



**Further submission in support of, or opposition to, submission on publicly notified proposed plan change under Clause 8 of Schedule 1, Resource Management Act 1991**

To: Selwyn District Council (SDC)

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

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**This is a further submission on the proposed Private Plan Change 69 (PPC69) on behalf of the Ministry of Education.**

**The Ministry of Education:**

- is representing a relevant aspect of the public interest in that the Ministry is responsible and manages public education; and
- has an interest in the proposal that is greater than the interest the general public has, as the Ministry owns and operates land near to the plan change area

**The Ministry of Education make a further submission on:**

Submitter	Address
PC69-0191 Manmeet Singh	C/-Aston Consultants LTd PO Box 1435 Christchurch 8140  Submission in reference to: <i>Lot 1 DP 371976</i> <i>Lot 2 DP 371976</i> <i>Lot 3 DP 371976</i> <i>Lot 4 DP 371976</i> <i>Lot 5 DP 371976</i> <i>Lot 6 DP 371976</i> <i>Lot 120 DP 329124</i> <i>Lot 121 DP 329124</i>

The particular parts of these submissions that the Ministry submit on is the requests for inclusion of multiple parcels of land at the end of Allendale Lane as part of PPC69. The land parcels are listed in Table above.

**The reasons for the Ministry's submission and the decision sought from the consent authority:**

- Planned areas of growth

All of the aforementioned land parcels are outside of the Projected Infrastructure Boundary identified in (Map A) in the Canterbury Regional Policy Statement (CRPS). Therefore, rezoning these would be inconsistent with several provisions of the CRPS as outlined below;

- Objective 6.2.1 of the CRPS states that:  
*"Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that..."*  
3. *avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;*
- Objective 6.2.2 outlines that:  
*"urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas"*
- Policy 6.3.1 outlines that:  
*"In relation to recovery and rebuilding for Greater Christchurch:..."*  
4. *ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS"*

It is also noted rezoning these areas is inconsistent with the recent Greater Christchurch Partnership Our Space document which the Ministry generally supported (and reflects Map A of the CRPS).

The Ministry's school network planning and investment in Lincoln in recent years has been guided by Council advice on future development. This advice has been shaped by the Projected Infrastructure Boundary and Outline Development Plans and the current school network has generally not been designed to accommodate any development outside of these areas.

If these parcels of land are included in PPC69, the Ministry will need to review its education networks in Lincoln, particularly the Year 1-8 state education network. This will likely include changes to enrolment scheme home zone boundaries to manage demand across schools and potentially the acquisition of land for the construction of additional education facilities in the south part of Lincoln. As such, this plan change will have a significantly greater impact on school capacity than other recent private plan changes which have occurred within the Projected Infrastructure Boundary.

While the Ministry is aware of the national direction of the National Policy Statement on Urban Development (NPS-UD) in relation to unanticipated growth, it is noted that if these parcels of land are included in PPC69 and PPC69 is approved, it may set a precedent of development outside of existing planned areas in the Selwyn District and Canterbury, which makes planning for school capacity and networks increasingly difficult. Furthermore, the requirement of Policy 8 of the NPS-UD which outlines that local authorities are responsive to plan changes that are unanticipated by RMA planning documents if they would add significantly to development capacity and contribute to well functioning urban environments, should also be balanced against other parts of the NPS-UD. Other requirements for Councils is that they ensure sufficient additional infrastructure (which includes schools) is provided.

- Opportunity for assessment

As there are multiple land parcels requesting to be part of PPC69, there is a lack of opportunity to complete a detailed assessment of each parcel of land to assess the effects on schools in the area. Each land parcel requesting to be part of PPC69 is likely to have different effects in terms of matters such as transport, amenity, contaminated land, infrastructure services, school capacity and more. The requests are also not supported by specialist assessments and therefore does not allow the Ministry to fully understand the potential effects of the submission. Therefore, if these land parcels are included as part of PPC69, there may be a large amount of effects on schools that are not captured or not able to be properly assessed.

As such the Ministry seeks that any applicant lodges a private plan change as part of the normal RMA process and not as part of PPC69, unless specific provision is given to the Ministry to assess the plan change request that includes additional land parcels.

**The Ministry's further submission is:**

That if the aforementioned land parcels are considered as part of PPC69, that SDC ensures the potential inconsistencies between Policy 8 of the NPS-UD and the CRPS are satisfactorily resolved as it relates to development capacity and well-functioning urban environments.

That the parcels of land at the end of Allendale Lane and listed in the table above that are requested to be included as part of PPC69, are lodged through the general private plan change process, unless specific provision is given to the Ministry to assess the effect of each land parcel requesting to be included as part of PPC69, in sufficient detail.

**The Ministry wishes to be heard in support of its further submission.**

The key Ministry contact person is Stuart Graham. Contact details for Stuart are:

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**Hugh Loughnan**  
**Planner – Beca Ltd**  
**(Consultant to the Ministry of Education)**

*(Signature of person authorised to sign on behalf of the Ministry of Education)*

**Date:** 08/09/2021