From: "Karla Putt" <karla.putt@stratum.nz>
Sent: Tue, 1 Sep 2026 13:53:49 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Subject: [SCL #239087] Plan Change 4 - WaiTerra Estate Ltd submission
Attachments: 239087-PLN-C038-WaiTerra PC4 submission.pdf

Hi,

Please see *attached* submission from WaiTerra Estate Limited 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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239087-PLN-C038

1 September 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
WaiTerra Estate Limited – 2220 SH 1, Putaruru

1. Introduction

Stratum Consultants Ltd has been engaged to act on behalf of WaiTerra Estate Limited (WaiTerra). WaiTerra is the development agency of Aanzien Limited (Aanzien), the landowners of 2220 SH 1, Putaruru. WaiTerra wish to submit to the South Waikato District Council Plan Change 4.

We welcome the opportunity to discuss the contents of the submission with relevant Council officers as required. WaiTerra is willing to work with Council in advance of any Hearing.

1.1. Address for Service

WaiTerra Estate Limited
C/- Stratum Consultants Ltd
PO Box 878
Rotorua 3040

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

1.2. Trade Competition

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

1.3. Attendance at Council Hearing

WaiTerra wishes to be heard at, and attend any hearing, including any pre-hearings.

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If others make a similar submission, WaiTerra may consider presenting a joint case at a Hearing.

2. Background

WaiTerra are currently developing Aanzien land located at 2220 SH 1, Putaruru. The Aanzien owned sites are legally described as:

Legal Description	Record of Title (RT)	Area (in hectares)
Lot 3 DP 573188, Lots 1 & 2 DPS 76668	1042915	72.67ha
Lot 1 DP 573188	1042913	1.00ha
Lot 2 DP 573188	1042914	1.12ha



Figure 1: Location plan of Aanzien owned properties

Also including within this submission is the land owned by Hughson Holdings Limited (Hughson), legally described as Lot 3 DPS 76668 (RT: SA60D/993) and contains 3.26ha. This land has been considered by WaiTerra as part of the future development of the southern Putaruru, Growth Cell 4 extension.

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Figure 2: Location plan of Hughson owned property

WaiTerra (and Aanzien) have had discussions with Council staff regarding the further development potential beyond Growth Cell 4 including the rezoning of land to the south and southwest of Growth Cell 4.

Private Plan Change 6 (PPC6) approved in February 2026 facilitated the transfer of General Residential zoned land from the south of the site to be relocated to the end of Totara Street, and the realignment of the Commercial zone and General Rural zone boundary to align with proposed development design and topography.

This submission seeks to enable continued development of the subject land in accordance with the existing and proposed District Plan provisions. The current District Plan zoning of the properties are Commercial Zone (Growth Cell 4) (COMZ), General Rural zone (GRUZ), Rural Lifestyle zone (RLZ) and General Residential zone (GRZ) and is shown in Figure 3.

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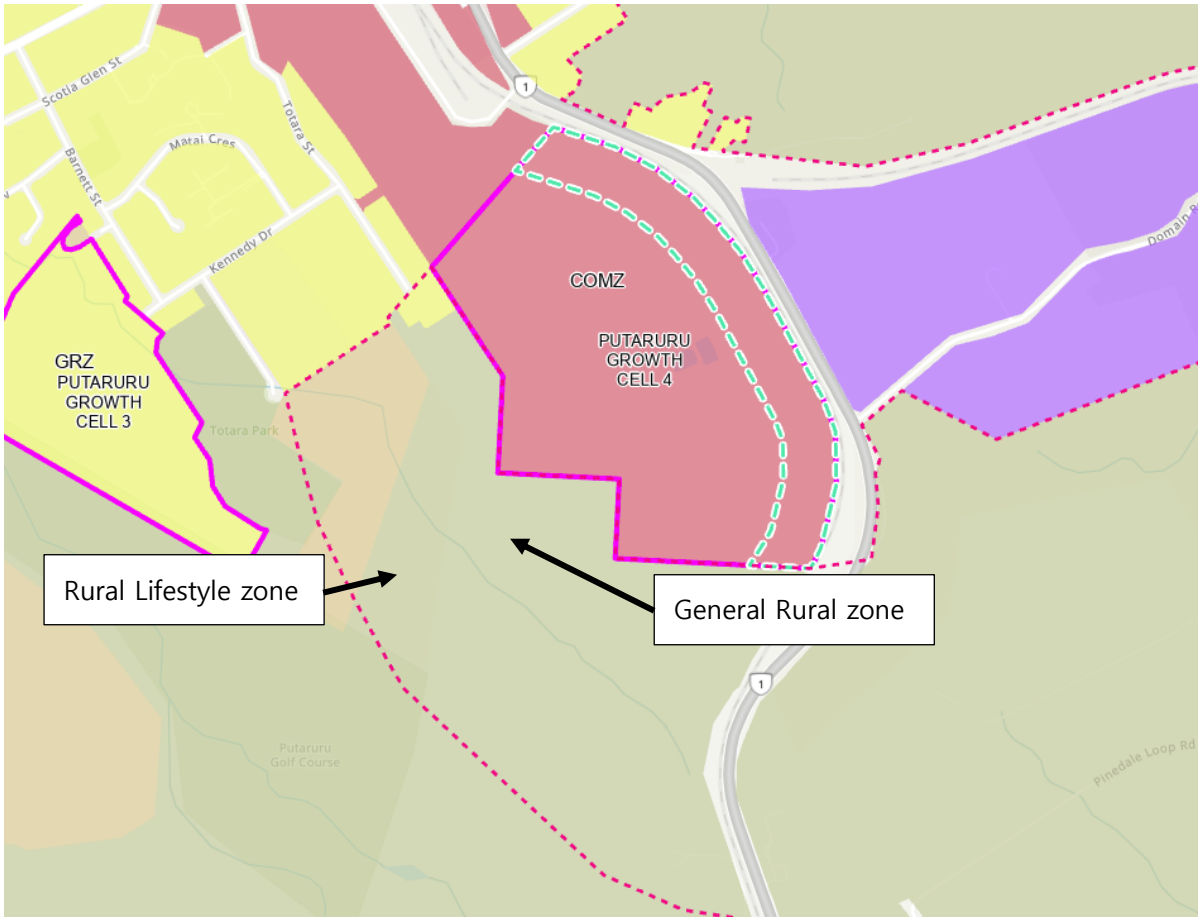


Figure 3: SWDC District Plan zones (taken from SWDC Intramaps)

2.1. Existing Plan Drafting Error

We note that the current online mapping is incorrect as it does not address the approved PPC6 s32AA report zoning boundary change submitted on 18 December 2025 to reflect the agreed and approved stormwater management of the subject site. These planning map changes were approved by Council on 29 January 2026. Figure 4 shows the requested and approved minor change to the COMZ and GRUZ boundary sought by the s32AA to PPC6.

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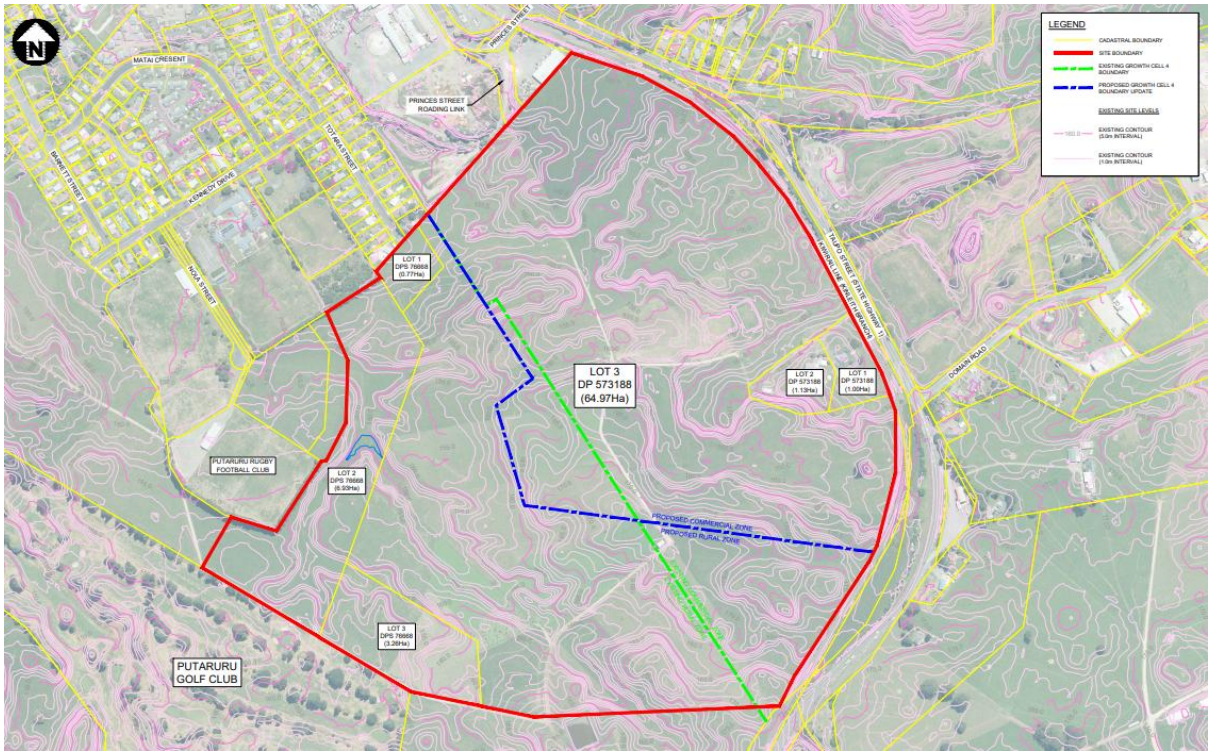


Figure 4: s32AA agreed zoning amendment, where proposed new boundary alignment in blue compared with (former) operative in green.

Relief sought: As a starting point, the SWDC planning maps should accurately reflect the s32AA request and approval as shown above.

3. Submission

3.1 WaiTerra supports growth and development within the SWDC district for the short, medium and long term. WaiTerra considers that development will enable environmental and economic benefits for the SWDC community. WaiTerra generally supports the intent of the PC4 however have specific matters that require SWDC consideration.

Proposed Zone Changes

3.2 PC4 proposes a Future Urban zone (FUZ) and applies it to the subject land as shown in Figure 5.

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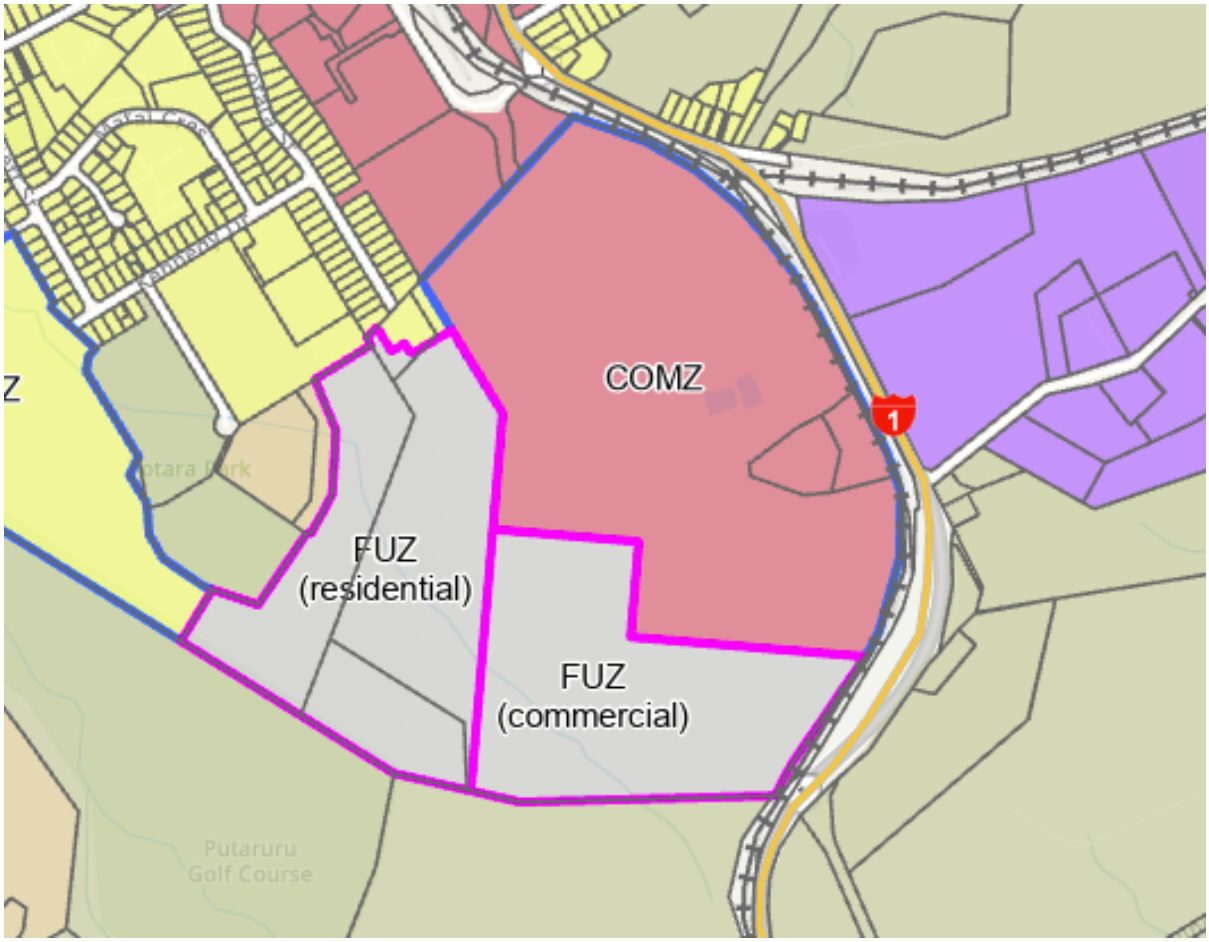


Figure 5: PC4 Urban Growth – Areas Proposed to be Rezoned – Putaruru

3.3 In respect to the National Policy Statement for Highly Productive land (NPS-HPL) the s32 states that [1] *"Western half of the land is currently zoned rural lifestyle, so the NPS-HPL is not relevant to that area. Land is part of a dairy farm, 40 ha of which is currently zoned commercial zone so long-term farming viability of the remainder of the land holding is in question. Noting again the FUZ does not allow rezoning without a plan change so technically the land retains its productive capacity and remains in use as land-based primary production."* WaiTerra does not consider it appropriate to defer NPS-HPL assessment for subsequent plan changes as this is disingenuous to the overall aspirations being sought by both SWDC and the submitter. Section 3.6 of the NPS-HPL provides for urban rezoning of Class 3 land where the rezoning is required to meet demand for housing and business land.

3.4 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 demand within a 30 year period; it is not required within the short or medium term.*

[1] SWDC PC4: Urban Growth Section 32 Evaluation Report June 2026, pg 16, Table 3

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Accordingly, PC4 proposes that the FUZ should be applied to these locations for provide for growth demand in the long term."[2]

3.5 WaiTerra disagrees with this statement and seeks immediate 10.56ha of 'live' residential immediately for short short-term benefit and demand (in addition to existing 0.75ha GRZ at end of Totara Street). A total of 30.7ha 'live' residential zone and 7.37ha commercial zone is sought as shown in Figure 6 below.

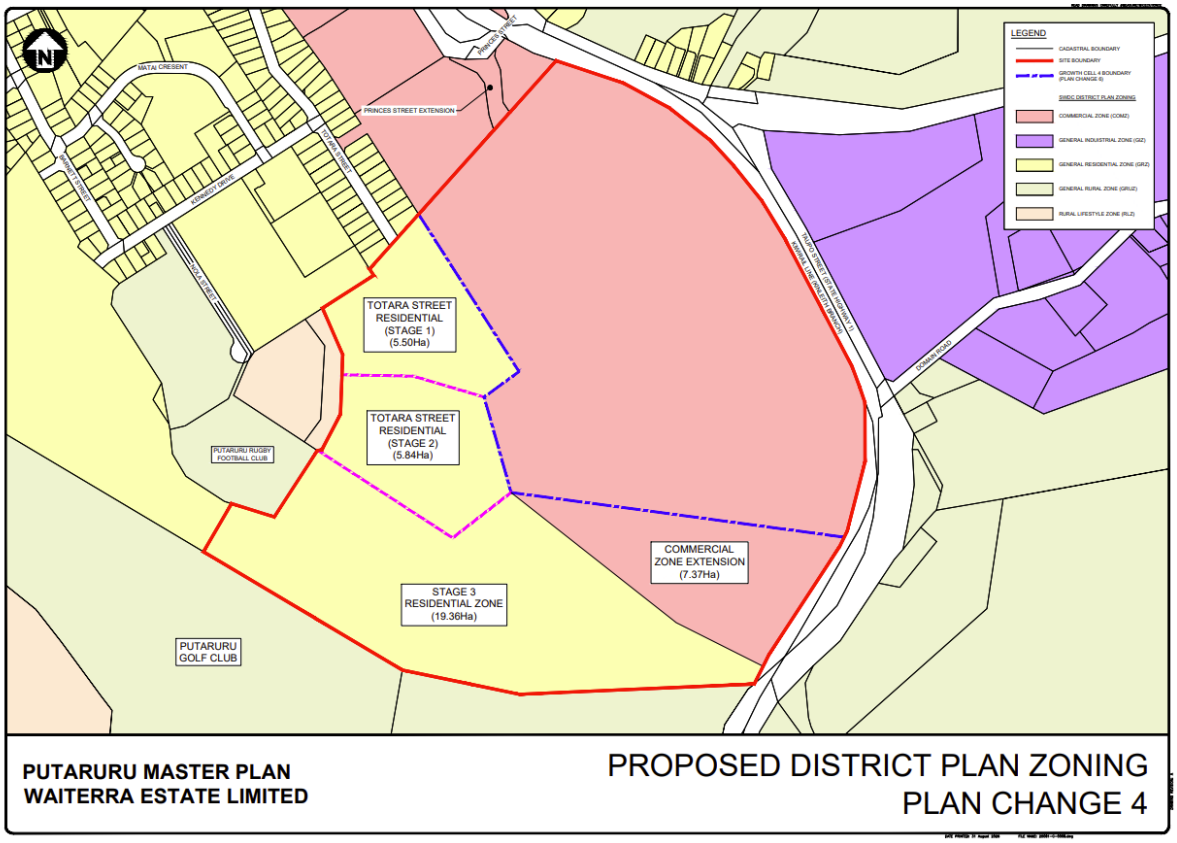


Figure 6: WaiTerra Proposed Areas to be Rezoned

3.6 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.

[2] Ibid., pg 24, para 7

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> 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]

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*."[4]

3.7 WaiTerra 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 WaiTerra requests that the land is 'live' zoned with immediate effect, to negate the need for additional plan changes or non-complying resource consents.

3.8 WaiTerra does not support the FUZ where there is a risk for ad hoc, piecemeal or disconnected development. WaiTerra has provided SWDC with Master Plans for the potential development of the subject land and considers that this demonstrates that forward planning including land use connectivity will result. 'Live' zoning is sought.

3.9 The proposed FUZ zoning does not allow immediate development potential and requires a further plan change to enable development. This is considered cumbersome and costly. WaiTerra seeks to understand when SWDC would facilitate the FUZ to 'live' zoning; and, if there are any triggers preventing 'live' zoning now.

3.10 WaiTerra submits that it appears 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.

3.11 Given the above (including in Section 2.1), WaiTerra seeks the following relief:

1. The immediate correction of planning maps to reflect PPC6 s32AA approval.

Then;

2. Make 'live' GRZ zoning of 29.95ha extending from Totara Street GRZ into the site (total excludes 0.75ha of existing GRZ at end of Totara Street).

Or,

3. Make all proposed FUZ residential, "live" GRZ zone (30.7ha), and all proposed FUZ commercial zone, "live" COMZ zone (7.37ha).

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[3] Ibid., pg 25, para 4

[4] Ibid, pg 69, Table 21, column 2

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3.12 The notified zoning all of the subject land FUZ residential is not supported as it will not meet short term aspirations of submitter.

FUZ Activities

3.13 WaiTerra 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*"[5]. However, the current ability for "*The storage, treatment, piping and spreading of agricultural effluent including dairy factory liquid by-products and wastes as a fertiliser and/or for irrigation purposes*" provided by GRUZ-R1(19) and RLZ-R1(11) are not provided for.

3.14 However, WaiTerra does not support the proposal for the range of activities to be narrower than for the GRUZ if FUZ is adopted. The subject land is zoned General Rural (GRUZ) and Rural Lifestyle (RLZ). 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.*"[6]

3.15 WaiTerra does not support the constraint of land use activities for FUZ land. The need to undertake future developments without undue assessment is sought. In addition, we note that the proposed Resource Management Reform Phase 2 National Direction seek to remove Non-complying activities[7] and therefore proposed activity status should align with the proposed reform bills.

3.16 The s32 states that there is a need to ensure that subdivision of FUZ land does not compromise the development potential of the land and that "*New policies address the risk that subdivision might compromise the ability for the land to later be developed in an efficient way. This risk is to be managed by making all subdivision in the FUZ non-complying activities, except for subdivision for network utilities and minor boundary adjustments*".[8]

This results in all subdivisions being non-complying which is constrained by any future plan change to change the land from FUZ to a 'live' zoning of GRZ or COMZ. Furthermore, please see previous comment regarding alignment of non-complying activity status with RMA Reforms.

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[5] Ibid., pg25, para 1

[6] Ibid.,, pg 25, para 2

[7] https://environment.govt.nz/publications/better-planning-for-a-better-new-zealand/#resetting-what-is-regulated

[8] SWDC PC4: Urban Growth Section 32 Evaluation Report June 2026, pg 25, para 3

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

- FUZ-R1(9) to be amended to allow the number of houses in accordance with the underlying zones.
- FUZ-R1 to include permitted activities of GRUZ-R1(1) to (25) and RLZ-R1(1) to (14).
- Delete all references to non-complying activities in accordance with National Planning Standards.
- Amend SUB-R1(5) to make clear that subdivision in FUZ is controlled activity, and delete reference to Discretionary FUZ.

Water and Wastewater Servicing Considerations

3.18 PC4 seeks to increase the number of Household Unit Equivalents of demand (HUEs) for each growth cell[9], however no increase has been provided to Growth Cell 4 or FUZ areas. WaiTerra considers it disingenuous of SWDC to facilitate additional development if the development cannot be supported by additional HUE or appropriate servicing.

3.19 WaiTerra requests that additional HUE are provided to the FUZ land (GRZ and COMZ). Furthermore, WaiTerra understands that the Putaruru Wastewater Treatment Plant is currently at or nearing capacity and therefore the merit of any development applications is questionable. Furthermore, WaiTerra considers that any rezoning should be supported by robust infrastructure options and solutions.

Chapter 7.3 Transport Chapter

3.20 Proposed Rule TRAN-R3(2) requires a consent for activities locating within 10m of an indicative road in FUZ zones.

3.21 WaiTerra opposes this requirement as DAPs are not shown in District Plan so future developers will not know what is an approved DAP, or if DAP plans have changed, which creates additional barriers and costs for development. Any proposed development within FUZ is non-complying anyway.

Chapter 11 Subdivision Chapter

3.22 Proposed Rule SUB-R3(6) introduces all subdivision in FUZ to be a discretionary activity even if compliance with all standards is achieved.

WaiTerra oppose discretionary activity status and submit that activity status should be controlled, as discretionary status is restrictive and not enabling growth.

3.23 Proposed Rule SUB-R5(1)(a)(i) introduces a maximum lot size of 2,000m^2 in the GRZ.

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[9] Ibid., pg 28, para 3

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WaiTerra oppose this rule as it does not allow for balance land parcels within a staged subdivision that exceed 2,000m^2.

Commercial Zone Office Rules

3.24 Currently Putaruru Growth cell 4 provides as Controlled activities "*Industrial activities except those listed in SCHED5-HIIA*" which enables a wide range of industrial uses. However, there is considered to be two significant impediments to development of GC4 being:

i) No permitted activities provided. Therefore, controlled activity status provides SWDC consent processing staff with the ability to undertake rigorous assessment of all District Plan chapters although the heart of the assessment should be directed to AA-R2(1)(c) which is specific to the overall intent of GC1 being:

(c) In assessing applications for controlled activities within Putaruru Growth Cell 4 shown on the Planning Maps, the matters in respect of which Council has reserved its control are:

(i) The degree to which the activity would contribute to a cumulative increase in vehicle movements to and from GC4 at the Princess St/SH1 intersection at peak hours, as indicated by an Integrated Traffic Assessment prepared for the activity,

(ii) The degree to which the activity would contribute to a cumulative increase in vehicle movements to and from GC4 at the Princes St/SH1 Intersection at peak hours, as indicated by an Integrated Traffic Assessment prepared for the activity,

(iii) Impacts on the safe and efficient functioning of the road network, Measures proposed to mitigate any adverse effects on the Princes St/SH1 intersection,

(iv) The availability of sufficient water and wastewater infrastructure including water supply for firefighting in accordance with the NZ Fire Fighting Water Supplies Code of Practice (SNZ PAS 4509:2008), to service future subdivision and/or development throughout Putaruru, including in the residential Growth Cells identified by this Plan.

(v) The design and location of the legal road providing access to Princes Street shown as Possible Future Road on the Planning Maps where this has not already been vested in Council.

Relief sought: Make all activities within COMZ GC4 permitted with rules to give effect to AA-R2(1)(c). If the rules cannot be complied with, only then should trigger the controlled activity status.

ii) Ancillary offices are capped at 50m^2 and that any exceedance requires resource consent. For the proposed WaiTerra development the lots are in excess of 1.0ha and resulting businesses are highly likely to require a larger office area. Whilst it is understood that the 50m^2 cap limits office activities and that SWDC wishes to direct large scale office activity to the Town Centre zone (TCZ), it is considered more

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effective to use a percentage of Gross Floor Area (GFA) for the commercial activities to manage the ancillary office activity.

WaiTerra requests that Rule COMZ-R2(2) is amended to (shown as ~~**strikethrough**~~ and **underlined**):

(c) The GFA of this *office* and *retailing* space shall together:

(i) Not exceed ~~**10%**~~ **25%** of the GFA used for **commercial or** industrial purposes on the same *site*

~~**(ii) Not exceed 50 m² in GFA**~~

~~**Whichever is lesser**~~

Commercial Zone Landscaping Rules

3.25 Rule COMZ-R6(2)(a) requires that planting and screening of 2.0m width is provided along the site boundary that adjoins a road with the exception of access points.

It is considered that 2.0m planting strips along extensive lengths of road frontages are difficult to maintain, become unauthorised parking areas, and that significant block planting may cause ongoing security issues (lack of passive surveillance) to future lots and resulting land use activities. The approved stormwater swales for Stage 1 of the WaiTerra subdivision provide combined amenity and stormwater management. The benefits of street trees and swales provide visual interest, shade, habitat for indigenous insects and bird life and improve the environment by absorbing, filtering and purifying the basic elements of air and water as well as softening the harshness of what will be an urban industrial environment.

3.26 WaiTerra seeks deletion of Rule COMZ-R6(2)(a) in its entirety as it affects GC4.

4. Relief Sought

In summary, WaiTerra seeks the following relief:

1. Online maps: Immediate correction of planning maps to reflect PPC6 s32AA zoning approval.
2. Make 'live' zoning of GRZ land.
3. Proposed FUZ-R1(9): Amend FUZ-R1(9) to allow the number of residential units in accordance with the underlying zones.
4. Proposed FUZ-R1: Amend FUZ-R1 to include permitted activities of GRUZ-R1(1) to (25) and RLZ-R1(1) to (14).
5. Delete all references to non-complying activities in PC4 in accordance with National Planning Standards.
6. Rule SUB-R1(5): Amend SUB-R1(5) to make clear that subdivision in FUZ is a Controlled activity, and delete reference to Discretionary FUZ.
7. Provide additional HUE for subject land.
8. Demonstration of proposed SWDC infrastructure and servicing to support rezoning.
9. Proposed Rule TRAN-R3(2): Delete proposed rule TRAN-R3(2) in its entirety.

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10. Proposed Rule SUB-R3(6): Change activity status from Discretionary to Controlled.
11. Proposed Rule SUB-R5(1)(a)(i): Delete proposed rule SUB-R5(1)(a)(i) in its entirety.
12. Rule COMZ-R1: Delete reference to Growth Cell 4 in its entirety and include criterion of AA-R2(1)(c) into 'Subject to' column.
13. Rule COMZ-R2: New rule that identifies that where activity and performance standard compliance not achieved for COMZ-R1, then is provided as controlled activity within COMZ-R2.
14. Rule COMZ-R2(2): Delete reference as controlled activity. Amend performance standard in accordance with submission comment 3.24 ii) above.
15. Rule COMZ-R6(2)(a): Delete rule in entirety as it relates to Growth Cell 4.

5. Closure

WaiTerra 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. H van der Heyden and WaiTerra

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