From: "Karla Putt" <karla.putt@stratum.nz>
Sent: Tue, 1 Sep 2026 13:55:48 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Subject: [SCL #239087] Plan Change 4 - Hughson Holdings Ltd submission
Attachments: 239087-PLN-C039-Hughson PC4 submission.pdf

Hi,

Please see *attached* submission from Hughson Holdings 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.

DISCLAIMER: This communication is intended for the use of the addressee(s) and may contain legally privileged and confidential information. If you are not the intended recipient any use, disclosure or copying of this e-mail is unauthorised. If you have received this e-mail in error please notify the sender immediately by reply e-mail and permanently delete this e-mail. Stratum Consultants Ltd is not responsible for any changes made to this message and/or any attachments after sending. We use virus-scanning software but exclude liability for any loss or damage that may result from the presence of viruses in the message or attachments.

239087-PLN-C039

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
Hughson Holdings Limited – 2220 SH 1, Putaruru

1. Introduction

Stratum Consultants Ltd has been engaged to act on behalf of Hughson Holdings Limited (Hughson). Hughson are the landowners of 2220 SH 1, Putaruru. Hughson 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. Hughson is willing to work with Council in advance of any Hearing.

1.1. Address for Service

Hughson Holdings Limited
C/- Stratum Consultants Ltd
PO Box 878
Rotorua 3040

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

1.2. Trade Competition

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

1.3. Attendance at Council Hearing

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

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

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

2. Background

In conjunction Aanzien Limited and WaiTerra Estate Limited, Hughson are currently developing the Aanzien and Hughson 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.

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm



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.

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

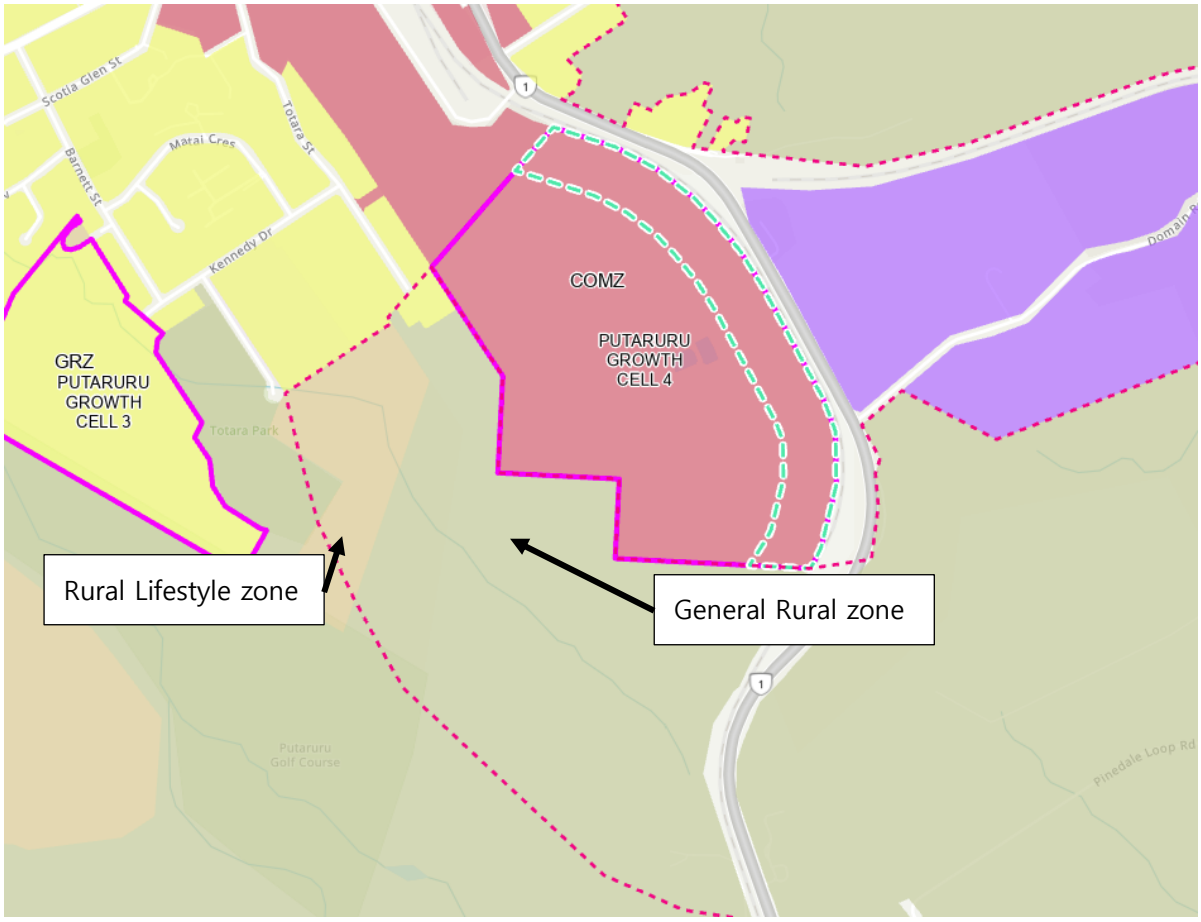


Figure 3: SWDC District Plan zones (taken from SWDC Intramaps)

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.

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

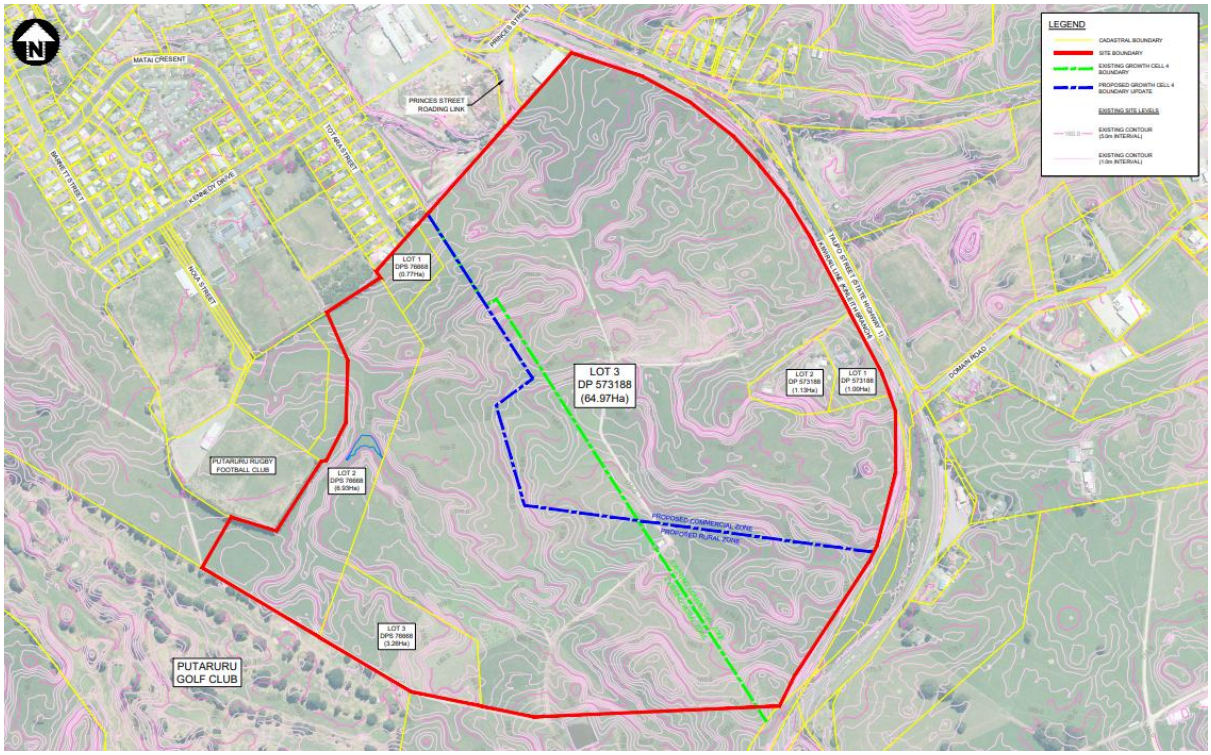


Figure 4: s32AA agreed zoning amendment, where proposed new boundary alignment in blue compared with (former) operative in green.

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 Hughson supports growth and development within the SWDC district for the short, medium and long term. Hughson considers that development will enable environmental and economic benefits for the SWDC community. Hughson 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.

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

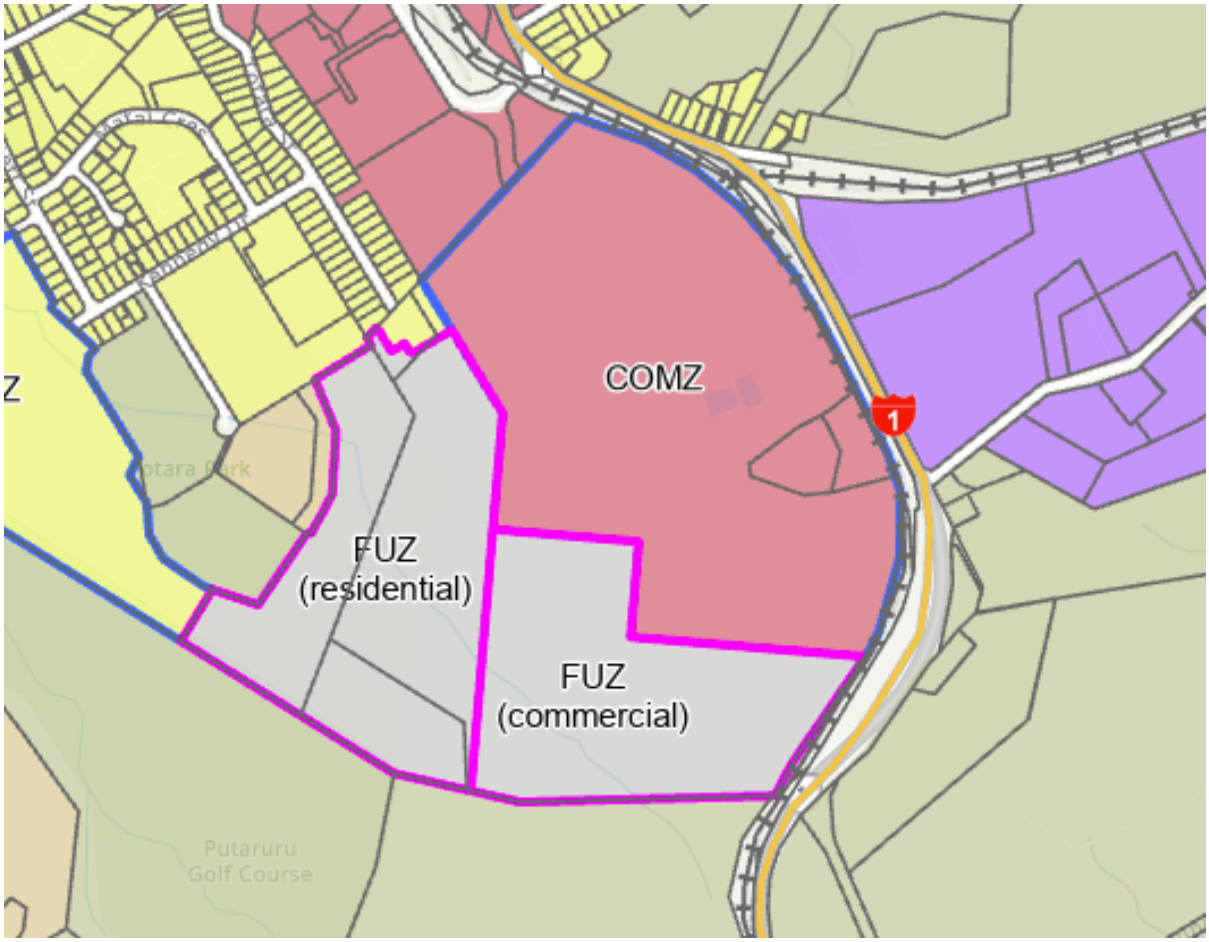


Figure 5: PC4 Urban Growth – Areas Proposed to be Rezoned – Putaruru

3.3 Hughson 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.

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

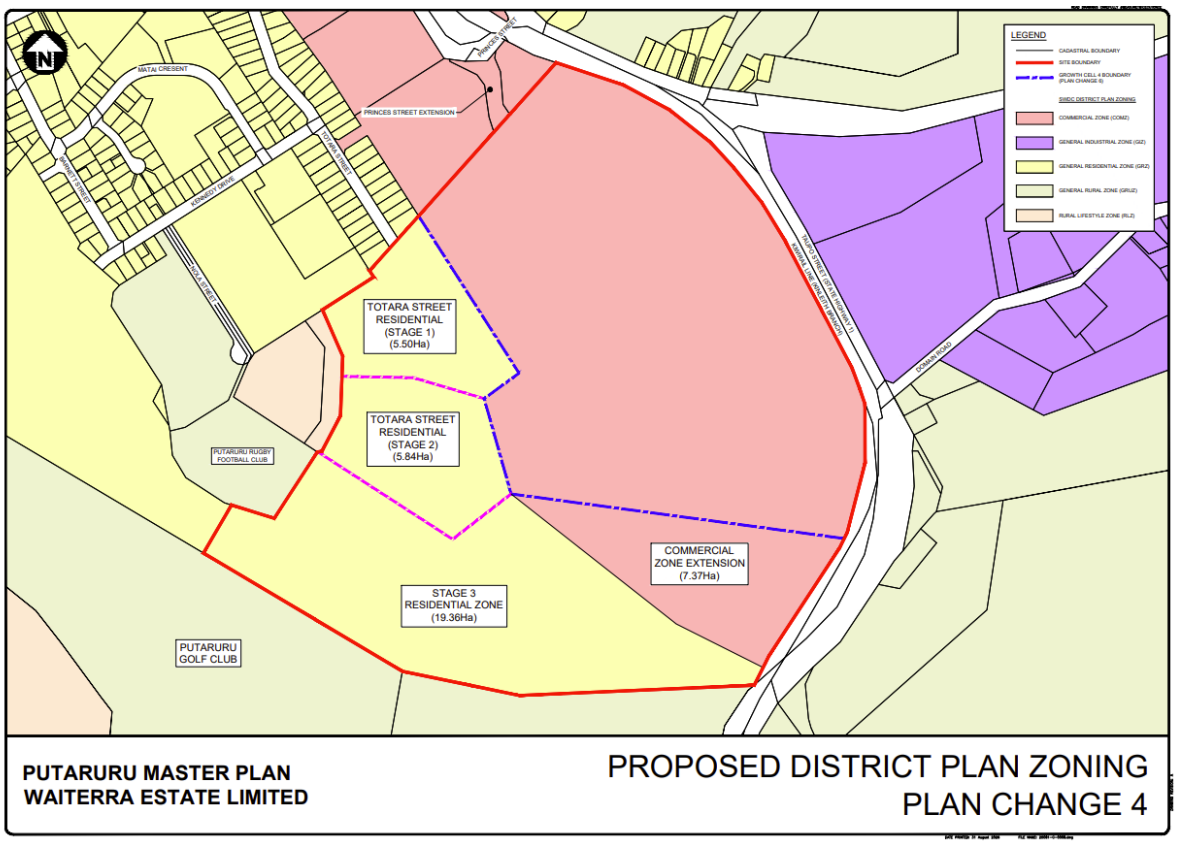


Figure 6: Aanzien and Hughson Proposed Areas to be Rezoned

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.

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."[1]

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.*"[2]

[1] Ibid., pg 25, para 4

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

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

3.7 Hughson 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 Hughson 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 Hughson does not support the FUZ where there is a risk for ad hoc, piecemeal or disconnected development. Hughson understands that Aanzien 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. Hughson seeks to understand when SWDC would facilitate the FUZ to 'live' zoning; and, if there are any triggers preventing 'live' zoning now.

3.10 Hughson 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), Hughson seeks the following relief to enable future development of the Hughson land:

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).

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

FUZ Activities

3.13 Hughson 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]. However, the current ability for "*The storage, treatment, piping and spreading of agricultural effluent including dairy factory*

[3] Ibid., pg25, para 1

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

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, Hughson 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.*"[4]

3.15 Hughson 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[5] 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*".[6]

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.

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.

---

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

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

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

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

Water and Wastewater Servicing Considerations

3.18 PC4 seeks to increase the number of Household Unit Equivalents of demand (HUEs) for each growth cell[7], however no increase has been provided to Growth Cell 4 or FUZ areas. Hughson considers it disingenuous of SWDC to facilitate additional development if the development cannot be supported by additional HUE or appropriate servicing.

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

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.

Hughson 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.

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

4. Relief Sought

In summary, Hughson 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 SUB-R3(6): Change activity status from Discretionary to Controlled.

---

[7] Ibid., pg 28, para 3

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm

10. Proposed Rule SUB-R5(1)(a)(i): Delete proposed rule SUB-R5(1)(a)(i) in its entirety.

5. Closure

Hughson 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 Hughson

Document Set ID: 710742
Version: 1, Version Date: 01/09/2026
Print Date: 19 October 2026, 2:48 pm