From: "Sarah Duffy" <SarahD@maven.co.nz>
Sent: Wed, 2 Sep 2026 12:58:53 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Cc: "James Bailey" <james@momonafarms.co.nz>; "Ella Bailey" <ella@momonafarms.co.nz>; "Shanan Mowatt" <ShananM@maven.co.nz>
Subject: Submission on Plan Change 4: Urban Growth
Attachments: Attachment A - Richard Knott Urban Design PC4 Tirau 31 08 2026.pdf, 260902 - Submission_SWDC PC 4.pdf

Kia ora,
Please find attached a submission on behalf of Momona Land Limited in relation to Plan Change 4: Urban Growth.

The submission sets out our position on the proposed changes and the relief sought.

Can you please confirm receipt of the submission.

Kind Regards,

Sarah

Sarah Duffy
PRINCIPAL – MAVEN BAY OF PLENTY
BEM (Policy and Planning), Assoc. NZPI

MAVEN BOP LIMITED
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Richard Knott Limited

Urban Design | Masterplans | Built Heritage
Town Planning | Landscape and Visual Assessment

To: Sarah Duffy, Principal – Maven Bay of Plenty

From: Richard Knott

Date: 31st August 2026

Re: South Waikato District Plan – Plan Change 4
Land at Tirau

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1. Introduction

You have asked that I consider the urban design matters raised by the rezoning of land owned by Momona Land Limited in Tirau, notably Growth Cells 1, 2 and 3 to be rezoned to Residential, and Growth Cell 4 to be rezoned Future Urban.

I visited the site and local area on the 22 July 2026.

In preparing this memorandum I draw upon my over 35 years' experience in urban design, heritage and planning.

My recent relevant experience includes:

- A structure plan for land on the edge of Marton for Rangitīkei District Council. This in particular considered pedestrian/cycle and vehicular connections to the existing town, as well as the locations of future open space (much of which was aligned with existing gulleys).
- A structure plan for land owned by Woolworths NZ, included as part of a private plan change application. This looked to ensure connectivity to existing commercially zoned land and also identified areas for landscaping and key building frontages.
- Masterplans for Ōpōtiki Town Centre, Ōpōtiki Harbour and Wharf, Papakura Town Centre, a greenfield site in Foxton Beach, Featherston (with Ree Anderson Consulting) and a spatial plan for Taumarunui (with Ree Anderson Consulting).

2. Comments on Proposed Rezoning

The land proposed to be rezoned is accessed only from Church Street and Parapara Road:

- Parts of the land are steeply sloping:
    - Thought will likely need to be given to the future minimum lot sizes required to deliver the development on this land, recognising that the challenging landform may lead to some new lots being larger than might usually be seen within the Residential Zone and there may be more land than is typical within the area which is not able to be efficiently developed.
- Reliance on a single point of entry to Growth Cell 1, and a single point of entry to each Growth Cell 2, 3 and 4:
    - This will place pressure on the intersections of Church Street, Hillcrest Street and (likely to a lesser extent) Kittow Street with State Highway 1; future residents will have no option but to use these intersections and SH1 itself to move around Tirau for their day-to-day trips.
    - There is no option for residents of Growth Cell 1 to connect to Parapara Road to visit the Tirau Supermarket without having to travel along SH1. This requires them to use the Church Street – SH1 intersection, located on a section of SH1 where tourists and other users of SH1 are looking to park or are sometimes making unexpected manoeuvres, and then turn into Hillcrest Street from SH1, in an area where drivers on SH1 who are unfamiliar with Tirau are beginning to think about stopping to visit shops, cafes or other facilities.

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- This is in contrast to the existing residential streets to the north of SH1, which form a connected grid with SH1. This grid provides options for residents to move around the area without the need to travel on SH1. This grid layout likely spreads the movements onto SH1 between the available intersections and also provides options for all users including pedestrians and cyclists to easily move through the area on routes which have less traffic than SH1 (this is illustrated on Figure 1)

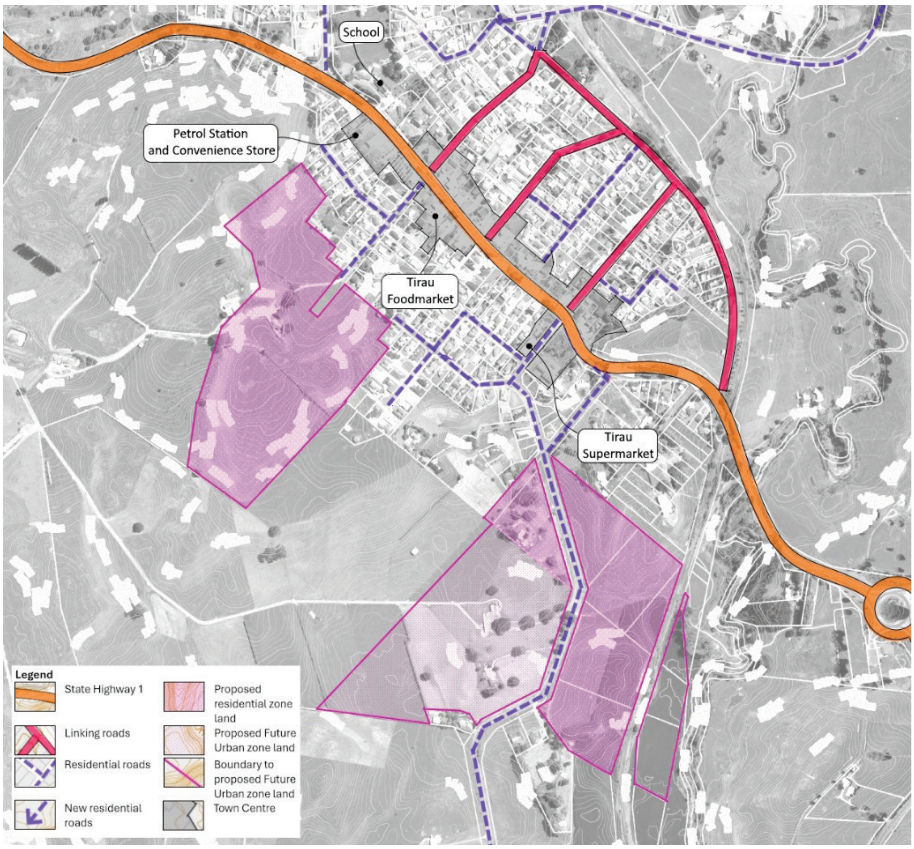

Figure 1: Existing road network in Tirau, illustrating the connected grid formed by the roads to the north of SH1 (with SH1 completing this grid)

3. Response to PC4

Given the matters that I have noted above, I consider that there would be significant benefit in amending PC4 to include additional land between Growth Cell 1 and Growth Cell 4 (identified as Growth Cell 5 on the Maven plans):

- This will help to offset the likely reduced yield which results from the challenging topography.
- Vehicular and active mode connections can be made between Church Street and Parapara Road, providing the opportunity for future residents to move through the area without using SH1, and will result in less pressure on the Church Street – SH1 intersection.
- By necessity and to ensure an efficient layout, it is likely that the connecting street would be required to follow the gentlest slopes across the area; taking pedestrians and cyclists along the same route, rather than separate routes dedicated to them will ensure that they also benefit from the gentler slopes. This will likely encourage greater active transport movements in the area than would be seen with the existing proposed PC4 zoning where they must travel along SH1.
- Ensuring that buildings front the connecting street will also ensure that good passive surveillance is provided of these routes. Dwellings overlooking these streets would improve the safety and security of pedestrian, cyclists and other road users. This in turn is likely to encourage a greater number of

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residents to walk or cycle through the new development to access existing services, further reducing additional traffic moving onto and using SH1.

- This improved connectivity will improve the legibility of the new residential areas, as they will be viewed/used as a whole along with the existing residential and commercial areas, rather than as discrete areas (visited only by residents). Residents of the existing residential areas and the new houses will move through the newly developed areas on a day to day basis. This will result in Tirau being used and viewed as a whole connected settlement, through legible connections, rather than a spine road with discrete subdivisions located along side it.
- There would benefit in reconsidering the proposed staging of the land (i.e. which land is zoned Residential and which is zoned Future Urban:
    - Zoning/staging land from east to west across the Growth Cells would ensure that Growth Cell 1 is not developed until such time as Parapara Road is available as an alternative access to the area. The logical order to develop the land would therefore be:
        - Growth Cells 2, 3 and 4 – these have direct access to Parapara Road and will connect with SH1 via Hillcrest Street. Developing this land will not lead to the greater use of the Church Street – SH1 intersection, which as noted above is located on a section of SH1 where tourists and other users of SH1 are looking to park or are sometimes making unexpected manoeuvres,
        - Next, Growth Cell 5, which will be able to connect to Parapara Road (and SH1 via Hillcrest Street) through the developed land in Growth Cell 3, and so not lead to the greater use of the use the Church Street – SH1 intersection.
        - Last Growth Cell 1, which will be able to be accessed both from Church Street and Parapara Road (via the developed land on Growth Cell 3 and 5). The availability of this alternative Parapara Road access to the land will lead to less additional use of the Church Street-SH1 intersection than would be the case were this land developed before the alternative route was available.
        - At this time the whole, connected grid street network will be available to the south of SH1, mirroring the connected network located to the north of SH1, and allowing traffic movements to be spread across all of the available connections to SH1.

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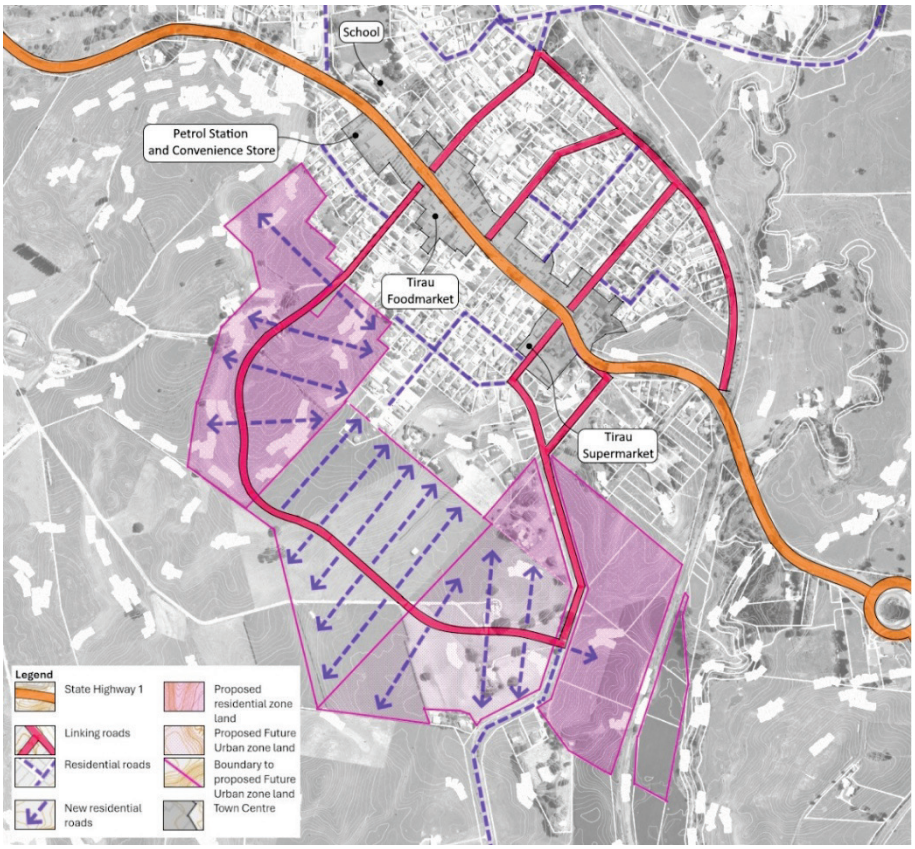

Figure 2: Potential link through Growth Cells, improving connectivity and legibility of the area (NOTE: 'NEW RESIDENTIAL ROADS ARE DIAGRAMTIC ONLY)

4. Conclusion

As outlined above, I consider that to achieve a successful expansion of Tirau it is important to consider not just what land is to be rezoned, but the future connections between these areas and with the existing residential and commercial areas. Ensuring that the rezoning does not result in isolated subdivisions which are poorly connected to the existing residential areas will ensure that residents and visitors experience Tirau as a single, connected and usable place, which is easy to move about by active modes and by car, and which is a desirable place to live.

The plans prepared by Maven in support of this submission have 'truth checked' the ability to achieve these connections whilst working with the landform, and have realistically considered the yield which can be achieved in each Growth Cell.

Based on the above, I support the residential zoning of the land located between Growth Cell 1 and Growth Cell 4 (identified as Growth Cell 5 on the plans prepared by Maven).

Richard Knott MNZPI MRTPI IHBC IHE

Richard Knott Limited
PO Box 272-1352, Papakura, 2244
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SURVEYING • ENGINEERING • PLANNING

SUBMISSION ON PROPOSED PLAN CHANGE 4 - SOUTH WAIKATO DISTRICT PLAN

Under Clause 6 of Schedule 1, Resource Management Act 1991

To:
The Chief Executive
South Waikato District Council

Date: 2 September 2026

1.0 SUBMITTER DETAILS

Full name of submitter	Momona Land Limited
Contact Name	James and Ella Bailey
Postal address	848 State Highway 1 RD1 Tirau, 3484
Phone	[redacted]
Email	James@MomonaFarms.co.nz
C/- Agent:	Sarah Duffy Principal Planner Maven Matamata Limited [redacted] SarahD@Maven.co.nz

2.0 INTRODUCTION AND SITE DETAILS

2.1. This is a submission on Proposed Plan Change 4: Urban Growth to the Operative South Waikato District Plan.

2.2. The submitter could not gain an advantage in trade competition through this submission.

2.3. The submitter is directly affected by Plan Change 4 with respect to the following land parcels;

- The whole of Tirau Growth Cell 1 (Church Street);
- The whole of Tirau Growth Cell 3 (Parapara Road East);
- The whole of the notified Tirau Future Urban Zone (residential) at Parapara Road West of approximately 10.86 hectares;
- Land of approximately 13.86 hectares lying between Growth Cell 1 and that Future Urban Zone;

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- Land east of the railway at Parapara Road proposed to be rezoned from Rural Lifestyle Zone to General Rural Zone; and
- Land to the south of Growth Cell 3.

2.4. The land described above is further detailed in Table 1-1.

TABLE 2-1: RELEVANT RECORD OF TITLES

Record of Title	Appellations	Size	Described as:
610308	Lot 2 Deposited Plan 462492	50.8541 hectares more or less	• PC4: Tirau Growth Cell 1, • Balance General Rural Zone.
286968	Lot 2 Deposited Plan 370814	47.6737 hectares more or less	• PC4: Tirau Future Urban Zone (residential) Parapara Rd West (approx. 10.86 ha); • Land proposed as Tirau Growth Cell 5 approx. 13.86 ha between TGC1 and the proposed Future Urban Zone, • balance General Rural Zone.
SA13C/227	Lot 13-15, 25 Deposited Plan 5043 and Lot 2 Deposited Plan South Auckland 13028 and Part Lot 29 and Part Lot 30 Deposited Plan 5043 and Part Lot 1 Section 3 Block II Patetere North Survey District	23.9311 hectares more or less	• PC4: Tirau Growth Cell 3 • Rural lifestyle zone land on eastern side of railway line proposed to rezone to General Rural zone (2.16ha) • General Rural zoned land comprising of the balance of the parcel

3.0 OVERVIEW OF THE SUBMISSION

3.1. The submitter generally **supports** the purpose of Plan Change 4 in providing for the growth within the District, and supports the identification of its landholdings as the district's principal residential growth in Tirau.

3.2. The submitter generally supports the rezoning of Tirau Growth Cell 1 (Church Street) and Tirau Growth Cell 3 (Parapara Road East) to General Residential Zone, and supports the Development Area Plans prepared for those cells at Chapters 17 and 18. Nothing in this submission seeks the removal, relocation or reduction of any residential capacity provided for by Plan Change 4. The submission seeks that more capacity be provided, and that the capacity provided be able to be delivered.

3.3. Relief is sought on five matters – HUE allocations for the Tirau Growth cells, the extent of live zoned land in Tirau, rural lifestyle land, staged delivery, and Geotechnical/Natural Hazards assessments.

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4.0 POINT 1
MAXIMUM HUE ALLOCATIONS FIXED FOR THE TIRAU GROWTH CELLS

4.1. GRZ-R6(5) and (7) and SUB-R5(1)(j) and (l) fix maximum Household Unit Equivalents for Tirau Growth Cells 1 and 3 at 109 HUE and 65 HUE respectively. Those figures are drawn from the yield ranges in the Development Area Plans report at Attachment 2 to the Section 32 evaluation.

TABLE 2-1: NOTIFIED HUE CAPS COMPARED WITH THE YIELD RANGES

Growth cell	Area (ha)	Yield range in S32 Att. 2	Notified cap	Cap relative to range
Tirau GC1 (Church St)	13.61	88–131	109	approx. midpoint
Tirau GC2 (Parapara Rd W)	not assessed	none identified	12	no stated basis
Tirau GC3 (Parapara Rd E)	8.80	58–87	65	below midpoint
Tokoroa GC1 (Parkdale St)	23.94	255–383	**420**	**above upper end**
Tokoroa GC2 (Richmond Ave)	8.69	48–72	**91**	**above upper end**

4.2. Three matters follow from that comparison.

- **The methodology is not applied consistently.** The caps for the two Tokoroa cells were set above the upper end of the ranges identified by Council's consultants. The caps for the two Tirau cells were set at or below the midpoint of those ranges. No reason for that difference is apparent from the notified documents.
- **The servicing assessment underpinning the Tirau figures has not been completed.** Table 4-1 of Attachment 2 records the three-waters yield for Tirau – Church Street as requiring revision, and for Tirau – Parapara Road as not yet assessed. The Tirau caps therefore appear to rest on no current servicing assessment.
- **The density assumption has been superseded by Plan Change 4 itself.** The ranges were calculated on an assumed average lot size of 450m². Plan Change 4 reduces the minimum lot size in the General Residential Zone to 300m², introduces duplex and terraced housing at an average net site area of 150m² per residential unit (GRZ-R5(5)), increases building coverage to 55% and height to 11m. The caps therefore constrain the very intensification that Plan Change 4 enables, and work against UFD-O1(h), UFD-P6 and UFD-P13.

4.3. The report records that the yields were estimated in order to inform transport and high-level civil inputs, and that the ultimate yield of each area would be determined through the development and consenting processes.

4.4. The development yield should be determined through subdivision design and technical assessment, including confirmation of geotechnical suitability, natural hazards, transport effects, stormwater management and water and wastewater servicing capacity. These investigations will establish the appropriate development extent, density and staging and provide a more robust basis for managing infrastructure demand than an arbitrary planning cap.

4.5. The HUE allocation is Council's measure of the demand a growth cell places on infrastructure. Yet GRZ-P8 and GRZ-P9 impose a requirement that capacity be secured for the whole of the cell before any development occurs. The landowner is therefore tested twice on the same effect.

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4.6. Relief Sought

The relief sought is directed at the mechanism rather than at the numbers alone. The submitter seeks:

- That the caps for the Tirau Growth Cells be removed.

As an alternative to this relief sought, we recommend the following actions;

- That compliance be sufficient — development not exceeding the Household Unit Equivalents allocated to a growth cell is not required to demonstrate that infrastructure capacity has been secured for the whole cell prior to development commencing on individual stages;
- That exceedance be expressly provided for — that the Plan record that development exceeding the allocated Household Unit Equivalents may be provided for where infrastructure capacity is available or able to be provided and the development achieves a high standard of design and the efficient use of residential land. Assessment of this should be assessed as a restricted discretionary activity with limited specified assessment criteria;
- That the figures be set at the upper end of the Council's ranges.

4.7. As notified, there are no objectives or policies which anticipate development above an allocation, and under section 104(1)(b) a consent authority must have regard to the objectives and policies of the Plan. A discretionary pathway which the policy framework does not support is not a pathway that can be relied on.

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5.0 POINT 2
THE EXTENT OF RESIDENTIAL LIVE-ZONED LAND AT TIRAU

5.1. Plan Change 4 proposes approximately 10.86 hectares at Parapara Road West in the Future Urban Zone and leaves approximately 13.86 hectares lying between Growth Cell 1 and that Future Urban Zone in the General Rural Zone.

5.2. Relief Sought

The submitter seeks that both Growth Cell 1 and the Future Urban zone areas be zoned General Residential Zone and identified as District Growth Cells, being Tirau Growth Cell 4 (the land presently proposed as Future Urban Zone) and adds Tirau Growth Cell 5 (the intervening land). This is indicated in figure 1-1, below.

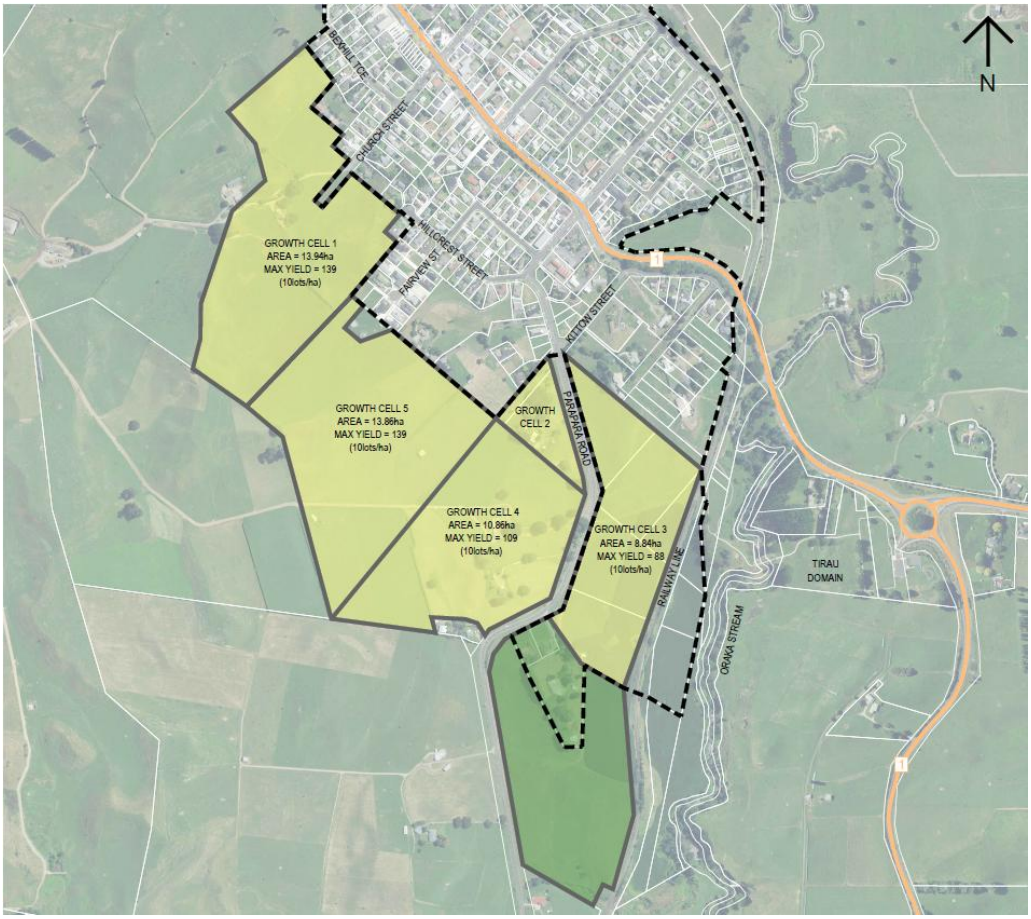

FIGURE 1-1: GROWTH CELLS PROPOSED

5.3. Live zoning is a more efficient and effective method of achieving UFD-O1, UFD-O3 and INF-O3 for this land. Under FUZ-M1 and INF-P15, land in the Future Urban Zone reaches live zoning only after a Development Area Plan has been prepared by landowners and a further plan change has been promoted. The Plan identifies no process, criteria, timeframe or Council obligation for either step. Live zoning with a HUE cap, a Development Area Plan and restricted discretionary subdivision status under SUB-R2(6) gives the Council the same control over the rate and sequencing of release and does so sooner and at materially lower process cost.

5.4. The whole of the affected land is in the submitter's ownership. A single comprehensive Development Area Plan can be prepared, development can be staged in an orderly sequence, and a private developer

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agreement under INF-PR3 can be entered into without the need to coordinate multiple parties. That materially improves the deliverability of Plan Change 4 at Tirau.

5.5. The submitter has obtained an urban design assessment from Richard Knott – Urban Designer, which accompanies this submission as **Attachment A**. As notified, Growth Cell 1 has a single point of entry and Growth Cells 2, 3 and 4 share a single point of entry, so future residents will have no alternative to State Highway 1 for local trips, including trips between Growth Cell 1 and the shops on Parapara Road. He contrasts that with the connected street grid north of the state highway, which distributes movement between intersections and gives pedestrians and cyclists routes away from the state highway.

5.6. Mr Knott suggests that including the intervening land would enable a vehicular and active mode connection between Church Street and Parapara Road, reduce pressure on the Church Street / State Highway 1 intersection, allow a connecting street to follow the gentlest available grades so that walking and cycling are practical, and result in Tirau being used and read as a connected settlement rather than a spine road with discrete subdivisions alongside it. Mr Knott noted that including more land would allow more lots to be delivered over time, notwithstanding the topography, and he supports the residential zoning of the land between Growth Cell 1 and Growth Cell 4. That land is the land identified in this submission as Tirau Growth Cell 5.

5.7. For the purpose of this exercise, we have developed a draft masterplan. The indicative alignment has been tested against the existing topography and demonstrates that a practicable road corridor can be achieved through Growth Cell 5 within acceptable maximum gradients. This also demonstrates how an integrated approach can greatly improve connectivity and a sense of community within Tirau. This is shown in Figure 1-2 below.

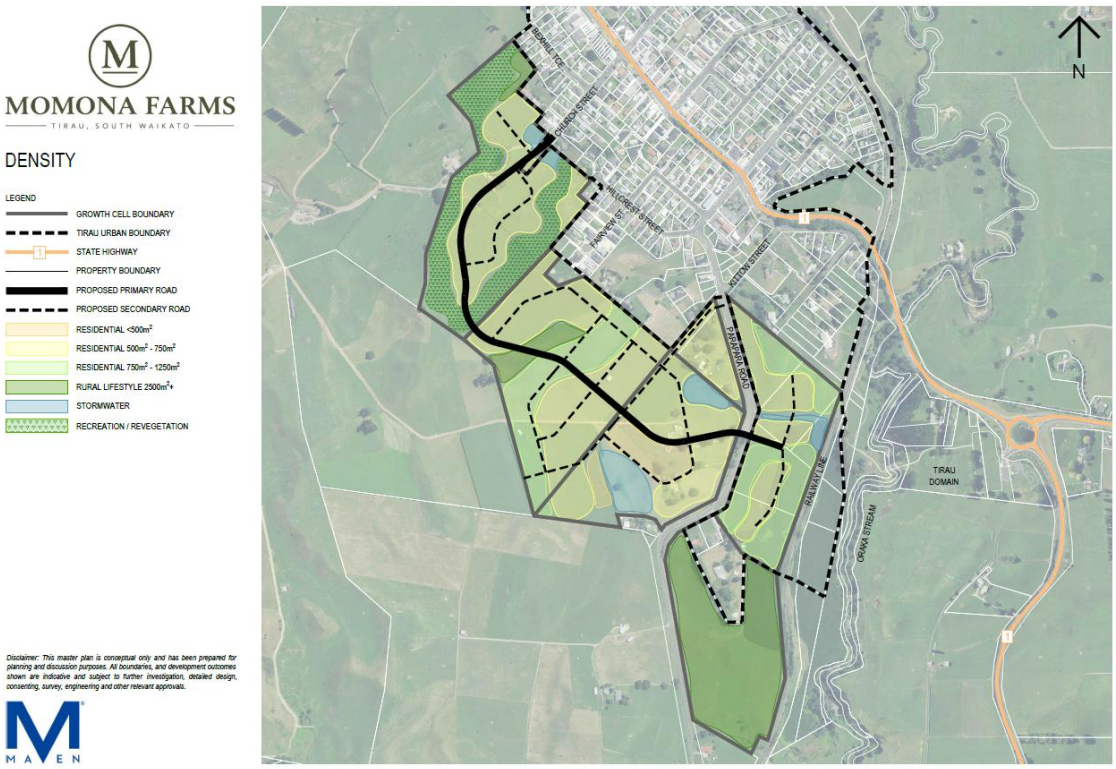

Figure 1-2: Masterplan

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5.8. The Clearwater Test

The Clearwater test is concerned with whether the relief sought is sufficiently connected to the notified plan change and whether accepting the relief would result in an amendment to the planning instrument without providing affected persons with an effective opportunity to participate. This test has two limbs;

1. Does the submission address the extent to which the plan change changes the pre-existing status quo; and
2. Would accepting the submission effectively allow the planning instrument to be amended without giving people who may be affected a real opportunity to participate?

5.9. Plan Change 4 seeks to provide for future growth in Tirau. This submission directly addresses the extent and configuration of that future growth. This submission proposes a logical extension of the growth areas identified by PC4, with the inclusion of the intervening land providing for a connected network of streets and a more coherent pattern of residential development, rather than creating discrete pockets of development that do not interconnect. The relief sought therefore directly relates to the change to the existing status quo advanced by PC4, being the identification and provision for future residential growth in Tirau. Accordingly, the submission satisfies the first limb of the Clearwater test.

5.10. Landowners and other parties affected by PC4 have been provided with an opportunity to participate through the public plan change process. The proposed extension to Growth Cell 5 is limited in extent and is located between two areas already identified through PC4 for future urban and residential development. The requested inclusion of the intervening land does not introduce a new growth location or a different form of development. Rather, it seeks to modify the extent and configuration of the residential growth area contemplated by PC4, providing for a more logical and connected pattern of urban development and improved connectivity and accessibility within Tirau. Accordingly, this satisfies the second limb in that the relief sought is directly connected to the changes to the existing planning framework proposed by PC4 and is within the scope of the notified plan change.

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6.0 POINT 3
RURAL LIFESTYLE LAND

6.1. Plan Change 4 proposes to rezone the Rural Lifestyle Zone east of the railway line at Parapara Road to General Rural Zone. We oppose the rezoning and seek that the Rural Lifestyle Zone be retained. As a single general rural parcel as proposed, this land parcel is inaccessible and unproductive. Ideally an easement would be created over South Waikato District Council owned Recreation Reserve to the immediate north to provide direct access.

6.2. The submitter also seeks that the balance of title SA13C/227, including land to the south of Growth Cell 3, and east of the railway line be zoned Rural Lifestyle Zone as a logical transition to the rural zone. Plan Change 4 makes that General Rural to Rural Lifestyle transition elsewhere in the district, between Alexander Crescent and Walsall Rise at Putāruru.

6.3. With respect to the Clearwater test, the first aspect of the submission, which seeks retention of the Rural Lifestyle Zone over the land east of the railway line at Parapara Road, is “on” with respect to Plan Change 4. The notified plan change proposes to alter the existing zoning of that land from Rural Lifestyle to General Rural. The submission directly addresses that proposed change and seeks that the existing zoning be retained. Accordingly, the relief sought directly responds to the alteration to the status quo proposed by Plan Change 4 and would not result in any appreciable extension of the notified scope of the plan change.

6.4. The second aspect of the submission seeks that additional land comprising the balance of title SA13C/227, including land south of Growth Cell 3 and east of the railway line, be zoned Rural Lifestyle. This relief requires greater consideration under the Clearwater test because it seeks a zoning change beyond the land expressly identified for rezoning in the notified plan change.

6.5. Plan Change 4 adopts a similar Rural Lifestyle transition elsewhere in the district, between Alexander Crescent and Walsall Rise at Putāruru. Given that the additional land discussed within this section is sufficiently proximate and connected to the land subject to the notified rezoning, and the extent of the requested zoning change being relatively limited, I consider there is a reasonable basis for concluding that the relief remains consistent with the scope of Plan Change 4.

6.6. Relief Sought

That the Rural Lifestyle Zoning proposed to be rezoned General Rural Zone on the eastern side of the railway line be retained as Rural Lifestyle Zone.

That the balance of title SA13C/227, including land to the south of Growth Cell 3, and east of the railway line be zoned Rural Lifestyle Zone.

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7.0 POINT 4 STAGED DELIVERY

7.1. GRZ-P8 and GRZ-P9, replicated at INF-P2 and INF-P3, direct that a growth cell is not to be developed until infrastructure capacity sufficient for the whole of that cell is secured. They operate as a precondition on the first consent in every cell and leave no pathway for staged delivery. We do not oppose the principle that development should be serviced.

7.2. Relief Sought

This submission seeks amendments which permit development to proceed in stages, where the infrastructure necessary to service each stage is secured.

8.0 POINT 5 GEOTECHNICAL / NATURAL HAZARDS ASSESSMENT

8.1. High-level geotechnical investigations should be undertaken for the proposed Growth Cell areas to establish whether the land is suitable and viable for the anticipated development. This should include consideration of ground conditions, slope stability, and any other geotechnical constraints that may materially affect the ability to develop the land.

8.2. This information is necessary to provide confidence that the proposed Growth Cell areas represent realistic and developable areas, and to ensure that potential geotechnical constraints are identified at an early stage. Where significant constraints are identified, these should be reflected in the extent, layout or development requirements of the Growth Cell.

8.3. Relief Sought

That high-level geotechnical investigations be undertaken for the proposed Growth Cell areas, at a level of detail proportionate to the Plan Change, prior to confirmation of the Growth Cell boundaries and/or zoning.

9.0 APPROACH TO THIS SUBMISSION

9.1. The submitter's position on each provision is stated as Support, Support in part, Oppose, or Oppose in part, in accordance with Clause 6 of Schedule 1 to the Act.

9.2. Where amendments to specific wording are proposed, they are offered to assist the Council and are not intended to limit the relief sought. Proposed insertions are shown in **bold** and proposed deletions are shown in ~~*strikethrough*~~.

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10.0 PLANNING MAPS — TIRAU

10.1. The relief sought on the Planning Maps is set out below. In summary;

- Supports the rezoning proposed for Growth Cells 1 and 3;
- Seeks live zoning of the notified Future Urban Zone (FUZ) and of proposed Growth Cell 5 - the land between FUZ and Growth Cell 1 as two further growth cells; and
- Seeks the retention or application of the Rural Lifestyle Zone on the balance of its holding of SA13C/227.

TABLE 4-1: DECISIONS SOUGHT — PLANNING MAPS

Provision	Position	Reasons	Decision sought
Planning Maps — Tirau Growth Cell 1 (residential), Church St (General Rural Zone to General Residential Zone)	**Support**	The rezoning provides live-zoned residential capacity adjoining the existing urban area and within walking distance of the Town Centre Zone. The submitter owns the whole of the cell and is able to prepare a single Development Area Plan and staging sequence for it. The submitter's concern with this cell is directed at the HUE allocation only and is addressed in the following section.	**Retain** the rezoning and the identification of the land as a District Growth Cell, and **retain** the Development Area Plan at Chapter 17, subject to the relief sought on GRZ-R6(5), SUB-R5(1)(j) and the Chapter 17 road network.
Planning Maps — Tirau Growth Cell 3 (residential), Parapara Rd east (Rural Lifestyle Zone to General Residential Zone)	**Support**	The rezoning is supported for the same reasons. The land adjoins the existing urban area, is in the direction of the wider growth front, and is in the submitter's ownership. The submitter's concern is directed at the HUE allocation only.	**Retain** the rezoning and the identification of the land as a District Growth Cell, and **retain** the Development Area Plan at Chapter 18, subject to the relief sought on GRZ-R6(7) and SUB-R5(1)(l).
Planning Maps — Tirau Future Urban Zone (residential), Parapara Rd west (General Rural Zone to Future Urban Zone) Approximately 10.86 ha, being part of Record of Title 286968, Lot 2 DP 370814 (47.6737 ha). The balance of that title is General Rural Zone and no change to it is notified or sought.	**Oppose in part**	The land adjoins the existing urban area and Growth Cell 2, and adjoins the land identified in the row below, which in turn adjoins Growth Cell 1. Zoned live, the three areas form a contiguous growth front able to be developed progressively under an integrated set of Development Area Plans. Future Urban zoning defers delivery to a further plan change under FUZ-M1 for which the Plan identifies no process, criteria, timeframe or Council obligation. No Development Area Plan has been prepared for this future urban zone, no yield has been estimated for it, and no area for it is stated in the notified documents. Live zoning, with a HUE allocation, a Development Area Plan and restricted discretionary subdivision status under SUB-R2(6), achieves the same control over the rate of release more efficiently and effectively, consistent with UFD-O1, UFD-O3, UFD-P2(d) and INF-O3.	**Amend** the Planning Maps to zone the land **General Residential Zone** and to identify it as a new District Growth Cell — **Tirau Growth Cell 4 (residential), Parapara Road West** — with consequential amendments to GRZ-R6, SUB-R5(1), SUB-R2(6)(b), FUZ-M1 and the list of future urban zones in Chapter 14.3. For the avoidance of doubt, the land identified as Tirau Industrial Growth Cell 4 in Attachment 2 to the section 32 evaluation is zoned Future Urban Zone (industrial) under Plan Change 4 and is not a District Growth Cell. No relief is sought in respect of that land. **In the alternative**, **retain** the notified Future Urban Zone over the land.

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Provision	Position	Reasons	Decision sought
		The whole of the land is in the submitter's ownership.	
Planning Maps — the approximately 13.86 ha between Tirau Growth Cell 1 and the notified Tirau Future Urban Zone (part Lot 2 DP 462492; General Rural Zone, no change notified)	**Relief sought**	As notified, Plan Change 4 rezones the land on both sides of this parcel but leaves the parcel itself General Rural, producing a severed growth front: a live-zoned cell at Church Street, an unzoned gap, and a Future Urban Zone beyond it. The parcel shares common boundaries directly with both. Including it produces a single contiguous growth front able to be delivered progressively from either end, rather than two disconnected fronts. It is in the same ownership as the land on either side. The relief is fairly and reasonably raised by the rezoning proposals for the adjoining land. Plan Change 4 rezones the immediately adjoining land from General Rural Zone to General Residential Zone (Growth Cell 1) and from General Rural Zone to Future Urban Zone (Parapara Road West). Both transitions sought are transitions the plan change itself makes on land sharing a boundary with this parcel.	**Amend** the Planning Maps to zone the land **General Residential Zone** and to identify it as a new District Growth Cell — **Tirau Growth Cell 5 (residential)** — with consequential amendments to GRZ-R6, SUB-R5(1) and SUB-R2(6)(b). **In the alternative**, zone the land **Future Urban Zone (residential)** and extend the notified Tirau Future Urban Zone over it.
Planning Maps — rezone the Rural Lifestyle Zone east of the railway line, Parapara Rd, Tirau to General Rural Zone (Rural Lifestyle Zone to General Rural Zone)	**Oppose**	The land is severed from the balance of the submitter's holding by the rail corridor and has limited standalone productive utility. It is of a scale and character suited to rural lifestyle living rather than general rural production. Rezoning to General Rural Zone would apply the minimum site areas in SUB-R5(3)(a) and (b) to the land, which would prevent any subdivision of it and would remove the rural lifestyle capacity the operative Plan presently provides. No evaluation supporting the removal of that capacity is apparent from the notified documents.	**Delete** the proposed rezoning and **retain** the **Rural Lifestyle Zone** over the land.
Planning Maps — the submitter's land to the south and east of Tirau Growth Cell 3, including Part Lot 30 DP 5043 (no change notified)	**Relief sought**	The land adjoins land the subject of rezoning proposals under Plan Change 4 and shares the characteristics of land proposed to be zoned Rural Lifestyle elsewhere in the district under this plan change. Retaining its current zoning produces an irregular zoning pattern across a single holding. Rural Lifestyle zoning suits the land as a transition between the General Rural Zone, Parapara Road, the railway and the residential growth cells to the north.	**Amend** the Planning Maps to zone the land **Rural Lifestyle Zone**.

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Provision	Position	Reasons	Decision sought
		Plan Change 4 makes the same General Rural to Rural Lifestyle transition between Alexander Crescent and Walsall Rise at Putāruru, so the relief is of a kind the plan change already contemplates.	
Planning Maps — Tirau Growth Cell 2 (residential), Parapara Rd west (Rural Lifestyle Zone to General Residential Zone)	**Support**	The land is not in the submitter's ownership. The submitter supports the rezoning and seeks no change to the extent of the cell. The submitter's position on the HUE allocation for this cell is set out in the following section.	**Retain** as notified.

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11.0 GROWTH CELL HUE ALLOCATIONS — PRIMARY SUBMISSION

11.1. This submission seeks that the HUE caps for growth cells be removed, in favour yield determination reflective of minimum lot sizes, and through subdivision design and technical assessment, including geotechnical suitability, natural hazards, transport effects, stormwater management and water and wastewater servicing capacity. These investigations will establish the appropriate development extent, density and staging and provide a more robust basis for managing infrastructure demand than an arbitrary planning cap.

As an alternative, this submission seeks the following amendments;

11.2. The maximum HUE figures for the Tirau growth cells are fixed twice: as a permitted activity standard in GRZ-R6, and as a subdivision standard in SUB-R5(1). The same relief should be reflected in each place so that the two chapters remain consistent.

11.3. The relief sought is directed at how the allocations operate. The allocation is Council's measure of the infrastructure demand a growth cell generates. Two things should follow from that, and neither presently does.

11.3.1. Compliance with an allocation should be sufficient. A landowner developing within the Household Unit Equivalents the Council has allocated should not be required, in addition, to demonstrate that capacity has been secured for the whole of the cell. As notified, GRZ-P8 and GRZ-P9 require this.

11.3.2. Development above an allocation should be able to be considered on its merits. It presently can be, as a discretionary activity under GRZ-R3 and SUB-R2(6). But no objective or policy in the Plan anticipates it, and the assessment criteria at AA-R4(4) are confined to servicing capacity. A consent authority directed by section 104(1)(b) to have regard to the objectives and policies would find nothing supporting a grant. The submitter therefore seeks a policy and assessment criteria which record that additional yield may be provided for where serviceability and design quality are demonstrated, and that the activity status be proportionate to the matters actually at issue.

11.4. The HUE figures should also be set at no less than the upper end of the ranges identified in the Council's own evaluation.

TABLE 5-1: DECISIONS SOUGHT — HUE ALLOCATIONS AND ACTIVITY STATUS

Provision	Position	Reasons	Decision sought
GRZ-R6(5) and SUB-R5(1)(j) Tirau Growth Cell 1 — 109 HUE	**Oppose in part**	The cap sits at approximately the midpoint of the 88–131 range identified for this cell in Attachment 2 to the section 32 evaluation. The three-waters assessment for the cell is recorded in that report as requiring revision, and the report notes the cell was reduced in area after that assessment was undertaken. No reason is apparent for adopting the midpoint here when the caps for the two Tokoroa cells were set above the upper end of their ranges.	**Delete** the HUE cap for this cell and rely on SUB-R5(1)(a) and (b), the Development Area Plan at Chapter 17, and the infrastructure standards in Chapter 7.2. **In the alternative**, **amend** GRZ-R6(5)(a) and SUB-R5(1)(j)(i) to substitute ~~*109*~~ **131** Household Unit Equivalents, or such greater figure as is supported by the evidence at the hearing.

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Provision	Position	Reasons	Decision sought
		The range was calculated on an assumed 450m² average lot size, which Plan Change 4 supersedes.	
GRZ-R6(7) and SUB-R5(1)(l) Tirau Growth Cell 3 — 65 HUE	**Oppose in part**	The cap sits below the midpoint of the 58–87 range identified for this cell, and the three-waters assessment for it is recorded as not yet undertaken. The same inconsistency of approach and the same superseded density assumption apply. The cell adjoins the wider growth front and is in single ownership, so a higher allocation can be delivered under one Development Area Plan and staging sequence.	**Delete** the HUE cap for this cell. **In the alternative**, **amend** GRZ-R6(7)(a) and SUB-R5(1)(l)(i) to substitute ~~*65*~~ **87** Household Unit Equivalents, or such greater figure as is supported by the evidence at the hearing.
New GRZ-R6(10) and SUB-R5(1)(o) Tirau Growth Cell 4 (Parapara Rd west) — approximately 10.86 ha	**Relief sought**	Consequential on the rezoning sought in the previous section. A new growth cell requires a HUE allocation in each of GRZ-R6 and SUB-R5(1), and a Development Area Plan under SUB-R2(6)(b). Applying the density implied by the Council's Development Area Plans report across Growth Cells 1 and 3, an area of this size supports a yield in the order of 70 to 107 lots. The figure sought is to be confirmed by the masterplan at Attachment B. The whole of the cell is within the submitter's ownership, so a single Development Area Plan and staging sequence can be prepared for it.	**Delete** the HUE cap for this cell. **In the alternative**, **insert** new rules GRZ-R6(10) and SUB-R5(1)(o) setting the maximum for Tirau Growth Cell 4 at 109 HUE, and requiring compliance with the Development Area Plan sought at Chapter 21.
New GRZ-R6(11) and SUB-R5(1)(p) Tirau Growth Cell 5 (between Growth Cells 1 and 4) — approximately 13.86 ha	**Relief sought**	Consequential on the rezoning sought in the previous section, for the same reasons. On the same basis, an area of this size supports a yield in the order of 90 to 137 lots. The figure sought is to be confirmed by the masterplan at Attachment B. Growth Cell 5 adjoins Growth Cell 1 to the east and Growth Cell 4 to the west. Its Development Area Plan should be prepared so that the road, reserve and servicing networks of the three cells connect.	**If HUE's are to remain, insert** new rules GRZ-R6(11) and SUB-R5(1)(p) setting the maximum for Tirau Growth Cell 5 at 139 HUE, and requiring compliance with the Development Area Plan sought at Chapter 22.
GRZ-R6(6) and SUB-R5(1)(k) Tirau Growth Cell 2 — 12 HUE	**Oppose in part**	This land is not in the submitter's ownership, and the submitter seeks no increase or reduction in the capacity allocated to it. The submitter records, however, that no Development Area Plan and no yield range was prepared for this cell in	**Delete** the HUE cap for this cell. **In the alternative**, **retain** the figure as notified.

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Provision	Position	Reasons	Decision sought
		Attachment 2 to the section 32 evaluation, and no basis for the figure of 12 HUE is apparent from the notified documents. That supports the submitter's position that the HUE figures across the Tirau cells were not derived by a consistent or evidenced method.	
New GRZ-P9A Development exceeding an allocated HUE figure	**Relief sought**	Exceedance of an allocation is presently a discretionary activity, but no objective or policy in the Plan anticipates it. Under section 104(1)(b) a consent authority must have regard to the objectives and policies. As notified, those point in one direction only, so the discretionary pathway the rules create has no policy support. A policy which records the circumstances in which additional yield may be provided for gives the pathway content, without displacing the Council's control over servicing. It also allows the allocation to respond to the evidence available at the time of an application, rather than being fixed now on an evidence base the Council's own report describes as provisional.	**Insert** a new policy: *"Provide for subdivision and development within a Residential Growth Cell which exceeds the Household Unit Equivalents allocated to that Growth Cell where it is demonstrated that:* *(a) infrastructure capacity is available, or is able to be provided, to service the development proposed without compromising the servicing of the balance of the Growth Cell; and* *(b) the development achieves a high standard of design and the efficient use of residential land, consistent with the relevant Development Area Plan."*
GRZ-R6 and SUB-R5(1) Status of the HUE figures	**Oppose in part**	The figures are expressed as absolute prohibitions on permitted activities and on subdivision. Read with GRZ-P8 and GRZ-P9, they read as development limits for the cell rather than as thresholds above which consent is required. That reading is not what the rules achieve, but it is how the provisions present, and it will govern how landowners, purchasers and lenders treat live-zoned land.	**Insert** an advice note beneath GRZ-R6 and SUB-R5(1): *"The Household Unit Equivalent figures in this rule are the thresholds above which resource consent is required. They are not a maximum development limit for the Growth Cell. Subdivision and development exceeding these figures may be provided for in accordance with GRZ-P9A."*
AA-R4(4)(a) Assessment criteria where HUE limits are not achieved	**Support in part**	The servicing criteria are supported and are appropriate to the effect at issue. They are, however, the only criteria provided. Nothing directs the consent authority to the quality of the development proposed, its consistency with the Development Area Plan, or the contribution additional yield makes to the efficient use of live-zoned residential land. Those are the matters which distinguish a well-conceived proposal for additional yield from a poorly conceived one, and they should be before the decision-maker.	**Retain** the existing criteria and **insert**: *"(vii) The standard of design of the proposed subdivision and development, including its consistency with the relevant Development Area Plan.* *(viii) The extent to which the additional Household Unit Equivalents proposed contribute to the efficient use of live-zoned residential land and to housing choice and affordability."*

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Provision	Position	Reasons	Decision sought
GRZ-R3 Discretionary status for activities in a growth cell which do not comply with GRZ-R6 or with a Development Area Plan	**Oppose in part**	A consent pathway for exceedance is appropriate and is supported in principle. Its activity status is not. Discretionary status confers an unlimited discretion, so an application for additional yield may be refused on any ground, including grounds unrelated to the effect at issue, which is a demand on infrastructure and the quality of the development proposed. The Council has already drafted matters directed to the first of those effects at AA-R3(1)(b), including the staging matter at (iii) and the funding matter at (v). With the design matters sought above added, restricted discretionary status is the more efficient and effective method under section 32 and is proportionate to the matters actually in issue. This relief is sought in addition to the policy and criteria sought above. If it is not granted, the policy and criteria remain necessary, because they are what give the discretionary pathway content.	**Amend** so that an activity in a District Growth Cell which does not comply with the maximum HUE figure in GRZ-R6 is a **restricted discretionary activity**, with discretion restricted to the matters in AA-R3(1)(b) as amended, together with the design and efficiency matters sought above. **Amend** SUB-R2(6) so that subdivision which does not comply with the maximum HUE figure in SUB-R5(1) is likewise a **restricted discretionary activity** rather than defaulting to discretionary.
AA-R3(1)(b) and AA-R4(4) Matters and assessment criteria where HUE limits are not complied with	**Support in part**	The matters are supported and are appropriate to the effect at issue. Matter (i) is directed to the availability of infrastructure to service development throughout Tirau, Putāruru and Tokoroa. Applied to an application for additional yield in a single cell, a district-wide capacity test is disproportionate and would make the outcome of an application depend on matters unrelated to the site.	**Retain** AA-R3(1)(b), **amended** so that matter (i) is directed to the availability of infrastructure to service the development proposed and the balance of the Growth Cell in which it is located, rather than to development throughout the three townships.
GRZ-R6(3) and SUB-R5(1)(h) Putāruru Growth Cell 3 (Kennedy Drive)	**Oppose in part**	GRZ-R6(3)(a) sets the maximum for this cell at 155 HUE. SUB-R5(1)(h) sets it at 105 HUE. The two rules are irreconcilable and the land use and subdivision pathways for the same cell therefore produce different outcomes. The submitter raises the inconsistency because it bears on the reliability of the HUE figures generally, and because an unresolved 50 HUE discrepancy in the district's allocation affects the capacity assessment against which the Tirau caps were set.	**Amend** GRZ-R6(3)(a) and SUB-R5(1)(h) so that they specify the same maximum, and confirm which figure is intended.
GRZ-R6 and SUB-R5(1) generally	**Oppose in part**	The caps for the Putāruru cells are expressed by reference to *residential unit sites*, and those for the Tirau and	**Amend** GRZ-R6 and SUB-R5(1) to use a single term consistently across all growth cells and **insert** a definition of

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Provision	Position	Reasons	Decision sought
Defined terms used to express the caps		Tokoroa cells by reference to *dwelling sites*. Neither term is defined in Chapter 3. The distinction matters directly under Plan Change 4, which now provides for duplex units and terraced housing. Whether such units count individually against a cap cannot be determined from the Plan as drafted.	that term in Chapter 3 which confirms how duplex units and terraced housing are counted.

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12.0 CHAPTER 13.1 — GENERAL RESIDENTIAL ZONE

12.1. GRZ-P8 and GRZ-P9 direct that a growth cell is not to be developed until infrastructure capacity sufficient for the whole of that cell is secured, and that each cell is to be serviced so that capacity is available for the scale and density of all development anticipated for the entire cell.

12.2. The policies operate as a precondition on the first consent in a cell, irrespective of the activity status conferred by the rules and irrespective of the scale of the development proposed. The staging matters available at AA-R3(1)(b)(iii) and INF-R7(1)(c) do not cure that, because those matters are engaged only once a policy assessment under GRZ-P8 and GRZ-P9 has been undertaken.

12.3. The submitter does not oppose the principle that development should be serviced and does not seek to displace whole-of-cell infrastructure planning. Development should be able to proceed in stages where the infrastructure necessary to service each stage is secured and the servicing of the balance of the cell is not compromised. That is the approach the rules already contemplated at AA-R3(1)(b)(iii), INF-R7(1)(c) and INF-PR3, and the approach the Development Area Plans themselves assume.

TABLE 6-1: DECISIONS SOUGHT — GENERAL RESIDENTIAL ZONE

Provision	Position	Reasons	Decision sought
GRZ-P8	Oppose in part	Prevents any development of a cell until infrastructure is secured for the whole cell, with no staging pathway. Inefficient and ineffective in achieving GRZ-O3 and INF-O3, and inconsistent with INF-PR3(c), which expressly contemplates agreements under which a developer may implement development earlier than programmed. The policy also applies to development which is within the Household Unit Equivalents allocated to the cell. The allocation is itself the Council's measure of the infrastructure demand the cell generates, so a landowner developing within it is tested twice on the same effect.	**Amend** to: *"Land within the District's Residential Growth Cells (as defined on the planning maps) must not be developed for urban use until the provision of infrastructure to service ~~the land~~* ***the development proposed*** *is secured through private developer agreements or other appropriate legal mechanisms,* ***provided that development which does not exceed the Household Unit Equivalents allocated to the Growth Cell is not required to demonstrate that infrastructure capacity has been secured for the balance of the Growth Cell, and provided further that development may proceed in stages where the infrastructure necessary to service each stage is secured and the staging does not compromise the servicing of the balance of the Growth Cell."***
GRZ-P9	Oppose in part	Conditions development on capacity being available for the full anticipated yield of the entire cell, rather than for the development proposed. Read with GRZ-P8 it operates as a precondition on the first consent in a cell. Whether it can be satisfied depends on the Council's infrastructure programme rather than on any action available to the landowner, with the result that land the Council has zoned General Residential may deliver no development	**Amend** to: *"Each of the District's Residential Growth Cells must be developed and serviced* ***in a manner that ensures*** *~~to ensure~~ sufficient infrastructure capacity ~~is available~~* ***can be provided*** *for the scale and density of all development anticipated for the entire Growth Cell,* ***and that the development of any part of a Growth Cell does not compromise the servicing of the balance of the cell."***

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Provision	Position	Reasons	Decision sought
		capacity until an event outside the landowner's control occurs. A policy directing that whole-of-cell servicing be planned for and not compromised, rather than secured before any development occurs, achieves GRZ-O3 and GRZ-O5 more efficiently and effectively, and leaves the HUE allocation to do the work of managing infrastructure demand which it was designed to do.	
GRZ-O3, GRZ-O5	**Support in part**	The objectives are appropriate. The submitter's concern is with the policies which implement them, not with the objectives themselves.	**Retain**, subject to any consequential amendment arising from the relief sought on GRZ-P8 and GRZ-P9.
GRZ-R2(4) and GRZ-R5(5) Duplex units and terraced housing	**Support**	Providing for duplex and terraced housing at an average net site area of 150m² per residential unit assists housing choice and affordability and the efficient use of live-zoned residential land, consistent with UFD-O1(h), UFD-P6 and UFD-P13. The submitter records that these provisions cannot be given effect within the growth cells while the HUE caps are set on an assumed 450m² average lot size.	**Retain** as notified and **amend** the HUE allocations as sought in the preceding section so that the capacity that these rules enable can be realised.
GRZ-R1(17) Pastoral farming in growth cells	**Support**	Enables the land to continue in productive use pending development, consistent with staged delivery and with FUZ-P1.	**Retain** as notified.

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13.0 CHAPTER 11 — SUBDIVISION

13.1. The submitter supports the general direction of the subdivision provisions, including the reduction of the minimum lot size in the General Residential Zone from 450m² to 300m², which assists the efficient use of residential land and housing choice and affordability.

13.2. Two aspects are opposed: the whole-of-cell Development Concept Plan requirement at SUB-P20, and a circularity in the subdivision pathways at SUB-R2(6) and SUB-R3(6) arising from a requirement to comply with a Development Area Plan which, for several cells and zones, does not exist.

TABLE 7-1: DECISIONS SOUGHT — SUBDIVISION

Provision	Position	Reasons	Decision sought
SUB-R5(1)(a)(i) and (b) Minimum lot size 300m²; maximum 2000m²; average 450m²	**Support**	Assists the efficient use of residential land and housing choice, consistent with UFD-O1(h), UFD-P6 and UFD-P13.	**Retain** as notified.
SUB-P19	**Support**	Requiring connectivity from land adjoining growth cells and future urban zones is appropriate and directly supports the integrated development of the Tirau growth front sought by this submission.	**Retain** as notified.
SUB-P20	**Oppose in part**	SUB-P20 requires a Development Concept Plan for the comprehensive development of the whole cell to be approved before any subdivision may occur within that cell. That is structurally inconsistent with the rules. SUB-INFO-R2 requires a Development Concept Plan to be submitted with a subdivision application, and SUB-R6(1)(jj)(e) and (f) expressly contemplate staged development in which a plan is submitted with an earlier stage and subsequent stages are assessed for consistency with it. The policy should reflect the staged pathway the rules already provide for. The approval requirement is also expressed in unclear terms: the Plan does not identify by whom, by what process, or against what criteria approval is given.	**Amend** SUB-P20 so that it is consistent with SUB-INFO-R2 and SUB-R6(1)(jj), by providing that a Development Concept Plan for the comprehensive and integrated development of the cell may be approved as part of the first subdivision consent for that cell, with subsequent stages assessed for consistency with the approved plan, and by clarifying the approval requirement. Or such other relief as achieves the same outcome.
SUB-R2(6)(b) Subdivision in District Growth Cells must comply with the relevant Development Area Plan in Chapters 17 to 20	**Oppose in part**	Development Area Plans have been prepared for only some cells. Tirau Growth Cell 2 has none. As drafted, subdivision in that cell cannot comply with SUB-R2(6)(b) and therefore defaults to discretionary activity status, which appears to be an unintended consequence of the drafting.	**Amend** SUB-R2(6)(b) to read: *"Subdivision complies with the relevant Development Area Plan in Chapters 17 to 20 of this Plan,* ***where a Development Area Plan has been prepared for that District Growth Cell****; and".* **Amend** the cross-reference to include Chapters 21 and 22 as sought.

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Provision	Position	Reasons	Decision sought
SUB-R3(6)(b) Subdivision in the Future Urban Zone must comply with the relevant Development Area Plan	**Oppose in part**	The same circularity arises, and more acutely. FUZ-M1 requires a Development Area Plan to be prepared **before rezoning occurs**, and a Development Area Plan has been prepared for only one of the six future urban zones. For the remainder there is no plan with which subdivision could comply, so the only available pathway defaults to non-complying and the discretionary pathway the rule purports to create is illusory. This relief is sought in the alternative, in the event that the submitter's land at Parapara Road West remains in the Future Urban Zone.	**Amend** SUB-R3(6)(b) to read: *"Subdivision complies with the relevant Development Area Plan,* ***where a Development Area Plan has been prepared for that future urban zone****; and".*
SUB-P21	**Support in part**	Supported in principle as it applies to future urban land. It should not operate to prevent subdivision which gives effect to an approved Development Area Plan.	**Retain**, subject to the relief sought on SUB-R3(6)(b).
SUB-INFO-R2 Information requirements for Development Concept Plans	**Support in part**	Supported in principle. The information required should be proportionate to the scale and stage of the subdivision proposed, so that a first stage is not required to provide the information appropriate to the whole cell.	**Retain**, subject to any amendment necessary to confirm that information requirements apply to the extent relevant to the proposal.

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14.0 CHAPTER 7.2 — INFRASTRUCTURE

14.1. INF-P2 and INF-P3 replicate GRZ-P8 and GRZ-P9 in the infrastructure chapter. The submitter's position is the same, and the same relief is sought, so that the two chapters remain internally consistent.

TABLE 8-1: DECISIONS SOUGHT — INFRASTRUCTURE

Provision	Position	Reasons	Decision sought
INF-O3	**Support**	Integrated and co-ordinated servicing of growth cells and future urban zones is appropriate.	**Retain** as notified.
INF-P2	**Oppose in part**	Duplicates GRZ-P8. Same reasons.	**Amend** consistently with the relief sought on GRZ-P8 **or delete** as duplicative of GRZ-P8 and GIZ-P4.
INF-P3	**Oppose in part**	Duplicates GRZ-P9. Same reasons.	**Amend** consistently with the relief sought on GRZ-P9 **or delete** as duplicative of GRZ-P9 and GIZ-P5.
INF-R7(1) Matters of discretion where water and wastewater standards are not met	**Support in part**	The matters at INF-R7(1)(b)–(e), and in particular the staging matter at (c), are appropriate and should be available across all District Growth Cells and future urban zones, not only Putāruru Growth Cell 4 and Tokoroa Growth Cell 3. No reason for the restriction is apparent from the notified documents.	**Amend** to extend the application of INF-R7(1) to all District Growth Cells and future urban zones.
INF-P15	**Support in part**	Supported in principle, but incomplete. It requires integrated infrastructure planning to be undertaken before a future urban zone is rezoned, without identifying who undertakes it, on what timeframe, or with what funding commitment. Combined with FUZ-M1, the release of future urban land depends entirely on Council action for which the Plan provides no obligation, trigger or timeframe. This relief is directed at the submitter's alternative position, in the event its land at Parapara Road West remains in the Future Urban Zone.	**Amend** to identify the process by which the integrated infrastructure planning required by the policy is undertaken, by whom, and within what timeframe, and to confirm that the required planning may be undertaken and funded by a landowner and adopted by the Council.
INF-PR2 Private developer agreements	**Support**	Expressly contemplates agreements setting out the circumstances in which a developer may implement development earlier than programmed. This supports the staging relief sought on GRZ-P8 and confirms that a landowner-funded pathway is already contemplated by the Plan.	**Retain** as notified.

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15.0 CHAPTER 14.3 — FUTURE URBAN ZONE

15.1. The submitter supports the introduction of the Future Urban Zone and its objectives and policies. The relief in this section is directed at FUZ-M1, and is sought in the alternative — that is, in the event the submitter's land at Parapara Road West is not live-zoned as sought above and remains in the Future Urban Zone.

TABLE 9-1: DECISIONS SOUGHT — FUTURE URBAN ZONE

Provision	Position	Reasons	Decision sought
FUZ-O1, FUZ-O2, FUZ-O3	Support	Appropriate direction for the management of future urban land.	**Retain** as notified.
FUZ-P1, FUZ-P2, FUZ-P3(d)	Support	Enabling continued rural use pending rezoning is appropriate and supports orderly staging. FUZ-P3(d), requiring a roading pattern which ensures connectivity to adjacent zones, is directly relevant to the integrated development of the Tirau growth front.	**Retain** as notified.
FUZ-M1	Oppose in part	Requires a Development Area Plan before rezoning but does not identify who prepares or adopts it, by what process, against what criteria, or within what timeframe. It records that Development Area Plans will have to be prepared by landowners but provides no corresponding mechanism for their adoption. Read with SUB-R3(6)(b) and INF-P15, the Future Urban Zone becomes a zone from which there is no defined exit. That is the principal reason the submitter seeks live zoning of its land rather than future urban zoning.	**Amend** to confirm that a Development Area Plan may be **prepared by a landowner and adopted by Council**, and to identify the process by which it is adopted, the matters it must address, and the timeframe within which the Council will determine an adoption request. **Consequentially**, if the relief sought on the Planning Maps is granted and the land becomes Tirau Growth Cell 4, **delete** the Tirau Residential Future Urban Zone (Parapara Road West) from the list of future urban zones in FUZ-M1 and from the list of areas in the introduction to Chapter 14.3. The Tirau Industrial Future Urban Zone (State Highway 27) is unaffected by this submission.
FUZ-R2, FUZ-R3, FUZ-R4	Support in part	Not opposed as they apply to land remaining in the Future Urban Zone.	**Retain**, subject to consequential amendment.

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16.0 CHAPTERS 17 TO 20 — DEVELOPMENT AREA PLANS

16.1. The submitter supports the preparation of Development Area Plans and supports their use as the mechanism for guiding the comprehensive and integrated development of each cell. The whole of the land to which Chapters 17 and 18 apply is in the submitter's ownership, as is the whole of the land proposed as Tirau Growth Cell 5, so a single plan and staging sequence can be prepared for each.

TABLE 10-1: DECISIONS SOUGHT — DEVELOPMENT AREA PLANS

Provision	Position	Reasons	Decision sought
Chapter 17 Tirau Growth Cell 1 (Church St) Development Area Plan	**Support in part**	The Development Area Plan is supported and is sought to be retained. The submitter seeks amendments to the indicative connections shown, on the basis that Fairview Street is constrained by surrounding titles and cannot provide the connectivity indicated. The submitter also seeks that the plan be amended consequentially to reflect connectivity to the adjoining land to the west, if that land is identified as Tirau Growth Cell 5 as sought.	**Retain** Chapter 17, **amended** to correct the indicative road and connectivity network, and **amended** consequentially to show connections to the adjoining land to the west.
Chapter 18 Tirau Growth Cell 3 (Parapara Rd east) Development Area Plan	**Support in part**	Supported, subject to the relief sought on the HUE cap and to integration with Tirau Growth Cell 5 as sought.	**Retain**, subject to consequential amendment.
New Chapters 21 and 22 Development Area Plans for Tirau Growth Cells 4 and 5	**Relief sought**	Each new growth cell requires a Development Area Plan to guide its comprehensive and integrated development and to satisfy SUB-R2(6)(b). The plans should be prepared together so that the road, reserve, stormwater and servicing networks of Growth Cells 1, 4 and 5 connect, and so that the interface with Growth Cell 2 to the south of Growth Cell 4 is addressed. The whole of both cells is in the submitter's ownership, so a single integrated plan and staging sequence can be prepared. The submitter is able to provide a draft.	**Insert** new Development Area Plan chapters for **Tirau Growth Cell 4 (Chapter 21)** and **Tirau Growth Cell 5 (Chapter 22)**, in the terms of the masterplan provided at **Attachment B**, and **amend** the cross-references in GRZ-R6, SUB-R2(6)(b) and SUB-R5(1) accordingly.

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17.0 CHAPTER 6 — MATTERS OF STRATEGIC DIRECTION

17.1. The strategic direction provisions are supported. They provide the policy basis for the relief sought on the Planning Maps and on the HUE allocations.

TABLE 11-1: DECISIONS SOUGHT — MATTERS OF STRATEGIC DIRECTION

Provision	Position	Reasons	Decision sought
UFD-O1, UFD-O3, UFD-O5, UFD-O6	Support	Appropriate strategic direction. UFD-O1(c), (g) and (h) and UFD-O3 support the provision of sufficient, well-located and serviceable residential capacity at Tirau, which is what this submission seeks.	**Retain** as notified.
UFD-P1	Support in part	Identifying and zoning land to guide the provision of infrastructure is appropriate, but the policy does not address the sequence in which zoned land is released or the ability of that land to be delivered.	**Amend** to add: ***", and ensure that the sequencing of land release reflects the ability of that land to be serviced and delivered."***
UFD-P2(d)	Support	Avoiding fragmented urban development which does not maximise the efficient use of zoned and serviced land, or coordinate with infrastructure provision, directly supports the inclusion of the intervening land within a single contiguous growth front.	**Retain** as notified.
UFD-P3	Support	Prioritising areas identified for planned and sequenced land release is appropriate. Live zoning with a Development Area Plan, a HUE allocation and restricted discretionary subdivision status is a planned and sequenced release, and achieves the policy more directly than deferral to a further plan change.	**Retain** as notified.
UFD-P6, UFD-P13	Support	Housing choice and affordability, and the efficient use of residential land, are directly served by the intensification provisions Plan Change 4 introduces. The HUE caps, calculated on a superseded density assumption, work against both.	**Retain** as notified, and **amend** the HUE allocations as sought.
UFD-P11	Support	Supports the connectivity outcomes sought across the Tirau growth front.	**Retain** as notified.

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18.0 CHAPTER 7.3 — TRANSPORT

TABLE 12-1: DECISIONS SOUGHT — TRANSPORT

Provision	Position	Reasons	Decision sought
TRAN-O3 (as replaced)	**Support**	Ensuring development does not adversely affect connectivity to future developable land supports the integrated growth front sought by this submission.	**Retain** as notified.
TRAN-P1, TRAN-P9	**Support**	Walking and cycling connectivity between new neighbourhoods and the town centre is appropriate at Tirau, where the growth cells are within walking distance of the Town Centre Zone.	**Retain** as notified.
TRAN-P4	**Support in part**	Supported. Consequential amendment required to reflect the growth cell boundaries sought on the Planning Maps.	**Retain**, subject to consequential amendment.

19.0 CHAPTER 8.3 — NATURAL HAZARDS AND APP4 INFORMATION REQUIREMENTS

19.1. A risk-based approach to natural hazards consistent with the National Policy Statement for Natural Hazard Decision-making 2025 is supported. The assessment and information required should be proportionate to the scale and stage of the subdivision or development proposed and should not operate as a barrier to staged delivery.

TABLE 13-1: DECISIONS SOUGHT — NATURAL HAZARDS AND INFORMATION REQUIREMENTS

Provision	Position	Reasons	Decision sought
NH-P5 Liquefaction assessment	**Support in part**	Supported in principle, on the basis that the policy already requires assessment proportionate to the subdivision or development proposed.	**Retain**, subject to any amendment necessary to confirm proportionality.
NH-R2 Flood floor levels and river setbacks in the District Growth Cells and future urban zones	**Support in part**	Supported in principle. The submitter records that localised flooding has been identified along the Parapara Road frontage and through the central part of Growth Cell 3, and that the extent of any high-risk flood zone affects the yield able to be achieved. That is a further reason why yield should be determined at the time of application rather than fixed now.	**Retain**, subject to the relief sought on the HUE allocations.
SUB-O7, GRZ-O6	**Support in part**	Supported in principle.	**Retain**, subject to any consequential amendment.

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Provision	Position	Reasons	Decision sought
APP4 Information Requirements	Support in part	Supported in principle. The information required should be proportionate to the scale, stage and location of the proposal and should be able to be provided progressively as development is staged.	Retain, subject to amendment to confirm that information is required to the extent relevant to the scale and stage of the proposal.

20.0 GENERAL RELIEF AND HEARING

20.1. Further, other, alternative or consequential relief as may be necessary or appropriate to give effect to the decisions sought in this submission, including consequential amendments to the Planning Maps, objectives, policies, rules, standards, matters of discretion and control, assessment criteria, definitions, Development Area Plans, appendices and explanatory text of the Plan.

20.2. The submitter **wishes to be heard** in support of this submission.

20.3. If others make a similar submission, the submitter **would consider presenting a joint case** with them at any hearing.

Signature: _____

Date: 2 September 2026

Sarah Duffy, Principal Planner, Maven Matamata Limited
Agent for and on behalf of Momona Land Limited

21.0 ATTACHMENT

Attachment A - Urban Design memo (Richard Knott)

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