

Planning & Strategy Committee
30 July 2020

Report for Agenda Item | Rīpoata moto e Rāraki take 2

Department: Planning & Development

Title | Taitara: Proposed rezoning of part of 296 Glenorchy – Queenstown Road Sunshine Bay from Rural to Medium Density Residential

PURPOSE OF THE REPORT | TE TAKE MŌ TE PŪRONGO

- 1 The purpose of this report is to request that the Planning and Strategy Committee agree in principle to the rezoning of part of Lot 1 DP 397058, which abuts the Sunshine Bay residential area, from Rural to an urban residential zone – most likely Medium Density Residential, and approve the preparation of a variation to the Proposed District Plan for this purpose.

EXECUTIVE SUMMARY | WHAKARĀPOPOTOTANGA MATUA

- 2 A landowner (Mr Steve Xin) has requested that Council consider re-zoning approximately 5ha of a site at 296 Glenorchy – Queenstown Road abutting the Sunshine Bay urban area, from Rural to an urban residential zone (Medium Density Residential (**MDR**) being the nearest approximate zone to the intended form of development) and to extend the urban growth boundary (**UGB**) around the urban zoned part of the site.
- 3 This request from the landowner has come about partly as the result of the settling of a Stage 1 appeal (Consent Order 23 September 2019), which removed the Outstanding Natural Landscape (**ONL**) classification from the majority of the site, removing a barrier to urban development.
- 4 The landowner has commissioned the preparation of initial development concepts and a suite of expert analysis reports supporting the re-zoning the site. This includes an ecological assessment, ecological mitigation and offsetting options, geotechnical and hazard assessment, geotechnical review of the rockfall hazard assessment, an infrastructure report, and a transportation and access report. An initial high-level visual/landscape assessment and initial consultation with local Iwi (Aukaha and Te Ao Marama) have also been undertaken. These reports identify no significant issues with urban development generally, suggesting that consideration of the site for urban development can proceed to a more detailed assessment.
- 5 The landowner has put forward two options for re-zoning. Option 1 would be a change to the zoning (a mapping variation) without any change to the rules and standards for the zone, with the use of building restriction areas and a Visitor Accommodation Sub-Zone overlay over parts of the site. Option 2 would be a more comprehensive variation,

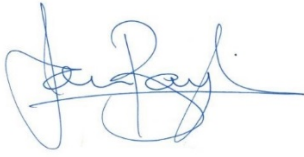
including a change to the zoning and the incorporation of a structure plan for the site into the PDP with associated site-specific rules and standards.

- 6 The options will be considered in detail in a section 32 evaluation. This assessment will include additional information provided by the landowner on landscape and cultural effects, including further consultation with local Iwi (Aukaha and Te Ao Marama) or a cultural impact study. Officers will require peer reviews of these reports if deemed necessary.
- 7 The rezoning of the site would contribute to the supply of land and would enable the development of medium density housing close to the town centre. The developer is proposing to contribute 5% of the yield of the development to the Queenstown Lakes Community Housing Trust (**QLCHT**), to be secured through a separate legal agreement (Stakeholder Deed).
- 8 The site has a steep slope and other constraints, which makes development of terrace housing or apartments at higher densities more feasible than larger detached housing. The site therefore has the potential to introduce a variety of typologies to the current housing stock.

RECOMMENDATION | NGĀ TŪTOHUNGA

- 9 That the Planning & Strategy Committee:
 1. **Note** the contents of this report.
 2. **Agree in principle, subject to further work, that** rezoning of the non-Outstanding Natural Landscape part of the site to an urban residential zone is appropriate for recommending to Council as a variation to be notified as part of the Operative District Plan review.
 3. **Authorise** the Manager Planning Policy to make edits and changes to the plan maps and provisions, to prepare a section 32 evaluation report and to complete steps required to prepare and consult on a future variation to the Proposed District Plan.
 4. **Note** that further consultation with Iwi authorities will occur prior to any decision on notifying this variation and advice received may prompt changes to be made to the proposal.
 5. **Note** that agreeing in principle to the above does not mean Council has formed a view on the specific detail of a variation on these matters, on resource consent applications relating to these matters, or on other related decisions on the Proposed District Plan.

Prepared by:



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15/07/2020

Reviewed and Authorised by:



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General Manager, Planning & Development
17/07/2020

CONTEXT | HOROPAKI

- 10 **Stages:** The Queenstown Lakes District Council Operative District Plan (the **ODP**) is being reviewed in stages. At this point the reviewed part of the ODP (referred to as the **PDP**) contains new and revised provisions within 44 new chapters that apply to 99.8% of the land in the district. The zoning for the subject site was reviewed as part of Stage 1 with decisions on submissions issued in May 2018.
- 11 Under the Resource Management Act 1991 (the **RMA**), until the appeals have been adequately resolved and the PDP is made operative, or operative in part by the Council, a landowner can not apply for a private plan change to the PDP. It is currently necessary for a landowner who wishes to change the zoning of its land to ask the Council to notify a variation. In this situation, the Council has clear and unfettered discretion to support or not support the variation being mindful of the risk that variations present to the already complex staged plan review and appeals process and the significant cost to ratepayers of extending the plan review process any further.
- 12 In this instance the landowner is proposing to commission the majority of the work to support the variation, just as they would if they were able to lodge a private plan change. A variation to change the zoning of the site would be incorporated as part of Stage 4 of the District Plan review.
- 13 Moving to a situation where the PDP can be made operative in part will produce huge benefits in terms of simplifying resource management processes and producing better and more consistent outcomes for communities and the environment. There is a balance to be struck between promoting further variations which benefit developers and which could delay the conclusion of the current plan review and with the Council and the district plan process being suitably responsive to the need to assist with economic recovery in appropriate situations.
- 14 **Appeals:** There are a number of outstanding appeals related to Stages 1 and 2 of the PDP, including appeals by Transpower, Universal Developments Wayfare and Airbnb to objectives policies and rules in Chapter 8 Medium Density Residential zone. However, the appeals are specific to particular topics and since the rezoning proposal is to extend an urban zoning such as MDR and not to change the rules or standards in the chapter itself, the rezoning proposal is not anticipated to be affected by the appeals.
- 15 **Site Background:** A request for consideration of the site to be a special housing area (**SHA**) was discounted in 2018 by virtue of the ONL classification on part of the site. The location of the ONL line was subject to appeal under Stage 1 of the PDP. The appeal was settled by a Consent Order on 23 September 2019 which removed the ONL classification from the majority of the site, thereby removing this barrier to urban development.
- 16 **The Medium Density Residential Zone:** the MDR zone provides land for residential development at greater density than the Lower Density Suburban Residential (LDSR) zone enabling terrace housing, semi-detached housing and detached townhouses on small sites

of 250m² or greater that are likely to suit smaller households, older people and transient workers. In conjunction with the High Density Residential (HDR) and LDSR zones, this zone plays a key role in minimising urban sprawl, increasing housing choice and increasing housing supply.

- 17 The zone is situated in locations in Queenstown, Frankton, Arrowtown and Wānaka that are within identified urban growth boundaries, and easily accessible to local shopping zones, town centres or schools by public transport, cycling or walking. The zone provides for an increased density of housing in locations that are supported by adequate existing and planned infrastructure, but could also support limited non-residential activities where these enhance residential amenity or support a nearby Town Centre.
- 18 Given the steep topology of the subject site with three flatter areas, and its relative proximity to the Queenstown Town centre, developing housing typologies in line with those anticipated by the MDR zone is considered more feasible than developing housing typologies anticipated within the LDSR zone. The MDR zone is therefore the preferred zoning proposed to be investigated for the site.
- 19 **Wāhi Tūpuna:** The site forms part of a larger wāhi tūpuna area identified in the notified Stage 3 Wāhi Tūpuna Chapter 39. Site 16 (Punatapu) has the following identified values and threats associated with it:
 - Values: Tauraka waka; settlements; archaeological values.
 - Threats: earthworks; subdivision and development; buildings and structures; energy and utility activities.
- 20 It is acknowledged that a large number of submissions to the notified Wāhi Tūpuna chapter and overlay seek a range of changes to it including deletion, which are still to be determined by the Independent Hearing Panel (**the Panel**). Hearings on this matter are underway. However, the aim of the Wahi Tupuna proposals is to give effect to unchallenged parts of Chapters 3 (District Wide Issues) and 5 (Tangata Whenua) of the PDP and to give effect to section 6 of the Resource Management Act which lists recognising and providing for the relationship of Maori and their culture and traditions with their lands, water, sites, waahi tapu, and other taonga as a matter of national importance. Section 8 also obliges Councils to take into account the principles of the Treaty of Waitangi.
- 21 The landowner has sought preliminary comment from local iwi groups (Aukaha and Te Ao Marama), who do not support the proposal at this stage. However, the Wāhi Tūpuna provisions are at an early stage, and the landowner is in conversation with local Iwi on whether they can recognise and celebrate cultural values in executing the urban development, such as through street and place names, architectural interpretation, interpretation panels and ecological mitigation. This would aim to recognise the historic associations of the Punatapu wāhi tūpuna and they are open to further considering the idea. Alternatively, a cultural impact study would be undertaken prior to notification to explore these issues further.

22 **National Policy Statement on Urban Development Capacity:** When considering the National Policy Statement on Urban Development Capacity 2016 (**NPS UDC**), it is noted that the Queenstown Lakes Housing Development Capacity Assessment 2017 found that there is enough land zoned in the Wakatipu ward urban environment to meet anticipated demand under medium and high growth scenarios. However, a significant portion of the available greenfield land is owned by a small number of landowners, which has stifled competition and kept demand high and supply slow. Where development has been occurring, it is not delivering the broad range of housing typologies at the price points that the district needs with most development being homogeneous stand-alone single housing typologies at lower densities and high price points.

23 **Mayoral Taskforce on Housing Affordability:** Related to the NPS UDC is the Mayoral Taskforce on Housing Affordability. The Taskforce report includes Recommendation 3:

“Provide more land, intensification and inclusionary zoning.

...while the Proposed District Plan in theory provides sufficient zoned land for growth, as well as providing for increased densities in existing zones, as a means of trying to increase the supply of housing units, further consideration to the identification of and enabling further greenfield land does need to be considered. This could be via future Proposed District Plan processes identifying additional land areas for development, allowing for further Private Plan Changes for residential developments or through further Special Housing Areas.”

24 It is considered that the proposal accords with the above recommendation through providing more urban residential zoned land in a suitable location adjacent to an urban area and through the contribution to the QLCHT.

ANALYSIS AND ADVICE | TATĀRITANGA ME NGĀ TOHUTOHU

25 **Developer’s options:** It is prudent for the Council to understand the options that the landowner has for developing the land and the cost and benefits associated with each option. Currently there are two options that the landowner can pursue to develop the subject site in accordance with the concept masterplan (attachment 2).

26 The first is requesting that the Council notify the rezoning as part of the District Plan review process, to be considered as part of stage 4. This option would enable a collaborative approach between the Council and the landowner so that the Council has more control over the variation and associated provisions notified. In contrast with the second option, it would also bring forward the potential development of the site, which would add development capacity and potentially improve the range of housing typologies available.

27 Risks associated with this option include the potential to add complexity to the already complex staged plan review and appeals process and the cost to ratepayers of potentially extending the plan review process further. To mitigate this, the developer is offering to

commission and pay for the majority of the work to support the variation as well as to contribute 5% of the developed land area to the Queenstown Lakes Community Housing Trust (QLCHT).

- 28 The second option would be to seek a private plan change when the PDP is made operative. It could be several years before the PDP could be operative in part and it would then be a developer lead plan change with less room for collaboration and less opportunity for the Council to influence what is notified. This option would also delay the addition of development capacity and the potential diversification of housing typologies.
- 29 However, this option would not necessarily avoid adding to the complexity of the plan review significantly. Any costs from appeals would be borne by ratepayers with a private plan change but the Council's costs of notifying, processing submissions, hearings and making decisions on the private plan change would be borne by the plan change proponent. At this stage there is no certainty that a contribution to the QLCHT would be able to be secured with a private plan change.
- 30 **Contribution to the QLCHT:** The developer is proposing to contribute 5% of the developed land area to the Queenstown Lakes Community Housing Trust (QLCHT) or equivalent to be secured through a development agreement under the Local Government Act 2002. 5% is a figure that Council secured with a number of plan changes under the operative plan.
- 31 Contributions of 10% and above have been secured through recent SHA developments under the special legislation which essentially shortcuts the process of rezoning the land and involves limited involvement from neighbouring landowners and no appeal rights, all of which greatly speeds up the development process. None of these SHA specific advantages accrue from the proposed 1st schedule process so it may be unreasonable to seek a contribution of more than 5%.
- 32 It should also be noted that a number of rezoning's are currently being sought through submissions to the PDP stage 3 and that these rezoning's generally do not offer any contributions to the QLCHT even though the cost of hearing these submissions are being met by ratepayers as part of the district plan review process.
- 33 **Options for rezoning:** The options for rezoning the site are largely informed by the site constraints. Expert reports commissioned by the landowner (contained within attachment 3 – 4, others available upon request) have addressed these matters. The PDP's strategic direction as outlined below (paragraphs 37 - 50) is also important.
- 34 The most relevant zones in the PDP to consider for the site include the Low Density Suburban Residential (LDSR), Medium Density Residential (MDR) and High Density Residential (HDR).
- 35 The current zoning envisaged is set out within section 4.2 of the Final Overview Report (attachment 1) and a Concept/Indicative Master Plan (attachment 2) has been developed. At this stage, it is considered that the landscape context, the steep slope of the majority

- of the site (with only 4 flatter areas) and the ecological constraints makes the MDR zoning the most feasible and appropriate for the majority of the 'developable areas' of the site.
- 36 It is also proposed to have a buffer of single residential or LDSR units between the existing urban area and the proposed MDR zone, a small area of alternative accommodation or a Visitor Accommodation Subzone and building restriction areas (BRA) for the steeper areas where ecological revegetation planting is proposed.
- 37 It is proposed to either do a mapping variation with this proposed mixture of zones and BRA's for the site, or an MDR zone for the whole non ONL part of the site, but with the detailed land use prescribed by a structure plan contained within the subdivision chapter. A section 32 assessment report will consider these options as well as others to determine the most appropriate zoning and plan provisions for the site.
- 38 **Development effects:** Chapter 25 Earthworks and Chapter 27 Subdivision and Development together with the QLDC Land Development and Subdivision Code of Practise provide a detailed framework for managing the adverse effects of developing a site such as this. At the resource consent stage consent conditions addressing the management of any instability and runoff from construction areas can be implemented, monitored and enforced to ensure there are minimal adverse effects on water quality.
- 39 Residential character and amenity and transport effects is also a relevant consideration. The adjacent Sunshine Bay residents would have opportunity to participate in submitting on the notified rezoning and related provisions, however broadly speaking it should be acknowledged that there could be effects on the views from properties overlooking the site towards the lake. However, as outlined below, the urbanisation would appear in the wider landscape as a logical expansion of the Sunshine Bay urban area and it would not impinge on the adjacent ONL. It is also observed that development of the site would not block views of the lake and would be viewed in the wider backdrop of the ONL around it.
- 40 In terms of residential amenity and transport effects, it should be noted that the Sunshine Bay residential area is an established urban area and that unlike in a rural living, rural lifestyle or rural environment, effects associated with urban development are anticipated. It is also worth noting that the road serving as an access road to the site is an existing paper road and that the existing district plan rules such as road boundary setbacks apply to protect the residential amenity of the adjacent properties as is the case for all roads.
- 41 **Strategic direction of the Proposed District Plan (PDP):** Chapter 3 Strategic Direction sets out the over-arching strategic direction for the management of growth, land use and development in a manner intended to ensure sustainable management of the District's special qualities. It sets out issues that need to be addressed to enable the retention of these qualities and includes associated strategic objectives and policies addressing these matters.
- 42 The proposed variation would enable the development of a residential area in close proximity (3 km) to the Queenstown Town Centre and one of its aims is to facilitate a

compact and denser built form. This outcome is consistent with the strategic direction in Chapters 4 to 6 as set out below.

- 43 The proposed urban zoning and UGB would adjoin the ONL located over the south-western portion of the site and a distinct urban edge would be maintained. The landscape assessment (attachment 3) states that development of the site would appear in the wider landscape as a logical urban extension of the Sunshine Bay urban area and it considered that it would not impinge on the values of the wider adjacent ONL. The new UGB will align with the ONL boundary and act to deter further urban expansion. No build areas are also proposed to protect vegetation areas of very high ecological value along with wilding pine removal, re-vegetation of native species, and pest animal control to compensate for clearing and developing some vegetated areas of high and moderate ecological value. The preliminary details of which are set out within the Ecological Mitigating and Offsetting Report within attachment 4.
- 44 The site has a challenging slope which makes denser development, such as terrace housing and apartments more feasible than a lower density development which would be significantly lower yielding on this constrained site. The proposal will utilise existing infrastructure and services and enable the development of housing typologies at densities which would help minimise urban sprawl and enable a greater supply of diverse housing options. This is an outcome which is in line with the purpose of the MDR zone.
- 45 Based on the information discussed above and received to-date, the proposed rezoning is considered to be generally consistent with strategic direction of the PDP.
- 46 **Chapter 3 – Strategic Direction:** It would enable urbanisation of a type and in a location that would help address the issues outlined in Chapter 3, help provide for the district's anticipated growth, while preserving the district's special qualities without exacerbating existing issues. In particular, urbanisation will occur in a logical manner in accordance with Objective 3.2.2 (*Urban growth is managed in a strategic and integrated manner*) and its associated policy, which specifically addresses Issue 2 (Growth pressure impacts on the functioning and sustainability of urban areas, and risks detracting from rural landscapes, particularly its outstanding landscapes) identified within the Strategic Direction Chapter 3.
- 47 **Chapter 4 – Urban Development:** It is also considered that the proposed extension of the UGB and resulting urban development would be in line with the objectives and policies of the PDP Urban Development Chapter 4, which aims to manage the spatial location and layout of urban development within the District. It is considered that the proposed rezoning would enable urban development which will utilise land and resources in an efficient manner and that it will utilise existing capacities and increase the viability of the existing urban area of Queenstown. It will also provide for growth adjacent to an existing urban area, instead of sporadic residential development within the rural landscape, which will help preserve the natural amenity values of the rural landscapes. Further urban development would be contained by the ONL boundary and new UGB.

- 48 **Chapter 5 – Tangata Whenua:** The chapter sets out that the Council shall recognise and provide for local Iwi as a partner in the management of the District’s natural and physical resources through the implementation of the District Plan. It aims to provide for Ngāi Tahu’s role as kaitiaki (guardians) and to protect its values, interests and customary resources.
- 49 As discussed above, the site forms part of a larger Wāhi Tūpuna area identified in the notified Stage 3 Wāhi Tūpuna chapter 39 with subdivision and development identified as a threat to the values associated with the site. Although the chapter is still in the process of being heard the land owner is committed to work with local iwi groups (Aukaha and Te Ao Marama) and aims to recognise and celebrate cultural values through the future urban development.
- 50 Ideally confirmation of this possibility would be received from local Iwi prior to notification. Alternatively a cultural impact study would have to be undertaken, and the matter explored through the normal submission and hearing process. Subject to this, it is considered that rezoning the site would not be contrary to the objectives and policies contained within chapter 5.
- 51 **Chapter 6 - Landscapes and Rural Character:** The chapter provides greater detail as to how the landscape, particularly outside urban settlements will be managed in order to implement the strategic objectives and policies in Chapter 3. It notes that indigenous vegetation also contributes to the quality of the District’s landscapes and that landscapes have inherent values, particularly to Tangata Whenua. It contains objectives and policies relating to the management of Outstanding Natural Features (ONF), Outstanding Natural Landscapes (ONL), and Rural Character Landscapes (RCL).
- 52 A Consent Order (23 September 2019,) confirmed the ONL line on the site, with the majority of the site not classed as ONL. As outlined within the landscape assessment (attachment 3), this creates a bit of an anomaly as the remaining part of the site by default is classified as a Rural Character Landscape (RCL), but it is a small isolated portion of RCL and is therefore not of much assistance in considering the rezoning of the site. The assessment also considers that urbanisation of the remaining part of the site would appear in the wider landscape as a logical expansion of the sunshine bay urban area and that it would not impinging on the adjacent ONL and the values associated with it. The landscape architect specifically considers that this area of the site is considerably less sensitive to landscape change than the vast majority of locations within the rural parts of the district and that it is suitable for urban/suburban development.
- 53 It is therefore considered that rezoning the site would be non-contrary to the objectives and policies contained within chapter 6.
- 54 Overall, it is considered that the proposed rezoning of the subject site would enable development that would be generally consistent with the Strategic Chapters 3 to 6 of the PDP.

CONSULTATION PROCESS | HĀTEPE MATAPAKI:

> SIGNIFICANCE AND ENGAGEMENT | TE WHAKAMAHI I KĀ WHAKAARO HIRAKA

- 55 This matter is of medium significance, as determined by reference to the [Council's Significance and Engagement Policy](#) because it is a matter relating to the administration of Council affairs and has the potential to impact on the environment, culture and people of parts of the District.
- 56 The persons who are affected by or interested in this matter are residents/ratepayers of the Queenstown Lakes District community, more particularly residents located in the Sunshine Bay residential area and local iwi groups (Aukaha and Te Ao Marama). Particular individuals and entities affected will have substantial opportunities to participate in submitting on the notified provisions and participating in hearings, appealing the decisions and joining any appeals.

> MĀORI CONSULTATION | IWI RŪNANGA

- 57 Consultation with Tangata Whenua under the Resource Management Act 1991 (RMA) is a legal requirement before notifying a district plan and it is noted that legal requirements in this regard will have to be met.
- 58 As outlined above, the landowner has sought a preliminary comment from local Iwi groups (Aukaha and Te Ao Marama), who do not support the proposal at this stage. However, the landowner is in conversation with local Iwi on whether they can reflect cultural values through a future urban development.
- 59 Iwi entities will have the opportunity to submit if this proposed variation were to proceed to notification.

RISK AND MITIGATIONS | NGĀ RARU TŪPONO ME NGĀ WHAKAMAURUTANGA

- 60 This matter relates to the Strategic/Political/Reputation risk. It is associated with SR1 'Current and future development needs of the community (including environmental protection)' within the QLDC Risk Register. This risk has been assessed as having a high inherent risk rating, because it is considered to be of significant importance in terms of the managed growth and regulation of development for the District.
- 61 This report sets out measures to reduce and mitigate the risk with options that implement additional controls for this risk.

FINANCIAL IMPLICATIONS | NGĀ RITENGA Ā-PŪTEA

- 62 There are no budget or cost implications resulting from the decision. The recommended approach can be implemented through current funding under the 10-Year Plan and Annual Plan.

COUNCIL EFFECTS AND VIEWS | NGĀ WHAKAAWEAWE ME NGĀ TIROHANGA A TE KAUNIHERA

63 The following Council policies, strategies, assessments and reports were considered:

- The Operative District Plan
- The Proposed District Plan
- The Queenstown Lakes Housing Development Capacity Assessment 2017
- Mayoral Housing Affordability Taskforce Report – October 2017

64 The recommendations are consistent with the principles set out in the above named policies.

LEGAL CONSIDERATIONS AND STATUTORY RESPONSIBILITIES | KA TURE WHAIWHAKAARO, ME KĀ TAKOHAKA WAETURE

65 The process for undertaking plan changes and variations to a Proposed Plan is set out in the First Schedule of the Resource Management Act.

LOCAL GOVERNMENT ACT 2002 PURPOSE PROVISIONS | TE WHAKATURETURE 2002 O TE KĀWANATAKA Ā-KĀIKA

66 The recommended option:

- Will help meet the current and future needs of communities for good-quality local infrastructure, local public services, and performance of regulatory functions in a way that is most cost-effective for households and businesses;
- Can be implemented through current funding under the Ten Year Plan and Annual Plan;
- Is consistent with the Council's plans and policies; and
- Would not alter significantly the intended level of service provision for any significant activity undertaken by or on behalf of the Council, or transfer the ownership or control of a strategic asset to or from the Council.

ATTACHMENTS | NGĀ TĀPIRIHANGA

A	Overview Report dated 26 May 2020 – Vivian+Espie
B	Sunshine Bay Concept Masterplan set – Boffa Miskell
C	Landscape and visual effects assessment – Vivian+Espie
D	Ecological mitigation and offsetting report – Wildland Consultants Ltd

AVAILABLE UPON REQUEST:

1	Environment Court Consent Order ENV-2018-CHC-56, 23 September 2019
2	Record of Title
3	Geotechnical Review - Geoconsulting Ltd
4	Geotechnical Review - Rockfall Hazard
5	Infrastructure / Servicing report has been prepared by Civilised Ltd
6	Ecological report – Wildland Consultants Ltd
7	Transportation assessment – Stantec
8	Statement on Cultural Values – Vivian+Espie
9	Aukaha preliminary statement (Sunshine Bay) rezone
10	Te Ao Marama preliminary statement (Sunshine Bay) rezone
11	Correspondence with Aukaha Manager (Maree Kleinlangevelsoo)