

Planning Report

Plan Change 53 – Protection Lots for Esplanades

1.0 Introduction

- 1.1** The purpose of this report is to provide recommendations on submissions and further submissions to Plan Change 53 – Protection Lots for Esplanades.
- 1.2** Plan Change 53 proposes allowing a specific group of landowners the ability to subdivide using on-site protection lots gained by providing land to Council for esplanade reserves or strips. The Plan Change targets proposed esplanade reserves and strips (already identified in the District Plan) from six specific waterways and involves 36 individual lots. The reason for the Plan Change is because proposed esplanade reserves and strips are generally obtained through subdivision only however the opportunity to subdivide in the Rural Zone is now limited because of more restrictive subdivision rules introduced under the District Plan Review.
- 1.3** For a full background to the Plan Change and the proposed provisions please refer to the Section 32 Report. For a list of the proposed provisions only, please refer to the document titled 'Summary of Recommendations – All Section 32 Reports'.
- 1.4** Any recommended amendments to rules in this report will be shown as follows; existing District Plan text in black, proposed changes as included in the Section 32 Report in red, and recommendations as a result of this Planning Report in blue.

2.0 Topic 1: Targeting of specific waterways

2.1 Background

The Plan Change targets proposed esplanade reserves and strips along six specific waterways being the Uretara Stream, Ohuorere Stream, Wairoa River, Waimapu Stream and the Tauranga Harbour. These waterways were selected based on their value to the community and because there is a reasonable chance of completing the esplanade network along these waterways. These are proposed to be listed in a new Appendix 4A of the District Plan.

2.2 Submission Points

- 2.2.1** Bay of Plenty Regional Council supports the targeting of specific waterways for esplanade acquisition.
- 2.2.2** D155 Limited opposes the use of protection lots being restricted to just those features identified in the District Plan.

2.2.3 Poripori Farm A Trust opposes the inclusion of the Poripori Farm A Block along the Wairoa River for the following reasons;

- The block is Maori freehold land
- The block is subject to alienation restrictions under the Te Ture Whenua Maori Act 1993
- Any protection of riparian margins will be at the sole discretion of the Trust and by way of a Maori reservation under the Te Ture Whenua Maori Act 1993 with access solely for the owners and their descendants
- The Trust opposes any public access to the block.

2.2.4 Gideons Valley Trust's original submission opposes the taking of esplanade on their property along the Waimapu Stream. In their further submission they state are not interested and the land is impractical for public access or use.

2.2.5 Bay of Plenty Regional Council's further submission opposes the original submission of Gideons Valley Trust. They say the approach provides a transparent means for identifying where future reserves are a priority for acquisition and that landowners subdividing will be better informed where esplanade reserves will be sought by Council.

2.3 Discussion

2.3.1 The options of targeting all waterways and targeting specific waterways were discussed in the Section 32 Report. Targeting specific waterways was selected because it is likely to result in most of the esplanades on the targeted waterways being obtained. This is opposed to targeting all waterways which may result in few esplanade networks ever being established. Targeting all waterways would also result in a large number of protection lots being created which runs counter to the rural subdivision strategy.

2.3.2 Other proposed esplanades can still be considered for protection lot subdivision as a non-complying activity.

2.3.3 In terms of the submissions from Poripori Farm A Trust and Gideons Valley Trust, the proposed esplanade reserves and strips on these properties are already identified in the District Plan (Appendix 4 and Maps). This Plan Change now identifies them as a priority for acquisition and gives incentives through the protection lot rules to provide this land to Council. It is the landowners' choice whether they chose to take advantage of this incentive or not. There is no scope to remove the proposed esplanade reserves and strips from the District Plan as they were not introduced through this Plan Change.

2.4 Recommendation

That Appendix 4A (targeting six specific waterways) is retained as notified.

The following submissions are therefore:

Accepted

Submission	Point Number	Name
8	6	Bay of Plenty Regional Council

Accepted in part

Submission	Point Number	Name
22	7	D155 Limited

Rejected

Submission	Point Number	Name
15	1	Poripori Farm A Trust
6	1	Gideons Valley Trust
FS83	2	Gideons Valley Trust

2.5 Reasons

2.5.1 Targeting specific waterways was selected because it is likely to result in most of the esplanades on the targeted waterways being obtained. This is opposed to targeting all waterways which may result in few esplanade networks ever being established. Targeting all waterways would also result in a large number protection lots being created which runs counter to the rural subdivision strategy. Other proposed esplanades can still be considered for protection lot subdivision as a non-complying activity.

2.5.2 There is no scope to remove proposed esplanade reserves and strips from the properties of Poripori Farm A Trust and Gideons Valley Trust. These already exist in the District Plan and were not introduced through this Plan Change.

3.0 Topic 2: Standards allowing landowners to combine proposed esplanades to meet the minimum feature size of 500m

3.1 Background

The proposed standards allow one protection lot for the first 500m of esplanade given to Council. Subsequent protection lots are allowed based on an average of 1km (for example 2km total is needed for a second protection lot and 3km is needed for a third). Only 14 out of the 36 properties identified in Appendix 4A have at least 500m individually. The other 22 properties must combine with others to achieve the minimum length of 500m with any new lot only benefitting one property.

As it stands, the following protection lots can potentially be generated under this approach;

Category	Frequency	Protection Lots
Properties with more than 4km	1	4
Properties with between 500m and 2km	13	13
Properties with less than 500m 5600m total length / 500m = 11 (approx)	22	11
Total	36	28

3.2 Submission Points

3.2.1 D155 Limited's submission seeks more enabling provisions. They have since clarified to staff that the requirement for landowners to combine with others to meet the minimum size of 500m needs to be reviewed as it is costly and unworkable and will discourage landowners from taking up the incentive.

3.3 Option 1 – As proposed – landowners with properties with less than 500m of proposed esplanade reserve or strip can combine with other landowners to meet the minimum size of 500m

Benefits	<ul style="list-style-type: none"> ▪ All landowners have the opportunity to financially benefit using the protection lot rule. ▪ If all landowners participate, this will result in 28 new protection lots than can be used on-site in the Rural Zone. This is 11 less than under Option 2. ▪ Requiring at least 500m for the first protection lot (regardless of whether it is an individual property or combined properties) is a fairer and more equitable between landowners in terms of what is gained in return for the provision of land to Council. ▪ 500m is also consistent with what other landowners must provide for other features (such as riparian margins and access to reserves) in order to gain one protection lot.
Costs	<ul style="list-style-type: none"> ▪ Landowners are faced with high surveying costs and the problem of having to agree with other landowners over how to approach the subdivision. For instance, they must decide who to combine with. Then decide which property will benefit from the on-site protection lot or whether to transfer the protection lot to the Lifestyle Zone. They also need to agree on how to share costs and profits. This may discourage many landowners from participating. ▪ It is also possible that landowners could combine in a manner which makes it difficult for other landowners to participate. For example if landowners A and B combine and landowners D and E combine they may leave landowner C with a piece of land in between and

	<p>no opportunity to combine with others.</p> <ul style="list-style-type: none"> Because of the above, the esplanade linkages being sought by Council might not be achieved, defeating the purpose of the Plan Change.
Effectiveness/ Efficiency	<ul style="list-style-type: none"> Not as effective as Option 2 as it may result in the esplanade linkages not being achieved. Not as efficient as Option 2 as landowners are faced with logistical problems of having to combine with other landowners.
Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter	<ul style="list-style-type: none"> N/A – sufficient information is available.

3.4 Option 2 – All landowners gain a protection lot in exchange for the proposed esplanade reserve or strip on their property

Benefits	<ul style="list-style-type: none"> All landowners have the opportunity to financially benefit using the protection lot rule. This approach is more likely to encourage landowners to participate. This approach is more likely to achieve the purpose of the Plan Change to establish esplanade linkages.
Costs	<ul style="list-style-type: none"> If all landowners participate, this will result in 39 new protection lots than can be used on-site in the Rural Zone (this includes the one property entitled to 4 lots). This is 11 more than under Option 1. Not as fair and equitable between landowners in terms of what is gained in return for the provision of land to Council. Landowners of larger properties may therefore argue for a larger number of protection lots. However, these landowners currently do not have the opportunity to subdivide and will benefit regardless of how much they benefit compared with others. Some properties have a very small length of esplanade that could be provided to Council i.e. 10m and 74m and perhaps should not receive a protection lot. Inconsistent with what other landowners must provide for other features (such as riparian margins and access to reserves) in order to gain one protection lot. May also set an unrealistic expectation with respect to the identification of future “priority” esplanades. It is not sustainable in terms of the rural subdivision strategy to allow a protection for all proposed esplanades in the Rural Zone.
Effectiveness/ Efficiency	<ul style="list-style-type: none"> Likely to be more effective than Option 1 in terms of achieving the intent of the Plan Change. However, less effective at reducing the number of new lots being created in the Rural Zone. Will be more efficient than Option 1 as it removes the

	logistical problems associated with landowners having to combine.
Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter	<ul style="list-style-type: none"> ▪ N/A – sufficient information is available.

3.5 Discussion

3.5.1 Option 1 ensures a greater level of fairness between landowners in terms of how much land needs to be provided in order to gain a protection lot, and would result in less on-site protection lots to be used in the Rural Zone, however it is unlikely that many landowners will look to combine with other landowners to achieve the minimum feature size of 500m. Hence, the purpose of the Plan Change appears unlikely to be achieved.

3.5.2 Option 2 allows slightly more on-site protection lots to be used in the Rural Zone and rewards some landowners much less than others in terms of how much land they need provide before receiving a protection lot, however is more likely to achieve the purpose of the Plan Change. Therefore, on balance, Option 2 is recommended as the best way forward.

3.5.3 The properties with the 10m and 74m lengths of proposed esplanade should not receive a protection lot and some other measure could be considered to obtain them. The property with the 10m proposed esplanade is actually a private way and would not be eligible for an additional lot anyway. The property with the 74m proposed esplanade is only 3158m² and the location of the existing dwelling is likely to prevent the opportunity to utilize an additional lot. Alternative access can be created by crossing the stream.

3.5.4 Deleting these two features from Appendix 4A will result in 37 rather than 39 new protection lots than can be used on-site in the Rural Zone.

3.6 Recommendation

That proposed rule 18.4.2 (h) (vii) be amended as follows;

(vii) Standards for the creation of on-site Protection Lots or Transferable Protection Lot credits based on the provision of land for esplanade reserves and esplanade strips as listed in Appendix 4A of the District Plan.

1. Minimum feature sizes for the creation of a single on-site Protection Lot or Transferable Protection Lot credit and minimum average feature sizes for the creation of two to five

on-site Protection Lots or any number of Transferable Protection Lot credits are shown in the table below.

<u>Feature Type</u>	<u>Minimum feature sizes for the creation of a single on-site Protection Lot or Transferable Protection Lot credit</u>	<u>Minimum feature sizes for the creation of two to five on-site Protection Lots, or any number of Transferable Protection Lot credits</u>				
		<u>Avg</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
<u>Esplanade Reserves/Strips In Appendix 4A</u>	<u>500m in length 130m in length 20m wide</u>	<u>1km 20m</u>	<u>2km 20m</u>	<u>3km 20m</u>	<u>4km 20m</u>	<u>5km 20m</u>
Note <u>The creation of further Transferable Protection Lot credits shall be allowed in accordance with the average specified for the particular feature type.</u>						

2. ~~Any esplanade reserve or strip identified in Appendix 4A is able to be combined with any other esplanade reserve or strip identified in Appendix 4A with the express intention of combining their lengths to meet the specified minimum feature size for a single on-site Protection Lot or Transferable Protection Lot credit.~~

3. ~~Where esplanade reserves or strips have been combined to meet the minimum feature size in accordance with the above, all of the esplanade reserves or strips will be protected and the single on-site Protection Lot or Transferable Protection Lot credit shall only benefit one of the contributing lots.~~

4. Within the subject existing lot or lots, where an esplanade reserve or strip exceeds the above sizes then the entire feature or features shall be protected.

Advice Note: Esplanade reserves and esplanade strips created through this rule will not receive compensation in accordance with section 237E(2) of the RMA.

The following submissions are therefore:

Accepted

Submission	Point Number	Name
22	7	D155 Limited

3.7 Reason

- 3.7.1** While Option 2, when compared with Option 1, allows slightly more on-site protection lots to be created in the Rural Zone and rewards some landowners much less than others in terms of how much land they need provide before receiving a protection lot, it is more likely to achieve the purpose of the Plan Change.

4.0 Topic 3: Advice note on compensation not being payable in accordance with s237E (2) of the RMA

4.1 Background

Because protection lots are being offered as a financial incentive for landowners in return for the provision of land for esplanade reserves and strips, the following advice note was included in Plan Change 53.

Advice Note: Esplanade reserves and esplanade strips created through this rule will not receive compensation in accordance with section 237E(2) of the RMA.

4.2 Submission Points

- 4.2.1** D155 Limited opposes the advice note and state that the District Plan cannot override the RMA.
- 4.2.2** This is supported by the further submission of Gideons Valley Trust. They say protection lots should not be in lieu of the Council's statutory obligations set out under the RMA.
- 4.2.3** Bay of Plenty Regional Council's further submission opposes D155 Limited's submission because the protection lot system provides economic opportunities to landowners that wouldn't otherwise exist and to also seek compensation would be akin to double dipping.

4.3 Discussion

- 4.3.1** Section 237E(2) of the RMA requires a territorial authority to pay compensation for the area of an esplanade reserve or greater than 20 metres wide (if required) unless the registered proprietor agrees otherwise. The advice note in Plan Change 53 is not considered to override s237E(2) because it allows landowners to undergo a voluntarily process of providing esplanade reserves or strips in exchange for subdivision opportunities they previously did not have. Any protection lot subdivision will be in agreement between Council and the registered proprietor and the use of a protection lot subdivision is a form of compensation in itself. This is covered in case law and is known as the Augier principle.

4.3.2 Because protection subdivision based on the provision of land for esplanade reserves and strips is a controlled activity, an additional matter of control is necessary to require the waiving of the right to compensation under the RMA, otherwise this form of subdivision would need to be a restricted discretionary activity.

4.4 Recommendation

4.4.1 That the advice note be retained as notified.

4.4.2 That a new matter of control be added as follows;

"Matters of Control

Protection lot subdivision based on the provision of land for esplanade reserves and strips.

Council shall exercise control over the following;

The landowner has waived the right to compensation under s237E(2) under the RMA."

The following submissions are therefore:

Accepted

Submission	Point Number	Name
8	6	Bay of Plenty Regional Council

Rejected

Submission	Point Number	Name
22	6	D155 Limited
83	1	Gideons Valley Trust

4.5 Reason

4.5.1 The advice note in Plan Change 53 is not considered to override s237E(2) because it allows landowners to undergo a voluntarily process of providing esplanade reserves or strips in exchange for subdivision opportunities they previously did not have. Any protection lot subdivision will be in agreement between Council and the registered proprietor and the use of a protection lot subdivision is a form of compensation in itself.

4.5.2 Because protection subdivision based on the provision of land for esplanade reserves and strips is a controlled activity, an additional matter of control is necessary to require the waiving of the right to compensation under the RMA, otherwise this form of subdivision would need to be a restricted discretionary activity.

5.0 Topic 4: Activity status for other proposed esplanade reserves and strips not listed in Appendix 4A

5.1 Background

Protection lot subdivision using those proposed esplanades listed as a priority in Appendix 4A is proposed to be a controlled activity for up to two lots off a sealed road. Protection lot subdivision using other proposed esplanades is currently not provided for at all and so defaults to a non-complying activity.

5.2 Submission Points

5.2.1 D155 Limited's submission seeks more enabling provisions. They have since clarified to staff that they request that esplanade reserves or strips not listed in proposed Appendix 4A be provided for as discretionary activities as opposed to non-complying activities (as they are at present).

5.3 Discussion

5.3.1 Specific waterways have been targeted as a priority for the reasons given in Topic 1. Controlled activity status acknowledges that these are a priority and will have minor effects. Those "other" proposed esplanades which are not a priority are not provided for within the protection lot rules so that they remain a non-complying activity. This signals that such an activity is not anticipated and/or appropriate and gives Council greater ability to decline inappropriate applications.

5.3.2 Discretionary status on the other hand signals that such an activity is generally anticipated and/or appropriate subject to an assessment of effects. This will make it more difficult for Council to decline inappropriate applications and may result in a proliferation of protection lot subdivisions in the Rural Zone without any of these other linkages being completed. Council, in the future, may choose to target other proposed esplanades and the activity status will need to be reviewed at that time.

5.4 Recommendation

That the activity status for "other" esplanade reserves or strips not listed in Appendix 4A remains non-complying.

The following submissions are therefore:

Rejected

Submission	Point Number	Name
22	7	D155 Limited

5.5 Reason

5.5.1 Those “other” proposed esplanades which are not a priority are not provided for within the protection lot rules so that they remain a non-complying activity. This signals that such an activity is not anticipated and/or appropriate and gives Council greater ability to decline inappropriate applications. Discretionary status on the other hand signals that such an activity is generally anticipated and/or appropriate subject to an assessment of effects. This will make it more difficult for Council to decline inappropriate applications and may result in a proliferation of protection lot subdivisions in the Rural Zone without any of these other linkages being completed.

6.0 Topic 5: Subdivision (including boundary adjustment) being used as a measure to acquire esplanades

6.1 Submission Points

6.1.1 Gideons Valley Trust’s further submission opposes the triggering of rules as a mandatory measure for Council to obtain esplanades. They particularly oppose boundary adjustment (deemed as subdivision under the RMA) being a measure to obtain esplanades.

6.2 Discussion

6.2.1 The RMA allows Council to include rules in its District Plan to acquire proposed esplanade reserves or strips when land is subdivided (including through boundary adjustment which is a form of subdivision). Council has included such rules within Section 12A of the District Plan. These rules are well established and not subject to review under this Plan Change. Instead, this Plan Change introduces new rules which allow subdivision to occur so that these existing rules can be used.

6.3 Recommendation

That there are no changes made to Section 12A of the District Plan with respect to subdivision being a measure to acquire esplanades.

The following submissions are therefore:

Rejected

Submission	Point Number	Name
83	1	D155 Limited

6.4 Reason

6.4.1 The RMA allows Council to include rules in its District Plan to acquire proposed esplanade reserves or strips when land is subdivided (including through boundary adjustment which is a form of subdivision). Council has included such rules within Section 12A of the District Plan. These rules are well established and not subject to review under this Plan Change. Instead, this Plan Change introduces new rules which allow subdivision to occur so that these existing rules can be used.

7.0 Plan Change 53 - Recommended Changes to the District Plan First Review

7.1 The purpose of this part of the report is to show the Proposed Plan Change in full including any recommended changes in response to the submissions and further submissions.

7.2 Recommended changes to the District Plan First Review are shown as follows; existing District Plan text in black, proposed changes as included in the Section 32 Report in red, and recommendations as a result of this Planning Report in blue.

7.3 Amend proposed Rule 18.4.2 (h) (vii) as follows;

4. Land for the provision of esplanade reserves and esplanade strips as listed in Appendix 4A of the District Plan.

7.4 Add new standards as Rule 18.4.2(h)(vii) as follows;

(vii) Standards for the creation of on-site Protection Lots or Transferable Protection Lot credits based on the provision of land for esplanade reserves and esplanade strips as listed in Appendix 4A of the District Plan.

1. Minimum feature sizes for the creation of a single on-site Protection Lot or Transferable Protection Lot credit and minimum average feature sizes for the creation of two to five on-site Protection Lots or any number of Transferable Protection Lot credits are shown in the table below.

<u>Feature Type</u>	<u>Minimum feature sizes for the creation of a single on-site Protection Lot or Transferable Protection Lot credit</u>	<u>Minimum feature sizes for the creation of two to five on-site Protection Lots, or any number of Transferable Protection Lot credits</u>				
		<u>Avg</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>

<u>Esplanade Reserves/Strips In Appendix 4A</u>	<u>500m in length 130m in length 20m wide</u>	<u>1km 20m</u>	<u>2km 20m</u>	<u>3km 20m</u>	<u>4km 20m</u>	<u>5km 20m</u>
Note <u>The creation of further Transferable Protection Lot credits shall be allowed in accordance with the average specified for the particular feature type.</u>						

2. ~~Any esplanade reserve or strip identified in Appendix 4A is able to be combined with any other esplanade reserve or strip identified in Appendix 4A with the express intention of combining their lengths to meet the specified minimum feature size for a single on-site Protection Lot or Transferable Protection Lot credit.~~
3. ~~Where esplanade reserves or strips have been combined to meet the minimum feature size in accordance with the above, all of the esplanade reserves or strips will be protected and the single on-site Protection Lot or Transferable Protection Lot credit shall only benefit one of the contributing lots.~~
4. Within the subject existing lot or lots, where an esplanade reserve or strip exceeds the above sizes then the entire feature or features shall be protected.

Advice Note: Esplanade reserves and esplanade strips created through this rule will not receive compensation in accordance with section 237E(2) of the RMA.

7.5 Add a new matter of control as follows;

Matters of Control

Protection lot subdivision based on the provision of land for esplanade reserves and strips.

Council shall exercise control over the following;

The landowner has waived the right to compensation under s237E(2) under the RMA.

7.6 Add "esplanade strip" to Rule 18.4.2 (ix) "Legal Protection" as follows;

"Legal protection of the feature shall be achieved by way of a condition imposed on the subdivision consent requiring a Consent Notice, Memorandum of Encumbrance or similar legal instrument such as a QEII Covenant, Heritage Covenant, Esplanade Strip, or the vesting of land into crown or territorial authority ownership. The type of instrument and the

level of protection provided by it must be to the satisfaction of the Council and where relevant is to be registered on the title of the land containing the feature to be protected. All costs associated with compliance with this requirement shall be met by the applicant.”

7.7 Add a new Appendix 4A as follows;

Schedule of Proposed Esplanade Reserves and Strips Eligible for Protection Lots

<u>Appendix 4 Reference</u>	<u>ParcelID</u>	<u>Legal Description</u>	<u>Area (m²)</u>	<u>Length (m)</u>
<u>Uretara</u>				
<u>1(4)</u>	<u>1109/631</u>	<u>Lot 2 DPS48753</u>	<u>190,983</u>	<u>791</u>
<u>1(4)</u>	<u>1116/10</u>	<u>Lot 2 DPS80374</u>	<u>64,852</u>	<u>161</u>
<u>1(4)</u>	<u>1116/13</u>	<u>Lot 1 DP338589</u>	<u>63,525</u>	<u>714</u>
<u>1(4)</u>	<u>1116/2410</u>	<u>Lot 6 DPS33673</u>	<u>67,726</u>	<u>533</u>
<u>1(4)</u>	<u>1116/2540</u>	<u>Lot 11 DPS34349</u>	<u>1,886</u>	<u>10</u>
<u>1(4)</u>	<u>1118/1601</u>	<u>Lot 1 DPS29667</u>	<u>63,040</u>	<u>617</u>
<u>1(4)</u>	<u>1118/223</u>	<u>Lot 3 DPS67279</u>	<u>94,691</u>	<u>311</u>
<u>1(4)</u>	<u>1122/1264</u>	<u>Pt Lot 1 DPS16412</u>	<u>56,705</u>	<u>641</u>
<u>Ohourere</u>				
<u>1(11)</u>	<u>1304/148</u>	<u>Pt Lot 4 DP15898</u>	<u>152725</u>	<u>634.24</u>
<u>1(11)</u>	<u>1304/151</u>	<u>Lot 1 DPS1013</u>	<u>2672</u>	<u>203.74</u>
<u>1(11)</u>	<u>1304/4888</u>	<u>Te Irihanga 2A Block</u>	<u>22999</u>	<u>762.89</u>
<u>1(11)</u>	<u>1304/98</u>	<u>Pt Lot 3 DPS58017</u>	<u>74033</u>	<u>485.08</u>
<u>1(11)</u>	<u>1304/99</u>	<u>Pt Lot 1 DPS10175</u>	<u>3339</u>	<u>74.52</u>
<u>1(11)</u>	<u>1325/3671</u>	<u>Lot 3 DPS59030</u>	<u>345073</u>	<u>1278.59</u>
<u>Wairoa</u>				
<u>1(17)</u>	<u>1325/301</u>	<u>Pt Lot 1 DP27916</u>	<u>14744</u>	<u>153.47</u>
<u>1(17)</u>	<u>1325/3642</u>	<u>Lot 1 DPS62108</u>	<u>57608</u>	<u>361.38</u>
<u>1(17)</u>	<u>1325/3669</u>	<u>Lot 4 DPS59030</u>	<u>81920</u>	<u>418.72</u>
<u>1(17)</u>	<u>1325/461</u>	<u>Lot 2 DP27916</u>	<u>10972</u>	<u>157.55</u>
<u>3(Other)</u>	<u>1310/238</u>	<u>Pt Poripori Farm A Block</u>	<u>361300</u>	<u>4343.01</u>
<u>3(4)</u>	<u>3008/115</u>	<u>Pt Allot 144 Te Papa PSH</u>	<u>194445</u>	<u>297.95</u>
<u>3(4)</u>	<u>3008/116</u>	<u>Pt Allot 143 Te Papa PSH</u>	<u>137402</u>	<u>401.09</u>
<u>3(4)</u>	<u>3008/8624</u>	<u>Lot 3 DPS287</u>	<u>7318</u>	<u>215.28</u>
<u>3(4)</u>	<u>3008/9110</u>	<u>Lot 3 DPS374</u>	<u>4411</u>	<u>376.56</u>
<u>3(4)</u>	<u>3008/9114</u>	<u>Lot 2 DPS374</u>	<u>2698</u>	<u>138.32</u>
<u>Waimapu</u>				
<u>1(29)</u>	<u>1349/1058</u>	<u>Lot 4 DP22965</u>	<u>36476</u>	<u>192.19</u>
<u>1(29)</u>	<u>1349/13</u>	<u>Pt Lot 2 DP22964</u>	<u>17996</u>	<u>591.79</u>
<u>1(29)</u>	<u>1349/1774</u>	<u>Lot 1 DPS58351</u>	<u>67043</u>	<u>283.61</u>
<u>1(29)</u>	<u>1349/2060</u>	<u>Lot 2 DPS42381</u>	<u>115899</u>	<u>661.78</u>
<u>1(29)</u>	<u>1349/51</u>	<u>Lot 4 DP350004</u>	<u>45811</u>	<u>207.28</u>
<u>1(29)</u>	<u>1352/13496</u>	<u>Pt Section 25 Ohauti SETT</u>	<u>591626</u>	<u>605.53</u>

<u>1(29)</u>	<u>1352/9586</u>	<u>Lot 3 DPS47615</u>	<u>103937</u>	<u>819.94</u>
<u>1(29)</u>	<u>1481/2931</u>	<u>Lot 1 DP34157</u>	<u>25837</u>	<u>348.03</u>
<u>1(30)</u>	<u>1347/2039</u>	<u>Lot 3 DP15326</u>	<u>20249</u>	<u>254.07</u>
<u>1(30)</u>	<u>1347/2343</u>	<u>Lot 5 DP15326</u>	<u>13360</u>	<u>184.63</u>
<u>1(30)</u>	<u>1472/2591</u>	<u>Lot 3 DPS53905</u>	<u>73491</u>	<u>372.17</u>
<u>Tauranga Harbour</u>				
<u>2(1)</u>	<u>1045/2517</u>	<u>Pt Allot 5 Tahawai PSH</u>	<u>392816</u>	<u>1085.03</u>