

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN THE WESTERN BAY OF PLENTY DISTRICT**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
WESTERN BAY OF PLENTY**

IN THE MATTER of the Resource Management Act 1991

AND

**IN THE MATTER of the hearing of submissions on proposed Plan
Change 92 to the Operative Western Bay of
Plenty District Plan**

**STATEMENT OF PRIMARY EVIDENCE OF LEZEL BENEKE
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

(CORPORATE)

25 AUGUST 2023

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1. EXECUTIVE SUMMARY

1.1 My name is Lezel Beneke. I hold the position of Principal Development Planner within the Urban Planning and Design Group at Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) and am presenting this evidence on behalf of Kāinga Ora.

1.2 The key points addressed in my evidence are:

(a) A summary of the Kāinga Ora submissions on the Western Bay of Plenty District Council Proposed Plan Change 92 (“**PC92**”), including the rationale for the relief sought and in particular comments about:

(i) Summary of amendments to the Kāinga Ora position;

(ii) Greater heights in Te Puke Town Centre – noting a change in the Kāinga Ora primary submission seeking a High Density Residential Zone in Te Puke;

(iii) High Density Residential Zone in Ōmokoroa;

(iv) The State Highway 2 and Ōmokoroa Road intersection; and

(v) Amending the provisions of the Medium Density Residential Zone.

1.3 Kāinga Ora is mostly supportive of the proposed provisions provided within PC92, but considers that, if the relief requested by Kāinga Ora is adopted, it will further allow Kāinga Ora to adequately increase and improve its public housing provision, but will also provide for significant additional development capacity and aid in the consenting and delivery of housing in the Western Bay of Plenty district (“**District**”).

2. INTRODUCTION

2.1 My name is Lezel Beneke. I hold the position of Principal Development Planner within the Urban Planning and Design Group at Kāinga Ora.

- 2.2 I hold a Bachelor's Degree with honours in Planning from the University of Auckland. I am a full member of the New Zealand Planning Institute. I have held roles in the planning profession for the past 15 years and have been involved in advising on issues regarding the Resource Management Act 1991 ("**RMA**") and District Plans.
- 2.3 My experience includes working within local authorities, private consultancy and as a sole trader. For the past 2 years I have been employed by Kāinga Ora (formerly Housing New Zealand).
- 2.4 I have been providing development planning expertise within Kāinga Ora since 2021. In this role I have:
- (a) Undertaken assessment and identification of redevelopment land within the portfolio;
 - (b) Provided input into the strategic land planning, including the Asset Management Strategy, various investment and land use frameworks, and various structure plan processes of Kāinga Ora;
 - (c) Provided advice on the regulatory planning processes associated with Kāinga Ora residential development projects;
 - (d) Undertaken engagement with local authorities, local communities and other agencies on matters relating to regulatory policy frameworks associated with residential development;
 - (e) Provided advice on, and management of, input into strategic planning activities including plan changes and plan review processes throughout the country, including more recently, technical lead and project management of Kāinga Ora submissions and corporate evidence relating to Plan Changes implementing the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act ("**Amendment Act**") and the National Policy Statement on Urban

Development 2020 (“**NPS-UD**”) across the Waikato, Bay of Plenty, Wellington and South Island regions.

2.5 I confirm that I am authorised to give evidence on behalf of Kāinga Ora in respect of hearings on PC92.

3. BACKGROUND TO KĀINGA ORA

3.1 Kāinga Ora was formed in 2019 as a statutory entity established under the Kāinga Ora – Homes and Communities Act 2019, and brings together Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit.

3.2 The Kāinga Ora - Homes and Communities Act 2019 (“**the Kāinga Ora Act**”) sets out the functions of Kāinga Ora in relation to housing and urban development. Under the Crown Entities Act 2004, Kāinga Ora is a Crown entity and is required to give effect to Government policies.

3.3 The Government Policy Statement on Housing and Urban Development (“**GPS-HUD**”) was published on September 28, 2021, and provides a shared vision and direction across housing and urban development, to guide and inform the actions of all those who contribute to the housing and urban development sector. The GPS-HUD outlines the need for concerted and ongoing action across six focus areas to realise the vision, outcomes, and future envisaged for Aotearoa New Zealand:

- (a) Ensure more affordable homes are built;
- (b) Ensure houses meet needs;
- (c) Enable people into stable, affordable homes;
- (d) Support whanau to have safe, healthy affordable homes with secure tenure;
- (e) Re-establish housing’s primary role as a home rather than a financial asset; and
- (f) Plan and invest in our places.

- 3.4 Kāinga Ora is the Government's delivery agency for housing and urban development. Kāinga Ora therefore works across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
- (a) being a world class public housing landlord; and
 - (b) leading and coordinating urban development projects.
- 3.5 The statutory objective¹ of Kāinga Ora requires it to contribute to sustainable, inclusive, and thriving communities through the promotion of a high quality urban form that:
- (a) provides people with good quality, affordable housing choices that meet diverse needs;
 - (b) supports good access to jobs, amenities and services; and
 - (c) otherwise sustains or enhances the overall economic, social, environmental and cultural well-being of current and future generations.
- 3.6 The statutory functions of Kāinga Ora in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first home buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.
- 3.7 In the capacity as an Urban Development Agency, the approach Kāinga Ora has taken across the IPI plan changes among Tier 1 authorities has been to ensure the intentions of the Amendment Act and the NPS-UD are incorporated within district plans appropriately and that ultimately permissive and/or enabling provisions are introduced through these plan changes to facilitate the creation of well-designed and well-functioning urban environments.

¹ Section 12, Kāinga Ora Homes and Communities Act 2019

4. OVERVIEW OF THE KĀINGA ORA PROPERTY PORTFOLIO

4.1 Kāinga Ora is currently the largest residential landlord in New Zealand, providing public housing² to more than 186,000 people³ who face barriers (for a number of reasons) to housing in the wider rental and housing market.

4.2 To this end:

- (a) Kāinga Ora owns or manages more than 70,000⁴ properties throughout New Zealand, including about 3,700 properties for community groups that provide housing services.⁵
- (b) Kāinga Ora has public housing in locations spread throughout the Western Bay of Plenty district; managing a portfolio of approximately 13⁶ properties across the district and currently consists of 61% three bedroom properties, with 8% consisting of 1 bedroom properties⁷.
- (c) Kāinga Ora has approximately 24,717⁸ applicants (based on household) for the public housing waitlist across Aotearoa, with 192 applications⁹ of this list seeking a home within Western Bay of Plenty¹⁰. (So, to meet the current waitlist in the District, Kāinga Ora needs increase its housing portfolio from 13 to 192, a more than 10-fold increase.)

4.3 To meet this need, Kāinga Ora is undertaking one of the largest housing delivery programmes, with an additional 2,973 new public homes (including 946 leased to community housing providers) being added to the Kāinga Ora housing portfolio between October 2019 and October 2022¹¹ and a continued demand to create more homes.

² Public housing is an umbrella term for state housing and community housing.

³ Kāinga Ora – Homes and Communities Annual Report 2022

⁴ Managed stock as at 31 March 2023.

<https://kaingaora.govt.nz/assets/Publications/Managed-stock/Managed-Stock-National-Summary-March-2023.pdf>

⁵ *ibid*

⁶ *ibid*

⁷ *ibid*

⁸ Ministry of Social Development, Housing Register as at June, 2023

⁹ Application being for one household/whanau

¹⁰ *ibid*

¹¹ Ministry of Housing and Urban Development, Government Housing Dashboard <https://www.hud.govt.nz/stats-and-insights/the-government-housing-dashboard/change-in-public-homes/#tabset>

- 4.4 Public housing is a subset of affordable housing, and meets the housing needs of people who face barriers to housing in the wider rental and housing market. In general terms housing supply issues and broader events such as the Covid-19 global pandemic and financial market issues have made housing less affordable and as such there is an increased demand for public housing.
- 4.5 This is particularly so in the Western Bay of Plenty District, which has seen a marked increase by percentage in the Housing Register compared to September 2019 (121% increase or 105 applicants).¹² Further, there has also been a significant increase within the Tauranga district of 220% or 342 applicants.¹³ In response to this increased demand for housing, Kāinga Ora need to build at pace and scale to provide residents permanent dry and warm homes within the Bay of Plenty region as a whole.
- 4.6 There has been a marked change in the type of public housing that is required by the Kāinga Ora tenant base:
- (a) Demand has increased for single bedroom housing required for single persons, the elderly or disabled, and larger homes with four to six bedrooms required to house larger families.
 - (b) As a result, the size of many State houses does not match the changing demand for public housing, with a large proportion of the Kāinga Ora housing stock comprising older 2-3 bedroom homes on large lots which are too large for smaller households and too small for larger households.
 - (c) This has meant that Kāinga Ora has had to review its housing portfolio and assess how it can respond to the changes in demand, given its current housing supply is skewed towards 2–3-bedroom houses that do not meet the needs of tenants and/or are uneconomic to maintain.

¹² Ministry of Social Development, Housing Register as at June 2023

¹³ *ibid*

- (d) In the Western Bay of Plenty District, the demand for 1 and 2 bedroom homes makes up 82% of the waitlist demand.¹⁴ Similarly, 80% of applications on the waitlist within the Tauranga district are also awaiting 1 or 2 bedroom homes.

5. THE KĀINGA ORA SUBMISSIONS

- 5.1 Kāinga Ora has lodged comprehensive submissions on PC92. These submissions arise from the operational and development needs of Kāinga Ora, but also reflect a wider interest in delivering the strategic vision and outcomes sought through the Amendment Act and the NPS-UD. The intent of the submissions is to ensure the delivery of a planning framework in Western Bay of Plenty that contributes to well-functioning urban environments that are sustainable, inclusive and contributes towards thriving communities that provide people with good quality, affordable housing choices and support access to jobs, amenities and services.
- 5.2 Nationally, one of the strategic goals of Kāinga Ora through the various IPI processes has been to ensure that local authorities implement the NPS-UD to the fullest extent. There is a high demand for housing in Aotearoa, and to supply a greater number of homes in locations that connect well to jobs, education, transport and amenities. There is, therefore, a strong need to build up, rather than out. Intensification, when done well, can bring a range of benefits to an area, such as greater opportunity for investment in infrastructure and local amenities, increased safety and a stronger sense of community and more public green spaces when this is provided as part of comprehensive redevelopments.
- 5.3 As New Zealand's Urban Development Agency tasked with creating more homes across New Zealand at pace, Kāinga Ora supports plans that enable more people to live in locations that have good access to jobs, amenities and services that meet their day to day needs, and that enable enough housing supply so that current pressures are eased.

¹⁴ Ministry of Social Development, Housing Register as at March 2023

5.4 The creation of provisions within District Plans to enable development in accordance with the NPS-UD will contribute towards a planning system that facilitates the delivery of a variety of homes with a focus on connectivity and functionality within the urban environment. It is acknowledged that PC92 as notified has the potential to reduce regulatory constraints and increase housing supply as required through both the Amendment Act and the NPS-UD. However, the following key themes of the PC92, as notified, compromise the extent to which the planning provisions enable appropriate development across the Western Bay of Plenty:

- (i) Greater heights in Te Puke Town Centre – noting a change in the Kāinga Ora primary submission seeking a High Density Residential Zone in Te Puke;
- (ii) High Density Residential Zone in Ōmokoroa;
- (iii) The State Highway 2 and Ōmokoroa Road intersection; and
- (iv) Amending the provisions of the Medium Density Residential Zone (“**MRZ**”).

5.5 If the Kāinga Ora submission on PC92 is adopted, particularly in relation to the above, then the constraints inherent in PC92 in its notified form would be reduced, and the plan change would enable greater development capacity for additional public and affordable dwellings on in the District.

6. FURTHER WORK FOLLOWING THE LODGEMENT OF THE KĀINGA ORA SUBMISSION

6.1 Since lodging the primary submission, Kāinga Ora has undertaken further locally-specific assessment in Western Bay of Plenty. This has resulted in the following changes to the relief sought by Kāinga Ora.

- (a) As noted above, a High Density Residential Zone (“**HRZ**”) in Te Puke is no longer being pursued through PC92. Upon further work undertaken, Kāinga Ora considers that a focus should be given to enabling more intensive development within

the town centre of Te Puke through enablement of greater heights. Kāinga Ora therefore seeks an increase in the height limit to 24.50m as opposed to the currently operative 12.5m height limit.

- (b) Further submission points that are no longer being pursued are comprehensively covered in the planning evidence of Ms Tait and summarised in paragraph 6.3 of her evidence.¹⁵

7. APPLICATION OF THE NPS-UD – ZONING PATTERNS

7.1 Kāinga Ora has an inherent interest in urban development outcomes in Aotearoa. Kāinga Ora also has as an objective achieving broad consistency to intensification outcomes across Tier 1 councils, and more specifically, achieving a higher degree of regional consistency in Plans across the wider Bay of Plenty region.

7.2 It is considered that a blanket ‘do minimum’ approach to building heights and extents of walkable catchments within PC92 does not appropriately respond to local context or demand for housing and is not commensurate with the level of commercial activity and community services. Kāinga Ora considers that PC92:

- (a) does not enable intensification in the district to its full potential, by limiting increased heights within Te Puke to the Medium Density Residential Standards (MDRS) only;
- (b) fails to provide for higher density residential living to acknowledge the appropriateness of more intensive residential development adjoining and within the Ōmokoroa and Te Puke town centre;
- (c) through the absence of revisions to the centre zoning of Te Puke. PC92 does not recognise the important relationship between land, development and the proximity to the services and amenities of the Te Puke town centre.

¹⁵ Statement of Primary Evidence of Susannah Vrena Tait on behalf on behalf of Kāinga Ora – Homes and Communities

8. INCREASED HEIGHTS IN THE TE PUKE TOWN CENTRE

8.1 Te Puke is a Tier 1 urban environment and is recognised as an important centre within the Bay of Plenty Region, and notably, currently the largest centre in the District. Whilst the commercial centre would currently be classified as a town centre, Te Puke is expected to grow over the next 30 years. SmartGrowth has projected a housing shortfall in Te Puke and further, growth in Te Puke has been signalled in the Regional Policy Statement, to ensure that there is sufficient capacity to meet demand¹⁶.

8.2 The evidence of Mr Osborne¹⁷ in support of increased heights within the Te Puke Town Centre also notes:

The Te Puke Town Centre represents the most significant commercial area within the District. This is aided by the extensive industrial and agricultural activities that lie to the west, thereby making Te Puke the largest centre of employment activities within the District. As such the facilitation of high-density residential development, at a level that would be achieved through the height limits proposed by Kāinga Ora, would not be at odds with the centre as a whole and would instead be commensurate with both the current and future levels of development, consistent with Policy 3(d) of the NPS-UD.

8.3 Kāinga Ora has therefore sought increased height in the town centre of Te Puke to support design flexibility, planned urban built form, development density and provide height/daylight expectations commensurate to the centre zoning, particularly in light of the application of the NPS-UD and the Amendment Act. The purpose of this is to not only enable the development of homes within proximity to jobs, education, transport and amenities, but to also encourage a modal shift from private vehicle use to active transport and public transport.

¹⁶ Smart Growth, Housing and Business Capacity Assessment 2022, https://assets.website-files.com/639c0b75c31ac6442f8d9994/64349bc2c1665396cc2ea5a4_SmartGrowth%20HBA%20summary%202022%20Final%20v1%20web.pdf

¹⁷ Statement of Evidence of Philip Mark Osborne, on behalf of Kāinga Ora

- 8.4 PC92 does not include any modification of the existing commercial centre provisions. It is the view of Kāinga Ora that there is a need to enable development in Te Puke that is at a greater scale than that enabled and prescribed in the Operative District Plan (“**District Plan**”).
- 8.5 Such a focus on the intensification of existing and strategic centres plays a significant role in the future development of the Region, with increased heights providing the opportunity to facilitate urban growth that contributes to the vitality of centres that would in turn see an increase in economic activity and outcomes. If more height is not enabled in this location, there is a risk that land will be underutilised and underdeveloped, and that there will be an inevitable continuation of a focus on Greenfield development across Te Puke rather than a concentrated focus of Brownfield redevelopment in and around the town centre.
- 8.6 With respect to the height limit of 24.5m that is now being sought in the centre of Te Puke, Kāinga Ora notes that this is important to incentivise higher density residential development into the centre of Te Puke, in accordance with the NPS-UD. As noted through the evidence of Mr Osborne:

Without the increase in height, the Te Puke Town Centre would essentially have the same enablement as the residential zone which is contrary to the objectives and purpose of the NPS-UD. From an economic viewpoint, this represents an inefficient outcome, with residential density effectively being encouraged to locate outside of the District's largest commercial centre, rather than in it.

- 8.7 Mr Osborne goes further to state:

I would expect that the realisation of apartment capacity in the Te Puke Centre would be significantly lower under a 12.5m height limit than the 24.5m height limit proposed by Kāinga Ora¹⁸.

¹⁸ Evidence of Mr Phillip Osborne, 25 August 2023

9. HIGH DENSITY RESIDENTIAL IN ŌMOKOROA

- 9.1 Kāinga Ora seeks that the intended outcomes sought by the NPS-UD and the Amendment Act are clearly articulated in PC92 through the use of appropriate zones and provisions.
- 9.2 Kāinga Ora seeks to rezone the Ōmokoroa Stage 3C area to a new 'High Density Residential Zone' ("**HRZ**") instead of forming part of Section 14A. The intention of the submission was to emphasise the different outcomes sought between the MRZ and the HRZ, and to encourage a greater degree of intensity of built form and density than anticipated in the notified objectives. Kāinga Ora seeks that the District Plan identifies where MDR and HRZ is enabled and that this is clear to all users – both looking at the District Plan maps as well as reading the appropriate zone chapter provisions – that draws the user to the specific zone and outcomes, not hidden under a layer of zones, overlays, rules and map layers that are difficult to navigate and interpret.
- 9.3 Consistent with National Planning Standards and neighbouring District Plans, Kāinga Ora seeks for the introduction of a HRZ, in place of the Ōmokoroa Medium Residential Zone – Area Specific Overlays. The HRZ will provide the clarity and certainty to plan users on what is high density residential and where high density residential development is enabled and provided for in the region.
- 9.4 I therefore consider that the amendments sought in evidence by Ms Tait on the introduction of the HRZ and amendments to the General Residential Zone to PC92 will provide the clarity and certainty to all plan users, of where greater opportunities of residential development and intensification will occur in the region.

10. STATE HIGHWAY 2 AND ŌMOKOROA ROAD INTERSECTION

- 10.1 In order to protect the State Highway 2 (SH2) and Ōmokoroa Road Intersection, Waka Kotahi have requested a non-complying activity status to subdivision/development within the Stage 3 structure plan area for the following stages:

- (a) Once the capacity of the interim roundabout has been reached and;
 - (b) Prior to a future grade-separated interchange becoming operational.
- 10.2 The evidence of Mr Clow states that “Ōmokoroa is anticipated to grow to a maximum of 13,000 people in the next 30 years. The current population is estimated at 5,427. The Ōmokoroa Stage 3 area “is expected to provide for a further 2580 residential units or approximately 6,708 people”¹⁹.
- 10.3 Kāinga Ora is concerned about the Waka Kotahi approach to consent triggers and the intention of a non-complying activity status for subdivision consents. This activity status would indicate that the activity is not anticipated through the District Plan, when in fact growth in Ōmokoroa’s Stage 3 structure plan growth area is anticipated through the Amendment Act and is necessary to meet the housing needs of the district.
- 10.4 Kāinga Ora therefore opposes the relief sought by Waka Kotahi and requests that a more appropriate restricted discretionary activity status is introduced. I therefore consider that the amendments sought in evidence by Ms Tait on the introduction of new provisions, included a restricted discretionary rule framework to be appropriate²⁰. These provisions will support residential growth, while also ensuring the State highway network is safe and efficient.
- 11. AMENDING THE PROVISIONS OF THE MEDIUM DENSITY RESIDENTIAL ZONE (MRZ)**
- 11.1 Ms Tait’s evidence provides a comprehensive assessment of the numerous changes sought in regard to the Chapter 14A MRZ provisions and are not repeated here. I support these changes, but

¹⁹ Mr Tony Clow, WBOPDC PC92 s42A Officer’s Report, 2023

²⁰ Statement of Primary Evidence of Susannah Vrena Tait on behalf on behalf of Kāinga Ora – Homes and Communities

would specifically speak to two of the points from a Kāinga Ora operational capacity being:

- (a) Density restrictions within Chapter 14A; and
- (b) Reference to the 'Residential Outcomes Framework' within the Te Puke and Ōmokoroa MRZ matters of discretion.

Density

- 11.2 Kāinga Ora opposed Rule 14A.4.2(a) – Yield²¹ as the proposed density minimums²² were not consistent with a medium density outcome. Whilst Kāinga Ora would prefer the deletion of this rule, Kāinga Ora considers that a density standard of 35 residential units per hectare of developable area is appropriate and will better provide for the intended medium density outcomes sought by PC92.
- 11.3 Kāinga Ora undertakes greenfield developments across Aotearoa. Whilst density outcomes range across regions, a typical medium density residential outcome is provided at 35 dwellings per hectare. This is evident in areas within Hobsonville Point in Auckland and currently being designed for within a range of Kāinga Ora developments within Tauranga.
- 11.4 Further, as proposed by the introduction of a new HRZ for Ōmokoroa by Kāinga Ora, a minimum density of 50 dwellings per hectare is also considered appropriate to achieve true high density outcomes that allows for higher density apartments or similar.
- 11.5 Kāinga Ora is concerned that the lower density thresholds within Rule 14A.4.2(a) will allow for single household units on larger lots that are typical within Ōmokoroa and Te Puke currently, which will continue to contribute to the shortfall of homes within the Western Bay of Plenty district.²³

²¹ Submission 29.42

²² Notified densities of 15, 20 and 30 lots/units per hectare

²³ As outlined within the SmartGrowth Housing and Business Capacity Assessment, 2022

Design Guidelines

- 11.6 In relation to the 'Residential Design Outcomes' within the Te Puke and Ōmokoroa MRZ matters of discretion, Kāinga Ora takes a consistent position on the use and role of design guides (or in this instance – Residential Design Outcomes) within the development process.
- 11.7 Kāinga Ora seeks that the Design Guides generally sit outside of the District Plan as a non-statutory document. Kāinga Ora considers that the Design Guides should assist the plan user as a guide to inform the design process for proposals and be used as a tool to assist applicants to understand how to achieve the planned outcomes of the relevant objectives, policies and assessment criteria of the plan. The planned outcomes should be clearly described and identified in objectives, policies, rules and relevant matters of discretion for activities and rules.
- 11.8 Overall, the guide is simply that, a guide, and directly including it in the assessment criteria elevates the guide to a de facto rule or standard in its own right.
- 11.9 If there are critical outcomes that the Design Guides are trying to achieve, Kāinga Ora considers these matters should be referred to in the relevant assessment criteria and/or matters of discretion and effects standards/rules in the District Plan. Design Guidelines are more appropriate as a non-statutory planning and advisory tool that can assist the plan-user in interpreting and complying with the District Plan provisions. More importantly, any such guidelines can be updated and amended accordingly to best practice without having to go through a RMA Schedule 1 process.
- 11.10 Moreover, direct reference to a specific set of Design Guidelines causes consenting ambiguities for Kāinga Ora in particular. Kāinga Ora adhere to an internal set of guidelines²⁴ to enable Kāinga Ora to meet our responsibilities set out in the Urban Development Act, and ensure that through good design, Kāinga Ora are ensuring our customers can live

²⁴ Tāone Ora: Urban Design Guidelines and Toitū Te Whenua Toitū Te Kāinga: Landscape Design Guide For Public Housing

well within their homes and communities with dignity, stability and as much independence as possible.

A handwritten signature in black ink, appearing to read "Beneke". The signature is fluid and cursive, with a prominent initial letter.

Lezel Beneke

25 August 2023