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3 March 2014

Selwyn District Council
Attention: Craig Friedel, Strategy and Policy Planner
PO Box 90
Rolleston 7643
submissions@selwyn.govt.nz

380221.40

Dear Craig,

Submission on the Rural Residential Strategy 2013 - Consultation Draft

Please find attached on behalf of the Ministry of Education a submission on the Rural Residential Strategy 2013 - Consultation Draft.

If you have any questions please feel free to contact me on (03) 353 5531 or via email:
jennifer.orange@opus.co.nz

Regards

Jennifer Orange
Environmental Consultant
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**Submission on Council's Rural Residential Strategy 2013 –
Consultation Draft**

To: Selwyn District Council
Attention: Craig Friedel, Strategy and Policy Planner
PO Box 90
Rolleston 7643
FAX: 03-347-2799

Full name of submitter: Ministry of Education
Southern Region
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CHRISTCHURCH
(Please note address for service)

The Ministry of Education (“the Ministry”) wishes to make a submission on the Selwyn District Council’s Rural Residential Strategy 2013 - Consultation Draft (RRS13).

The Ministry understands that the Canterbury Land Use Recovery Plan (LURP) directs the Council to ensure that any rural residential development accords with an adopted Rural Residential Development Strategy.

The Ministry acknowledges that the overall intent of the RRS13 is to provide guidance and policy direction on how best to manage rural residential development within the area of Selwyn District that is subject to the LURP. The RRS13 provides an initial policy position and guiding principles on the optimal form, function and character of rural residential development and where it is best located.

1. The specific provisions of the RRS13 that the Ministry submission relates to are:

- Guiding Principles and Outcomes (Chapter 5)
- Rural Residential Area Assessment (Chapter 6)
- Rural Residential Location Criteria (Appendix 1)

2. The Ministry’s submission is:

- i. The Ministry supports in part the Rural Residential Strategy. The reasons for the Ministry’s submission are:

Strategic Approach

- ii. The Ministry is a key stakeholder in the community and exercises its role in the education sector to facilitate achievement of the government's education goals.
- iii. The Ministry of Education's post-earthquake 'Education Renewal Plan' promotes the understanding that enhancing education is central to the development and maintenance of human and social capital in any community. Quality education services are an important support to children's social development, enhancing overall community wellbeing and social cohesion.
- iv. The 'Urban Development Strategy and Action Plan' (UDS), was developed prior to the Canterbury earthquakes, and continues to be a relevant document providing strategic direction to manage future growth. The UDS highlighted the need to manage rural residential activities tightly, due to its potential to undermine consolidated urban forms. Education is referred to within the UDS as important for providing people with knowledge and skills that enable them to contribute and be involved in the community socially, culturally and economically. Education can be considered as playing a significant role in the strategic long term recovery and future growth of the Greater Christchurch region.

Priorities of the Ministry of Education

- v. In order for people to gain knowledge and skills so they can participate fully in the community, they need adequate access to educational facilities.
- vi. The Ministry needs to deliver quality education services in a cost-effective manner that meets changing demands in a modern education environment. This requires planning for and investing in facilities based on a network framework that provides integrated and innovative resources to fulfil education demands. Therefore, appropriate location of these facilities for the community is of critical importance for the delivery of educational resources.

Comments on Guiding Principles and Outcomes

- vii. The Ministry is supportive in principle of the overall intent and methodology the Council has used to develop an initial policy position and guiding principles in the RRS13.

Rural Residential Development Typologies

- viii. The Ministry supports the assessment of development typologies (paragraphs 5.2 - 5.21 of the RRS13) which concludes that a peri-urban form of rural residential development is most sustainable within the area of the district that is subject to the LURP.
- ix. New rural residential development will increase in the number of households who will need access to educational facilities in the Selwyn District. It is important that schools are reasonably convenient to communities. Locating new rural residential development in close proximity to existing settlements will allow communities to access existing schools and supports the provision of consolidated and economically viable education services.

Infrastructure Servicing

- x. In line with the LURP, the RRS13 requires rural residential development areas to be located so that they can be economically provided with reticulated sewer and water supply integrated with a publicly owned system, and appropriate stormwater treatment and disposal.
- xi. Schools in rural areas of Canterbury often source their own drinking water through onsite wells. Therefore, the threat of water shortage and the contamination of drinking water is a concern to the Ministry.
- xii. The Ministry supports the principles and criteria in the RRS13 that require rural residential development areas be located where they can be provided with reticulated sewer and water supply systems, which will ensure groundwater supplies for schools are protected.

Market Trends and Demands

- xiii. The LURP prioritises the consolidation of urban development over rural residential development, and the RRS13 facilitates this by proactively managing growth to achieve more sustainable outcomes and efficiency gains.
- xiv. The Ministry strongly supports this approach of consolidated urban development, which will ensure that the Ministry's school network is not geographically stretched for existing and future education demands, and that the Ministry is able to deliver education in a cost effective manner.

Comments on Rural Residential Area Assessment

- xv. The Ministry acknowledges five preliminary rural residential areas have been identified in the RRS13 near Rolleston, West Melton, Prebbleton, and Lincoln, which could support approximately 335 households.
- xvi. The Ministry supports the approach of the RRS13 to identify preliminary rural residential areas for future growth. This provides direction to the Ministry as to the scale and location of future population growth. Understanding patterns of population growth, and anticipating demand on the education network is integral to the effective management of resources. This will allow the Ministry to undertake strategic planning of the education network and plan for future growth in an appropriate manner.

Comments on Rural Residential Location Criteria

- xvii. The Ministry requests the Rural Residential Location Criteria set out in Appendix 1 of the RRS13 are amended. The criteria relating to strategic infrastructure includes reference to some but not all schools near rural residential growth areas, for example:

Rolleston Environs Study Area Criteria Strategic Infrastructure

“Avoid locations that may undermine the efficient operation of the strategic infrastructure referenced in the District Planning Maps

and the associated Study Area Maps contained in APPENDIX 2 – Map 4):

*NZ Defence Force Burnham Military Camp (DE1), Rolleston Prison (MC1), Pines Wastewater Treatment Plant and East Selwyn Sewer Scheme (D403 & D411), Rolleston Resource Recovery Park (D412), I-Zone Industrial Park, Weedons Cemetery (D178), Weedons Domain (D203), **Weedons Primary School (ME25)**, McClelland Road reserve (D125), Council water wells on Wards Road (D92), SH1 four-laning and CSM2, SIMTL, Christchurch International Airport Noise Contour, Youth Justice Residential Centre (MS1) and Transpower high voltage transmission lines”*

This criteria does not include reference to Rolleston School (ME10) or Clearview School (ME11), which are also located near to the preliminary rural residential area, and may be affected by any development in this area.

- i. The Ministry request that the following designated schools be included in the criteria for:
 - Rolleston study area: Rolleston Primary School (ME10) and Clearview School (ME11)
 - Lincoln study area: Lincoln Primary and Lincoln High School (ME8), Springston School (ME14).
 - Prebbleton study area: Prebbleton School (ME 9)
 - West Melton study area: West Melton School (ME16)
 - Tai Tapu study area: Tai Tapu School (ME15)
 - Springston study area: Springston School (ME14) and Lincoln Primary and Lincoln High School (ME 8)

Summary

- xviii. The Ministry welcomes the opportunity to make a submission and comment on the RRS13. The Ministry is supportive in principle of the overall intent and methodology the Council has used to develop an initial policy position and guiding principles in the RRS13.
- xix. The Ministry requests that minor changes to the rural residential location criteria are made to ensure that impact of any future rural residential development on all schools nearby is considered.
- xx. Please do not hesitate to contact the Ministry should you need further information or clarification on any points raised in the Ministry’s submission.

3. The Ministry do wish to be heard in support of their submission.

4. If others make a similar submission the Ministry will consider presenting a joint case with them at the hearing.

Regards



Jennifer Orange
Environmental Consultant
Opus International Consultants

As duly authorised agent for and on
behalf of the Minister of Education

Date: 3rd March 2014

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