From: "Amon Martin" <amon.martin@waikatowaters.co.nz>
Sent: Mon, 31 Aug 2026 09:38:35 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Cc: "Eshrita Lata" <eshrita.lata@southwaikato.govt.nz>; "Robin Walker" <robin.walker@waikatowaters.co.nz>; "Aidan Kirkby-McLeod" <aidan.kirkby-mcleod@waikatowaters.co.nz>
Subject: Proposed Plan Change 4: Waikato Waters Submission
Attachments: PC4 submission to SWDC - Final.pdf

Kia ora,

Please find attached Waikato Waters' submission on Proposed Plan Change 4: Urban Growth. Waikato Waters appreciates the opportunity to participate in this process and looks forward to continuing to work collaboratively with South Waikato District Council to ensure future growth is aligned with the planning and provision of resilient water and wastewater infrastructure.

Should you have any questions regarding the submission, please contact me.

Waikato Waters

Amon Martin
Growth and Planning Interface Lead | Infrastructure - Design & Consenting
M [redacted] E amon.martin@waikatowaters.co.nz
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Disclaimer: This communication, including any attachments, is confidential. If you are not the intended recipient, please delete it and notify us immediately by sending an email or calling.

28 August 2026

South Waikato District Council
Private Bag 7
Tokoroa 3444

SUBMISSION ON PLAN CHANGE 4 TO THE SOUTH WAIKATO DISTRICT PLAN

Please find attached Waikato Waters' submission on Proposed Plan Change 4 to the South Waikato District Plan as proposed by South Waikato District Council.

If you have any questions, please contact amon.martin@waikatowaters.co.nz

Ngā mihi,



Sherryn Paterson

Chief Infrastructure Officer (Acting) | Infrastructure Group

Waikato Waters Limited

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Physical - Level 4, BNZ building, 354 Victoria Street, Hamilton 3204

Submission by Waikato Waters on Proposed Plan Change 4

TO: South Waikato District Council ("**Council**")

SUBMISSION ON: Proposed Plan Change 4: Urban Growth ("**the plan change**")

FROM: Waikato Waters Limited ("**Waikato Waters**")

1. Introduction

Background to Waikato Waters

Waikato Waters is a water services provider established under the Local Government (Water Services) Act 2025. We are a council-controlled organisation under the Local Government Act 2002 owned by the six shareholder councils[1] we service.

Waikato Waters' vision is "Te Mana o Te Wai, Te Mana o Te Tangata – Healthy Water, Healthy People". Our overarching purpose is to make sure people can rely on safe drinking water and that wastewater is managed properly, every day. In delivering these services, Waikato Waters has an interest in ensuring growth is aligned with planning and investment in infrastructure so water services can be provided efficiently, affordably and sustainably over the long term.

Waikato Waters' interest in the plan change

This is a submission on Proposed Plan Change 4: Urban Growth to the Operative South Waikato District Plan. In keeping with Waikato Waters' purpose, the matters raised in this submission relate to the provision of drinking water and management of wastewater in South Waikato.

General

We understand the purpose of the plan change is to provide adequate residential, commercial and industrial land in South Waikato to support Council's 30-year vision of "a thriving community and robust economy that outpaces the rest of NZ". The plan change:

- creates new and amends existing growth cells in the townships of Tīrau, Putāruru and Tokoroa
- identifies land to be set aside as future urban areas, and
- enables a greater density of development in existing residential zoned land across the district.

Waikato Waters is neutral toward the plan change.

Waikato Waters acknowledges the significant work undertaken by South Waikato District Council in preparing Plan Change 4 and the growth planning underpinning it. We

[1] Waikato Waters' shareholding councils are: South Waikato District Council, Waipā District Council, Waitomo District Council, Matamata-Piako District Council, Hauraki District Council and Ōtorohanga District Council.

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further acknowledge the plan change is an important step in planning for the council's future residential, commercial and industrial growth needs over the long term. As such, we emphasise the role Waikato Waters has in the water services infrastructure and the need to ensure alignment in the location, timing and resilience of future water and wastewater infrastructure.

Waikato Waters therefore makes this submission to ensure we are an active party to the plan change process.

Waikato Waters is available and willing to work through the matters raised in this submission and look forward to working collaboratively with council as growth planning and future infrastructure requirements evolve.

Specific parts of the plan change

While this submission relates to the whole plan change in general, comments on specific parts of the plan change are included in **Attachment 1**.

2. Decision sought

Waikato Waters seeks the following relief:

a. That the plan change continues to include objectives, policies, rules and standards that clearly set out the need to ensure development occurs in a co-ordinated way with infrastructure servicing; or

b. Any other alternative means of relief to address the matters raised in this submission.

3. Appearance at hearing

Waikato Waters wishes to be heard in support of this submission.

Waikato Waters will not consider presenting a joint case with other similar submissions at the hearing.

Name: Sherryn Paterson, Waikato Waters Limited

Signature: 

Date: 28 August 2026

Address for service: Waikato Waters Limited
PO Box 144
Waikato Mail Centre 3204

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Print Date: 19 October 2026, 2:48 pm

Contact person: Amon Martin – amon.martin@waikatowaters.co.nz
Growth and Planning Interface Lead
Waikato Waters Limited

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Attachment 1

Issue / provision	Stance	Reasons	Relief sought
Amendments to Part 2 District Wide Matters 6 Matters of Strategic Direction, including: • Amended section 6.1: *Subject to provision of the necessary infrastructure, Tokoroa, Putaruru and Tirau all have the capacity to support increases in population and employment growth …* • New objective UFD-03: ***UFD-O3*** *Ensure new development does not occur until appropriate infrastructure necessary to service the development is in place, including ensuring that sufficient water is available to support future planned growth.*	Support	Waikato Waters' considers it important for the plan change to include wording that clearly sets out the importance of ensuring development occurs in a co-ordinated manner with infrastructure provision.	That the plan change retains the proposed changes (or other similar changes to the same effect) insofar as they recognise the importance of growth occurring in a manner that is co-ordinated with infrastructure provision.
Amendments to Chapter 7.2 Infrastructure, including: • New objective INF-O3: ***INF-O3*** *Ensure subdivision and development with the District's Growth Cells and Future Urban Zones occurs in an integrated and co-ordinated manner so that infrastructure has sufficient capacity to accommodate the form and type of development anticipated.*	Support	Waikato Waters considers it important for the plan change to include wording that clearly sets out the importance of ensuring development occurs in a co-ordinated manner with infrastructure provision. Waikato Waters supports the recognition that infrastructure must have sufficient capacity to accommodate growth and future development. Waikato Waters also considers there may be merit in future	That the plan change retains the proposed changes (or any similar change to the same effect) insofar as they recognise the importance of growth occurring in a manner that is co-ordinated with the planning and efficient delivery of infrastructure.

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Issue / provision	Stance	Reasons	Relief sought
• New policy INF-P15: ***INF-P15*** *Before rezoning future urban zones, require that integrated infrastructure planning is undertaken and infrastructure provision and implementation is coordinated to respond to the anticipated growth demands.*		mechanisms that enable infrastructure capacity to be demonstrated where development generates significant additional demand on reticulated water and wastewater networks. This would assist in ensuring servicing constraints are identified early and that development occurs in a manner that aligns with available infrastructure capacity.	
Amendments to Chapter 7.2 Infrastructure, including: • Amended Policy INF-P2: ***INF-P2*** *Land within the ~~Putaruru~~ District's Growth Cells as defined on the planning maps, will not be developed for urban use until the provision of network utilities and infrastructure to service the land is secured through private developer agreements or other appropriate legal mechanisms.*	Support in part	Waikato Waters supports the intent of INF-P2 in ensuring that infrastructure required to service growth is secured before development occurs. Waikato Waters considers it important that development is responsible for the infrastructure required to service that development, including any upgrades, extensions, relocations, protection works or other modifications required to existing water and wastewater infrastructure assets. Recognition of these principles assists in ensuring growth occurs efficiently, infrastructure investment is sustainably managed, and unintended costs are not transferred to existing infrastructure customers.	Amend INF-P2, or other relevant provisions within Chapter 7.2, to provide greater recognition that infrastructure required to service growth should be appropriately secured, delivered and funded through the development process. Alternatively, provide any other relief that achieves the same outcome.

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Issue / provision	Stance	Reasons	Relief sought
References throughout Plan Change 4 to "WRITS adopted by Council in July 2018" or similar version-specific references.	Support in part	Waikato Waters supports the use of WRITS as the primary engineering standard for development. However, references to a specific historic version of WRITS may create uncertainty as to which version applies at the time of subdivision, land use or engineering approval. Referencing the latest adopted version of WRITS or latest National Engineering Design Standards (NEDS) will provide greater clarity and allow infrastructure standards to evolve over time without requiring consequential plan changes.	Amend references to WRITS to clarify that the latest version adopted by Council, or its successor document (including National Engineering Design Standards), applies.

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