



# Waipā District Plan Plan Change 36 Submission Form

Form 5

Clause 6 of the First Schedule to the Resource Management Act 1991

Send to: Waipā District Council, Private Bag 2402, Te Awamutu 3840

Phone: 0800 924 723 | Online: [www.waipadc.govt.nz/planchanges](http://www.waipadc.govt.nz/planchanges) | Email: [districtplan@waipadc.govt.nz](mailto:districtplan@waipadc.govt.nz)

Please attach additional sheets if there is not enough space for your submissions. If you do not wish to use this form, please ensure that the same information required by this form is covered in your submission.

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|------------------|-------------|
| Date received    | 02 JUL 2026 |
| Document ref:    | BY: Sham    |

**Note:** You must fill in **ALL** sections of this form.  
Submissions close **5pm Thursday, 02 July 2026**.

| 1. Submitter details                                               |                                            |
|--------------------------------------------------------------------|--------------------------------------------|
| Full name of submitter:                                            | John Darragh & Ross Dunn as co-submitters. |
| Contact name if different from above:                              |                                            |
| Contact phone number(s)                                            |                                            |
| Email address:                                                     |                                            |
| Address for service:<br>(required if no email address is provided) |                                            |

We will serve all formal documents electronically via the email address provided above. Where there is no email address provided the documents will be posted to the above address.

| 2. This is a submission on the following proposed plan change to the Waipā District Plan |  |
|------------------------------------------------------------------------------------------|--|
| Proposed Private Plan Change 36 – Ōhaupō Large Lot Residential Extension                 |  |

| 3. Trade competition |                                              |                                                                                                                                                                                           |
|----------------------|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Select one           | <input type="radio"/> I could                | gain an advantage in trade competition through this submission.                                                                                                                           |
|                      | <input checked="" type="radio"/> I could not |                                                                                                                                                                                           |
| Select one           | <input checked="" type="radio"/> I am        | directly affected by an effect of the subject matter that –<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition |
|                      | <input type="radio"/> I am not               |                                                                                                                                                                                           |

| 4. Attendance at Council hearing                                                                       |                                       |                                                                                        |
|--------------------------------------------------------------------------------------------------------|---------------------------------------|----------------------------------------------------------------------------------------|
| Select one                                                                                             | <input checked="" type="radio"/> I do | wish to be heard (attend and speak at the Council hearing) in support of my submission |
|                                                                                                        | <input type="radio"/> I do not        |                                                                                        |
| If others make a similar submission, I will consider presenting a joint case with them at the hearing. |                                       | <input checked="" type="radio"/> Yes<br><input type="radio"/> No                       |

5. The specific provisions of the plan change my submission relates to are: (give details)

|            |                                  |                   |                                                                   |
|------------|----------------------------------|-------------------|-------------------------------------------------------------------|
| Select one | <input type="radio"/>            | I SUPPORT         | - consultation & landowner statement regarding growth cell timing |
|            | <input type="radio"/>            | I SUPPORT IN PART |                                                                   |
|            | <input checked="" type="radio"/> | I OPPOSE          |                                                                   |

6. My submission is: (please include the reasons for your view)

See attached document.

7. I seek the following decision/s from Council: (give precise details – e.g. what you would like the wording of a specific provision (or map) to be changed to)

See attached document.

8. Signature of submitter (note: a signature is not required if you make your submission by electronic means, however please type your name below)

Signature of submitter:  
(or person authorised to  
sign on behalf of submitter)

G. J. Danagh

*[Signature]*

Dated 1-7-26

## Submission on Private Plan Change 36

### Introduction

This submission is made by John Darragh and Ross Dunn in respect of Private Plan Change 36 ("PPC36") - Ohaupo Large Lot Residential Extension.

We **oppose** PPC36.

We **wish to be heard** in support of this submission.

### Background

We are landowners within the Ohaupo O4 Growth Cell.

The O4 Growth Cell has already been identified through the Future Proof process as an appropriate location for future large lot residential development. In 2022, the timing for development of the O3 and O4 Growth Cells was brought forward following consideration by Future Proof, recognising the need for additional residential land and the willingness of landowners to progress development.

We have been actively progressing the O4 Growth Cell and expect to lodge a joint private plan change and subdivision consent application during this year.

### Reasons for Submission

#### ***The application misrepresents the position of O4 landowners***

A significant concern is the description of consultation contained within the PPC36 application.

The application states that landowners within the existing Ohaupo Growth Cells did not intend to develop or subdivide in the short to medium term. It also records that Council representatives supported the applicant progressing PPC36 following discussions about the intentions of those landowners.

That does not accurately reflect our discussions with the applicant.

During consultation we made it clear that:

- we were actively progressing the O4 Growth Cell;
- we intended to continue progressing rezoning and subdivision; and
- we did not support rezoning land outside the identified growth cells ahead of land already identified for future residential growth.

At no stage did we advise that we had no intention of progressing development within the short, medium or long term.

Accordingly, we do not consider the consultation outcomes described in the application accurately represent our position.

***The O4 Growth Cell is actively progressing***

Contrary to the impression created by the application, substantial work has already been undertaken to advance development of the O4 Growth Cell.

This work includes:

- preparation of subdivision layouts and development options;
- consultation with NZ Transport Agency Waka Kotahi;
- preparation of an Integrated Transport Assessment;
- consultation with adjoining landowners;
- preparation of an ecological assessment;
- preliminary pedestrian access investigations; and
- consultation with other affected parties.

These are not preliminary discussions only. They are workstreams that demonstrate a clear and ongoing commitment to progressing development within the identified growth area.

***PPC36 undermines the planned sequencing of growth***

The O3 and O4 Growth Cells have already been identified through strategic planning processes as appropriate locations for future residential growth.

Those areas have been assessed through Future Proof and incorporated into the planned growth strategy for Ohaupo. PPC36, by contrast, seeks to establish a new area of residential development outside that planned framework.

In our view, Council should give priority to land that has already been identified for growth and where landowners are actively progressing development.

Approving PPC36 ahead of those areas would undermine the strategic sequencing of residential growth established through earlier planning processes.

***There is no demonstrated need to bypass the identified growth cells***

We accept there is demand for additional residential sections within Ohaupo.

However, the existence of demand does not justify establishing an additional unplanned growth area where identified growth cells are available and are being actively progressed to help meet that demand.

The O4 Growth Cell alone is expected to provide approximately 31 additional large lot residential sections, which is a material contribution to Ohaupo's large lot residential supply.

Before Council considers rezoning additional rural land outside the planned growth framework, it should first allow development within the existing identified growth cells to proceed.

**The application does not provide detailed evidence of demand**

The PPC36 application relies on general statements about demand and land supply in Ohaupo. However, it does not appear to provide detailed evidence showing that demand is so urgent or significant that Council should rezone additional rural land outside the identified growth cells.

Before approving a new growth area outside the existing framework, we consider the applicant should provide clearer evidence of demand, including:

- how many additional sections are actually needed in Ohaupo in the short and medium term;
- recent section sales information for Ohaupo;
- how quickly previous sections in Ohaupo have sold;
- how many suitable sections are currently available;
- whether demand can be met through the existing O3 and O4 Growth Cells; and
- why PPC36 land should be rezoned before land already identified for future growth.

Without that information, we do not consider it is enough to rely on general statements about demand. Any limited demand that does exist should first be met through the identified growth cells, including O4.

***The planning justification for PPC36 is incomplete***

The application relies, in part, on the proposition that existing growth cells are unlikely to become available within an appropriate timeframe.

That proposition is not correct in relation to the O4 Growth Cell.

Because the O4 landowners are actively progressing development, the justification advanced for rezoning additional land outside the planned growth areas is significantly weakened.

***Failure to demonstrate compliance with the National Policy Statement for Highly Productive Land***

PPC36 proposes the rezoning of land that includes Highly Productive Land. However, the application does not demonstrate that the proposal satisfies the requirements of Clause 3.6 of the National Policy Statement for Highly Productive Land (NPS-HPL).

In particular, the application does not demonstrate that the extent of land proposed for rezoning is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment, as required by Clause 3.6(5).

The application contains no assessment demonstrating:

- why the full extent of the land proposed for rezoning is required;
- whether a smaller area could achieve the same planning outcome;
- whether an alternative zoning layout could reduce the amount of Highly Productive Land affected; or
- how the proposed rezoning represents the minimum land area necessary to accommodate future development.

The application also does not provide the expert/technical information necessary to support these conclusions. In particular, it does not include:

- an economic assessment demonstrating that additional development capacity is required in this location;
- a land productivity assessment evaluating the productive value of the land proposed for rezoning;
- site-specific Land Use Capability mapping confirming the extent and quality of the Highly Productive Land affected; or
- an assessment of alternative development options that would avoid or reduce the loss of Highly Productive Land.

Instead, the application concludes that the loss of Highly Productive Land is negligible because it represents only a small proportion of the district's overall Highly Productive Land resource and states that the LUC 2 land is too small to support economic rural production. Those conclusions are not supported by any land productivity assessment, agricultural economic analysis, or site-specific evidence.

The NPS-HPL does not assess the loss of Highly Productive Land by reference to district-wide percentages. Rather, it requires consideration of whether the rezoning is necessary, whether reasonably practicable alternatives have been considered, and whether the spatial extent of the proposed urban zone is the minimum necessary. Those matters have not been adequately addressed in the application.

Accordingly, the application does not provide an adequate evidential basis for Council to conclude that the proposal is consistent with the requirements of the NPS-HPL.

### **Conclusion**

For the reasons outlined above, we consider PPC36 should be declined.

In particular:

- the application inaccurately represents the outcome of consultation with the O4 landowners;
- the O4 Growth Cell is actively progressing toward rezoning and subdivision;
- PPC36 would undermine the planned sequencing of residential growth for Ohaupo; and
- there is insufficient justification for rezoning land outside the identified growth framework while existing growth areas remain available and capable of contributing to demand;
- the application has not demonstrated compliance with the National Policy Statement for Highly Productive Land, including the requirement to demonstrate that the extent of Highly Productive Land proposed for rezoning is the minimum necessary to provide the required development capacity; and
- the application does not include sufficient evidence to justify the loss of Highly Productive Land, including site-specific land capability information or an assessment of alternative options.

### **Decision Sought**

We seek that Waipa District Council:

1. Decline Private Plan Change 36 in its entirety.
2. Alternatively, if Council is not prepared to decline PPC36, we request that further consideration of the application be deferred until the O4 Growth Cell has been progressed to the point where Council can properly assess whether additional residential land outside the identified growth framework is required.