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 Developments 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

South Waikato Development Limited: 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.

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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)

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	(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

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		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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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

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			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.	**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