



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 Private Plan Change Request 82 (PPC82) by Brookside Road Residential Limited (the applicant) to Selwyn District Council (SDC) to rezone approximately 110 hectares of Inner Plains to Living MD and Business 1 zones in West Rolleston. The sought rezoning could accommodate a potential additional 1320 households within Rolleston, achieving a minimum of 12hh/ha.

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

The Ministry wishes to highlight that the entirety of the plan change area outlined in PPC82 is outside of the Projected Infrastructure Boundary and consequently is not growth that was anticipated by the Ministry.

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 (NPS-UD). There are a number of schools in the district that may be impacted by PPC82, but in particular West Rolleston, Waitaha School, Lemonwood Grove School and Rolleston College (see Figure 1).



Figure 1: The approximate location of PPC82 (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 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:

Policy framework

The application is inconsistent with several provisions of the CRPS but considers the plan change is consistent with Policy 8 of the 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 PPC82 is generally inconsistent with the following provisions of the CRPS as the plan change area (PCA) 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 PPC82 is inconsistent with the recent Greater Christchurch Partnership Our Space document which the Ministry generally supported (and reflects Map A).

While the Ministry is aware of the national direction of the NPS-UD in relation to unanticipated growth, it is noted that if PPC82 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.

School capacity

PPC82 will result in a considerable increase in the population of West Rolleston. The proposed rezoning of the PCA would enable approximately 1320 residential households at a yield of 12 households per hectare. This will result in an increase of school age children within the catchment areas of West Rolleston Primary, Waitaha School, Lemonwood Grove and Rolleston College.

Consultation with the Ministry has not been undertaken by the applicant. The Ministry requests that PPC82 is only approved if the applicant consults with the Ministry and sufficient provisions are made to accommodate additional school age children, which could include amending the ODP to provide for a new school site via enabling provisions.

Additional education facilities will contribute to a well-functioning urban environment and provide an important community service to the residents of the PCA and surrounding area.

Traffic effects

The applicant's Transport Impact Assessment (ITA) prepared by Stantec anticipates the proposed plan change could generate 1,188 additional trips per peak hour, as a result of the potential 1320 new households. The ITA has not provided specific information regarding the potential and actual traffic and safety effects on the nearby schools/education facilities.

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 School, Waitaha School and Lemonwood Grove School.

The proposed ODP features a primary east – west route that provides a connection point from Dunns Crossing Road to Edwards Road, and a second primary east – west road from Edwards Road in to the Skellerup Block of PPC73. Another primary north – south route links the PPC73 Skellerup Block to a mid-point on Brookside Road. It is prudent to note that as SDC have accepted the Commissioner Caldwell's recommendation to decline PPC73 further consideration may need to be given to the proposed transport connections within the PCA given the routes through PPC73 may not be able to be relied upon.

The Ministry requests that specific information is provided on the potential and actual traffic and safety effects on the nearby schools and education facilities.

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

The Ministry requests that PPC82 should only proceed if the following matters are addressed:

- The potential inconsistencies between Policy 8 of the NPS-UD and the CRPS are satisfactorily resolved particularly as it relates to development capacity and well-functioning urban environments.
- Adequate consideration is given to ensuring there is sufficient capacity within the existing school network to accommodate school aged children, or enabling provisions are provided within the ODP. This could include amending the ODP to provide for a new school site.
- The applicant provides specific information on the potential and actual traffic and safety effects on the nearby schools and education facilities.
- Any consequential amendments required to give effect to the matters raised in this submission

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

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