

# Variation 5 to Proposed Plan Change 66 (PC66)

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Variation 5 to Proposed Plan Change 66  
(PC66) to the Auckland Unitary Plan  
(Operative in part)

**SECTION 32; SECTION 77J and SECTION 77L  
EVALUATION REPORT**

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## Executive Summary

This combined s32, s77J and s77L report evaluates Variation 5 (VAR5) to Private Plan Change 66 (PC66) to the Auckland Unitary Plan (Operative in Part)(AUP). Variation 5 is required by Clause 34 of Schedule 12 of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. This report also considers whether there are any relevant qualifying matters under s77I, O or L and whether these matters result in a need to make the MDRS or density requirements under Policy 3 of the NPS-UD less enabling of development.

Variation 5 is recommended as the most appropriate means of achieving the implementation of policies 3 and 4 of the NPS-US and the MDRS within PC66. The higher density, Residential – Mixed Housing Urban Zone recommended for the northern portion of the land at 57 Schnapper Rock Road is reflective of there being no known restrictions to development of this part of the land. While, the qualifying matters identified under s77I, relating to the two streams and the significant ecological area located in the southern part of the land at 57 Schnapper Rock Road, and the recommended lower density zoning of this area (to Residential - Low Density Zone), is considered to be justified and appropriate.

## Section 1: Introduction

This report is prepared as part of the evaluation required by Section 32 and Sections 77J and 77L of the Resource Management Act 1991 ('the Act') for proposed Variation 5 (**VAR5**) to Plan Change 66 (**PC66**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).

## Section 32 Evaluation

Section 32 of the Act requires that before adopting any objective, policy, rule or other method, the Council shall carry out an evaluation to examine:

- The extent to which each objective is the most appropriate way to achieve the purpose of the Act, and
- Whether, having regard to their efficiency and effectiveness, the policies, rules or other methods are the most appropriate for achieving the objective.

The evaluation must also take into account:

- The benefits and costs of policies, rules, or other methods; and
- The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules or other methods.

## Section 77J Requirements

Section 77J Requirements in relation to an evaluation report requires that in addition to s32, the Council must consider, in relation to the proposed amendment to accommodate a qualifying matter the Council must:

- demonstrate why the Council considers:
  - that the area is subject to a qualifying matter; and
  - that the qualifying matter is incompatible with the level of development permitted by the Medium Density Residential Standards (**MDRS**) (as specified in Schedule 3A) or as provided for by policy 3 for that area; and
- assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
- assess the costs and broader impacts of imposing those limits.

Furthermore, the evaluation report must include, in relation to the provisions implementing the MDRS:

- a description of how the provisions of the district plan allow the same or a greater level of development than the MDRS;
- a description of how modifications to the MDRS as applied to the relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters and, in particular, how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas, including
  - any operative district plan spatial layers; and

- any new spatial layers proposed for the district plan.

The requirements above apply only in the area where Council is proposing to make an allowance for a qualifying matter.

The evaluation report may describe any modifications to the requirements of section 32 necessary to achieve the development objectives of the MDRS.

### Section 77L requirements

Section 77L sets out further requirements about the application of s771(j) being qualifying matters that makes higher density, as provided for by the MDRS or Policy 3 of the NPS-UD, inappropriate in an area. Section 77L states that a matter is not a qualifying matter under s771(j) unless the s32 evaluation report also:

- (a) *identifies the specific characteristic that makes the level of development provided by the MDRS (as specified in Schedule 3A or as provided for by policy 3) inappropriate in the area; and*
- (b) *justifies why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD; and*
- (c) *includes a site-specific analysis that—*
  - (i) *Identifies the site to which the matter relates; and*
  - (ii) *evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter; and*
  - (iii) *evaluates an appropriate range of options to achieve the greatest heights and densities permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 while managing the specific characteristics.*

### The evaluation approach

This part of the report outlines how Variation 5 has been evaluated. The rest of this report will follow the evaluation approach described in the table below. In accordance with section 32(6) of the RMA and for the purposes of this report:

- i. the ‘proposal’ means Variation 5; and
- ii. the ‘objectives’ means the purpose of MDRS and Variation 5.
- iii. The ‘provisions’ means PC66 as amended by Variation 5.

Sections of this report	Evaluation Approach
<b>Section 2: Issues and Objectives</b>	This part of the report will explain the resource management issues and why there is a need to resolve them. It will also outline the purpose of the MDRS and Variation 5.

<b>Section 3: The development and evaluation of options</b>	In accordance with sections 32(1)(b) and (2) and sections 77J and L of the RMA, this section examines whether the options appropriately achieve the objectives of the AUP, the MDRS and the sustainable management purpose of the RMA. The options are assessed by their efficiency and effectiveness, costs, benefits and risks to resolve the RMA issue.
<b>Section 4: Reasons for the proposed plan change</b>	In accordance with subsections 32(1)(a) and (1)(b)(iii) of the RMA, this part of the report examines the extent to which the objectives of the proposal (Variation 5) are the most appropriate way to achieve the purpose of the RMA. This section outlines the reasons for Variation 5 and the scope of Variation 5.
<b>Section 5: Statutory evaluation</b>	This part of the report evaluates the relevance of Variation 5 to Part 2 (sections 5-8) and other relevant parts / sections of the RMA.
<b>Section 6: National and local planning context</b>	This part of the report evaluates the relevance of Variation 5 against the national and local planning context.
<b>Section 7: Development of the plan change</b>	This part of the report outlines the methodology and development of Variation 5, including the information used and consultation undertaken in preparing Variation 5. This section includes a summary of all advice received from iwi authorities on Variation 5 (as required by section 32(4)(a) of the RMA).
<b>Section 8: Evaluation of provisions</b>	This part of the report outlines the evaluation conducted on individual issues contained within Variation 5.
<b>Section 9: Conclusion</b>	This part of the report concludes that Variation 5 is the most efficient, effective and appropriate means of addressing the resource management issues identified.

This section 32 evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received.

## Section 2: Issues and Objectives

1. The land at 57 Schnapper Rock Road, Schnapper Rock is subject to private plan change 66 (PC66) to rezone the land from Residential – Large Lot Zone to a combination of Residential - Mixed Housing Suburban Zone (1.88 hectares) and Residential – Single House Zone (2.11 hectares). PC66 also seeks that the Greenhithe Precinct be removed from the land at 57 and 57A Schnapper Rock Road. No changes to the wording of provisions in the zones is proposed.
2. The purpose of PC66 is to enable the development of additional housing (at between approximately 90 – 110 new dwellings) on the 57 Schnapper Rock Road portion of the land. This is based on an ‘Envisaged Development Concept Plan’ which was provided as part of the AEE material, and the density against which some of the environmental effects were assessed. Furthermore, the Applicant stated, in its request for this rezoning, that the Greenhithe Precinct (specifically Sub-precinct A) which was located over 57 and 57A Schnapper Rock Road, creates an additional layer of planning control over the land which does not justify such control because the land does not have any particular natural and landscape quality that demands protection by way of the Precinct controls.
- 3.. PC66 was publicly notified and was subsequently approved, without any changes, by independent hearing commissioners on 10 May 2022.
4. The Resource Management Act 1991 (“**the Act**”) was amended by the introduction of the Resource Management (Enabling Housing Supply and Other Matters Amendment Act) 2021 and came into effect on 21 December 2021, after the submission period for PC66 had ended but before a decision on PC66 had been made.
5. As required by s34 of Schedule 12, Part 5 of the Transitional, savings, and related provisions of the Act, if a plan change was notified before the commencement date of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, but the decisions on submissions had not been notified and the plan change had not been withdrawn and the MDRS were not incorporated through any proposed rules, then the Council must notify a variation to incorporate the MDRS as required by s77G(3) of the Act and give effect to policies 3 and 4 of the NPS-UD. Such a variation does not merge with the Council’s intensification planning instrument (**IPI**) but must be processed at the same time as the IPI, using the Intensification Streamlined Planning Process (**ISPP**).
6. Furthermore, in accordance with Policy 4 of the NPS-UD the Council may make the MDRS and the relevant building height or density requirements under Policy 3 of the NPS-UD less enabling of development in relation to an area within a relevant residential zone or urban non-residential zone but only to the extent necessary to accommodate one or more of the qualifying matters listed in 77I or 77O or a specified, site specific qualifying matter under s77L.
7. To give effect to the NPS-UD and the MDRS, PC66 requires variation and amendment to the PC66 approved Residential – Mixed Housing Suburban and Residential – Single House Zone land zoning sought on the 57 Schnapper Rock Road portion of the land. No zoning change is sought or required to the 57A Schnapper Rock Road portion of the

PC66 land. With the zoning of 57A Schnapper Rock Road to remain Residential – Large Lot Zone, which does not need to be considered under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

8. Furthermore, consideration is required of whether the existing significant ecological area and the two streams identified in the southern part of the land to be zoned Residential – Single House Zone under PC66 should be considered a qualifying matter and following this, whether a lesser density zoning (i.e. the Residential – Low Density Residential Zone) should be applied to all or part of the southern portion of the land.
9. Changes to zoning only require amendments to the zoning maps. No AUP text provisions are required to be amended.

## **Section 3: Development of Options**

### **Description of options**

1. The range of options available to the Council are limited due to the directive nature of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, the NPS-UD and MDRS. However, it is considered that the following four options best describe the range of actions open to Council. The following options were considered in the preparation of Variation 5.
2. Option 1 is the status quo or do nothing option. Under this option PC66 would not be varied and the requirements of the Resource Management (Enabling Housing Supply and Other Matters Amendment Act) 2021, NPS-UD and MDRS would not be met. As a result, PC66 could not likely be adopted by Council and the zoning over 57 Schnapper Rock Road would likely remain as Residential – Large Lot Zone and the Greenhithe Precinct would remain over both 57 and 57A Schnapper Rock Road.
3. Option 2 is to introduce Variation 5 as proposed. This would amend the zoning of the northern portion of 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone; and amend the zoning of the southern portion of the land to the Residential – Low Density Zone, in recognition of the qualifying matters under s771(a) (being the protection of rivers (including streams) and significant ecological areas under s6(a) of the Act). Noting that during the PC66 process the two streams on the land were identified as intermittent streams which flowed through the adjoining properties to the south-west and south-east. Albeit, with questions over whether the stream in south-eastern part of the land, which flows into the stream areas on the adjacent land at 55 Schnapper Rock Road was in fact an ephemeral stream; and whether this adjacent stream has been reclaimed as part of the subdivision of the site at 55 Schnapper Rock Road. No further evidence was provided during the PC66 process disputing the intermittent stream classification of either of the streams. Therefore, it is considered that a better level of protection from inappropriate subdivision, use and development, and likely lesser adverse effects, is provided by the less intensive Residential – Low Density Zone. Noting also that currently the land is zoned Residential – Large Lot Zone, so the Residential – Low Intensity Zone does allow for a level of development intensification over and above the existing situation, and this would be more appropriate for the site. Furthermore, the land adjacent



to the east at 55 Schnapper Rock Road is also likely to be rezoned Residential – Low Density Zone.

4. Option 3 is to propose a variation that rezones the whole of the land at 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone and relies on the provisions contained in Chapter E of the Auckland Unitary Plan (Operative in Part) i.e. E1 - E3 as they relate to streams and E15 Vegetation Management and biodiversity. However, the adverse effects from more intensive development that could occur in the southern portion of the land would likely be greater on the streams and significant ecological area which are recognised as matters of national importance.
5. Option 4 is to propose a variation that amends the zoning of the northern and south-eastern portion of 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone; and amend the zoning of the south-western portion of the land to the Residential – Low Density Zone, in recognition of the qualifying matters under s771(a) (being the protection of rivers (including the south-western stream) and significant ecological areas under s6(a) of the Act). As with Option 2, it is noted that during the PC66 process the two streams on the land were identified as intermittent streams which flowed through the adjoining properties to the south-west and south-east. Albeit, with questions over whether the stream in south-eastern part of the land, which flows into the stream areas on the adjacent land at 55 Schnapper Rock Road was in fact an ephemeral stream; and whether this adjacent stream has been reclaimed as part of the subdivision of the site at 55 Schnapper Rock Road. Noting that no further evidence was provided during the PC66 process disputing the intermittent stream classification of either of the streams. However, Option 4 would recognise that the identified stream may be ephemeral and linked to a reclaimed stream downstream (on 55 Schnapper Rock Road) and therefore this stream would not require protection and a more intensive land zoning, such as Residential – Mixed Housing Urban Zone could occur on the south-eastern portion of land, as well as the northern portion. Option 4, to rezone the south-western portion of 57 Schnapper Rock Road to Residential – Low Density Zone, would recognise that the south-western stream is an identified intermittent stream and that it is located within the identified significant ecological area; and both these features require protection from inappropriate subdivision and use under s6 of the Act. Also recognising that currently the land is zoned Residential – Large Lot Zone, so the Residential – Low Intensity Zone does allow for a level of development intensification over and above the existing situation, and this would be more appropriate for the site while also providing a better zone transition to the Residential – Large Lot Zone to the south-west.
6. The option of rezoning all of the land to the Residential – Low Density Zone was considered. However, this was not progressed as, while this option would ensure the streams and the significant ecological areas in the southern part of the site would be protected, as required by s6, and meeting the requirements for a qualifying matter under s771; this would not enable the density required by the MDRS in the northern part of the site, which is not subject to any qualifying matters.

## Evaluation of options

7. **Table 1** below describes the criteria used to evaluate the options; and provides an elevation of the options.

**Table 1**

	<b>Status Quo (do nothing)</b>	<b>Option 2 – VAR5</b>	<b>Option 3</b>	<b>Option 4</b>
		<p>Rezone northern part of 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone and rezone the southern part of 57 Schnapper Rock Road to Residential – Low Density Zone.</p> <p>(preferred option)</p>	<p>Rezone all of 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone.</p>	<p>Rezone northern and south-eastern part of 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone and rezone the south-western part of 57 Schnapper Rock Road (around the identified SEA and stream) to Residential – Low Density Zone.</p>
<b>Appropriateness</b>	<p>This option is not considered to be appropriate as it is contrary to the direction within the RMA to notify a variation.</p>	<p>This option is considered to be appropriate as it amends the zoning of land within PC66 to allow implementation of the MDRS while recognising that there are streams and a significant ecological area on the land which are protected under s6 of the Act and these areas should not be subject to the full extent of density required by the MDRS. Noting</p>	<p>This option is considered to be appropriate in respect of the implementation of the MDRS. However, it is considered that the implementation of the Residential – Mixed Housing Urban Zone over the southern portion of the site may not provide sufficient protection of the streams or significant ecological area from inappropriate subdivision and</p>	<p>This option is considered to be appropriate as it amends the zoning of land within PC66 to allow implementation of the MDRS while recognising that there is a stream and a significant ecological area on the land which are protected under s6 of the Act and these areas should not be subject to the</p>

		also, that the land is currently zoned Residential – Large Lot Zone, so the preferred Residential – Low Density Zone will still enable an increase in density over this part of the site.	development that could occur under the higher density allowances of the zone.	full extent of density required by the MDRS. Noting also, that the land is currently zoned Residential – Large Lot Zone, so the preferred Residential – Low Density Zone will still enable an increase in density over this part of the site.
<b>Effectiveness</b>	This option is not likely to be effective as PC66 is unlikely to be able to be adopted by the Council given it would not give effect to the MDRS, and therefore the zoning of the land would have to remain as Residential – Large Lot Zone with the Greenhithe Precinct also remaining over both 57 and 57A Schnapper Rock Road.	This option is likely to be effective in that it will give effect to the MDRS while better ensuring the protection of the streams and significant ecological area under s6 of the Act can be provided for.	This option will be effective in giving effect to the MDRS.  This option is likely to be less effective in providing sufficient protection of the streams or significant ecological area from inappropriate subdivision and development that could occur under the higher density allowances.	This option is likely to be effective in that it will give effect to the MDRS while better ensuring the protection of the stream and significant ecological area under s6 of the Act can be provided for.
<b>Efficiency</b>	This option would not be efficient as it would not enable more intensive residential development of the land.	This option is likely to be relatively efficient in the use of land as it incorporates the MDRS and provides for additional Residential – Mixed Housing	This option will result in the efficient use of land in accordance with the MDRS and would provide for additional Residential – Mixed Housing Urban zoned land	This option is likely to be relatively efficient in the use of land as it incorporates the MDRS and provides for additional Residential –

		<p>Urban zoned land in the northern part of the site, allowing for more intensive development over the part of the land that can accommodate it. While protecting streams and a significant ecological area in the southern part of the land, but enabling an appropriate level of residential development under the Residential – Low Density Zone to support the protection of these identified natural features.</p>	<p>which would enable additional development and density.</p> <p>This option may result in the inefficient protection of the streams and significant ecological area on the land as a result of higher density residential development.</p>	<p>Mixed Housing Urban zoned land in the northern and south-eastern parts of the site, allowing for more intensive development over the part of the land that can accommodate it. While protecting the identified stream and a significant ecological area in the south-western part of the land, but enabling an appropriate level of residential development under the Residential – Low Density Zone to support the protection of these identified natural features.</p>
<p><b>Costs</b></p>	<p>There are likely to be litigation and other costs associated with pursuing an option not provided for in the Act.</p> <p>The cost to the owners and developers of the land will be around delays in achieving certainty and the inability to</p>	<p>The amenity / environmental costs of this option will be commensurate with the costs imposed by the MDRS.</p> <p>The costs to land owners or developers will likely be reduced through reduced resource consent requirements and</p>	<p>The costs to land owners and developers will likely be reduced though reduced resource consent requirements and greater development opportunities.</p> <p>The environmental costs of this option may be greater as there is the potential for</p>	<p>The amenity / environmental costs of this option will be commensurate with the costs imposed by the MDRS.</p> <p>The costs to land owners or developers will likely be reduced through reduced</p>

	<p>develop the land as they seek to.</p> <p>There are unlikely to be any significant environmental or amenity costs compared to the existing situation.</p>	<p>greater development opportunities.</p> <p>These reductions will be more fully noticed in the land in the northern part of the site recommended to be zoned Residential – Mixed Housing Urban Zone.</p>	<p>greater adverse effects on the streams and significant ecological area on the land resulting from its more intensive development.</p>	<p>resource consent requirements and greater development opportunities.</p> <p>These reductions will be more fully noticed in the land in the northern and south-eastern parts of the site recommended to be zoned Residential – Mixed Housing Urban Zone.</p>
<b>Benefits</b>	<p>The benefits of this option are that PC66 would be unlikely to be adopted and the more intensive development of the land would not be enabled, and the significant ecological and stream features on the site would not be subject to potential adverse effects.</p>	<p>The incorporation of the MDRS will create the benefit of increased housing with fewer restrictions and resource consent costs.</p> <p>This option also has the benefit of better protecting the streams and significant ecological area in the southern part of the land.</p>	<p>The incorporation of the MDRS will create the benefits of increased housing with fewer restrictions and resource consent costs.</p> <p>However, this option could result in lesser environmental benefits as a result of the likely reduction in protection offered on the streams and significant ecological area on the land.</p>	<p>The incorporation of the MDRS will create the benefit of increased housing with fewer restrictions and resource consent costs.</p> <p>This option also has the benefit of better protecting the identified stream and significant ecological area in the south-western part of the land.</p>
<b>Risks</b>	<p>There are considerable legal risks with this option. The amendments to the Act require</p>	<p>The risks of not proceeding with this option are that the MDRS will not be appropriately applied to the land</p>	<p>The risks of not proceeding with this option are that the MDRS will not be appropriately applied to the land</p>	<p>The risks of not proceeding with this option are that the MDRS will not be appropriately</p>

	that the Council notifies a variation to give effect to the MDRS.	in accordance with the Act and identified matters of national importance may not be sufficiently protected.	in accordance with the Act and also that identified matters of national importance may not be sufficiently protected.	applied to the land in accordance with the Act and identified matters of national importance may not be sufficiently protected.
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8. In summary it is considered that Option 1, doing nothing, is not appropriate as this would not result in the implementation of the MDRS and carries considerable risk of litigation in respect of failure to implement the requirements of the RMA.
9. Option 3, rezoning all of 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone is not favoured. While this will effectively implement the MDRS it will likely reduce the protection afforded to the streams and significant ecological area located in the southern part of the land.
10. Option 4, rezoning the northern and south-eastern part of 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone would enable a zone that incorporates the MDRS however, it may not sufficiently reflect the watercourse in the south-eastern part of the land, if this was, on further evidence, found to be an intermittent stream. Option 4 to rezone the south-western part of 57 Schnapper Rock Road to Residential – Low Density Zone, around the identified intermittent stream and significant ecological area, would restrict the density of development in this part of the land in recognition of the features that require protection under s6. Noting again that currently the land is zoned Residential – Large Lot Zone, so the Residential – Low Intensity Zone does allow for a level of development intensification over and above the existing situation, and this would be appropriate for the site while also providing a better zone transition to the Residential – Large Lot Zone to the south-west.
11. The preferred option is a variation to PC66 that amends the plan change and enables a zone that incorporates the MDRS to the appropriate level over the northern part of the site which is not affected by any matters of national importance or qualifying matters; and that enables development, but restricts the density of that development, over the southern part of the site which contains two identified streams (noting that no information has been provided to refute the intermittent stream classification of the south-eastern stream) and a significant ecological area which are identified as s6 and qualifying matters. Furthermore, noting that the land is currently zoned Residential – Large Lot Zone, so the Residential – Low Intensity Zone does allow for a level of development intensification over and above the existing situation, and this would be appropriate for the site while also providing a better zone transition to the Residential – Large Lot Zone to the south-west and the likely Residential – Low Density Zone to the south-east.

## Section 5: Reasons for the proposed variation

1. Variation 5 seeks to amend PC66 as follows:
  - (a) Amend the zoning of the northern portion of 57 Schnapper Rock Road to Residential – Mixed Housing Urban Zone; and
  - (b) Amend the zoning of the southern portion of 57 Schnapper Rock Road to the Residential – Low Density Zone, in recognition of the qualifying matters under s77I(a), being the protection of rivers (including streams) and significant ecological areas under s6(a) of the Act.
2. The reasons for Variation 5 relate to the requirement of the RMA, as amended by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, to notify a variation to give effect to policies 3 and 4 of the NPS-UD and incorporate the MDRS in the PC66 zoning. As noted in the options assessment above, proposed Variation 5 does this, but with recognition given to the presence of two streams and a significant ecological area in the southern portion of the land, which are considered to be qualifying matters under s77L of the Act.
3. As the purpose of Variation 5 to PC66 is to implement Policies 3 and 4 of the NPS-UD and the MDRS any other changes to PC66 not achieving that purpose are likely to be out of scope.

## Section 6: Statutory Evaluation under the RMA

1. Variation 5 to PC66 is a requirement of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Clause 34 of Schedule 12 of the Act states that:

**34 Status of partly completed proposed plan changes modifying relevant residential zone**

- (1) *This clause applies to any plan change that is proposing or requesting changes to a relevant residential zone or a new residential zone if—*
  - (a) *the plan change has been notified by a specified territorial authority before the commencement date, but decisions on submissions on that plan change have not been notified in accordance with clause 10 of Schedule 1 before that date; and*
  - (b) *the plan change has not been withdrawn; and*
  - (c) *the MDRS is not already being incorporated through any proposed rules.*
- (2) *The specified territorial authority must notify a variation to the plan change at the same time that it notifies the IPI to incorporate the MDRS as required by section 77G(3).*
- (3) *However, the variation does not merge with the specified territorial authority's IPI but must be processed at the same time as the IPI, using the ISPP.*

- (4) *The variation must incorporate the MDRS into all areas within the scope of the plan change that are a relevant residential zone or a new residential zone.*
- (5) *The variation may only include those uses referred to in section 80G(1)(b).*
- (6) *The variation may be declined or withdrawn only if it is no longer required for the plan change to meet the requirements of section 77G(1).*
- (7) *The variation must use the ISPP to incorporate the MDRS.*
- (8) *For the avoidance of doubt,—*
  - (a) *section 86B does not apply to any rules notified in the variation:*
  - (b) *this clause applies only in relation to the district of a specified territorial authority.*

**77J Requirements in relation to evaluation report**

- (1) *This section applies if a territorial authority is amending its district plan (as provided for in section 77G).*
- (2) *The evaluation report from the specified territorial authority referred to in section 32 must, in addition to the matters in that section, consider the matters in subsections (3) and (4).*
- (3) *The evaluation report must, in relation to the proposed amendment to accommodate a qualifying matter,—*
  - (a) *demonstrate why the territorial authority considers—*
    - (i) *that the area is subject to a qualifying matter; and*
    - (ii) *that the qualifying matter is incompatible with the level of development permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 for that area; and*
  - (b) *assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and*
  - (c) *assess the costs and broader impacts of imposing those limits.*
- (4) *The evaluation report must include, in relation to the provisions implementing the MDRS,—*
  - (a) *a description of how the provisions of the district plan allow the same or a greater level of development than the MDRS:*
  - (b) *a description of how modifications to the MDRS as applied to the relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters and, in particular,*



*how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas, including—*

*(i) any operative district plan spatial layers; and*

*(ii) any new spatial layers proposed for the district plan.*

*(5) The requirements set out in subsection (3)(a) apply only in the area for which the territorial authority is proposing to make an allowance for a qualifying matter.*

*(6) The evaluation report may for the purposes of subsection (4) describe any modifications to the requirements of section 32 necessary to achieve the development objectives of the MDRS*

2. Submissions on PC66 had closed before the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 came into effect on 21 December 2021. However, a hearing had not been held and a decision on PC66 had not been made. Therefore, PC66 meets the requirements of clause 34 and a variation must be prepared and notified accordingly. As also specified in clause 34(7), the process that Variation 5 to PC66 must go through is to use the Intensification Streamlined Planning Process (**ISPP**) at the same time as the Council's intensification planning instrument (**IPI**) which will introduce the MDRS into the AUP.
3. As outlined in section 1 above, sections 77J of the Act requires the s32 report to demonstrate why the Council considers that an area is subject to a qualifying matter; that the qualifying matter is compatible with the level of development permitted by the MDRS or provided for by Policy 3 for the area; and assess the impact that limiting development capacity, building height or density will have on the provision of development capacity and assess the costs and broader impacts of imposing the limits. Furthermore, section 77L requires the s32 report to identify the specific characteristic and justify why that characteristic makes that level of development inappropriate given the national importance of urban development.
4. As outlined elsewhere in this s32 report the northern portion of 57 Schnapper Rock Road is not subject to any development restrictions or identified qualifying matters. Therefore, rezoning this part of the land to Residential – Mixed Housing Urban Zone is considered to be the best option to provide for development capacity and meet the MDRS requirements.
5. During the PC66 process two streams were identified on the southern part of the at 57 Schnapper Rock Road. These were classified as intermittent streams which flowed through the adjoining properties to the south-west and south-east. Questions were raised over whether the stream in south-eastern part of the land, which flows into the stream areas on the adjacent land at 55 Schnapper Rock Road, was in fact an ephemeral stream; and whether this adjacent stream has been reclaimed as part of the subdivision of the site at 55 Schnapper Rock Road. However, no further evidence was provided during the PC66 process disputing the intermittent stream classification of either of the streams on the southern part of 57 Schnapper Rock Road.

6. Furthermore, a significant ecological area was also identified and confirmed as being located in the southern part of 57 Schnapper Rock Road, and being worthy of protection, during the PC66 process.
7. The preservation of the natural character of rivers (including streams) and the protection of them from inappropriate subdivision, use and development is a matter of national importance identified in s6(a) of the Act. In addition, the protection of significant ecological areas is a matter of national importance identified in s6(c) of the Act. Both of these matters are considered to be qualifying matters under s771(a) and both of these features have been identified and confirmed as present in the southern part of the land at 57 Schnapper Rock Road.
8. As a result, it is considered that the presence of these qualifying matters on the southern portion of the land at 57 Schnapper Rock Road makes a higher level of development inappropriate in this part of the site. Therefore, it is recommended that the Residential – Low Density Zone be applied over this part of the land.
9. It is further noted that the Residential – Low Density Zone still enables more development capacity and density than the existing Residential - Large Lot Zone that would apply without PC66 or any variation.
10. Table 2 below, outlines the relevance of Variation 5 to PC66 to sections 5, 6, 7, 8 of the Act.

**Table 2**

<b>RMA 1991</b>	<b>Relevant section</b>	<b>Relevance to VAR5</b>
S5 Purpose	All	VAR5 will assist people to provide additional housing while protecting identified matters of national importance such as streams and significant ecological areas; and maintain a level of residential amenity, as set out in the Act.
S6 Matters of national importance	<p>(a) <i>the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:</i></p> <p>(c) <i>the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:</i></p>	VAR5 gives effect to s6(a) by protecting identified streams from inappropriate subdivision, use and development; and to s6(c) by protecting an identified significant ecological area.
S7 Other matters	(b) <i>the efficient use and development of natural and physical resources:</i>	VAR5 supports the efficient use of land and residential amenity as provided in the MDRS; and also maintains the finite characteristics, quality of the environment

	<p>(c) <i>the maintenance and enhancement of amenity values:</i></p> <p>(f) <i>maintenance and enhancement of the quality of the environment:</i></p> <p>(g) <i>any finite characteristics of natural and physical resources:</i></p>	and amenity as far as possible where that quality and amenity is provided by natural features such as a the streams and significant ecological area.
S8 Treaty of Waitangi	All	TBC

11. It is considered that overall Variation 5 to PC66 is consistent with Part 2 of the Act as it recognises matters of national importance as qualifying matters where relevant and incorporates the necessary MDRS zoning changes.

## Section 7: National and Regional Planning Context

1. Variation 5 to PC66 has been assessed in respect of the following national and regional planning documents.

### **National Policy Statements**

#### National Policy Statement on Urban Development 2020 (NPS-UD)

2. The NPSUD provides national direction on urban development. Of particular relevance are policies 3 and 4 which require Councils to enable prescribed levels of development throughout the city, by which MDRS is a means of implementing the policies, subject to the identification of qualifying matters under ss77I, O or L which may result in MDRS building height or density requirements being less enabling.
3. It is considered that aligning the zoning of PC66 with the MDRS is consistent with giving effect to the NPS-UD.

#### National Policy Statement for Freshwater Management 2020 (NPS-FM)

4. The National Policy for Freshwater Management 2020 (**NPS-FM**) is relevant to Variation 5 and PPC66 because of the two streams located in the south-west and south-east portions of the plan change area, which discharge to the Te Wharau Creek.
5. The NPS-FM requires that natural and physical resources are managed in a way that prioritises the health and well-being of water bodies and freshwater ecosystems, the health needs of people, and the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
6. Variation 5, preferred Option 2 being the rezoning to Residential – Mixed Housing Urban Zone in the northern part of the land at 57 Schnapper Rock Road and rezoning to the Residential – Low Density Zone in the southern part of the land, is able to give effect to the NPS-FM as the higher density zoning is reflective of there being no watercourses or impediments to development in that part of the land; while the lower density zoning is proposed in order to recognise and protect the two streams and the ecology of the significant ecological area in the southern portion of the land.

7. No other National Policy Statements are relevant to the consideration of Variation 5.

### **Other Acts**

8. The Hauraki Gulf Marine Park Act and the Waitakere Ranges Heritage Area Act are not relevant to the consideration of Variation 5.

### **Regional Documents**

#### Auckland Plan

9. It is considered that Variation 5 is consistent with the Auckland Plan. In respect of providing for housing the plan contains directions to develop a quality compact urban form to accommodate Auckland's growth and accelerate the construction of homes that meet Aucklanders changing needs and preferences.

#### Auckland Regional Policy Statement (RPS)

10. The relevant objectives and policies of the RPS are set out and assessed in Table 3 below.

**Table 3:**

<b>RPS Chapter</b>	<b>Relevant objective/policy</b>	<b>Relevance to Variation 5</b>
<b>B2. Tāhuhu whakaruruhau ā-taone - Urban growth and form</b>	Objective B2.2.1(1) A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and economic growth; (c) better use of existing infrastructure and efficient provision of new infrastructure; (d) improved and more effective public transport; (e) greater social and cultural vitality; (f) better maintenance of rural character and rural productivity; and (g) reduced adverse environmental effects.	A more compact urban form will be enabled at higher residential densities as required by the MDRS.
	Objective B2.2.1(2) Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).	Variation 5 enables residential growth within the urban area.
	Objective B2.2.1(3) Sufficient development capacity and land supply is provided to accommodate residential,	Variation 5 will provide for the more efficient use of the existing urban land resource.

	commercial, industrial growth and social facilities to support growth.	
	Policy B2.2.2 (4) (4) Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, and avoid urbanisation outside these areas.	Variation 5 enables residential growth within the urban area.
	Objective B2.3.1 A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.	Variation 5 rezones to land to the highest possible intensity to give effect the MDRS while recognising the physical characteristics of the two streams and significant ecological areas and the protection that these require.
	Objective B2.4.1(1) Residential intensification supports a quality compact urban form.	A more compact urban form will be enabled at higher residential densities as required by the MDRS.
	Objective B2.4.1(2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area.	Development will be enabled in keeping with the MDRS.
	Objective B2.4.1(4) An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population.	Variation 5 will provide more efficient use of the existing urban land resource.
	Policy B2.4.2(1) Provide a range of residential zones that enable different housing types and intensity that are	Variation 5 suggests a range of residential zones across the land which will enable different housing types and

	appropriate to the residential character of the area.	intensity that reflect the characteristics of the land.
	Policy B2.4.2(3) Provide for medium residential intensities in area that are within moderate walking distance to centres, public transport, social facilities and open space.	Variation 5 suggests rezoning land to a higher intensity where it is closest to centres, transport, social facilities and open space options.
	<p>Policy B2.4.2(4) Provide for lower residential intensity in areas:</p> <p>(a) that are not close to centres and public transport;</p> <p>(b) that are subject to high environmental constraints;</p> <p>(c) where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; and</p> <p>(d) where there is a suburban area with an existing neighbourhood character.</p>	Variation 5 suggests a lower intensity zoning for the part of the land that is subject to environmental constraints and/or which has been scheduled in the AUP in relation to natural resources.
	<p>Policy B2.4.2(5) Avoid intensification in areas:</p> <p>(a) where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character; or</p> <p>(b) that are subject to significant natural hazard risks;</p> <p>where such intensification is inconsistent with the protection of the scheduled natural or physical resources or with the avoidance or mitigation of the natural hazard risks.</p>	Variation 5 suggests a lower intensity zoning for the part of the land that is subject to environmental constraints and/or which has been scheduled in the AUP in relation to natural resources.
	Policy B2.4.2(6) Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification	The application of the MDRS will increase the demand for infrastructure.

	<p>Policy B2.4.2(11) Enable a sufficient supply and diverse range of dwelling types and sizes that meet the housing needs of people and communities, including:</p> <p>(a) households on low to moderate incomes; and</p> <p>(b) people with special housing requirements.</p>	<p>The implementation the MDRS will enable an increase in the supply of housing.</p>
<b>B7. Toitū te whenua, toitū te taiao – Natural resources</b>	<p>B.7.2.1(1) Areas of significant indigenous biodiversity value in terrestrial, freshwater, and coastal marine areas are protected from the adverse effects of subdivision use and development.</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that is subject to an identified significant ecological area and two streams.</p>
	<p>B7.2.1(2) Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that is subject to an identified significant ecological area and two streams.</p>
	<p>B7.3.1(2) Loss of freshwater systems is minimised.</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that contains two streams in order to minimise the potential for the loss of freshwater systems.</p>
	<p>B7.3.1(3) The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that contains two streams in order to minimise the potential for adverse effects resulting from changes in land use.</p>
	<p>Policy 7.3.2(1) Integrate the management of subdivision, use and development and freshwater systems by undertaking all of the following:</p> <p>(a) ensuring water supply, stormwater and wastewater infrastructure is adequately provided for in areas of new growth or intensification;</p> <p>(b) ensuring catchment management plans form part of the structure planning process;</p> <p>(c) controlling the use of land and discharges to minimise the adverse effects of runoff on freshwater systems and progressively reduce</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that contains two streams in order to minimise the potential for adverse effects on freshwater resulting from changes in land use.</p>

	<p>existing adverse effects where those systems or water are degraded; and</p> <p>(d) avoiding development where it will significantly increase adverse effects on freshwater systems, unless these adverse effects can be adequately mitigated.</p>	
	<p>Objective B7.4.1(5) The adverse effects from changes in or intensification of land use on coastal water and freshwater quality are avoided, remedied or mitigated.</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that contains two streams in order to minimise the potential for adverse effects on freshwater resulting from changes in land use.</p>
	<p>Policy B7.4.2(1) Integrate the management of subdivision, use, development and coastal water and freshwater, by:</p> <p>(a) ensuring water supply, stormwater and wastewater infrastructure is adequately provided for in areas of growth; and</p> <p>(b) requiring catchment management planning as part of structure planning;</p> <p>(c) controlling the use of land and discharges to minimise the adverse effects of runoff on water and progressively reduce existing adverse effects where those water are degraded; and</p> <p>(d) avoiding development where it will significantly increase adverse effects on water, unless these adverse effects can be adequately mitigated.</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that contains two streams in order to minimise the potential for adverse effects on freshwater resulting from changes in land use.</p>
<p><b>B10. Ngā tūpono ki te taiao - Environmental risk</b></p>	<p>Objective B10.2.1(5) The functions of natural systems, including floodplains, are protected from inappropriate subdivision, use and development.</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that contains two streams in order to minimise the potential for adverse effects on freshwater resulting from changes in land use.</p>
	<p>Objective B10.2.1(6) The conveyance function of overland flow paths is maintained.</p>	<p>Variation 5 suggests a lower intensity zoning for the part of the land that contains two streams in order to minimise the potential for adverse effects on</p>



		freshwater resulting from changes in land use.
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## Section 8: Development of Variation

### Methodology

1. This methodology section is about how Variation 5 was developed. As noted in the discussion above Variation 5 is a direct requirement of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 and the requirement to incorporate the MDRS. As PC66 has just recently been heard and decided, the approach taken in developing this variation is to do what is necessary to implement the MDRS and no more.
2. This has involved reviewing PC66 and making decisions on whether and how zoning should be amended; and to identify if there are any qualifying matters applicable that would limit the density of development on the land subject to PC66.
3. Two qualifying matters under s771 were identified as relevant to the consideration of what zoning should be applied to the land. These are to give effect to s6(a) and (e) matters and protect the two streams and the identified ecological area located in the southern part of the land at 57 Schnapper Rock Road.

### Information Used

1. Table 4 below lists the reports, documents, evidence, plan versions et al that have been used to assist with the development of Variation 5 to PC66.

**Table 4:**

Name of document, report, plan	How did it inform the development of Variation 5
Stormwater Management Report, 57 & 57A Schnapper Rock Road, Schnapper Rock, prepared by Maven, Revision C, dated 31 May 2021.	Provided information of location of streams and overland flow paths on the land.
Assessment of Ecological Effects for a Plan Change Application at 57 & 57A Schnapper Rock Road, Schnapper Rock, prepared by Wildlands, dated February 2021.	Provided information of location and type of streams and the location and extent of significant ecological areas and the type of plant and animal species present or likely present on the land.

## Section 9: Evaluation of provisions

1. As noted above Variation 5 has been developed in response to the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. To this end Variation 5 does not aim to achieve any other purpose.
2. The main components of the variation relate to changes to zoning as shown on planning maps. No AUP text changes are required.
3. More specifically:

- (a) Amendments to zoning to the highest density zone where there are no restrictions on development or any qualifying matters. In particular, the higher density, Residential – Mixed Housing Urban Zone is recommended for the northern portion of the land at 57 Schnapper Roack Road as this is reflective of there being no known restrictions to development of the land.
  - (b) Amendments to zoning to the highest possible density when there are qualifying matters identified under s771. In particular, it is considered that there are two qualifying matters relating to the two streams and the significant ecological area in the southern part of the land at 57 Schnapper Rock Road, and as a result a lower density zoning of this area is recommended (i.e. to Residential -Low Density Zone). Noting that this zoning would still enable more development than the existing Residential – Large Lot Zone that is applicable to this part of the land.
4. Overall, it is considered that this level of change is necessary to implement the MDRS and to protect section 6 features such as streams and the significant ecological area from inappropriate subdivision, use and development.

## Consultation

1. In accordance with clause 3 of Schedule 1 of the Act, during the preparation of a proposed policy statement or plan, the local authority shall consult:
  - (a) *the Minister for the Environment; and*
  - (b) *those other Minister of the Crown who may be affected by the policy statement or plan; and*
  - (c) *local authorities who may be so affected; and*
  - (d) *the tangata whenua of the area who may be so affected, through iwi authorities; and*
  - (e) *any customary marine title group in the area.*

A local authority may consult anyone else during the preparation of a proposed policy statement or plan.

2. No community consultation has been specifically undertaken with regard to Variation 5.
3. For Variation 5 consultation with Mana whenua / iwi authorities is being undertaken in accordance with clauses 3B and 4A of Schedule 1 and s32(4A).
4. No other disciplines were consulted as Variation 5 is not considered to raise any specific technical matters.

## Section 10: Conclusion

Overall, it is concluded that Variation 5 is the most appropriate means of achieving the implementation of policies 3 and 4 and the MDRS within PC66. The higher density, Residential – Mixed Housing Urban Zone recommended for the northern portion of the land at 57 Schnapper Roack Road is reflective of there being no known restrictions to development of the land. While it is considered that following evaluation, the qualifying matters relating to the two streams and the significant ecological area in the southern part of the land at 57

Schnapper Rock Road, and the lower density zoning of this area (to Residential - Low Density Zone) as recommended, is justified and appropriate.

### List of Attachments

Attachment	Name of Attachment
A1	Option 1 – Zoning Map
A2	Option 2 - Zoning Map
A3	Option 3 – Zoning Map
A4	Option 4 – Zoning Map

**Attachment A1 - Option 1 – Zoning Map**

# Option 1

Oakway drive

Schnapper Rock Road

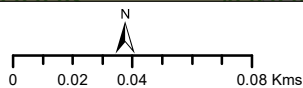
**Significant Ecological Areas Overlay**



**Streams**



**Residential - Large Lot Zone**



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Date: 1/08/2022

## Variation 5 to PPC 66 57-57A Schnapper Rock Rd



*Plans and Places*

**Attachment A2 - Option 2 – Zoning Map**

# Option 2

Oakway drive

Schnapper Rock Road

### Significant Ecological Areas Overlay




### Streams

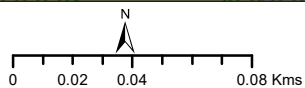


### Zones

 Residential - Mixed Housing Urban Zone

 Residential - Large Lot Zone

 Residential - Low Density Residential Zone



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Date: 29/07/2022

## Variation 5 to PPC 66 57-57A Schnapper Rock Rd

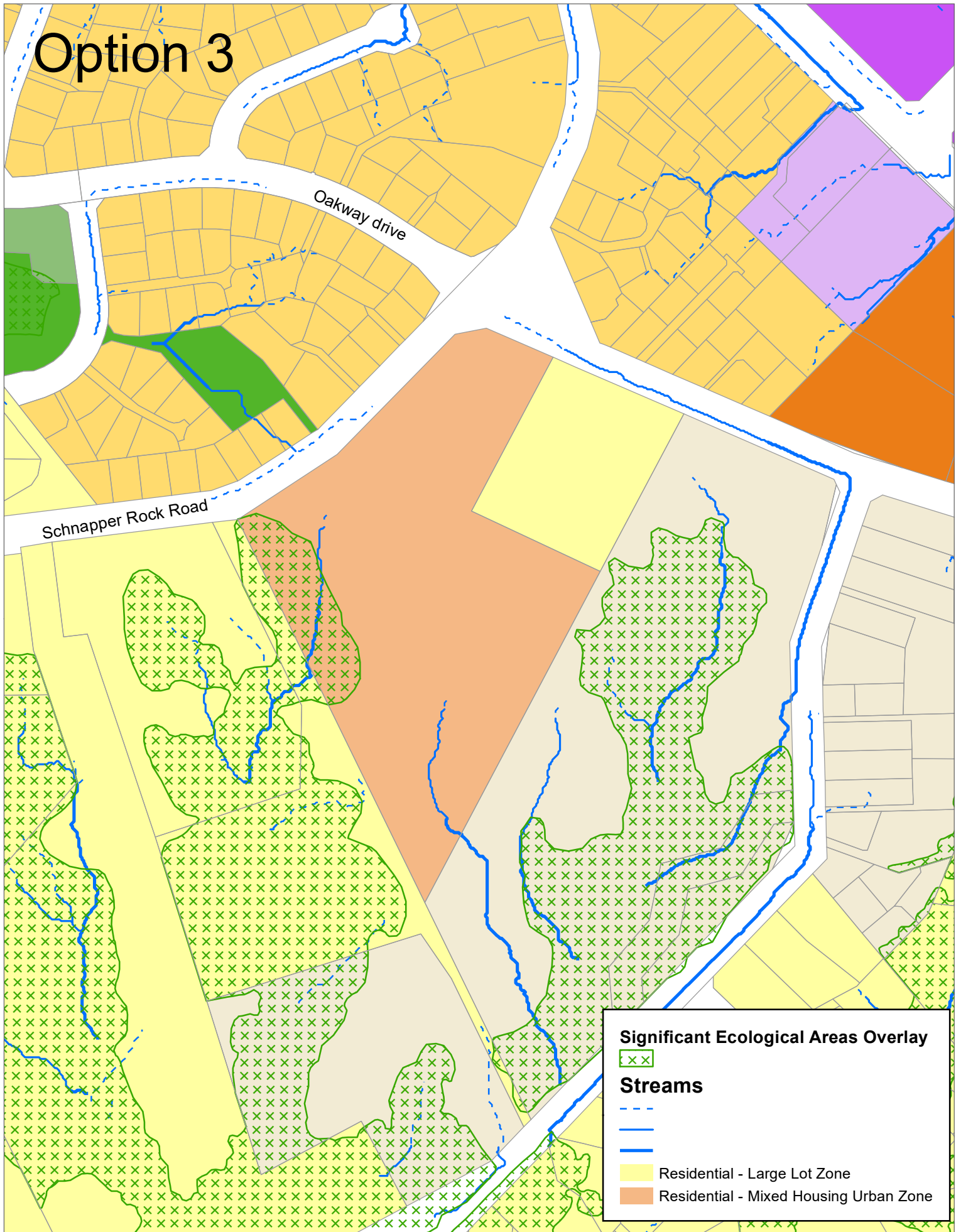


Plans and Places

**Attachment A3 - Option 3 – Zoning Map**



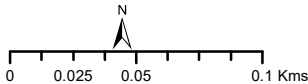
# Option 3



**Significant Ecological Areas Overlay**  
x x x

**Streams**  
- - -  
— — —

Residential - Large Lot Zone  
Residential - Mixed Housing Urban Zone



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Date: 1/08/2022

## Variation 5 to PPC 66 57-57A Schnapper Rock Rd



Plans and Places

**Attachment A4 - Option 4 – Zoning Map**

# Option 4

Oakway drive

Schnapper Rock Road

### Significant Ecological Areas Overlay



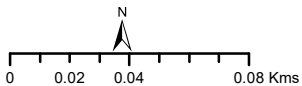
### Streams



Residential - Low Density Residential Zone

Residential - Large Lot Zone

Residential - Mixed Housing Urban Zone



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Date: 1/08/2022

## Variation 5 to PPC 66 57-57A Schnapper Rock Rd



Plans and Places