From: "Rod Young" <young.roderick@gmail.com>
Sent: Mon, 24 Aug 2026 08:43:49 +1200
To: "Submissions" <Submissions@southwaikato.govt.nz>
Cc: "Song" <sz.young@yahoo.com>
Subject: Submission on Proposed Plan Change 4 – Urban Growth
Attachments: PC4_Submission_108_Newell_Road_Roderick_and_Song_Young.docx

Submission on Proposed Plan Change 4 – Urban Growth

Proposed Tokoroa Residential Growth Cell 4 – 108 Newell Road

To: South Waikato District Council
Plan Change: Proposed Plan Change 4 – Urban Growth

Submitter: Roderick J. Young
Property: 108 Newell Road, Tokoroa
Legal description: Lot 2 DPS 15068
Area: approximately 8.0937 hectares

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1. Nature of submission

I support the overall purpose of Proposed Plan Change 4 to plan strategically for the residential, commercial and industrial growth of the South Waikato District through to 2054.

I oppose Plan Change 4 to the extent that it fails to identify 108 Newell Road, Tokoroa as land suitable for present or future residential urban development.

I seek an amendment to the notified Plan Change 4 planning maps and provisions so that the approximately 8.1 hectare property at 108 Newell Road is incorporated into Tokoroa's planned residential growth framework.

I propose that the site be identified as:

Tokoroa Residential Growth Cell 4 – Newell Road

and rezoned General Residential Zone.

If Council is not satisfied that immediate live residential zoning is appropriate, I alternatively request that the whole property be rezoned:

Future Urban Zone – Residential

with its intended long-term use expressly identified as residential development.

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2. Specific decision requested

I request that South Waikato District Council:

Primary relief
1. Amend the Proposed Plan Change 4 planning maps to identify **Lot 2 DPS 15068, 108 Newell Road, Tokoroa as a new residential growth cell.**
2. Identify the area as:

Tokoroa Growth Cell 4 – Newell Road Residential.
3. Rezone the approximately 8.0937 hectare property from its current rural zoning to **General Residential Zone.**
4. Include any consequential objectives, policies, rules, infrastructure provisions and Development Area Plan provisions necessary to enable coordinated residential subdivision and development.

Alternative relief

If immediate live zoning is considered premature:
5. Rezone 108 Newell Road as **Future Urban Zone – Residential.**
6. Identify the site expressly on the planning maps as land intended for the future residential expansion of Tokoroa.
7. Protect the property from subdivision or development that would frustrate its eventual comprehensive residential development.

Further alternative relief
8. Include 108 Newell Road within an expanded or additional Tokoroa residential growth area, precinct, development area or structure-plan area that achieves substantially the same outcome.
9. Grant such other consequential or alternative relief as is necessary to give effect to the substance of this submission.

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3. Why Newell Road should be considered as part of Plan Change 4

Plan Change 4 is not merely a rezoning exercise for immediate development.

It is intended to determine where urban growth should occur over approximately the next 30 years to 2054.

That makes this the appropriate planning process in which to determine whether 108 Newell Road should remain permanently rural or be recognised as part of Tokoroa's longer-term urban land supply.

The property should be assessed on its long-term planning merits.

It comprises approximately 8.1 hectares in a single freehold title.

It is sufficiently large to support comprehensive planning rather than piecemeal subdivision and is already associated with residential/lifestyle occupation.

It therefore represents a genuine opportunity for future residential development.

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4. Relationship with the existing Tokoroa urban area

108 Newell Road should not be regarded in the same way as an isolated rural property many kilometres from Tokoroa.

It is located immediately within the wider Tokoroa environment and has a close functional relationship with the township.

The property is within a short driving distance of the town centre, schools, employment, retail activities and community facilities.

The strategic question for Plan Change 4 is therefore whether this substantial landholding should form part of the future urban edge of Tokoroa.

I submit that it should.

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5. Comparison with the residential growth areas already proposed by Council

Proposed Plan Change 4 identifies a number of areas around Tokoroa for residential development or future residential development, including:
• Tokoroa Growth Cell 1 at 292 Maraetai Road North;
• Tokoroa Growth Cell 2 at Richmond Avenue;
• Residential Future Urban Zone 1 at 234 and 242 Maraetai Road;
• Residential Future Urban Zone 2 at Paraonui Road; and
• land at Princess Beatrix Avenue proposed to be rezoned from General Rural to General Residential.

These proposals demonstrate an important planning principle underlying Plan Change 4:

existing rural zoning is not, by itself, a reason why land on the margins of Tokoroa should remain rural.

Council is expressly considering rural land for residential conversion where that land can contribute to future urban growth.

The same analysis should therefore be applied to 108 Newell Road.

The question is not simply:

“Is 108 Newell Road presently rural?”

The correct strategic planning question is:

“Should this approximately 8.1 hectare property form part of Tokoroa’s urban land supply during the period to 2054?”

I submit that the answer is yes.

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6. A logical additional growth cell

The Council has elected to use identified “growth cells” as a mechanism for managing urban expansion.

108 Newell Road is capable of being treated in exactly the same manner.

It could be designated:

Tokoroa Growth Cell 4 – Newell Road

A Development Area Plan could subsequently establish matters including:
• principal road access;
• internal road connections;
• pedestrian and cycling connections;
• indicative residential blocks;
• stormwater treatment;
• reserves and open space;
• wastewater servicing;
• drinking-water servicing;
• electricity and telecommunications;
• landscaping and boundary treatment; and
• staging of development.

There is therefore no need for every detailed engineering matter to be resolved before Council identifies the strategic future use of the land.

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7. Significant potential contribution to housing supply

The site has an area of approximately 80,937 square metres.

That is a substantial area in the context of residential development.

The theoretical number of lots should not be treated as an expectation because land would be required for roads, stormwater, reserves, infrastructure and other purposes.

However, the site's scale demonstrates why it warrants strategic consideration.

Even comparatively low-density development could provide a significant number of new homes.

At more efficient residential densities, the property could potentially contribute well over one hundred dwellings, subject to engineering, environmental, infrastructure and planning assessment.

That is not an insignificant contribution to the future housing stock of Tokoroa.

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8. Plan Change 4 itself supports more efficient residential land use

Plan Change 4 proposes important changes to residential subdivision rules, including reducing the minimum General Residential allotment size from 450 square metres to 300 square metres.

Council is therefore deliberately seeking to use residential land more efficiently.

It would be inconsistent to focus exclusively upon increasing density inside existing residential areas without also considering suitable contiguous landholdings capable of accommodating well-designed future neighbourhoods.

108 Newell Road provides such an opportunity.

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9. Diversification of Tokoroa's residential land supply

There is strategic value in providing more than the minimum calculated quantity of residential land.

Not every landowner whose property is rezoned will necessarily develop it.

Development may be delayed by:
• financing;
• market conditions;
• infrastructure;
• ownership decisions;
• construction costs;
• engineering requirements;
• consenting issues; or
• changes in economic circumstances.

A nominal amount of zoned capacity therefore does not necessarily translate into housing being delivered when required.

Including Newell Road would add an additional independent source of residential land supply.

This would improve resilience and choice in the Tokoroa housing market.

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10. Competition and housing affordability

A healthy land market should not depend upon a small number of landowners controlling the majority of future developable land.

Identifying additional development opportunities can:
• increase competition between development areas;
• increase consumer choice;
• reduce land-supply constraints;
• provide alternative development timing;
• encourage innovation in housing types; and
• potentially moderate the price of serviced residential land.

The planning system should therefore consider not merely theoretical capacity but the diversity and deliverability of future land supply.

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11. Existing use and characteristics of 108 Newell Road

The property is already substantially associated with residential and lifestyle use.

It contains an established dwelling and associated improvements and is held in a single freehold title.

The landholding is approximately 8.1 hectares.

Its existing characteristics therefore make it materially different from an extensive productive rural farm remote from an urban settlement.

The proposed change would establish a pathway from existing lifestyle/residential use toward more efficient residential use over time.

—

12. Infrastructure should determine staging, not defeat strategic identification

I recognise that residential urban development cannot proceed without adequate infrastructure.

Relevant matters include:
• drinking water;
• wastewater;
• stormwater;
• road capacity;
• safe vehicle access;
• pedestrian connections;
• telecommunications;
• electricity;
• emergency access; and
• reserves and community infrastructure.

I do not submit that the Council should disregard these matters.

Rather, I submit that they should determine how and when the property is developed, not necessarily whether it should be identified for residential development at all.

Plan Change 4 itself demonstrates this distinction through the creation of Future Urban Zones.

Where land is strategically appropriate for residential development but infrastructure is not yet sufficient, the appropriate response is Future Urban zoning and staged release.

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13. Future Urban Zone provides a practical fallback

Council describes Future Urban Zones as land set aside for possible urban development in the longer term.

This mechanism is particularly suitable for 108 Newell Road if Council concludes that immediate General Residential zoning requires further investigation.

Future Urban zoning would:
1. formally recognise the site's long-term residential purpose;
2. prevent incompatible development from sterilising the land;
3. allow Council to undertake coordinated infrastructure planning;
4. allow detailed transport and engineering investigations;
5. enable development to be timed according to demand; and
6. avoid requiring the Council to commit immediately to infrastructure expenditure.

For these reasons there is a strong case that, at a minimum, 108 Newell Road should be included in the residential Future Urban Zone.

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14. Transport assessment

Future development would require assessment of the capacity and safety of Newell Road and the surrounding transport network.

That assessment could determine:
• the appropriate location and design of access;
• intersection improvements, if required;
• internal road layout;
• connections to adjoining land;
• walking and cycling connections;
• emergency access; and
• development staging.

These matters can be imposed through a Development Area Plan and subdivision provisions.

The submission does not seek to predetermine their technical resolution.

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15. Water and wastewater

Plan Change 4 expressly links new urban development with infrastructure capacity.

That principle is accepted.

The appropriate approach for Newell Road would be to determine:
1. whether existing reticulated services can be extended to the property;
2. what network upgrades might ultimately be required;
3. whether development could occur in stages;
4. what development contributions would appropriately be payable; and
5. whether infrastructure thresholds or Household Unit Equivalent limits should apply.

If necessary, development rights could be conditional upon sufficient network capacity becoming available.

—

16. Stormwater and natural hazards

Any residential development should appropriately manage:
• overland flow paths;
• flood risk;
• land stability;
• geotechnical suitability;
• stormwater quantity and quality;
• effects upon downstream properties and waterways; and
• ecological or riparian values.

I accept that technical investigation would be required before subdivision.

The purpose of this submission is to obtain the strategic zoning necessary to allow those subsequent investigations and consent processes to occur within an urban-development framework.

—

17. Environmental considerations

Residential development of the property need not require development of every square metre.

A Development Area Plan could identify areas required for:
• stormwater management;
• riparian planting;
• landscape buffers;
• ecological enhancement;
• public open space;
• reserves;
• walking connections; and
• protection of any sensitive features identified through technical assessment.

Comprehensive urban planning may therefore provide opportunities for environmental improvement as well as housing development.

—

18. Efficient use of existing community infrastructure

Housing located near an established town can make more efficient use of existing community investment.

Future residents of Newell Road would have access to Tokoroa's:
• schools;
• shops;
• health services;
• recreational facilities;
• community facilities;
• employment areas;
• emergency services; and
• transport networks.

This is preferable in strategic terms to dispersed residential development remote from established services.

—

19. Economic benefits

Residential development of approximately 8.1 hectares could provide economic benefits to Tokoroa and the wider South Waikato District.

These could include:
• subdivision and civil construction employment;
• building activity;
• demand for local trades;
• professional and engineering work;
• additional retail expenditure;
• population growth;
• increased utilisation of local services; and
• expansion of Council's residential rating base.

These are relevant considerations when weighing the costs and benefits of the requested amendment.

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20. Section 32 considerations

Section 32 evaluation requires consideration of whether planning provisions are the most appropriate means of achieving the relevant objectives and requires assessment of costs, benefits, efficiency and effectiveness.

The reasonable alternatives for 108 Newell Road include:

Option A – retain General Rural zoning indefinitely

This provides no recognised pathway toward urban development and risks overlooking a substantial property close to Tokoroa during a plan change specifically intended to plan growth through to 2054.

Option B – immediately rezone General Residential

This maximises certainty and allows development to proceed subject to infrastructure and resource-consent requirements.

Option C – Future Urban Residential zoning

This establishes the strategic direction while allowing development to be deferred until infrastructure and other prerequisites are satisfied.

I consider Option B preferable if infrastructure investigations demonstrate that servicing is reasonably achievable.

If Council is not presently satisfied on that matter, Option C is clearly preferable to Option A.

—

21. Risk of not acting

Plan Change 4 is a relatively rare opportunity to review Tokoroa's urban growth boundary comprehensively.

If 108 Newell Road remains excluded, residential development of the land could require a future private plan-change process involving considerable expense, duplication of planning analysis and delay.

It is more efficient for Council to consider the property now, alongside the other rural and peri-urban areas already being evaluated through Plan Change 4.

There is little strategic benefit in deliberately excluding potentially suitable growth land now only to require substantially the same planning questions to be reconsidered later.

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22. Requested addition to the planning maps

I request that the notified Tokoroa Plan Change 4 planning map be amended to show:

TOKOROA GROWTH CELL 4 – NEWELL ROAD

covering the property legally described as:

Lot 2 DPS 15068, 108 Newell Road, Tokoroa – approximately 8.0937 hectares

with the land shown as General Residential Zone.

Alternatively, the same land should be identified as:

TOKOROA RESIDENTIAL FUTURE URBAN ZONE 3 – NEWELL ROAD

or equivalent terminology adopted by Council.

—

23. Development Area Plan

If Council considers a Development Area Plan necessary, I support such a requirement.

I request that the Plan permit the detailed Development Area Plan to be prepared following technical assessment rather than rejecting rezoning solely because a final development layout has not yet been produced.

The Development Area Plan could appropriately address:
• transport connections;
• water and wastewater;
• stormwater;
• reserves;
• open space;
• ecological matters;
• residential density;
• staging;
• infrastructure thresholds; and
• connectivity with adjoining land.

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24. Hearing

I wish to be heard in support of this submission.

I request the opportunity to present planning, property, infrastructure and other evidence at the hearing.

If another submitter makes a submission seeking similar relief, I would consider presenting a joint case where appropriate.

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25. Overall relief sought

For clarity, my preferred hierarchy of outcomes is:

First preference:
Rezone the whole of 108 Newell Road as General Residential Zone and establish Tokoroa Growth Cell 4 – Newell Road Residential.

Second preference:
Rezone the whole property as Future Urban Zone – Residential and identify it for eventual residential development.

Third preference:
Include the property within any expanded residential growth boundary, precinct, Development Area Plan or other planning mechanism that provides a clear pathway to future residential urbanisation.

I also seek any consequential amendments necessary to the maps, objectives, policies, rules, schedules, appendices and Development Area Plans to give effect to this relief.

—

26. Conclusion

Proposed Plan Change 4 asks an important question:

Where should Tokoroa grow during the period to 2054?

108 Newell Road should form part of that discussion.

It is approximately 8.1 hectares held in a single title, already associated with residential/lifestyle occupation and located within the immediate wider Tokoroa environment.

Council is already proposing to convert other rural land around Tokoroa to General Residential or Future Urban zoning.

There is therefore no principled reason to exclude Newell Road from equivalent assessment.

The site offers the potential for a comprehensively planned residential neighbourhood capable of making a material contribution to future housing supply.

If infrastructure is presently sufficient, it should be live-zoned General Residential.

If infrastructure is not yet sufficient, that is precisely the circumstance for which the Future Urban Zone has been created.

I therefore request that 108 Newell Road be incorporated into Proposed Plan Change 4 as land intended for the residential growth of Tokoroa.

Roderick J. Young
And
Song Young
Signature: _____RJY _____SZY

Date: Monday 24 August 2026_____

Ph [redacted]
Email young.roderick@gmail.com

sz.young@yahoo.com

Sent from my iPhone

Submission on Proposed Plan Change 4 - Urban Growth

Proposed Tokoroa Residential Growth Cell 4 - 108 Newell Road

To	South Waikato District Council
Plan Change	Proposed Plan Change 4 - Urban Growth
Submitters	Roderick J. Young and Song Young
Property	108 Newell Road, Tokoroa
Legal description	Lot 2 DPS 15068
Area	approximately 8.0937 hectares

Relief sought: General Residential zoning, or alternatively Future Urban Zone - Residential.

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1. Nature of submission

We support the overall purpose of Proposed Plan Change 4 to plan strategically for the residential, commercial and industrial growth of the South Waikato District through to 2054.

We oppose Plan Change 4 to the extent that it fails to identify 108 Newell Road, Tokoroa as land suitable for present or future residential urban development.

We seek an amendment to the notified Plan Change 4 planning maps and provisions so that the approximately 8.1 hectare property at 108 Newell Road is incorporated into Tokoroa's planned residential growth framework.

Our preferred outcome is that the site be identified as Tokoroa Residential Growth Cell 4 - Newell Road and rezoned General Residential Zone.

If Council is not satisfied that immediate live residential zoning is appropriate, we alternatively request that the whole property be rezoned Future Urban Zone - Residential, with its intended long-term use expressly identified as residential development.

2. Specific decision requested

Primary relief

1. Amend the Proposed Plan Change 4 planning maps to identify Lot 2 DPS 15068, 108 Newell Road, Tokoroa as a new residential growth cell.
2. Identify the area as Tokoroa Growth Cell 4 - Newell Road Residential.
3. Rezone the approximately 8.0937 hectare property from its current rural zoning to General Residential Zone.
4. Include any consequential objectives, policies, rules, infrastructure provisions and Development Area Plan provisions necessary to enable coordinated residential subdivision and development.

Alternative relief

5. If immediate live zoning is considered premature, rezone 108 Newell Road as Future Urban Zone - Residential.
6. Identify the site expressly on the planning maps as land intended for the future residential expansion of Tokoroa.
7. Protect the property from subdivision or development that would frustrate its eventual comprehensive residential development.

Further alternative relief

8. Include 108 Newell Road within an expanded or additional Tokoroa residential growth area, precinct, development area or structure-plan area that achieves substantially the same outcome.
9. Grant such other consequential or alternative relief as is necessary to give effect to the substance of this submission.

3. Why Newell Road should be considered as part of Plan Change 4

Plan Change 4 is not merely a rezoning exercise for immediate development. It is intended to determine where urban growth should occur over approximately the next 30 years to 2054.

That makes this the appropriate planning process in which to determine whether 108 Newell Road should remain permanently rural or be recognised as part of Tokoroa's longer-term urban land supply.

The property comprises approximately 8.1 hectares in a single freehold title. It is sufficiently large to support comprehensive planning rather than piecemeal subdivision and is already associated with residential and lifestyle occupation. It therefore represents a genuine opportunity for future residential development.

4. Relationship with the existing Tokoroa urban area

108 Newell Road should not be regarded in the same way as an isolated rural property many kilometres from Tokoroa.

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It is located within the wider Tokoroa environment and has a close functional relationship with the township. The property is within a short driving distance of the town centre, schools, employment, retail activities and community facilities.

The strategic question for Plan Change 4 is therefore whether this substantial landholding should form part of the future urban edge of Tokoroa. We submit that it should.

5. Comparison with the residential growth areas already proposed by Council

Proposed Plan Change 4 identifies a number of areas around Tokoroa for residential development or future residential development, including:

- Tokoroa Growth Cell 1 at 292 Maraetai Road North;
- Tokoroa Growth Cell 2 at Richmond Avenue;
- Residential Future Urban Zone 1 at 234 and 242 Maraetai Road;
- Residential Future Urban Zone 2 at Paraonui Road; and
- land at Princess Beatrix Avenue proposed to be rezoned from General Rural to General Residential.

These proposals demonstrate an important planning principle underlying Plan Change 4: existing rural zoning is not, by itself, a reason why land on the margins of Tokoroa should remain rural.

Council is expressly considering rural land for residential conversion where that land can contribute to future urban growth. The same analysis should therefore be applied to 108 Newell Road.

The relevant strategic question is whether this approximately 8.1 hectare property should form part of Tokoroa's urban land supply during the period to 2054. We submit that the answer is yes.

6. A logical additional growth cell

The Council has elected to use identified growth cells as a mechanism for managing urban expansion. 108 Newell Road is capable of being treated in the same manner.

It could be designated Tokoroa Growth Cell 4 - Newell Road. A Development Area Plan could subsequently establish matters including:

- principal road access;
- internal road connections;
- pedestrian and cycling connections;
- indicative residential blocks;
- stormwater treatment;
- reserves and open space;
- wastewater servicing;
- drinking-water servicing;
- electricity and telecommunications;
- landscaping and boundary treatment; and
- staging of development.

There is therefore no need for every detailed engineering matter to be resolved before Council identifies the strategic future use of the land.

7. Significant potential contribution to housing supply

The site has an area of approximately 80,937 square metres. That is a substantial area in the context of residential development.

The theoretical number of lots should not be treated as an expectation because land would be required for roads, stormwater, reserves, infrastructure and other purposes. However, the site's scale demonstrates why it warrants strategic consideration.

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Even comparatively low-density development could provide a significant number of new homes. At more efficient residential densities, the property could potentially contribute well over one hundred dwellings, subject to engineering, environmental, infrastructure and planning assessment.

8. Plan Change 4 supports more efficient residential land use

Plan Change 4 proposes changes to residential subdivision provisions intended to make more efficient use of residential land, including a reduced minimum General Residential allotment size.

It would be inconsistent to focus exclusively upon increasing density inside existing residential areas without also considering suitable contiguous landholdings capable of accommodating well-designed future neighbourhoods. 108 Newell Road provides such an opportunity.

9. Diversification of Tokoroa's residential land supply

There is strategic value in providing more than the minimum calculated quantity of residential land. Not every landowner whose property is rezoned will necessarily develop it.

Development may be delayed by financing, market conditions, infrastructure, ownership decisions, construction costs, engineering requirements, consenting issues or changes in economic circumstances.

A nominal amount of zoned capacity therefore does not necessarily translate into housing being delivered when required. Including Newell Road would add an additional independent source of residential land supply and improve resilience and choice in the Tokoroa housing market.

10. Competition and housing affordability

A healthy land market should not depend upon a small number of landowners controlling the majority of future developable land.

Identifying additional development opportunities can increase competition between development areas, increase consumer choice, reduce land-supply constraints, provide alternative development timing, encourage innovation in housing types and potentially moderate the price of serviced residential land.

11. Existing use and characteristics of 108 Newell Road

The property is already substantially associated with residential and lifestyle use. It contains an established dwelling and associated improvements and is held in a single freehold title.

The landholding is approximately 8.1 hectares. Its existing characteristics therefore make it materially different from an extensive productive rural farm remote from an urban settlement.

The proposed change would establish a pathway from existing lifestyle and residential use toward more efficient residential use over time.

12. Infrastructure should determine staging, not defeat strategic identification

We recognise that residential urban development cannot proceed without adequate infrastructure. Relevant matters include:

- drinking water;
- wastewater;
- stormwater;
- road capacity;
- safe vehicle access;
- pedestrian connections;
- telecommunications;
- electricity;
- emergency access; and
- reserves and community infrastructure.

These matters should determine how and when the property is developed, not necessarily whether it should be identified for residential development at all.

Plan Change 4 itself demonstrates this distinction through the creation of Future Urban Zones. Where land is strategically appropriate for residential development but infrastructure is not yet sufficient, the appropriate response is Future Urban zoning and staged release.

13. Future Urban Zone provides a practical fallback

If Council concludes that immediate General Residential zoning requires further investigation, Future Urban zoning would provide a practical and proportionate response.

- formally recognise the site's long-term residential purpose;
- prevent incompatible development from sterilising the land;
- allow Council to undertake coordinated infrastructure planning;
- allow detailed transport and engineering investigations;
- enable development to be timed according to demand; and
- avoid requiring Council to commit immediately to infrastructure expenditure.

For these reasons there is a strong case that, at a minimum, 108 Newell Road should be included in a residential Future Urban Zone.

14. Transport assessment

Future development would require assessment of the capacity and safety of Newell Road and the surrounding transport network. That assessment could determine the appropriate location and design of access, intersection improvements if required, internal road layout, connections to adjoining land, walking and cycling connections, emergency access and development staging.

These matters can be imposed through a Development Area Plan and subdivision provisions. The submission does not seek to predetermine their technical resolution.

15. Water and wastewater

The appropriate approach for Newell Road would be to determine whether existing reticulated services can be extended to the property, what network upgrades might ultimately be required, whether development could occur in stages, what development contributions would appropriately be payable and whether infrastructure thresholds should apply.

If necessary, development rights could be conditional upon sufficient network capacity becoming available.

16. Stormwater and natural hazards

Any residential development should appropriately manage overland flow paths, flood risk, land stability, geotechnical suitability, stormwater quantity and quality, effects upon downstream properties and waterways, and ecological or riparian values.

Technical investigation would be required before subdivision. The purpose of this submission is to obtain the strategic zoning necessary to allow those subsequent investigations and consent processes to occur within an urban-development framework.

17. Environmental considerations

Residential development of the property need not require development of every square metre.

A Development Area Plan could identify areas required for stormwater management, riparian planting, landscape buffers, ecological enhancement, public open space, reserves, walking connections and protection of any sensitive features identified through technical assessment.

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18. Efficient use of existing community infrastructure

Housing located near an established town can make more efficient use of existing community investment. Future residents of Newell Road would have access to Tokoroa's schools, shops, health services, recreational facilities, community facilities, employment areas, emergency services and transport networks.

This is preferable in strategic terms to dispersed residential development remote from established services.

19. Economic benefits

Residential development of approximately 8.1 hectares could provide economic benefits to Tokoroa and the wider South Waikato District, including subdivision and civil construction employment, building activity, demand for local trades, professional and engineering work, additional retail expenditure, population growth, increased utilisation of local services and expansion of Council's residential rating base.

20. Section 32 considerations

Section 32 evaluation requires consideration of whether planning provisions are the most appropriate means of achieving the relevant objectives and requires assessment of costs, benefits, efficiency and effectiveness.

The reasonable alternatives for 108 Newell Road include:

Option A - retain General Rural zoning indefinitely.

This provides no recognised pathway toward urban development and risks overlooking a substantial property close to Tokoroa during a plan change specifically intended to plan growth through to 2054.

Option B - immediately rezone General Residential.

This maximises certainty and allows development to proceed subject to infrastructure and resource-consent requirements.

Option C - Future Urban Residential zoning.

This establishes the strategic direction while allowing development to be deferred until infrastructure and other prerequisites are satisfied.

We consider Option B preferable if infrastructure investigations demonstrate that servicing is reasonably achievable. If Council is not presently satisfied on that matter, Option C is clearly preferable to Option A.

21. Risk of not acting

Plan Change 4 is a relatively rare opportunity to review Tokoroa's urban growth boundary comprehensively.

If 108 Newell Road remains excluded, residential development of the land could require a future private plan-change process involving considerable expense, duplication of planning analysis and delay.

It is more efficient for Council to consider the property now, alongside the other rural and peri-urban areas already being evaluated through Plan Change 4.

22. Requested addition to the planning maps

We request that the notified Tokoroa Plan Change 4 planning map be amended to show:

TOKOROA GROWTH CELL 4 - NEWELL ROAD

covering the property legally described as Lot 2 DPS 15068, 108 Newell Road, Tokoroa - approximately 8.0937 hectares, with the land shown as General Residential Zone.

Alternatively, the same land should be identified as TOKOROA RESIDENTIAL FUTURE URBAN ZONE 3 - NEWELL ROAD, or equivalent terminology adopted by Council.

23. Development Area Plan

If Council considers a Development Area Plan necessary, we support such a requirement.

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We request that the Plan permit the detailed Development Area Plan to be prepared following technical assessment rather than rejecting rezoning solely because a final development layout has not yet been produced.

The Development Area Plan could appropriately address transport connections, water and wastewater, stormwater, reserves, open space, ecological matters, residential density, staging, infrastructure thresholds and connectivity with adjoining land.

24. Hearing

We wish to be heard in support of this submission.

We request the opportunity to present planning, property, infrastructure and other evidence at the hearing.

If another submitter makes a submission seeking similar relief, we would consider presenting a joint case where appropriate.

25. Overall relief sought

For clarity, our preferred hierarchy of outcomes is:

First preference: Rezone the whole of 108 Newell Road as General Residential Zone and establish Tokoroa Growth Cell 4 - Newell Road Residential.

Second preference: Rezone the whole property as Future Urban Zone - Residential and identify it for eventual residential development.

Third preference: Include the property within any expanded residential growth boundary, precinct, Development Area Plan or other planning mechanism that provides a clear pathway to future residential urbanisation.

We also seek any consequential amendments necessary to the maps, objectives, policies, rules, schedules, appendices and Development Area Plans to give effect to this relief.

26. Conclusion

Proposed Plan Change 4 asks an important question: Where should Tokoroa grow during the period to 2054?

108 Newell Road should form part of that discussion.

It is approximately 8.1 hectares held in a single title, already associated with residential and lifestyle occupation and located within the immediate wider Tokoroa environment.

Council is already proposing to convert other rural land around Tokoroa to General Residential or Future Urban zoning. There is therefore a strong basis for Newell Road to receive equivalent assessment.

The site offers the potential for a comprehensively planned residential neighbourhood capable of making a material contribution to future housing supply.

If infrastructure is presently sufficient, it should be live-zoned General Residential. If infrastructure is not yet sufficient, Future Urban zoning provides the appropriate staged pathway.

We therefore request that 108 Newell Road be incorporated into Proposed Plan Change 4 as land intended for the residential growth of Tokoroa.

Signatures

Roderick J. Young	**Song Young**
Signature: _____	Signature: _____
Date: _____	Date: _____
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