



FORM 5

Submission on publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991

To: Selwyn District Council

Name of submitter: Ministry of Education ('the Ministry')

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This is a submission on the Proposed Plan Change 60 (Private) - Rezone 17.9 hectares of Living Zone 2A to Living Zone 1, Kirwee to the Selwyn District Plan ('the Proposed Plan Change').

The specific parts of the proposal that the Ministry of Education's submission relates to are:

Kirwee Central Properties Limited have lodged a private plan change request with Selwyn District Council. The Proposed Plan Change seeks to rezone approximately 17.9ha of land from Living 2A to Living 1. The Proposed Plan Change does not seek to introduce any new objectives, policies or rules into the District Plan, rather it proposes to utilise the existing Living 1 zone rules to facilitate development of residential sections with an average minimum allotment size of 800 m². If approved, the Proposed Plan Change results in the potential for 164 residential allotments, which is an additional 118 lots above the 46 lots that already have subdivision consent.

The Proposed Plan Change is located in the Kirwee township, south of Hoskyns Road, north of State Highway 73 (West Coast Road), and east of School Lane and Water Place. Kirwee Model School is located on School Lane adjoining the Proposed Plan Change area (see Figure 1 below). Kirwee Model School is operated by the Ministry catering for pupils from Year 1 to 6. The school role is approximately 150 students.

The Ministry has identified potential issues arising from the Proposed Plan Change including impacts on school facilities that may arise from significant residential development; the potential traffic effects around School Lane, which may impact on the safety of students walking and cycling to and from school; and the potential effects of onsite wastewater disposal. The Ministry has not been consulted on the Proposed Plan Change.



Figure 1: Proposed Plan Change 60 site and Kirwee Model School location (source: Canterbury Maps).

Background:

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry's overall purpose is "Lifting aspiration and raising education achievement for every New Zealander". Amongst other matters, the Ministry has responsibility for managing all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a key stakeholder in terms of activities that may impact on educational facilities and assets in the Selwyn District.

The Ministry of Education's submission is:

Under the Resource Management Act 1991, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. In respect of this Proposed Plan Change, the Ministry has identified the following issues:

Impact on school facilities

The Proposed Plan Change will potentially result in a relatively significant increase in the population of Kirwee. This is likely to result in an increase of school age children that may attend Kirwee Model School. As a key stakeholder in the provision of community infrastructure, the Ministry would strongly recommend it have the opportunity to discuss this Proposed Plan Change with the Council and the developer to ensure provision for this growth is considered appropriately.

Traffic

The transportation assessment provided as part of the Proposed Plan Change shows that traffic volumes on School Lane will rise from 440 movements per day to 475 movements per day and in peak hour rise from 120 movements to 125 movements. The Proposed Plan Change also indicates there will be a pedestrian and cycle access via School Lane to Kirwee Model School. The Ministry supports the pedestrian and cycle access as it assists in facilitating active transport to the school and welcomes the opportunity to discuss the pedestrian and cycle access further to ensure a safe environment for pupils to walk and cycle to and from the School.

The transport assessment concludes that the traffic generated by the development can be accommodated on the adjacent roading network without capacity or efficiency issues arising. Generally, the Ministry concurs with this, but wishes to ensure the safety of students walking and cycling to and from school and dropped off and picked up are not affected.

On site wastewater disposal

The application advises that Kirwee has a reticulated town ground water supply available for community drinking water supply. The application states that there is no existing wastewater reticulated system in Kirwee and no wastewater network servicing the application site. The existing dwellings in the Kirwee township are connected to individual onsite wastewater. The proposed disposal method for Proposed Plan Change is an individual onsite wastewater with each allotment connecting to an individual system for treatment and disposal of wastewater to land. The application notes that there is a risk of contamination to the water supply from septic tanks if it is pumped at high rates. Kirwee Model School has a potable water supply from the community drinking water supply and discharges waste via a septic tank.

The Ministry is concerned about the potential adverse effects, including cumulative effects, arising from the onsite disposal proposed by the Proposed Plan Change, particularly as it relates to the school's drinking supply and effluent disposal system in terms of public health and the amenity of the school in terms of such matters as odour.

The Ministry of Education seeks the following decision from the consent authority:

The Ministry is neutral on the Proposed Plan Change at this stage and requires the following matters to be addressed;

- The Ministry of Education are able to engage with the Council and the developer in respect of potential effects on the capacity and growth of Kirwee Model School

- The Ministry of Education is consulted on the potential traffic effects including the proposed pedestrian and cycle access on Kirwee Model School
- The applicant establishes that there are no adverse and cumulative effects on the Kirwee Model School in respect of the proposed onsite discharge of wastewater.

The Ministry to be heard in support of their submission.



Morgan Fallowfield
Planner- Beca Ltd

(Consultant to the Ministry of Education)

Date: 19 February 2020