



27 September 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 73 to the Selwyn District Plan:

Attention: Emma Robertson

The Ministry of Education (the Ministry) lodged a submission on Proposed Private Plan Change 73 (PPC73) as well as a further submission (submitter PC73-0048). The Ministry will not attend the Hearing on PPC73 scheduled to commence on Monday the 28th of September 2021, and instead requests that this letter be tabled for the Hearing Panel's consideration.

The Ministry submitted in relation to traffic effects, active transport infrastructure, amenity values, contaminated land and school capacity issues. 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 are satisfactorily resolved particularly as it relates 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 PPC73 should be lodged through the general private plan change process, unless specific provision is given to the Ministry to assess the effects of each addition in sufficient detail.

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 6 September and the evidence submitted on behalf of the applicant dated 14 September, and note the following:

- Interface Treatment between West Rolleston Primary School and the PCC73 site

In paragraphs 22.4 (d) and 34, and Attachment 3 of the applicant's planning evidence by Mr Jeremy Phillips, there are recommended changes to the map and text of the Holmes Block Outline Development Plan (ODP) to account for interface treatment between West Rolleston Primary School and the proposed commercial centre. The Ministry supports these changes. It is noted that in paragraph 96 and Appendix 1 of the s42a report, the officer has recommended similar wording to the ODP. However, the Ministry prefers the wording and placement of Mr Phillips.

In paragraphs 96 and 209 of the s42A report, the officer has recommended that specific mention is made within the subdivision matters of discretion under Rule 12.1.4.76, regarding the management of this interface. In paragraph 34 and Attachment 2 of his evidence, Mr Phillips has agreed with this recommendation of the officer. The matter of discretion reads as follows:

'Within the area defined by Outline Development Plan in Appendix 39, the appropriateness of any measures proposed to avoid or mitigate potential adverse effects at the interface with West Rolleston Primary School'.

The Ministry supports this amendment to Rule 12.1.4.76.

- Provision for Educational Facilities

In paragraphs 22.4 (d), 22.5 (d) and 29, and Attachments 3 and 4, of his planning evidence, Mr Phillips has recommended changes to the Holmes Block ODP text and Skellerup Block



ODP text to provide for a potential future expansion of West Rolleston Primary School and new educational facilities in either block. The Ministry supports these changes.

In paragraph 64 of the s42A report, the officer has agreed that there is a need 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. They have recommended that the following assessment matter be included in Rule 12.1.4.76 (see paragraph 209):

‘Whether, following consultation with the Ministry for Education, any land is required to be provided for a school site within the area defined by Outline Development Plan in Appendix 40 or for an extension of the West Rolleston Primary School within the area defined by Outline Development Plan in Appendix 39’

In paragraphs 28 and 29 of his evidence, Mr Phillips has agreed with the officer that the impact of the rezoning on the capacity of local schools can be appropriately managed through changes to the Operative Selwyn District Plan (OSDP) and has included amendments to the subdivision matters of discretion under Rule 12.1.4.76. The proposed wording of Mr Phillips is slightly different to that of the officer as follows (see Attachment 2):

‘Whether, following consultation with the Ministry for Education, any land is required to be provided for education purposes within the Outline Development Plans in Appendix 39 or 40’.

The Ministry supports the intent of both amendments provided by Mr Phillips and the officer, however, prefers the changes of Mr Phillips as the proposed wording accounts for an extension of West Rolleston Primary School, as well as potential new educational facilities in the Skellerup Block or the Holmes Block.

In consultation with the applicant, the Ministry also requested additional wording to Policy B4.3.77 of the OSDP, to reinforce the potential provision for educational facilities in both blocks. This has not been included in Mr Phillips evidence however the Ministry would still request that this wording is included as part of the plan change, as follows (proposed changes to B4.3.77 in red):

- *Policy B4.3.77*

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

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Outline Development Plan Area 14 (Holmes Block)

- *Potential provision of educational facilities or extension of West Rolleston Primary School;*

Outline Development Plan Area 15 (Skellerup Block)

- *Potential provision of educational facilities;*

- Traffic Effects

The Ministry support the upgrades to the following intersections that are nearby to West Rolleston Primary School and that will likely improve the safety of staff and students travelling to and from school:

- SH1/Dunns Crossing Road;
- Burnham School Road/Dunns Crossing Road
- Newman Road/Dunns Crossing Road; and

- Granite Drive/Dunns Crossing Road.

The Ministry's preference is that the upgrades to all four intersections are included in the ODP's or as rules or standards in the OSDP. In terms of the staging of development on account of intersection upgrades, and traffic effects from the development in general, the Ministry expects Council and the developers to ensure traffic effects on educational facilities in the area are appropriately managed.

- Cycle/Pedestrian Links

Mr Collins, from Flow Transportation Specialists, has been engaged by the Council to undertake a peer review of the Integrated Transport Assessment provided with the application. As per section 6.6 of his Transportation Hearing Report, he has recommended the following in relation to cycleways near West Rolleston Primary School:

'The Holmes Block should extend the walking and cycling green link near West Rolleston Primary School, to allow for flexibility in a connection to the School (if desired by the School Board), and connectivity to the transport network in the instance that a connection to the School is not formed'

It appears that the applicant has amended the Holmes Block ODP as per Attachment 3 to reflect this recommendation with walking/cycle links extending around the periphery of the school, as opposed to directly linking with the school. The Ministry supports this amendment as it allows the school to determine the best connection into the grounds from cycle/pedestrian links in the Holmes Block.

As stated in our original submission the Ministry supports in principle proposed cycling and pedestrian infrastructure as it assists in facilitating active travel modes.

- Rezoning of Additional Land

The Ministry reinforce their view that the rezoning of additional land requested by the 'Dunns Crossing Residents', 'A. Smith, D. Boyd and J. Blanchard', and 'Gallina Nominees Ltd and Heinz-Wattie Ltd Pension Plan', be rejected, as per the recommendation of the s42a report noted in paragraphs 75 and 76.

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 PPC73.

If PPC73 is accepted, the Ministry requests that the above matters are included 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 PPC73, are appropriately addressed.

Should you have any queries please contact the undersigned.



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