From: "Karla Putt" <karla.putt@stratum.nz>
Sent: Mon, 31 Aug 2026 16:02:01 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Subject: [SCL #240341] Plan Change 4 - Hay and Euro Sports Horses submission
Attachments: 240341-PLN-C004-PC4 submission - Hay & Euro Sport Horses.pdf

Hi,

Please see *attached* submission from P, V & C Hay and Euro Sports Horses to Plan Change 4.
Please provide receipt acknowledgement.

Happy to discuss as required.
Regards,

Stratum CONSULTANTS

KARLA PUTT B.R.S Assoc. MNZPI
Senior Planner
M [redacted]

Trinity House, 1268 Haupapa Street, PO Box 878, Rotorua 3040 **P** [redacted] **WWW.STRATUM.NZ**

The wellness of our people is very important to us. To encourage a better work/life balance for our staff, our offices now close at 12 noon on Fridays.

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240341-PLN-C004

31 August 2026

South Waikato District Council
Private Bag 7
Tokoroa 3420
Email: submissions@southwaikato.govt.nz

Dear Sir/Madam

South Waikato District Plan Proposed Plan Change No.4 – Submission
Peter, Vicki & Claudia Hay and Euro Sport Horses – 242 Maraetai Road, Tokoroa

1. Introduction

Stratum Consultants Ltd has been engaged to act on behalf of Peter, Vicki & Claudia Hay and Euro Sport Horses ("the submitter's"). The submitters wish to submit to the South Waikato District Council Plan Change 4.

The submitter's land is 242 Maraetai Road, Tokoroa, legally described as Part Lot 1 DP 32554 and is 10.42ha in size. The submitters own and operate Euro Sport Horses from the subject site. Euro Sport Horses is the largest sport horse stallion station in New Zealand with their top stallion currently ranked 26th in the World eventing breeding rankings. The Euro Sport Horses facility has been specifically designed and constructed for stallion agistment, breeding, and training for high level competition. Considerable site investment has occurred, resulting in the achievement of six NZ titles in Show Jumping. Euro Sport Horses is an established and respected facility in New Zealand and internationally.

We welcome the opportunity to discuss the contents of the submission with relevant Council officers as required. The submitter's are willing to work with Council in advance of any Hearing.

1.1. Address for Service

P, V & C Hay and Euro Sport Horses
C/- Stratum Consultants Ltd
PO Box 878
Rotorua 3040

Attention: Karla Putt
Email: karla.putt@stratum.nz
Phone: [redacted]

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1.2. Trade Competition

The submitters could not gain an advantage in trade competition through this submission.

1.3. Attendance at Council Hearing

The submitters wish to be heard at, and attend any hearing, including any pre-hearings.

If others make a similar submission, the submitter's may consider presenting a joint case at a Hearing.

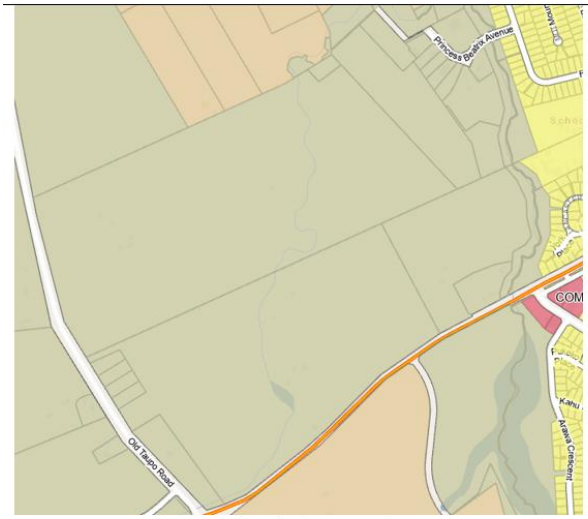
2. Background

Tokoroa Land Holdings Ltd approached Council about their property at 292 Maraetai Road. They requested that Council consider re-zoning this property from General Rural to General Residential under the Proposed District Plan Change. Their proposal would affect 38ha of land at the corner of Maraetai Road and Old Taupo Road. Re-zoning would allow the property to be subdivided into residential sections.

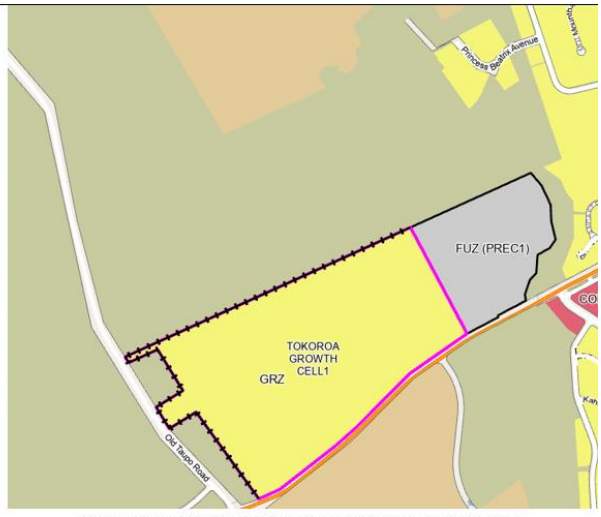
We understand the submitter's have had meetings and discussions with Council staff with regard to their concerns around the proposed rezoning of land on Maraetai Road, Tokoroa.

Our clients are in complete opposition to 292 Maraetai Road being rezoned to Residential. Preliminary feedback to Council was provided by the submitter's on these matters by way of a letter dated 27th August 2025.

For clarity, the following image shows the operative and proposed rezoning:



Operative District Plan Zoning



Princess Beatrix Ave rezone from general rural to residential,
Tokoroa Growth Cell 1 (Maraetai Rd North) – general rural zone to residential zone
Tokoroa Residential Future Urban Zone 1 (234 and 242 Maraetai Rd) – general rural zone to future urban zone

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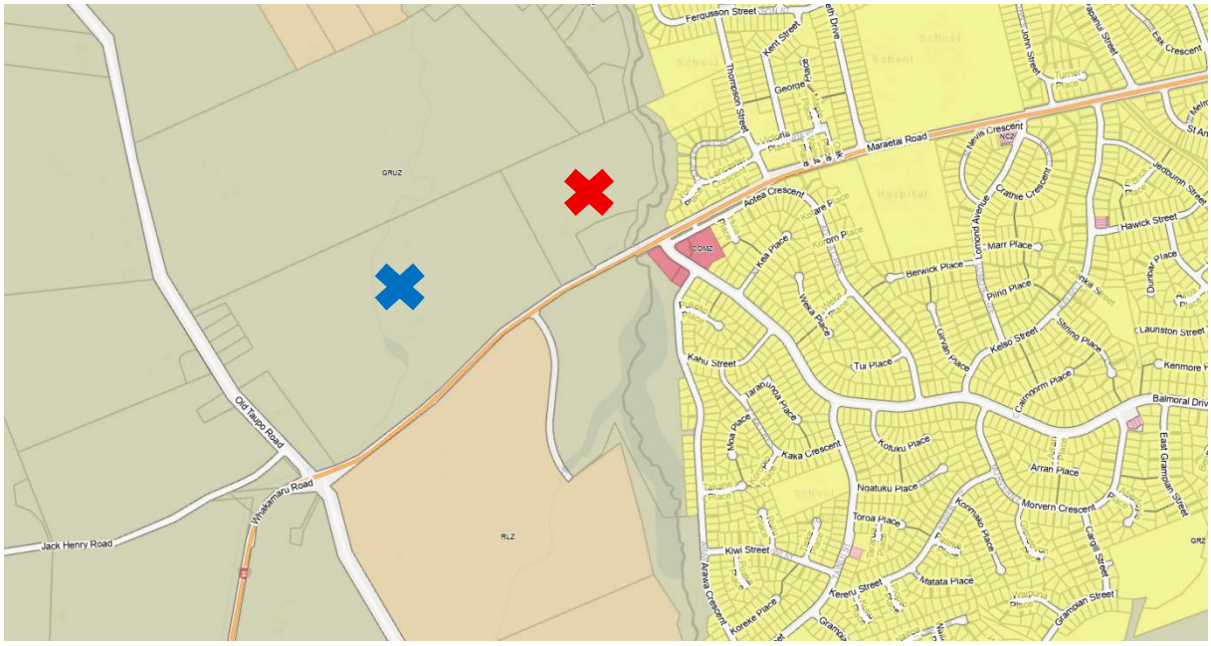
3. Submission

3.1. Zoning

The current zoning is shown on the following image, where the red cross is our clients land and the blue cross showing the proposed residential land:



3.1 As illustrated in the image above, the proposed rezoning of 292 Maraetai Road to Residential would result in the creation of a 38-hectare isolated pocket of Residential zoned land. This area would be entirely disconnected from the existing residential zone located to the east within the Tokoroa township. A rezoning of this scale, potentially enabling the development of up to 500 new dwellings, raises significant concerns regarding spatial planning, urban form, and development sequencing. The isolated nature of the rezoning proposal is inconsistent with principles of integrated and sustainable urban growth.

3.2 292 Maraetai Road is completely surrounded by Rural-zoned land on all sides. The rezoning of this land to Residential is indicative of uncoordinated urban sprawl, which is widely recognised as an inefficient use of land and natural resources. Furthermore, such an isolated residential node would impose significant inefficiencies and costs on Council infrastructure and service delivery. There are sufficient alternative locations for future and additional residential zoned land including at Richmond Avenue and Princess Beatrix Avenue in Tokoroa, or in Putaruru to achieve the SWDC growth requirements that will not affect an existing international equine breeding facility. The proposal lacks any evident connection to a broader strategic planning framework and does not align with best practice in land use integration.

3.3 A clay target shooting range has operated at 292 Maraetai Road. In accordance with the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) the site is considered a HAIL activity C2. The submitters

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consider that soil disturbance for any clay target activity remediation will contribute to mobilising toxic, microscopic lead dust into 242 Maraetai Road and adjoining properties, directly threatening the health, reproductive safety, and financial value of the Euro Sport Horse elite international breeding stallions and bloodstock.

3.4 The proposed rezoning would have a direct and detrimental impact on our client's established rural business operations, which involve the breeding of stallions, a land use that is particularly sensitive to the encroachment of incompatible neighbouring activities. These activities would include fireworks or excessive noise that would spook animals, wood burning fires that would create localised smog/smoke that could affect animals, and rubbish that would affect the submitter's existing farming operations. The introduction of residential development in such proximity to noise-generating rural activities also presents an immediate conflict in land use expectations.

3.5 While our clients acknowledge that existing use rights under the Resource Management Act would continue to apply, there remains a legitimate and serious concern about the likelihood of complaints from future residential occupants. These complaints could affect the day-to-day operations, reputation, and long-term viability of their business. It is well documented that reverse sensitivity effects often result in pressure being placed on lawful rural activities to curtail operations, even when established prior to the encroaching development. Objections to standard and necessary equine operations including stallion vocalization, early morning machinery operation, dust, stable odours, and chemical pasture management, will directly threaten the viability of the high-value export business undertaken by the submitters.

3.6 The submitters consider that alternative land holdings within the SWDC and Tokoroa area that are better suited to residential development than 292 Maraetai Road which do not contain a wetland (both NES-FW and NPS-FW restrictions/standards will apply), cell phone tower or clay target club activities that limit the future use and enjoyment of the land. The economic requirements to facilitate a complying residential development of the land will result in a staged and isolated development from the established Tokoroa urban area. Therefore, the submitters consider that retention of farming of 292 Maraetai Road is preferable.

3.7 On this basis, the submitter's stance is of strong opposition to the proposed rezoning of 292 Maraetai Road to Residential. The proposal is inconsistent with sound urban planning principles and poses significant adverse effects on surrounding rural land uses, particularly those involving sensitive agricultural activities, in this case, horse rearing.

3.8 Furthermore, the proposed Future Urban Zoning (FUZ) on the submitter's land (242 Maraetai Road) is also not supported.

3.9 The PC4 s32 report states that of the proposed FUZ areas "*It has been determined that these areas should not be re-zoned immediately as while the land is needed to satisfy*

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demand within a 30 year period; it is not required within the short or medium term. Accordingly, PC4 proposes that the FUZ should be applied to these locations for provide for growth demand in the long term."

3.10 The s32 states that the benefits of the FUZ are:

- "preventing premature subdivision and development from compromising the eventual efficient development of greenfield land;
- maximising future capacity of greenfield land and infrastructure;
- minimising the environmental effects of eventual urban development, including reverse sensitivity;
- supporting current rural activity; and
- giving effect to the Growth Plan, WRPS and the NPS-UD.

The policy approaches proposed create short and medium-term costs in terms of subdivision, development and opportunity costs for landowners. There are also social costs of restricting interim housing development."

3.11 Furthermore, the s32 states that "*In summary, there are some moderate economic and social costs in the form of land use restrictions, but that these costs are considered strongly outweighed by the various benefits of achieving a well-planned and orderly transition of these growth areas from rural to urban land use.*"

3.12 The submitter's agree that the FUZ approach creates immediate short term and moderate term costs for land use and subdivision development and potential opportunity costs for landowners, not SWDC. Therefore, for these reasons the submitter's request that their land is "live" zoned (either Rural or Residential) with immediate effect, to negate the need for additional plan changes or non-complying resource consents.

3.13 The proposes FUZ zoning does not allow immediate development potential and requires a further plan change to enable development. This is considered cumbersome and costly. The submitter's seek to understand when SWDC would facilitate the FUZ to "live" zoning; if there are any triggers preventing "live" zoning now.

3.14 The submitter's consider that it is unnecessary to set up a parallel planning framework for FUZ when the land could be made "live" now. Ultimately it is the economic market and landowners desire to undertake development on their own land.

3.15 However, should Council proceed with the rezoning of 292 Maraetai Road to Residential (or Future Residential), we submit that 242 Maraetai Road must also be considered for the exact same zoning. Applying consistent zoning would at least ensure equitable treatment of landowners and offer a more coherent approach to future land use planning in the area.

3.2. Relief Sought – Zoning

The following relief is sought:

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1. Retain the existing Rural zoned land at 242 and 292 Maraetai Road. There are sufficient alternative locations for future and additional residential zoned land including at Richmond Avenue and Princess Beatrix Avenue in Tokoroa, or in Putaruru to achieve the SWDC growth requirements that will not affect an existing international equine breeding facility.

If retention of the existing Rural zoned land is not able to be achieved, then;

2. Re-zone both 242 and 292 Maraetai Road as 'live' Residential (or future Residential) zones. Different zones on these two properties is not supported.

Furthermore, if the district planning maps are retained as notified, the submitter's request the following specific restrictions/conditions placed on 292 Maraetai Road residential zoned land:

3. No excessive noise activities including fireworks are permitted.
4. No wood burner fires permitted.
5. A close-boarded or mesh fence be erected along the entire length of the common boundary between the two properties, being 242 and 292 Maraetai Road.
6. Measures to protect the submitters land and activity from the potential remediation of soils associated with the clay target activity.
7. No complaints reverse sensitivity requirements on any resulting titles to the submitters legitimate activities.

3.3. FUZ Activities

3.31 The submitter's support the ability for existing activities including primary production to be undertaken in the FUZ zones. "*It is proposed that primary production and other activities permitted in the GRUZ can continue in the FUZ*".

3.32 However, the submitter's do not support the proposal for the range of activities to be narrower than for the GRUZ if the FUZ is adopted. The subject land is zoned General Rural (GRUZ)). The s32 states that "*The range of activities in the FUZ is proposed to be narrower than for the GRUZ, again ruling out activities that would be incompatible with longer-term residential or industrial use. An example is indoor intensive primary production. Such activities would become non-complying. More than one residential unit per site would also be a non-complying activity.*"

3.33 The submitter's do not support the constraint of land use activities for FUZ land, specifically the number of residential units and other permitted rural activities in GRUZ-R1(1) to (25). The need to undertake future developments without undue resource consents and assessment is sought.

3.34 In addition, we note that the proposed Resource Management Reform Phase 2 National Direction seek to remove non-complying activities and therefore proposed activity status should align with the proposed reform bills.

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3.4. Relief Sought – FUZ Activities

Given the above, if the FUZ is adopted, the relief sought is for the following Rules/Standards are amended (or deleted) as follows:

1. Amend FUZ-R1(9) to allow the number of residential units in accordance with the underlying zones.
2. Amend FUZ-R1 to include permitted activities of GRUZ-R1(1) to (25).
3. Delete all references to non-complying activities in PC4 in accordance with National Planning Standards.

4. Closure

The submitter's wish to retain an active participant to this specific District Plan change process and look forward to being involved in any future consultative process in due course. We would be happy to meet with Council officers to further explain the above should you wish.

Otherwise, should you have any queries regarding this matter, please do not hesitate to contact the undersigned.

Yours faithfully

Stratum Consultants Ltd



Karla Putt

Senior Planner

cc. P, V & C Hay eurosporthorses@hotmail.com

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