From: "Mark Watkins" <MB.Watkins@outlook.com>
Sent: Tue, 1 Sep 2026 22:06:23 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Cc: "Monkey Do Limited" <gwynn.watkins@gmail.com>; "Simon Watkins - South Civil" <simon@southcivil.co.nz>
Subject: Submission on Proposed Plan Change 4 (Urban Growth) — Monkey Do Limited, 20 Frances Street, Tīrau
Attachments: Attachment A - AgFirst NPS-HPL Assessment - 20 Frances Street Tirau.pdf, Attachment B - Property Boundary and Requested Zoning - 20 Frances Street Tirau.pdf, PC4 Submission - Monkey Do Limited - 20 Frances Street Tirau.pdf

Tēnā koutou,

Please find attached a submission by Monkey Do Limited on Proposed Plan Change 4 (Urban Growth) to the South Waikato District Plan, made under clause 6 of Schedule 1 to the Resource Management Act 1991.

Submitter: Monkey Do Limited
- Contact person: Mark Watkins, Director
- Address for service: 20 Frances Street, Tīrau 3410
- Email: mb.watkins@outlook.com
- Phone: [redacted]
- Property concerned: 20 Frances Street, Tīrau — Lot 1 DPS 63682, Lot 8 DPS 13093 and Part Lot 1 DPS 13093, Record of Title SA51C/825, 5.8281 hectares

The submission supports the purpose of Plan Change 4 and does not seek to displace any growth cell. It opposes the plan change in part, on two grounds:

1. Plan Change 4 leaves 20 Frances Street in the General Rural Zone, although the property is an isolated urban-edge remnant enclosed by the Tīrau Golf Club, the General Residential Zone and the General Industrial Zone.
2. Plan Change 4 converts substantially all of Tīrau's Rural Lifestyle Zone to General Residential Zone or General Rural Zone and provides no replacement rural lifestyle capacity anywhere at Tīrau, without that outcome having been evaluated.

The primary relief sought is rezoning of the property to Rural Lifestyle Zone, with Residential Future Urban Zone and General Residential Zone retained as alternatives.

I could not gain an advantage in trade competition through this submission. I wish to be heard in support of the submission, and I will consider presenting a joint case with any other submitter making a similar submission.

Attached:

1. Form 5 submission — Monkey Do Limited, 20 Frances Street, Tīrau (9 pages)

2. Attachment A — AgFirst Waikato (2016) Limited, Assessment Against NPS-HPL: 20 Frances Street, Tīrau, S Alexander, final 26 June 2024
3. Attachment B — property boundary and requested zoning plan

Further material referred to in the submission, including a planning due diligence assessment prepared by The Property Group Limited, is available on request.

Please confirm receipt and registration of this submission.

Ngā mihi,
Mark Watkins
[redacted]

AGFIRST

Independent
Agriculture
& Horticulture
Consultant
Network



Assessment Against NPS - HPL

20 Frances Street, Tirau.

Report prepared for
- **Monkey Do Ltd**

Prepared by Sean Alexander
June 2024

DOCUMENT QUALITY ASSURANCE

Prepared by:	Sean Alexander B.Com(Ag), MNZIPIM Agribusiness Consultant	
Reviewed by:	Jeremy Hunt B.Sc (Env), MNZIPIM Agribusiness Consultant	
Approved for release:	Jeremy Hunt B.Sc (Env), MNZIPIM Director	
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1.0 EXECUTIVE SUMMARY

Monkey Do Ltd are proposing to subdivide the parcel of land at 20 Frances Street Tirau, which is General Rural Zone.

The Subject Site is currently held under one Rural Zoned Title of 5.81 hectares (LOT 1 DPS 63682 LOT 8 DPS 13093 PT LOT 1 DPS 13093). The Subject Site is currently farming beef cattle.

The soils mapped at the property are classified under the NZLRI as LUC 2s1. LUC 2 qualifies as Highly Productive Land (HPL) and is subject to the National Policy Statement for Highly Productive Land (NPS-HPL).

Section 3.10 of the NPS-HPL provides exemptions for HPL to be subdivided, used or developed. A summary of this assessment showed:

- The land is permanently constrained by:
  - Non-reversable land fragmentation of surrounding land, further compounded by the surrounding gully system and modified soils.
  - Small scale operation - of the 5.81 ha property, 4.42 ha is available for land-based primary production, and approximately 2.3 ha is considered HPL.
  - Slope and wetness limitations limiting cropping grounds and stocking rates over winter.
  - Modified soils also constrain crop types and yields and are not considered HPL.
  - Access limitations for heavy machinery
- An indicative budget under pastoral grazing using industry information and AgFirst expertise shows this is not economically viable with a net Earnings before interest, tax, rent and any wages paid to a manager (actual or family) (EBITRm) of - $1,231per ha. There are no surrounding agricultural land that is able to be amalgamated to generate any scale.
- The land has been valued not on the land-based primary production or quality of the soil and land, but the location of the property for speculators and development opportunities, or for lifestyle purposes being at a central location. This block will not be purchased for the sole purpose of land-based primary production.
- Alternative land use options are constrained:
  - Insufficient scale for any alternative higher value primary production, due to development and capital infrastructure requirements.
  - Arable would not be practical as the land suited for arable purposes is only 2.3 ha. The remainder of the Subject Site has soil and slope limitations, which will constrain crop types and yields. Lack of scale, poor yields and high cost of contractor/freight would not make this economically viable or a sought-after property for a contractor to lease.
- Under land-based primary production the optimal land use is pastoral grazing. This is not economically viable due to land fragmentation, the high value of the land and the small scale of effective pastural areas. These factors cannot be addressed through reasonably practical options. Therefore, the proposal meets the exemption under 3.10 of the NPS-HPL to enable the proposed rezoning.

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2.0 BACKGROUND AND PROPERTY DESCRIPTION

Monkey Do Ltd are proposing to subdivide a property at 20 Frances Street, Tirau (**Subject Site**) that is located within the General Rural Zone (**GRUZ**). The Site's location and boundary are presented in Figure 1.

The Subject Site is currently held under one Rural Zoned Title of 5.81 hectares (**ha**) (LOT 1 DPS 63682 LOT 8 DPS 13093 PT LOT 1 DPS 13093). The Subject Site is currently farming beef cattle.

AgFirst Waikato (2016) Ltd (**AgFirst**) has been engaged by Monkey Do Ltd to provide an assessment of the proposed land use change against the National Policy Statement - Highly Productive Land (**NPS-HPL**). This relates to an assessment on whether it is considered the land use change meets the exemptions set out in Section 3.10 of the NPS-HPL.

AgFirst is a suitably qualified agribusiness consultancy that has a wealth of experience in assessments relating to productive capacity, primary production, economic analysis, soil versatility and assessments against the NPS-HPL.

AgFirst visited the property on the 27th of May 2024 to undertake this assessment.

2.1 Site description

The Subject Site has been isolated from large landholdings since the golf course was initially established between 1971-1976. Current land use includes approximately 4.42 ha of pasture that is currently farming ten rising two-year-old (**R2**) beef cattle and four spring born rising one-year-old (**R1**) beef cattle. To the south and east of the property, there is a settlement of dwellings in a Residential Zone (**GRZ**) and Industrial Zone (**GIZ**). This extends across State Highway 27 (SH27) which is the settlement of Tirau. The property has the Tirau golf course on the Northern and Western boundary. This makes the property entirely land locked, with non-reversable land fragmentation. The Site has 1.39 ha of non-effective gully on the southern and eastern boundary that is stock excluded, this is considered non effective due to the contour and wetness limitations preventing productive use of the land. The Subject Site is presented in Figure 1. The zoning map from the South Waikato District Plan is presented in Figure 2.

2.2 Land Titles and District Plan Zoning

The Subject Site currently sits under a single Title as outlined in Table 1 and Figure 1.

The current zoning of the site is GRUZ. The golf course to the north and west is also GRUZ. The sections to the south and east are zoned as a GRZ and GIZ. These are shown on Figure 2.

Table 1: Property details

	Parcel / Lot	Area (ha)
Existing	LOT 1 DPS 63682 LOT 8 DPS 13093 PT LOT 1 DPS 13093	5.81 ha
	Total	**5.81 ha**

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Figure 1: Site and Non-Effective Areas

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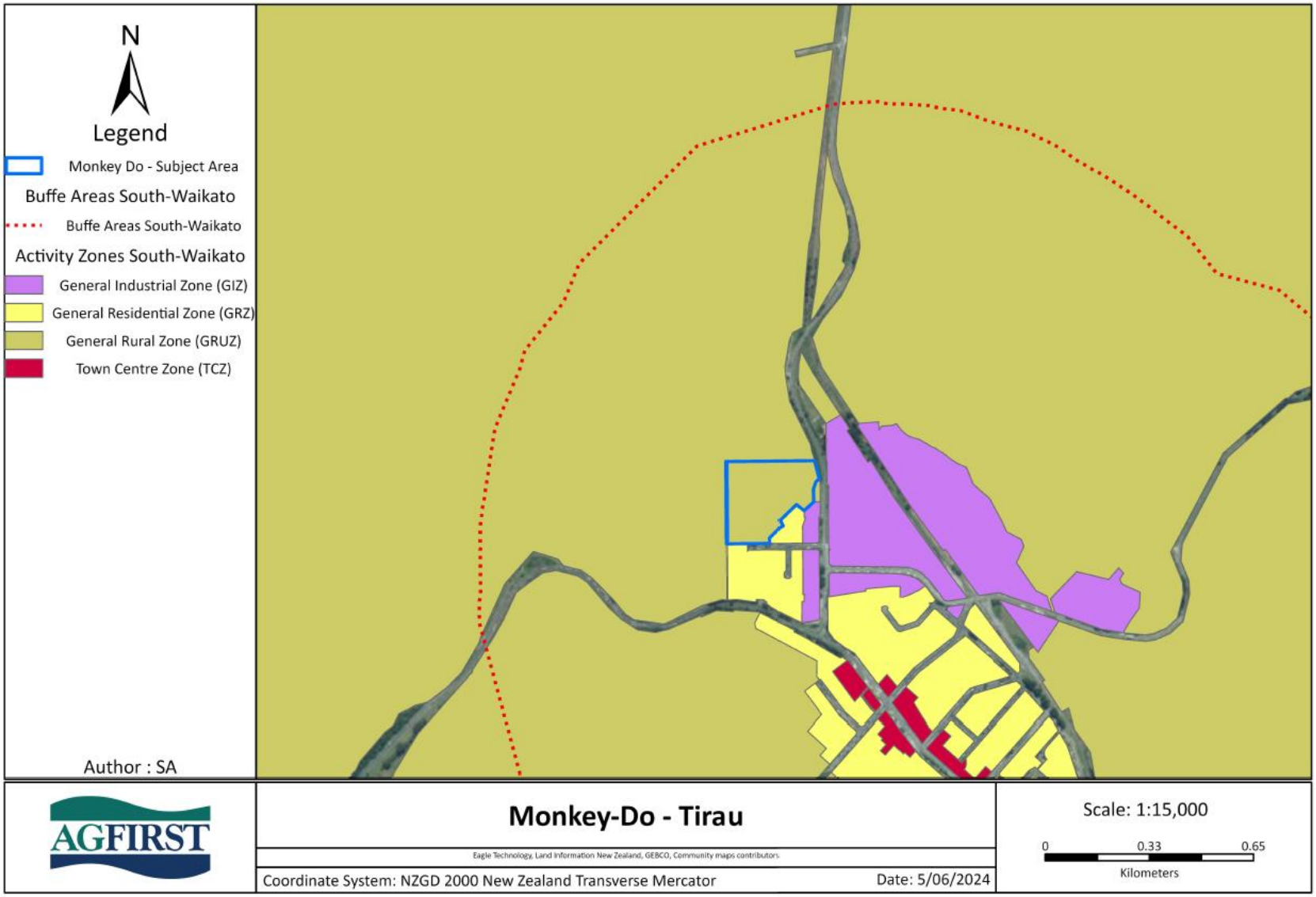


Figure 2: Subject Site Zoning Map

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2.3 Current land use

The property contains approximately 4.42 ha of effective productive area available for land-based primary production. This consists of a mix of flat area (approximately 2.3 ha), modified soils from cut and fill (approximately 1.05 ha) and grazed areas of the gully and sidling (approximately 1.07 ha).

The productive area is grazing ten R2 cattle and four R2 beef cattle, with a revised stock unit (RSU) of 16 RSU/ha. This is likely too many livestock for this block given the mix of contour and wetness limitations, as mentioned by the manager of the stock and indicated by the low pasture covers during the site visit. There is no infrastructure or machinery on the property for feeding purchased supplementary feed in the instance of a feed pinch. In the indicative budget AgFirst has moderated the stocking rate to seven R2 and seven R1 beef cattle, which is a more sustainable rate of 13 RSU/ha, given the limitations. The pasture species on the elevated flat terraces is dominated with ryegrass and clover, while the western hill behind the house and the grazed areas of the gully and sideling has had poor quality species and open weedy pastures.

There is a non-productive and stock excluded area of 1.39 ha on the southern and eastern boundary, this area is a gully with a steep hill and is very wet due to the proximity to the small creek. This area can be identified in Figure 1 and is shown in images of Figure 3.

AgFirst has prepared an indicative budget using actual and industry values when necessary (Table 2). The full detail is provided in Appendix A. The Earnings Before Interest, tax, rent, and management wage (actual or family) (EBITRm) has been calculated, with the EBITRm being -$1,231 per ha and a total operational loss of -$5,443 over the Subject Site. Note that management wage is separate from labour or operational wages, and the EBITRm includes council rates.

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Table 2: Indicative financial budget of the Subject Site

Area (ha)	4.42	$ Total
Revenue	Beef Sales	11,368
	Beef Purchases	3,850
	Total	7,518
Total Revenue		7,518
Operating Expenses	Wages	3,120
	Animal Health	355
	Fertiliser	1,243
	Vehicle Expenses	0
	Repairs & Maintenance	669
	Electricity	63
Total Operating Expenses		5,451
Fixed Expenses	Administration Expenses	1,500
	Insurance	0
	Rates	5,760
Total Fixed Expenses		7,260
Depreciation		250
Total Expenses		12,961
Total EBITRm		-$ 5,443
EBITRm/ha (4.42 ha)		-$ 1,231



The non-productive gully, showing severe wetness and slope limitations (image facing north)

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The non-productive gully, showing severe wetness and slope limitations (image facing south)



The non-productive gully, showing contour and proximity to stream (image facing south-east)

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Image of stock excluded stream on southern boundary of property (image facing East)



Image showing the contour of the gully, erosion risk as well as shed infrastructure on site.

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Image showing R2's grazing pasture, indicating the intensity of grazing



Image showing calves on the northern boundary of Site adjacent to the golf course.

Figure 3: Images of the subject property.

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2.4 Proposed Rezoning

The proposal is to subdivide approximately the entire 5.81 ha of the property into smaller lots (See Figure 4) . This area is marginal land when considering land-based primary production, due to the constraints and physical limitations that exist.

The productive areas and the proposed changes based on the proposal are shown in Table 3 below. The proposed plan is illustrated in Figure 4 below.

Table 3: Current vs Proposed block areas

Block name	Current size (ha)	Proposed size (ha)
Pastoral area	4.42	0.0
Non pastoral area	1.39	5.81
Total area	**5.81**	**5.81**

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Figure 4: Proposed site schematic (supplied by Monkey Do Ltd)

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2.5 Surrounding land use

To the south and east of the property, there is a large settlement of dwellings in a GRZ and GIZ, which extends into the township of Tirau. The property has the Tirau golf course on the northern and western boundary which is also GRUZ. This makes the property entirely land locked from any other pastoral areas. Beyond the golf course are dairy farms.



The effective areas of the Subject Site on the elevated areas and neighbouring golf course.



Site facing southeast, Tirau in the background.

Figure 5: Images of surrounding land use.

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2.6 Potential for land based primary production.

The property is currently grazing ten R2 and four R1 beef cattle. Which is hobby or lifestyle block rather than an economic grazing block. The land has been in small scale pastoral land use since its physical isolation from any other farmland in the early 1970's. The site does not have sufficient size to be an economically viable and productive unit. A combination of non-reversable land fragmentation and very small scale, means there is no ability for economic viability in its current form or any reasonably practicable alternative land based primary production.

While all the 4.42 ha of pastoral land would be available for land-based primary production, the southern and eastern gully, house and curtilage (1.39 ha), is unproductive due to contour, wetness, and vegetation, therefore, deemed non-effective.

Within the productive areas there is a limited opportunity for land-based primary production. Although the online soil database identifies the majority of the soils as well drained (see Section 3.3), site specific soil augers and pits undertaken during the site visit indicate that there is a higher proportion of poorly drained and modified soils than indicated through S-Maps.

Aerial imagery from 1971 (Figure 6) shows the large extent of ineffective and non-productive areas across the southern and eastern gully, paired with the Gley soils and heavy mottling found in soils indicates there is likely to be a higher proportion of poorly drained soils than indicated by S-Maps data. The imagery also shows a significant area of soil and land modification since 1971.

Some areas of the Subject Site may be suitable for more productive uses such as arable. However, due to the permanent and long-term constraints present, such as non-reversable land fragmentation, small scale, physical isolation and limited access for large machinery, this would be an unrealistic production type. Therefore, the highest and best land based primary production for the Subject Site is restricted to pastural grazing. However, due to the significant constraints this block faces, it is not economically viable.

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Figure 6: Aerial Imagery, 1971, with General indication of Site Boundary. Yellow area identifies approximate areas of modified soils and landscape

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Evidence of wetness limitations



Evidence of wetness limitations

Figure 7: Images of Wetness limitations throughout Site.

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3.0 ASSESSMENT OF LAND USE CAPABILITY CLASSES

3.1 Regulatory framework for highly productive land

The property falls under the jurisdiction of the South Waikato District Council, and the Waikato Regional Council. Relevant policy is included in Appendix B. In summary, the intent is to protect high class soils for land-based production.

The NPS-HPL came into effect on the 17th of October 2022. The statement sets out a prescriptive approach for councils to identify and protect highly productive land. Until councils have given effect to the NPS-HPL, the interim is provided:

3.5 (7) Until a regional policy statement containing maps of highly productive land in the region is operative, each relevant territorial authority and consent authority must apply this National Policy Statement as if references to highly productive land were references to land that, at the commencement date:

(a) is (i) zoned general rural or rural production; and
(ii) LUC 1, 2, or 3 land;

LUC 1, 2, or 3 land is defined as: land identified as Land Use Capability Class 1, 2, or 3, as mapped by the New Zealand Land Resource Inventory (NZLRI) or by any more detailed mapping that uses the Land Use Capability classification.

3.2 NZLRI LUC representation

The LUC Classification system is used in New Zealand to help achieve sustainable land development and management on farms. The LUC classification categorises land areas or polygons into classes, subclasses, and units according to the land's capability to sustain productive use. This is summarised in Figure 8 below.

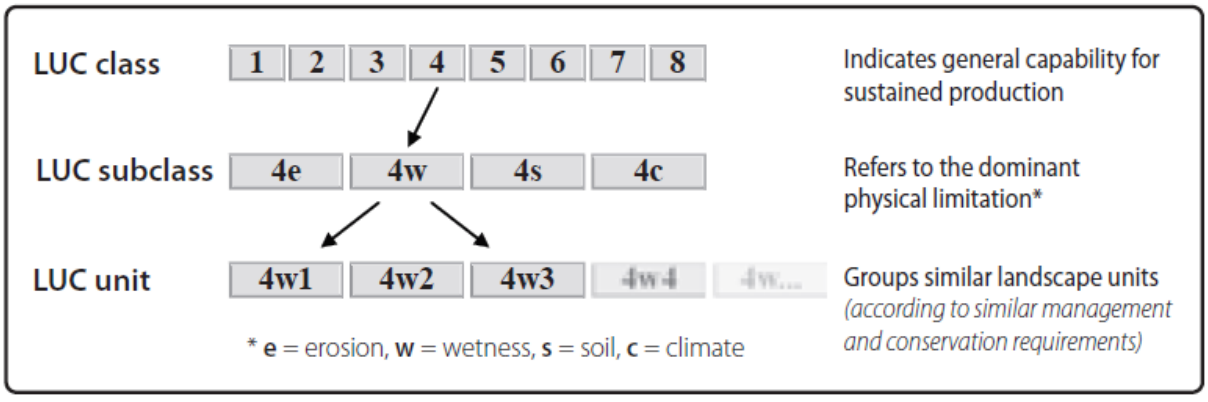


Figure 8: Components of the land use capability classification.

The soils mapped at the property are classified under the NZLRI as LUC 2s 1. The LUC 2 area qualifies as HPL and is subject to the NPS-HPL. The location of the proposed land use change in relation to the LUC soil classifications is presented in Figure 9. The scale of this mapping is not intended for farm scale interpretation. The gully and sloping areas on the site are not LUC 2, this is due to the contour, wetness, and vegetation of the hill. This inaccuracy is due to the scale of the mapping, which is 1:63,000.

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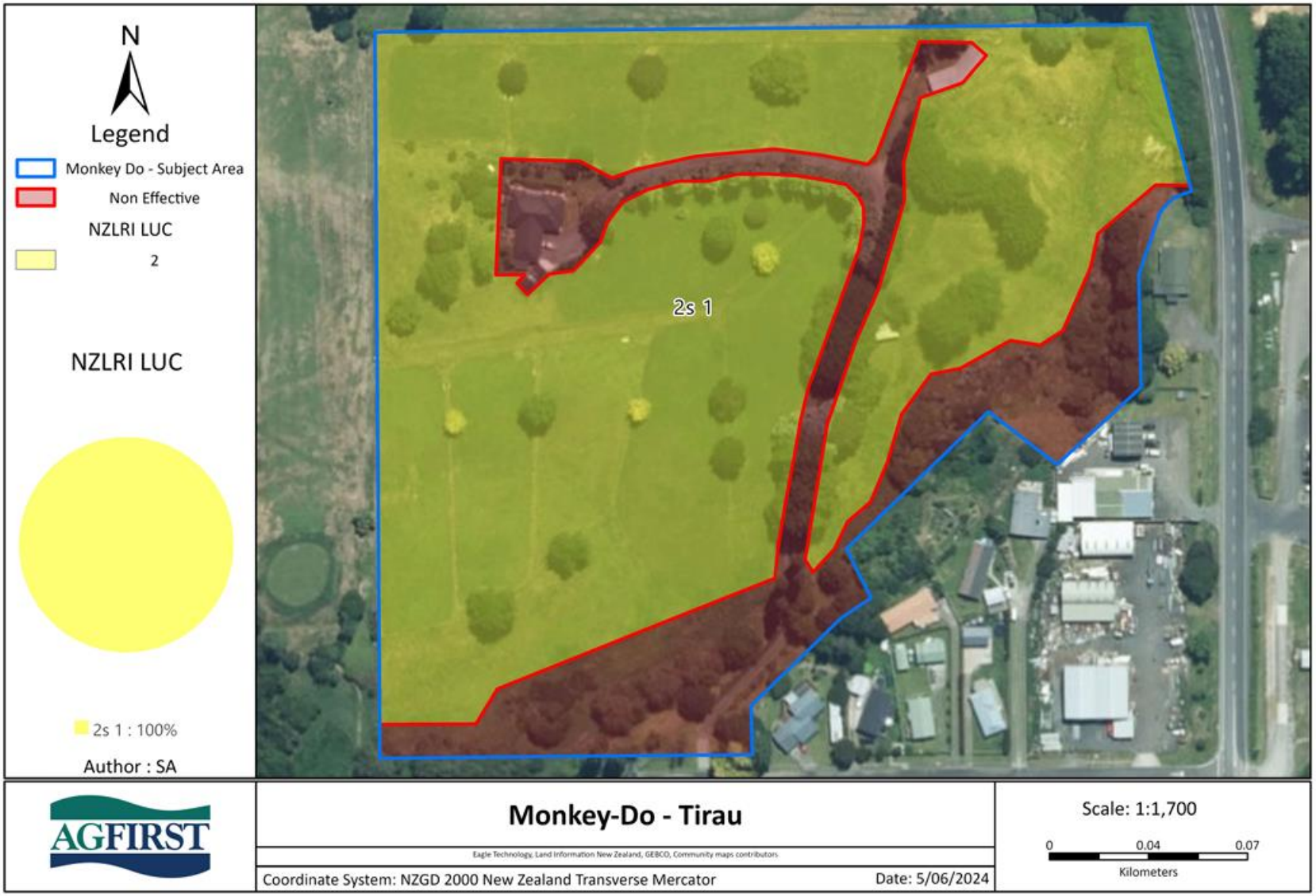


Figure 9: NZLRI Land use classification for Site.

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3.3 Soil Classification

Landcare Research Manaaki Whenua (S-Map)[1] is a digital soil map of New Zealand, it provides a range of soil information to support sustainable management of the soil resource. The maps are designed for use at a 1:50,000, so should be treated as an indicator for soil properties at the site.

Figure 10 and Figure 11 shows the Subject Site as mapped by S-Map is mainly well drained Typic Orthic Allophanic soils, with some poorly drained Typic Orthic Gley soils to the south.

The elevated terraces contained mostly well drained soils, as per the S-Map database. This was confirmed through soil auger samples completed during the site visit, with around 300 mm of topsoil found in the observations. Presented in Table 4 are the characteristics of the soils identified across the majority of the block.

Within the gully system to the south and east of the Subject Site, there was heavy mottling and gleying identified in the soil profiles. This suggests water logging or an elevated water table at times, and likely poorly drained soils. This indicates that the distribution of poorly drained soils is higher than that mapped by S-Maps. These soils will lead to excessive wetness and will limit cultivation and cropping yields. Figure 12 shows this at the top of a sidling. (as seen in Figure 12).

[1] https://smap.landcareresearch.co.nz/

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Figure 10: S-Map soil drainage class.

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FIGURE 11: S-MAPS SOIL CLASSIFICATION OF SITE

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Table 4: Soil characteristics



Soil Name: Otorohanga **Soil Classification:** Typic Orthic Allophanic Soils (LOT) **Overall drainage:** Well drained (WD)	**Features:** Allophanic Soils are dominated by allophane (and also imogolite or ferrihydrite) minerals. These stiff, jelly-like minerals coat the sand and silt grains and maintain a porous, low-density structure with weak strength. The soils are identified by a distinctly greasy feel when moistened and rubbed firmly between the fingers. The soil is easy to dig and samples crumble easily when crushed in the hand. It is formed in fragmental material erupted from a volcano, from rhyolite parent material.	**Soil description:** 18-24 cm: Loamy Weak, Acidic Tephric 25-40 cm: Loamy Weak, Acidic Tephric 40-55 cm: Loamy Fine Slightly Firm, Acidic Tephric
Area: 4.27 of Effective ha (S-maps)	**Slope:** A	**LUC Unit and Soil Classification**: LUC 2s - Highly productive land



Soil Name: Temuka **Soil Classification:** Typic Orthic Gley Soils (GOT) **Overall drainage:** Poorly drained (PD)	**Features:** This soil belongs to the Gley soil order of the New Zealand soil classification. Gley soils are strongly affected by waterlogging, have been chemically reduced, have light grey subsoils, and usually have reddish brown or brown mottles. Waterlogging occurs in winter and spring, and some soils remain wet all year. It is formed in alluvial sand silt or gravel deposited by running water, from andesite parent material.	**Soil description:** 15 - 20 cm: Loamy fine slightly firm. 40 - 65 cm: Clayey Fine Sl Firm. 25 - 35 cm: Clayey Coarse. A pan was present at an approximate depth between 200-300 mm.
Area: 0.15 of Effective ha (S-maps)	**Slope:** A	**LUC Unit and Soil Classification**: LUC 2s - Highly productive land

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Location of poorly drained Temuka soil identified throughout the gully system



Poorly drained Temuka soil identified at higher elevations



Location of poorly drained Temuka soil at higher elevations

Figure 12: Images of soil characteristics

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Modified Soils

Modified soils were identified at several locations throughout the property. These were identified by a buried A-horizon in the soil and can be seen in Figure 13 with the historical imagery (Figure 6) providing further evidence. The area to the west of the dwelling is likely a result of deposits of overburden from the house site. There is also evidence of a significant re-contouring and filling area along the southern extents of the Subject Site. The historical imagery shows a much larger gully area with a finger extending to the north. This has now been shaped and filled to expand the productive area. These areas were likely overburden and fill receiving site from the golf course development. These areas are modified to a degree that means they cannot be returned to the original soil. Other examples modified or non-productive areas identified within the Subject Site include permanent races and tracks, buildings and disturbed surrounds, excavated drains and deposited spoil, areas of mature native trees, wetlands, gully's and riparian areas. Modified soils are no longer considered HPL.



Buried A Horizon located to the west of the dwelling (modified soil)

Figure 13: Image showing soil modification

Updated LUC Areas

Using information available and confirmation from the site visit, AgFirst are able to ascertain likely extent of HPL within the Subject Site. Once the modified soils and land and gully are removed, as these are not LUC 1-3, the estimated area of HPL is 2.30 ha. This is summarised in Table 5 and presented in Figure 14. Figure 15 shows a simplified map of HPL and non-HPL areas.

Table 5: Breakdown of land use

Land use	HPL classification	Area (ha)
Effective pastural grazing - elevated terrace	HPL	2.30
Effective pastural grazing – soil modifications	Non HPL	1.05
Effective pastural grazing – slope and wetness limitation	Non-HPL	1.07
Non-productive – house, curtilage and gully	Non HPL	1.39
Total		**5.81**

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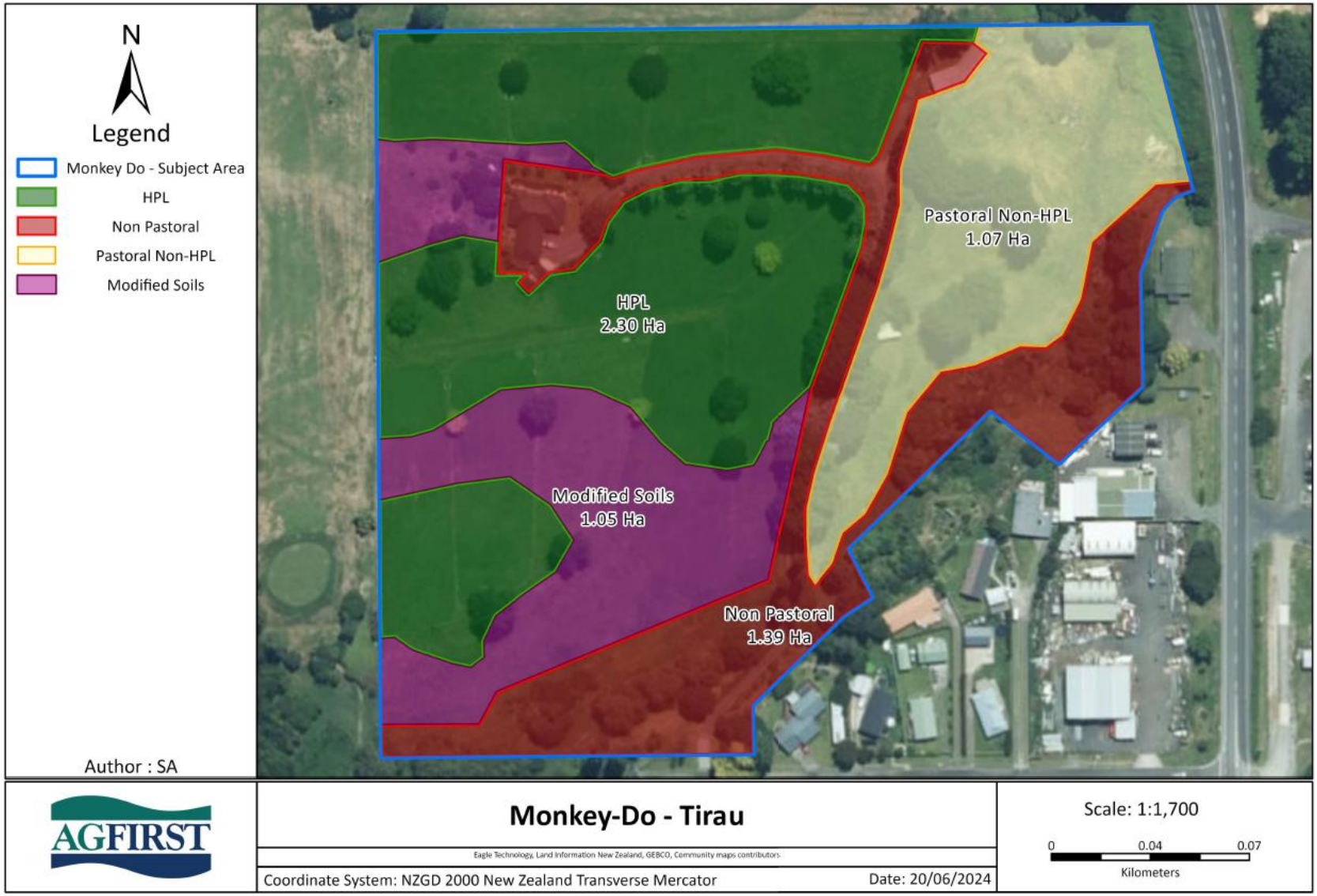


Figure 14: Map of Subject Site showing the various land uses

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Figure 15: Updated map of the Subject Site showing HPL areas

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4.0 PROTECTION OF HIGHLY PRODUCTIVE LAND

The objective of the NPS-HPL is "*Highly productive land is protected for use in land-based primary production, both now and for future generations*", The NPS however does recognise that there are certain situations where the subdivision and changes of land use within HPL is appropriate. Section 3.10 of the NPS-HPL allows for the subdivision of HPL if certain criteria are met, this section provides an assessment against clause 3.10. This assessment discusses how the 4.42 ha of HPL proposed for rezoning meets these exemptions.

4.1 Clause 3.10(1)(a) Constraints and economic viability

3.10 (1) Territorial authorities may only allow highly productive land to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, or 3.9 if satisfied that:

(a) There are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years.

Table 6: Assessment against NPS-HPL Clause 3.10(1)(a) constraints and economic viability

PERMANENT OR LONG-TERM CONSTRAINTS	
Non-reversable land fragmentation	The HPL area within the site (2.30 ha) is small and fragmented and of an unproductive size. To the south and east of the property, there is a settlement of dwellings in a GRZ and GIZ, this extends into the settlement of Tirau. The property has the Tirau golf course on the northern and western boundary which is also GRUZ. This makes the property entirely land locked from any other pastoral areas and subject to non-reversable land fragmentation constraints. Amalgamation/leasing of additional land to establish a productive and economic unit is not possible. There are no reasonably practicable options to overcome this permanent fragmentation constraint. The current access to the productive area for the Subject Site is by crossing over the stream with a small bridge from the southern boundary. This is not possible for large or heavy machinery.
Wetness and Slope limitations	Wetness and slope limitations within the gully system constrains pasture yields, as well as carrying capacity of pastural land during wet periods. Evidence of mottling was present in all samples within the gully, suggesting water logging and poor drainage This poses challenges during wet periods of where to stock the cattle to avoid pugging and soil structure damage. Consequently (and along with other issues), the farm is very lowly stocked, which exacerbates the economic viability. These areas would not classify as HPL under the classification definition, as they are steeper than 15 degrees, and the flat areas at the bottom are inundated with water for more than once per year for longer than 2 days.

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Small scale of operation	The Subject Site is 5.81 ha, of which 4.42 ha is estimated as potential primary production area. This is only considered a hobby farm or lifestyle block, with a negative economic return. The better draining soils on the flat areas of the property, which are the only HPL areas on the site, are the most productive areas. But there is only 2.30 ha available, therefore too small to quantify any higher value land use. There is no opportunity to amalgamate properties due to the site being land locked form other pastoral areas. The golf course will likely contain modification of soils meaning it is also no longer HPL.

IMPACT ON ECONOMIC VIABILITY	
Indicative budget shows a net loss	Under the highest productive and sustainable land use as a livestock grazing operation, an indicative budget is provided for a total effective production area of 4.42 ha, see Appendix A for further details: » Information specific to the Subject Site, along with the Class 5 North Island Finishing Operation from B+LNZ data and industry knowledge has been used for the profit and loss margin for this small-scale livestock operation. » Total EBITRm/ha is estimated at -$1231/ha, with a total loss of $5,443 per year for the entire property and operation. » A long-term (30 year) average interest rate and debt servicing/return on capital puts this further in the negatives. Presenting a negative EBITRm means there are no funds available for debt servicing, living costs, capex or return on capital. The block is therefore not economically viable. » After debt servicing the net loss is -$4,652/ha and -$20,563 for the full 4.42 ha of effective land. This further illustrates how the block is not economically viable as a real-world business model needs to apply, as per the Cambridge Dictionary definition of commercial viability "*the ability of a business, product, or service to* ***compete effectively and to make a profit***". The interest liabilities for the land includes a nominal debt loading of 30% and an interest only repayment rate of 7%. Note the land only value from the CV has been used rather than the capital and improvement value. Changing the type of livestock run or management thereof will not sufficiently lift profitability, the property is not an economic size for pastoral grazing. The value of the land is not based on the productive potential or quality of the soil and block, but the location of the property for speculators, development opportunities or lifestyle purposes. This means that the liabilities, rates and debt servicing tied to the land are significantly higher than for a typical farming operation of this type. This is exacerbated by the small scale of the property. This property would not be sought after by a farmer for the purpose of land-based primary production.
No scope to sufficiently increase scale	B+LNZ data shows that for Northern North Island Finishing class land the average farm size is 251 ha (average for last 5 years), at 4.42 ha of grazeable land this is far too small to be a considered an economic unit. The fragmentation of surrounding land is irreversible, and as the property is bounded to the south and east by a settlement of dwellings in a GRZ and GIZ,

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	which extends into the Tirau township. The property has the Tirau golf course on the Northern and Western boundary which is GRUZ. This makes the property entirely land locked from any other pastoral or land-based primary production areas.

4.2 Clause 3.10(1)(b) Avoidance of significant loss, fragmentation, reverse sensitivity

3.10 (1) Territorial authorities may only allow highly productive land to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, or 3.9 if satisfied that:

(b) the subdivision, use, or development:

(i) Avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and

(ii) Avoids the fragmentation of large and geographically cohesive areas of highly productive land; and

(iii) Avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development.

Table 7: Assessment against NPS-HPL Clause 3.10(1)(b) significant loss, fragmentation and reverse sensitivity

HPL LOST FROM PROPOSED DEVELOPMENT
4.42 ha The proposal is to subdivide the property. The area effected will total at maximum 5.81 ha, while only 2.3 ha would be defined as HPL and be lost to primary production through the subdivision of the land. This land is not economically viable due to the scale and the constraints identified.
WILL SIGNIFICANT LOSS OF PRODUCTIVE CAPACITY OCCUR?
No. Currently there is approximately 4.42 ha of effective area available for land-based primary production and approximately only 2.30 ha that would be defined as HPL. None of this area will be productive once the land is subdivided. The current productive use of this area is pastoral grazing, which is not economically viable due to non-reversable land fragmentation, small scale, physical isolation, slope and drainage characteristics limiting production and versatility. Considering the highest land use identified is pastural grazing of stock, this is not a production type that is dependent on HPL, therefore as is typical much better suited to hill country and larger scale farms.
WILL FRAGMENTATION OF LARGE AND GEOGRAPHICALLY COHESIVE AREAS OF HPL OCCUR?
No. This is not a large or geographically cohesive area of HPL. Fragmentation already exists with the town to the south and east, and the golf course to the west and north. The removal of the 2.30 ha of HPL will have no impact on any surrounding productivity, as the property is completely isolated from any other agricultural properties.

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WILL THE DEVELOPMENT RESULT IN ANY REVERSE SENSITIVITY EFFECTS?
No. No sensitive activities are proposed as part of the rezoning which might give rise to effects on relevant and existing “effect generating activities”.

4.3 Clause 3.10(1)(c) Environmental, social, cultural, and economic costs/benefits

3.10(1) Territorial authorities may only allow highly productive land to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, or 3.9 if satisfied that:

(c) The environmental, social, cultural and economic benefits of the subdivision, use or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of the highly productive land for land-based primary production, taking into account both tangible and intangible values

Table 8: Assessment against NPS-HPL Clause E.10(1)(c) Environmental, social, cultural, and economic costs/benefits

ENVIRONMENTAL
Improved/No change. The removal of 2.30 ha of HPL will have negligible material change to the environmental impact. There is already low/negligible impact to grazing this area, therefore by removing this area and the cattle which it sustains means there will be no increase in environmental impact on the remaining productive area. Therefore, the overall environmental impact is improved/negligible change as a result of removing the cattle from the property.
SOCIAL
Improved. The proposed rezoning will enable more consumers to access the small businesses in the community, allowing them to grow. This will have a positive social contribution to the local community. The current operation currently has no employment opportunities with less than 1 hour of a full time equivalent required to operate the block.

CULTURAL
No change. There are no known sites of cultural significance within the subject property.

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ECONOMIC
Improved. Under the highest and best land use, land based primary production is limited to a lowly stocked pastural grazing system. With no viable or reasonably practicable land-based primary production options being profitable, the rezoning will significantly increase the economic return from the property. The economic return for the community and local businesses is likely to improve as more people from outside the community are moving into the town and spending money in the locality.

4.4 Clause 3.10(2) Alternatives to retain productive capacity

3.10(2) In order to satisfy a territorial authority as required by subclause (1)(a), an applicant must demonstrate that the permanent or long-term constraints on economic viability cannot be addressed through any reasonably practicable options that would retain the productive capacity of the highly productive land, by evaluating options such as (without limitation):

(a) Alternate forms of land-based primary production
(b) Improved land-management strategies
(c) Alternative production strategies
(d) Water efficiency or storage methods
(e) Reallocation or transfer of water and nutrient allocations
(f) Boundary adjustments (including amalgamations)
(g) Lease arrangements

Table 9: Assessment against NPS-HPL Clause 3.10(2) Alternatives to retain productive capacity

ALTERNATIVE FORMS OF LAND BASED PRIMARY PRODUCTION	
Dairy Farm or Dairy Support Farm	Not a reasonably practicable option. » The property is completely isolated from any of the dairy farms and would not support enough cattle or replacements to justify a land use into dairy or dairy support. » At 4.42 ha this is of insufficient scale to create an economic dairy or dairy support farm.
Arable or cropping	Not a reasonably practicable option. » At 2.3 ha this is of insufficient scale to create an economic arable or cropping operation. » There is only approximately 2.3 ha of soils that would be suitable for long-term arable cropping, which would be too small to operate in isolation. » There is no suitable access for heavy machinery. Investment into access would not be justified and not considered reasonably practicable. » Soil modifications, slopes, and wetness limitation restricts suitable growing areas. » The physical isolation also restricts amalgamation and expansion opportunities

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Horticulture	Not a reasonably practicable option. » At 2.3 ha this is of insufficient scale to create an economic horticultural operation. » There is only approximately 2.3 ha of soils that would be suitable for horticulture, which would be too small to operate in isolation considering the investment requirements for horticulture. » The development costs involved for establishing a horticulture operation is estimated as $150,000 - $250,0000 per ha (including irrigation, plants, frost protection, trellis infrastructure and shelter) in addition to license fees. » There is no suitable access for heavy machinery and investment into access would not be justified and not considered reasonably practicable. » Soil modifications, slopes, and wetness limitation restricts suitable growing areas. » The physical isolation also restricts amalgamation and expansion opportunities

IMPROVED LAND-MANAGEMENT STRATEGIES
The constraints of irreversible land fragmentation and small scale cannot be overcome by land management strategies.
ALTERNATIVE PRODUCTION STRATEGIES
The size does not allow for alternative land based primary production or diversification. The indicative budget provided shows a typical small scale beef production operation, while small improvements are feasible these would not be significant enough to lift profitability to an economic level. Additionally, due to the risk of feed shortages, the blocks are operated at low stocking rates.
WATER EFFICIENCY OR STORAGE METHODS
Water will be required for stock drinking, this is already assumed to be available under the indicative operation. There is no other requirement for water use. The scale is not suitable for horticultural production, which would benefit from irrigation.
REALLOCATION OR TRANSFER OF WATER AND NUTRIENT ALLOCATIONS
This is not applicable as the land is not currently subject to nutrient allocations or caps. As noted above, water is not a limiting factor.
BOUNDARY ADJUSTMENTS (INCLUDING AMALGAMATIONS)
The block is isolated, the property is bounded to the south and east of the property by a settlement of dwellings in a GRZ and GIZ, this extends into the township of Tirau. The property has the Tirau golf course on the northern and western boundary which is GRUZ. This makes the property entirely land locked from any other land-based primary production areas.
LEASE ARRANGEMENTS
As above, surrounding land is not practical to lease due to small non-contiguous nature. The Subject Site is of a scale that is unviable and will not add any benefit to an existing operation.. The lease rate would have to be adjusted based on production, and with a low productivity this would not cover the fixed costs for the landowner.

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4.5 Clause 3.10(3) Evaluation of reasonably practical options

3.10 (3) Any evaluation under subclause (2) of reasonably practicable options:

(a) Must not take into account the potential economic benefit of using the highly productive land for purposes of other than land-based primary production; and
(b) Must consider the impact that the loss of the highly productive land would have on the landholding in which the highly productive land occurs; and
(c) Must consider the future productive potential of land-based primary production on the highly productive land, not limited by its past or present uses.

Table 10: Assessment against NPS-HPL Clause 3.10(3) Evaluation of reasonably practical options

NO ACCOUNT FOR ECONOMIC BENEFITS OTHER THAN LAND BASED PRIMARY PRODUCTION
Assessments undertaken in Table 6 including alternative forms of land based primary production, improved land management strategies, alternative production strategies, water efficiency or storage methods, reallocation or transfer of water and nutrient allocations, boundary adjustments including amalgamations and lease arrangements are independent of any potential economic benefit of using the HPL for purposes other than land-based primary production. AgFirst has used actual and industry specific data to determine the budgets.
IMPACT OF LOSS OF HPL ON LANDHOLDING
The major constraint for the subject property is fragmentation and the very small HPL area. There entire Subject Site is proposed for rezoning, therefore there will be no remaining HPL for land-based primary production. The impact on the remaining HPL is negligible, it is already at a small and insufficient scale to be economic, as indicated by the economic analysis.
FUTURE PRODUCTIVE POTENTIAL
The highest and best land-based primary production for both now and the future is continuing with the existing pastoral grazing. This is based on the limitations and long-term constraints set out in Table 6, being non-reversable land fragmentation and small scale of operation. There are no additional reasonable and practicable land management strategies or high productive potential for improving the productive capacity of the block.

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APPENDIX A: INDICATIVE BUDGET – 20 FRANCES STREET, TIRAU

Property		20 Frances St, Tirau
Legal description		13093 PT LOT 1 DPS 13093
Capital value		$ 1,275,000
Land value		$ 720,000
Land Value/ha		$ 123,924
Area (ha)		$ 5.81
Effective area (ha)		$ 4.42
Debt Servicing	Total $	$ 15,120
Debt Servicing / effective ha	$/ha	$ 3,421
Most Productive Land use		Beef finishing
EBITRm	$/ effective ha	-$ 1,231
	$Total	-$ 5,443
Net Profit	$/effective ha	-$ 4,652
	$Total	-$ 20,563
SWDC		$ 5,095.44
WRC Rates		$ 664.27
Total Rates		**$ 5,759.71**

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Area (ha)	4.42	$ Total	Source and Justification
Revenue	Beef Sales	11,368	7 prime beast sold at an assumed weight of 280kg carcass weight, at $5.80/kg
	Beef Purchases	3,850	7 calves purchased at $550/hd
	Total	7,518	
Total Revenue		7,518	
Operating Expenses	Wages	3,120	assume 1 hrs per week valued at $50/hr
	Animal Health	355	Based on B+LNZ Economic Survey, NNI Class 5 finishing land 22/23 provisional of $80.41/ha
	Fertiliser	1,243	Based on B+LNZ Economic Survey, NNI Class 5 finishing land 22/23 provisional of $281.27/ha
	Vehicle Expenses	0	Assume no vehicles are required for a block of this size and there are no activites such as feeding supplements that require vehicles
	Repairs & Maintenance	669	Based on B+LNZ Economic Survey, NNI Class 5 finishing land 22/23 provisional of $151.39/ha
	Electricity	63	Based on B+LNZ Economic Survey, NNI Class 5 finishing land 22/23 provisional of $14.34/ha
Total Operating Expenses		5,451	
Fixed Expenses	Administration Expenses	1,500	Accountancy fees for a small block with minimal transactions $1,500
	Insurance	0	Assuming there are no vehicles and no building used for primary production
	Rates	5,760	Rates considered based on actuals
Total Fixed Expenses		7,260	
Depreciation		250	Assumed depreciation on tools and equipment
Total Expenses		12,961	
Total EBITRm		-$ 5,443	Total Earnings Before Interest, tax, rent, and management wage
EBITRm/ha (4.42 ha)		-$ 1,231	Earnings Before Interest, tax, rent, and management wage over effective area

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APPENDIX B: RELEVANT REGULATIONS REGARDING PRIMARY PRODUCTION

South Waikato Proposed District Plan – Operative in part version March 2024

Objective GRUZ-01

» To maintain the productive capabilities of the rural land resource for primary production activities.

Policy GRUZ-P1

» Maintain the availability of the rural land resource to be used for primary production purposes.

Waikato Regional Policy Statement

Within the land and freshwater section of the Waikato Regional Policy Statement, there is a provision that addresses development and use of high class soils. "*The value of high class soils for primary production is recognised and high class soils are protected from inappropriate subdivision, use or development.*" The definition of high class soils are "*those soils in Land Use Capability Classes I and II (excluding peat soils) and soils in Land Use Capability Class IIIe1 and IIIe5, classified as Allophanic Soils, using the New Zealand Soil Classification.*" Primary production is defined as *"the commercial production of raw material and basic foods, and which relies on the productive capacity of soil or water resources of the region. This includes the cultivation of land, animal husbandry/farming, horticulture, aquaculture, fishing, forestry, or viticulture. It does not include hobby farms, rural residential blocks, or land used for mineral extraction."*

High Class Soils Definition

» High Class Soils has the same meaning as in the Waikato Regional Policy Statement.

"High class soils - those soils in Land Use Capability Classes I and II (excluding peat soils) and soils in Land Use Capability Class IIIe1 and IIIe5, classified as Allophanic Soils, using the New Zealand Soil Classification."

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Contact

Jeremy Hunt

Agribusiness Environmental Consultant

[redacted]

AgFirst Waikato (2016) Ltd
26D Liverpool Street
PO Box 9078, Hamilton 3240, New Zealand
[redacted]
www.agfirst.co.nz

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ATTACHMENT B

20 Frances Street, Tīrau — property boundary and requested zoning

Submission by Monkey Do Limited on Proposed Plan Change 4 (Urban Growth) · Record of Title SA51C/825 · 5.8281 ha



Land in Record of Title SA51C/825 — the three parcels comprising 20 Frances Street

Extent of the property for which rezoning is sought

RELIEF SOUGHT

Rezone the entirety of the land shown — Lot 1 DPS 63682, Lot 8 DPS 13093 and Part Lot 1 DPS 13093, Record of Title SA51C/825, 5.8281 ha — from General Rural Zone to Rural Lifestyle Zone. Alternatives: Residential Future Urban Zone, or General Residential Zone.

Base map and parcel data: South Waikato District Council Public Main Maps, accessed 31 August 2026. Zone extents are as shown on the operative District Plan and Plan Change 4 planning maps.

FORM 5 · SUBMISSION ON A PUBLICLY NOTIFIED PROPOSED PLAN CHANGE

Submission by Monkey Do Limited

Clause 6 of Schedule 1, Resource Management Act 1991

Proposed plan change	South Waikato District Plan — Proposed Plan Change 4 (Urban Growth)
Submitter	Monkey Do Limited
Contact person	Mark Watkins, Director
Postal address	20 Frances Street, Tīrau 3410
Email	mb.watkins@outlook.com
Phone	[redacted]
Property concerned	20 Frances Street, Tīrau 3410 — Lot 1 DPS 63682, Lot 8 DPS 13093 and Part Lot 1 DPS 13093, Record of Title SA51C/825, 5.8281 ha
Lodged with	South Waikato District Council, Private Bag 7, Tokoroa 3444 · submissions@southwaikato.govt.nz
Submissions close	5.00pm, Wednesday 2 September 2026
Date	31 August 2026

1. Trade competition

The submitter could not gain an advantage in trade competition through this submission. This submission is made by the owner of the land to which it relates and does not relate to trade competition or the effects of trade competition.

2. Hearing

The submitter wishes to be heard in support of this submission. If others make a similar submission, the submitter will consider presenting a joint case with them at the hearing.

3. Overall position

Monkey Do Limited supports the purpose of Proposed Plan Change 4 in providing appropriately located land for the future growth of Tīrau, and does not seek to displace any growth cell. The submitter opposes Plan Change 4 to the extent that it leaves 20 Frances Street in the General Rural Zone and provides no long-term zoning response for this isolated urban-edge property.

The submitter also opposes Plan Change 4 to the extent that it removes substantially all of Tīrau's Rural Lifestyle Zone and provides no replacement rural lifestyle capacity anywhere at Tīrau, without evaluating that outcome.

The submitter seeks Rural Lifestyle Zone. General Residential Zone is retained as a second preference, and Residential Future Urban Zone as a third, so that the submission preserves scope for the most appropriate response after evidence and hearing consideration. The submitter asks the Council to note that these are ranked, not equivalent.

Future Urban Zone is sought only on a qualified basis. Under Plan Change 4, subdivision in the Future Urban Zone is a non-complying activity under SUB-R3(6) and farming remains the dominant permitted activity until the land is rezoned through a further plan change. Future Urban zoning of the Site, on its own, would therefore deliver no change of use for many years. The submitter accepts Future Urban Zone as relief only if it is accompanied by a development area plan and staging and infrastructure provisions that establish a defined pathway to live zoning. Future Urban Zone without those provisions is not accepted as relief that meets this submission.

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4. Specific provisions and decisions sought

PC4 provision	Position	Reasons	Decision sought
Planning maps for Tīrau and the zoning of 20 Frances Street	Oppose in part	The maps retain an isolated urban-edge property in the General Rural Zone. Rural Lifestyle zoning is a proportionate response to its physical containment, productive constraints and transition between town and rural land. Reasons at sections 6.1 to 6.7 and 6.10 to 6.11.	Primary relief: rezone the whole property to Rural Lifestyle Zone and make all consequential changes required to apply that zone coherently.
PC4 as a whole — provision for rural lifestyle land at Tīrau	Oppose in part	PC4 converts Growth Cells 2 and 3 from Rural Lifestyle Zone to General Residential Zone and reverts the Parapara Road land east of the rail corridor to General Rural Zone, leaving Tīrau with no replacement rural lifestyle capacity. Neither the Housing and Business Capacity Assessment, the Growth Plan nor the section 32 report evaluates rural lifestyle demand or the effects of removing it. Reasons at section 6.4.	Amend PC4 to provide replacement rural lifestyle zoned land at Tīrau, including by rezoning 20 Frances Street to Rural Lifestyle Zone. Examine whether other land adjoining Tīrau should also be included in the Rural Lifestyle Zone so that the replacement capacity is adequate.
Tīrau Residential Future Urban Zone map and associated provisions	Oppose in part	If neither Rural Lifestyle nor General Residential zoning is accepted, the site should at minimum be recognised and protected for planned future urban use rather than remaining General Rural Zone. Future Urban Zone alone delivers no change of use, because SUB-R3(6) makes subdivision non-complying and farming remains the dominant permitted activity until a further plan change.	Third preference: include the whole property within the Residential Future Urban Zone, together with a development area plan and staging and infrastructure provisions establishing a defined pathway to live zoning. Future Urban Zone without those provisions is not accepted as adequate relief.
Tīrau residential growth-cell maps and General Residential Zone provisions	Oppose in part	If Council is satisfied that urban rezoning tests and servicing requirements are met, the property can form a contained extension to Tīrau rather than sporadic development in an open rural environment.	Second preference: rezone the whole property General Residential Zone and identify it as an additional Tīrau residential growth cell.
PC4 strategic direction, urban growth, infrastructure, transport, subdivision and development-area provisions insofar as they identify or enable Tīrau growth	Support in part and oppose in part	The overall direction is supported, but the provisions should apply to 20 Frances Street once it is included in the urban-growth framework.	Amend relevant objectives, policies, rules, schedules, development-area plans and infrastructure and transport mapping so that they appropriately provide for the site and do not preclude its staged development.
Any consequential provision, definition, schedule, appendix or map	Oppose in part	Consequential amendments may be necessary to give coherent effect to the requested zoning and avoid accidental procedural restriction.	Make any further or consequential amendments necessary to give effect to the relief above, including equivalent or alternative relief that achieves recognition of the property for future growth.

5. Reasons for the submission — in short

- The property is a logical urban-edge extension of Tīrau. Residential zoning lies to the south, General Industrial Zone to the east and south-east, and the Tīrau Golf Club forms the northern and western boundary.
- The golf course, the township and the site's gully have permanently isolated the property from productive farming land. Amalgamation with a viable rural production unit is not possible.
- That isolation is not new and was not created by the owner. Under the 1994 District Plan the golf course was zoned Urban Protection Zone and later Reserve Zone, leaving the site as an isolated pocket of Rural Zone between that transitional zone and the Residential and Industrial B Zones.
- AgFirst inspected the site and assessed it against the NPS-HPL. Although the regional-scale NZLRI overlay maps the site as LUC 2s1, AgFirst identified approximately 2.3 hectares as potentially highly productive, with the balance affected by modified soils, wetness, slope, gully land, buildings and curtilage.
- AgFirst assessed approximately 4.42 hectares as available for production and calculated an indicative annual EBITRm loss of $5,443, equivalent to negative $1,231 per effective hectare, against rates of $5,759.71 a year. It concluded that pastoral grazing is not economically viable and that the constraints cannot practicably be overcome.
- PC4 removes Tīrau's rural lifestyle capacity and replaces none of it. No part of the evaluation considers rural lifestyle demand or the effects of its removal. That is a gap in the section 32(1)(b) evaluation, and one Council can close through its decision on submissions.
- The relief is not merely permitted by the Growth Plan; it is what the Growth Plan asks for. The Growth Plan seeks a range of housing types, an oversupply of land to encourage competition, and different typologies at different price points. A range of housing types implies a range of land sizes, and rural lifestyle is the typology Plan Change 4 reduces to nil at Tīrau.
- Rural Lifestyle zoning would avoid fragmentation of an operating rural production unit. The site lies at the outer edge of the broadly mapped LUC 2 area, so its rezoning would not split a large, geographically cohesive area into separate parts.
- The primary Rural Lifestyle relief is advanced under clauses 3.7 and 3.10 of the NPS-HPL. It is more proportionate to the site constraints than assuming immediate full urban development and provides a managed transition at Tīrau's edge.
- Desktop option testing indicates a possible yield of roughly nine to eleven rural-lifestyle lots, based on an indicative average of about 5,000 square metres and a minimum of about 2,500 square metres. This is not a subdivision proposal and remains subject to survey, access, hazards, infrastructure and detailed design.
- The property is within the 1 km industrial buffer identified in the District Plan. Any rural-lifestyle subdivision would therefore remain discretionary under SUB-R3(2)(b) and would require assessment of reverse-sensitivity and other effects. Rezoning would not itself authorise subdivision.
- The site is close to existing urban roads and services. Council water and wastewater mains are already reticulated in Frances Street on the southern boundary. Its inclusion would allow infrastructure, transport, stormwater and hazard matters to be addressed comprehensively through structure planning, development-area provisions and subsequent consenting.
- Residential Future Urban and General Residential zoning remain appropriate alternatives, but those urban options must separately satisfy clause 3.6 of the NPS-HPL, including the applicable capacity, alternatives and cost-benefit tests.

6. Detailed planning basis

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6.1 The submitter, the site and its context

1. Monkey Do Limited is the registered owner of 20 Frances Street, Tīrau, comprising Lot 1 DPS 63682, Lot 8 DPS 13093 and Part Lot 1 DPS 13093, contained in Record of Title SA51C/825, with a total area of 5.8281 hectares (the Site). Plan Change 4 does not propose any change to the zoning of the Site.

2. The Site sits on the northern edge of the Tīrau township and forms part of the boundary between the urban environment and the surrounding rural environment. The General Residential Zone lies to the south, immediately across Frances Street. The General Industrial Zone, containing the Fonterra Tīrau factory, lies to the east and south-east and the Site forms part of its boundary. The Tīrau Golf Club adjoins the Site along its northern and western boundaries and, together with the township and the highway, effectively land-locks the Site in a planning and land-use sense.

3. The Site is a through site with two road frontages — Frances Street, a local road, and State Highway 27. Existing vehicle access is from Frances Street. An unnamed tributary of the Ōraka Stream runs along the south-eastern extent of the Site within a gully carrying a mapped 100-year flood extent. A power sub-transmission line crosses part of the western boundary and part of the eastern extent of the Site lies within a Noise Control Boundary.

4. Of the 5.83 hectares, approximately 4.42 hectares is effective pasture and approximately 1.39 hectares is gully and house curtilage that is stock-excluded and non-effective. There is one dwelling on the Site, which is currently grazing a small number of beef cattle.

5. The three interests recorded on the title — section 206 Land Act 1924, section 308(4) and (5) Local Government Act 1974, and section 5 Land Act 1948 — do not present any impediment to the relief sought.

6. The submitter supports the general direction of Plan Change 4 and its purpose of providing sufficient land to meet the district's needs to 2054. This submission is directed at one gap in the plan change: the absence of any replacement rural lifestyle capacity at Tīrau, and the corresponding failure to recognise the Site as the logical location for it.

6.2 What Plan Change 4 does at Tīrau

7. At Tīrau, Plan Change 4 proposes: Growth Cell 1 (Church Street) from General Rural Zone to General Residential Zone; Growth Cell 2 (Parapara Road west) from Rural Lifestyle Zone to General Residential Zone; Growth Cell 3 (Parapara Road east) from Rural Lifestyle Zone to General Residential Zone; a Residential Future Urban Zone at Parapara Road west and an Industrial Future Urban Zone on State Highway 27, both from General Rural Zone; and the reversion of Parapara Road land east of the railway line from Rural Lifestyle Zone to General Rural Zone. Growth Cell 3 and the Parapara Road reversion are of key relevance to this submission, because between them they remove Tīrau's rural lifestyle capacity.

8. All of Tīrau's residential growth is therefore directed to the south and south-west of the township, and all of the town's existing rural lifestyle zoned land is either absorbed into the General Residential Zone or returned to the General Rural Zone.

9. Plan Change 4 identifies a need for 4.3 hectares of additional residential land at Tīrau — the Housing and Business Capacity Assessment 2023 figure of 3.7 hectares plus a competitiveness margin. The submitter does not dispute that figure and does not seek to displace any growth cell. The relief sought is additive and is for a different zone type.

6.3 The relief sought is within the scope of Plan Change 4

10. Plan Change 4 is a plan change about the zoning of land in and around Tīrau for growth, and it alters the extent of the Rural Lifestyle Zone at Tīrau in three separate places. A submission seeking to remedy the rural lifestyle shortfall that Plan Change 4 itself creates addresses the change to the status quo that the plan change advances. It is not an unrelated matter raised opportunistically.

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11. Plan Change 4 also rezones land to Rural Lifestyle Zone — the land between Alexander Crescent and Walsall Rise at Putāruru is rezoned from General Rural Zone to Rural Lifestyle Zone. Rural lifestyle rezoning is therefore squarely part of what Plan Change 4 does, in both directions.

12. If the Council nevertheless considers the site-specific relief to be beyond scope, the submitter asks the Council to address the self-created rural lifestyle shortfall at Tīrau by way of a variation under clause 16A of Schedule 1 to the Act, or to record in its decision that it would support a subsequent plan change for that purpose.

6.4 Plan Change 4 removes Tīrau's rural lifestyle land without replacing it

13. Plan Change 4 converts Growth Cells 2 and 3 from Rural Lifestyle Zone to General Residential Zone, and converts the rural lifestyle land east of the railway line at Parapara Road to General Rural Zone. It provides no replacement rural lifestyle zoned land anywhere at Tīrau. The effect is that Tīrau will be left with little or no rural lifestyle capacity, while gaining residential, future urban residential and future urban industrial land.

14. This outcome has not been evaluated. The Housing and Business Capacity Assessment 2023 and the Growth Plan 2024–54 assess residential, commercial and industrial demand; neither assesses rural lifestyle demand or supply. The section 32 report contains no evaluation of rural lifestyle capacity anywhere in the district, and no assessment of the costs and benefits of removing it at Tīrau — Table 2 records the reversion of the land east of the rail corridor in a single line, without reasons. The submitter respectfully submits that this is a gap in the evaluation required by section 32(1)(b) of the Act, and one the Council can readily close through its decision on submissions.

15. Rural lifestyle demand at Tīrau is real and is being met on the open market. Recent sales of lifestyle properties in the immediate area include 53 Parapara Road (1.5 ha, October 2025), 85 Paparamu Road, Piarere (1.04 ha, $800,000, July 2025) and 261 Parapara Road (1.09 ha, $520,000, February 2025).

16. The relief is not merely permitted by the Council's own policy. It is what that policy asks for. Housing choice and housing affordability are separate objectives and are not in conflict. Rural lifestyle land is not affordable land, but it is choice, and it sits at a point on the residential spectrum that Plan Change 4 removes from Tīrau altogether.

17. The South Waikato Growth Plan 2024–54 records at section 2.5.1 that "We will need a range of housing types over the next 30 years to meet the needs of our communities now and into the future and to contribute to a well-functioning urban environment". A range of housing types necessarily implies a range of site sizes. The Growth Plan is directed principally at the more affordable end of that range; the submitter submits that provision at the less affordable rural lifestyle end is equally part of a well-functioning urban environment, and that Tīrau is now to have none of it.

18. The Growth Plan records at section 2.5.1.3, under the heading Hidden Shortfall, that "The South Waikato Growth Plan responds to and plans for the 27-hectare shortfall as well as the hidden shortfall through ensuring an oversupply of land available for development to encourage competition in the market and enabling the development of different typologies at different price points that give our community more choice". The outcome this submission seeks is precisely that outcome. Rural lifestyle is a distinct typology at a distinct price point, and Plan Change 4 currently reduces it to nil at Tīrau.

19. The Growth Plan records at section 2.5.2 that growth in economic activity "will require additional land area to support increases in job growth and to meet the needs of the community". Plan Change 4 provides that additional business and industrial land at Tīrau, including a new Industrial Future Urban Zone. The owners and managers of those activities are among the people most likely to want a rural lifestyle option close to the township. Providing the land for the jobs while removing the residential typology those jobs generate demand for is not an integrated outcome.

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20. The Site is the logical location for the replacement capacity. Rural lifestyle zoning at 20 Frances Street would restore capacity lost at Parapara Road on land that is closer to the township, already served by reticulated infrastructure, and has no realistic productive future.

6.5 The Site cannot be farmed economically, and that will not change

21. The AgFirst Assessment concludes that the Site is not economically viable for land-based primary production and cannot be made so. Under its highest and best land-based use — pastoral grazing — the indicative budget shows earnings before interest, tax, rent and management wage of negative $1,231 per effective hectare, a total operating loss of $5,443 a year, and a loss of $20,563 a year after debt servicing. Rates alone are $5,759.71 a year.

22. The constraints identified are permanent, not managerial. The Site has been isolated from all other pastoral land since the golf course was established between 1971 and 1976, and is bounded by the golf course to the north and west and by the township to the south and east, so amalgamation with, or lease of, adjoining productive land is not economically or practically possible. At 4.42 hectares of effective area it is a fraction of the 251 hectare average for Northern North Island finishing class land. Mottling was found in all gully samples; the gully is steep and wet and stocking is constrained through winter. The only access to the productive area is over a small bridge across the stream, which cannot carry large or heavy machinery.

23. Retaining the General Rural Zone over the Site therefore protects nothing. It preserves a zoning that produces an annual loss, on land that cannot be aggregated, farmed at scale, or reached by machinery.

6.6 The isolation of the Site is historic and was created by planning, not by the owner

24. Under the South Waikato Proposed District Plan of 21 July 1994, the golf course land was within the Urban Protection Zone — a transitional zone along the urban edge — and the Site was identified as an isolated pocket of Rural Zone sitting between that transitional zone and the Residential and Industrial B Zones. A Council file note of 2 February 2004 and related correspondence record that the golf club site was by then within the Reserve Zone.

25. The Site has therefore been an isolated, rurally zoned remnant, disconnected from the wider productive rural environment, for more than three decades, as a result of successive zoning decisions rather than anything the submitter has done. The golf club land forms the natural boundary between the rural and urban environments at this part of Tīrau, and the productive rural environment lies beyond it. Recognising that boundary in the planning maps is the relief this submission seeks.

26. That history also answers the precedent and plan-integrity concern. The combination of an urban-edge location, a golf course on two boundaries, industrial and residential zoning on the others, a gully with a mapped flood extent, and a historic transitional zoning is not a combination that can be repeated elsewhere in the district.

6.7 The NPS-HPL: clause 3.7 and the clause 3.10 tests

27. The soils at the Site are mapped under the New Zealand Land Resource Inventory as LUC unit 2s1. The submitter accepts that LUC 2 land is highly productive land and that the NPS-HPL applies. The NPS-HPL Amendment 2025, in force from 15 January 2026, released LUC 3 land but not LUC 2 land, so this remains the position.

28. The AgFirst Assessment found that only approximately 2.30 hectares of the Site actually meets the definition of highly productive land. Approximately 1.05 hectares consists of modified soils from historic cut and fill, visible in 1971 aerial imagery, and the gully areas are steeper than 15 degrees and are inundated more than once a year for longer than two days. The area genuinely in issue is small.

29. Clause 3.7 generally requires rural lifestyle rezoning of highly productive land to be avoided except as provided by clause 3.10. The primary relief therefore relies on clause 3.10, not on the urban-rezoning pathway in clause 3.6. The evidence must establish permanent or long-term constraints making land-based

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primary production not economically viable for at least 30 years, together with the other clause 3.10 requirements concerning district-wide loss, cohesive areas, reverse sensitivity, benefits and costs, and reasonably practicable alternatives.

30. On the cohesive-area test, the submitter puts its case on a narrower and more durable basis than the AgFirst Assessment. The Site forms part of the outer edge of a broadly mapped area of LUC 2 soils. The question the test asks is whether rezoning would fragment a large and geographically cohesive area — that is, split it into separate parts. Rezoning land at the outer edge does not do so. It reduces the area at its margin, which is a matter for the individual and cumulative loss test rather than the fragmentation test, and on that test the relevant area is the approximately 2.30 hectares AgFirst identified.

31. The Council has already accepted, within Plan Change 4 itself, that other LUC 2 land at Tīrau may be rezoned where the site-specific circumstances justify it. The Tīrau Industrial Future Urban Zone opposite MacMillan Road is LUC 2, and Table 3 of the section 32 report supports its rezoning on the basis that the land is consented for sand mining, is lost to primary production in the longer term, and that there are no other reasonably practicable and feasible alternative locations on lesser quality land. The Site's circumstances are at least as compelling, and are supported by an independent expert assessment rather than an assertion.

6.8 Evidence supplied, and matters the submitter will supplement

32. AgFirst assessed scale, fragmentation, access, soil modification, slope, wetness, grazing economics and alternative production. It provides a foundation for clause 3.10. The submitter does not overstate it, and identifies for the Council the matters on which further evidence should be provided before the hearing.

- The practicability and economics of horticulture, cropping and other land-based primary production over at least 30 years. The submitter records openly that part of the Site was used as an orchard from approximately 1981 until the early 2000s, and that the Waikato Regional Council Land Use Information Register records the Site as an unverified HAIL site (activity A10, persistent pesticide bulk storage or use) in consequence. The AgFirst Assessment addresses grazing as the highest and best use; the horticultural question will be addressed expressly.
- Whether the adjoining golf course land could in practice be returned to rural productive use, which is the assumption on which the non-reversible fragmentation conclusion rests.
- Cumulative and district-wide loss of highly productive land, on which the submitter invites the Council to state its own position, since it turns on district-wide subdivision patterns known to the Council rather than to the submitter.
- A qualitative and quantitative benefits and costs table across the environmental, social, cultural and economic spheres, as clause 3.10(1)(c) requires.
- Reverse-sensitivity mitigation, addressed in section 6.10 below.

33. The submitter has also obtained a planning due diligence assessment from The Property Group Limited (Robertson Land Surveys instruction, 10 October 2024), which considered a fee simple subdivision of the Site and canvassed the alternative of rezoning. Its recommendation was that the rezoning option be explored with the Council. This submission is the first step in doing so. The submitter's options assessment material is desktop scoping and background only, and is not presented as expert planning evidence.

6.9 Urban-zoning alternatives: NPS-HPL clause 3.6

34. Residential Future Urban and General Residential relief are retained as alternatives. Because South Waikato is not a tier 1 or 2 territorial authority, an urban-rezoning decision must separately address clause 3.6(4) — whether the urban zoning is required to provide sufficient development capacity, whether there are reasonably practicable and feasible alternatives, and whether the benefits outweigh the costs associated with the loss of highly productive land.

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35. As the section 32 report records, clause 3.6(6), inserted in December 2025, exempts only LUC 3 land from those tests. An urban rezoning of this LUC 2 land would engage them in full. A rural lifestyle rezoning is assessed instead under clause 3.7, against the clause 3.10 tests, on which the submitter already holds an independent expert assessment. That is why rural lifestyle is sought as the primary relief and urban zoning as the alternative, and why further evidence on capacity and alternatives may be required before an urban alternative can be preferred.

6.10 Reverse sensitivity, natural hazards and infrastructure

36. The submitter acknowledges that the Site lies wholly within the mapped 1 kilometre buffer from the General Industrial Zone boundary at Tīrau, and that under SUB-R3(2)(b) subdivision within that buffer is a discretionary activity in both the General Rural Zone and the Rural Lifestyle Zone. The submitter does not seek any change to that rule and does not seek to avoid it.

37. Rural lifestyle zoning is a better response to that context than general residential zoning: it produces fewer households, on larger lots, with greater separation and greater capacity for internal setbacks and planting. Reverse sensitivity can then be assessed and conditioned at subdivision stage, and the submitter is willing to offer no-complaints covenants in favour of the industrial zone on any new titles. The nearest effluent treatment pond is approximately 440 metres from the Site boundary, comfortably beyond the 300 metre separation required by SUB-R5(3)(j).

38. The gully and its mapped 100-year flood extent — approximately 1.39 hectares, already stock-excluded and non-effective — would be retained undeveloped and subject to landscape enhancement. That is consistent with the natural hazard provisions introduced by Plan Change 4, and would deliver an ecological, stormwater and amenity benefit that the current grazing use does not.

39. Council water and wastewater mains are already reticulated in Frances Street on the Site's southern boundary. The South Waikato Growth Plan 2024–54 identifies a Frances Street booster pump and a 200 mm water main upgrade along State Highway 1 among Tīrau's planned infrastructure works, and records that Tīrau's potable water supply is nearing peak capacity. Rural lifestyle zoning, at a minimum lot size of 2,500 m² and an average of 5,000 m² under SUB-R5, would yield in the order of nine to eleven lots across the Site. That is a materially smaller demand on water, wastewater and stormwater infrastructure than an equivalent area of General Residential Zone, and it can be staged.

40. Vehicle access would continue to be taken from Frances Street, a local road. No new state highway access is sought or required, notwithstanding the Site's State Highway 27 frontage. At a yield in the order of nine to eleven lots, the traffic generated is unlikely to place any significant additional demand on the Frances Street and State Highway 27 intersection. Esplanade reserve and esplanade strip requirements are not anticipated: the watercourse is an unnamed tributary rather than the Ōraka Stream itself, and the Site is not upstream of Okoroire Road.

41. The submitter does not seek to bypass subsequent technical assessment. Development would remain subject to appropriate infrastructure, transport, stormwater, natural-hazard, ecological, contaminated-land, landscape and subdivision requirements. The requested relief establishes the correct strategic land-use direction; it does not predetermine any subdivision consent.

6.11 The alternative that exists in any event

42. For completeness, the submitter records that a comparable number of allotments could in principle be achieved under the existing General Rural Zone provisions. SUB-R5(3)(b) limits subdivision to two sites per subdivision application rather than per title, so successive applications could in time create a similar number of allotments before the 4 hectare minimum parent area is reached. The submitter does not suggest that the Site cannot otherwise be subdivided.

43. That is not, however, an equivalent planning outcome. Successive subdivision would mean six to eight separate consents, each lodged against the balance of the one before it and each assessed in isolation, with

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every allotment served by its own crossing or right-of-way onto Frances Street — no roading pattern, no staged servicing and no integrated design. That is the incremental fragmentation of the rural edge that objective GRUZ-O1 and policy GRUZ-P7 seek to avoid, and it is available to any owner of the Site whether or not this submission succeeds. A Rural Lifestyle rezoning achieves the same yield once, on a planned basis, with access, servicing and lot layout able to be assessed as a whole. That is the more efficient use of the land and the better planning outcome, and it is what the submitter seeks.

44. The Site has never been assessed for its growth potential. It was not among the areas tested in the Development Area Plans Report 2024, and it is not referred to anywhere in the section 32 report. The submitter does not suggest any oversight on the Council's part — the Site was simply not in front of it. It is now, together with the expert evidence supporting it, and the submitter asks that it be assessed on its merits.

7. Relief sought

For the reasons above, the submitter seeks the following decisions from the Council:

- First preference and primary relief: rezone the entirety of 20 Frances Street, Tīrau (Lot 1 DPS 63682, Lot 8 DPS 13093 and Part Lot 1 DPS 13093, Record of Title SA51C/825, 5.8281 hectares) from General Rural Zone to Rural Lifestyle Zone, and amend the Plan Change 4 planning maps accordingly.
- Second preference: rezone the entirety of the property to General Residential Zone and identify it as an additional Tīrau residential growth cell.
- Third preference, and on a qualified basis only: rezone the entirety of the property to Residential Future Urban Zone, together with a development area plan and staging and infrastructure provisions establishing a defined pathway to live zoning. Future Urban Zone without those provisions is not accepted as relief that meets this submission.
- Amend Plan Change 4 to provide replacement rural lifestyle zoned land at Tīrau to offset the rural lifestyle capacity removed by Growth Cells 2 and 3 and by the rezoning of land east of the railway line.
- Examine whether other land adjoining Tīrau should also be included in the Rural Lifestyle Zone, so that the replacement capacity provided is adequate to meet demand rather than nominal.
- Apply or create appropriate development-area, staging, infrastructure, transport, reverse-sensitivity and information requirements for the property, suited to whichever zoning relief is granted.
- Amend all relevant maps, objectives, policies, rules, appendices and schedules consequentially.
- Grant any other similar, consequential or alternative relief within the scope of this submission that better achieves the submitter's objective of formally recognising an appropriate long-term use for the property.

8. Evidence supplied

Attachment A	AgFirst Waikato (2016) Limited, Assessment Against NPS-HPL — 20 Frances Street, Tīrau, prepared for Monkey Do Limited by S Alexander, final dated 26 June 2024.
Attachment B	Property boundary and requested zoning plan.

The submitter holds further material referred to in this submission, including the planning due diligence prepared by The Property Group Limited dated 10 October 2024, correspondence with South Waikato District Council and Waikato Regional Council concerning the growth strategy and LUC mapping, and its own options assessment. That material can be provided to the Council on request or produced with evidence before the hearing.

9. Signature

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This submission is lodged by electronic means. The note to Form 5 in Schedule 1 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003 provides that a signature is not required if a submission is made by electronic means.

Authorised person	Mark Watkins, Director, for and on behalf of Monkey Do Limited
Email	mb.watkins@outlook.com
Phone	[redacted]
Address for service	20 Frances Street, Tīrau 3410
Date	31 August 2026

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