

# **Western Bay of Plenty District Council**

## **Change to the District Plan – First Review**

### **Plan Change 66 Historic Heritage – Clarification of Whether Particular Rules Apply to Cultural or Built Features**

#### **Section 32 Report**

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## **1.0 Introduction**

### **1.1. General Introduction and Background**

The purpose of this Plan Change is to:

- Review a number of specific provisions within the Historic Heritage Section which are not entirely clear and/or which are ambiguous in terms of whether they apply to cultural or built heritage features or both.
- Review the built heritage rules in terms of whether they account for the protection of those parts of built heritage features which are not buildings or objects, but which still contribute to the features significance, such as trees or reserves.

## **2.0 Resource Management Act 1991**

### **2.1. Section 32**

Before a proposed plan change can be publicly notified the Council is required under section 32 ("s.32") of the Act to carry out an evaluation of alternatives, costs and benefits of the proposed review. With regard to the Council's assessment of the proposed plan change s.32 requires the following:

- 1) An evaluation report required under this Act must—*
  - (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
  - (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
    - (i) identifying other reasonably practicable options for achieving the objectives; and*
    - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
    - (iii) summarising the reasons for deciding on the provisions; and*
  - (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
- (2) An assessment under subsection (1)(b)(ii) must—*
  - (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
    - (i) economic growth that are anticipated to be provided or reduced; and*
    - (ii) employment that are anticipated to be provided or reduced; and*
  - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and*
  - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*
- 3) If the proposal (an amending proposal) will amend a standard, statement, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—*

- (a) *the provisions and objectives of the amending proposal; and*
- (b) *the objectives of the existing proposal to the extent that those objectives—*
  - (i) *are relevant to the objectives of the amending proposal; and*
  - (ii) *would remain if the amending proposal were to take effect.*

*4) If the proposal will impose a greater prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.*

## **2.2. Section 74**

In accordance with Section 74(2A) of the Act, Council must take into account any relevant planning document recognised by an iwi authority lodged with Council.

None of the iwi management plans that have been lodged with Council raised any issues which are of relevance to this Plan Change. The purpose of this Plan Change is limited to clarifying certain rules that are not clear in terms of whether they relate to cultural or built features. It is also important to note that this Plan Change does not change the level of protection given to existing cultural heritage features nor does it propose to add or remove any cultural heritage features.

## **3.0 Consultation**

Due to the minor and technical nature of this proposed change there has been no specific consultation with the public.

Council engaged with the surveying and planning community in the Western Bay of Plenty and Tauranga area via the "Surveyors Newsletter".

## **4.0 Issue 1 – Discretionary Activities 7.3.3 (c) and (f)**

### **Discretionary Activity 7.3.3 (c)**

Discretionary Activity 7.3.3 (c) reads as follows:

"(c) Excavation, alteration, or reconstruction of any scheduled historic heritage feature."

This rule was first introduced in the Proposed District Plan (notified version). However, the final wording shown above (decisions and operative versions) differs significantly from what was initially notified, which is shown below.

"(...)" "Excavation, alteration, reconstruction or destruction of any scheduled site or object of cultural and natural heritage value to tangata whenua."

Initially, the rule was intended to give protection to scheduled cultural heritage features i.e. those listed in Appendix 3 of the District Plan. This is

evident from the Section 32 Report. However, the final wording ended up including built heritage features as well by virtue of referring generally to historic heritage features (which includes both cultural and built heritage features). This has imposed a discretionary activity status over all built heritage features and makes the reading of the activity lists confusing because in many cases built heritage features are specifically provided for as permitted or controlled activities.

A review of the planning and decision reports shows that this was not the intention and rather the intention was to ensure that the rule only applied to scheduled cultural heritage features (in Appendix 3) as opposed to any site which was considered significant by iwi and hapu. The latter are currently being identified for inclusion into Appendix 3 through a separate Plan Change. It appeared that there was some confusion over how the notified rule was drafted but it isn't apparent why because the notified wording did make it clear that the rule only applied to "scheduled" sites and therefore did not need to be modified in that respect.

Another issue with Discretionary Activity 7.3.3 (c) is that it is very similar in purpose to 7.3.3 (f). For instance both rules cover "excavation" and in effect both have the same intention of protecting cultural heritage features from any form of alteration.

**Discretionary Activity 7.3.3 (f)**

Rule 7.3.3 (f) reads as follows:

"(f) Excavation, *construction* or any other work on or within a 20m radius of the scheduled feature including the use of heavy machinery and the planting of trees on or adjoining an archaeological site. Land for which historic heritage issues have already been assessed and consent granted shall be exempt from this rule."

A separate issue with this rule is that it is not entirely clear that it is only intended to apply to cultural heritage features because it refers generally to "the scheduled feature" and "an archaeological site". Activities such as excavation, construction "on", other works "on", use of heavy machinery and planting of trees are all intended to relate to cultural heritage features e.g. to pa rather than buildings. Furthermore, as already discussed, the rules never intended for all built heritage features to be discretionary activities which is further evidence that this is an oversight.

**4.1. Option 1 – Status Quo – Discretionary Activity 7.3.3 (c) remains drafted as follows:**

**"(c) Excavation, alteration, or reconstruction of any scheduled historic heritage feature."**

<b>Benefits</b>	<ul style="list-style-type: none"> <li>▪ Gives protection to cultural heritage features.</li> </ul>
<b>Costs</b>	<ul style="list-style-type: none"> <li>▪ The wording does not reflect the original intent of the rule which was to give protection to cultural heritage</li> </ul>

	<p>features only.</p> <ul style="list-style-type: none"> <li>▪ Unnecessarily gives further protection to built heritage features which are already protected by other specific rules.</li> <li>▪ Creates confusion in terms of which activity status applies to built heritage features because this rule applies a discretionary status to them however they are specifically provided for as permitted or controlled activities elsewhere in many instances.</li> <li>▪ Increases restrictions on those landowners with built heritage features on their properties.</li> <li>▪ The rule is very similar in purpose to Discretionary Activity 7.3.3 (f) and it is not apparent why it is a stand alone rule. Creates confusion for plan readers.</li> </ul>
<b>Effectiveness/ Efficiency</b>	<ul style="list-style-type: none"> <li>▪ Effective in terms of protecting cultural heritage features. However, not effective in terms of protecting built heritage features as these are already protected by other specific rules.</li> <li>▪ Not efficient in the sense that it provides unnecessary protection for built heritage features and puts unnecessary restrictions on landowners.</li> </ul>
<b>Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter</b>	<ul style="list-style-type: none"> <li>▪ N/A – sufficient information is available.</li> </ul>

**4.2. Option 2 - Discretionary Activity 7.3.3 (c) is amended so that it only applies to scheduled cultural heritage features and not scheduled built heritage features, as follows:**

**“(c) Excavation, alteration, or reconstruction of any scheduled historic cultural heritage feature.”**

<b>Benefits</b>	<ul style="list-style-type: none"> <li>▪ The wording change reflects the original intent of the rule which was to give protection to cultural heritage features only.</li> <li>▪ Removes unnecessary further protection to built heritage features which are already protected by other specific rules.</li> <li>▪ Removes confusion about which activity status applies to built heritage features.</li> <li>▪ Removes unnecessary restrictions on landowners with built heritage features on their properties.</li> </ul>
<b>Costs</b>	<ul style="list-style-type: none"> <li>▪ The rule remains very similar in purpose to Discretionary Activity 7.3.3 (f) and it is not apparent why it is a stand alone rule. Creates confusion for plan readers.</li> </ul>
<b>Effectiveness/ Efficiency</b>	<ul style="list-style-type: none"> <li>▪ Effective at protecting cultural heritage features.</li> <li>▪ Efficient in that it only provides protection for cultural heritage features and not built heritage features and</li> </ul>

	removes unnecessary restrictions on landowners.
<b>Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter</b>	<ul style="list-style-type: none"> <li>▪ N/A – sufficient information is available.</li> </ul>

#### 4.3. Option 3 –

- **Discretionary Activity 7.3.3 (c) is deleted; and**
- **Those points from Discretionary Activity 7.3.3 (c) which are not already covered in Discretionary Activity 7.3.3 (f), namely “alteration” and “reconstruction”, are merged into it; and**
- **Discretionary Activity 7.3.3 (f) is amended to make it clear that it only applies to cultural heritage features.**

<b>Benefits</b>	<ul style="list-style-type: none"> <li>▪ Removes the duplication between the two Discretionary Activities. Makes the rules easier to interpret.</li> <li>▪ Does not weaken the protection of cultural heritage features because all restrictions are retained.</li> <li>▪ Removes unnecessary further protection to built heritage features which are already protected by other specific rules.</li> <li>▪ Removes confusion about which activity status applies to built heritage features.</li> <li>▪ Removes unnecessary restrictions on landowners with built heritage features on their properties.</li> </ul>
<b>Costs</b>	<ul style="list-style-type: none"> <li>▪ None</li> </ul>
<b>Effectiveness/ Efficiency</b>	<ul style="list-style-type: none"> <li>▪ Effective at protecting cultural heritage features.</li> <li>▪ Efficient in that it only provides protection for cultural heritage features and not built heritage features and removes unnecessary restrictions on landowners. Also efficient in that it removes a duplication within the rules and makes the rules easier to interpret.</li> </ul>
<b>Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter</b>	<ul style="list-style-type: none"> <li>▪ N/A – sufficient information is available.</li> </ul>

#### 4.4. Preferred Option

The preferred option is Option 3, with proposed wording as follows;

~~“(c) — Excavation, alteration, or reconstruction of any scheduled historic heritage feature.”~~

- “(f) Alteration or reconstruction of any cultural heritage feature or excavation, construction, or any other work on or within a 20m radius of ~~the-scheduled~~ any cultural heritage feature including the use of heavy machinery and the planting of trees on or adjoining any cultural heritage feature ~~an-archaeological-site~~. Land for which historic heritage issues have already been assessed and consent granted shall be exempt from this rule.”

#### 4.5. Reasons

This option is the most effective and efficient way of fixing all of the issues identified with Discretionary Activities 7.3.3 (c) and (f). It has many advantages and no disadvantages. The deletion of 7.3.3 (c) removes unnecessary restrictions on built heritage features which are already protected by other rules and removes uncertainty about which activity status applies to built heritage features. Meanwhile, the carrying across of restrictions from 7.3.3 (c) to 7.3.3 (f) which were not otherwise covered by 7.3.3 (f) ensures that cultural heritage features retain the same level of protection. Merging these two rules together, which is essentially what is being proposed, makes the rules tidier and easier to use. The redrafting of Rule 7.3.3 (f) was necessary so that it is made clear that it only applies to cultural heritage features.

### 5.0 Issue 2 – Built Heritage Features with aspects other than buildings and structures which contribute to their significance

There are a number of built heritage features protected by the District Plan. The majority of these features are in fact “built” for example buildings such as churches, halls and homesteads and structures such as memorial gates, bridges and headstones. These types of features are protected by specific rules which regulate maintenance, restoration, repair, alterations and additions.

However, there are also a number of built heritage features which either are “non-built” or have aspects that are “non-built” which also contribute to their significance but which appear to have been overlooked for protection under the District Plan rules. This includes items such as trees, graves, subsurface remains, and land within domains and reserves. In addition to these, a bridge embankment was recently introduced into Appendix 3 as a cultural heritage feature (109) because of uncertainty whether this would be sufficiently protected by the built heritage rules (or lack of). This should otherwise have been a built heritage feature along with the piles which were classified separately as built heritage feature 66.

The specific examples of these types of features are shown in the table below. **Note:** The “significance” description is only a brief summary of a feature’s significance. More information is contained within background reports such as heritage inventories prepared under the District Plan Review. For example, the Uretara Domain has trees, a rugby pavilion, a

shed, stables, a library, a hall, and the recreational reserve identified as being significant.

Item		Significance
24.	Uretara Domain (Category B)	Associated with the development of recreational activities in Katikati and the early development of the township.
41.	Old Te Puke Cemetery (Category B)	Includes pre-1900 gravestones which contain significant social and stylistic information. Contains the graves of many early settlers.
44.	Olive Tree, Jubilee Park (Category B)	Commemorative value as a memorial to the Battle of Crete during WW2.
46.	Wharekahu Cemetery (Category A)	Pre-1900 site with significant social archaeological information on the headstones. Contains headstones of important local identities.
49.	European Trees (Ivy Isles site) Category B)	Site contains remnants of a house built in 1883. It is one of few archaeological sites in the <i>District</i> .
54.	Gerald Crapp Historic Reserve (Category A)	Associated with the early European settlement of Omokoroa Point. Potential for subsurface remains of the Gellibrand/Crapp Homesteads and historic occupation of the area.

Item		Significance
109	Bridge Embankment T13/341	Bridge embankment on former ECMT.

These “non-built” aspects of built heritage features also need to be protected by specific rules. Similar rules which apply to cultural heritage features may be appropriate given these “non-built” aspects can also be compromised by the likes of excavation, or construction and works occurring on them.

**Note:** Discretionary Activity 7.3.3 (c) may technically offer some protection to these “non-built” aspects, however, as discussed in Issue 2, this is not the intention of the rule and it has become problematic for a number of reasons and hence is proposed to be deleted.

**5.1. Option 1 – Status Quo – No rules protecting those parts of built heritage features which are “non-built” but which contribute to the significance of that feature.**

<b>Benefits</b>	<ul style="list-style-type: none"> <li>Fewer restrictions on landowners with built heritage features on their properties.</li> </ul>
<b>Costs</b>	<ul style="list-style-type: none"> <li>Items such as trees, graves, subsurface remains, and land within domains and reserves which are identified as having significant historic heritage value to the District may be adversely affected by development.</li> </ul>
<b>Effectiveness/ Efficiency</b>	<ul style="list-style-type: none"> <li>Not effective at protecting items such as trees, graves, subsurface remains, and land within domains and reserves which are identified as having significant historic heritage value to the District.</li> <li>Not efficient as it creates uncertainty.</li> </ul>
<b>Risks of Acting/ Not Acting if there is</b>	<ul style="list-style-type: none"> <li>N/A – sufficient information is available.</li> </ul>



<b>uncertain or insufficient information about the subject matter</b>	
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**5.2. Option 2 – Introduce a new discretionary activity protecting those parts of built heritage features which are “non-built” but which contribute to the significance of that feature, as follows:**

- (x) Alteration, reconstruction or removal of, or excavation, construction or any other work on, any part of a built heritage feature which is not a building or structure but which has been identified as contributing to the significance of that feature.

Note: This includes but is not limited to items such as trees, graves, subsurface remains, bridge embankments and land within domains and reserves.

<b>Benefits</b>	<ul style="list-style-type: none"> <li>▪ Covers all activities which could result in adverse effects on these types of built heritage features.</li> <li>▪ Discretionary activity status is consistent with how the same activities are treated with respect to cultural heritage features which are mostly “non-built” also.</li> <li>▪ Council can decline discretionary applications where these activities will have adverse effects on built heritage features that cannot be adequately mitigated. This is different to controlled activities which cannot be declined by Council.</li> <li>▪ General matters of discretion have already been established in Section 7 – Historic Heritage and cover the range of matters that Council are likely to consider in relation to the protection of these features.</li> <li>▪ Council will be able impose any conditions in relation to any matter that helps to control any of these activities potential adverse effects.</li> <li>▪ Ensures the protection of these types of features.</li> </ul>
<b>Costs</b>	<ul style="list-style-type: none"> <li>▪ Restrictions on landowners. These restrictions already exist but are not clear within the existing rules.</li> </ul>
<b>Effectiveness/ Efficiency</b>	<ul style="list-style-type: none"> <li>▪ Effective at protecting those parts of built heritage features which are “non-built” but which contribute to the significance of that feature.</li> <li>▪ Efficient as it only requires the introduction of new wording.</li> </ul>
<b>Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter</b>	<ul style="list-style-type: none"> <li>▪ N/A – sufficient information is available.</li> </ul>

**5.3. Option 3 – In conjunction with Option 2, delete Cultural Heritage Feature 109 and merge it with Built Heritage Feature 66, as follows;**

109	<del>Bridge Embankment T13/341</del>	<del>Lot 198 DP 369442 Sec 4 SO 23764 Sec 4 SO 25382</del>	<del>Bridge —embankment—on former ECMT.</del>
66	Bridge <u>and</u> Embankment T13/341	<u>Lot 198 DP 369442 Sec 4 SO 23764 Sec 4 SO 25382</u>	Bridge <u>and</u> embankment on former ECMT.

<b>Benefits</b>	<ul style="list-style-type: none"> <li>This feature is most appropriately classified as a built heritage feature rather than a cultural heritage feature which are sites of significance to Maori. It was only classified as a cultural heritage feature temporarily because it was uncertain whether this feature would be sufficiently protected by the built heritage rules (or lack of).</li> <li>Continues to give the same protection that this feature received under the cultural heritage rules.</li> </ul>
<b>Costs</b>	<ul style="list-style-type: none"> <li>None. Restrictions on landowners are the same.</li> </ul>
<b>Effectiveness/ Efficiency</b>	<ul style="list-style-type: none"> <li>Remains effective at protecting this feature.</li> <li>Efficient as rules remain the same. Plus it removes confusion over why this bridge embankment was classified as a cultural heritage feature separately from the piles which were classified as a built heritage feature.</li> </ul>
<b>Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter</b>	<ul style="list-style-type: none"> <li>N/A – sufficient information is available..</li> </ul>

**5.4. Preferred Options**

The preferred options are Option 2 and Option 3 together.

Introduce a new discretionary activity protecting those parts of built heritage features which are “non-built” but which contribute to the significance of that feature, as follows:

(x) Alteration, reconstruction or removal of, or excavation, construction or any other work on, any part of a built heritage feature which is not a building or structure but which has been identified as contributing to the significance of that feature.

**Note:** This includes but is not limited to items such as trees, graves, subsurface remains, bridge embankments and land within domains and reserves.

Delete Cultural Heritage Feature 109 and merge it with Built Heritage Feature 66. The change to the text in Appendix 3 is shown below. The change to the site boundary map in Appendix 3 is shown in **Attachment A**. The change to the Planning Maps is shown in **Attachment B**.

109	<del>Bridge Embankment</del> T13/341	<del>Lot 198 DP 369442 Sec 4</del> SO 23764 Sec 4 SO 25382	<del>Bridge—embankment—on</del> former ECMT.
66	Bridge <u>and</u> Embankment T13/341	<u>Lot 198 DP 369442</u> Sec 4 SO 23764 <u>Sec 4 SO 25382</u>	Bridge <u>and</u> <u>embankment</u> on former ECMT.

## 5.5. Reasons

Introducing a new rule requiring discretionary resource consent for all activities which could have adverse effects on those parts of built heritage features which are “non-built” is the most effective way of protecting these types of features. It ensures that Council are able to impose any conditions in relation to any matter that helps to control any of these activities potential adverse effects, or decline an application if necessary to protect these types of features. It is necessary to introduce such a rule because there is currently no specific protection for these types of features.

Cultural heritage feature 109 has been deleted and merged with built heritage feature 109 because it is most appropriately classified as a built heritage feature rather than a cultural heritage feature which are sites of significance to Maori. It was only classified as a cultural heritage feature temporarily because it was uncertain whether this feature would be sufficiently protected by the built heritage rules (or lack of).

## 6.0 Issue 3 – Non Complying Activity 7.3.4

Non-Complying Activity 7.3.4 reads as follows:

“The demolition of any scheduled historic heritage feature”.

This rule was introduced in response to a submission to the District Plan Review and it was stated in the planning report that such a rule would “discourage demolition of scheduled buildings, limit damage to heritage values, and protect identified sites of cultural value”. The use of the words “scheduled historic heritage feature” shows that this rule applies to both built and cultural heritage features. However, the term “demolition” is generally associated with the process of knocking down or pulling apart buildings and structures. This could make it appear at first glance that the rule only applies to built heritage features. It also leaves some room for argument as to whether the destruction of a pa site (for example) would be caught by the term “demolition”.

### 6.1. Option 1 – Status Quo

<b>Advantages</b>	<ul style="list-style-type: none"> <li>▪ Allows Council strong grounds to decline any resource consent applications for the demolition of built heritage features.</li> </ul>
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	<ul style="list-style-type: none"> <li>Allows Council the ability to require and decline resource consent applications for the destruction of cultural heritage features. However, there is some uncertainty as described below.</li> </ul>
<b>Disadvantages</b>	<ul style="list-style-type: none"> <li>The rule may appear at first glance to apply only to built heritage features.</li> <li>Leaves some room for argument as to whether the destruction of a pa site (for example) would be caught by the term "demolition".</li> </ul>
<b>Effectiveness/ Efficiency</b>	<ul style="list-style-type: none"> <li>Not entirely effective due to the uncertainty.</li> <li>Not entirely efficient as this uncertainty could lead to arguments over interpretation and process.</li> </ul>
<b>Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter</b>	<ul style="list-style-type: none"> <li>N/A – sufficient information is available.</li> </ul>

**6.2. Option 2 – Non-Complying Activity 7.3.4 is amended as follows;**

**(x) The demolition or destruction of any scheduled historic heritage feature.**

<b>Advantages</b>	<ul style="list-style-type: none"> <li>Makes it certain that the rule applies to both the demolition of built heritage features and destruction of cultural heritage features.</li> </ul>
<b>Disadvantages</b>	<ul style="list-style-type: none"> <li>None</li> </ul>
<b>Effectiveness/ Efficiency</b>	<ul style="list-style-type: none"> <li>Effective in preventing the demolition of built heritage features or destruction of cultural heritage features.</li> <li>Efficient because the rule is clear and not open for interpretation or argument.</li> </ul>
<b>Risks of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter</b>	<ul style="list-style-type: none"> <li>There is uncertainty surrounding whether the term "demolition" captures the destruction of a pa (for example). There is a risk of not acting in that there is a small possibility of the wording of the rule being argued with respect to a proposed development. It would be best to clarify the wording now to prevent this possibility.</li> </ul>

**6.3. Preferred Option**

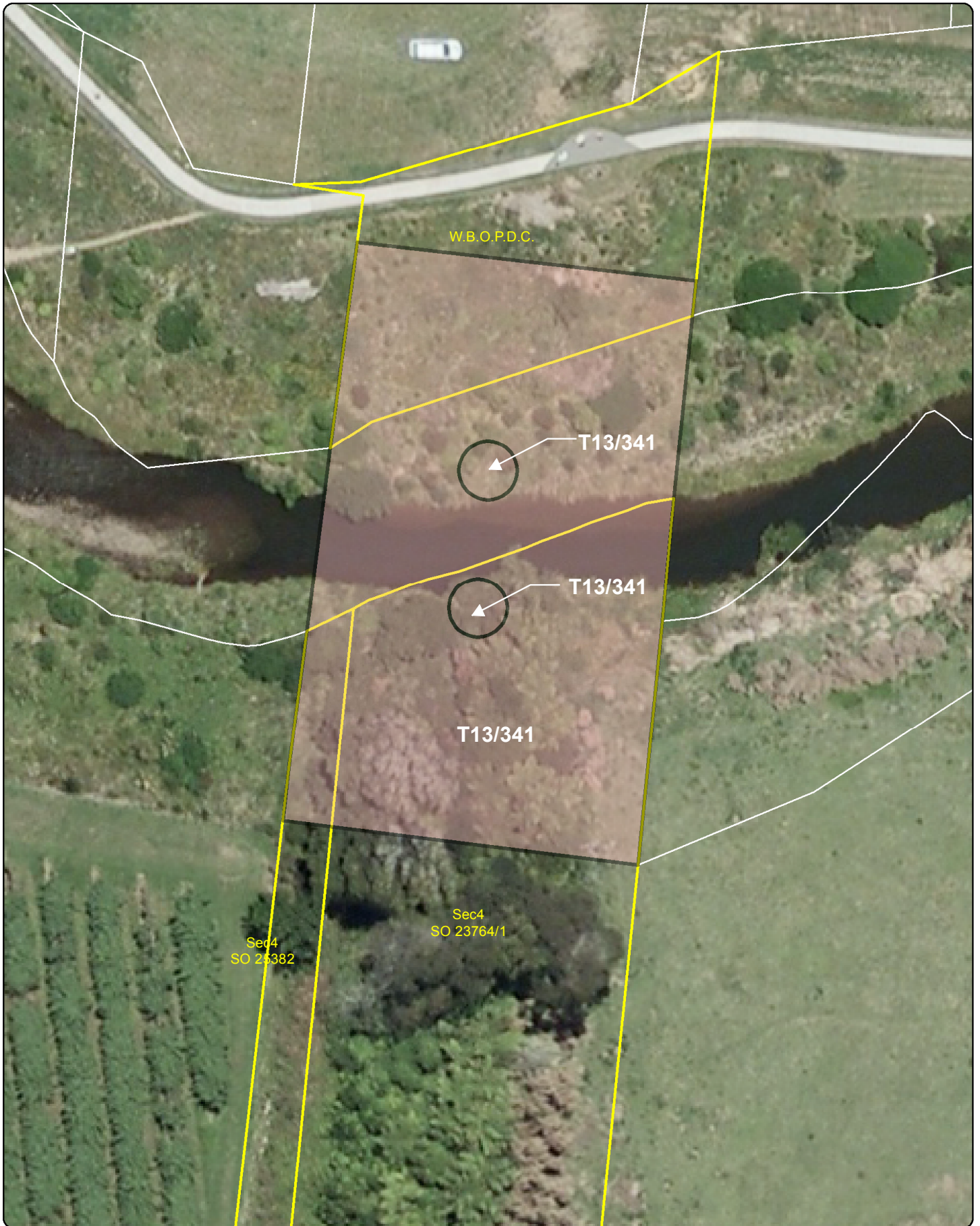
The preferred option is Option 2

That Non-Complying Activity 7.3.4 is amended as follows;

"(x) The demolition or destruction of any scheduled historic heritage feature."

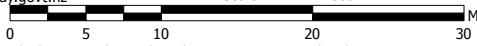
#### **6.4. Reasons**

The addition of the extra wording makes it certain that the rule applies to both the demolition of built heritage features and destruction of cultural heritage features and ensures the protection of such features.

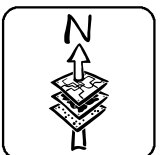


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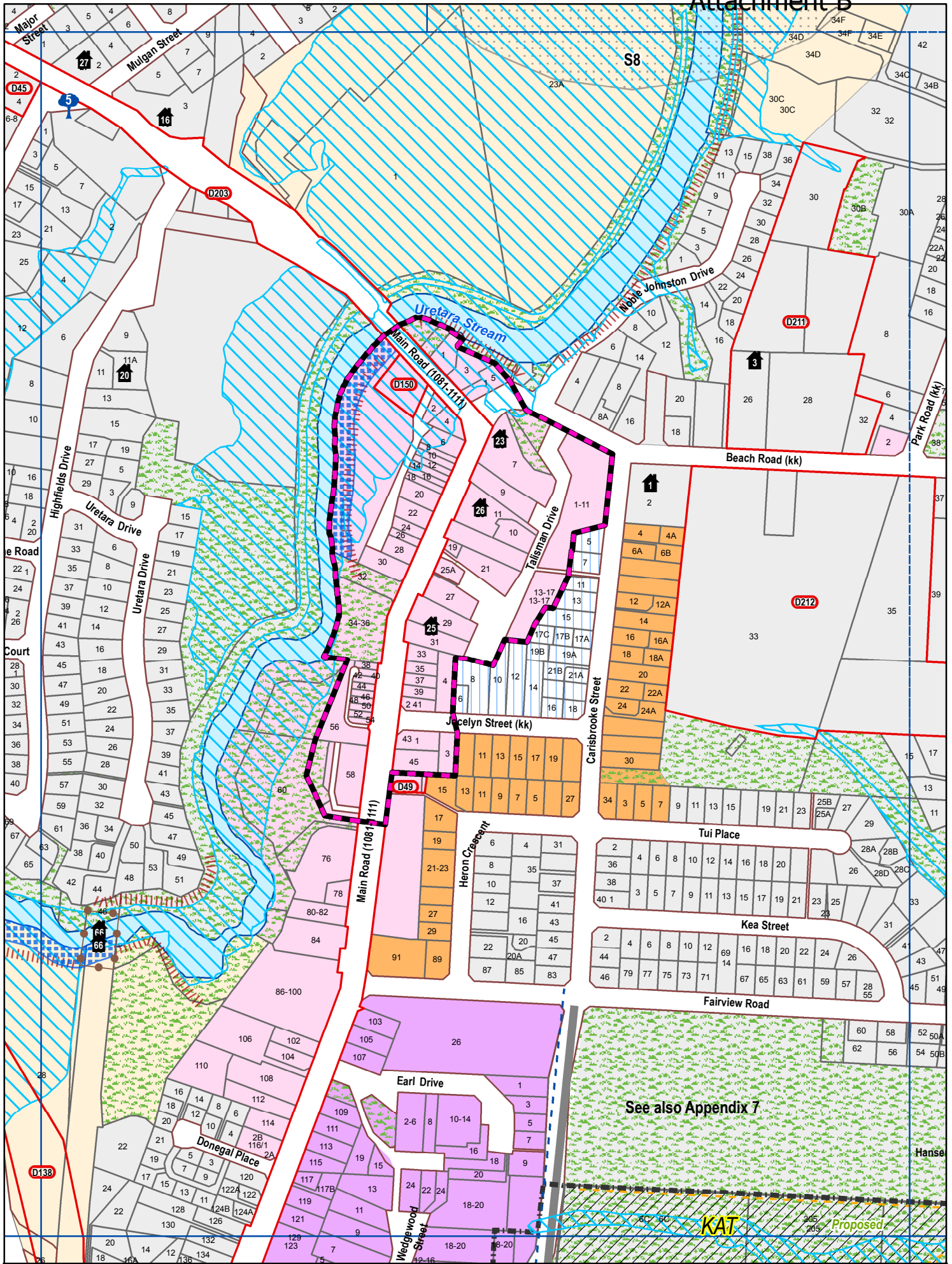
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**DISTRICT PLAN**  
**BUILT HERITAGE FEATURE 66**  
**BRIDGE AND EMBANKMENT (CATEGORY B)**



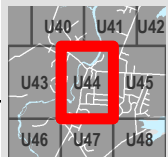




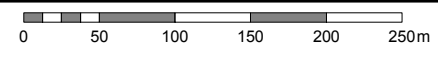
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Katikati



Western Bay of Plenty District Council



Scale 1:5000 (A4)

Revision Date: 6 February 2013

See also Appendix 7

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Proposed