

IN THE MATTER of the Resource Management Act 1991

AND of an appeal under Clause 14(1) of First Schedule to the
Resource Management Act 1991

BETWEEN TKC HOLDINGS LIMITED
Appellant

AND WESTERN BAY OF PLENTY DISTRICT COUNCIL
Respondent

NOTICE OF APPEAL

Clause 14(1) of the First Schedule Resource Management Act 1991

To: The Registrar
Environment Court
AUCKLAND

1. **TKC HOLDINGS LIMITED** ('the Appellant' or 'TKCH') appeals against decisions of the Western Bay of Plenty District Council (the 'Respondent') on Proposed Plan Change 46 and Variation 2 ("Proposed Plan Change" or "PC 46") to the Western Bay of Plenty District Plan.
2. The Appellant made submissions and further submissions on the Proposed Plan Change.
3. The Appellants received notice of the decisions on 23 April 2014.
4. The decisions were made by the Respondent. The Appellants are not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.

Decision being appealed

5. The decisions that are being appealed are the Respondent's decisions to decline to amend the Proposed Plan Change in accordance with the Appellant's submissions in relation to PC 46 and including the associated maps. The decisions made in relation to the Appellants submissions were to reject or accept only in part its submissions.

Provisions and Reasons for Appeals

6. The Appellant owns land on Matakana Island and has an interest in other lands on the Island referred to in the Proposed Plan Change as “the forested sand barrier”. The Appellant considers, in a general sense, that the principle component to have sensitive development on the forest sand barrier of the island is supportable. However the Respondents decisions on the Appellants submissions will not result in that outcome and will be more akin to an urban area. The Appellant therefore opposes some of the decisions on submissions because they do not promote sustainable management of its lands and are inconsistent with the purpose of the Act. The more particular provisions and reasons for the appeal are:

Plan Change 46 – General

- 6.1 The provisions relevant to the Matakana Island ‘farmland’ (or ‘Core’) and Rangiwaea Island areas provide for development densities that would compromise those productive areas. The provisions also enable a density of development that could take away a rural ‘feel’ and be more akin to an urban area. The Appellant consider the Respondent is selective around these issues and given the Proposed Plan Change is about Matakana Island, it has to include consideration of rules 18.3.2(g) – (h) and 18.3.3(c). Those provisions deal with development on the ‘Core’ of the Island and Rangiwaea Island which has a similar landscape character to the forested sand barrier.

Relief Sought

Consider rules 18.3.2(g) – (h) and 18.3.3(c) in the context of Plan Change 46. These matters need addressing along with the remainder of the Island.

Plan Change 46 – Natural Environment Provisions

- 6.2 PC 46/Variation 2 show on Planning Maps and in a Schedule proposed significant ecological features. For the submitters land the **maps** and **schedule** identifies **MI/1, MI/2, MI/4, MI/5, MI/12, MI/14, MI/15, MI/18, MI/19, MI/26 and MI/27**. The decisions version of PC 46 have increased these areas on the Appellants land as a result of the Department of Conservation submission. The provisions that apply to those mapped areas are contained in amended **Section 5 – Natural Environment** of the Proposed Plan Change. PC 46 amends part **5.4.2** (excluding Matakana Island from existing restricted discretionary activity rules) of that section, and amends other parts of the plan to now include **5.4.3** (new discretionary activities), **5.4.4** (new non-complying activity), and **5.6.2** (a new assessment criteria).
- 6.3 The submitters **oppose** all of the Natural Environment **provisions** (including the **schedule** and **maps**) of PC 46 and as they relate to their land holdings. The provisions lack the necessary balance to *promote sustainable management* of the land resource.
- 6.4 The **maps** do not accurately reflect the extent of the land used for production forestry including the drip line extent necessary for the landowners ETS obligations. The request for ecological areas needs to be balanced with the ETS regulations imposed by central government (they need consistent application).

Relief Sought

Review, reduce and amend the Significant Ecological Features Maps and Schedules for the Matakana Island Forested Sand Barrier to reflect the need to address the landowners forestry operations and reasonable subdivision and land use change.

- 6.5 Because of prohibited activity rule **5.4.5(c)**, and the exclusion of Matakana Island from the restricted discretionary activity provisions (5.4.2), production forestry within those areas identified by the Respondent would be uncertain and in jeopardy under PC 46. In fact no resource consent could be applied for under the Plan or Act given the prohibited activity status of production forestry. The submitter believe it would be too uncertain to leave this matter over to an interpretation through other processes such as applications for existing use rights under section 10 of the RMA. Existing use rights is the Respondents option to provide for a continuation of production forestry. Production forestry needs to be a permitted activity for greater certainty and interpretation because reliance on existing use rights will be a potential cost to be borne by the land owner should there be any doubt in the future.

Relief Sought

Ensure that production forestry is a permitted activity on the Matakana Island Forested Sand Barrier.

- 6.6 The exclusion of Matakana Island in **rule 5.4.2** unfairly limit the current use of the submitter's existing certificates of title. If the Respondent believes the activities currently available for all other rural areas (pursuant to 5.4.2), once a development is on the table, are not appropriate for Matakana Island, then these should be matters added to the assessment criteria in 5.6 so they can be considered as part of a land use and/or subdivision consent. In particular the management plan developed through a subdivision consent for the land can assess the appropriateness of these other activities and with regard to an amended assessment criteria in both sections 5 and 18 of the District Plan. The exclusions in PC 46 should have no application to the existing certificates of title.

Relief Sought

Remove the exclusions from 5.4.2 for the Matakana Island Forested Sand Barrier for existing titles, delete rule 5.4.3 and make any consequential amendments to assessment criteria for subdivision, use and development in the District Plan.

- 6.7 New **Rule 5.4.4** states that subdivision and development on Matakana Island is non-complying in the areas subject to significant ecological features. As it currently stands all certificates of title owned by TKCH contain what the Respondent consider a significant ecological feature notation. Therefore, and regardless of the enabling provisions in section 18 of the plan, the instance TKCH propose any form of subdivision (even a boundary adjustment) of its titles it could be captured by this non-complying activity rule. The rule should be replaced with a controlled activity subdivision rule with matters to be assessed relating to potential effects on ecological values.

- 6.8 Not only is subdivision non-complying, but so too is **development**. *Development* is defined in the District Plan (28 September 2013 District Plan) as:

"Development/Land Use Development" means any work that involves the disturbance and/or an excavation of the land surface and/or the provision of services for the purposes of compliance with Resource Consent approvals or as required to fulfill the obligations of a Permitted Activity, but excludes day to day farming activities such as fencing, cultivation, maintenance of farm tracks, and orchard activities such as shelter belt and tree removal and root ripping.

It also may include the land use development process which can incorporate a multitude of activities which can be social, residential, commercial or industrial in nature and can also include building and civil construction activities.

- 6.9 Coupled with Rule 5.4.4, the above definition creates a very restrictive planning regime for the Appellants land. The result of this could be to prevent consideration of dwellings in those areas. Dwellings and occupation (established under appropriate conditions and including information on enhancement opportunities) may actually be the trigger for an improvement in ecology. The rule should be deleted and replaced with a new controlled activity rule for dwellings and subdivision.

Relief Sought

Delete rule 5.4.4. Insert a new controlled activity rule (5.4.1A) and a new list of matters Council can reserve control over for the purposes of imposing conditions for ecological values in part 5.6.1. The new rule should cover dwellings, accessory buildings, associated development, and subdivision; Or

In the alternative

Insert new rules that provide for appropriate activities (subject to and appropriate assessment of ecological values), such as subdivision, land use and development.

- 6.10 **Rule 5.4.5** lists activities which are prohibited within areas Council considers to be Significant Ecological Areas. Included in the list are Places of Assembly, Accommodation Facilities and Production Forestry (not covered in RDA and DA rules 5.4.2 and 5.4.3). The forestry issues have been dealt with above. By their nature some accommodation facilities could be mutually beneficial in areas with ecological value (such as in eco – tourism or other such use). It would be more efficient and effects based if these types of activities had the ability to be tested on a merits basis through the resource consent process, particularly where these might be the 'trigger' for enhancements to occur.

Relief Sought

Remove 5.4.5 (a) – (b) from the list of prohibited activities and list these in 5.4.2 for the Matakana Island Forested Sand Barrier.

- 6.11 **Part 5.6.2** of the Proposed Plan Change contains an amended assessment criteria for activities considered to be a discretionary or non-complying activity. Although this section of the District Plan is largely related to the management of areas Council considers to be significant ecological areas, the proposed assessment criteria in 5.6.2 contains a number of provisions for assessing other matters. For example it asks for an assessment on aspects such as the strategies in the Matakana Island Plan through links to 18.5.8, Objective 10, and Policy 16. Many of those items have little or nothing to do with ecological values and therefore the matters for assessment need to be reworked.

Relief Sought

Amend 5.6.2 to matters only relating to ecology. Delete references to unrelated or subjective matters (such as the links to irrelevant parts of the objective and policies of the District Plan and those listed in 18.5.8).

Plan Change 46 – Landscape Provisions

- 6.12 Plan Change 46/Variation 2 contains planning **maps** showing areas of what the Respondent considers to be Outstanding Landscape Features and Landscapes through notations **S9, S9a and S25**. However the most recent landscape assessment completed by Isthmus Group Limited (dated August 2011) and for the Island study states:

"Matakana Island is not an outstanding landscape or natural feature itself, however parts of it are highly valued in particular for its Tangata Whenua, historical and ecological values" (see page 19 of the Isthmus assessment).

- 6.13 The study is more recent than earlier assessments that have been completed for the Island and is the only landscape report referenced in the Section 32 report and background documents. It is difficult to see how the Respondent can, without qualification, ignore the findings of the Isthmus Report and include Matakana Island in Appendix 2 as an Outstanding Landscape Feature. The submitter **opposes** the identification and scheduling of its land as an Outstanding Landscape Feature.

Relief Sought

Remove S9, S9a, and S25 from the Planning Maps, Schedule of Identified Outstanding Landscape Features and all parts of Section 6 of the District Plan (including any reference through Plan Change 46/Variation 2).

- 6.14 If any specific landscape provisions for Matakana Island are to remain, and based on those included in PC 46, then the following reasons and relief apply.
- 6.15 The Appellant **supports** rule **6.4.1.1(a)** that permits production forestry in areas shown as S9 and S25. This rule should also apply to area S9a. This rule should prevail over the natural environment rules.
- 6.16 The Appellant **opposes** the restrictions imposed on its land holdings through rules **6.4.1.2, 6.4.1.3**, the exclusions to the restricted discretionary activities in rule **6.4.3.1**

– **6.4.3.3**, and the new non-complying activity rule **6.4.5.1(a) – (c)**. The Appellant believes the landscape values in areas S9, S9a and S25 can be effectively maintained and enhanced through a new controlled activity rule for subdivision, built form (including dwellings) and standards on earthworks. The Appellants approach is consistent with the way that Council have dealt with landscape values and built form on Rangiwaea Island, but in a more sensitive and master planned manner.

Relief Sought

Delete rule 6.4.5.1 (a) – (c) and remove all restrictions and exclusions of the Matakana Island Forested Sand Barrier from section 6 of the District Plan (including 6.6.1.1(e)). Insert new controlled activity rules (6.4.2A) and a new list of matters Council can reserve control over for the purposes of imposing conditions for landscape values mentioned in part 6.6.2. The new rule should cover dwellings, accessory buildings, associated development, and subdivision. Standards should include appropriate matters such as height, reflectivity, types of glass, vegetation clearance, earthworks and servicing; or

In the alternative:

Insert new restricted discretionary activity rules. The new rules should provide for dwellings, accessory buildings, associated development, and subdivision. Matters such as height, reflectivity, types of glass, vegetation clearance, earthworks and servicing can be included in assessment criteria. The new restricted discretionary activity rules should be accompanied with non-notification clauses whereby applications under those rules need not be publicly notified and written approvals are not required from any party.

- 6.17 **Part 6.6.2** of the Proposed Plan Change contains assessment criteria for activities considered to be a discretionary or non-complying activity. Although this section of the District Plan is largely related to the management of areas the Respondent considers to be outstanding landscape features, the proposed assessment criteria contains a number of provisions for assessing other matters. For example it asks for an assessment on aspects such strategies in the Matakana Island Plan. These items have little or nothing to do with landscape value and therefore should be deleted.

Relief Sought

Amend 6.6.2 to matters only relating to landscape. Delete references to other unrelated or subjective matters (such as the Matakana Island Plan) not related to landscape values.

Plan Change 46 – Section 18

- 6.18 PC 46 introduces a new **explanatory statement** and **issue 10** for Matakana Island. Whilst it lists some of the cultural, ecological, and visual values of the Island, it fails to recognise the full history of in particular the Forested Sand Barrier. The explanation does not balance the various aspects of sustainable management of the land and the potential benefits for ecological values, landscape values, cultural values, and economic well being by integrating development with all these matters. The Appellant **opposes** the statement and issue number 10.

Relief Sought

Amend the explanatory statement and issue 10 to recognise a fuller history of the Island, including the ownership of the Forested Area, and the benefits of integrating development with the existing land use to achieve improvements for the various values on the Island. A balanced approach should allow adverse effects to be considered on an equal footing with potential benefits. A consistent approach to natural hazards needs to be taken with both Matakana and Rangiwaea Islands and for consistent administration.

- 6.19 The Proposed Plan Change introduces a new Objective for Matakana Island (**Objective 18.2.1.10**). The proposed objective is **opposed** because it is not clear what Council would like to achieve, probably because it is more an abstract statement, rather than something to be achieved under an RMA framework. If the bullet points in the objective are to remain then those items will need clear definition so decision makers and plan users know what is to be achieved. The Appellant seeks the objective is reworded.

Relief Sought

Amend objective 18.2.1.10 to read (or other with similar effect):

- 10 ~~*The following attributes which*~~ *To contribute to the social, ~~and~~ cultural, and economic well-being of the Matakana Island including its community ~~are~~ by maintaineding and supporteding:*
- ~~Unique way of life,~~
 - ~~Rich~~ *cultural values,*
 - ~~Sensitive~~ *The natural environment attributes, and*
 - ~~Significant~~ *landscape values; and*
 - *Subdivision, use and development that promotes economic well being and which can be integrated within the existing Island environment on the Forested Sand Barrier.*

- 6.20 The Plan Change contains a policy specifically directed towards Matakana Island (**policy 18.2.2.16**). The Appellant **opposes** the policy (**included any related policies relevant for the Island**) because it considers it does not provide objective guidance on how Council (or a decision maker) can assess development and activities on the Island.

Relief Sought

Amend policy 18.2.2.16 to read (or other with similar effect):

16. *In addition to policies relating to the rural land resource, subdivision, use and development of land on Matakana Island shall recognise and provide for the following matters:*
- (a) *Cultural, ~~spiritual and~~ archaeological values (including archaeology), including the need and desire of Maori to live on, develop and otherwise maintain a strong relationship with their ancestral land (on the 'Core' area of the Island)*

- (b) ~~Maintenance and enhancement of natural coastal character, natural features, ecological and landscapes values, indigenous vegetation and habitats of indigenous fauna, and historical heritage~~
- (c) ~~The need to ensure that large-scale or more intensive subdivision, use and development proposals do not compromise future options for the comprehensive planning land use and development of the Island.~~
- (d) ~~Legal access to the ocean beach, Panepane and sites of cultural significance for at least the local community and land owners as a result of subdivision, use and development on the Forested Sand Barrier.~~
- (e) ~~Sustainability of existing social infrastructure and the cultural and social well-being of the Matakana Island community.~~
- (f) ~~Sustainable economic development that contributes to the economic well-being of the Matakana Island community.~~
- (g) ~~Development that is of a scale and nature that will complement the lifestyle (including self-sufficiency) of the Matakana Island character areas community.~~
- (h) ~~Provide for the establishment of additional dwellings on the Matakana Island forested sand barrier in a clustered managed and master planned form ~~only~~.~~
- (i) ~~Manage subdivision, land use and development on the Matakana Island forested sand barrier under the rural provisions of the Plan to avoid fragmentation of existing titles.~~
- (j) ~~Enhancement of natural values on the Forested Sand Barrier through methods included in proposals for subdivision, use and development.~~
- (k) ~~Promotion of economic activity associated with subdivision, use, and development on the Forested Sand Barrier.~~

Or:

An alternative policy framework to provide a balanced framework to existing use and future use on Matakana Island.

6.21 Although the Appellant supports the amended Permitted Activity Rule 18.3.1 (d) which restores the ability to construct a dwelling on existing titles, PC 46 includes amendments to the other rural zone rules which have the effect of restricting use (see 18.3.2) of existing certificates of titles (or lots). For example rule 18.3.2(a) and (b) does not permit the construction of a minor dwelling on any existing lots owned by TKCH. Proposed rule 18.3.6(a) prohibits dwellings at a density of more than 1 dwelling per 40ha of land. The same principle issue of exclusions arise with the restricted discretionary activity rules (18.3.3), discretionary activity rules (18.3.4), the new non-complying activity (18.3.5), and the prohibited activities (18.3.6). The Appellant **opposes** all of the exclusions in those rules as they relate to the Matakana Island Forested Sand Barrier and the new rules that have a more restrictive effect than on other rural areas of the Western Bay of Plenty District. The opposition also relates to the standards and assessment criteria associated with those rules.

Relief Sought

Delete all exclusions to the rules and standards in section 18 of the Plan that restricts the use of the Appellants certificates of titles (over and above the provisions relating to other rural land in the district).

- 6.22 PC 46 has a framework for future subdivision on the Forested Sand Barrier. The intention to enable some form of subdivision and development is **supportable** in principle. The transferable development rights (**18.4.1(d)**) standards are also supportable in principle, but the words need reworking to ensure the administration of these achieves the intent.
- 6.23 The main aspect of the subdivision rule is contained in **18.3.3** with links to other specific standards. Essentially it provides for 1 dwelling/lot per 40ha of land area included in the subdivision on the submitters land. Density of dwellings/lots exceeding the density of 1 per 40ha of land defaults to a prohibited activity. The intent appears to provide for a subdivision as a restricted discretionary activity, although this is impacted by the other provisions in section 5 and 6 of the Proposed Plan Change as previously discussed. The rules also have design controls on subdivision whereby the lots shall be clustered. Each cluster shall have a minimum of 10 dwellings/lots, each lot is to have a maximum size of 1ha. These design aspects for the subdivision design and dwelling location are **opposed**.
- 6.24 The Appellant considers that the PC 46 approach to subdivision is overly rigid and will lead to an outcome more akin to an urban environment rather than an integrated rural result. To concentrate dwellings/lots in the proposed manner would likely require mass deforestation in the clustered areas, communal wastewater facilities, and a peri urban 'feel'. This is likely to be inconsistent with Change Number 2 to the Regional Policy Statement, and inconsistent with the character of the Island.
- 6.25 The Planning Maps attached to the Proposed Plan Change and other provisions in the District Plan relating to Matakana Island show an open coast natural hazard yard. The yard and planning map overlay is not consistent with the specific expert study by Economos (J Dahm) for the Island. It should be removed from the Planning Maps and specifically addressed by way of the subdivision rules rather than an arbitrary overlay on the planning maps.

Relief Sought

Amend the subdivision and land use rules for the Matakana Island Forested Sand Barrier to be a controlled activity where there is an average density of no greater than 1 dwelling/lot per 40ha of land in the subdivision.

In the alternative:

Amend the subdivision and land use rules for the Matakana Island Forested Sand Barrier to be a restricted discretionary activity where there is an average density of no greater than 1 dwelling/lot per 40ha of land in the subdivision. This rule should be accompanied with non-notification clauses whereby applications under the amended rules need not be publicly notified and written approvals are not required from any party;

And in both cases:

the rule should be accompanied by matters to be considered in the application including:

- *The appropriate location for the clusters of development having regard to the scale of areas included in the application. A balance title/lot shall be shown on the plan of subdivision including the location of the dwelling and accessory building areas within the balance lot;*
- *The location of proposed dwelling sites in the subdivision and the success of the design of the subdivision to integrate the dwelling sites with the forested areas. The location of dwelling sites shall also include curtilage management and controls/methods that integrate with coastal character considerations;*
- *The methods included in a management plan for the subdivision to maintain and enhance ecological, landscape, archaeological and cultural values. The management plan shall detail forestry management and tenure for all lots. The management plan shall detail appropriate tenure controls and education methods to be conveyed to new lot owners to recognise and provide for these matters. The management plan shall also identify the location, provision and appropriateness of any other built form for ancillary land use within the subdivision (such as proposed accommodation facilities, commercial facilities; education facilities).*
- *Appropriate ranges of allotment sizes to integrate the dwelling locations with the forested areas. The minimum lot size shall be 1ha;*
- *Minimisation of the risk to life and damage of property from natural hazards, including appropriate setbacks from the coast taking into account predicted climate change and potential earthworks requirements for minimum habitable building heights;*
- *The sustainability of water, wastewater, electricity, telecommunication provisions*
- *The provision of safe and efficient legal access for the subdivision.*
- *How the introduction of pest plants and animals will be minimised and managed.*
- *Methods for preventing further subdivision.*

Amend the subdivision rules for the Matakana Island Forested Sand Barrier to be a discretionary activity where there is an average density of more than 1 dwelling/lot per 40ha of land in the subdivision. Applications under this rule will consider the above criteria and, in addition, the matters referred to in objective 10 and policy 16.

7. In addition to the matters set out in part 6. above, the general reasons for the appeal are as follows:

7.1 The section 32 analysis that accompanied the Proposed Plan Changes were deficient and did not adequately consider the issues raised in the Appellant's submissions;

7.2 The decisions do not reflect the enabling framework set out in the Act;

7.3 The decisions are not consistent with the purpose and principles of the Act;

7.4 The decisions do not promote sound resource management practice.

Relief sought

8. The appellant seeks the following relief:

8.1 That the Proposed Plan Change is amended in accordance with the Appellant's submissions, further submissions, and relief sought in this notice of appeal;

8.2 Any similar or consequential relief; or in the alternative

8.3 Refusal of the Proposed Plan Change in its entirety;

8.4 Costs.

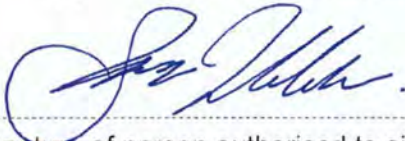
9. Documents attached to this notice

Copies of the following documents are attached to this notice of appeal.

(a) A copy of the appellant's submissions and further submissions (with a copy of the submission opposed or supported by the Appellants further submission).

(b) A copy of the Respondent's decision.

(c) A list of the names and addresses of persons to be served with a copy of this notice.



Signature of person authorised to sign
on behalf of the Appellants

30 May 2014

Date

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Annexures

- A A copy of the appellant's submissions and further submissions (with a copy of the submission opposed or supported by the appellants further submission).
- B A copy of the respondent's decisions.
- C A list of the names and addresses of persons to be served with a copy of this notice.

Advice to recipients of copy of notice of appeal

How to become a party to proceedings

You may be a party to the appeal if you made a submission or further submission on the matter of this appeal and you lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court within 15 working days after the period for lodging a notice of appeal ends.

Your right to be a party to the proceedings in the Court may be limited by the trade competition provisions in Section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing requirements (see form 38).

How to obtain copies of documents relating to appeal

The copy of this notice served on you does not attach copies of the appellant's submissions or the decisions appealed. These documents may be obtained, on request, from the appellant.

Advice

If you have any questions about this notice, contact the Environment Court Unit of the Department for Courts in Auckland, Wellington or Christchurch.

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