

16 March 2018

Todd Whittaker
Planning Consultant
Gisborne District Council
PO Box 747
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Dear Todd,

Re: Eastland Port Ltd: Wharves 6 & 7 Redevelopment and Slipway Redevelopment: Resource Consent Applications: Preliminary Response to Submissions

Further to the recent emails and telephone discussions on the above matter. We provide the following comments and further information in relation to the submissions on the two projects.

1. Bayview Apartments and D Ramsay

We note that these submissions are very similarly worded so have considered them together. The following matters have been raised:

- Noise emissions from the proposed construction works and port operations with reference to poorly maintained trucks, engine breaking, the Customhouse St rail crossing and vessel loading and a request to enforce noise limits; and
- Additional traffic movements arising from the project on poor road surfaces, the standard of the Customhouse St rail crossing and a request for upgrading.

A. Traffic Noise Emissions, Effects and Mitigation

Transport noise is addressed in the two September 2017 reports from Malcolm Hunt & Associates. We refer to Section 8.6 of the Wharves 6 and 7 Redevelopment report and Section 9.2 of the Slipway Redevelopment report. We also provided further information on expected construction traffic movements for the two projects in our Section 92 response letters of 28 November 2017 (Ref. Item 4 of both letters).

The Hunt reports find that the noise from construction vehicle movements within the land owned/managed by Eastland Port, will comply with the applicable Tairāwhiti Resource Management Plan (TRMP) rules for both projects. However, as noted in the reports the assessments do not include the noise from vehicles traveling on the adjacent Council roads. This is because such noise is not subject to any TRMP rules. Setting this aside, the Hunt reports finds (on pages 15 and 19 of the respective reports) that such noise “is unlikely to be detected in the context of existing levels of road traffic noise already present in the area.”

The applicants proposed Conditions 33, 42 and 43 will effectively control noise emissions within the port area that arise from construction of the redeveloped wharf and slipway facilities, and then their operation as part of the wider port. In a similar manner proposed Condition 45 covers compliance monitoring in an appropriate manner.

We also note that the Noise Management Plan (NMP) required under proposed Condition 41 requires that noise from log truck movements within the port be managed with respect to surface treatment (clause i), speed (clause ii) and truck maintenance (clauses iii–v). On this basis, we consider the matters raised by the submitters have effectively been dealt with.

B. Traffic Movements, Road and Rail Crossing Conditions

Marty Bayley (of Eastland Port Ltd) has, in the attached letter, provided some further information on the the roads and rail crossing mentioned and their use by port related traffic. As outlined in the letter, and the earlier 4Sight AEE's, the Wharves 6 and 7 and slipway redevelopment projects are not expected to result in significant additional log or other truck movements to and from the port. The redevelopment projects are simply directed at providing more effective and safer vessel manoeuvring/berthing, log and other cargo handling/loading and berthing/refuelling of the port tugs.

The Rakaiaatane Rd and the Esplanade entrance/exits to the port will used during the construction phase, and in the longer term following redevelopment of the wharves. They are of a suitable standard, i.e. they can be used in safe and traffic efficient manner. The standard of the roads themselves, including the rail crossing mentioned, are responsibility of the Council through Tairāwhiti Roads. We do not consider it appropriate for Eastland Port to offer any proposed consent conditions or make any associated undertakings to upgrade public roads, including the rail crossing, because of the two projects under consideration.

2. M Callahan

This submission raises the similar concerns with additional traffic movements and condition of roads serving the port and the Customhouse St rail crossing. Concerns are expressed about the use of Wainui Rd, the Gladstone St bridge, Awanui Rd and Customhouse St, along with the human health risk from logging truck diesel exhaust emissions.

The letter from Marty Bayley also addresses the matters raised. As with the response to the other traffic related submissions, because the construction and operational traffic effects of the projects will be relatively minor no further mitigation measures and/or consent conditions are being proposed.

3. Department of Conservation

This submission focusses on the effects of some of the proposed activities, notably capital dredging on coastal water quality. It requests that conditions be imposed, one requiring 'deployment of a floating silt screen' and the other that 'sedimentation rates be monitored'.

A. Silt Curtain Use

The requested condition regarding use of a silt curtain appears to be made on the understanding that such a facility is expected to be used during land/seabed disturbance phases of the Wharves 6 & 7 and Slipway redevelopment projects. Provision has been made for the use of a silt screen if required.

Section 3.5 (on page 10) of the September 2017 4Sight Ecology and Water Quality Report for the Wharves 6 and 7 redevelopment states (with reference to the proposed capital dredging and the Worley Parsons engineering report) “...that a geotextile boom (silt curtain) can be used around the digging area of the backhoe. This should effectively negate other than minor amounts of turbid water escaping from the works area” (emphasis added). The reports, along with the 4Sight AEE, are not suggesting that use of a silt curtain be mandatory, because there are likely to be port operational difficulties with their use, in terms of safely operating the port tugs and visiting ships in the immediate Wharf 7 area. Also, the water quality effects at the time may not warrant use of a silt screen at all times, because of the turbidity created from tug and vessel movements in the immediate area which will override and mask any relatively minor localised turbidity around the backhoe.

The situation with the Slipway redevelopment is similar. Section 3.1.2 (on page 8) of the September 2017 4Sight Ecology and Water Quality Report for this project finds (with reference to the proposed declamation and the Worley Parsons engineering report) “...that there is an ability to deploy silt curtains if required to contain fines to the immediate marine works areas...” (emphasis added). As noted above the practicalities of having a silt screen in place all the time requires careful consideration from both the port operational and a water quality effects perspectives.

The likely use of a silt curtain to contain sediment discharges during the two projects is covered as part of the proposed Erosion and Sediment Control Plan conditions. Condition 19 of the Wharves 6 & 7 redevelopment set of conditions and Condition 17 of the Slipway redevelopment set of conditions, require a protocol for their use be developed and provided to the Council for certification as part of the plan. We consider these conditions effectively address the matter raised.

B. Monitoring of Seabed Disturbance Activities, Water Colour and Clarity

Eastland Port are not proposing (as part of the Wharf 6/7 redevelopment draft consent conditions) that ‘sedimentation rates’, as such, be monitored during the capital dredging operation. This is because they will be ‘masked’ by much larger sediment generation and turbidity events associated with the regular maintenance dredging operations and vessel berthing/tug boat operations that generate seabed disturbances well in excess of those associated with the Wharf 6 berth pocket capital dredging. Notwithstanding this, proposed Condition 52 sets a performance standard for the capital dredging operations which will keep a check on this aspect. It requires that the capital dredging (for the Wharf 6 berth pocket) and future maintenance dredging (for the Wharf 6 and Wharf 7 area) both be carried out “so that there is no conspicuous change in the colour and visual clarity of the seawater after two hours of the cessation of each dredge run, or when the dredging overlaps with this 2 hour period, within 2 hours after the last completed dredge run.”

Eastland Port will, as part of the construction contract for the Wharf 6 and 7 area, require the dredging contractor to visually monitor the capital dredging operations and log such observations in an appropriate register, to ensure the performance standard is met. It effectively sets ‘bottom line’ to be met all times.

On reviewing this matter, we note that no condition has been put forward regarding the monitoring of the Slipway declamation activities from a water colour and visual clarity perspective. We suggest that the following condition be added to the draft Slipway redevelopment set of conditions, so it is consistent with that for the Wharves 6 and 7 redevelopment project:

38. *The declamation activities shall be carried out so that there is no conspicuous change in the colour and visual clarity of the seawater after two hours of the cessation of declamation activities on any day*

As noted above, we suggest the proposed condition be included as No.38 in the coastal permit.

4. Gisborne Rail Action Group

This submission raises concerns that the projects under consideration, along with others in future, are based on a reliance on road transport, and they should be based on restoring the Gisborne rail line and an associated connection to the port. They are addressed in the letter from Marty Bayley.

As with the other roading related submissions we consider the matters raised fall outside the scope of the subject applications. The Wharves 6 and 7 redevelopment and Slipway redevelopment projects are simply directed at fixing ageing port infrastructure and making better use of the limited available water space. They will not result in a significant increase in logs or other goods/produce passing through the port. Some growth in goods/produce shipment is expected with time, but it will be largely through their increasing availability and shipping trends, which the port company has little control over.

5. Harbourview Apartments Body Corporate

This submission raises concerns about dust and noise emissions from the port. Although the two subject applications are mentioned, the issues appear to be more related to the wider port area. A request is made for dust and noise monitoring equipment to be installed on the submitters apartment site. A request is also made for the construction to be limited to 'normal' work time hours.

A. Control of Dust and Noise Emissions

The control of dust and noise emissions during construction of the two projects is addressed through the respective proposed Construction Management Plans (CMP'S). We refer to proposed Condition 8 in both sets of conditions that require CMP's be submitted to the Council for certification before construction commences.

Condition 28 in the Slipway set and Condition 31 in the Wharves 6 and 7 set, require dust emissions be controlled in accordance with the recognised Ministry for the Environment Guideline (MfE 408). Condition 30 in the Slipway set and Condition 33 in the Wharves 6 and 7 set require noise emissions be controlled in accordance with the recognised NZ Standard (NZS 6803).

On the above basis, we consider that dust and noise emissions from the two projects will be effectively controlled and not adversely affect the apartment owners and occupiers.

B. Dust and Noise Monitoring Equipment

The letter from Marty Bayley and attached memo from Malcolm Hunt outline the respective dust and noise monitoring programmes in place at the port and the refinements/additional measures being proposed as part of the two proposed redevelopment projects.

Malcolm Hunt's memo also responds to the concerns raised about noise emissions from the two redevelopment projects and wider port operations.

C. Construction Hours

Construction hours 'per se' are not expected to be limited for the two projects. However, the proposed conditions on construction noise will (in accordance with NZS 6803) effectively do this. Effectively no 'noisy' construction work will be able to be undertaken at night or on Sundays and public holidays (Ref. Wharf 6/7 Redevelopment Condition 33 & Slipway Redevelopment Condition 30).

6. W Moreton

This submission raises concerns about the public notification process associated with the applications, considering they should be part of a 'plan change for the whole (port) precinct'. It considers that 'noise and vibration impacts have not been addressed in sufficient detail'. The submission also raised some concerns with the most recent resource consents issued for upgrading of the port logyards.

The resource consent applications for redevelopment of Wharves 6 and 7 and slipway are part of a wider Port redevelopment process that began with plans in the early 2000's to upgrade the Southern logyard. The resource consents for this upgrading were issued in December 2010, followed by those for the Upper logyard in December 2013 and the Wharfside logyard in February 2017.

The Upper logyard has been fully redeveloped in accordance with the resource consents and construction work is soon to start in the Wharfside logyard. In each of these consents noise and vibration impacts, have along with dust management, stormwater collection and treatment, landscaping/visual amenities and other environmental effects have been thoroughly assessed by Eastland Port and Council experts.

The noise and vibration effects of the Wharves 6 and 7 and slipway redevelopment projects have been thoroughly assessed in reports from Malcolm Hunt and Associates, as noted earlier in this letter. They (and other effects) are being assessed on a project specific basis because that is how the port is being redeveloped to meet customer demands. The suggested alternative one 'plan change' approach is not really feasible.

This is because some of the projects, such as the planned upgrading of the port breakwater and redevelopment of Wharf 8, are still in the early stages of investigation and will not be ready for consenting for possibly another year or more. On the other hand, the initial southern logyard upgrade investigations were initiated almost 10 years ago and this project was consented over 7 years ago.

Eastland Port Ltd have advised the Council that it willing to work on the plan change for the port area that corrects a few outdated and/or inappropriate rules, such as on noise and vibration. However, most the current Port Management B zone (covering the land) and the Port Management Area (covering the water) are providing an effective environmental ‘bench mark’ for port operations and not in need of any updating or tightening. In this regard, a plan change would be of limited benefit to the port company, and we expect, the neighbouring landowners and occupiers and other parties with interests in the area.

Any plan change also would not, ‘in itself, ‘consent’ the current Wharf 6/7/slipway redevelopment works, as it is most unlikely that the proposed activities all would be permitted activities. So, a longer ‘two-step’ process (plan change, then resource consents) would be involved. Also, under the RMA any new plan change provisions (at least for the land based components) have no legal effect until they have been through the public submission process and Council decisions have been made on them.

7. Ngati Porou Seafoods Group and Others

This submission is made on behalf of the Ngati Porou Seafoods Group, Te Runanga o Ngati Porou, Ngati Oneone, Te Aitanga a Maahaki Iwi Trust and Te Runanga o Turanganui a Kiwa (TROTAK).

The submission raises concerns about the effects of the two redevelopment projects on Te Toka a Taiau (Taiau’s former sacred rock in the Turanganui River) and the associated mauri value of the coastal waters in and around the port. The submission considers that the application package does not adequately assess the effects of the proposals on the former sacred rock and wider mauri values and protect and restore them, in accordance with provisions in the TRMP. The submission also considers that a more detailed cultural assessment based on the ‘Mauri Compass’ approach identified in the TRMP should be undertaken.

The letter from Marty Bayley explains the Eastland Port initiated consultation undertaken to date with the five organisations party to the submission and the associated requests in the submission.

A. Recognition of Te Toka a Taiau

The significance of Te Toka a Taiau to the iwi and whanau organisations is recognised in Section 4.4 (at pages 47-49) of the October 2017 4Sight AEE for the Wharf 6 and 7 redevelopment project. A similar recognition is contained in the Section 4.5 of the October 2017 4Sight AEE for the Slipway redevelopment project. Both reports contain the available public records on the former sacred rock and explains it’s removal by the former Marine Department in the late 1870’s.

The former rock is also recognised in Sections 3.1, 3.4.1 and 4.3 (on pages 5, 10 and 24) of the September 2015 In-Situ Gisborne Port Heritage Inventory and Archaeological Assessment, that was attached to the respective 4Sight AEE's.

Section 3.1 – Voyages and Discoveries, with reference to a 2000 published report (by Oliver) in relation Captain Cook's visit to the area, notes the following:

"The first formal meeting took place on a rock in the middle of the Turanganui River. This rock, Te Taiua a Toka, as a tribal boundary marker and noted mooring place".

Section 3.4 1-Port Development, records with reference to a 2000 published report (by Oliver):

"In 1877, rocks in the river entrance were blasted out, including Te Taiua a Toka".

Section 4.3- Heritage Significance, further records with reference to a 2006 published report (by DoC/Spedding):

"Te Toka a Taiua has links with all iwi of Tairawhiti".

Eastland Port understand that the Council has plans to recognise Te Toka a Taiua and its associated mauri values as part of the Tairawhiti Navigations Project. As outlined in the 4Sight AEE for the Slipway redevelopment project the redeveloped landing is to be made available to the Council for a 'Navigations Project' pedestrian bridge connection or other similar use. Eastland Port are mindful of offering to initiate a proposal to recognise these same or similar cultural values, but is happy to explore them further with the submitter organisations. Eastland Port are also willing to discuss with the submitters, any initiatives that can be undertaken as part of the day to day port operations, provided its function, especially the health and safety of users, is not compromised.

B. Tairawhiti Resource Management Plan Provisions and Assessment Approach

The submission cites the following provisions in TRMP to support the view that a more detailed assessment is required of Te Toka a Taiua and the mauri values of the port area:

- Part B4.7.1;
- Part B6.2.6;
- Part C3.6.3.5; and
- Part F1.4.2 Schedule 19.8e.

Part B4.7.1 is in B4- Coastal Environment of the Regional Policy Statement. It sets out two objectives in respect of coastal water quality, with (b) being *"recognition of the mauri of coastal waters and restoration of degraded coastal waters."* The ensuing policies (8 in total) and methods of implementation (11 in total) do not specifically mention the port. Policy 3, which aims *"to reduce contaminant levels in stormwater discharges"* is the most applicable to the two port redevelopment projects. No long-term discharge of contaminants from the redeveloped slipway is proposed, as outlined in the 4Sight AEE and accompanying expert reports.

The long-term stormwater discharges from the Wharf 6 and Wharf 7 areas are to be treated to nationally recognised standards before discharge into the port waters. In these respects, the two projects have been developed (and consent conditions are being proposed) recognising the mauri values of the coastal waters.

Part B6.2.6- Integrated Management Policies, is in B6- Freshwater, of the Regional Policy Statement. It has eight (8) policies. We are unsure of the relevance of this part of the TRMP to the two port redevelopment projects. None of the policies refer specifically to the port and the protection and enhancement of mauri values. On this basis, we not agree that this part of the TRMP is not being met as suggested in the submission.

Part C3.6.3.5 is one of the fourteen policies in C3 Coastal Management -Tangata Whenua. It reads:

“The Council and consent authorities shall have regard to the need to protect the mauri of coastal resources and, where necessary and appropriate., will encourage the restoration of the mauri of coastal resources.”

The policy is directed at the Council and other consent authorities. It places no particular obligation on Eastland Port Ltd in respect of the Gisborne Port, although as outlined earlier the company are willing to explore with the submitter organisations, any practical initiatives to protect and enhance the mauri values of the coastal waters in and around the port.

Part F1.4.2 Schedule 19.8e

The clause mentioned is part of the plan rule that lists sixteen (16) different requirements for resource consent applications involving discharges under the F1.4- Freshwater Provisions of the TRMP. The provision reads:

“8. An assessment of any actual or potential effects of the discharge on the environment, including:

e. effects on the mauri of the water body.”

We have been unable to find this same provision in F1.2- Coastal Provisions of the TRMP. Following on from this point we note that F1.2.1.4 -Port Management Area, lists ten (10) matters that are to be addressed in resource consent applications to undertake works or erect structure in the coastal marine area (CMA). No specific reference is made to effects on mauri values in this part of the plan.

The resource consent application package lodged with the Council for the Wharf 6 and Wharf 7 redevelopment does not involve any discharge to freshwater. It only involves land use activities and activities in the CMA. The resource consent application package for the Slipway redevelopment does involve a discharge to freshwater, but only for the possible temporary discharge of contaminants to groundwater at the site during the earthworks/declamation process, i.e. while the slipway is being reduced in size and remediated.

No long-term discharge of contaminants to freshwater (or coastal waters) is proposed as part of the slipway redevelopment. As such we consider the assessment of the effects of the possible short-term discharge of contaminants to groundwater (and coastal waters if a 'bundled' approach to the applications is adopted) is really confined to the earthworks/declamation process and associated remediation of the site. As outlined in the 4Sight AEE and accompanying 4Sight Contaminated Site report a draft Contaminated Site Management Plan (CSMP) has been prepared and submitted to the Council as part of the resource consent application package. We, along with Eastland Port, are happy to include in this plan and the associated proposed consent conditions, any practical initiatives that further address the effects of the declamation activities on mauri values.

8. Rongowhakaata Iwi Trust

This submission is accompanied by a detailed report that is in three parts. Section 1 deals with general considerations, including the Rongowhakaata associations with the port area, the Council public notification process, the Port Community Liaison Group and other matters that apply to both projects/application packages. Section 2 focuses on the Wharf 6 and Wharf 7 redevelopment, whilst Section 3 covers the Slipway redevelopment.

A. General Considerations

This part of the submission outlines the Trust's mana whenua and mana moana interests, with reference to the Turanganui River, Puhī Kaiti, Onepoto, Titirangi, Waiohiorore, Waikanāe Stream, Hei Pipi, Te Whai Wehe Rua, and Te Toka a Taiao. A request is made for ongoing engagement with Eastland Port Ltd on the projects and preparation of a Cultural Impact Assessment (CIA).

The letter from Marty Bayley outlines the Eastland Port initiated consultation with the Trust to date and responds to the request for commissioning of a CIA. As outlined in the letter, Eastland Port have consulted the Trust and this will continue during the remaining, consenting and construction phases of the projects. Eastland Port are discussing with the Trust the request to prepare a CIA, along with a similar request in the submission from Ngati Porou/Ngati Oneone/TROTAK and Te Aitangi a Mahaki Trust. Further advice will be provided in due course on the requests.

The letter from Marty Bayley also covers the request in the submission (page 7) for Rongowhakaata to be a member of the current Port Community Liaison Group (PCLG).

B. Effects of the Wharf 6 and Wharf 7 Redevelopment

Section 2.2 of the submission raises some concerns with the characteristics of the materials to be dredged and the volumes to be disposed of at the offshore disposal ground. We consider these matters are appropriately covered in the 4Sight AEE and WorleyParsons engineering and 4Sight ecology reports. Having said this, Eastland Port are willing to discuss this matter further with the Trust, if the specific aspects of the material characteristics and volume that are of concern can be clarified.

Section 2.3 requests closer consideration of the potential cumulative effects of the proposed Wharf 6 /7 dredging operations on the harbour ecology, especially juvenile crayfish. This matter is appropriately addressed in the 4Sight AEE and ecology reports, although we are happy to discuss it further at the planned pre-hearing meeting.

Section 2.4 requests further information on the proposed stormwater discharges, the effectiveness of the proposed treatment devices and requests additional ‘first flush’ monitoring be undertaken. All of these matters are appropriately addressed in the WorleyParsons and 4Sight reports, and at this point no further information is being offered. However, Eastland Port are happy to discuss these matters further at the pre-hearing meeting.

Section 2.5 questions the findings of the 4Sight ecology report in respect of the effects of the proposed redevelopment on juvenile crayfish. It requests that expert science opinion be engaged to assess the matter. We note that a report from Professor Andrew Jeff’s was appended to the 4Sight ecology and used as the basis for the proposed mitigation and monitoring, including the associated proposed consent conditions. We also note that the Council has commissioned Shane Kelly, a consultant ecologist, to review and report on the applications.

Section 2.6 makes a request for the Trust to be appointed to the PLG. This matter is addressed in the attached letter from Marty Bayley.

Section 2.7 questions the noise impacts of the project and requests that they be reviewed. We note that the Council has commissioned Stephen Chiles, an independent acoustic engineer, to assess and report on the applications.

Section 2.8 and 2.9 make no specific requests for further information or changes to the project.

Section 2.10 requests that the proposed ecological monitoring programme, including that for the juvenile crayfish settlement devices, be managed by an independent body and established in consultation with the Trust. Eastland Port are willing to discuss the proposed monitoring programme with the Trust. As required under the proposed consent conditions the Council will have approve the monitoring programme and then review all the reports submitted under it.

Section 2.11 raises very similar issues to Sections 2.4 and 2.5. As noted above expert advice has been provided on the current state of the juvenile crayfish habitat, the effects of the project on it and future monitoring.

C. Effects of the Slipway Redevelopment

Section 3.2 requests clarification of the status of the land containing redeveloped slipway. It will remain as it is (under port management) and simply be made available to the Council should it want to utilise it for informal recreation as part of the Tairawhiti Navigations Project. Sections 3.10 and 3.18 comment on these same matters, along with the esplanade reserve provisions in the RMA. All of the matters are fully explained in Section 4.10 of the 4Sight AEE and at this point no further information or advice can be provided.

Sections 3.3 and 3.4 request further assessment of the effects of the contaminated site remediation works on the port ecology, especially on juvenile crayfish. These matters were comprehensively assessed as part of the 4Sight Contaminated Site and Ecology reports and a set of proposed consent conditions developed to ensure that effective site management and monitoring conditions are in place. At this point no further assessment is proposed by Eastland Port, although Council staff and consultants will be reviewing and reporting on these matters as part of the planned pre-hearing and hearing process.

Section 3.5 comments on the proposed construction and requests the proposed Construction Management Plan – Environmental (CMP-E) is provided before consent is granted, rather than as a condition. No reasons for this request is made, which is not consistent with past consents granted by the Council for the port and other projects.

Section 3.6 comments on the Council’s water classification system, but makes no request.

Sections 3.7 and 3.8 comment on the contaminated site component of the project, which were responded to earlier. We are of the view that robust site management and monitoring systems have been proposed and that ‘the use of the contaminated material (both on site as part of the remediation and offsite at the Tonlyn disposal site) is appropriate’. Section 3.10 comments on the NES provisions, which are addressed in detail in the 4Sight reports submitted with the applications. Sections 3.19 and 3.20 discuss similar matters, which in our view are fully addressed in the reports submitted to the Council.

Sections 3.9 and 3.11 comment on the proposed stormwater management and ecological and water quality monitoring, but make no specific requests.

Section 3.12 comment on cultural and heritage values, and requests a closer working relationship with the Trust. Section 3.13 comments on consultation with iwi. These matters are addressed in Marty Bayley’s letter.

Section 3.17 comments on the public notification process, which is a Council matter.

We trust the above response and the attached letters are sufficient for the planned pre-hearing where they can be discussed further. We look forward to hearing from you.

Max Dunn



Principal Planning and Policy Consultant
4Sight Consulting

Attachments

Eastland Port Ltd letter
Malcolm Hunt & Associates memo



Copies –by email

Marty Bayley (Eastland Port Ltd)
David Aubourg (WorleyParsons)
Mark Poynter & Nigel Mather (4 Sight Consulting)
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