

TO THE HEARINGS PANEL OF THE WAIKATO DISTRICT COUNCIL

IN THE MATTER of Hearing Submissions and
Further Submissions on the
Proposed Waikato District Plan
(Stage 1)

AND

IN THE MATTER of the Proposed Waikato District
Plan – Hearing 20 Maaori Sites
and Areas of Significance

WRITTEN STATEMENT: PERJULI DEVELOPMENTS LIMITED
Hearing 20 Maaori Sites and Areas of Significance
DATED 6th DAY OF November 2020

Introduction

1. This submission is made by Perjuli Developments Limited (Perjuli) in response to the direction issued by the Waikato Proposed District Plan Hearings Panel (dated 28 August 2020) – and is in regard to Hearing 20 Maaori Sites and Areas of Significance (MSOS).
2. Perjuli acknowledges the opportunity to make this submission.

Background

3. Perjuli is the registered owner of the property located at 5851 Great South Road, Ngāruawāhia, and has been identified by the Hearings Panel as an affected landowner in relation to a proposed MSOS policy overlay. The MSOS was not previously indicated within the Notified Proposed Waikato District Plan (PDP).
4. The Panel directions of 28 August 2020 (“**Directions**”) stated at 5(b) that Council should write to relevant landowners (including Perjuli) and:
 - i. *Inform them that a submission on the proposed plan has stated that their land contains a Maori Site or Area of Significance (as the case may be) and have requested that this be identified as such in the Waikato District Plan;*
 - ii. *Provide sufficient detail about the relevant Maori Site or Area of Significance so that the landowner can understand what has been requested, why it has been requested and what consequences it would have for their use of that land;*
 - iii. *Advise the landowner that the Panel wishes to obtain their views before making any decision on whether or not to accept the submission and/or further submission; and*
 - iv. *Invite the landowner to provide a written statement setting out their views.*
5. Council wrote to Perjuli on 19 October 2020 and advised Perjuli that they would need to make a submission on or before 6 November 2020 on the above matters. This submission therefore addresses several issues:
 - a. The first issue, as per para 5(iii) of the Directions, is whether the Panel should accept the late submission from Ngati Tamainupo. Perjuli submits that the Panel should not receive this late submission.
 - b. The second issue is whether the Panel should accept the Council Planner’s recommendation, as per the section 42A Report, that the property at 5851 Great South Road, Ngāruawāhia, be included as a Maaori Site of Significance (MSOS) in the PDP. Perjuli submits that the Panel should not accept this site as a MSOS and has significant concerns about the proposal to this effect in Council’s section 42A report.

Late Submission

6. The position of Council and Ngati Tamainupo appears to be that the late submission should be accepted. It can be assumed that Ngati Tamainupo, as a late submitter, wishes for its submission to be heard. Council’s position on the issue is more curious.
7. The section 42A Report seems to take the view that the late submission should be accepted, referring to it as a ‘further submission’ and not addressing its lateness.
8. In addition, Council’s memorandum of 19 August 2020 does not address issues relating to late submissions, seeming to assume that such a late submission should be accepted.

9. Council's legal submissions suggests at paragraph 3 that Council is under no obligation to advise landowners of submissions affecting their land and suggest that landowners should have become aware themselves (paragraphs 9 – 10).
10. Paragraph 10 expressly states that Council has chosen not to notify landowners.
11. Perjuli submits that if it is case that a late submission of this nature was to be extended, with the result that late submitters would get an extension of time, then Council was required by sections 37 and 37A of the RMA, and particularly section 37A(6), to notify Perjuli as a party 'directly affected' by an extension of time.
12. Perjuli is concerned that Council formed the view that they (and other parties) did not need to be notified, as per paragraph 10 of Council's legal submissions. Perjuli's view is that it should have been notified. As identified below, failing to notify Perjuli has had the important impact of the section 42A report being prepared without any recognition of Perjuli's position or submissions.
13. Notwithstanding that Council apparently believed it was not under any obligation to notify affected landowners, Council seems to have reached the conclusion that landowners should be allowed to be heard, but not present expert or technical evidence (paragraph 16 of Council's legal submissions).
14. Perjuli is concerned that Council's view is that its rights as submitter should be limited, and submits they should not be limited in this way. Perjuli should be entitled to call expert and/or technical evidence, and this evidence should be permitted to address a number of topics as outlined below.
15. Perjuli is also concerned that Council seems to believe its communications with landowners have been satisfactory, as per paragraphs 19-24 of the legal submission. Council seems to believe that status as a further submitter was sufficient, as per paragraph 28 of the legal submissions. Perjuli is concerned that it has taken significant efforts to get to the point of being heard on this matter, and that Council does not seem inclined to support landowners being heard, despite Perjuli's land being adversely affected by these proposals. In addition, at no point has Council properly addressed its willingness to hear late submissions.
16. Perjuli acknowledges that the Hearings Panel has a discretion to hear late submissions, but is concerned that it has not become aware of the late submission directly affecting its land because of Council taking proactive steps to notify Perjuli, but rather through specific circumstances as follows:
 - a. Perjuli became aware of the MSOS policy overlay submission affecting the property by chance on 6 July 2020 through accessing Council's 'submission layer' on the PDP GIS Mapping software (updated in May 2020).
 - b. Upon raising the perceived 'ambushing' effect of Submission 962.1 with Council, Perjuli was advised that as Perjuli did not provide a further submission in opposition to the submission there was no ability to be formally involved in the Hearing 20 process (email dated 9 July 2020 from Carolyn Wratt).
 - c. As the MSOS overlay was not indicated in the Notified PDP, Perjuli was not

actively monitoring the property in respect of submissions – and consequently a further submission in opposition to Submission 962.1 was not lodged.

- d. This reflects that Council did not take proactive steps to advise Perjuli of Submission 962.1, nor its lateness, but rather that Council seems to have taken the view that there was no obligation for Council to communicate with Perjuli on this matter.
 - e. Upon becoming aware of the effect the submission could have on its property, Perjuli obtained a copy of Submission 962 through Council's online submission database and notes that the submission's stamped date of receipt was 19 October 2018 – this being ten (10) days after submissions closed.
 - f. As noted above, in accepting a late submission (that is, in allowing an extension of the submission timeframe) Council was obliged to serve notice to any person directly affected by the time extension under sections 37 and 37A of the RMA (especially section 37A(6)). The late submission was not directly notified to the landowner, and as noted above, Council has not addressed its lateness, simply accepting it.
17. Perjuli wishes to advise the hearing Panel that whilst Perjuli did not provide a further submission under Schedule 1 of the RMA opposing Submission Point 961.1, if Council had directly notified the landowner at the time of receiving the late submission in accordance with section 37A(6) then a more comprehensive further submission opposing Submission 962.1 would have been lodged.

The Submission

18. The Ngati Tamainupo submission, which was lodged late and is date stamped 19 October 2018, states that Ngati Tamainupo seeks the preservation of some of the borrow pits on this and other sites
19. This can be interpreted as meaning that Ngati Tamainupo acknowledges there may be other borrow pits in the area. For reasons outlined below, Perjuli wishes to highlight this point, as it suggests that Perjuli's property is being singled out from others, and that a broader strategic assessment of all borrow pits in the area, as proposed by Dr Kahotea in his report, is necessary before MSOS status is confirmed at this property.
20. It is also important to note that the submission refers to protection of 'some' of the borrow pits. That is not a reference and cannot be read to mean that *all* borrow pits should be protected, though that seems to be the interpretation taken in the section 42A report. Further comments on the section 42A report are made below.
21. The Ngaati Tamainupo submission is light on specific relief, and it seems this has only been fleshed out in the section 42A report and subsequent hearing presentations on which Perjuli has only now had a proper opportunity to submit.

Concerns at Conflict of Interest and Section 42A Report

22. As noted above, a particular concern of Perjuli is that Council seems to have taken the view that Perjuli did not need to be notified of the further (and late) submission, nor that Perjuli

necessarily had a right to be heard. Perjuli has concerns that this indicates a bias on the part of Council against Perjuli.

23. Perjuli also has concerns about the section 42A report and submits this is a partial and biased document that should be disregarded by the Hearings Panel.
24. The Council planner who wrote the section 42A report notes at paragraph 9 (page 7) that she has *hapuu connections to Ngaati Tamainupo* – the submitter with an interest in Perjuli's land. This reflects a conflict of interest in respect of that submission.
25. This connection appears to lead the Council planner who wrote the section 42A report into a quasi-advocacy role. To provide some examples of these concerns
 - a. It is stated at para 15 that MSOS identification is primarily concerned with 'historical significance'.
 - b. It is stated that the scheduling of a site as a MSOS 'does not afford access to private property'. However, information attached to the Submission and available on Council's website refers to the Ngati Tamaingupo protest, which involves hapuu members accessing private property (albeit in an unlawful manner).
 - c. It is stated that the writer disagrees with Heritage NZ's assessment that MSOS should be ground tested, and that the appropriate time to identify how to address a site of significance is at the time of earthworks being required (para 44). This ignores that a site such as Perjuli's is already zoned residential, and would have an impact on the development of its land.
 - d. It is stated at para 46 that identifying paa sites is insufficient, as this marginalises the space that a hapuu occupies. This implies an expansive view of MSOS, of 'vast gardens' and 'activities of village life'. As will be shown below, this approach could have an impact on development throughout Ngāruawāhia.
 - e. It is stated at paragraph 90 that the borrow pits are '*deemed MSOS and of high cultural value to Ngaati Tamaingupo and Ngāruawāhia history*' (emphasis added). This seems to be an acceptance of the Submission, rather than any analysis of it. Perjuli's view is that it is not for the section 42A writer to decide what is and is not a MSOS.
 - f. The section 42A report notes that the evidence of Dr Kahotea recommends that there be a comprehensive review of the remaining Waikato Horticultural Complex (paragraph 92).
 - g. However, the writer goes far beyond this to recommend that remaining borrow pits be added to planning maps as a MSOS (paragraph 93). It is worth noting that this recommendation is not based on the evidence of Dr Kahotea, nor on any consideration of Perjuli's submissions. Rather, it is simply based on the views of the writer, apparently adopting Ngaati Tamainupo's views.
 - h. The limitations of the section 42A report are also apparent from paragraph 94, which says:
 - I. That the borrow pits on the site: '*are the last evidence of the cultural landscape of Maaori horticultural gardens associated with that Pukeiaahua Paa site*'.
 - II. As will be noted below, this is a flawed position. The section 42A report contains a number of lidar images showing significant clustering of borrow pits on land immediately abutting the Pukeahua Paa site (to the south), as well as an extensive network of remanent borrow pits preserved in perpetuity within the

Ngāruawāhia Golf Course. These clusters are less spatially constrained to the land occupied by the Pa and are easily observable and accessible from the Pa as well as being accessible to the wider public (eg, via Ngāruawāhia Golf Course).

- III. This paragraph 94 also suggests that the borrow pits are or were food pits. They are not: as Dr Kahotea's report notes on page 82, they are concerned with quarries to access alluvial soils and gravels, not food preparation or storage¹.

26. Perjuli does not agree with the comments at paragraph 94 and submits that these are emotive and incorrect.
27. In addition:
- a) Paragraph 136 suggests that all relief that has been sought in relation to MSOS is site-specific. This can be seen to be because MSOS are genuinely only an issue where specific sites are affected, as is the case here.
 - b) The comments at paragraph 140 of the section 42A report, which suggest that MSOS status will reduce costs for landowners, are unsupported and in Perjuli's view unjustifiable, when MSOS status could well affect further development of its site.
 - c) Interestingly, at paragraph 151 the planner acknowledges a different methodology for another site, focused on paa sites, and in favour of Dr Kahotea's methodology (in each case in contrast to the writer's views at paragraph 46 and paragraph 93).
28. Unfortunately, it appears that Council does not wish for Perjuli to present expert or technical evidence to contest the failings of the Submission, the section 42A report, or Council's own submissions. Perjuli is concerned that the section 42A report takes an approach that is more like advocacy than expert evidence, particularly at those points noted above. Perjuli notes the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014, especially clause 7.2(b).
29. Perjuli has been unduly prejudiced by the section 42A report taking an advocacy role in favour of one of the submitters, without Perjuli being able to make a submission and without the section 42A report considering Perjuli's position. The comments on Riverglade at paragraph 151 of the section 42A Report highlight that if Perjuli had been able to make a submission that could be considered in the section 42A Report, then the comments in the report may well have been different and more balanced.
30. Perjuli submits that the section 42A report in its current form should be disregarded entirely

Plan Change

31. Perjuli purchased the property following the land being rezoned from Rural to New Residential under Plan Change 17 (PC17): *Ngāruawāhia and Surrounding Villages*.
32. Between 2013 and 2016, PC17 the property progressed through an appropriate RMA Schedule 1 process which involved significant input from the local community and interested parties whereby robust consideration to housing demand, infrastructure

¹ Technical Report Section 42A Hearing Maori Sites of Significance: Dr Des Tatana Kahotea June 2020

upgrading, transportation and cultural effects were subject to section 32 RMA analysis and tested through a full public notification process, where all parties had an ability to be heard.

33. PC17 became operative in 2017, reflecting the public desire to extend the residential zone of Ngāruawāhia to the south, a desire that was given effect to from a robust planning perspective. Council was comfortable with this position.
34. The section 42A report for PC17 records no specific concerns in respect of borrow pits in the area, whether by Ngati Tamainupo or otherwise. It is therefore unclear to Perjuli as to why the subject site, which contains substantially modified borrow pits, has now attracted specific cultural interest from both the 962 submitter and from Council's Planner in the section 42A report.
35. Had these specific cultural significance concerns been expressed under the PC17 process and been reflected in the property's zoning, then Perjuli may not have purchased the property. Since its purchase Perjuli has heavily invested in the property as a component of the greater River Terraces residential development project.
36. Significant prejudice will accrue to Perjuli if the subject site is declared a MSOS as the Council section 42A report writer wishes, as the land will no longer be able to be used for residential development in the same way. This is particularly the case if the MSOS is declared without the overall strategic assessment described in Dr Kahotea's report.
37. It is also pertinent to note that in April 2020, Perjuli was granted a Land Use Consent (LUC0350/20) for residential land use preparatory earthworks within the property at 5851 Great South Road by Council; and furthermore, that this LUC was issued with a consent condition that the appropriate Archaeological Authority was obtained (pursuant under the Heritage New Zealand Pouhere Taonga Act 2014) before any works occurred in relation to registered archaeological sites.
38. This authority was obtained by Perjuli on 25 March 2020 (AUTHORITY NO: 2020/519), highlighting that Heritage New Zealand has no concerns about the historical significance of the borrow pits – and as the section 42A Report notes at paragraph 15, it is the historical significance with which MSOS is concerned.
39. Perjuli submits that the borrow pits should not be considered a MSOS because of this prejudice.

Precedent Effect and Plan Integrity

40. Perjuli submits that the subject borrow pits are heavily modified, damaged, and sit within private land that has only recently been zoned for residential land use, pursuant to a fully publicly notified process. Heritage NZ has assessed that the borrow pits do not have archaeological significance.
41. Further, Perjuli is concerned at Council's position that Perjuli should not necessarily have been notified, and the partiality, inconsistent and *ad hoc* approach taken of the section 42A report prepared by Council's planner.
42. Perjuli submits that to assign MSOS status to these borrow pits would have alarming precedent effects and an impact on the integrity of the entire PDP. These concerns are not just for Perjuli, and not just the development community, but also the broader community

as a whole.

43. To assign MSOS status to the borrow pits based on Submission 962.1 would lack robustness, consistency, and would have concerning precedent effects. As the piece of land has been strategically considered through PC17, a more balanced approach to environmental and urban growth pressures than is contained in the Submission and the section 42A report is necessary. Council has invested in infrastructure and other ingredients that are needed for land to be available for housing, and the planning framework should continue on this basis.

Other Borrow Pits

44. In a physical sense, when viewing the lidar imagery in the section 42A report in regard to the clustering of identified borrow pits, a large number of such features are located in closer proximity to the Pukeahua Paa site (and so are more readily preserved in through the current rural and reserve land zoning). Perjuli submits that there is nothing unique or significant about its site. The comments at paragraph 94 of the section 42A report that this is the last evidence of its kind is incorrect.
45. It is uncertain as to why the modified and disturbed borrow pits that are contained within land that has been recently subject to robust and methodical assessment under PC17 (and more recently subject to an approved LUC for earthworks and subsequent Heritage Authority) are specifically identified by the submitter as holding an elevated cultural significance – and yet similar features located closer to the Pukeahua Paa or otherwise preserved on the Ngāruawāhia Golf Course have not.
46. Perjuli submits that this inconsistency and apparent arbitrariness over MSOS classification is a critical consideration for the Hearings Panel. It highlights the discrepancy between the technical advice for Council to undertake a strategic review of all such cultural/horticultural features across the Waikato District before assigning significance, and the approach of the section 42A report writer in recommending MSOS status be granted to the site. Perjuli submits that for certain sites to be singled out on an *ad hoc* basis without a fuller review or the chance for further technical and expert evidence or submissions affects the integrity of the entire PDP. Council's position, as outlined above, is that Perjuli should not be able to present such technical or expert information.
47. The diagrams below, taken from Council's own reports and evidence, show that the site is far from unique in having borrow pits present (noting that these are modified and damaged borrow pits). Rather, borrow pits are a regular feature of the landscape, and if an expansive view was taken, it may be that most of Ngāruawāhia would be found to have evidence of borrow pits. That highlights that this particular property should not be singled out.



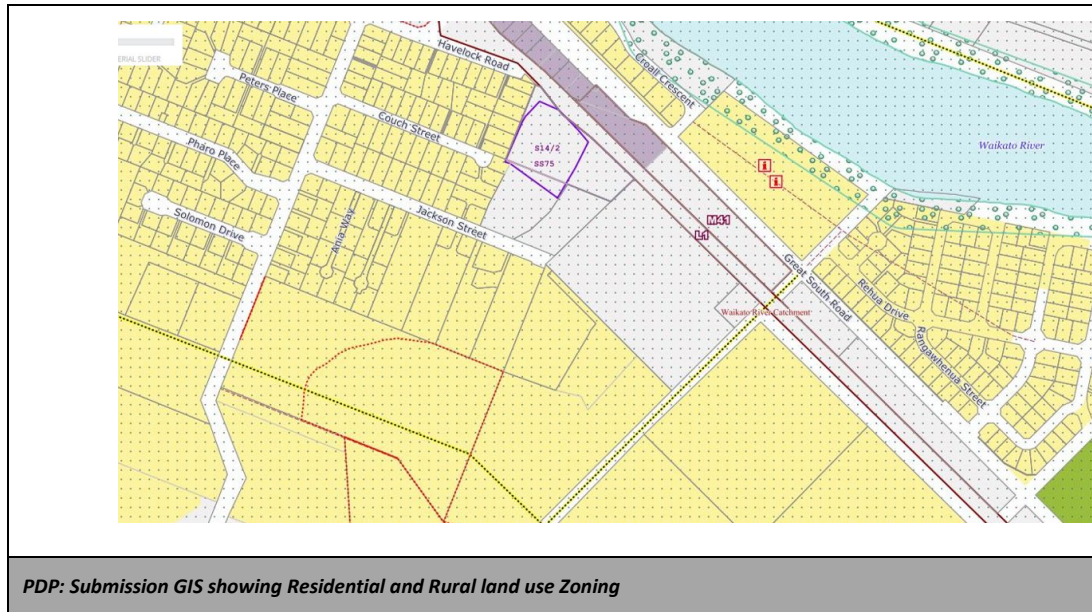
Lidar image of borrow pits surrounding Pukeahua Pa



Image of Rural Land adjacent to Pukeahua Pa (south) containing preserved borrow pit concentration



Example of degraded borrow pit sought to be preserved on 5851 Great Sounth Road



48. Notably, in submission point 962.1 and the subsequent hearing presentation, Ngati Tamainupo sought to define their interest the borrow pits located on Perjuli's property in relation to the proximity of the borrow pits to the culturally significant site of Pukeahua Paa.
49. However, it is unclear to Perjuli as to why other borrow pits, which are not separated from the Paa by a section of NIMT rail corridor and Great South Road, do not garner the same level of attention and the same levels of proposed protection for Ngati Tamainupo. This highlights the inconsistency and arbitrariness of singling out this particular site.
50. It is submitted that when the Panel deliberates on Submission point 962.1 - as well as the emotive hearing presentation by Ngati Tamainupo – the Panel should:
 - a) Apply appropriate weighting to the community expectations under the previous PC17 process (which rezoned 5851 Great South Road to Residential, with the presumption that this would mean further development and subdivision).
 - b) Recognise that seeking to apply MSOS status to this site is essentially arbitrary, and inconsistent with the level of protection (often no protection) given to other sites that do or may hold borrow pits.
 - c) Recognise that other sites are more appropriate to be assigned a higher level of cultural interest.
 - d) Acknowledge that assigning MSOS status to the site will impede development on the site and thereby undermine the integrity of the plan in respect of development and subdivision, at a time when there is a recognised shortage of housing.
51. Perjuli is concerned that any determination to restrict housing development on a site that is already zoned, publicly mandated, and required to meet local housing needs through an *ad hoc* and inconsistent cultural significance restriction will set an undesirable precedent to development projects across the wider Waikato District.

52. The suggestion by Dr Kahotea that Council should undertake an appropriately weighted and strategic management plan for all potential sites is a more reasonable mechanism than applying the cultural MSOS policy overlay.
53. The inconsistent approach to MSOS put forward under Submission point 962.1, and as accepted by the Council Planner, is not supported by Perjuli. It is arbitrary, may have concerning precedent effects, and will undermine the integrity both of existing planning frameworks and the PDP.
54. As Council's letter of 19 October 2020 notes, acceptance of the recommendations of the Council planner will mean that any earthworks will require a resource consent, and subdivision is likely to be inhibited (in order to avoid the MSOS being spread across multiple sites).
55. This highlights that a MSOS in relation to this site will frustrate its existing residential zoning and impede the ability to develop the property. In writing the section 42A report, Council's Planner appears not to regard this as a concern – see e.g. the comments at paragraph 141 - but Perjuli believes it is. Effectively the process of PC17 will be nullified, and Perjuli will be prejudiced by being unable to effectively develop a site it has purchased for development, based on PC17.
56. The s 42A report notes that there has been no general opposition to the s 32 report on MSOS, with only site-specific relief sought. Now that the direct contradiction between the developability of sites zoned residential and MSOS is understood, based on Council's position, general opposition might arise. The serious impediment to development again counters the s 42A report – a strategic assessment of MSOS would be preferable to simply placing this site as an MSOS as the s 42A report desires. This again highlights the limitations and partiality of the section 42A report.

Cultural Effects Mitigation

57. Perjuli has an established and legitimate presence in the area, not only in relation to ownership of the land at 5851 Great South Road, but also through the provision of needed housing supply associated with the River Terraces development immediately abutting the south of the subject property. The overall area is the subject of a quality housing development that is more affordable than many others in the region.
58. Perjuli has experienced a well-established relationship with mana whenua which is evidenced through Turangawaewae Board of Trustees supportive communications and their Cultural Impact Assessment. It is also relevant to note that cooperative communications and development understanding is evident through formal and informal communications with the author of Sub 962 (Kimai Huirama), and Mai Uenuku ki te Whenua Marae.
59. Given the long and established understanding between Perjuli and mana whenua, appropriate cultural acknowledgement and mitigation has been provided throughout the preceding 5 Stages of the River Terraces development. These examples include:
 - a) archaeological and cultural impact assessments;
 - b) ongoing collaborative consultation;
 - c) provision of landscape plantings;
 - d) establishment of appropriate signage;

- e) a commitment to providing pedestrian linkages between Pukeahua Paa and the Waikato River; and
- f) the establishment of rocks/boulders with plaques detailing cultural interests within the development envelope.

60. Perjuli wish for the hearing Panel to be aware that constructive and good faith consultation is enshrined within the River Terraces development to date – and furthermore, that such good faith consultation has been undertaken specifically in relation to the land at 5851 Great South Road.



- 61. It is unfortunate to now hear Perjuli being portrayed as somewhat insensitive to cultural interests as they relate to Ngāti Tamainupo concerns, as this is demonstrably not the case. Perjuli has dedicated a significant amount of time, effort and resources in to listening to and addressing cultural concerns on the site and surrounding areas.
- 62. Emotive comments and statements presented to the hearings panel by Submitter 962 to the effect that Perjuli have refused to meet and consult with Ngāti Tamainupo representatives are out of context, and furthermore are a distraction in determining the level of cultural significance or cultural interest of the property located at 5851 Great South Road.
- 63. Perjuli Developments Limited is a reputable land development firm and has a strong appreciation of the importance of collaboration with all stakeholders. Claims of a lack of consultation, cultural insensitivity, and disingenuous statements regarding timing of development already consented for 5851 Great South Road are irrelevant to the decision being sought under Submission point 962.1.

64. Perjuli seek that the hearings Panel disregard perceived development shortcomings underpinning the submission at the hearing and focus instead on the facts of Perjuli's engagement and track record on cultural mitigation and consultation.
65. Perjuli acknowledges that there are borrow pit remnants located on the property at 5851 Great South Road – however, the degree of interest or significance in these borrow pits has not been proven, and nor has Council's section 42A report taken a robust approach to their assessment. Further, the context of other recorded borrow pits in closer proximity to the Pukeahua Pa and the Ngaruawahia Golf Course is of interest, as these have not received the same level of consideration under Submission point 962.1.
66. It is reiterated that as this piece of land has been strategically considered through PC17 and the consented environment that a more balanced approach to environmental (including cultural significance) and Ngāruawāhia's urban growth pressures has been provided for.

Conclusion

67. Perjuli oppose submission 962.1 in its entirety as it relates to the highly modified and remnant borrow pits located at 5851 Great South Road, Ngāruawāhia.
68. Perjuli accepts that borrow pits in the area may be of historic and/or cultural interest to mana whenua. Some borrow pits are present on the property. However, there are also many borrow pits in areas nearby that are not part of the property. Further, the selective delineation of these features being significant under the MSOS policy overlay is arbitrary, ad hoc and inappropriate when considering the wider physical and planning environment.
69. Perjuli appreciates the ability to share their views of Submission 962.1 to the hearings panel, as well as to highlight its concerns over the assessment process underpinning the s42A report's recommendation to accept the submission. Perjuli reiterates its concerns that Council has seemed reluctant to allow Perjuli to submit on a significant matter affecting its property.
70. Perjuli seeks that the Hearings Panel decide not to accept Submission point 962.1 due to a number of process inconsistencies, undermining public expectations under PC17, potential precedent effects, and on the basis of Council's own technical recommendation to undertake a more strategic approach to the weighted preservation of the District's significant network of borrow pits.
71. Perjuli welcome the opportunity to elaborate on the matters presented in this written statement directly with Council and or the appropriate representative(s) of the PDP Hearings Panel, and if necessary to present further technical and expert information (including if necessary legal submissions).

Perjuli Developments Ltd

Dated the 6th day of November 2020