



18 November 2021

Hearing Commissioners
Selwyn District Council
PO Box 90
Rolleston 7643

Ministry of Education Letter to be tabled at the Hearing of Private Plan Change 69 to the Selwyn District Plan:

Attention: Emma Robertson

The Ministry of Education (the Ministry) lodged a submission on Proposed Private Plan Change 69 (PPC69) as well as a further submission (submitter PC69-0243). The Ministry will not attend the Hearing on PPC69 scheduled to commence on Monday the 22nd of November 2021, and instead requests that this letter be tabled for the Hearing Panel's consideration.

The Ministry submitted in relation to school capacity, traffic effects and connectivity, active transport infrastructure, contaminated land and services and infrastructure. In addition, the Ministry submitted that the potential inconsistencies between Policy 8 of the National Policy Statement for Urban Development (NPS-UD) and the Canterbury Regional Policy Statement need to be satisfactorily resolved particularly as they relate to development capacity and well-functioning urban environments. In the further submission, the Ministry requested that requests for land to be included as part of PPC69 (submitter PC69-0191) should be requested through a separate private plan change process, unless further technical information to support the request could be provided.

Since our original submission the Ministry have been working with the applicant and their agent to address the submission points. The Ministry have reviewed the Section 42A report dated 28 October 2021 and the evidence submitted on behalf of the applicant dated 4 November 2021, and note the following key matters to be resolved:

- Provision for Educational Facilities

In paragraphs 26.4 and 74, and Attachment 1 of his planning evidence, Mr Phillips has recommended changes to the Outline Development Plan (ODP) text to provide for new educational facilities in the PPC69 site if required. The Ministry supports these changes to account for a new educational facility within the site if required in the future.

In the s42A officers report for Plan Change 73 in Rolleston, it was recommended that an assessment matter be included in Rule 12.1.4.76 of the Operative Selwyn District Plan (OSDP) to account for schools as part of a subdivision application and to assess the impact of the rezoning on the capacity of local schools and identify where it is appropriate to provide for additional capacity within the site. The Ministry supported this recommendation (with some amendments to the wording of the provision), and would support a similar provision in the case of PPC69 as outlined below (with additions to the ODSP noted in red):

12.1 SUBDIVISION — GENERAL

12.1.4 Matters over which the Council has restricted the exercise of its discretion:

Lincoln

12.1.4.106 Whether, following consultation with the Ministry for Education, any land is required to be provided for education purposes within Outline Development Plan Area 9.



The Ministry also requests additional wording to Policy B4.3.63 of the OSDP as noted below (with additions noted in red), to reinforce the potential provision for education facilities in the PPC69 site.

B4 Growth of Townships

Policy B4.3.63

Ensure that development within each of the Outline Development Plan areas identified on the Planning Maps and Appendices within Lincoln addresses the specific matters relevant to each ODP Area number listed below:

...

Outline Development Plan Area 9

• Potential provision of educational facilities;

The Ministry has discussed these amendments to the OSDP with the applicant and their agent who noted that they are generally in acceptance of the proposal.

- Connectivity and Transport

The Ministry understands the limitations noted in the s42A officers report and evidence of Mr Phillips relating to connectivity from the PPC69 site, north to the existing Lincoln township. However, the Ministry notes the conclusions drawn in paragraph 296 (g) of the s42A officers report that the proposed roading network in the ODP has limited connectivity with the existing Lincoln network. It is noted that the applicant proposes to amend the ODP through their evidence (refer Attachment 1 of Mr Phillips evidence), however the Ministry still wishes to require that any development is well connected to the existing school network to ensure accessible travel options for staff and students, to and from school.

The Ministry also supports cycling and pedestrian infrastructure noted in the applicant's proposed amendments in the ODP through their evidence (Attachment 1 of Mr Phillips' evidence), across, as well as to and from, the PPC69 site, as they assist in facilitating active travel modes for staff and students travelling to and from schools.

The Ministry also notes proposed requirements for the general transport network and intersection improvements before development can be enabled on the plan change site, outlined within the evidence of Mr Phillips (Attachment 1 of Mr Phillips' evidence). The Ministry notes that the s42A report indicated that the transport effects of development are unclear, and therefore the Hearing Commissioner needs to be satisfied that any measures and necessary improvements will support the safe operation of the transport network including the safe travel of staff and students to and from school, in the Lincoln area.

- Rezoning of Additional Land

It appears that the s42A reporting officer has not addressed the submission of 'Manmeet Singh' (submitter PC69-0191) to rezone neighbouring land which did not form part of the original plan change. It appears that the submitter, from their evidence, accepts that the submission to rezone their site is 'not on the plan change'. As a consequence the Ministry has not considered the submission further.

Council has an obligation under the NPS-UD to ensure sufficient additional infrastructure (which includes schools) is provided in urban growth and development (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). Therefore, schools and educational facilities need to be enabled in urban growth and developments such as PPC69.

If PPC69 is accepted, the Ministry requests that the above matters are included and considered to enable them to better manage its responsibilities as an education provider. If the above matters are adopted, then the Ministry considers its submission points in relation to PPC69, are appropriately addressed.

Should you have any queries please contact the undersigned.



Hugh Loughnan

Beca Ltd (Planning Consultant to the Ministry of Education)

P: +64 968 4371

E: Hugh.Loughnan@beca.com