From: "Hannah Osborne-Allen" <Hannaho@nicholsonsurveying.co.nz>
Sent: Wed, 2 Sep 2026 12:25:22 +1200
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Cc: "Leeanne Dunn" <ld@nicholsonsurveying.co.nz>; "Tim Bailey" <tb@nicholsonsurveying.co.nz>
Subject: Nicholson Surveying PC4 Submission
Attachments: Nicholson Surveying - PC4 Submission.pdf

Good afternoon,

Please see attached the PC 4 submission on behalf of Nicholson Surveying.

Kind regards

Hannah Osborne-Allen
Planner
O [redacted]

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

NICHOLSON SURVEYING LIMITED

43 Arapuni St, Putāruru

https://nicholsonsurveying.co.nz/

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2 September 2026

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

SUBMISSION BY NICHOLSON SURVEYING ON PROPOSED PLAN CHANGE 4 TO SOUTH WAIKATO DISTRICT COUNCIL

1.0 SUBMISSION DETAILS

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

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

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

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

2.0 INTRODUCTION AND SUBMITTER'S INTEREST

2.1 The Submitter, Nicholson Surveying Ltd, is a local surveying and land development consultancy based in Putāruru. The Submitter has been operating in the South Waikato District for over 30 years and works with landowners, developers, and the local community on subdivision, resource consent, and land development projects within the district.

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

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3.0 EXECUTIVE SUMMARY / OUTCOMES SOUGHT

3.1 The Submitter supports the strategic intent of PC4, including the rezoning of additional land for urban growth. This submission seeks targeted amendments and clarifications to ensure the planning framework is practical, proportionate and capable of supporting coordinated development within the District. The Submitter also seeks targeted amendments to the Zoning maps to ensure that the zone boundaries are cohesive and provide for coordinated residential growth.

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

- Outcome 1 - retain the identification and proposed rezoning between Alexander Cres and Walsall Rise, as Rural Lifestyle Zone and extend this area to remove the isolated General Rural Zone remnant between the Rural Lifestyle Zone and Growth Cell 5.
- Outcome 2 - retain the identification and proposed rezoning of Putāruru Growth Cell 5 and extend this area to include the current access section off Arapuni Road.
- Outcome 3 - retain the proposed rezoning of Tokoroa Growth Cell 1.
- Outcome 4 - amend the Development Concept Plan provisions.
- Outcome 5 – clarification of the rating impacts of the Future Urban Zoning.
- Outcome 6 - make amendments to specific policies and rules, as outlined in this submission.

4.0 SUBMISSION POINTS BY TOPIC

4.1 Rezoning of Land

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

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

4.1.3 The Submitter seeks that Council review the area of land (Lot 1 DPS 26076 and Lot 1 DPS 89105) that remains zoned General Rural Zone between the proposed Rural Lifestyle Zone and Putāruru Growth Cell 5. This residual General Rural Zone area creates an irregular zoning pattern between two areas identified for future residential and rural lifestyle growth.

4.1.4 The Submitter supports the identification and proposed rezoning of Tokoroa Growth Cell 1.

4.1.5 The Submitter generally supports the identification of land for Future Urban Zoning (FUZ) however the Submitter seeks amendments to the rules to ensure individual landowners' ability to use the land is not unnecessarily burdened whilst it is still effectively General Rural Zone.

4.1.6 The Submitter also seeks clarification on how FUZ land will be rated. The Submitter is concerned that the proposed Future Urban Zone may create a circumstance where landowners experience increased property values, increased rates and holding costs while remaining unable to exercise urban development rights until a future Development Area Plan and rezoning process is completed.

4.1.7 The Submitter also considers that the FUZ provisions should recognise that land remains in an existing rural use until urban development occurs. Landowners should be able to continue reasonable rural use and development of FUZ land, provided

such activities do not compromise future urban development outcomes. This includes practical activities such as farm buildings, worker accommodation, replacement dwellings and minor rural activities where these can be appropriately located and managed.

4.2 Development Concept Plan

4.2.1 The Submitter supports the use of Development Concept Plans (DCPs) as a mechanism for promoting coordinated and integrated development of the District Growth Cells. However, as currently drafted, the DCP requirements in SUB-INFO-R2 are extensive and could impose a significant upfront cost on developers, particularly where subdivision is only sought for an initial stage or part of a growth cell.

4.2.2 The Submitter also seeks that the DCP provisions recognise that urban development and subdivision are commonly undertaken in stages. Requiring a fully detailed DCP at the outset of development may front-load significant cost, technical investigation and design work before there is certainty that later stages will proceed. This could create an unnecessary barrier to development and may discourage or delay the delivery of urban growth capacity anticipated by PC4.

4.2.3 The Submitter considers that the DCP framework should allow for an overall high-level concept/structure plan for the wider growth cell, with more detailed design and technical assessment provided progressively as each stage of subdivision or development is advanced.

4.2.4 The DCP should identify infrastructure corridors, roading connections, reserves and staging at a concept level, rather than requiring detailed engineering design and modelling for the entire growth cell before development can commence.

4.2.5 The South Waikato Growth Plan 2024–2054 (Growth Plan) specifically identifies affordability constraints as a key issue for the District. Objective 2 of the National Policy Statement on Urban Development (NPS-UD) also expressly states that planning decisions should improve housing affordability by supporting competitive land and development markets. The Section 32 report itself acknowledges that

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requiring a DCP before subdivision can occur within a District Growth Cell, may increase upfront planning costs for developers and delay development timelines. In the Submitter's view, this risk should be carefully managed. If the DCP requirements are too detailed, costly or rigid at the outset, they may undermine the very growth and affordability outcomes that PC4 is seeking to achieve.

4.2.6 The Submitter therefore seeks that the DCP provisions are amended to ensure the level of information required is proportionate to the scale and stage of development proposed and does not unnecessarily front-load costs or create delays that could affect housing supply and affordability.

4.3 Specific Amendments to Policies and Rules

4.3.1 The Submitter seeks that the wording of SUB-06 be reconsidered. SUB-06 states that subdivision within the FUZ is to be avoided unless it is for network utilities, minor boundary adjustments, or similar limited purposes. This is restrictive for landowners seeking to undertake early-stage subdivision or enabling works before a plan change or live zoning process is complete.

Subdivision should be able to occur where it does not compromise future urban development, including practical matters such as boundary adjustments or interim servicing arrangements, where these can be appropriately considered through the subdivision process.

4.3.2 The Submitter seeks that the wording of SUB-P2 is reconsidered so that it is clear that subdivision can occur where the site provides safe, flood free, stable building platforms at the time of subdivision, without compromising the Future Urban development potential of the block.

4.3.3 SUB-R3 states subdivision in the FUZ is a discretionary activity where a DCP is submitted and the subdivision complies with the relevant Development Area Plan. This creates uncertainty for developers, even when the proposal is consistent with the desired future urban outcomes. If the purpose of the DCP is to demonstrate that subdivision will not compromise future urban development, then compliance with an accepted DCP and relevant Development Area Plan should provide a more certain

consenting pathway. In our opinion, the activity status under SUB-R3 should be restricted discretionary rather than discretionary.

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

4.3.5 Policy FUZ-P3(i) seeks to prevent more than one dwelling on a site and FUZ-R3 makes more than one residential unit on a site a non-complying activity. The Submitter is concerned that this is unnecessarily restrictive for landowners, and may prevent practical arrangements such as worker accommodation, or family succession planning and interim use of the land pending urban development. The Submitter considers a restricted discretionary pathway would be more appropriate for additional dwellings where future urban development is not compromised.

4.3.6 The Submitter seeks that the building coverage rule (R6(3)) in the Rural Lifestyle Zone is reviewed. Currently the rule applies a blanket 10% building coverage limit to all sites within the Rural Lifestyle Zone. For sites that meet the minimum lot size of 2,500m², this results in a maximum building coverage of 250m². In the Submitter's view, this limit does not adequately reflect or support the intended function of the Rural Lifestyle Zone. The reason this zone exists is to provide people with an opportunity to live in a rural environment, including more space for activities and buildings. This often includes larger accessory buildings, such as sheds, workshops, or storage buildings, which are currently not supported by this rule.

4.3.7 The Submitter considers Council should either increase the permitted building coverage limit or provide a graduated building coverage standard that better reflects the range of allotment sizes in the Rural Lifestyle Zone.

4.4 Infrastructure Servicing and Funding

4.4.1. The Submitter seeks clarification of the infrastructure servicing requirements under INF-P2 and INF-P3, particularly what is required to demonstrate that infrastructure is “secured” before development proceeds.

4.4.2. Submitter considers that the provisions should recognise that infrastructure can be delivered progressively as growth cells are developed. Requiring all infrastructure to be physically available at the outset may unnecessarily constrain staged development where there is an agreed and appropriately secured pathway for infrastructure delivery.

4.4.3. The Submitter therefore seeks that the provisions clarify what may constitute infrastructure being “secured”, including whether physical construction, funding agreements, development agreements or an agreed staged delivery programme may satisfy the requirement, where appropriate. The provisions should also identify any evidence and triggers required to demonstrate that servicing is secured for the relevant stage of development.

4.5 HUE Allocations and Development Capacity

4.5.1. The Submitter supports the use of HUE allocations as a mechanism to manage development capacity and infrastructure demand. However, fixed HUE allocations may unnecessarily constrain development where infrastructure capacity becomes available earlier than anticipated or where allocated capacity remains unused.

4.5.2. The Submitter considers that the HUE framework should provide some flexibility to respond to changes in infrastructure capacity and development circumstances, while continuing to manage the overall capacity of the network.

4.5.3. The Submitter therefore seeks that PC4 include a policy or method enabling HUE allocations to be periodically reviewed where infrastructure capacity changes, including a mechanism to reassess or reallocate unused HUE capacity where appropriate.

4.6 Connectivity

4.6.1. The Submitter supports the principle of providing connectivity to Growth Cells and FUZ land to enable coordinated and efficient development. However, connectivity requirements should recognise that site circumstances, existing development, topography and fragmented ownership may make some connections impractical or unnecessary.

4.6.2. The Submitter therefore seeks that SUB-P19 be amended to provide that connectivity is required where practicable and where it is consistent with the efficient development of the relevant sites. This would retain the objective of integrated development while allowing site-specific circumstances to be considered through the subdivision process.

5.0 CONCLUSIONS

5.1 The submission points relate to the following matters:

a. The Submitter supports the overall intent of PC4 to provide for urban growth within the South Waikato District, including the identification and rezoning of land for future residential and rural lifestyle development.

b. The Submitter seeks targeted amendments to the planning maps to ensure zoning boundaries are practical, cohesive and capable of supporting coordinated development.

c. The Submitter supports the use of Development Concept Plans as a tool for integrated planning but seeks amendments to ensure the DCP provisions are proportionate and capable of being implemented in stages, without unnecessarily front-loading cost, delaying development, or undermining housing supply and affordability outcomes.

d. The Submitter seeks that DCPs establish the key infrastructure corridors, roading connections, reserves and staging at a concept level, with detailed engineering, servicing and subdivision design able to be addressed progressively through subsequent consenting processes.

e. The Submitter seeks clarification of the rating implications of the Future Urban Zone, particularly to ensure landowners are not exposed to increased holding costs while remaining unable to exercise urban development rights.

f. The Submitter seeks that landowners within the FUZ retain the ability to undertake reasonable rural use and development where this does not compromise future urban development outcomes.

g. The Submitter seeks clarification of infrastructure servicing requirements, including what is required to demonstrate that infrastructure is “secured” and how staged infrastructure delivery can be accommodated.

h. The Submitter seeks greater flexibility in the allocation and review of HUE capacity where infrastructure becomes available earlier than anticipated.

i. The Submitter seeks amendments and clarifications to specific Future Urban Zone, subdivision and Rural Lifestyle Zone provisions to provide a more workable consenting pathway, avoid unnecessary restrictions on landowners, and ensure the rules better reflect the intended function of those zones.

j. The Submitter seeks clarification of the application of the average site area requirement so that the calculation applies to developable residential allotments and does not include roads, reserves, service lots, stormwater lots or other vesting parcels.

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

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6.0 SUMMARY OF RELIEF SOUGHT

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

PC4 provision / map / topic	Position	Reasons	Decision / relief sought
Planning Maps — residual General Rural Zone land between the Rural Lifestyle Zone and Growth Cell 5	Amend	The retained General Rural Zone pocket creates an irregular zoning pattern between areas identified for rural lifestyle and residential growth.	Amend the planning maps to rezone the residual General Rural Zone land to Rural Lifestyle Zone and/or General Residential or otherwise integrate it into an appropriate growth framework.
Planning Maps — access to Putāruru Growth Cell 5 from Arapuni Road	Amend	The access should be subject to same zoning to enable practical and efficient development of Growth Cell 5.	Amend the planning maps so the access to Putāruru Growth Cell 5 from Arapuni Road is also zoned General Residential Zone.
SUB-O6	Amend	The wording is restrictive for landowners seeking to undertake early-stage subdivision or enabling works that would not compromise future urban development.	Amend the objective and allow for practical subdivision outcomes such as boundary rationalisation, early enabling works, or other low-impact subdivision in the FUZ.
SUB-P2	Amend / clarify	Clarify that subdivision can occur where safe, flood-free and stable building platforms are provided at the time of subdivision as the current phrasing and use of “avoiding” makes this unclear.	That “avoiding” be replaced with wording that clearly allows subdivision where natural hazard risks can be appropriately avoided, managed or mitigated, and where safe and stable building platforms can be provided, without compromising future development.

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SUB-R3	Amend	The discretionary activity status does not provide a clear consenting pathway when the requirements of a DCP have been met.	Amend the activity status from discretionary to restricted discretionary where subdivision is supported by an accepted DCP and complies with the relevant Development Area Plan.
SUB-P20 – Development Concept Plan	Amend / clarify	The Submitter supports the use of Development Concept Plan (DCP) for the comprehensive and integrated development for the entire development but considers detailed engineering, servicing, staging and subdivision design should remain capable of being resolved through the subsequent consenting processes. As drafted, SUB-P20 creates uncertainty as it states that subdivision in a District Growth Cell must not occur unless a DCP has been approved by Council and approved by way of a resource consent. However, there is no corresponding rule framework that provides for this.	Amend SUB-P20 to clarify that a DCP is to be submitted and assessed as part of the relevant subdivision consent application, unless a separate DCP approval process is expressly provided for in the rules. If a separate process is intended, Council should include a clear rule framework, activity status, assessment matters and process.
SUB-INFO-R2	Amend / clarify	PC4 requires substantial information to be provided through the DCP approval. The information requirements could impose significant costs and may not be proportionate to the scale, nature and stage of development proposed.	Amend SUB-INFO-R2 and any related provisions to clarify that a DCP may be prepared at a high-level basis where appropriate, while allowing detailed technical assessments to be provided through subsequent subdivision stages. Ensuring the DCP is proportionate to the scale, nature and stage of the subdivision proposed.

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			The level of information should be proportionate to the scale, nature and stage of the subdivision proposed.
SUB-R2(6) – Subdivision within District Growth Cells	Amend / clarify	As outlined above, the corresponding policy SUB-P20 appears to anticipate two separate approval concepts, however this rule suggests the DCP and subdivision can be lodged and assessed concurrently.	Amend this rule to confirm that the DCP and subdivision can be lodged and assessed concurrently or if Council intends a separate approval mechanism, a specific rule should be inserted providing an activity status, matters of discretion / assessment criteria, and process for the approval of a DCP independent of a subdivision consent application.
SUB-R5(1)(a) – General Residential Zone minimum lot size	Support	Support retaining the proposed reduction in minimum lot size to 300m².	Retain.
SUB-R5(1)(b) – Average site area for multiple additional sites	Support/ clarify	Support retaining the proposed 450m² average site area requirement for multiple additional sites. Clarification is sought as to how the average is calculated.	Retain.
FUZ-P3(i) and FUZ-R3	Amend	As currently drafted these provisions are unduly restrictive on landowners. More than one dwelling should not be automatically treated as non-complying on FUZ land.	Provide a restricted discretionary pathway for additional dwellings where they would not compromise future urban development.
Rural Lifestyle Zone R6(3)	Amend	Review the blanket 10% building coverage limit so it better supports why people chose to live in the Rural Lifestyle Zone.	Either increase the permitted building coverage limit or introduce a graduated standard that better reflects different lot sizes and the intended function of the Rural Lifestyle Zone.

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INF-P2 and INF-P3 – Infrastructure servicing	Amend / clarify	The provisions require infrastructure servicing to be secured before development occurs but do not clearly identify what is required to demonstrate that infrastructure is “secured”.	Clarify what constitutes infrastructure being “secured”, including whether physical construction, funding agreements, development agreements or an agreed staged delivery programme may satisfy the requirement. Provide for staged infrastructure delivery where appropriate and clarify the evidence and triggers required to demonstrate servicing is secured.
HUE allocations / development capacity	Amend / clarify	Fixed HUE allocations may unnecessarily constrain development where infrastructure capacity becomes available earlier than anticipated or unused capacity remains available.	Include a policy or method enabling HUE allocations to be periodically reviewed where infrastructure capacity changes, including a mechanism to reassess or reallocate unused HUE capacity where appropriate.
SUB-P19 – Connectivity to Growth Cells and FUZ land	Amend / clarify	Connectivity is supported in principle but should not unnecessarily prevent future subdivision layouts or require connections that are impractical due to site circumstances or fragmented ownership.	Amend SUB-P19 to provide that connectivity is required where practicable and consistent with the efficient development of both sites.
Consequential amendments	Amend as required	Consequential amendments may be required to ensure the submission points and relief sought are fully and consistently implemented.	Make any consequential amendments to the planning maps, subdivision provisions, growth-cell rules, assessment criteria, servicing provisions and any other relevant District Plan provisions necessary to give effect to this submission.

Kind regards

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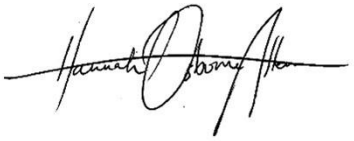

Hannah Osborne-Allen

Planner

Nicholson Surveying Ltd

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