PROPOSED PLAN CHANGE 4 TO THE SOUTH WAIKATO DISTRICT PLAN - URBAN GROWTH

SUBMISSION FORM

RESOURCE MANAGEMENT ACT 1991 - FORM 5

Send to: South Waikato District Council, Private Bag 7, Tokoroa 3444
Email to: submissions@southwaikato.govt.nz
Fill in the online form at: https://www.southwaikato.govt.nz/
Drop off in person: Council Office, Torphin Crescent, Tokoroa (Monday to Friday)
(Submissions must be received by Council by **5.00pm on Wednesday 2 September 2026**

All sections of this form need to be completed for your submission to be accepted.

1. SUBMITTER DETAILS

I am making a submission as (please select one)

☐ An individual
OR
Ξ On behalf of an organization*

*Name of organization: South Waikato Farms Limited

*Position Title: -

Full Name of Submitter: Blue Wallace Surveyors Ltd

Contact name (if different from above): Tim Lester

Address for Service of the Submitter: PO Box 38 | 25 Harwood St | Hamilton 3240

Contact phone number(s): [redacted]

Email: Tim.lester@bluewallace.co.nz

Privacy information

The information you have provided at section 1 is required so that your submission can be processed under the RMA. The information will be stored and held by the Council on a public register and will also be made available to the public on the Council's website. This is required because a person who wishes to make a further submission on your submission is required to serve their further submission on you. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

2. TRADE COMPETITION

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

I am not directly affected by an effect of the subject matter of the submission that-

a) adversely affects the environment; and

b) does not relate to trade competition or the effects of trade competition.

3. ATTENDANCE AT COUNCIL HEARING

I / WE *(Tick appropriate)*

[X] **WISH TO BE HEARD** (attend and speak at the Council hearing) in support of my / our submission)

[ ] **DO NOT WISH TO BE HEARD** in support of my / our submission

If others make a similar submission, **I / WE** *(Tick appropriate)*

[X] **WILL** consider presenting a joint case with them at a hearing

[ ] **DO NOT** wish to present a joint case with them at a hearing

4. SIGNATURE OF SUBMITTER

(Note: A signature is not required if you make your submission by electronic means)

Tim Lester

Signature (Submitter / or person authorised to sign on behalf):

Date: 02/09/2026

5 THE SPECIFIC PROVISIONS OF THE PROPOSED PLAN CHANGE THAT MY SUBMISSION RELATES TO ARE (Attached):

5.

SOUTH WAIKATO DISTRICT COUNCIL

GUIDELINES FOR MAKING A SUBMISSION

Any person can make a submission on a Proposed District Plan Change in accordance with Clause 6 of the First Schedule of the Resource Management Act 1991. If you are a person who could obtain an advantage in trade competition through the submission, your right to make a submission may be limited by Clause 6(4) of Schedule 1 of the Resource Management Act 1991.

Form 5 (attached) provides the correct form in which submissions are to be made. You do not have to follow the format we have provided at (5) to detail the specific provisions of the Proposed Plan Change your submission relates to, but you must provide the information set out at (1) to (4) – submitter details, trade competition, attendance at Council hearing and signature. Failure to comply with this form can result in a submission not being validly made.

An invalid submission may jeopardise your opportunity to present your submission before the Hearings Committee, and your opportunity to appeal the outcome of the decision.

Therefore, you will need to ensure that:

1. The form is filled out as accurately and as completely as possible.

2. Your submission is received by the Council before submissions close at **5:00pm on Wednesday 2 September 2026.**

Your submission can be lodged by:
Sending it to: South Waikato District Council, Private Bag 7, Tokoroa 3444
Emailing: submissions@southwaikato.govt.nz
Dropping it into: Council Office, Torphin Crescent, Tokoroa (Monday to Friday)
Filling in the online form at: https://www.southwaikato.govt.nz/

If you have any queries in relation to making a submission, please contact Eshrita Lata using the following contact details:

Phone: [redacted]

Email: Eshrita.Lata@southwaikato.govt.nz

Write to: Planning Department
South Waikato District Council
Private Bag 7
Tokoroa 3444

Submission on Proposed Plan Change 4 to the South Waikato District Plan

To **South Waikato District Council**

Private Bag 7

Tokoroa 3444

New Zealand

Sent via email to: submissions@southwaikato.govt.nz

Eshrita.Lata@southwaikato.govt.nz

FROM: *South Waikato Farms Limited*

c/- Blue Wallace Surveyors Limited

PO Box38

Hamilton 3240

(attention: Tim Lester)

Date 2 September 2026

Title	*Proposed Plan Change 4 to the South Waikato District Plan*
Address for Service	*Blue Wallace Surveyors Ltd* *PO Bo38* *Hamilton 3240* *Attention –Tim Lester* *tim.lester@bluewallace.co.nz*
Client's name	*South Waikato Farms Limited*

Submission Introduction

1.1 Our client, South Waikato Farms Limited (referred to as 'the Submitter') are the registered owners of a large 50ha of contiguous land holding (comprising one cohesive record of title) to the west of Putaruru that is suitable to rezone from General Rural to Rural Lifestyle Zone (RLZ) under the Proposed South Waikato Proposed Plan Change 4 (PC4) process.

1.2 The subject 50ha property of this submission is held under a single Record of Title (R.T. 1183759) and is legally described as Lot 700 DP 604309.

1.3 There are no instruments or constraints registered on the title that would restrict the land for RLZ land use.

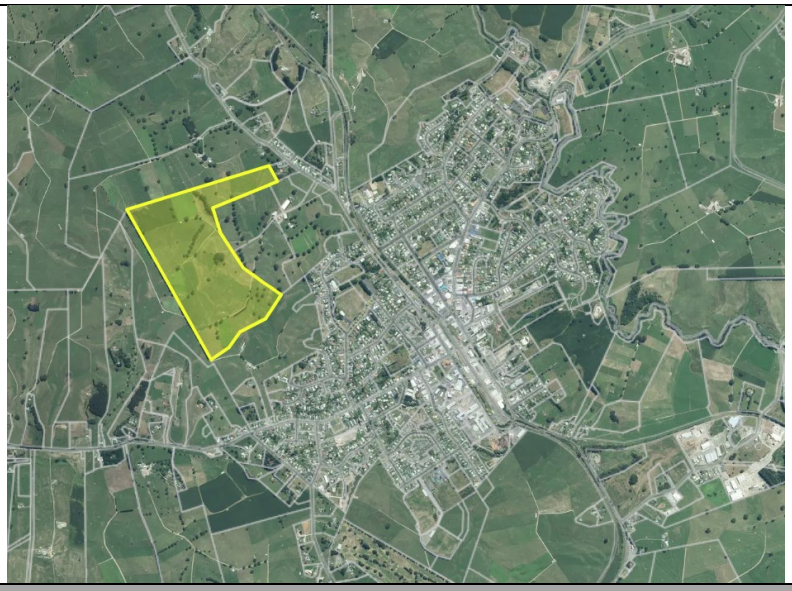

Image1: Submission Property

1.4 The area of land will be referred to in this submission under the title of *Putaruru Rural Lifestyle West (or 'PRLW')* and is shown on the Concept Development Plan contained within ***Attachment A*** to this submission. An excerpt of the attached concept plan for the PRLW area is below:

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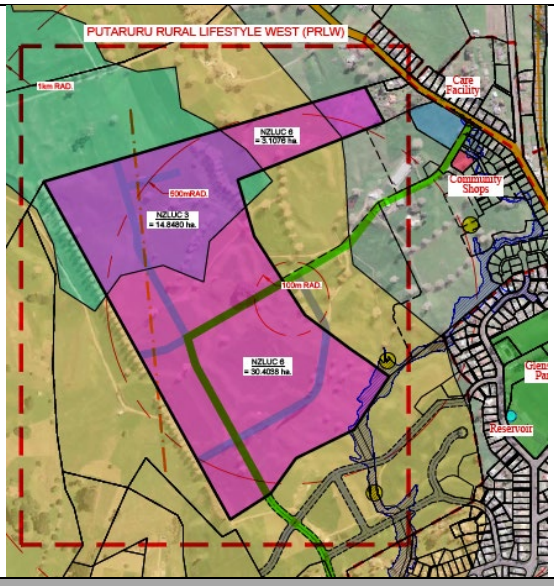

Image 2: Excerpt of PRLW Concept Plan

1.5 The South Waikato Holdings Limited owns approximately 35ha of land to the east of the PRLW area. This land is identified as Putaruru Growth Cell 1 and is zoned General Residential Zone (GRZ) under the Operative South Waikato District Plan (ODP).

1.6 An excerpt of the Putaruru Growth Cell 1 area (yellow) in the context of the PRLW area (Blue) is provided below:

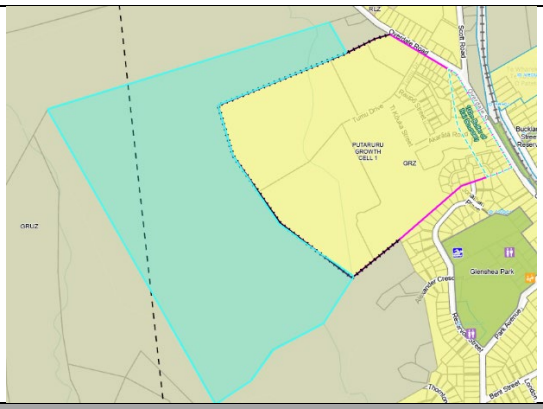

Image 3: Current GRZ and Growth Cell 1 under the Operative District Plan

1.7 In summary of this submission to PC4, the Submitter seeks to highlight the following key themes:

1. ***The PRLW is a viable consideration for rezoning under the PC4 process.***
2. ***The PRLW aligns with Council's strategic intent of future urban development within the Putaruru Township***
3. ***The PRLW is responsive to the wider environment with regard to infrastructure.***
4. ***Potential adverse effects can be managed appropriately within the proposed PRLW area.***

1.8 The purpose and intent of this submission will be to expand upon the key themes above – and thereby contribute to Council's decision-making process for PC4.

1.9 The Submitter has reviewed the content and supporting information provided with PC4 (particularly the s32 reporting) and generally agrees with the approach taken by Council to

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future-proof the townships of Tokoroa, Tirau and Putaruru population growth; however, as will be discussed in this submission, it is considered that the expansion of Putaruru's residential area could be better protected from reverse sensitivity by adopting the PRLW area.

1.10 In consideration of the points that will be made in this submission:

1. *The submitter **supports in part** the scope of PC4 relative to the Putaruru Township.*
2. *The submitter seeks amendments to the PC4 planning maps to incorporate the PRLW area.*
3. *The PRLW area is not contrary to the applicable Objectives and Policies of the South Waikato District Plan (**Attachment B**)*
4. *The submitter seeks the minor text amendments to the Operative District Plan as detailed in the attached submission table (**Attachment C**) following decision from Council which is to accept the area identified as the PRLW under the PC4 district plan review process.*

1.11 The submitter wishes to be heard in favour of their submission.

1.12 The Submitter could not gain an advantage in trade competition as a result of the decisions sought.

Scope of Submission 'on' PC4

1.13 This submission has been prepared in consideration of the Clearwater Test (i.e., the submission is 'on' the plan change). Consequently, the PRLW is a viable consideration for rezoning under the PC4.

1.14 In general, the first limb of the Clearwater Test is whether this submission reasonably falls within the scope of PC4 and whether or not the submission will materially change the extent of the plan change.

1.15 The submitter considers that the PRLW amended planning map will not significantly alter the purpose and intent of PC4 in that the sought change will provide future-proofed protection and reverse sensitivity mitigation through the provision of additional Rural Lifestyle Zoning in Putaruru.

1.16 Further to the above, the location and extent of the PRLW area represent a continuation of the RLZ already 'on' the plan immediately to the south[1], and therefore an enduring 'buffer' link between the rural zone and sensitive residential zone of Putaruru will be retained.

[1] Land owned by Tomalin Farms Limited

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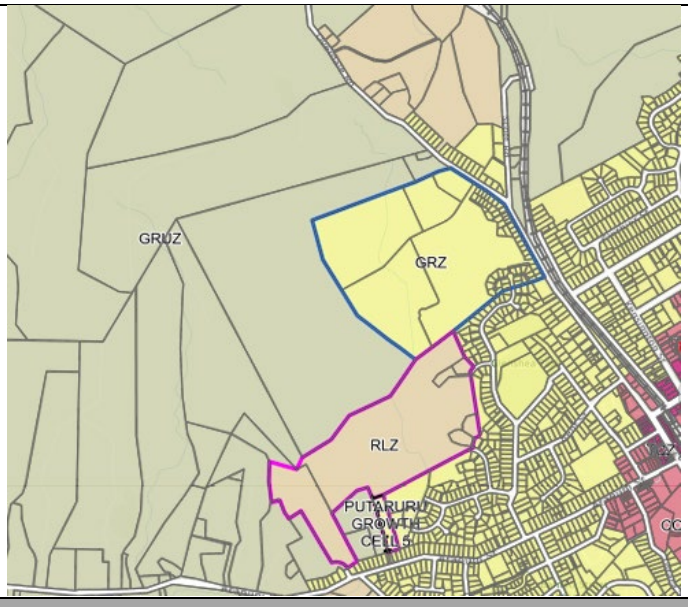

Image 4: PC4 Proposed RLZ: Putaruru

1.17 This submission to link the PRLW area with that of the notified PC4 RLZ is not considered to be out of scope (or out of 'left field') for the plan change as the sought change will not introduce unrelated topics to the planning maps nor will it introduce land zoning changes that have not already being introduced under Council's evaluation reporting.

1.18 The second limb of the Clearwater Test relates to procedural fairness and participation risk.

1.19 The Submitter contends that by introducing the PRLW area as an initial submission under the public PC4 process, that the wider community will be suitably informed of the additional RLZ area, and therefore will be presented further opportunity to provide comments or formal feedback to Council under the further submission process as provided under Schedule 1 of the RMA.

1.20 It is *not* considered that the changes sought under this submission will unfairly affect other submitters or interested parties to PC4 as it will be clearly and publicly presented under the summary of submissions report that will be issued by Council.

1.21 Such a summary of submissions will ensure all parties will not be caught 'off-guard' by the proposed PRLW area as the summary of submissions is a fair public notification process.

Submission Context

1.22 As stated in Council's consultation documentation, proposed PC4 seeks to ensure there is adequate residential, commercial and industrial land available in the South Waikato District until 2054, whilst also ensuring that future urban areas are set aside to provide the required flexibility to bring new development online as required.

1.23 According to Council's strategic growth documents, the reason behind PC4 is "*The South Waikato district is experiencing steady population growth, with Council planning for the population to reach over 34,000 people by 2053*."

1.24 This submission has been prepared by South Waikato Farms Limited as they hold a significant interest in urban development and growth of Putaruru – primarily through the advanced land use and subdivision design undertaken within the Putaruru Growth Cell 1.

1.25 Given the Submitter's interest in Putaruru, PC4 now presents itself as a suitable opportunity to robustly future proof the growth cell development through the provision of rural lifestyle

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opportunities to the west of the growth cell, which in turn will enable an appropriate buffer to be provided for the purpose of reverse sensitivity mitigation.

1.26 It is the submitters opinion that matters pertaining to reverse sensitivity need to be provided for and addressed early in the design process. Through the current Schedule 1 process an effective and enduring reverse sensitive solution above and beyond the current district reverse sensitivity mitigation[2] is presented whereby sensitive land use within the Putaruru Growth Cell 1 can be effectively ***and spatially*** protected from higher impact rural land use to the west.

1.27 The Submitter acknowledges that reverse sensitivity mitigation has already been addressed under the current district plan provisions; however, in being able to provide greater building setbacks and more effective screening allowable under RLZ provisions, an opportunity is presented under PC4 to enable *spatial buffering* to reverse sensitivity mitigation.

1.28 Notwithstanding the above, Council has directed in the PC4 supporting documents (s32 Report) that:

"Submitters are encouraged to review the Planning Maps carefully to understand whether their land or nearby land is affected".

1.29 In reviewing the PC4 maps the Submitter notes that the PRLW abuts the largest greenfield residential growth cell in Putaruru, and therefore proactively protecting this land through the sought PRLW area is being put forward by the landowner.

RLZ Suitability of Submitters Land

1.30 The proposed land use area is currently zoned GRUZ under the Operative District Plan (see Map 1 above)

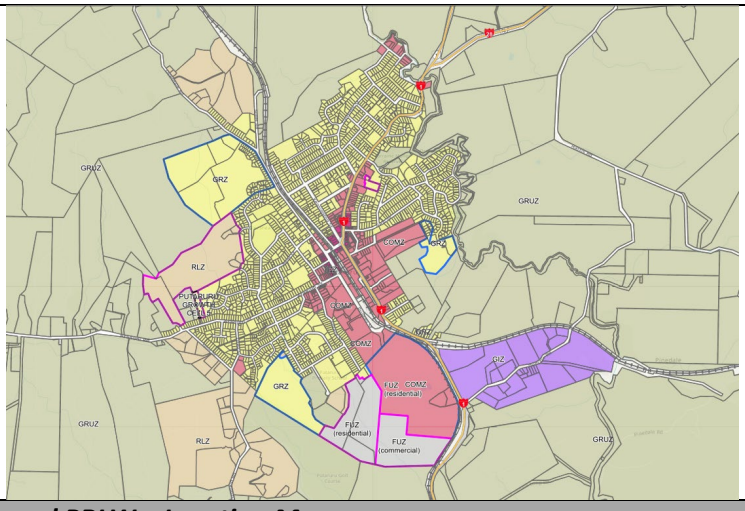

Image 5: Proposed PRLW – Location Map

1.31 The land is currently distinguished (via plan map overlay) by Reverse Sensitivity Mitigation Boundaries to the east.

[2] *provided under rule SUB.R6(1)(jj)(d)*

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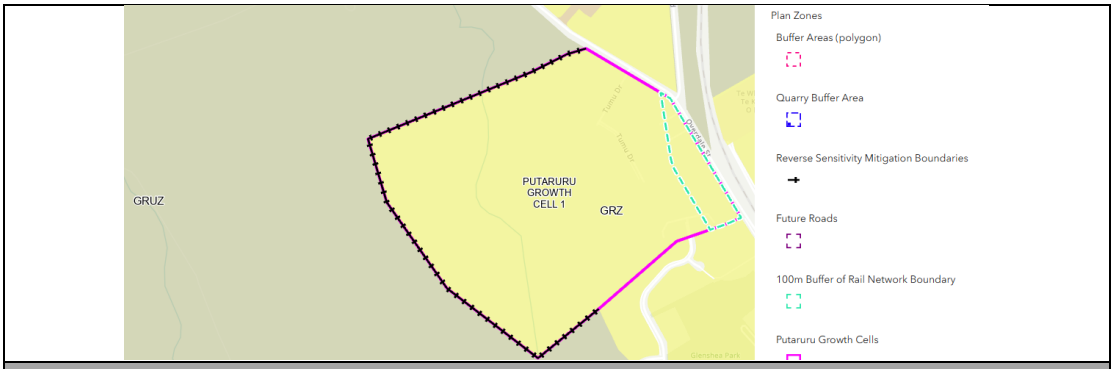

Image 6: Reverse Sensitivity Mitigation Boundaries

1.32 Pursuant to Rule SUB.R6(1)(jj)(d) any development within the Putaruru Growth Cell 1 area is required to apply consent notices "and other measures" to minimise reverse sensitivity as indicated. One such method stated in the rule is "greater setbacks for new habitable buildings".

1.33 In providing for the PRLW area greater setbacks will be enabled to the GRUZ.

1.34 In order to appropriately contextualise the PRLW area for the purposes of this submission, physical, natural and built environmental aspects of the land have been extrapolated from environmental investigations taken from abutting land within the Putaruru Growth Cell 1 area.

1.35 Land immediately to the east of PRLW has been subject to residential land development which has been designed in detail to align with the current General Residential land use zone provisions and infrastructure provision of the Putaruru Growth Cell 1 area (allotments have been consented, along with sections of roading corridors and drainage reserve protecting the areas central gully network).

1.36 As required during the Growth Cell 1 subdivision process to date – environmental assessments have been undertaken which are reflective of the wider PRLW area. Such investigations have revealed that the land holds low risk in accommodating further residential land use at the scale proposed to be rezoned through this PRLW submission.

Geotechnical Investigations

1.37 The Submitter previously engaged geotechnical investigations of land abutting the PRLW area by BTW Consultants which was used to advise higher density residential land use within the Putaruru Growth Cell 1 area[3]. Whilst this reporting was focused within the growth cell envelope, it does provide a useful context to the PRLW area.

1.38 In regard to soils, the BTW report indicates that the site is underlain by Whakamaru Ignimbrite and effectively forms the basement of the site and surrounding area.

[3] *BTW Company: Geotechnical Suitability Report: Growth Cell One, Proposed Stages One and Two, Overdale Road Putaruru (Rev A 26/05/2021)*

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Figure 2.1: Study area published geology (source: GNS Science New Zealand Geological Map, 1:250,000)

Image 7: Excerpt from BTW Geotechnical Suitability report for Growth Cell 1

1.39 The Growth Cell geotechnical reporting also notes that the PRLW area more than likely contains air fall tephra in the underlying soil profile.

1.40 As stated by BTW:

> *"The air fall tephra comprises of stiff to very stiff, clayey Silt with varying degrees of clay and fine sand. The plasticity of the soils encountered are generally low. Groundwater is not expected in this unit however; it may be locally perched after periods of intense rainfall."*

1.41 Geotechnical investigations for the area indicate that the elevated and relatively free draining nature of the site over the impervious ignimbrite layer means that any elevated areas are unlikely to hold significant volumes of groundwater and that drainage is relatively unrestricted.

1.42 In discussing the soil properties within the growth cell area the BTW report explicitly records that the area's soils are not sensitive to disturbance, and furthermore that soils within the growth cell are more than suitable for the construction of buildings, roads and associated infrastructure.

1.43 In regard to hazard risks, the geotechnical reporting stated that for a 1 in 25, 500 & 1,000-year event that *liquefaction damage* to the site is considered to be *low to nil*.

1.44 Upon extrapolating such assessments to the abutting land within the PRLW area, geotechnical and associated hazard risks will not present a barrier to rural living land use activities.

Flooding

1.45 The PRLW area contains only a small area of land potentially at risk from flooding. As taken from Councils 1:100 Flood Hazard Mapping (SWDC Public Domaine Maps):

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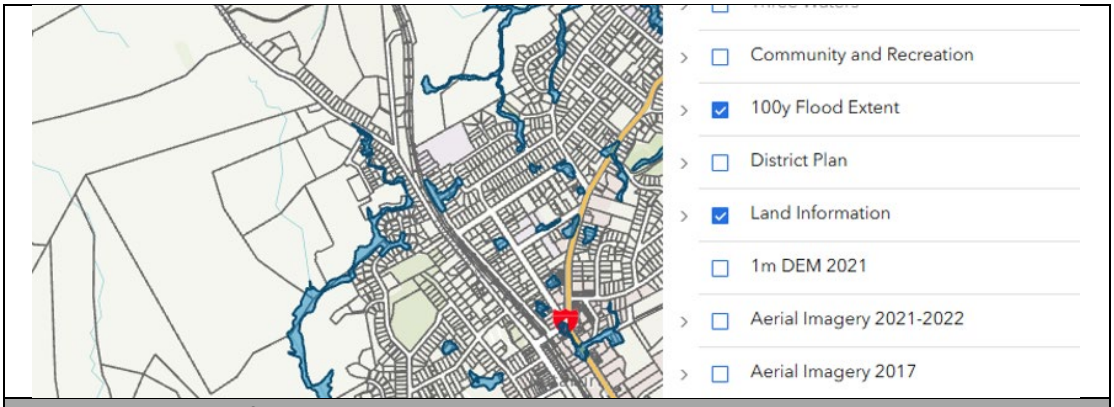

Image 8: Excerpt of SWDC Flood Hazard Mapping

1.46 The small pocket of 1:100 year flooding will not present a significant constraint for future rural lifestyle opportunities within the defined PRLW area.

Heritage

1.47 No areas of mapped Heritage sites or significance have been identified within or in close proximity to the PRLW area.

Infrastructure

1.48 The attached Concept Development Plan – or CDP - (***Attachment A***) indicates the location of a sub transmission powerline crossing the PRLW area from north to south.

1.49 This section of line is a PowerCo asset and therefore any future development within the area will need to be designed to accommodate the applicable safety buffers as required under the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations – which now cover non-National Grid assets.

1.50 Access to the PowerCo asset will also have to be maintained for any future subdivision of land within the PRL area.

1.51 No further infrastructure has been identified within or in close proximity to the PRLW area; however, as presented in the attached CDP, roading and reserve linkages have been provided for to ensure appropriate future proofing is considered as residential development within the growth cell moves to the west.

Contaminated land

1.52 The land contained within the Putaruru Growth Cell 1 abutting the PRLW area is currently transitioning from an operational farm holding to that of residential land use (from the east) - however, land within the PRLW area is still in undisturbed agricultural land use.

1.53 In considering contaminated land matters within the Growth Cell 1 area, the Submitter engaged BTW who in-turn prepared a PSI[4] (note: this PSI covered land within the PRLW area).

1.54 The PSI notes that contamination within the underlying Growth Cell 1 and PRLW area exists and is typical to that associated with dairy farms (i.e., fertilised, chemical storage

[4] *BTW: Environmental Report: Preliminary Site Investigation (PSI) Report – 5 Overdale Road, Putaruru*

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etc.). The PSI also isolated the contamination risk area to that of a 'Central Cluster' area which was contained within land in the Growth Cell area. No notable contamination risks were identified in the PSI as being in the PRLW area.

1.55 As stated in the PSI:

> *"The central cluster, referred to as the 'central hub', where key farming operational sites are located (i.e., milking shed, winter feeding shed, fertiliser storage pit, silage / feed storage, shed, agrichemical storage, effluent pond, stock yard, residential housing) is composed of several potential pieces of land. Specifically, potential ACM building materials and use of lead-based paints, wastewater treatment, bulk fertiliser storage, agrichemical storage."*

1.56 Therefore, cadmium in the soil (excluding the 'central hub' piece of land) is highly unlikely to present a risk to human health with the proposed development.

1.57 Since undertaking the PSI, the central hub area has obtained land use consent under the NESCS through a DSI and subsequent approved Remediation Action Plan (RAP).

1.58 In conclusion, the development of Growth Cell 1, excluding the 'central hub' area marked as a piece of land, is a permitted activity under the NESCS

Concept Development Plan

1.59 Through the PC4 review process the Submitter has interest in an area of land that is suitable for further rural lifestyle development on the western outskirts of Putaruru.

1.60 In consideration of the land's potential, a conceptual development plan has been prepared by the Submitter to support their sought decision from Council.

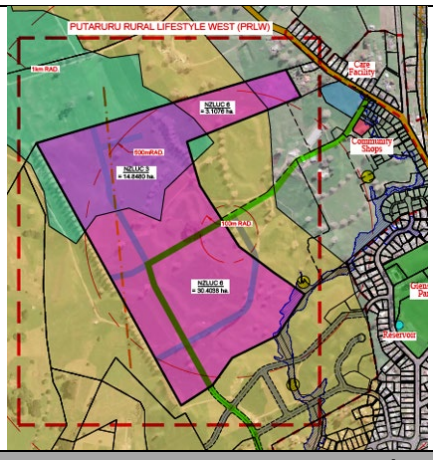

Image 9: Proposed PRLW – Conceptual Development Plan (without prejudice).

1.61 A larger version of the concept plan is contained in ***Attachment A*** of this submission.

1.62 Key points to note in the CDP are that the PRLW area provides a strategic link (with existing and proposed RLZ land) in buffering the western extent of Putaruru's residential expansion areas.

1.63 Infrastructure connections are indicated on the CDP as they relate to a possible roading hierarchy. As well as consideration of the PRLW area's gully networks (for the purposes of reserve (drainage) areas).

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1.64 Soil classes have been shown on the attached plan, whereby the areas lower class 6 soil dominate the area within the PRLW area.

1.65 The provision of larger RLZ allotments to the north of the area will assist in lessening the effects on productive land and integration with the abutting rural land further to the north and east.

National Guidance

National Policy Statement for Highly Productive land

1.66 In addressing matters of national direction in the PC4 s32 report, the National Policy Statement for Highly Productive Land (NPS-HPL) was addressed. In particular, the current proposed extent of RLZ amendments in Putaruru are discussed, whereby it is stated:

Putāruru - rezone to rural lifestyle zone from Alexander Cres to Walsall Rise	Not LUC 1, 2 or 3.	Proposed re-zoning to rural lifestyle. The NPS-HPL is not relevant due to the land not being LUC 1, 2 or 3.

1.67 As indicated on the ***Attachment A*** CDP the PRLW area is dominated by Class 6 soils[5], and therefore will not be contrary to the NPS-HPL.

1.68 Matters relating to the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 have been discussed above.

1.69 The PSI underlying the Putaruru Growth Cell 1 similarly covered land within the PRLW area, to which no significant human health risks were identified.

PRLW Objective and Policy Assessment

1.70 This submission has discussed the scope, intent and philosophy behind the PRLW area, however, from a district plan perspective an objective and policy assessment has been undertaken and has been provided as ***Attachment B*** to this submission.

1.71 As contained in the attached assessment, the proposed PRLW area is not considered to be contrary to the applicable Objectives and Policies of the Operative district plan.

Submission Summary & Conclusion

1.72 The Submitter owns land that is located to the west of Putaruru's Growth Cell 1 GRZ and seeks to rezone approximately 50ha of this land from General Rural Zone to Rural Lifestyle Zone under the current Plan Change 4 process.

1.73 The land subject to this submission is referred throughout as the Putaruru Rural Lifestyle West area (PRLW).

[5] nz6e-3

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1.74 The Submitter has considered the established 'Clearwater test' and considers that the scope and intent of this submission is '*on*' the plan change currently out for public consultation.

1.75 The Submitter agrees in principle with the PC4 intent in regard to meeting future growth needs of local communities – however, it is considered that the current distribution of rural lifestyle land in Putaruru has not been subject to a robust consideration in regard to the mitigation potential such zoning will provide when considering reverse sensitivity for such growth.

1.76 From an environmental perspective the PRLW area has leveraged investigations undertaken by the Submitter on abutting land (in and surrounding the Putaruru Growth Cell 1 area) whereby geotechnical, natural hazard and contaminated land matters have been addressed in support of the sought rezoning. No notable constraints in this environmental regard were identified.

1.77 A Concept Development Plan for the PRLW area has been provided in support of this submission; again, no significant hazard or infrastructure provision constraints have been identified which would prevent or significantly hinder further investigation for the rezoning as sought.

1.78 An objective and policy planning assessment under the current district plan provisions has been provided in this submission. The rezoning of the PRLW area is considered not to be contrary to the current high-level planning provisions for the district.

1.79 Also attached to this submission is a more focused set of submission points (being a tabulated submission table) and sought decisions on PC4 which are complimentary to the substantive rezoning of the PRLW area.

1.80 In consideration of high-level requirements for successful urban growth in Putaruru, the Submitter wishes Council to integrate the area identified as the PRLW area into the Operative South Waikato District Plan under the PC4 process currently underway. Upon integrating the proposed area into the next iteration of the Waikato District Plan, a more effective response to future proofing urban growth will be provided.

The Submitter wishes to present evidence at the Council planning hearing for the PWDP

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Attachment A: PRLW Conceptual Development Plan

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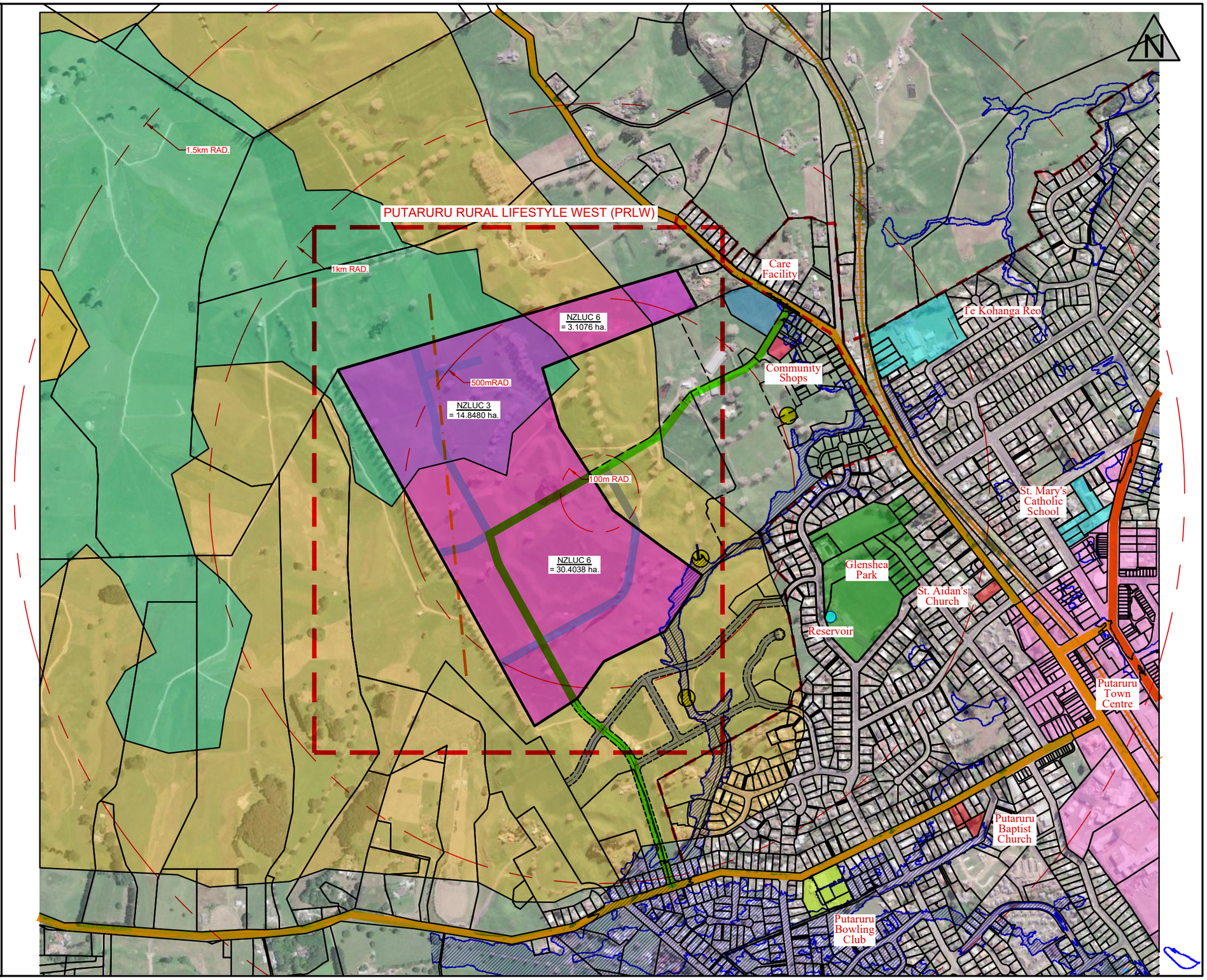
KEY

- Subject Lot
- Town Boundary
- S. H. 1
- Arterial
- Collector
- Local
- Railway
- Overhead Power
- Stormwater Manag.
- Water Reservoir
- 1:100yr Flood Level
- Church
- Bowling Club
- Care Facility
- Communioty
- Education
- Reserve
- Town Centre
- NZLUC 3 (Soils)
- NZLUC 6 (Soils)



Notes

1)	All boundary dimensions and areas are subject to final survey and approval from South Waikato District Council	
2)	Legal Description:	Lot 700 DP 604309 Area: 49.8358 ha. RT. 1183759
3)	Zone:	Rural
4)	Total area:	49.8358 ha.

Size	A3	Scale	1:5000	Date	AUGUST 2026		
No.	Amendment	Init.	Date	Designed	WAB	08/26	
A	PRLW Scheme Concept - Rev #A	WAB	24/08/26	Drawn	WAB	24/08/26	
B	----	----	----	Checked			
C	----	----	----	Approved			

PUTARURU RURAL LIFESTYLE WEST (PRLW)

GREATER PUTARURU STRUCTURE PLAN

OVERDALE ROAD - PUTARURU

Prepared for: SOUTH WAIKATO DEVELOPMENTS LTD.

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Attachment B: PWDP Objective & Policy Assessment

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Attachment B - South Waikato District Plan: Objective and Policy Assessment

Objective	Policy	Comment
Rural Lifestyle Zone		
RLZ-O1 *To maintain the productive capabilities of the rural land resource for primary production activities.*		The PRLW area is predominately contained within Class 6 Soils as identified under the Landcare Research land Use capability mapping tool https://ourenvironment.scinfo.org.nz/maps-and The northern section of the PRLW area contains soils identified as LUC Class 3 soils (being arable. Moderate limitations). The rezoning of the land to RLZ will not fragment the Class 3 soils as only a 14ha edge of such soil will be located within the area. The rezoning of the land to RLZ will not prevent further productive use of the soil resource
	RLZ-P1 *Avoid development and land management practices that result in adverse environmental effects from natural hazards such as erosion, flooding, subsidence or landslip.*	The land within the PRLW area has been considered against the hazard assessments undertaken for land within the Putaruru Growth Cell 1 area. The proximity of the growth cell land to the PRLW area makes such consideration appropriate. The land is considered to represent a low risk to life and property from a natural hazard perspective. Soil conditions have been identified as generally suitable for development (building foundations and infrastructure provision).
	RLZ-P3 *Provide for the subdivision, use, and development of land for rural lifestyle activities in specifically zoned places.*	The PRLW area has been proposed as a specifically defined area due to the location of the Putaruru Growth Cell 1. The PRLW area has been proposed to assist in providing reverse sensitivity mitigation for the large growth cell area and presents a natural continuation of the RLZ currently presented under PC4. As currently presented, a 'belt' of RLZ land is contained along the western boundary of Putaruru's residential zones. The proposed PRLW area provides a logical link in this RLZ belt.
	RLZ-P4	The PRLW area is located between the rural zone to the north and west, and the residential zone of the Putaruru Growth Cell to the east.

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Objective	Policy	Comment
	To minimise the potential for adverse effects of rural lifestyle subdivision, use, and development at the interface of the RLZ with other zones.	It is considered that applying the PRLW zone as sought will create an effective and contiguous buffer between the sensitive land uses of the residential zone with that of the rural zone. The most notable effect mitigation will be for reverse sensitivity and the spatial effects that can be provided for such as greater dwelling setbacks and effective screening.
Subdivision		
SUB-O1 *To minimise the potential for adverse effects in connection with subdivision of contaminated and potentially contaminated land, so as to avoid or mitigate the risk of adverse effects on human health and the environment.*		The land contained within and abutting the PRLW area has been subject to contaminated land assessments pursuant to the NPSCS. Land contained within the PRLW area has a low public health risk from contaminated land matters, therefore the sought RLZ extension will not be contrary to the objective in the event of future subdivision.
SUB-O2 *To ensure that staged subdivision or and development in the Future Urban Zone and Putaruru District Growth Cells (as defined on the planning maps) is appropriately staged to avoid compromiseing the future urban land use pattern of those areas.*		The location and timing of development within the PRLW area will be effectively stages so as to coincide with development within the Putaruru Growth Cell 1 area. The land contained within the growth cell and the PRLW area is controlled by the Submitter therefore development within the prosed RLZ will not take place prior to the residential land use as currently provided for. Access (transportation) infrastructure as well as the applicable three waters infrastructure required by the PRLW area is contingent on the advanced planning and development within the growth cell; consequently, the proposed PRLW area will not advance rural lifestyle land use that is out of sequence to the abutting residential land use to the east of the land. No land use within the growth cell 1 area will be compromised by the rezoning of the PRLW area.

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SUB-O3 *To ensure safe and efficient subdivision, well-integrated with the functions of different roads, and which is designed to provide for appropriate alternative transport modes (particularly walking and cycling).*		The Submitter has prepared a concept development plan which contains indicative transportation corridors which could service the PRLW area through the Putaruru Growth Cell 1 residential zone (see ***Attachment A***). The indicative transportation networks are considered to be well-integrated with surrounding land use, not only with the abutting residential area, but also with the wider Putaruru transportation network. The PRLW area will benefit the wider Putaruru community through the provision of access links to the rural environment for alternative modes of transport, such as cycling.
	SUB-P7 *Provide for the subdivision of land for rural lifestyle activities in specifically zoned locations.*	The substantive purpose of this submission is to enable the steady and progressive establishment of rural lifestyle land use as an effective future-proofed residential buffer to the west of Putaruru's residential zone. The successful outcome of this submission will see the subdivision of land at a density reflective of rural lifestyle development across the district. The concept design plan presents a potential layout for future rural lifestyle development within the PRLW area.
	SUB-P8 *To minimise the potential for adverse effects of rural lifestyle subdivision, at the interface of the GRUZ and RLZ with other zones.*	Adverse effects have been discussed in this submission, primarily as they relate to reverse sensitivity effects. The location of Putaruru's current and proposed RLZ is presented on the PC4 planning map. This map shows the use of the RLZ as a buffer between higher impact rural land use effects (i.e., noise, odor etc.) with that of the more sensitive residential zone land uses. The proposed PRLW area presents as a link between Putrauru's RLZ along the western residential extent of the township and consequently will further assist in the effective mitigation of reverse sensitivity effects between the rural zone and the residential zone of the township. Adverse effects of the RLZ are similar in nature to that of the residential zone; however, the key point of difference is that the RLZ can accommodate spatial distancing as effective mitigation for both rural and residential land use.

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		Such spatial buffering relates to greater building setbacks, as well as the ability to introduce more effective screening to the higher impact rural land uses.
Natural Hazards		
NH-O1 *To safeguard people, properties and the environment from the adverse effects of natural hazards*	***NH-P2*** *Ensure that development minimises risks to people, properties and the environment from natural hazards.* ***NH-P3*** *Avoid development and land management practices that result in adverse environmental effects from natural hazards such as erosion, flooding, subsidence or landslip.*	A high-level discussion has been provided in this submission regarding natural hazards associated with the PRLW area. This discussion has been based on environmental (geotechnical) assessments for land immediately abutting the PRLW area – being land currently being developed for residential land use within the Putaruru Growth Cell 1 area. As discussed, geotechnical information notes that the soil resource contained within the wider area presents suitable opportunities for building platforms and infrastructure provision (i.e., the soil profile contains stiff to very stiff clayey silt along with fine sand). Such soils do not lend themselves to excessive erosion of stability issues. Geotechnical reporting for the area was to the effect that the underlying soils were *not* sensitive to disturbance. Further to the above, natural hazard assessment from the site indicated that in a 1 in 25, 500 and 1,000-year event that liquidation damage to the area was considered to be low to nil. Flood hazard has also been discussed in the substantive submission document, whereby negligible flood levels in the 1:100 year event. In consideration of geotechnical investigations on land immediately abutting the PRLW area, the sought zone change will not be contrary to the applicable natural hazard objective and policies.
	NH-P5 (PC4) *On land that is potentially prone to liquefaction, before new subdivision or development occurs, require an assessment by a geo-professional that reflects the type and scale of the activity, its overall vulnerability to the effects of liquefaction and the*	As indicated above, the land within the PRLW area is not considered to be prone to significant liquefaction. The proposed rezoning will not be contrary to the new NH-P5 policy that has been introduced into the District Plan via PC4.

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	appropriate mitigation measures needed to reduce risk to an acceptable level.	
Contaminated Land		
CL-O1 *To minimise the potential for adverse effects in connection with the use and development of contaminated and potentially contaminated land, so as to avoid or mitigate the risk of adverse effects on human health and the environment.*	***CL-P1*** *To ensure that contaminated land is managed or remediated to ensure that contaminants are at a level acceptable for the proposed land-use.*	The land containing both the Putaruru Grow Cell 1 and PRLW areas was and is still in use as an operational dairy farm. As residential land use within the growth cell moves further to the west, the current farming operations will scale back accordingly. As a component of the residential change in land use in the growth cell, a contaminated land assessment was undertaken in accordance with the NESCS. This undertaking required the landowner to obtain land use consent in consideration of past land use within the farming operation that could potentially have an adverse effect on human health. The land contained within the PRLW area was similarly captured under the growth cell contaminated land assessment, whereby only low-level risks to human health were identified (i.e., fertilizer storage areas were not contained within the PRLW area but rather were located in the residential growth cell to the east. In consideration of the areas contaminated land considerations, possible RLZ development within the PRLW area will not be significantly contrary to the applicable objective and policy set of the district plan.

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Attachment C: PC4 Submission Table

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Attachment C - South Waikato District Plan: PC4 Individual Submission points

No.	Proposed PC4 Provision	Submission	Comment: Decision Requested and Reasons
3 -Interpretation			
1	***Duplex Units*** *means a residential building comprising two attached residential units on one allotment, or two Records of Title where subsequently subdivided. For the avoidance of doubt, residential units physically connected by garage(s), will also be deemed to be attached.*	The Submitter supports the defined term for Duplex Units. Reference in the definition to being connected by garages is also supported by the Submitter	**Support** The Submitter seeks that the definition for '*Duplex Units'* be retained unaltered.
11-SUB Subdivision			
2	***Policy SUB-P19*** *Subdivision of sites adjacent to a District Growth Cell or a Future Urban Zone must: (a) as appropriate, provide a roading pattern which offers good connectivity to the adjacent to District Growth Cell or Future Urban Zone; and (b) not compromise the provision of infrastructure and services or the function of the adjacent District Growth Cell or Future Urban Zone.*	The Submitter agrees in principle that development (subdivision or other) adjacent to a District Growth Cell should be designed so as to ensure infrastructure integration. Notwithstanding the above, the Submitter does not agree with the use of the word "*must*" in qualifying the policy intent. The Submitter contends that there can be times whereby development within the District Growth Cell will not require integration (i.e., in the event development land is only partially located in designated Growth Cell land or there is no functional need for infrastructure integration with the subdivision (i.e., future development block). Including such a rigid word in the policy runs the risk of the policy being over-applied by users of the district plan.	**Support in part.** The submitter supports the purpose and intent of Policy SUB-P19; however, the use of the word '*must*' should not apply in all situations for land subdivision in a District Growth Cell. The Submitter seeks that the word "*must*" be replaced by the word 'should' in Proposed Policy SUB-P19.

No.	Proposed PC4 Provision	Submission	Comment: Decision Requested and Reasons
3	***SUB-P20*** *Subdivision in a District Growth Cell must not occur unless a Development Concept Plan for the comprehensive and integrated development of the cell or zone has been approved by South Waikato District Council and approved by way of a resource consent.*	The Submitter agrees in principle that development (subdivision or other) within a District Growth Cell should be designed so as to ensure the development is integrated. The submitter does not agree with the use of the word "must". The use of such a definite or rigid word in instances whereby any development (large or small) is required to prepare a Development Concept Plan (DCP) can be considered too onerous – particularly where only a minor development is being prosed, or only a small part of the development or subdivision (i.e., boundary adjustment) is contained within one of the district's growth cells. So as to ensure the policy setting reflects development scale, the submitter seeks that *either*: 1. The word "*must*" is replaced with the word 'should', ***or*** 2. The words 'an appropriate' are included. *"Subdivision in a District Growth Cell ~~must~~ should not occur unless ~~a~~ an appropriate Development Concept Plan for the comprehensive and integrated development of the cell or zone has been approved by South Waikato District Council and approved by way of a resource consent."*	The Submitter **supports in -part** Proposed *Policy SUB-P20* The submitter seeks that Proposed Policy SUB-P20 is amended to the extent that: The word "*must*" is replaced with the word 'should', or The words '*an appropriate'* are included.

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4	***SUB-INFO-R2*** ~~*Putaruru*~~ *District Growth Cells* *(a) In addition to any relevant matters listed in SUB-INFO-R1 above, a Development Concept Plan (DCP) shall be submitted with all subdivisions for a subject site that is wholly or partly within a Putaruru Urban District Growth Cell*	The Submitter supports the removal of the township name when referring to growth cells. The existing growth cells within Putaruru are well recognised, with design and development within Growth Cell 1 being well advanced. The township name attached to the Putaruru Growth Cells are considered irrelevant in consideration of the newly zoned land under PC4.	**Support** SUB-INFO-R2 The Submitter supports removal of the township name prefix to the district's growth cells
5	***SUB-R2 RDIS Activities*** ~~*(3) Any subdivision in a GRZ creating one or more allotments of between 300m2 and 450m2 (net site area)*~~	The Submitter has had significant involvement in residential design and development within the South Waikato District. Such involvement has meant that a firm understanding of market conditions is held by the Submitter, and furthermore, that they hold a firm understanding of housing demand within the district's newly developing residential growth areas. Based on this knowledge, the Submitter supports density choice being introduced into the district plan under PC4. The submitter supports a 300m^2 minimum allotment size in the GRZ as provided for under SUB R5(1) - GRZ and MU-SETZ	**Support** The Submitter supports the removal of clause (3) from Rule SUB-R2 RDIS as well as the associated matters of discretion.
6	***SUB R5(1) - GRZ and MU-SETZ*** *(a) Minimum Size and Shape*	The Submitter supports the proposed minimum lot size being reduced to 300m^2 in the GRZ. There are clear examples in the district as well as in other jurisdictions that otherwise compliant	**Suppor**t R5-Standards SUB R5(1) - GRZ and MU-SETZ to the extent that a 300m^2 minimum allotment size is provided. *Retain* R5-Standards SUB R5(1)(a)(i)

No.	Proposed PC4 Provision	Submission	Comment: Decision Requested and Reasons
	(i) Minimum lot size (net site area) shall be ~~450~~300m² in the GRZ and 450m² in the MU-SETZ. The maximum lot size net site area shall be 2000m2.	housing (other than this rule) that achieve the desired outcome can be achieved on lot sizes much smaller that 450m² in the GRZ The Submitter does not support a new maximum allotment size of 2000m² being introduced. The 300m² minimum lot size is supported for the reasons provided above in submission point 6. The Submitter opposes having a 2,000m² standard for maximum lot sizes as this will unfairly target staged development within large greenfield Growth Cells whereby flexibility is required for future development lots (i.e., pending market demand).	**Oppose** R5-Standards SUB R5(1) - GRZ and MU-SETZ in regard to a maximum 2,000m² being applied. *Delete* R5-Standards SUB R5(1) relating to a maximum 2,000m² lot size
7	***SUB R5(1) - GRZ and MU-SETZ*** *(b) Average Area* *For subdivision creating more than one additional site, the average site area of all new sites created shall be greater than or equal to 450m2 in the GRZ and 600m2 in the MU-SETZ. Where a subdivision of a block of land is staged, the overall average area of all sites created shall not be less than 450m2 in the GRZ and 600m2 in the MU-SETZ, and the subdivider shall provide an overall subdivision plan indicating the full extent of proposed future subdivision.*	The Submitter supports the proposed average lot size *being reduced* to 450m² in the GRZ; however, the Submitter considers that having an average lot size at all is an unreasonable concept given that a minimum lot size in the GRZ can be as low as 300m². Requiring an average lot size as a subdivision performance standard is considered unreasonable with the reasons for requiring an average lot size being uncertain. Clarification in the district plan from Council in this regard would be welcome (i.e., an explanatory note)	**Support in part** *SUB R5(1)(b)* for the *average lot size reduction* from 600m² to 450m² in the GRZ. Notwithstanding this support - the Submitter questions *why* an average lot size is required at all as there is no explicit reasoning for this. The minimum allotment size of 300m² can easily accommodate a compliant residential dwelling with suitable on-site amenity. Therefore, without and explanation it is uncertain then as to why an average lot size standard is required. The Submitter seeks that an average lot size requirement is removed from the GRZ

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			altogether – alternatively an explanation note reasoning the purpose of the average lot size should be included.
8	***SUB R5(1) - GRZ and MU-SETZ*** *(f) Limitations of Putaruru Growth Cell 1 (Overdale Road)* *No subdivision within Putaruru Growth Cell 1 shown on the Planning Maps shall result in the cumulative number of residential unit sites within that Growth Cell exceeding ~~328~~ 428 Household Unit Equivalents (HUEs). This calculation shall include any multi-unit developments already approved by Council*	The Submitter agrees in principle with the increase in allowable HUEs in the Putaruru Growth Cell 1 area. However, the Submitter considers that residential development restrictions contained elsewhere in the district plan provisions adequately regulate yield within the zone – having an explicit limit stated is 'reverse engineered' and hence is not supported.	**Oppose** any nominal limitation on Growth Cells, particularly Putaruru Growth Cell 1 (Overdale Road). There are enough provisions elsewhere in the DP (incl. PC4 changes) regulating the rate of growth and capacity of growth cells to the provisions of appropriate infrastructure. The Submitter seeks that R5-Standards SUB R5(1)(f) be *deleted*.
13-GRZ General Residential Zone			
9	***GRZ-P4*** *Where the amenity values of adjoining properties are not compromised, provide for duplexes, terrace housing and apartments to be developed, particularly in those areas most accessible to jobs, services, community facilities and open space.*	The Submitter considers that the general term "amenity" as applied under Proposed Policy GRZ-P4 is vague and too open to subjective interpretation by district plan regulators. Whilst the Submitter supports Proposed Policy GRZ-P4 in principle, it is considered necessary to remove the superfluous wording … *"Where the amenity values of adjoining properties are not compromised*".	**Support in Part** The Submitter seeks that the subjective statement "*Where the amenity values of adjoining properties are not compromised*" be removed from Proposed Policy GRZ-P4.
10	***GRZ-P6*** *Ensure residential sites adjacent to public space achieve visual and physical connectivity to these areas.*	The Submitter agrees that visual connection to public open space is desirable; however, in instances of higher density development (i.e., apartments, duplexes etc..) such a connection may not be readily achieved.	**Support in Part** The Submitter seeks that the suggested wording '*when possible'* is incorporated in

No.	Proposed PC4 Provision	Submission	Comment: Decision Requested and Reasons
		In consideration of the above the Submitter requests the policy be reworded as follows: *"Ensure when possible residential sites adjacent to public space achieve visual and physical connectivity to these areas."* Or words to similar effect.	to Proposed Policy GRZ-P6 as provided– or wording to similar effect.
11	***GRZ-R1 PER Activities*** *(1) Residential units (maximum 2 per property) on sites with a net site area (per residential unit) of 450m² or more.*	The Submitter agrees in principle that each property should be able to contain two residential units as a permitted activity; however, to align this activity with the PC4 density standards, a minimum lot size of 300m^2 should be used as opposed to 450m^2 as currently indicated. The Submitter acknowledges proposed Rule GRZ-R2(2) RDIS Activities (allowing a 300m^2 area per unit); however, it is considered that a permitted activity status for such density should be available to developers.	**Support in part** GRZ-R1(1) PER Activities. The Submitter seeks that the permitted activity rule is amended so that each residential unit need only a 300m^2 net site area as opposed to 450m^2. Such an amendment allows for future subdivision under the subdivision design standards.
12	***GRZ-R3 DIS Activities*** ... *(13) Retirement Villages*	The Submitter considers that a retirement village is common land use in the residential zone and therefore should *not* carry a starting point as a Discretionary Activity under the district plan. The effects of retirement villages are similar to that of higher-density residential land use (i.e., noise sensitivity, on-site amenity etc..) and therefore should be afforded a more permissive Restricted Discretionary activity status.	**Oppose** Rule GRZ-R3(13) Discretionary Activities as it applies to retirement villages. The GRZ is the most appropriate zone for such community facilities, and the activity status should reflect this – consequently a *Restricted Discretionary* activity status is sought by the Submitter.

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13	***GRZ R5(1) Building Setbacks*** *(a)* *Buildings must be setback from the following boundaries: Front* *3 m; or* *5 m for garages to the front boundary or for residential units that do not incorporate a garage.*	The Submitter considers that more certainty is required in the wording of this rule to the extent that the 5m setback *does not* need to apply to the whole frontage – I.e., only applies to the garage dimension (or width of).	**Support in part.** The submitter submits that GRZ R5(1)(a) is made explicitly clear that the standard only applies to the width of the garage in limiting the 5m setback. The Submitters offers the following wording amendments: *5m for residential units that do not incorporate a garage for a minimum width of 5 m along the front boundary from one side boundary.*
14	***GRZ R5(1) Building Setbacks*** *…* *(c) Rear site* *1.5 m or 5 m for garages from the edge of a private way/right of way.*	The submitter holds significant and practicable knowledge in residential design in the districts residential zones and seeks that the criteria in R5(1)(c) is clarified. The Submitter considers that the 5m setback need only apply for a private ROW when the access 'fronts' or faces the transportation corridor. When this is not the case a 1.5m setback should be enabled.	**Support in part.** The Submitter supports in part Proposed R5(1)(c) to the extent that clarification is provided to confirm the 5m setback only applies when the *garage door* fronts the private way/right of way. The Submitter seeks the following amendment to R5(1)(c): *1.5 m or 5 m for garages from the edge of a private way/right of way where the garage door fronts the private way/right of way.*
15	***GRZ R5(2)*** *…* *(a) Outdoor Living Space*	The Submitter agrees with this amendment.	**Support** The Submitter supports GRZ R5(2)(a) Retain wording as notified

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	Each residential unit shall have an outdoor living space with a minimum of 50m² in area, that is directly accessible from the residential unit, ~~at least 50% of the area is to the north of the building~~ located to the north, east or west of the residential unit, with the minimum dimension being 2.5 metres, and with one part of the area capable of containing a rectangle of 4 metres by 6 metres.		
16	***GRZ R5(2)*** … *(c) For duplex units and terraced housing, each unit shall have an exclusive outdoor living space of 20m² which contains no dimension less than 4m, or a 9m² balcony with a minimum dimension of no less than 1.8m. This shall be unobstructed by vehicle access, parking spaces, and buildings and shall be directly accessible from the main living area*	The Submitter agrees with this new standard.	**Support** The Submitter supports GRZ R5(2)c) The Submitter seeks the retention of the wording as notified
17	***GRZ R5(3)*** *(a) The maximum building coverage is 55% of the net site area.* *(b) The minimum permeable surface area shall be 20% of the net site area.*	The Submitter agrees with the new standards (a) and (b) as they reflect appropriate development criteria.	**Support** The Submitter supports GRZ R5(3)(a)&(b) The Submitter seeks the retention of the wording as notified.
18	***GRZ R5(4)*** *(a) Maximum Building Height - ~~8 metres~~ 11 m.*	The Submitter agrees with this amendment.	**Support** The Submitter supports GRZ R5(4)(a) The Submitter seeks the retention of the wording as notified.

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No.	Proposed PC4 Provision	Submission	Comment: Decision Requested and Reasons
19	***R5(5) Duplex Units and Terraced Housing*** *(a) Must be located on a front site* *(b) The average net site area must be at least 150m² per residential unit* *(c) Building coverage must not exceed 60%* *(d) No exterior wall may exceed 15m in length without being horizontally or vertically stepped or containing a change in materials* *(e) Each unit shall have an exclusive screened service area of 10m²* *(f) Windows shall be located and designed (including by glazing) to avoid views between rooms on separate sites.*	In response to notified rule *R5(5)(a)* the submitter does not agree that a duplex unit *cannot* be located on a rear site. There is no reason(s) provided why a duplex development needs to be on a front site; however, should the reason relate to manoeuvrability concerns, then revised wording can be applied to the extent that *"(a) Must be located on a front site unless on-site manoeuvring is provided".* In addition to the above, the Submitter does not agree with *R5(5)(f)* as it is non-specific on in a contextual sense, and there are no other such restriction on other medium density housing in the district – only for duplexes. In consideration of the effect of *R5(5)(f),* the Submitter considers that the following qualifier should be provided: (note that clause f only applies to the opposing duplex unit and where windows are within 1.5m of the common lot boundary). In addition - the Submitter considers that clause (e) of Rule R5(5) is too onerous and utilises too much precious space. A more appropriate area for an outdoor living court is 5m². The Submitter considers that a 10m² service court is too large an area whereby such utility use areas can be lessened to 5m².	**Oppose** Rule R5(5) clauses (a) (e) (f). **Support** Rule R5(5) clauses (b) (c) (d). The Submitter does not support the wording of (a) and seeks the following text is included: *"(a) Must be located on a front site unless on-site manoeuvring is provided".* The Submitter does not agree with the 10m area requirement under Rule R5(5)(e). Rather, it is considered that a 5m² area is adequate and commonly applied elsewhere in the Waikato. To ensure functionality is retained the Submitter suggests including the words "*with at least one dimension of 2.5m*" should be applied. R5(5)(e) should read: *(e) Each unit shall have an exclusive screened service area of ~~10~~5m² with at least one dimension of 2.5m* The Submitter does not agree with the wording used for Rule R5(5)(f). It is reasonably considered that there are no other such glazing restrictions on other residential housing units across the district. The Submitter suggests that provision Rule R5(5)(f) be qualified to reflect that it only applies to the opposing

No.	Proposed PC4 Provision	Submission	Comment: Decision Requested and Reasons
			duplex unit and when windows are within 1.5m of the common lot boundary.
20	***GRZ-R6 ~~PREC1~~ Growth Cell Standards*** *R6(1) Limitations of Putaruru Growth Cell 1 (Overdale Road).* *(a) No permitted activity within Putaruru Growth Cell 1 shown on the Planning Maps shall cause the cumulative number of residential unit sites within that Growth Cell to exceed 328 428 Household Unit Equivalents. This calculation shall include any multi-unit developments already approved by Council.*	In alignment with the submission point 8 above, the Submitter considers that whilst an increase in HUEs for the Putaruru Growth Cell 1 area is agreeable, the limitation placed on HUE within the growth cell should be removed from the District Plan under PC4.	**Oppose** any limitation on Growth Cells, particularly Putaruru Growth Cell 1 (Overdale Road). There are enough provisions elsewhere in the DP (incl. PC4 changes) that limit the rate of growth and capacity of growth cells to the provisions of appropriate infrastructure. The Submitter seeks that *GRZ-R6 R6(1)* be deleted.
21	***CHAPTER 12.6 LIGHT*** *R3 (f)* *No building shall be constructed and/or left unfinished and/or clad in any protective material or cover which could reflect sufficient light to detract from the amenity values of the neighbourhood or cause discomfort to any person resident in the locality. Material used in the construction or cladding or protection of a building from which discomfort glare is likely to occur should have a reflective value not greater than 20%*	Whilst not directly included within PC4, the submitter has been in discussions with Council planning and development officers who suggested that the current rule intended to lessen the adverse effects of light reflection for glint and glare was not being applied as intended and hence should be amended as appropriate at a future, opportune, plan change opportunity. In consideration of this suggestion the Submitter is hopeful for the PC4 planning committee to amend Rule R3(f) of Chapter 12.6 as a minor addition under the PC4 process. The RRV increase will align with PC4 Policy GRZ P5 regarding a high standard of on-site amenity.	**Neutral** Whilst not directly included under PC4 - as a residential zone rule change the Submitter seeks that Rule R3(f) of Chapter 12.6 be amended so as to increase the current 20% reflectivity measure. The Submitter considers that 20% is very low and severely limits options on cladding colour within the residential zone. A LRV in the range of 40%-55% would be more acceptable. For example "Gull Grey", a common roof cladding colour has an LRV of 51% and would not normally be anticipated to reflect sufficient light to

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			detract from amenity values of the neighbourhood.

The Submitter seeks to be heard in support of the above submission points