BEFORE A COMMISSIONER APPOINTED BY THE SELWYN DISTRICT COUNCIL

IN THE MATTER OF	the Resource Management Act 1991
AND	
IN THE MATTER OF	applications by KeaX Limited for resource consent to establish a solar array at 150 Buckleys Road, Brookside.

STATEMENT OF EVIDENCE OF STUART JOHN FORD

ON BEHALF OF THE APPLICANT

(HPL)

Dated: 16 February 2024

KeaX Limited
Applicant
Campbell McMath
(campbell@keaenergy.nz)

Applicant
PO Box 38
Leeston
7632 Canterbury
Phone: 021 104 5346

1 INTRODUCTION

1.1 My full name is Stuart John Ford.

1.2 I am a Director of The AgriBusiness Group and work as an agricultural and resource economist based in Christchurch. I have a Diploma in Agriculture and a Bachelor of Agricultural Commerce from Lincoln University and have undertaken post graduate studies in Agricultural and Resource Economics at Massey University.

1.3 I am a member of the New Zealand Agriculture and Resource Economics Society and the Australia Agriculture and Resource Economics Society. I am also a member of the New Zealand Institute of Primary Industry Management.

1.4 I have spent over thirty years as a consultant in the primary industries, with the last twenty five years specialising in agricultural and resource economics and business analysis.

1.5 I have given evidence to District and Regional Council hearings, Special Tribunals to consider Conservation Orders and the Environment Court in my capacity as an agricultural and resources economist.

1.6 My specific experience which relates to the capacity of soils and their value for productive uses and as relates to the National Policy Statement on Highly Productive Land (NPS-HPL) includes my working for both applicants and Councils. I have experience in relation to the productive capacity of elite / highly productive soils in the Auckland District which was gained from my role as a consultant resource economist for HortNZ.

1.7 This experience includes:

(a) Evidence to the Auckland Council on their Proposed Auckland Unitary Plan for a number of parties in relation to elite and prime soils.

(b) Evidence given on behalf of Auckland Council to the Environment Court in relation to the appeal of the Self Family Trust in regard to a land zoning decision on elite soils.

(c) Evidence given to an Auckland Council hearing as to the appropriate zoning of land at Clevedon.

(d) Initial report on the productive potential of land owned by Strategic Land Holdings at Waiau Pa.

(e) Support for Auckland Council in preparing a Section 42A report on a development proposal at Patumahoe South in relation to the productivity of the land.

(f) Support for Auckland Council in preparing a Section 42A report on a development proposal at O'Hara Waiuku in relation to the productivity of the land.

(g) Provision of evidence to the Environment Court on the productive potential of the land known as Sticky Forest adjacent to Wanaka.

(h) Reports on the agricultural productivity and commercial viability of land and its status under the NPS-HPL for a number of different submitters to the Selwyn District Council.

(i) Support for the Waimakariri District Council in preparing a Section 42A report on a development proposal at Ohoka in relation to the productivity and the commercial viability of land.

(j) I have been engaged in a large number of assessment that relate to the impacts of the National Policy Statement on Highly Productive Land (NPS-HPL) across New Zealand.

1.8 I was engaged by KeaX Limited to address the National Policy Statement on Highly Productive Land, in particular Section 3.9, in respect of a proposed solar array on Buckleys Road, Brookside. Specifically my assessment has involved:

(a) A site visit to assess the site and an assessment of the impact of two different solar arrays in close proximity.

(b) Preparation of a report on the impact of the proposal in terms of the loss of any HPL land.

(c) Preparation of this evidence.

1.9 In preparing this evidence, I have reviewed the following:

(a) The resource consent applications for the Proposal (including the AEE);

(b) The evidence of Mr McMath (the Applicant);

(c) The evidence of Mr Beechey-Gradwell; and

(d) The evidence of Ms Kelly (Planner).

(e) The submissions of Donna Irons, and Simon Robinson, Ewan John Chapman, Anneka Rose Dalley, and Michael John Dalley Haurere Farms, Katrina Marie Deans, and Corey Krygsman, Glenmore Farming Co and Clark James Casey, and Independent Trustees (Canterbury) Limited;

(f) The Section 42A report for Selwyn District Council;

1.10 Whilst this is a Council hearing, I acknowledge that I have read and agree to comply with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2 EXECUTIVE SUMMARY

2.1 The Site contains approximately 92% of LUC 2 and 8% of LUC 3. All land is automatically defined as HPL under the NPS-HPL if it is Class 1,2 or 3 and rurally zoned.

2.2 The Site will be used for dual purposes: providing renewable energy to the Orion network and undertaking primary production. This dual use activity is referred to as Agrivoltaics.

2.3 I consider it reasonable to assume that the pasture that is grown within the Site will conform to the study carried out by Dr D Donaghy of Massey University. This study found the grass between the fixed (?) panels grew at a rate 40% more than grass growth without any panels above. The area under the panels grew at 84% less than the area

without the panel above. Overall, the net difference in grass growth in the structure area is approximately 9% more grass than the area without the structures.

2.4 For the single axis tracker panels there is no reduction in pasture growth under the panels so I consider up to 140% of pasture growth under the structure could be expected compared to what would be grown in a straight farming situation or traditional farming methods.

2.5 Berry fruit including strawberries, blackberries, blueberries, loganberries and black currents could all be grown between the rows on this site. I am aware that Lincoln University intends to grow blueberries between the rows on their AgriVoltaic farm which they are just setting up.

2.6 The CEC report quotes examples of vegetable crops that have grown successfully in conjunction with solar in the USA. These include Tomatoes, Jalapenos, Kale, Chard and Broccoli. All reports quote the yield is similar or up to double the conventional yield and that water efficiency is improved significantly.

2.7 When considering the issue of actual loss or potential cumulative loss of the availability and productive capacity of highly productive land, I am of the opinion that:

(a) The Proposal allows for the land to support land based primary production in the long term both as enhanced pastoral production and in the potential for horticultural production.

(b) When assessed against the physical characteristics criteria I find that the soil type and properties are not diminished at all under the Agrivoltaic proposal.

(c) The range of primary production activities that can be undertaken on the land will be reduced as it may not be possible, for example, to graze large animals amongst the panels or grow particular crops. However, it is possible to use it for some pastoral activities and high value horticultural activities (including utilising the shade provided by the panels) which are at the upper end of land uses in terms of the potential returns, employment, wellbeing and flow on economic impacts.

(d) The other two criteria of legal constraints and the size and shape of existing and proposed land parcels are not relevant to this Site.

2.8 It is my opinion that the proposed land use of Agrivoltaics meets the requirements of the NPS-HPL in that it minimises the actual loss of any HPL and productive capacity as it allows for the land to support land-based primary production in the long term.

3 SCOPE OF EVIDENCE

3.1 My evidence addresses:

(a) The Soils and Land Use Capability of the site;

(b) The Proposal;

(c) The assessment undertaken of the potential impact of Section 3.9 of the NPS-HPL;

(d) The submissions which raise the three issues of;

(i) The potential impact of heavy metals affecting the ability to grow and market the product.

(ii) The compromise or loss of HPL.

(iii) The impact of the arrays on the productive capacity of the land.

(e) The s42A Selwyn District Councils Officer's Report in relation to the Proposal.

4 THE PROPOSAL

4.1 Of relevance to highly productive land, the Proposal (as limited notified) seeks consent to construct and operate a 111ha solar array on the Site which will generate around 100GWH of energy per year on completion. The solar array will comprise a total of around 140,000 tracking panels with thirteen inverters. Each table of panels will be set to a maximum height of 3.0 metres from ground level to the top of the solar panels, whilst the lowest point will be 0.5 metres (typically 1 metre) above ground level. However, the panels will initially be tilted

to achieve a maximum height of 2 metres above ground level, recognising the height of newly established vegetation.

4.2 While not proposed to be installed as a part of the initial site works, KeaX may install batteries on the Site in the future to actively manage rapid drops in power and fluctuations.

4.3 It is also proposed to (not exclusively):

- undertake site preparation works i.e. the removal of all existing internal fencing, shelterbelt plantings within the Site and structures such as irrigators and, fence around the Wāhi Taonga Management Site – C59;
- undertake exotic planting as shown on the Site Plan;
- create internal access roads between the panels using flattened grass areas, with shingle as required to reduce the build-up of mud and tracking of sediment off-site;
- undertake primary production activities on the Site;
- undertake approximately 7,020.5m³ of earthworks to install the piles (to a depth of 1.8m) and cable trenches, which will be backfilled once the cables are in place.

5 THE SOILS AND LAND USE CAPABILITY OF THE SITE

5.1 The Site with the approximate boundaries and Land Use Capability (LUC) classes are shown in Figure 1.

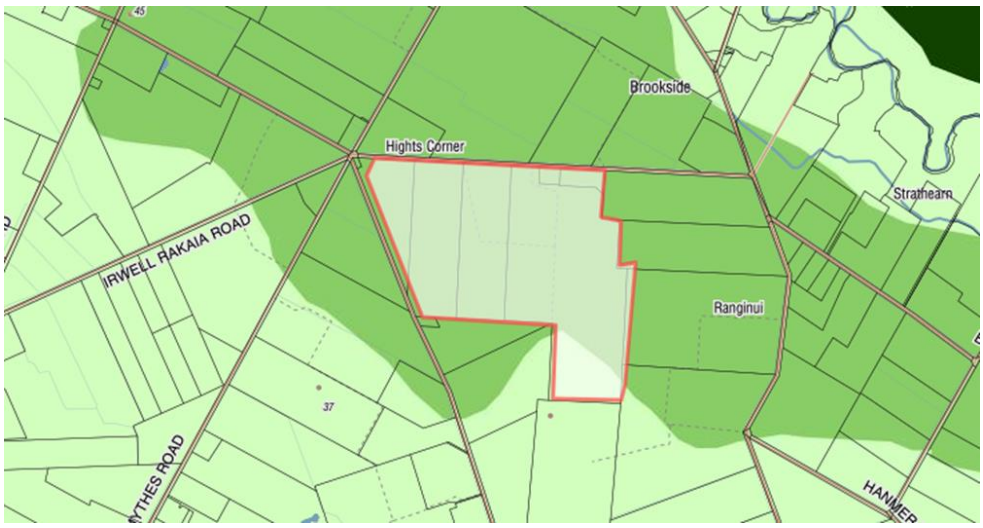

Figure 1: Location of the site and the LUC classes that it occupies. The darker green is LUC 2 and the lighter green is LUC 3. (OURENVIRONMENT website Landcare Research)

5.2 The Site contains approximately 92% of LUC 2 and 8% of LUC 3.

5.3 All land is automatically defined as HPL under the NPS-HPL if it is Class 1,2 or 3 and rurally zoned.

5.4 The soil type as shown on SMap is 67% Ayreburn soil and 33% Leeston soil.

5.5 The key properties of these two soils are shown in Table 1.

Table 1: Physical properties of the soil types present as listed in SMap.

Soil Name	Ayreburn	Leeston
SMap Name	Ayreburn_3a.1	Leeston_1a.1
Depth Class	Moderately Deep (45 to 90 cm)	Shallow (20 to 45 cm)
Rooting Depth	70 to 100 cm	70 to 100 cm
Depth to stony layer	Moderately Deep	Shallow
Texture profile	Clay	Clay
Topsoil stoniness	Stoneless	Slightly Stoney
Drainage class	Poorly Drained	Poorly Drained
Profile Available Water (0 to 100 cm)	122 mm	111 mm

5.6 The Ayreburn soils are moderately deep soils whilst the Leeston soils are shallow. They are both clay soils that are poorly drained and have a high level of Profile Available Water.

6 GRASS GROWTH BENEATH THE PANELS

6.1 The Site will be used for dual purposes: providing renewable energy to the Orion network and undertaking primary production. This dual use activity is referred to as Agrivoltaics.

6.2 It is proposed that the panels will be set out as a single axis tracker system.

6.3 The single axis tracker panels will be constructed as shown in Figure 2. The panels are approximately 1.30m wide and approximately 2.38m long. When flat/horizontal (in stow position) they are approximately 1.8m above the ground and can be typically be 1.0m above the ground and no more than 3.0m above the ground (during maximum tilt). They are on piles that are driven into the ground approximately 1.8m and the piles are approximately 8.0m apart. It is proposed that the rows will be approximately 4.0m apart (edge of panel to edge of panel) (when the panels are flat), 6.5m from pile to pile.

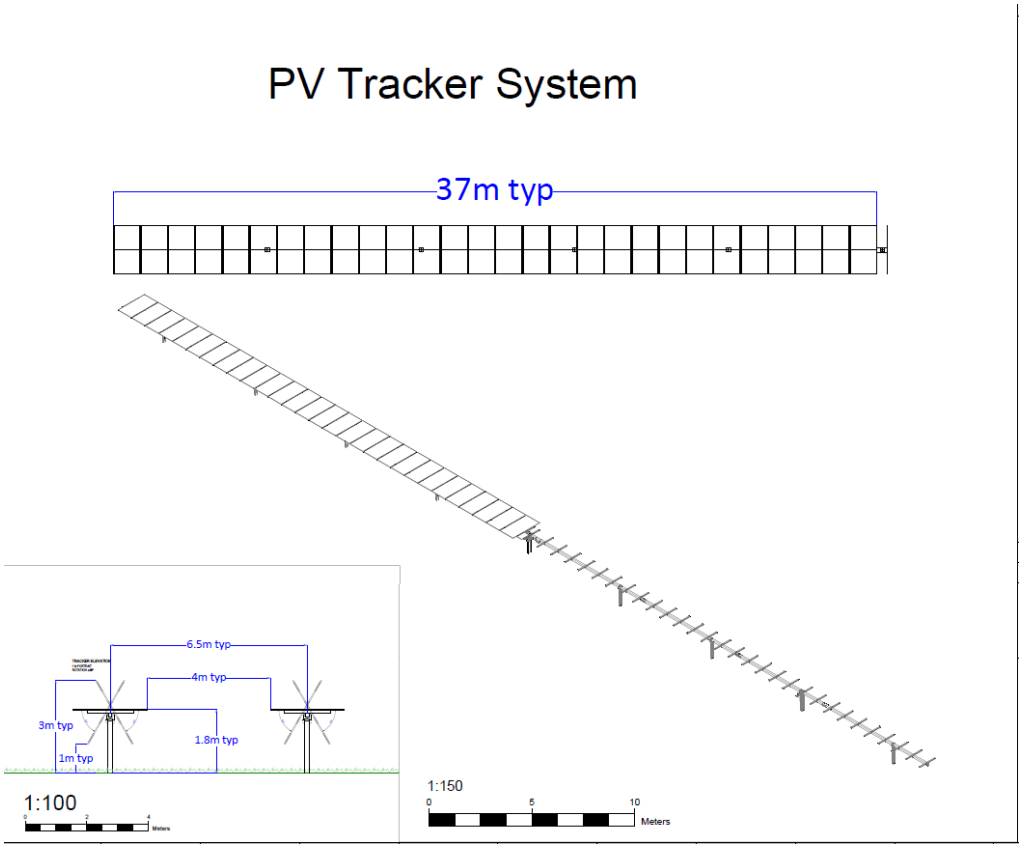

Figure 2: Diagram of the PV tracker system.

6.4 Primary production is proposed to be initially in the form of lamb finishing but there is a range of potential production opportunities open to the land including intensive horticultural production.

6.5 I consider it reasonable to assume that the pasture that is grown within the Site will at least conform to the study carried out by Dr D Donaghy

of Massey University[1]. This study considered the impact of fixed panels on grass growth, where's KeaX propose to install tracker panels, and found the grass between the panels grew at a rate 40% more than grass growth without any panels above. The area under the panels grew at 84% less than the area without the panels above. Overall, the net difference in grass growth in the structure area is approximately 9% more grass than the area without the structures.

Without structures: (8m between the panels x 1) + (3m under the panels x 1) = 11

With structures: (8m between the panels x 1.4) + (3m under the panels x .26) = 11.98

Difference: 11.98 / 11 = 1.09.

6.6 Dr Donaghy attributed this increase in grass growth to the fact that the panels offer a microclimate which keeps the soil temperature marginally lower during the day and marginally warmer at night and reduces the amount of moisture lost through evapotranspiration.

6.7 For single axis tracker panels, as is proposed here, there is very little reduction in pasture growth under the panels because there is much more exposure to sunlight under the tracker panels. Based on Dr Donaghy's study, I consider up to 140% of pasture growth under the structure could be expected compared to what would be grown in a straight farming situation or traditional farming methods.

6.8 A recently published review of the potential for Agrivoltaics to contribute to the economic output of farms in Canterbury[2] traversed the issue of the impacts of agrivoltaics on agriculture from a literature review and on the issue of forage considerations concluded that:

> *"The impact of integrating agrivoltaics systems is dependent on site-specific conditions, characteristic of the specific plant, and*

[1] https://www.stuff.co.nz/environment/climate-news/132295902/solar-panels-could-supercharge-some-pasture-growth--study
[2] Vaughan. A, et al (2023): Agrivoltaics: Integrating Solar Energy Generation
with Livestock Farming in Canterbury Prepared for Our Land and Water Rural Professionals Fund 2023

the design and configuration of the panels. Improving water use efficiency and improving production are potential benefits to be offered by a successful integration of solar and pastural farming."

6.9 This is backed up by an Australian report [3] which has been published by the Clean Energy Council (CEC) which noted that Agrivoltaics was first proposed in Germany in 1981. "*Since then, local and international trials and research, particularly in the past five years, have shown that solar energy and agricultural production can be highly compatible and mutually beneficial" and it also reports that Solar Power Europe stated in 2020 that "*"*Agri-PV allows for solar to be combined with specific rural and agricultural activities, providing solutions to the needs of farmers and rural communities by driving investments and creating jobs in rural areas, supporting traditional and sustainable agricultural practices, or increasing the climate resilience of agricultural activities*".

6.10 The report states "*While Australian studies are currently underway, recent international studies suggest that the growth rate of certain crops is not reduced under solar panels and indeed can even improve the performance of some crops. The key possible reasons for these improved outcomes are outlined below.*

(a) *Reduced exposure to sun and extreme weather events.*

(b) *Soil moisture is enhanced, and temperature extremes are reduced.*

(c) *Ambient temperatures were improved*."

6.11 The combined factors of a reduction in extreme temperatures (both high and low), improved average temperatures and reduced evapotranspiration all contribute to enhanced plant growth and would support the findings of Dr Donaghy.

6.12 The experience to date in Canterbury is different to Dr Donaghy's research results with the pasture under panels being as strong in

[3] Clean Energy Council (2021): Australian guide to Agrisolar for large-scale solar.

growth as the pasture not under the panels. This may be due to both the quality of the land and the structure of the solar panels.

6.13 Agrivoltaics is a very advanced farming technique in the USA with the American Solar Grazing Association [4](ASGA) which promotes the dual use of grazing and solar production across the USA and the ASGA website has a vast amount of information and research papers on the grazing of sheep on solar farms and lists the following Universities who have published research papers on the activity of grazing within solar farms.

(a) Cornell University

(b) Oregon State University

(c) National Renewable Energy Laboratory (NREL)

(d) Additional Research & Private Research Institutions

(e) International Research

(f) Ohio State University

(g) New York State Energy Research and Development Authority (NYSERDA)

6.14 The CEC report quotes examples of vegetable crops that have grown successfully in conjunction with solar in the USA. These include Tomatoes, Jalapenos, Kale, Chard and Broccoli. All reports quote the yield is similar or up to double the conventional yield and that water efficiency is improved significantly.

6.15 According to the National Renewable Energy Laboratory (NREL) in the USA, agricultural crops can thrive underneath the partial shaded conditions of solar installations, with panels creating the following environment for plants grown under or around the panels:

(a) reducing the amount of direct sunlight reaching the crops and reducing sunburn on crops

[4] https://solargrazing.org/

(b) creating cooler conditions during the day and warmer conditions at night

(c) reducing heat stress as well as reducing risks of frost damage

(d) extending growing seasons in multiple regions

(e) increasing soil moisture levels, which can lead to a reduction in irrigation needs.

6.16 Berry fruit including strawberries, blackberries, blueberries, loganberries and black currents could all be grown between the rows on this site. I am aware that Lincoln University intends to grow blueberries between the rows on their Agrivoltaic farm which they are just setting up.

6.17 The CEC report also mention that in Australia they are researching the growing of permanent crops like pears, apples and even vineyards on Agrivotlaic properties.

6.18 The current land use is an irrigated dairy farm. The Site is within ECan's Selwyn Waihora water zone, which is a Red Zone. This means that it is above the allowable allocation of Nitrogen leaching and irrigation water extraction. Dairy farms are required to reduce the amount of Nitrogen leaching by 30% and on renewal of a consent to extract water for irrigation it must prove that it is efficient in its water use and if the irrigation consent is transferred to another site it must surrender 50% of its current allocation.

6.19 The conversion across to the proposed Agrivoltaic farming operation will have positive effects for Nitrogen by reducing the amount of Nitrogen leaching significantly and enabling the more efficient use of consented water due to the reduced evapotranspiration. It is proposed that irrigation does continue on the Site.

6.20 These are both positive outcomes for the environment and for the sustainability of the land.

7 ASSESSMENT OF SECTION 3.9 (3)

7.1 Section 3.9 (3) of the NPS-HPL states:

(3) *Territorial authorities must take measures to ensure that any use or development on highly productive land:*

(a) minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district; and

(b) avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development.

7.2 In the document "National Policy Statement for Highly Productive Land – Guide to Implementation March 2023" it states:

Clause 3.9(3)(a) requires territorial authorities to focus on minimising or mitigating any actual loss or potential cumulative loss of the availability and productivity capacity of HPL, when considering any proposed use and development on HPL. When considering if a use or development "minimises" or "mitigates" a loss of productive capacity, territorial authorities should consider:

(a) *the location of the activity – whether it can be sited somewhere on the subject site that minimises the impact on the productive capacity of HPL*

(b) *the footprint of the activity – whether efforts have been made to keep the footprint of the activity as small as possible to minimise the actual loss of HPL*

(c) *clustering of activities – whether there is an option to group a number of activities in a similar location to mitigate the cumulative loss of HPL that would occur through activities being spread out across a wider area of HPL (eg, clustering of buildings, co-location of telecommunications infrastructure or containing multiple activities in the same building, such as using an existing residential dwelling for a home business or visitor accommodation activity, rather than constructing multiple buildings)*

(d) *co-existing with land-based primary production – whether the activity can be designed in such a way that is does not preclude being able to carry out land-based primary production around*

the activity (eg, the potential for using the land around specified infrastructure to be used for vegetable production or animal grazing).

7.3 The productive capacity of the land is defined in the NPS-HPL as:

"*productive capacity, in relation to land, means the ability of the land to support land-based primary production over the long term, based on an assessment of:*

(a) physical characteristics (such as soil type, properties, and versatility); and

(b) legal constraints (such as consent notices, local authority covenants, and easements); and

(c) the size and shape of existing and proposed land parcels. Minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land.

7.4 It is my opinion that this Proposal both minimises and mitigates any actual loss of HPL under consideration of the relevant factors of:

(a) The location of the activity. For the solar part of the Agrivoltaic enterprise to be economically viable and enable the efficient use of existing transmission infrastructure, it must be located close to a substation. The Brookside substation is directly adjacent to the Site.

(b) The footprint of the activity. The Solar part of the operation covers around 30% of the land area. However primary production will still take place on the 30% that will be covered by the panels. This means a large proportion of the land will be available for primary production.

(c) The issue of clustering of activities is not relevant to this Proposal.

(d) It is possible for the Proposal to co-exist with land-based primary production as it is possible to carry out land based production within the Site, as I have outlined in detail above.

7.5 Overall, from my area of expertise, I consider the Proposal satisfies the requirements of Section 3.9(3) of the NPS-HPL.

7.6 Considering the NPS-HPL more generally, particularly its overall objective of protecting highly productive land for use in land based primary production, both now and for future generations, I consider the Proposal is consistent with the NPS-HPL.

8 **Submissions**

8.1 The submissions received that are relevant to my area of expertise can be summarised as addressing the following submission points:

(a) The potential impact of heavy metals affecting the ability to grow and market the product.

(b) The compromise or loss of HPL.

(c) The impact of the arrays on the productive capacity of the land.

8.2 I refer to Mr McMath's and Dr Beechey-Gradwell's evidence in relation to the fact that there is no scientific or practical evidence to support the submitters contention that heavy metals are likely to affect the soil under the panels.

8.3 I also advise that there is no practical or scientific evidence to support the contention that there is any potential negative effect on the ability to grow and market produce grown within an Agrivoltaic production system. In fact the New Zealand and international experience supports my opinion that a wide range of crops are able to be produced and a wide range of animals can be grazed within the arrays and the produce from this is able to be marketed satisfactorily i.e. it is safe for human consumption.

8.4 As I have pointed out in this evidence and as concluded in the s42A report the adverse effect on highly productive land will be minimal.

8.5 As I have shown in this evidence the impact of the arrays on the capacity of the land to produce pasture is at worse minimal and in fact is most likely to be positive as is reflected in the results from the New Zealand trial. While the ability to grow the full range of possible crops

is somewhat restricted the impact of that restriction is limited to an extent that it is considered to be less than minor.

9 SECTION 42a OFFICER'S REPORT

9.1 I have reviewed the s42A report for Selwyn District Council (SDC) in relation to KeaX Limited's land use consent application.

9.2 At Paragraphs 135 to 139 of the s42A report it references the peer review of my NPS-HPL report by Mr. Jamie Gordon, MacFarlane Rural Business Limited (MRB), and notes that " *Mr Gordon's evidence focuses on pastoral production*…" and that "… *the most probable activity once the solar array is completed will be sheep breeding or finishing, as well as conserving or selling silage or baleage*." And that "*the application does not contain detail on how the property, pastures, crops and livestock would be managed*" and that "*it is potentially more significant that the applicant can undertake good pastoral management practices under the solar panels" and that "the utilisation and control of pasture during high growth periods will require extra livestock feed demand and/or mowing and removal of the surplus feed*" and that "*fencing subdivision will be important to enable good grazing management and livestock movement*," and that "*Renewal and maintenance of pasture and weed control will be required to optimise pasture and livestock production*".

9.3 It is my opinion that in the examples quoted that Mr Gordon is offering his opinion on what would make up a satisfactory farm system that could be implemented despite the Disclaimer at the beginning of his report[5].

9.4 In Mr Gordons report at Section 4 Farm Production he traverses his views of the possible farming systems that could be used within the Agrivoltaic system and ventures his views of some of the practical considerations that would be necessary to achieve a level of productivity of the system and concludes that "*Failure to implement these key programmes and infrastructure could reduce the* ***productive potential*** *of the land. Specialist equipment maybe*

[5] This report "does not constitute farm system, legal or accounting advice, and users should take specific advice from qualified professionals before taking any action based on information in this publication."

required to fit along the rows and under the bottom edge of the panel. For the efficient use of machinery, consideration needs to be given to the drive mechanism of the solar panels and the turning room for tractors and implements at the end of rows as discussed in section 3." (my emphasis)

9.5 In his summary section he then states "*Regardless of the farm system, it is important that **productivity** is maintained on as much of the land as possible, with the greatest risk of lost **productivity** being close to the piles. Minimising the loss of **productivity** will require appropriate infrastructure and management practises to farm under the solar panels*." (my emphasis)

9.6 With due respect, the farm system practiced or any consideration of productivity of the land are not relevant to the requirements of the NPS-HPL. The matter to be considered under the NPS-HPL is the productive capacity of the land which is a quite different consideration from the farm system practice or the productivity of the land.

9.7 I am of the opinion that the material that is discussed in Paragraph 136 to 139 is not relevant to consideration under the NPS-HPL and that Mr Gordon's view of what is the most likely land based primary production system nor his opinion on the likelihood of removal of silage / pasture are relevant to an assessment of the impact of the NPS-HPL on the proposal.

9.8 At Paragraph 137 Mr Gordon is quoted as offering his opinion that "*the 500mm maximum panel tilt height would be too low for sheep to comfortably move under*." While I disagree with Mr Gordon's opinion, I would note that the experience of KeaX and other owners of Agrivoltaic arrays is that the tilt height of the panels does not negatively affect the sheep's ability to graze the pastures but may have some temporary negative impact on the sheep's ability to roam freely across the site. It is my opinion this impact is exactly the same as the impact of fencing both temporary and permanent.

9.9 I do agree with the conclusion of Mr Gordons report that "*the potential productive capacity would be maintained*" and that of the s42A author as to consideration under the NPS-HPL that "*the adverse effect on highly productive land will be minimal*."

10 CONSENT CONDITIONS

10.1 I have reviewed the draft proposed consent conditions to be attached to the planning evidence of Ms Kelly and confirm that they reflect my recommendations.

Stuart John Ford

16 February 2024