



## 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')

Address for service: C/- Beca Ltd  
PO Box 13960  
Christchurch 8141

Attention: Hugh Loughnan

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This is a submission on Private Plan Change Request 73 (PPC73) by Rolleston Industrial Holdings Limited to Selwyn District Council (SDC) to rezone 160 hectares of Living 3 to Living Z and Business 1 (Local Centre) on the western edge of Rolleston.

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

The Ministry have concerns about the proposed rezoning and future residential and business activities enabled by the rezoning due to potential effects on various schools, but in particular West Rolleston Primary School, in respect of student capacity, transport, amenity and contaminated land. The Ministry also notes the inconsistencies of PPC73 with the Canterbury Regional Policy Statement (CRPS).

The applicant has not undertaken any consultation with the Ministry or had any regard to the capacity of education infrastructure (as is required under the National Policy Statement for Urban Development).

There are a number of schools in the district that may be impacted by PPC73, but in particular West Rolleston Primary School which is located on the north west corner of Dunns Crossing Road and Burnham School Road, directly adjoining the plan change area (see Figure 1).



Figure 1: The approximate location of PPC73 (orange polygons) in relation to various schools in the district.

### Background:

The Ministry of Education 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 assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility not only for all State schools owned by the Crown, but also those State schools that are not owned by the Crown, such as designated character schools and State integrated schools. For the Crown owned State school 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 considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Selwyn district.

### The Ministry of Education's submission is:

There are two blocks proposed to be rezoned from Living 3 (rural residential type zoning) to Living Z and Business 1 (Local Centre) zoning (residential and business type zoning respectively), being the 'Holmes' block and the 'Skellerup' block. This will enable residential and business activities to be established on the

proposed sites, including the Holmes block directly adjoining West Rolleston Primary School. Both blocks are currently rural in nature.

**Policy Framework:**

The application acknowledges PPC73 is inconsistent with several provisions of the CRPS but considers the plan change is consistent with Policy 8 of the National Policy Statement for Urban Development (NPS-UD) which states;

- *Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well functioning urban environments, even if the development capacity is:*
  - a) *unanticipated by RMA planning documents; or*
  - b) *out-of-sequence with planned land release.*

The Ministry considers that PPC73 is inconsistent with the following provisions of the CRPS as the plan change site is outside of the Projected Infrastructure Boundary identified in the CRPS (Map A):

- 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 that PPC73 is inconsistent with the recent Greater Christchurch Partnership Our Space document which the Ministry generally supported (and reflects Map A).

Also, under the CRPS, Policy 6.3.3 states that Outline Development Plans (ODP) for plan change areas will:

- *“3. To the extent relevant show proposed land uses including:*
  - b) *Land required for community facilities or schools*

The applicant has not shown any site for a school in the ODP and the plan change has not assessed if a new school is required due to the increase of residents arising from the rezoning and consequent development. As indicated above, there has not been any consultation with the Ministry.

While the Ministry acknowledges Policy 8 of the NPS-UD there is clearly tension between this policy and the CRPS provisions, which is commented on further below.

### **Effects**

In terms of the plan change:

- The relative proximity to education facilities;
- The likely resultant increase in population;
- The types of activities enabled; and
- Inconsistencies with the policy planning framework;

all have the potential to create adverse effects on West Rolleston Primary School and other schools in the district including future educational facilities, in respect of the following:

- **School Roll Capacity**

The Ministry estimates that the addition of 2100 lots will add 500-800 primary aged students living west of Dunns Crossing Road, thereby increasing pressure on the rolls of West Rolleston Primary School as well as Lemonwood Grove School, Clearview Primary, Waitaha School, Lincoln High School and Rolleston College.

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

If PPC73 is approved, the Ministry will need to review its education networks in Rolleston, 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 west part of Rolleston. As such, PPC73 will have a significantly greater impact on school capacity than other recent private plan changes which have occurred within the Projected Infrastructure Boundary. This situation is exacerbated by the lack of consultation with the Ministry on PPC73.

Accordingly the Ministry requests that PPC73 is only approved if the applicant consults with the Ministry and sufficient provision is made to accommodate additional school age children which could include amending the ODP for the Skellerup Block to provide for a new school site, and amending the ODP for the Holmes Block to provide for an expansion of West Rolleston Primary School. Education facilities such as these will contribute to a well-functioning urban environment and provide an important community service.

While the Ministry is aware of the national direction of the NPS-UD in relation to unanticipated growth, it is noted that if PPC73 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 should also be balanced against other parts of the NPS-UD, which require Councils to ensure sufficient additional infrastructure (which includes schools) is provided.

Therefore, the Ministry also requests 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.

- **Transport**

The increase in people living and travelling in the area, as well as proposed transport infrastructure may have a range of effects on various schools in Rolleston, including West Rolleston Primary School as outlined below:

- Proposed roading connections from the Holmes Block to Dunns Crossing Road directly adjacent to the western side, and near to the southern side of West Rolleston Primary School, may impact on the safety of school staff and students, including increased traffic congestion around the school. These matters do not appear to have been addressed in detail in the application.
- The Business 1 (Local Centre) zone proposed adjacent to West Rolleston Primary School may increase congestion around the school which may result in safety issues for school staff and students. These matters do not appear to have been addressed in detail in the application.
- Rule 12.1.3.50 (a) indicates that traffic signals proposed at the Burnham School Road / Dunns Crossing Road intersection will require completion prior to the establishment of more than 97 houses on the block (as the site is already zoned for residential development at a rural residential density with the Holmes Block being permitted 97 lots). While the upgrade of this intersection is likely to improve the safety of school staff and students traveling in the area (particularly those crossing the intersection) it should be confirmed that 97 houses is an appropriate threshold.
- Proposed cycle and pedestrian connections along Burnham School Road and the Holmes Block, and multiple cycle/pedestrian connections to Dunns Crossing Road from the Skellerup Block are likely to improve access for school staff and students and improve safety.

The Ministry requests that the traffic effects of the proposed roading network and the Business 1 (Local Centre) zone on West Rolleston Primary School are addressed in sufficient detail and that if the plan change is approved, mitigation measures are included in PPC73 so that any effects are appropriately managed.

The Ministry also requests confirmation that appropriateness of the 97 houses threshold referred to in Rule 12.1.3.50 (a), is appropriate.

The Ministry supports in principle the proposed cycling and pedestrian infrastructure including linking to West Rolleston Primary School, as it assists in facilitating active travel modes.

- **Amenity Effects:**

The proposed Business 1 (Local Centre) zone in the Holmes Block may potentially affect the amenity of West Rolleston Primary School as it is located adjacent to the school and could result in an adverse effect on amenities relating to such matters as visual impact, bulk and location, noise and traffic. The plan change does not appear to address effects associated with the interface between these two activities in detail.

The change from Living 3 to Living Z will result in a higher density of development adjacent to West Rolleston Primary School but again the effects of this do not appear to be addressed in detail.

The Ministry requests that the interface between West Rolleston Primary School and the Business 1 (Local Centre) and Living Z zones are addressed in sufficient detail and that if the plan change is approved, mitigation measures are included in PPC73 to reduce potential amenity effects on West Rolleston Primary School to an acceptable level.

- **Contaminated Land**

Based on the PSI provided in the application, the applicant considers that any potential adverse effects associated with contaminated land can be adequately avoided or mitigated. However, while the PSI outlines that the site is considered to be suitable for residential use, it recommends a Detailed Site Investigation (DSI) should be carried out prior to any earthworks and or building consents being granted.

The presence of contaminated land may be an issue for West Rolleston Primary School during excavation of the site, and the Ministry support a DSI prior to development.

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

The Ministry requests that PPC73 should only proceed if the following matters are addressed:

- The potential inconsistencies between Policy 8 of the NPS-UD in and the CRPS are satisfactorily resolved particularly as it relates to development capacity and well-functioning urban environments;
- The applicant consults with the Ministry to ensure adequate provision is made to accommodate additional school age children;

This could include amending the ODP for the Skellerup Block to provide for a new school site and amending the ODP for the Holmes Block to provide for an expansion of West Rolleston Primary School;

- The traffic effects of the proposed roading network and the proposed Business 1 (Local Centre) zone on West Rolleston Primary School are addressed in sufficient detail and that if the plan change is approved, mitigation measures are included in PPC73 so that any effects are appropriately managed;
- Confirmation that the 97 houses threshold referred to in Rule 12.1.3.50 (a) is appropriate;
- The interface between West Rolleston Primary School and the Business 1 (Local Centre) and Living Z zones are addressed in sufficient detail and that if the plan change is approved, sufficient mitigation measures are included in PPC73 to reduce potential amenity effects on West Rolleston Primary School to an acceptable level; and
- That a DSI is undertaken prior to development to assess any potentially contaminated land which may be issue for West Rolleston Primary School during excavation of the site.

The Ministry also supports in principle the proposed cycling and pedestrian infrastructure including linking West Rolleston Primary School, as it assists in facilitating active travel modes.

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

**The Ministry contact person for asset planning is Stuart Graham. Contact details for Stuart are:**

Stuart Graham  
Infrastructure Manager- Asset Planning  
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[Stuart.Graham@education.govt.nz](mailto:Stuart.Graham@education.govt.nz)

**The Ministry contact person for network planning is Carey Clark. Contact details for Carey are:**

Carey Clark  
Regional Lead Advisor- Network Sector Enablement  
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**Hugh Loughnan  
Planner – Beca Ltd  
(Consultant to the Ministry of Education)**

**Date: 03/05/2021**

**From:** [Hugh Loughnan](#)  
**To:** [Tina Van Der Velde](#)  
**Cc:** [Paul Whyte](#); [4263529 - MoE RMA Monitoring Contract](#); [Karin Lepoutre](#)  
**Subject:** RE: Ministry of Education Submission on Private Plan Change 73  
**Date:** Tuesday, 4 May 2021 11:29:56 a.m.  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

Hi Tina

Apologies for not including that information on the submission.

I have replied to this question below.

*Can you please provide an answer to the following question by reply of this email;*

*Ministry of Education could gain an advantage in trade competition through this submission? Yes/No*

The Ministry of Education could **not** gain an advantage in trade competition through this submission

Let me know if you need anything else

Thanks

Sensitivity: General

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**From:** Tina Van Der Velde  
**Sent:** Tuesday, 4 May 2021 11:24 am  
**To:** Hugh Loughnan  
**Subject:** RE: Ministry of Education Submission on Private Plan Change 73

Kia ora Hugh,

Thank you for your submission on Private plan change request 73, West Rolleston. Ministry of Education's submission has been assessed for completeness under the First Schedule of the Resource Management Act 1991. Your submission was missing the following information:

Can you please provide an answer to the following question by reply of this email;

**Trade Competition Declaration:**

Ministry of Education could gain an advantage in trade competition through this submission? Yes/No

Thank you

Kind Regards

SDC DP Email Signature\_Tina Van Der Velde



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**From:** Hugh Loughnan [<mailto:Hugh.Loughnan@beca.com>]

**Sent:** Monday, 3 May 2021 4:00 p.m.

**To:** Submissions <[submissions@selwyn.govt.nz](mailto:submissions@selwyn.govt.nz)>

**Cc:** Emma Howie <[Emma.Howie@education.govt.nz](mailto:Emma.Howie@education.govt.nz)>; Stuart Graham <[Stuart.Graham@education.govt.nz](mailto:Stuart.Graham@education.govt.nz)>; Andrew Hill <[Andrew.Hill@beca.com](mailto:Andrew.Hill@beca.com)>; Paul Whyte <[paul.whyte@beca.com](mailto:paul.whyte@beca.com)>; Karin Lepoutre <[karin.lepoutre@beca.com](mailto:karin.lepoutre@beca.com)>; Carey Clark <[Carey.Clark@education.govt.nz](mailto:Carey.Clark@education.govt.nz)>; 4263529 - MoE RMA Monitoring Contract <[project-39864@workspace.beca.com](mailto:project-39864@workspace.beca.com)>; [jeremy@novogroup.co.nz](mailto:jeremy@novogroup.co.nz)

**Subject:** Ministry of Education Submission on Private Plan Change 73

Kia ora,

On behalf of the Ministry of Education, please find attached submission on Private Plan Change 73

Should you have any questions, please get in touch.

Nga Mihi | Kind regards,

**Hugh Loughnan**

Environmental Planner

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Sensitivity: General

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