by NZTA is deficient. The adverse effect is beyond the building footprint.
- 2.2.10 The other view Mr Clinton is concerned with - under the NGB - requires the proposed public gates to be closed during play and possibly practice. Whilst the adverse effect of this can be remedied by the design of the NGB, the building itself produces significant adverse effects being sited in this location.

2.2.11 The adverse effects of the NGB have already been covered in my evidence (see Point 6.4). I also refer to Ms Jan McCredie's rebuttal of Mr McIndoe's evidence which I agree with in its entirety.

2.2.12 There are other views of the flyover and moving traffic which Mr Clinton and other representatives have not commented upon. In my opinion the proper way of verifying these is to build a physical model of the project and test the different views against it.

2.3 Viewing audience and mitigation planting

2.3.1 The Northern Gateway Building 65metre long option will also not provide visual mitigation of the flyover or moving traffic on the flyover at the north-east corner of the ground.

2.3.2 NZTA has proposed to relocate pohutukawa trees on the top of the grass embankment to conceal views of the flyover here but these trees will need to be very large and mature specimens to achieve this. I believe that the scale of the trees represented in Visualisation 7B.306A.B - Viewpoint 306 is not accurate. The pohutukawa trees that have been identified for relocation here are not close to this size. Nor is it likely any trees the size shown in the visualisation could be replanted in the real world. The trees identified to be relocated will still need many years, if not decades, to grow to this scale, all the while leaving the flyover and moving traffic in view.

2.3.3 Mr Clinton is right to express doubt in his evidence about whether trees can effectively mitigate the project (Point 1.33). In my experience as a landscape architect, trees grow in ways that are not always easily controlled; relocated trees sometimes do not recover (or are slow to recover) full health or grow with an unpredictable habit after replanting; they are always subject to unpredictable events such as storms and disease; and there are always openings through pohutukawa canopies regardless of tree spacings which becomes particularly characteristic of pohutukawa the older they get.

2.3.4 Hence, I believe the visualisation presents an inaccurate, unreal and misleading picture of mitigation for the project. Views of the flyover and moving traffic will be clearly visible from within the ground, including from the Museum Stand and I believe the Vance Stand as well. This will create the degree of negative impacts the BRT is concerned the project should avoid.

- 2.3.5 The view from the Museum Stand shows that if the relocated trees were accurately represented, then the flyover and moving traffic will be visible within in the field of vision. This constant movement will undoubtedly negatively impact the spectator experience.
- 2.3.6 An accurate visualisation of the view would show moving traffic fully visible from St Josephs Catholic Church all the way round to the NGB and possibly beyond. This is a very wide field of distracting movement and indicates that NZTA's mitigation has failed to mitigate the significant adverse effects of the project.
- 2.3.6 It follows that because of these effects the Basin Reserve may lose its Test match status or further mitigation will be required. This extra mitigation may have to take the form of a barrier or screen fixed onto the flyover itself in order to provide the certainty of screening that is required by BRT. This screening would need to start from in front of St Joseph's Catholic Church in the east round to and behind the NGB in the north-west (if the project is approved with a NGB).
- 2.3.7 In Mr Neely's opinion, loss of Test status would result in irreparable damage to the historical and cultural heritage of the Basin Reserve. In my opinion the project as proposed will already cause irreparable damage to the historical and cultural heritage of the city. Any further screening of the flyover, on the flyover itself, would only serve to entrench this tragedy. Any of these outcomes are totally unacceptable.

2.4 Other adverse effects of the project

- 2.4.1 In my opinion Visualisation 7B.306A.B - Viewpoint 306a clearly shows that the flyover and mitigation planting also create significant adverse effects on the receiving environment. The flyover and planting heavily infill the open space of the roundabout; the trees, in particular, producing a cluttered, random effect. They simply do not look like they belong and appear there to conceal the flyover, not complement or enhance the setting.
- 2.4.2 In my opinion the inclusion of a 65metre long NGB in Visualisation 7B.306A.O - Viewpoint 306a demonstrates that the flyover is being squeezed within an overloaded built environment which the NGB contributes to by being in the

wrong place. The flyover's fit is a poor one and its alignment is compromised rather than balanced.

2.4.3 The three visualisations from Viewpoint 306a also reveal:

- i) the spatial structure of the roundabout has been lost
- ii) the sympathetic transition in scale, character and building fabric between the Basin Reserve and Mt Victoria historic suburb has been destroyed
- iii) the existing importance of the Ellice St alignment in relation to the Basin Reserve has been lost. NZTA's project overwhelms and destroys the relationships between street and park; park and suburb; park, street and Town Belt; and street, park and historic Sussex Square
- iv) New buildings should instead re-define the Kent Tce/Ellice St corner (replacing the temporary park) and reinforce the Ellice St street alignment, strengthening the relationship of the built and natural environments with the Basin Reserve. The Basin Reserve Roundabout Enhancement Option works in this way. An at-grade solution protects and enhances all these relationships

2.5 Spectator experience

2.5.1 Mr Clinton (Point 1.35) and Mr Snedden (Point 1.33) specifically comment on the importance of the spectator experience.

2.5.2 Mr Snedden states that spectators will be negatively impacted by views of moving traffic and comments on the subsequent loss of amenity of the ground if a 65metre long NGB is not built. He draws attention to the fact that the Application and Evidence in Chief do not address the impact of the Basin Bridge on spectator experience (Point 1.34). I agree with Mr Snedden's concern about the absence of this evidence.

2.5.3 All the BRT representatives make a distinction in their evidence between a primary concern for protecting the views of players on the field versus spectators' point of view. However, where spectators' views have been taken into account by Mr Snedden and Mr Clinton, comments are restricted to reinforcing the importance of the view from the southern end of the ground which a NGB is intended to mitigate. It appears from their evidence that this is the only spectator view adversely affected by a flyover and moving traffic.

- 2.5.4 Visualisation Viewpoint 306a demonstrates that spectators' experience will be negatively impacted from other points, including the Museum and Vance Stands and wherever else a raised height offers overviews of the setting.
- 2.5.5 The view from the Museum Stand shows that moving traffic will always be in the field of vision and will detract and disrupt the spectator experience, negatively impacting upon it.
- 2.5.6 It is very likely there are other areas of the ground which would suffer the same impact upon spectator experience, however I am unable to establish this with certainty because NZTA has not visualised a diverse range of spectator viewpoints. I strongly agree with Mr Snedden's point, therefore, that this work should have been done by NZTA so that the effects of the project can be properly assessed.

2.6 Viewing audience on TV

- 2.6.1 I believe the flyover will also likely be in full view of TV cameras for Test match cricket. The position of cameras for cricket matches is predominantly at a height that enables a contextual appreciation of the ground's setting at the same time as following the actions of the game. As an avid watcher of Test cricket I have observed that it is customary for cameras to pan across views of the background environment and the TV coverage provide commentary on these views. These views of the flyover will be severely negative.
- 2.6.2 I am also aware that Test cricket is covered by a whole host of local, national and international media who will be able to see the flyover and moving traffic from within and around the ground. I believe these views of the flyover will also be severely negative.
- 2.6.3 The views of the flyover will portray to a global TV audience that an internationally discredited and disputed transport vision has been built beside an internationally valued and respected cricket ground. I believe that the Basin Reserve may be in danger of losing its favoured reputation with this audience as a result. I cite the evidence of Mr Snedden who states "Once the reputation of a venue is damaged, it is very difficult to repair." (Point 1.51)

2.7 Conclusion

2.7.1 In my opinion Visualisation 7B.306A - Viewpoint 306a demonstrates that views of the flyover and moving traffic cannot be mitigated. As a result the project, including proposed mitigation, produces significant adverse effects.

The application should be declined.

2.7.2 Furthermore, because the flyover and moving traffic will be in view from within and around the ground, it appears possible based upon the concerns expressed by representatives of the Basin Reserve Trust that the Basin Reserve will lose its Test match status.

2.7.3 If the project is not able to be mitigated to this extent, then it logically follows that all cricket may need to be relocated to other grounds elsewhere in Wellington.

2.8 Basin Reserve Roundabout Enhancement Option

2.8.1 With the Basin Reserve Roundabout Enhancement Option there are no views of moving traffic from within the ground. This is because the traffic continues to move at-grade level. The Basin Reserve Roundabout Enhancement Option avoids any of the adverse effects associated with the project.

2.8.2 I consulted with Mr Neely and Mr Peter Clinton, Chief Executive of the Basin Reserve Trust, on the morning of 25 May 2012 about the at-grade design I was then developing. Mr Neely specifically asked me if an at-grade traffic upgrade of the roundabout would change the internal view within the ground. I said an at-grade traffic plan upgrade would not change anything within this view. Mr Neely remarked "marvellous".

2.8.3 The Basin Reserve Roundabout Enhancement Option, prepared in collaboration with John Foster and David Young, is a significant development of the at-grade traffic plan I showed Mr Neely and Mr Clinton in 2012. I have also incorporated our practice's urban design and landscape plan for the surrounds to the Basin Reserve.

2.8.4 This plan will create a consistent, cohesive and softer road space for the whole of the roundabout which will likewise improve the consistency and cohesion of the inside perimeter of the cricket ground. The amenity and

attractiveness of the outside road space as well as the inside cricket ground will be significantly improved as a result.

2.8.5 The Basin Reserve Roundabout Enhancement Option will maintain the ground's Test status and I believe will improve its international reputation.

3.0 Rebuttal of Robert Stephen Spence Evidence (WCC)

3.1.1 I have read the evidence of Mr Spence from Wellington City Council. I make the following comments on his evidence.

3.1.2 Rugby St / Adelaide Rd intersection

I support the recommendation Mr Spence has made for further investigation work on the operation of the traffic signals at the Adelaide Rd/Rugby St intersection. I note Mr John Foster in his evidence and Abley Transportation Consultants' Peer Review has also raised significant concerns about the design of this intersection due to the potential safety issues from weaving traffic.

Furthermore, I believe the free-flow arrangement for this intersection will cause conflict between vehicles on Rugby St and pedestrians and cyclists wanting to cross Rugby St. In NZTA's proposal, crossing this road is treated as an unplanned intervention in the consistent, regular and predictable flow of traffic. There is no traffic light phasing unless pedestrians activate the signals. Yet it is clear that pedestrian volumes at the Roundabout peak at the same time as traffic volumes – i.e. before and after work and school. Due to the unplanned activity and accommodation of pedestrians, there will be conflict between NZTA's desired maintenance of traffic flow and the needs of pedestrians. It is likely there will be both traffic back-up and pedestrian congestion at this intersection which will cause travel time delays for pedestrians as well as possible unsafe behaviour due to impatience.

In the Basin Reserve Roundabout Enhancement Option prepared by John Foster, David Young and myself, walking is a planned activity and is integrated with the traffic light phasing of the Roundabout so that traffic flow accommodates walking in a consistent, regular and predictable way. Hence, in our proposal walking is integrated with the movement of traffic and the overall performance of the roundabout.

The effects on this intersection from future implementation of the Public Transport Spine are unknown at this stage, including PT's relationship with pedestrian activity at the Roundabout. Mr Spence does not comment upon this. The PT Spine Study has proposed two options (BRT and Light Rail) which have routes which use the Roundabout although no layout has yet been

produced. Only the Bus Priority option avoids the Roundabout by retaining use of the existing Haitaitai bus tunnel.

In my evidence, I stated that the PT Spine Study findings, like the Basin Bridge Project, are out of accord with the long term vision for the city, as well as best practice for cities internationally. The scientific infrastructure analysis by Space Syntax of 'City Centre Movement' (commissioned by Wellington City Council in 2011) indicates that the proposed PT infrastructure for the eastern spine is in the wrong place. This has significant implications for the Basin Bridge Project.

I referred in my evidence to two key diagrams from Space Syntax's report to substantiate this claim (see Dwg No.19, BRR_498, and No. 20, BRR_497, in my drawing set on the EPA website and Point 7.3.7 in my evidence).

The first diagram (Dwg No.19, BRR_498) shows that the strongest and most direct route for all vehicular traffic from the eastern suburbs to the central city is via the existing Haitaitai bus tunnel. The second diagram (No. 20, BRR_497) shows that the proposed PT route along Ruahine Street has poor accessibility and connectivity compared to the Haitaitai suburban centre.

I recommended in my evidence, as well as in my submission on the PT Spine Study to Greater Wellington Regional Council, that the proposed eastern spine route along Ruahine Street should be removed from the study. It fails to convince on any number of fronts, including socially, environmentally and economically. The existing Haitaitai bus tunnel should remain as a core part of the PT infrastructure.

I also recommended that Space Syntax should be commissioned to substantiate the PT Spine Study's analysis, findings and redirect its failings. I note that Jan McCredie in her rebuttal of Wellington City Council evidence for the project has recommended Space Syntax's involvement for various other parts of NZTA's proposal.

3.1.3 Kent/Cambridge/Vivian/Pirie intersection

I support the recommendation Mr Spence has made for further investigation work on the operation of the peak and non-peak cycle lengths in signal plans for the Kent/Cambridge/Vivian/Pirie intersection.

3.1.4 Link road between Ellice St and Dufferin St

I share the concerns Mr Spence has expressed in his evidence for the proposed link road between Ellice St and Dufferin St, and whether it is designed in a way that will provide safe, legible, and efficient use of the link road without adversely impacting on pedestrians, cyclists and traffic using the state highway. I believe this is a very poor piece of planning and I note Abley Transportation Consultants' Peer Review also has significant concerns with the design.

3.1.5 Pedestrian crossing in the north-west corner of the Basin Reserve roundabout

I do not support the design recommendation Mr Spence has made for the provision of a pedestrian crossing in the north-west corner of the Basin Reserve roundabout where Sussex St joins Buckle St to provide for an established desire line. I believe the slip lane proposed by NZTA running from Sussex St to Tory St will make this 'intersection' unsafe for pedestrians. I also think both the slip-lane and pedestrian crossing are unnecessary especially as there are two other more direct desire lines for pedestrians and cyclists in the vicinity – 1) use of the proposed extension to Memorial Park will better access Cambridge Tce and 2) the Rugby St/Tasman St route. Space Syntax's pedestrian and vehicle infrastructure analysis for WCC shows that this is a stronger desire line than the slip lane and a pedestrian crossing where Mr Spence recommends one. See Dwg No.19 (BRR_498) and No. 20 (BRR_497) on the EPA website and Point 7.3.7 in my evidence

3.1.6 Redesign to a smaller radius of the sweeping left hand curve leading from Buckle St into Cambridge Tce

I do not support the design recommendation Mr Spence has made for the redesign to a smaller radius of the sweeping left hand curve leading from Buckle St into Cambridge Tce. Mr Spence's recommendation is unclear without a drawing illustrating his idea and does not contemplate the urban design outcome for the roundabout. The roundabout is symmetrically balanced as a whole and at each corner with a clear axis running north-south along Kent/Cambridge Tce. Tightening the radius may change the formal properties of the roundabout in an adverse way and weaken the urban qualities of its plan. This might also cut into potential pedestrian space being

developed within the median or bring traffic too close to pedestrians using the median.

3.1.7 Cycling on NZTA's proposed layout of the roundabout

I disagree with Mr Spence's support of cycling on NZTA's proposed layout of the roundabout. Mr Spence envisages cyclists will share bus lanes. However any bus lanes provided are discontinuous and mostly located in the middle lanes of the roundabout (e.g. Ellice St / Dufferin St), making access to the bus lanes difficult and unsafe. Cycling would also be difficult and unsafe in the bus lane at the corner of Rugby St and Adelaide Rd because of the intention to locate a bus stop here. In areas of the roundabout where there are no bus lanes provided (e.g. Dufferin St south), cyclists would need to share lanes with all vehicles which will be difficult and unsafe given it appears no extra lane space has been provided for them. Overall, I believe the NZTA layout for the roundabout is not a safe or legible environment for cycling

3.1.8 Mt Victoria Residents Association submission

I disagree with Mr Spence's comments on the Mt Victoria Residents Association submission.

The proposal does not address the perceived problem.

David Young's evidence for Mt Victoria Residents Association/Save the Basin outlines the merits of the at-grade Basin Reserve Roundabout Enhancement Option and addresses Mr Spence's concerns regarding traffic issues.

I agree with Jan McCredie's rebuttal of Mr Geoffrey Swainson and Warren Ulusele's evidence for Wellington City Council. Ms McCreide's rebuttal discusses the predictable and pre-conceived approach of transport planners to these situations; the always strongly negative impacts of grade-separated transport projects on their receiving environments; the selection of an approach which is out of line with current international best practice for the development of inner city areas; and the failure of Wellington City Council to adhere to its own strategies and policies regarding the need to achieve wider objectives and more sensitive outcomes for the city other than solely transport ones.

I direct the Board to my drawing No. 9 (BRR_476) on the EPA website which illustrates only a very minor amount of extra road space is required for the at-grade Basin Reserve Roundabout Enhancement Option which is in marked contrast to NZTA's ground claim and air claim for the flyover and mitigation required for the project's adverse effects. The Enhancement Option has no impacts on properties and is based upon the enhancement of the local area.

Ms McCredie has also responded to the concern that this at-grade layout is hostile to pedestrians and cyclists in her rebuttal of Graeme McIndoe's evidence for Wellington City Council.

Overall, Mr Spence's concerns are not substantiated by the evidence and in fact many of his criticisms are relevant to the NZTA project.

The proposal is contrary to WCC and GWRC plans for Wellington city.

Mr Spence disagrees with this criticism made by the Association. Ms McCredie has outlined in great detail in her rebuttal of Messrs Ulusele, Swainson and McIndoe's evidence the reasons why the proposal is contrary to WCC and GRWC plans for Wellington, including the plans Mr Spence cites.

4.0 Rebuttal of Elizabeth Janice McCredie Evidence (Mt Victoria Residents Association)

4.1 I have consulted with Jan McCredie regarding her rebuttal evidence of Messrs Ulusele, Swainson and McIndoe and entirely agree with her assessment and conclusions.

Signed

A handwritten signature in blue ink, appearing to read 'Richard L C Reid', written in a cursive style.

Richard L C Reid

21 January 2014