

BEFORE THE QUEENSTOWN-LAKES DISTRICT COUCIL

IN THE MATTER of a hearing on submissions to the Proposed Queenstown Lakes District Plan pursuant to clause 8B of the First Schedule to the Resource Management Act 1991

ON BEHALF OF **UPPER CLUTHA TRANSPORT LIMITED**
Submitter (3256)

**EVIDENCE OF BENJAMIN ESPIE
(LANDSCAPE ARCHITECT)**

29th MAY 2020

1. INTRODUCTION

- 1.1 My name is Benjamin Espie. I reside in Queenstown. I hold the qualifications of Bachelor of Landscape Architecture (with honours) from Lincoln University and Bachelor of Arts from Canterbury University. I am a member of the Southern Branch of the New Zealand Institute of Landscape Architects and was the Chairman of that branch between 2007 and 2016. Since November 2004 I have been a director of Vivian and Espie Limited, a specialist resource management and landscape planning consultancy based in Queenstown. Between March 2001 and November 2004 I was employed as Principal of Landscape Architecture by Civic Corporation Limited, a resource management consultancy company contracted to the Queenstown Lakes District Council (**QLDC**).
- 1.2 The majority of my work involves advising clients regarding the protection of landscapes and amenity that the Resource Management Act 1991 provides and regarding the landscape provisions of various district and regional plans. I also produce assessment reports and evidence in relation to proposed development. The primary objective of these assessments and evidence is to ascertain the effects of proposed development in relation to landscape character and visual amenity.
- 1.3 Much of my experience has involved providing landscape and amenity assessments relating to resource consent applications and plan changes both on behalf of District Councils and private clients. I have compiled many assessment reports and briefs of Environment Court evidence relating to the landscape and amenity related aspects of proposed regimes of District Plan provisions in a number of districts. I have provided Environment Court evidence in relation to the appropriate management of landscape character and visual amenity in various parts of the Upper Clutha Basin, in relation to the formulation of the District Plan (both Operative and Proposed), a number of proposed plan changes and many resource consent applications.
- 1.4 I have read the Code of Conduct for Expert Witnesses contained within the Environment Court Practice Note of November 2014 and agree to comply with it. This evidence is within my area of expertise, except where I state that I am relying on information I have been given by another person. I confirm that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed herein.

- 1.5 In preparing this evidence I have reviewed the relevant parts of a Section 42a report prepared by Mr Luke Place on behalf of the QLDC and a statement of evidence prepared by Mr Mathew Jones. I have also considered Part 2 Strategy (Chapters 3 to 6) of the decisions version of the Proposed District Plan (**PDP**) and the associated interim decisions of the Environment Court that relate to this part of the PDP¹.

2. SCOPE OF EVIDENCE

- 2.1 The purpose of this evidence is to assist the Hearings Panel on matters within my expertise of landscape architecture and landscape planning in relation to Submission 3256 on the PDP. In relation to this submission, I have been asked by the submitter to prepare evidence in relation to the landscape and visual effects of the proposed area of General Industrial Zone (**GIZ**), or alternatively Rural Industrial Sub Zone, on the periphery of Luggate.

3. EXECUTIVE SUMMARY

- 3.1 In relation to the proposed area of GIZ, Mr Jones' evidence expresses general agreement that the relevant area can absorb activity as anticipated by the GIZ, provided that some more detailed landscape analysis and assessment is provided. Analysis and assessment work have now been done as is set out in this evidence. I consider that the relief that is now sought is appropriate in terms of its landscape and visual effects and I consider that Mr Jones' suggestions have been appropriately met. I consider that in the alternative, the activities anticipated in the Rural Industrial Sub Zone, as described in the evidence of Mr Edgar, can equally be absorbed into the relevant area.

4. THE PROPOSED AREA OF GENERAL INDUSTRIAL ZONE AND ITS CONTEXT

- 4.1 The submission describes the site in general terms. The site and its immediate context are shown on Appendix 1 of this evidence. I give the following summary description:

¹Environment Court decisions [2019] NZEnvC 160, 205 and 206.

- The landholding on which the area of GIZ is sought is 13.89ha in area and sits on the eastern side of Church Road near Luggate township. The area of proposed GIZ (the submission site) is 8.02ha.
- A closed landfill occupies the northern portion of the site which takes the form of a rough open area of rank grass, gorse/broom and stonecrop (*Sedum* acre). The remainder of the area of proposed GIZ is vegetated in mature pine trees and features undulating terrace landform. The part of the landholding that is proposed by the submission to remain Rural Zone, takes the form of open grassed terrace land.
- The Luggate Sawmill and a venison and deer velvet processing factory occupy the allotment of land to the immediate southwest of the submission site. This land is zoned Rural Industrial Sub-Zone by the PDP and I understand is not subject to any relevant appeals.
- The lot to the immediate northeast of the site (the Rhodes site) includes a number of industrial activities such as truss and framing fabricators and electrical contractors. This site is within the Rural Zone and these industrial land uses occupy a lower terrace area in the northern part of the relevant lot.
- A public walking and cycling track runs along the public land that lies to the immediate east of the site. This land is part of the corridor of the Clutha River and takes the form of a relatively steep unkempt bank. The track sits in undulating land at the top of the bank but is lower in elevation than the subject site, generally by a few metres. This track is part of a local (and broader) network and connects the Red Bridge to Luggate township and beyond.
- Across Church Road to the northwest of the site is a large triangle of rural land bounded by Church Road, State Highway 6 and State Highway 8A that comprises seven properties which take the form of large rural living properties.
- With reference to PDP Map 11a (decisions version), the corridor of the Clutha River is an Outstanding Natural Landscape (**ONL**). The ONL takes in the public land on which the aforementioned track sits. Close examination of the QLDC GIS application, shows

that a very small sliver of the easternmost part of the proposed GIZ sits within the identified ONL.

- Views into the site are limited due to the cover and enclosure provided by the relatively dense pines. The site can be observed from Church Road and from the walking/cycle track to the east and it generally appears as unkempt and tree-covered. The closed landfill area appears as unimproved and unmanaged open land.

4.2 Appendix 2 of this evidence is a plan showing the contours of the submission site overlaid on an aerial photograph. It can be seen that the bulk of the proposed GIZ² area sits on a relatively flat terrace, with the southwestern part of the proposed zone occupying sloping land that ascends (relatively gently) to the neighbouring sawmill site and the south-eastern corner of the proposed zone area stepping down to another small rough terrace. Obviously, the closed landfill part of the site has been heavily modified and earthworked in the past, although it now is relatively flat. The forested area that is proposed to be rezoned is of variable terraced topography and there are a number of areas within the trees that appear to have been earthworked to some degree in the past. There are various bits of debris and detritus present within the forested area. I am unaware how much past modification has taken place within the forested area.

4.3 The broader context of the site is shown on Figure 1 of Mr Jones' evidence and on my Appendix 1. Luggate Creek runs nearby to the east of the landholding on which the site sits. Luggate Creek joins the Clutha at an area known as The Nook and the public track that runs to the immediate east of the site joins with the Luggate Creek track that runs on the southern side of Luggate Creek so as to connect to Luggate township.

4.4 The southern part of the landholding on which the proposed GIZ sits (which is proposed to remain as Rural Zone), takes the form of a legible, open terrace peninsula which sits between Luggate Creek and the Clutha. This is a visually interesting and apparently entirely unmodified landform that has been shaped by the actions of the creek, on its southwestern side, and the river, on its north-eastern side.

² I understand that Mr Place suggests Rural Industrial Sub Zone as a potential alternative to General Industrial Zone over the area that is proposed to be rezoned. Provided that the bespoke provisions that are proposed eventuate (i.e. the 20 metre setbacks), I consider that the Rural Industrial Sub Zone would bring about a very similar result to the General Industrial Zone.

- 4.5 Church Road is a sealed but relatively narrow road and connects SH6 to Kane Road via the Red Bridge. Leaving SH6 and the Settlement Zone of Luggate, Rural Lifestyle Zone occupies the eastern side of the first part of Church Road, as far as the Luggate Creek. Immediately beyond (north of) Luggate Creek sit the sawmill and deer factory operations. This instance of industrial activity and also the one on the Rhodes site, further north beyond the submission site, include a number of buildings and associated visible industrial activity which is plainly seen from the road. These land uses strongly influence the character of the road corridor and experientially connect the area to Luggate. The vicinity is experienced as an outskirts-of-town or urban fringe area, rather than a truly rural area.

5. EFFECTS ON LANDSCAPE CHARACTER

- 5.1 As discussed above, the submission site is part of an urban fringe area in terms of landscape character. Industrial activities on neighbouring sites are an important influence on how the landscape setting is experienced. Also relevant is the past use of the site as a landfill and the unkempt, treed management of the site. In its context, as described above, I consider that there is broad scale landscape planning logic in using the site for industrial activities. In terms of landscape character, activities of this sort are not significantly discordant with the current patterns of the landscape in this location. They will not be an element of contrast with their setting.
- 5.2 Given that the southern part of the relevant landholding is outside of the submission site (i.e. it is proposed to remain in its current Rural Zone zoning), I consider that no parts of the submission site are more sensitive than others in relation to landscape character. The unkempt pine forest land being similarly sensitive to the closed landfill in my opinion. Spreading industrial land uses onto the southern part of the landholding would have encountered some significant landscape character restraints in my opinion, relating to the pronounced and legible landform in that part of the landholding.
- 5.3 The notified provisions of the GIZ provide for industrial activities but with significant regulation and control. Landscaping and external appearance of buildings are generally a matter of control or discretion at the time a resource consent is applied for in relation to some proposed industrial use and buildings. In terms of landscape character, I do not see that the relevant provisions will enable a result that discords with its setting. Unusually high, or visually conflicting buildings or

activity will not be enabled. Design, including landscaping, will be (at least) controlled by the Council.

6. EFFECTS ON VIEWS AND VISUAL AMENITY

6.1 Given my finding above that the presence of industrial activities as enabled by the proposed zoning will not be discordant with the landscape character of their setting, I consider that the main sensitivities, constraints and opportunities that require analysis regarding the submission site relate to views and potential visual effects.

6.2 The submission site is relevantly visible from two aspects; the Church Road frontage and the Clutha River corridor, including the relevant public track. I discuss these two aspects below.

Church Road

6.3 As discussed above, dense pine forest vegetation that covers much of the submission site prevents views into or across the site to the broader landscape. As such, when travelling north-east from Luggate township, the existing sawmill, venison/velvet factory and then the dense forest cover of the site provide a continued visual frontage on the eastern side of the road. The visual experience is such that there is still a perception of being within the urban fringe of Luggate township.

6.4 Once a road user reaches the northernmost part of the submission site, they have visual access over the closed landfill. The speed limit on this part of Church Road is 100kmph. The frontage of the submission site that is not heavily treed and that allows views across the landfill is 150m in length. The views to the east for a user of this stretch of road are long, the Grandview Range being visible and forming the skyline. Similar views to the east from this stretch of Church Road continue until a viewer reaches the industrial land use to the north of the submission site and begins to descend towards the Red Bridge. The western side of the road for this stretch, takes the form of the Klingenberg property which is densely planted in eucalypt forest (as can be seen on Appendix 1 to this evidence).

- 6.5** It is relevant that the proposed relief includes significant setbacks for buildings from Church Road. Additionally, landscape treatment is a matter over which Council retains control. If the submission site is developed in accordance with the proposed relief, it is reasonable to expect some significant built form within the central part of the submission area. There may also be yard spaces and vehicle parking spaces. The Council will be able to use its controls in relation to landscaping to ensure a soft, relatively green and vegetated road frontage; in practice, a significantly more attractive frontage that currently exists for the sawmill and deer factory sites. I would not necessarily expect that industrial activity and buildings would be entirely visually screened by vegetation, but that an attractive and vegetated edge is presented to Church Road. This may possibly involve retaining a number of the large pines within the setback areas and including other dense vegetation (possibly hedges or mixed native shrub planting) below the larger trees.
- 6.6** If development in accordance with the proposed relief proceeds, I consider that the visual experience of a Church Road user will change in that a current gap between the sawmill/deer factory and the industrial site to the north will be partially filled by another instance of industrial use, albeit one that presents a designed and relatively attractive frontage to the road. The outskirts-of-town / urban fringe visual experience will be reinforced somewhat, reducing the degree of rural aesthetics that are currently experienced on this particular stretch of Church Road.
- 6.7** Regarding the above visual effect, it is important to note the current visual characteristics of the site that have been previously described. It presents to Church Road as an area of unkempt mature pines that prevent views into or across the site, followed by an open area of rough unmanaged land that allows some long views across it. QLDC signs identifying the site as a closed landfill are clearly evident.
- 6.8** As set out previously, in relation to landscape character, I have found that the land uses that would result from the proposed relief will not be discordant with the site and its context. Similarly, in relation to visual amenity as experienced from Church Road, I find that a road user's experience of amenity will not be degraded to any significant degree. A logical continuation/intensification of the current visual experience will be evident; that of passing through a brief urban fringe area before transitioning into the broad rural landscape.

- 6.9** Notwithstanding the above, I find that the treatment of the road frontage of the site is important to appropriately retaining visual amenity and I support the proposed relief in this regard; useful zone provisions require setbacks and give important Council controls.

The Clutha River corridor

- 6.10** The public land of the Clutha River corridor can be seen on Appendix 1 of this evidence. In the vicinity of the submission site, the river itself is relatively deeply incised. A significant bank separates the water from the track that runs to the immediate east of the submission site. The track runs between the Red Bridge and Luggate Creek over variable, rolling terrace topography, generally at a lower elevation than the site itself. It continues to The Nook and follows Luggate Creek southwest to the township via Harris Place.
- 6.11** On the opposite side of the river, the hook-shaped peninsula is very largely made up of a parcel of land owned by Contact Energy Ltd. A relatively narrow (and seemingly difficult to access) strip of Crown marginal strip land follows this true left side of the river.
- 6.12** To the north of the submission site, towards the Red Bridge, the public land on which the track sits accommodates some significant stands of remnant kanuka. Heading south, as it passes the Rhodes site, vegetation gives way to unmanaged exotic wildings. Passing the submission site, the track sits on rough, weedy, relatively flat ground, with the site appearing as an area of rough forest. Intermittent views to the river itself are available from this stretch of track.
- 6.13** A user of the stretch of track that adjoins the submission site has recently passed either the sawmill / deer factory area or the industrial activities of the Rhodes site. In any event, a trail user is abundantly aware that they are on the edge or outskirts of a settlement and that industrial or yard-based activities are immediately adjacent to them. The amenity experience is still of a high quality. Many stretches of recreational track in this district pass close to industrial, business or residential areas. A track or trail experience of amenity is, of course, transitory or constantly changing; a track user may pass an area of occupation and busyness and will then soon gain open, unoccupied country. Passing some particular site of activity does not sully or define the amenity experience of the entire trail journey.

- 6.14** I consider that a trail user that is adjacent to the submission site is sensitive to adverse effects on visual amenity. They are involved in a recreational activity that is dependent upon a pleasant setting. I consider that the submission site and whatever activity occupies it is relevant to the current amenity experience but is not necessarily centrally relevant; the visibility of the site is somewhat peripheral to a track user's experience, which is focussed on, and dominated by, the river corridor and the river itself.
- 6.15** I consider that, given the relative elevation of a trail user and the position of the submission site in the composition of views that are experienced, the edge treatment of the site will be of central relevance. Somewhat similarly to the comments above in relation to Church Road, I consider that the Council will be able to use controls at the time of resource consent applications, to ensure a suitable edge treatment. In this instance, such a treatment could appropriately involve a complete screen; perhaps a strip of high mixed native vegetation, incorporating kanuka to tie in with existing patterns, with any security fencing inside the vegetation strip.
- 6.16** I consider that the provisions that are part of the proposed relief give confidence that a result such as the above will be brought about. The visual amenity that is had by a track user will continue to be dominated by the river corridor and the river itself. The frontage of the site to the public land strip will change but not in a way that is particularly adverse; unkempt pine forest being replaced by a vegetated edge and (perhaps) some peripheral visibility of built form. For stretch of recreational track that passes close to an urban area, I do not see that this will constitute a significant adverse effect on visual amenity.
- 6.17** Still within the public land corridor, some elevated locations on the track above the Nook allow some views towards the submission site. The upper parts of the pines of the site can be seen as a horizontal band through the midground of these views. Other built form is visible in the views from these locations. Depending upon specifics of site treatment, upper parts of built development that is enabled by the proposed relief may be visible in these views. I find that distance and the controls that will be reserved over future development will ensure that it is not visually prominent. The views in question are not particularly scenic, nor are they from lookouts or well used viewpoints. From the well-used riverside area of The Nook, the site is invisible. As mentioned, other built development associated with Luggate forms part of these views. Given the urban-fringe context and the controls mentioned above, I consider that the visual amenity of a track user in these locations will be affected to a very low degree.

7 THE EVIDENCE OF MR JONES

7.1 Mr Jones assessed the relief sought as per the submission. He concludes that:

"there is the potential for the site to successfully absorb the development anticipated within the GIZ zone. This is based upon the site's proximity to Luggate, the adjacent land uses, the sites favourable topography and that the site provides a logical extension to the township".³

and that the following factors weigh in favour of the proposed relief:

- (a) *The adjacent established land uses and settlement fringe location which establish a settlement fringe character to the site and reduce the remoteness of the site, associating the activity with Luggate.*
- (b) *The zoning provides a compatible land use for the site and surrounding area.*
- (c) *The proposal will complement the existing adjacent industrial land uses. In order to avoid potential adverse landscape and visual effects as a result of the proposed rezoning, the future design and spatial arrangement of buildings need to be sensitively designed – respecting the sites landscape attributes. This will also seek to avoid potential adverse effects on the amenity of other zones in the surrounding context.*
- (d) *The site forms a logical extension to Luggate adjacent and complementary to existing industrial zones.*
- (e) *The largely level and favourable topography of the site.*

7.2 However, Mr Jones goes on to find that the information contained in the submission itself does not give him sufficient comfort to support the relief sought by the submission. He suggests that more detailed landscape assessment work is required before he can have certainty regarding the appropriateness of the relief. In his paragraph 6.11, he sets out the additional landscape assessment work that he sees as important, being detailed aerial photography and contour

³ Statement of evidence of Mathew Bentley Jones, dated 18 March 2020, paragraph 3.1.

information; commentary of the site's attributes, constraints and opportunities, mapping of specific development opportunities; discussion of the sensitivity of the site; analysis of the site's visibility; and assessment of the effects of the relief on landscape character and visual amenity.

- 7.3** Appendix 2 to this evidence shows contour information for the site and aerial photography. The visibility of the site, and potential development on it is discussed in this evidence, as are the effects of the proposed relief on landscape character and visual amenity. My evidence and the evidence of Mr Jones very largely set out the attributes of the site and its constraints and opportunities, particularly in Mr Jones' paragraphs 6.5 and 6.9.
- 7.4** The area of proposed zoning is relatively small, particularly when we consider the proposed BRA and proposed setbacks. I do not consider that there are realistically any mappable areas of differing landscape sensitivity across the site, other than to say that the parts of the site immediately adjacent to Church Road and the public river-corridor land are the most prominently displayed parts.
- 7.5** In relation to landscape sensitivity generally, this is a function of the context of the subject site, as has been described in this evidence. Although the site is part of the Rural Zone (under the PDP) and the Rural General Zone (under the ODP), it is immediately adjacent to industrial activities and sits on the fringe of a town. In the past, it has been used as a Council landfill for a number of decades. When we consider the rurally-zoned areas of this district, the subject site and its immediate context are at the bottom end of landscape sensitivity in terms of both landscape character and visual amenity. This is not to say that it is of no landscape value or that it does not need to be handled carefully. As has been set out in this evidence, the amenity experience of Church Road users and also users of the riverside public land requires consideration in relation to the Part 2 Chapters of the PDP. However, overall, I consider that the subject site is certainly at the bottom end of landscape sensitivity in relation to the district's rural lands.
- 7.6** It is this low sensitivity and the context of town fringe and other industrial activities that bring the opportunities that the site provides in my opinion. The opportunity is to locate industrial activity so as to provide social and economic wellbeing in a way that integrates into the existing landscape without significantly degrading landscape character or visual amenity. For the reasons set out in this evidence, I consider that the proposed relief will achieve this.

8. CONCLUSIONS

- 8.1** The submission site is zoned Rural Zone by the PDP and Rural General Zone by the ODP but it is unusual in that it sits on the fringe of Luggate Town between two sites that accommodate industrial activity. Additionally, part of the site is a closed landfill and the remainder is covered in dense, mature, unkempt pines.
- 8.2** Due to the site's characteristics and context, I consider that (subject to visual effects being appropriate), the use of the site for industrial land uses will not be at odds with the patterns of existing landscape character; existing landscape character will not be degraded. In this regard, the provisions of the GIZ are relevant; they do not provide for unrestricted development. A pattern of land use commensurate with an urban fringe location and with the neighbouring sites will be enabled.
- 8.3** I consider that the same is true if the Rural Industrial Sub Zone is used in the alternative, provided that the particular provisions that are proposed in relation to setbacks are adopted.
- 8.4** The site is plainly visible from Church Road. It currently contributes relatively little in terms of visual amenity and sits in the context that has been described; adjacent to other industrial land use on the outskirts of Luggate. By use of broad setbacks and control of landscape treatment, I consider that a result will be enabled that is not detrimental to current visual amenity as experienced by a Church Road user. Industrial use of the site, as regulated by the GIZ provisions and visually screened or softened by roadside landscape treatment, will not appear unexpected, incongruous or degrading in this location.
- 8.5** The site is also visually experienced at close quarters from the public track that follows the Clutha River corridor. Again, the site currently appears unkempt and sits between other visible industrial activities. A track user's experience is dominated by the river itself in this location. Again, I consider that the use of setbacks and landscape treatment (ensured by controls) will enable activity on the site that does not significantly degrade the amenity of a trail user compared to the current situation.

8.6 Overall, due to the specific characteristics of the site and its immediate context, I consider that industrial use of the site as proposed can sit comfortably in the landscape. Mr Place has suggested an alternative solution to GIZ, being Rural Industrial Sub Zone. I consider that this zoning (as described in Mr Edgar's evidence) is equally appropriate to GIZ.

ATTACHED APPENDICES

- 1 THE CONTEXT OF THE SUBMISSION SITE
- 2 AERIAL PHOTOGRAPH AND CONTOURS OF THE SUBMISSION SITE.
- 3 THE PROPOSED RELIEF.

Ben Espie

vivian+espie

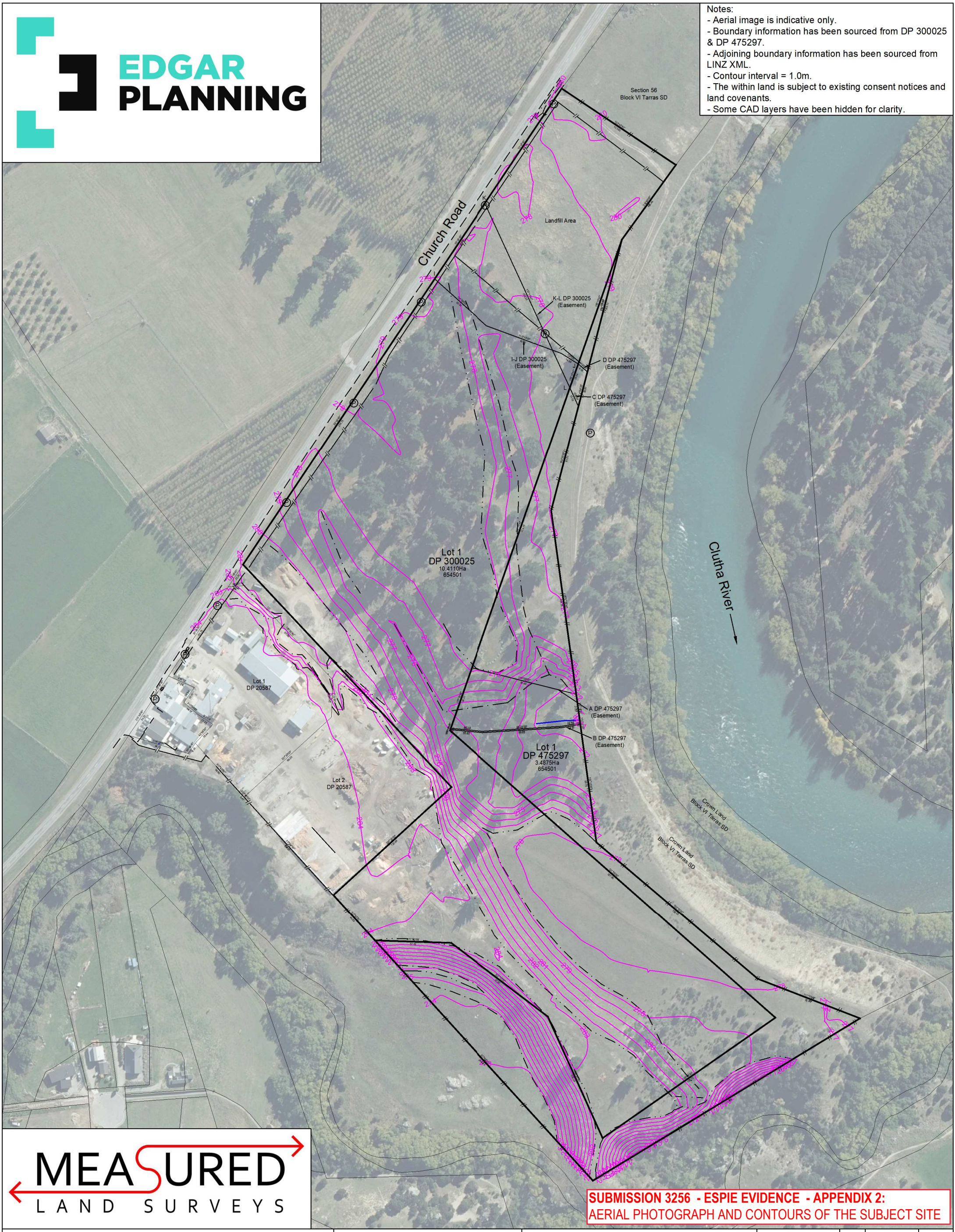
29th May 2020


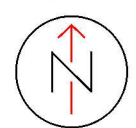


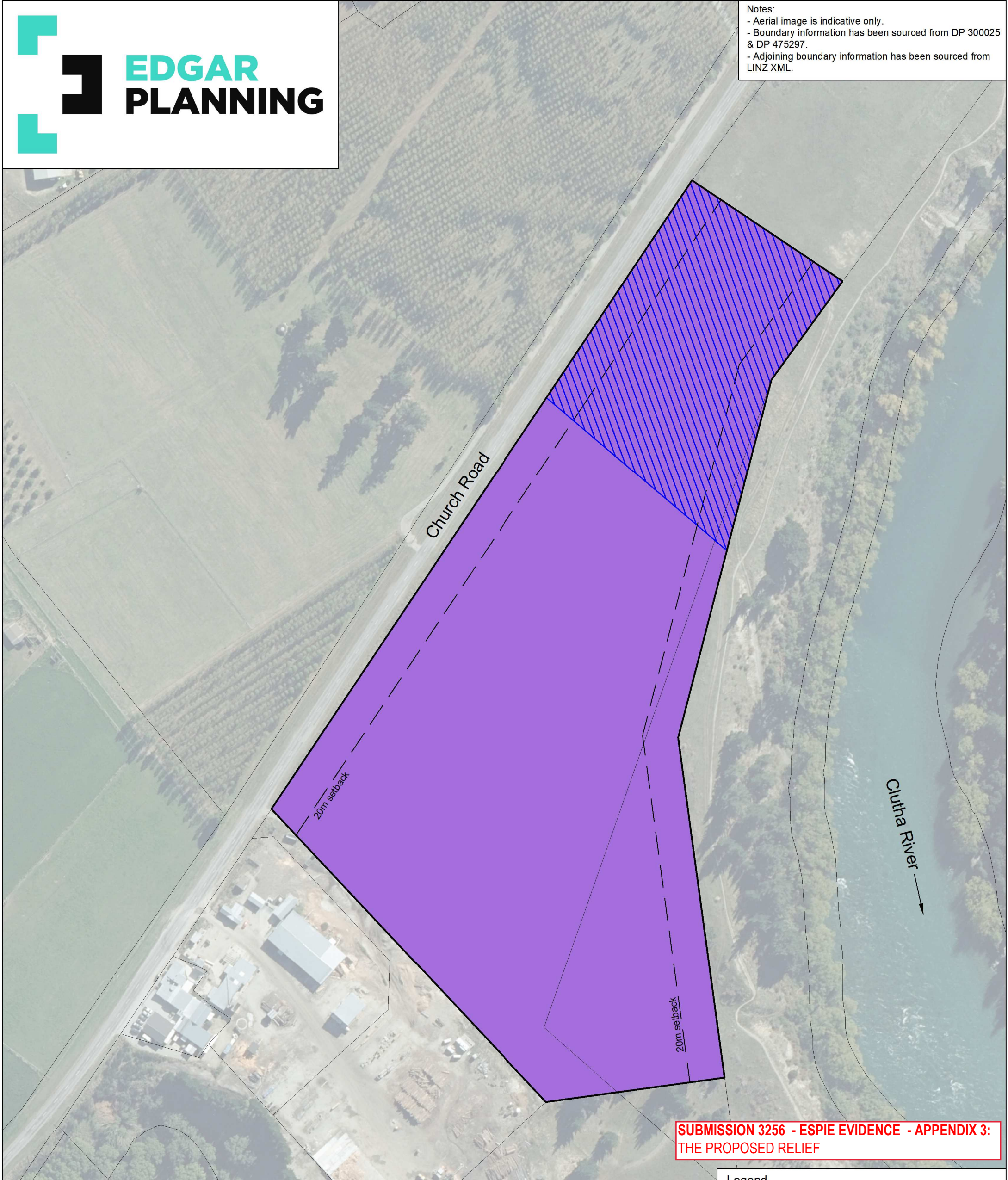
SUBMISSION 3256 – ESPIE EVIDENCE – APPENDIX 1: THE CONTEXT OF THE SUBJECT SITE

The area that is sought to be rezoned is shown overlaid with an aerial photograph and the decisions-version PDP mapping. Relevant features that are discussed in evidence are labelled in black.





Notes:
 - Aerial image is indicative only.
 - Boundary information has been sourced from DP 300025 & DP 475297.
 - Adjoining boundary information has been sourced from LINZ XML.
 - Contour interval = 1.0m.
 - The within land is subject to existing consent notices and land covenants.
 - Some CAD layers have been hidden for clarity.



Upper Clutha Transport - Church Road Topographic Plan	Client:	COPYRIGHT © This drawing and parts thereof are copyright to Measured Land Surveys Limited and shall not be reused, copied or reproduced without the written permission of Measured Land Surveys Limited.  THE CONSULTING SURVEYORS OF NEW ZEALAND A DIVISION OF THE NEW ZEALAND INSTITUTE OF SURVEYORS	 Sheet: 1 of 1	Rev	Description	Date
	Scale: 1 : 2500 @ A3			A	ORIGINAL	27/05/20
	Surveyed: ST 21/09/19			Drawn: ST 27/05/20	Datum: Lindis Peak 2000/DVD 1958	Job #: 19073_T1



SUBMISSION 3256 - ESPIE EVIDENCE - APPENDIX 3: THE PROPOSED RELIEF

Legend	
	Parcel Boundaries
	General Industrial Zone Boundaries (proposed)
	General Industrial Zone (proposed)
	Building Restrictions (proposed)

Proposed General Industrial Zone (Church Road - Luggate)

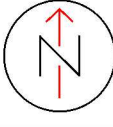
Client:	UCT
Scale:	1 : 2000 @ A3
Surveyed:	Drawn: ST 28/05/20

COPYRIGHT©
 This drawing and parts thereof are copyright to Measured Land Surveys Limited and shall not be reused, copied or reproduced without the written permission of Measured Land Surveys Limited.



A DIVISION OF THE NEW ZEALAND INSTITUTE OF SURVEYORS

Datum: Lindis Peak 2000

 Sheet: 1 of 1	Rev	Description	Date
	A	ORIGINAL	06/11/19
	B	BUILD REST.	28/05/20
Job #:	Rev:		
19073_M2	B		