From: "Esther Neill" <EstherN@nicholsonsurveying.co.nz>
Sent: Tue, 1 Sep 2026 14:31:56 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Subject: NS3478 - PC4 Submission on behalf of Tomalin Farms
Attachments: NS3478 - PC4 - Tomalin Farms Submission.pdf

Good Afternoon

Please find attached a submission in relation to Plan Change 4 on behalf of Tomalin Farms.

Kind regards
Esther

Esther Neill
Planning Lead
O [redacted]

My normal work days are Mon, Tues, Thurs and Fri.

NICHOLSON SURVEYING LIMITED

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1 September 2026 Our ref: 3478

South Waikato District Council
Private Bag 7, Tokoroa 3444
Via email: submissions@southwaikato.govt.nz

SUBMISSION BY TOMALIN FARMS LIMITED ON PROPOSED PLAN CHANGE 4 TO SOUTH WAIKATO DISTRICT COUNCIL

1.0 SUBMISSION DETAILS

1.1 Tomalin Farms Limited ("the Submitter") makes this submission on Proposed Plan Change 4 - Urban Growth ("PC4") to the South Waikato District Plan ("the District Plan").

1.2 The Submitter does not consider it can gain an advantage in trade competition through this submission.

1.3 The Submitter wishes to be heard in support of its submission.

1.4 If others make a similar submission, the Submitter will consider presenting a joint case with them at a hearing.

2.0 INTRODUCTION AND SUBMITTER'S INTEREST

2.1 The Submitter is the owner of farmland which borders the General Residential Zone of Putāruru, including land that is proposed to be rezoned to Rural Lifestyle Zone and the land which forms the entirety of Putāruru Growth Cell 5.

2.2 The Tomalin family has been farming in the district since 1905 and have strong ties to the district. The Submitter is particularly interested in the rezoning of Lot 6 DP 612161 from

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General Rural Zone to Rural Lifestyle Zone and the rezoning of Putāruru Growth Cell 5. The Submitter has development, farming and community interests in the outcome of PC4.

2.3 This submission relates to the parts of PC4 identified in this document, including any consequential amendments required to give effect to the relief sought.

3.0 EXECUTIVE SUMMARY / OUTCOMES SOUGHT

3.1 The Submitter supports the strategic intent of PC4, including the rezoning of their land to Rural Lifestyle Zone and the proposed rezoning of Putāruru Growth Cell 5. This submission seeks targeted amendments and clarifications to ensure the planning framework is practical, proportionate and capable of supporting coordinated development of these areas.

3.2 In summary, the Submitter supports PC4 and seeks the following outcomes:

- Outcome 1 - retain the identification and proposed rezoning of Lot 6 DP 612161, between Alexander Cres and Walsall Rise, as Rural Lifestyle Zone and extend this area to remove the isolated General Rural Zone remnant between the Rural Lifestyle Zone and Growth Cell 5.

- Outcome 2 - retain the identification and proposed rezoning of Putāruru Growth Cell 5 and extend this area to include the current access section off Arapuni Road.

- Outcome 3 - explicitly exclude Putāruru Growth Cell 5 from the Development Concept Plan (DCP) provisions or amend these provisions so that any DCP is proportionate to the scale and characteristics of this particular growth cell.

- Outcome 4 - amend the DCP provisions relating to the Rural Lifestyle Zone so that a high-level DCP may be provided for the entire site or enable separate DCPs to be submitted for each stage.

- Outcome 5 - make minor amendments to specific policies and rules, as outlined in this submission.

4.0 SUBMISSION POINTS BY TOPIC

4.1 Rezoning of Putāruru Growth Cell 5 and Rural Lifestyle Zone

4.1.1 The Submitter supports the identification and proposed rezoning of Putāruru Growth Cell 5. However, the Submitter seeks that Council amend the planning maps so that the access to Putāruru Growth Cell 5 is also zoned General Residential.

4.1.2 The Submitter supports the identification and proposed rezoning of Lot 6 DP 612161, between Alexander Cres and Walsall Rise, to Rural Lifestyle Zone as part of PC4.

4.1.3 As the current landowner of Lot 6 DP 612161, the Submitter acknowledges that these areas border the existing General Residential Zone and will contribute to identified residential growth needs in Putāruru, forming part of the wider planning response to provide additional residential capacity, housing choice and market competition in the district.

4.1.4 The Submitter seeks that Council review the small area of land (Lot 1 DPS 26076 and Lot 1 DPS 89105) that remains zoned General Rural Zone between the proposed Rural Lifestyle Zone and Putāruru Growth Cell 5. This residual General Rural Zone area appears to create an irregular zoning pattern between two areas identified for future residential and rural lifestyle growth. Retaining a small General Rural Zone pocket in this location may result in inefficient land use, uncertainty for future subdivision and servicing, and an artificial separation between areas that are otherwise logically related to Putāruru's urban area.

4.1.5 The section 32 report identifies Lot 6 DP 612161 (Alexander Cres to Walsall Rise) and Putāruru Growth Cell 5 as comprising land that is not LUC 1, 2 or 3. As long-term custodians of this land, the Submitter supports Council's conclusion that the National Policy Statement for Highly Productive Land does not present a constraint to the proposed residential growth outcome for this land.

4.2 Development Concept Plan

4.2.1 The Submitter seeks that the provisions applying to Lot 6 DP 612161 (Alexander Cres to Walsall Rise) enable efficient and practical rural lifestyle subdivision and development. Any infrastructure, servicing, DCP, reverse sensitivity or natural hazard requirements should be proportionate to the size and characteristics of this block and should not unnecessarily frustrate or delay the delivery of the rural lifestyle capacity anticipated by PC4.

4.2.2 The provisions relating to a DCP for the Rural Lifestyle Zone should also consider the stormwater mitigation work being undertaken by South Waikato District Council which will essentially cut the block in half. This will remove any potential connectivity between the eastern and western sections of Lot 6 DP 612161. The Submitter considers that the DCP provisions should expressly recognise that a high-level DCP may be provided for the entire site or enable separate DCPs to be submitted for each stage.

4.2.3 The Submitter seeks that SUB-INFO-R2 is amended to expressly exclude Putāruru Growth Cell 5. The Submitter acknowledges that the current drafted wording for SUB-INFO-R2 states *"as required"* however this does not provide certainty at the outset that the assessment of the DCP will be proportionate to the scale and complexity of the proposal.

4.2.4 Putāruru Growth Cell 5 is limited to a cap of 10 Household Unit Equivalents (HUE) and constrained due to its size compared to other growth cells. The integrated development outcomes sought by the DCP provisions could be readily achieved via the standard subdivision process. Requiring a separate DCP for this growth cell could add unnecessary cost and complexity to its future development.

4.2.5 Alternatively, if the DCP provisions within SUB-INFO-R2 continue to apply to Putāruru Growth Cell 5, the Submitter seeks that these provisions are amended to clarify they can be applied in a proportionate way, having regard to the scale, nature and stage of subdivision proposed.

4.3 Specific Amendments to Policies and Rules

4.3.1 The Submitter seeks that SUB-P20 is clarified. As drafted, it appears to require a DCP to be approved by Council and approved by way of resource consent, but the rule framework does not appear to establish a separate process for DCP approval. The Submitter seeks clarification that a DCP may be submitted and assessed as part of the relevant subdivision consent application, unless Council intends to introduce a specific standalone DCP approval process with its own activity status, assessment matters and procedural requirements.

4.3.2 The Submitter supports the inclusion of a clear planning framework for Putāruru Growth Cell 5 but seeks amendments to ensure any requirement for a DCP is proportionate to the size of this growth cell and 10 HUE.

4.3.3 The section 32 report provides a general rationale for using HUE caps to manage water and wastewater servicing demand across growth cells; however, it does not appear to provide a specific, site-based justification for why Putāruru Growth Cell 5 is limited to 10 HUE (SUB R5(1)(i)). The Submitter acknowledges that future development of this growth cell is limited due to its size, however more than 10 HUE could be established whilst still meeting the minimum / average lot size requirements. In the absence of a clear servicing assessment or explanation for the 10 HUE figure, the Submitter seeks that Council amend the provisions so the cap can be reviewed through the subdivision / resource consent process where adequate servicing can be demonstrated.

5.0 CONCLUSIONS

5.1 The submission points relate to the following matters:

a. PC4 should retain the proposed rezoning of Lot 6 DP 612161 to Rural Lifestyle Zone and retain the identification and rezoning of Putāruru Growth Cell 5.

b. The planning maps should be amended to remove the isolated General Rural Zone remnant between the proposed Rural Lifestyle Zone and Putāruru Growth Cell 5,

either by rezoning this land to Rural Lifestyle Zone or otherwise integrating it into the appropriate growth framework.

c. The planning maps should be amended so that the access to Putāruru Growth Cell 5 from Arapuni Road is also zoned General Residential Zone, to ensure the growth cell can be practically and efficiently developed.

d. The DCP provisions should be clarified or amended so they apply proportionately to the scale, characteristics and staging of Lot 6 DP 612161 Rural Lifestyle Zone.

e. Putāruru Growth Cell 5 should either be expressly excluded from SUB-INFO-R2 or the information requirements should be amended so that any DCP required for that growth cell is limited to matters that are necessary and proportionate, taking into account the 10 HUE limit of this growth cell.

f. Review or provide further justification for the 10 HUE limit specified under SUB R5(1)(i).

g. Consequential amendments should be made to the planning maps, subdivision provisions, growth-cell rules, assessment criteria, servicing provisions and any related District Plan provisions necessary to give effect to the relief sought in this submission.

6.0 SUMMARY OF RELIEF SOUGHT

6.1 The Submitter seeks that Council make the decisions set out in the table below, together with any consequential or alternative amendments necessary to give effect to the matters raised in this submission.

PC4 provision / map / topic	Position	Reasons	Decision / relief sought
Planning Maps — Lot 6 DP 612161 Rural Lifestyle Zone and Putāruru Growth Cell 5	Support	The Submitter supports the proposed rezoning of Lot 6 DP 612161 to Rural Lifestyle Zone and the identification and rezoning of Putāruru Growth Cell 5 for residential growth.	Retain the proposed Rural Lifestyle Zone and Putāruru Growth Cell 5 rezonings.
Planning Maps — residual General Rural Zone land between the Rural Lifestyle Zone and Growth Cell 5	Amend	The retained General Rural Zone pocket creates an irregular zoning pattern between areas identified for rural lifestyle and residential growth.	Amend the planning maps to rezone the residual General Rural Zone land to Rural Lifestyle Zone or otherwise integrate it into an appropriate growth framework.
Planning Maps — access to Putāruru Growth Cell 5 from Arapuni Road	Amend	The access should be subject to same zoning to enable practical and efficient development of Growth Cell 5.	Amend the planning maps so the access to Putāruru Growth Cell 5 from Arapuni Road is also zoned General Residential Zone.
DCP provisions applying to Lot 6 DP 612161 Rural Lifestyle Zone	Amend / clarify	The DCP requirements should be proportionate to the size, characteristics and staging of the Rural Lifestyle Zone land, including the effect of Council stormwater works on site connectivity.	Amend the provisions to allow a high-level DCP for the whole site or separate DCPs for each stage or discrete area.

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SUB-INFO-R2 and related DCP requirements for Putāruru Growth Cell 5	Amend / clarify	Growth Cell 5 is limited in scale, and any DCP requirement should not impose unnecessary cost, complexity or uncertainty.	Exclude Putāruru Growth Cell 5 from SUB-INFO-R2 or amend SUB-INFO-R2 so any DCP requirement is limited to information that is necessary and proportionate to the nature, scale and effects of the development capacity of this growth cell.
SUB-P20 – Development Concept Plan	Amend / clarify	As drafted, SUB-P20 creates uncertainty as it states that subdivision in a District Growth Cell must not occur unless a DCP has been approved by Council and approved by way of a resource consent. However, there is no corresponding rule framework that provides for this.	Amend SUB-P20 to clarify that a DCP is to be submitted and assessed as part of the relevant subdivision consent application, unless a separate DCP approval process is expressly provided for in the rules.
SUB-R2(6) – Subdivision within District Growth Cells	Amend / clarify	As outlined above, the corresponding policy SUB-P20 appears to anticipate two separate approval concepts, however this rule suggests the DCP and subdivision can be lodged and assessed concurrently.	Amend this rule to confirm that the DCP and subdivision can be assessed concurrently or if Council intends a separate approval mechanism, a specific rule should be inserted providing an activity status, matters of discretion / assessment criteria, and process for the approval of a DCP independent of a subdivision consent application.
SUB R5(1)(i) – Limitations of Putāruru Growth Cell 5	Amend / clarify	Provide further justification for the 10 HUE limit or amend.	Amend this rule to provide a pathway for the 10 HUE limit to be reviewed through the subdivision / resource consent process where adequate servicing can be demonstrated.
Consequential amendments	Amend as required	Consequential amendments may be required to ensure the submission points	Make any consequential amendments to the planning maps, subdivision provisions, growth-cell rules, assessment criteria, servicing

		and relief sought are fully and consistently implemented.	provisions and any other relevant District Plan provisions necessary to give effect to this submission.

Kind regards



Esther Neill

Planning Lead

Nicholson Surveying Ltd

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