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North Arm Cove

Overview of the three streams required to unlock the paper subdivision

August 2025

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Introduction – Unlocking North Arm Cove

Unlocking historical paper subdivisions is a longstanding issue recognised by both the NSW Government and MidCoast Council.

In 2013, the NSW Government introduced Paper Subdivision legislation into the Environmental Planning and Assessment Act 1979 (Schedule 7). The legislation provided a way to overcome barriers of fragmented ownership and lack of infrastructure, and to enable land owners to work together with an appropriate authority to fund the provision of infrastructure and unlock the potential of the land.¹

This legislation created a pathway that enabled paper subdivisions to be resolved at Riverstone in the North Western Sydney Growth Centre. Landcom was appointed as the 'Relevant Authority' to work with landowners, NSW government agencies and Blacktown Council to unlock the paper subdivision. To date, this is the only example of either

State or Local government unlocking a paper subdivision.

In 2022, the Department of Planning Housing and Infrastructure (DPHI) released the *Hunter Regional Plan 2041* which includes a Planning Priority for the Coastal District about historical paper subdivisions. While the Priority recognised the significant challenges associated with paper subdivisions, it also paves the way for further investigations to be undertaken to options to unlock the historical paper subdivisions.

At the local level, MidCoast Council, as part of the preparation of the consolidated MidCoast LEP, has undertaken extensive analysis of many of the paper subdivisions located in the MidCoast LGA. Many of the subdivisions are located along the northern shores of Port Stephens.

Recognising the need to take action to resolve the environmental, social and economic problems caused by paper subdivisions, Council proposes to zone all paper subdivisions C4 Environmental Living with a 10 hectare minimum lot size in the final draft MidCoast LEP (MCLEP).



Figure 1: Study Area. Source AEP Biodiversity Risk Assessment 2023

¹<https://www.parliament.nsw.gov.au/bill/files/1464/2R%20ENVIRONMENTAL%20PLANNING%20AND%20ASSESSMENT%20AMENDMENT%20BILL%202012.pdf>

However, updating LEP controls in this way will not be enough to resolve the environmental, social and economic problems created by paper subdivisions.

In anticipation of these proposed LEP amendments, Alathan, a major landholder at North Arm Cove, has commenced three interdependent work streams required to unlock North Arm Cove:

Stream 1: preparation of a planning proposal to rezone the land for urban purposes

Stream 2: biodiversity certification – whilst normally integrated into the planning proposal process, the size and complexity of the environmental issues requires a separate but interdependent biodiversity certification process

Stream 3: creation of a Development Plan to dissolve the current paper subdivision and create a new subdivision plan, under the EP&A Act Schedule 7.

Alathan has the ability, preparedness and commitment to lead the delivery of a solution that balances both environmental and landowner objectives. Alathan wants to continue to work closely with MidCoast Council, key NSW Government agencies and landowners to unlock North Arm Cove.

It should be acknowledged that, if it was not for the existence of the paper subdivision, Alathan would not be pursuing this planning proposal.

The key benefits of Alathan's approach include:

- resolution of long standing environmental, social and economic problems caused by paper subdivisions
- creation of a replicable process that can be adopted to resolve other paper subdivisions in both MidCoast and other parts of NSW
- protection of critical terrestrial and aquatic habitat that continue to be degraded under current arrangements
- restoration and ongoing management of the environment including bushfire, cultural heritage, decontamination and rubbish removal
- creation of a substantial new source of housing supply for the MidCoast within a holistically designed masterplanned community that can deliver diverse housing, new local centres and new employment.

The purpose of this report is to:

- provide an overview of the complexities associated with unlocking paper subdivisions
- outline the three interdependent streams required to unlock the paper subdivision
- outline the benefits of Alathan's approach

Unlocking North Arm Cove Paper Subdivision

Background and context

The subject site at North Arm Cove is the largest of a number of historic paper subdivisions within the MidCoast LGA. Undertaken in 1918, the subdivision was designed by Walter Burley Griffen and was originally under consideration as Australia’s national capital.

While Canberra was chosen as the nation’s capital, North Arm Cove was still considered as having potential to become ‘Port Stephens City’ and Australia’s answer to New York City.

A “paper subdivision” refers to land with lots that exist only on paper. These lots typically lack actual roads, drainage, water, sewer, and electricity infrastructure².

The subdivision has, however, largely remained undeveloped due to the difficulties associated with unlocking paper subdivisions. In the 1960’s, a narrow strip of land at North Arm Cove along the foreshore of Port Stephens was zoned urban in recognition of houses already built. According to 2021 census data, the locality of North Arm Cove

contained 340 dwellings, although around a third of these were unoccupied on the census date.

The paper subdivision is currently zoned RU2 Rural Landscape zoning with a minimum lot size 40 hectares, which effectively prohibits subdivision and means existing lots have no dwelling entitlement. When the MidCoast LEP is finalised within the next 12 months, it is assumed the land will be zoned C4 Environmental Living with a 10 hectare minimum lot size.

Lots within the paper subdivision have been bought and sold for over 100 years. Some owners use the lots for occasional camping and many owners remain hopeful that planning rules will change to allow them to develop housing. Council is regularly required to acquire privately-owned lots in lieu of unpaid rates and charges. Unauthorised development and illegal dumping within the paper subdivision present an ongoing compliance challenge for Council.

The 300 homes in the Village zoned land at North Arm Cove do not have

access to reticulated water or wastewater. Consequently, existing dwellings rely on rainwater tanks and septic systems, most of which require regular pump-out.

These systems vary in age and condition and pose a considerable land and marine pollution risk.

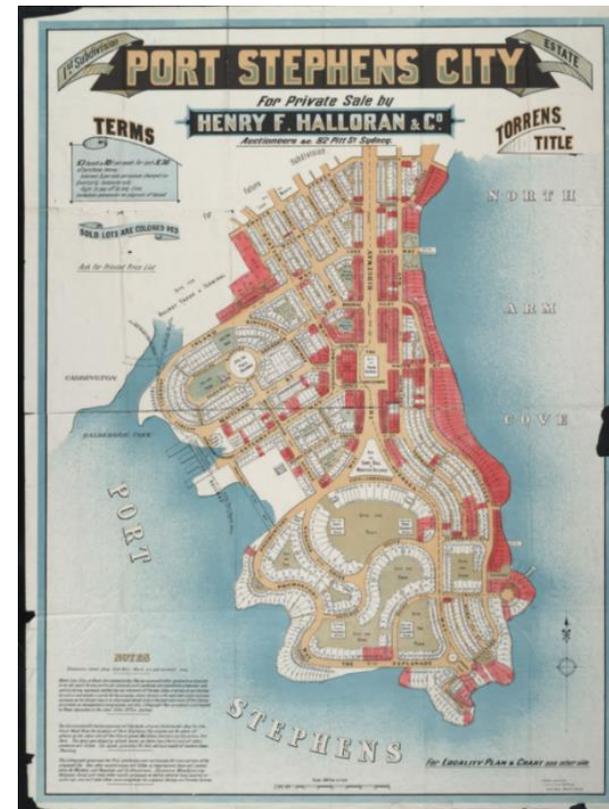


Figure 2: Henry Halloran First Subdivision circa 1920

² Paper Subdivision Analysis Report, MidCoast Council, 2022

Current Landownership

Land at North Arm Cove has continued to be sold and purchased since the initial subdivision in the 1920's.

This is a summary of the approximate landownership for both the paper subdivision (non-urban) and urban areas.

Paper subdivision (non-urban) land

| | |
|---------------------|----------------------|
| Land size | 575 ha |
| Lots | Approx. 3,600 lots |
| Land owners | Approx. 2,100 owners |
| Zone | RU2 Rural Landscape |
| Min Lot Size | 40ha |

Major Paper subdivision land holders

| | |
|-------------------------|-------------------|
| Alathan | Approx 70 ha |
| Walker Corp | Approx 75 ha |
| MidCoast Council | Approx 1,000 lots |

Urban Land (zoned in 1960s)

| | |
|-------------------|-------------|
| Lots/homes | Approx 300 |
| Zone | RU5 Village |



Figure 3: current subdivision pattern

The three streams required to unlock North Arm Cove

While the proposed MCLEP is a positive step in the right direction, the provisions alone are not sufficient to unlock and deliver a coordinated land tenure, infrastructure and biodiversity solution for North Arm Cove.

These three streams work together to establish an implementable framework and economic basis to deliver infrastructure and resolve complex land tenure and biodiversity constraints.

Alathan's approach will provide solutions to the paper subdivision problem.

Stream 1: Planning Proposal

Purpose:

To rezone the land to create a masterplanned community including:

- Creation of a permanent environmental protection of critical habitat
- Provision of a range of low and medium density dwellings
- A local centre
- Open space
- Community facilities
- employment opportunities close to Gooreengi Road

The Planning proposal will follow the LEP Making Guidelines 2023.

Stream 2: Biodiversity certification

Purpose:

Given the environmental significance of land within North Arm Cove, it is proposed to undertake Strategic Biodiversity Certification along side the Planning Proposal.

Strategic Biodiversity Certification offers significant benefits including:

- Protecting terrestrial habitat from further degradation
- Creating new conservation corridor by connecting Karuah Nature Reserve to Pindimar Flats
- Improving water quality in Port Stephens
- Contributing to wider efforts to protect Swift Parrot habitat

Stream 3: Development Plan

Purpose:

A development plan must be prepared under the Schedule 7 of EP&A Act to unlock the paper subdivision. Landowners must also take part in a ballot to vote for the subdivision plan.

The current subdivision was prepared in the early 1900's and does not reflect contemporary values in regard to responding to areas of environmental significance, indigenous heritage, access to waterfront, as well as best practice urban development.

DPHI's Planning for Paper Subdivision Guidelines 2014 (Appendix A) will be followed to create the new development plan.

Stream 1: Planning Proposal

While the proposed MidCoast LEP will zone the land C4 Environmental Living with a 10ha minimum lot size, these proposed LEP provisions will not enable landowners to develop their land.

While there are 3 major landowners in North Arm Cove, the majority of lots are owned by individual landowners. The average lot size is less than 1,000sqm. As such, in order to develop land with the proposed LEP controls, land owners would need to firstly purchase and amalgamate enough lots to create a 10 hectare parcel and secondly satisfy development conditions regarding biodiversity, bushfire, infrastructure requirements and public road access.

It would not have been possible for MidCoast Council to undertake the necessary technical studies to support the rezoning of North Arm Cove during the preparation of the consolidated MidCoast LEP.

As such, Alathan proposes to prepare a Planning Proposal supported by the necessary technical studies to enable the zoning of the land for urban purposes.

The purpose of the Planning Proposal is to:

- identify and permanently protect areas of significant environmental values from further environmental degradation
- deliver a masterplanned community with new homes, open space, a new local centre and local employment opportunities.

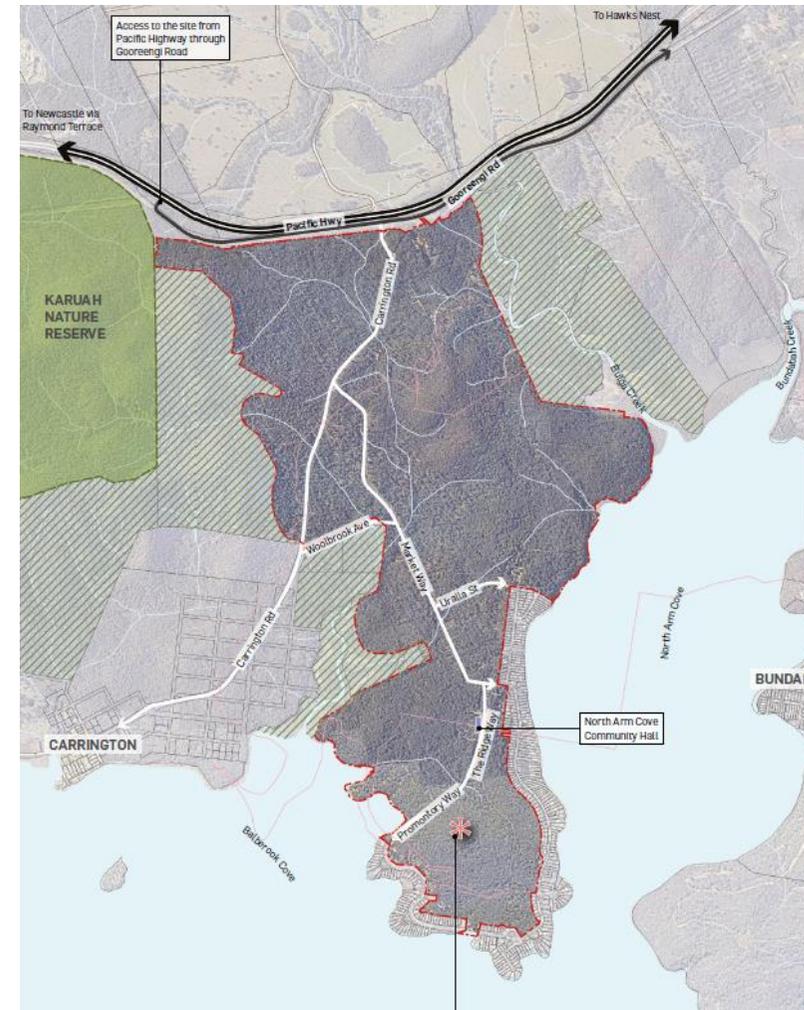


Figure 4: site map

Background – the evolution of paper subdivision planning controls during the preparation of the MidCoast LEP

MidCoast Council is in the final stages of preparing a new Local Environmental Plan that consolidates the Gloucester LEP 2010, Great Lakes LEP 2014 and Greater Taree LEP 2010.

There are at least 11 paper subdivisions located in the MidCoast LGA, including North Arm Cove, Pindimar, Bundabah, Carrington, Krambach.

Consideration of paper subdivisions was incorporated into the preparation of the Rural Lands Strategy. As part of that consideration, Council recognised that, in relation to paper subdivisions:

“the ongoing uncertainty about the future of land in paper subdivisions must be addressed and that clear and consistent recommendations must be provided as part of the new MidCoast planning framework. This resolve has only increased with the more recent pressures, ongoing concern and interest from the owners of land within paper subdivisions about the future use of their land.”³³

As a result, Council undertook a comprehensive analysis of the paper subdivisions in the MidCoast Local Government Area and reviewed similar paper subdivisions in Lake Macquarie, Shoalhaven and Riverstone (North West Sydney).

This analysis included consideration of 3 options, set out in Figure 6.

The *MidCoast Rural Strategy – the way forward 2022* made recommendations for the proposed zone and minimum lot size for 11 paper subdivisions. The Strategy recommended North Arm Cove be zoned C3 Environmental Management with a 20 hectare minimum lot size.

Table 1 below summarises the evolution of proposed LEP provisions for North Arm Cove during the preparation of the MidCoast LEP.

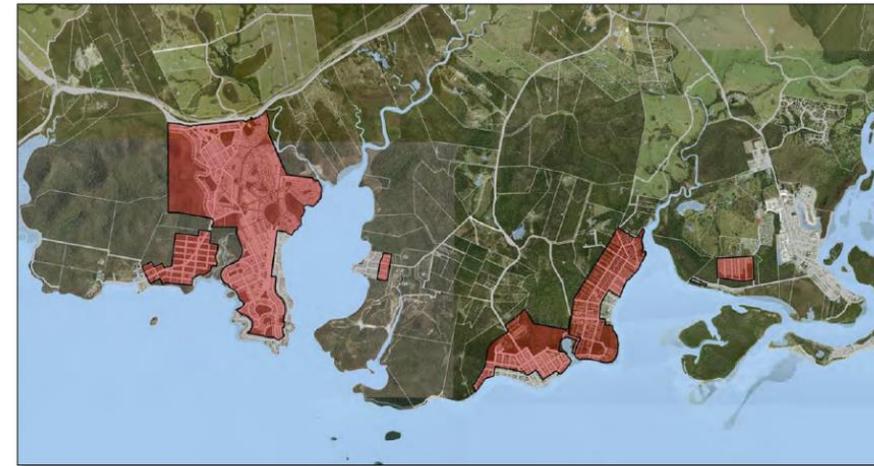


Figure 21: Paper Subdivisions adjoining Port Stephens Bay

Figure 5: Paper subdivisions adjoining Port Stephens. Source: *MidCoast Rural Strategy – The Way Forward 2022*.

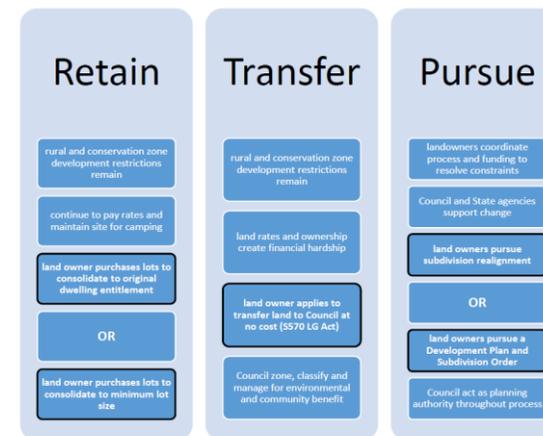


Figure 6: Three options available to owners of land in paper subdivisions. Source: *MidCoast Council Rural Strategy – Paper Subdivision Analysis Report*.

³³ MidCoast LEP Report – Appendix 10 – Paper Subdivision Analysis Report 2022

Table 1: Evolution of proposed LEP provisions for North Arm Cove paper subdivision during preparation of MidCoast LEP.

| | Current zone Great Lakes LEP 2014 | MidCoast Rural Strategy – the way forward December 2022 | DPHI Gateway Determination March 2024 | Draft MidCoast LEP – Public Exhibition Version April 2024 | Council endorsement for final LEP February 2025 |
|--------------------------------|--------------------------------------|--|---|--|---|
| Zone | RU2 Rural Landscape | C3 Environmental Management | C4 Environmental Living | C4 Environmental Living | C4 Environmental Living |
| Minimum lot size | 40 hectares | 20 hectares | 5 hectares | 5 hectares | 10 hectares |
| Building Height Limit | - | - | - | - | 8.5m |
| Paper subdivision map | - | - | Yes | Yes | Yes |
| Additional Local Provisions | - | - | Draft Clause 7.28 & 7.29 | Draft Clause 7.28 | Draft Clause 7.27 |

Draft MCLEP provisions for development on land in paper subdivisions

Under proposed Section 7 Additional Local Provisions, draft clause 7.27 (see extract from draft MCLEP) provides guidance regarding the need to prepare both a development plan and a development control plan, which would control the types of uses, dwelling densities, provision of infrastructure and management of environmental issues.

When the new MCLEP is in force, the only pathway to unlock the subdivision is through the preparation of a Development Plan under the EP&A Act.

7.27 Development on land in paper subdivisions

(1) *The objectives of this clause are as follows—*

- (a) to identify and define the extent of paper subdivision sites in the MidCoast*
- (b) to control the density of development within paper subdivisions in accordance with the character of the location, site constraints and available services, facilities and infrastructure,*
- (c) to ensure that lots are of a sufficient size and shape to accommodate future development,*
- (d) to protect and manage areas of high ecological or scenic landscape value by preventing development on parcels of an inadequate size that may compromise those values.*

(2) *This clause applies to land identified on the Paper Subdivision Map.*

(3) *A Development Plan for sites identified on the Paper Subdivision Map must not be given for development on land to which this clause applies unless a development control plan that provides for the matters specified in subclause (4) has been prepared for the land.*

(4) *The development control plan must provide for all of the following—*

- (a) a staging plan for the timely and efficient release of land, making provision for necessary infrastructure, services and sequencing,*
- (b) an overall transport movement hierarchy showing the major circulation routes and connections to achieve a simple and safe movement system for private vehicles, public transport, pedestrians and cyclists,*
- (c) an overall landscaping strategy for the protection and enhancement of riparian areas and remnant vegetation, including visually prominent locations, and detailed landscaping requirements for both the public and private domain,*
- (d) a network of active and passive recreation areas,*
- (e) stormwater and water quality management controls,*
- (f) amelioration of natural and environmental hazards, including bush fire, flooding and site contamination and, in relation to natural hazards, the safe occupation of, and the evacuation from, any land so affected,*
- (g) detailed urban design controls for significant development sites,*
- (h) suitably located public facilities and services, including provision for appropriate traffic management facilities and parking.*

“Development Plan” has the same meaning as in the Act.

Stream 2: Biodiversity Certification

In recognition of the significant biodiversity values of the land at North Arm Cove, Alathan has commissioned a biodiversity risk analysis report to better understand the opportunities and challenges.

The report identifies that environmental values of North Arm Cove are significant, with 75 percent of the site being mapped as Biodiversity Values Land. The BV map criteria listed as Threatened species or communities with potential for serious and irreversible impacts, is associated with past records of Swift Parrot on the peninsula.

There are 2 possible options in regard the assessment and protection of biodiversity values at North Arm Cove during the planning proposal process:

Option 1: standard biodiversity certification

Option 2: strategic biodiversity certification

While strategic biodiversity certification has significant challenges, it represents the most suitable option to:

- protect terrestrial habitat from further degradation and
- create new conservation corridor by connecting Karuah Nature Reserve to Pindimar Flats
- contribute to wider options to help conserve Swift Parrot habitat.

Alathan has engaged with relevant divisions of the DPHI and NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) about North Arm Cove and potential biodiversity conservation options.

At this point in time, no decision has been made regarding biodiversity certification options and Alathan will continue to engage with agencies and council during the preparation of the planning proposal and technical studies.

Background – ongoing environmental impacts of paper subdivisions

Due to the historical paper subdivision of land in the 1920's, North Arm Cove now has over 2,000 landowners. There are many instances of unauthorised activity such as land clearing, illegal dwellings and, rubbish dumping, including asbestos as outlined below.

Declining water quality from uncontrolled erosion and domestic waste water treatment practices is adversely impacting on the Great Lakes Marine Park's environmental values. These issues are contributing to ongoing and potentially irreversible environmental degradation.

These problems require a holistic solution that protects and enhances biodiversity values of the site, while enabling the orderly and economic development of suitable land, and delivery of infrastructure.

Temporary camping is permitted use in RU2 zoned areas of North Arm Cove. However, there is evidence of permanent uses being established across North Arm Cove.

While there are approved dwellings in or near the RU5 Rural Village zone, there is evidence of other permanent structures that have been built without authorisation or approval. These include informal buildings, sheds, shipping containers and caravan slabs. In addition, while there are formed dirt tracks, they are not formalised roads that present a public liability risk.

The lack of urban zoning, existing infrastructure and services are key issues in paper subdivisions. The absence of access, water, sewer, power and other infrastructure associated with "paper" urban forms results in land that is not capable of substantial development or permanent residential uses.

Use for uses other than what is permissible (i.e. temporary camping to maximum 60 days per year and 2 consecutive days) risks detrimental impacts to the biodiversity and ecology of the area.

North Arm Cove has a high risk of bushfire. All properties have extensive coverage of continuous vegetation that carries significant risk during a bushfire event.

Lack of suitable infrastructure, unsealed fire trails which are prone to erosion, and unauthorised use of land contribute to bushfire risk in relation to life, property and biodiversity values.

Establishing a holistic solution that takes into account the conservation of the site as well as puts in place suitable asset protection zones is essential to safe management of bushfire risk in North Arm Cove.



Unauthorised land uses

Significant areas of land have been cleared across North Arm Cove. These clearings often correspond to unauthorised use of land. Substantial areas of North Arm Cove are identified land as having high biodiversity values and are sensitive to impacts from development and clearing. In addition, some landowners have introduced ornamental or invasive plants species.

North Arm Cove contains habitat for Swift Parrots (critically endangered), Koalas (endangered) and several other flora and fauna species.

The environmental values of North Arm Cove will continue to degrade until an orderly and economic development solution is found that protects and enhances the biodiversity of the site, while enabling residential and supporting development to occur on suitable land.

The original subdivision was not designed to protect areas of biodiversity value. Unless a solution is implemented that protects or offsets areas of high biodiversity value, the ecological value of North Arm Cove will remain at risk and continue to deteriorate.

North Arm Cove is located on the lands of the Worimi people, who have been custodians of the land for thousands of years.

While North Arm Cove holds significant Aboriginal cultural heritage, with some sites managed under the National Parks and Wildlife Act 1974, there is significant opportunity for these places to be further protected. There is evidence of deterioration and the sites are prone to vandalism.



Unauthorised clearing



Unprotected Indigenous heritage

MidCoast Council has undertaken stormwater analysis of the precinct and identified numerous unsealed fire trails run through undeveloped upper areas.

North Arm Cove has many unsealed roads prone to erosion, especially those on steep slopes. Erosion rills often form on these steep roads, concentrating runoff and creating deep gullies. These can make the roads hard to use, especially for the Rural Fire Service. During storms, eroded soil and gravel can block drainage structures or flow directly into North Arm Cove.

Finer sediments can flow through properties and driveways before reaching Port Stephens, increasing water turbidity in North Arm Cove's estuary.

The site also drains into Port Stephens, which is part of the Great Lakes Marine Park. A number of oyster leases are located across Port Stephens particularly in North Arm Cove.

There are a number of dwellings located on zoned land along the waterfront. In the absence of reticulated sewer infrastructure for RU5 Rural Village zoned lots, and together with unauthorised use of land and sediment from unsealed roads within the paper subdivision area, the health of local marine ecology and aquacultural industries are at risk.

The current harvest area status of oyster leases listed on the NSW Government's Food Authority website, indicates that some leases at Bundabah in North Arm Cove are closed due to microbiological results of water testing exceeding the maximum acceptable limits. While no evidence was sighted as to the root cause of the closure, ongoing unauthorised use in North Arm Cove and the lack of proper infrastructure must be addressed so as to minimise such risks to ecology and these industries.

Illegal dumping is evident in many locations throughout North Arm Cove, which risks the environmental values of the land.

Evidence of dumped asbestos is of particular concern noting its detrimental effects relating to environmental contamination, public health and safety and economic costs associated with the cleaning up and remediation of contaminated land.



Unsealed roads



Pollution of the marine environment



Illegal dumping

Stream 3: Paper Subdivision Development Plan

At the core of the paper subdivision problem is the difficulty in unlocking privately owned and undeveloped land for a historically-intended purpose that is not legally permissible.

In particular, a key limiting factor in unlocking the paper subdivision is the incompatibility between the land ownership pattern, and the legislative framework for protecting land of high ecological value. The original layout and uses intended for North Arm Cove was never designed to protect and conserve environmental values. Nor did it recognise Aboriginal cultural heritage.

As such, the third interdependent stream required to unlock North Arm Cove is the preparation of a 'Development Plan' under Schedule 7 of the Environmental Planning Act 1979. This legislation provides a mechanism for the Minister for Planning to make a Subdivision Order. The Subdivision Order gives an authority specified functions to enable it to re-subdivide the paper subdivision.

1.1.1 Appointment of a Relevant Authority to prepare a Development Plan

Under Clause 2 of Schedule 7, the Minister may designate any of the following authorities as the 'relevant authority' to prepare the Subdivision Order:

- a local council
- the Planning Ministerial Corporation
- a development corporation (such as Hunter and Central Coast Development Corporation)
- Landcom
- any other body prescribed by the Regulation (Note: Currently, none are prescribed).

1.1.2 Process to prepare Development Plan

Making a Development Plan is a long and complex process that requires significant engagement with all landowners. Once a draft Development Plan has been prepared, landowners must participate in a ballot to vote for or against the new subdivision.

The Minister cannot make a subdivision order unless at least 60% of the total number of owners of the land, and the owners of at least 60% of the total area of that land have consented to the proposed development plan.

1.1.3 Interdependence with the Planning Proposal and Biodiversity certification

In order to prepare a Development Plan, the necessary technical studies must be prepared that enable the preparation of a new subdivision plan. This work will be completed as part of the Planning Proposal stream.

1.1.4 Current status of Development Plan stream

Alathan has held discussions with both MidCoast Council and Hunter and Central Coast Development Corporation (HCCDC) in regard to their willingness to be appointed as the Relevant Authority.

For more information about the Development Plan process, please see the *Planning for Paper Subdivisions Guidelines 2014*

Benefits of Alathan's approach

It needs to be acknowledged that current highly fragmented land ownership regime will only result in ongoing terrestrial & aquatic environmental degradation, and well as ongoing social and economic impacts for Council, non-urban landowners and existing residents.

Alathan has the ability, preparedness and commitment to lead the delivery of a solution that balances both environmental and landowner objectives.

Key benefits of Alathan's approach:

Resolves long standing problems caused by paper subdivision:

- resolves the problems stemming from over 2,100 landowners managing their properties in varying ways – removing vegetation, illegal dumping, illegal dwellings
- reduces resourcing burden on MidCoast Council regarding complex land management issues associated with multiple land owners, and impacts of unsewered properties on the marine environment

Creates a new replicable and developer-led path for other paper subdivisions that cannot be unlocked

- there have been concerted efforts by other councils and the NSW government to unlock paper subdivisions in the past, with the only success being at Riverstone, which was led by Landcom

- North Arm Cove can be used as a pilot to test and potentially amend legislation that would enable the private sector and landowners to lead the resolution of other paper subdivision without having to rely on State or local government to lead the process.

Protects critical habitat that continues to be degraded:

- critical habitat will be permanently protected through the strategic biodiversity certification process
- a new East-West biodiversity corridor will be established between the Karuah Nature reserve and Pindimar Flats, which will enhancing regional biodiversity outcomes
- water quality in the Great Lakes Marine Park will improve when dirt roads are closed and sewer is provided to both existing and new urban areas

Creates a new masterplanned community:

- creation of a new subdivision layout that reflects modern environmental values, while respecting key principles of the Walter Burley Griffin vision
- provision of approximately 3,000 new homes with a range of lot sizes and housing types and pricepoints that reflect environmental constraints as well as the needs of the local community
- provision of two local centres that will create new opportunities for local services to be provided within the community, reducing car reliance and creating a sense of community
- provision of new employment lands close to Goorengi Road.

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