



FORM 5

Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991.

To: Kaipara District Council

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

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This is a submission on the Proposed Plan Change 81: Dargaville Racecourse.

Background

The Ministry 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.

7.1

The Ministry has responsibility for all education property owned by the Crown. 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 Northland region.

The Ministry of Education's submission is:

Future school network impacts

Proposed Plan Change 81 (PPC) is seeking to rezone approximately 46.67ha of land in Dargaville from Rural to a combination of General Residential, Large Lot Residential, Light Industrial, Neighbourhood Centre and Open Space Area through the application of a Development area 'Trifecta Development Area' (TDA). The TDA has associated objectives, policies, rules and information requirements across the plan change area (PCA) to enable future development.

The proposed plan change will provide substantial development capacity and, as the PCA is currently zoned Rural and has been identified in the Kaipara Spatial Plan as land appropriate for industrial development, this residential growth is not anticipated by the Ministry. As the PPC would enable urban growth at densities that are greater than currently enabled, the demand on the local existing school network at Dargaville will likely increase.

7.2



In 2019, the Ministry developed the National Education Growth Plan 2030 (NEGP)¹, which provides a co-ordinated approach for addressing school-aged population growth across New Zealand. The NEGP identifies a number of catchments across the country and considers the anticipated demand and growth patterns so that the Ministry can ensure the school network is delivered in the right place at the right time.

Additional capacity within the Ministry's network will likely be required to service the growth of this plan change and the wider growth of Dargaville. Through this submission the Ministry is seeking that enabling provisions for educational facilities be included within the Trifecta Development Area to accommodate future educational facilities to enable the Ministry to service the growth and urban expansion of Dargaville.

The Ministry's position on the Proposed Plan Change

The Ministry is neutral on the Proposed Plan Change if the provisions outlined below are accepted.

The Ministry acknowledges that the proposed plan change will contribute to providing additional housing within the wider Northland Region. This may, however, require additional capacity in the local school network to cater for this growth as the area develops and potentially drives the need for a new school in the PCA.

The Ministry understands that the Council must meet the requirements under the National Policy Statement on Urban Development 2020 (NPS-UD) to provide development capacity for housing and business. The Ministry wishes to highlight that Policy 10 of the NPS-UD states that local authorities should engage with providers of development infrastructure and additional infrastructure (schools are considered additional infrastructure) to achieve integrated land use and infrastructure planning. In addition to this, subpart 3.5 of the NPS-UD states that local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available.

7.3

The Ministry therefore has an interest in:

- The inclusion of appropriate provisions for educational facilities within TDA.

It is noted that the Development Area Nesting Table in the PPC nests 'educational facilities' as an activity under 'community facilities', consistent with the operative Kaipara District Plan which includes 'educational facilities' within the definition of 'community facilities'. However, the current draft Kaipara District Plan considers 'educational facilities' and 'community facilities' as two activities and includes separate provisions for each activity. To avoid potential discrepancies in future in the application of the proposed provisions of the Trifecta Development Area the Ministry requests clarification on how educational facilities will be provided for within the Trifecta Development Area and seeks relief of explicit inclusion of educational facilities in the provisions of the Trifecta Development Area.

¹ National Education Growth Plan 2030, Auckland and Tai Tokerau, Ministry of Education, 2019. Available at: <https://www.education.govt.nz/our-work/publications/budget-2019/negp/#Auckland>



Decision sought

Overall, the Ministry is neutral on the PPC in its current form if the following relief and consequential amendments can be accepted.

The relief sought is shown in red underscore for additions and ~~red strikethrough~~ for deletions.

Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
TDA.1.1 Objective 3	Community facilities and services are available.	Support in Part	<p>The Trifecta Development Area has provisions for community facilities (which includes educational facilities in the Development Area nesting table). However, the inclusion of educational facilities as part of community facilities is not explicit as the definition for community facilities in the Trifecta Development Area does not include educational facilities.</p> <p>Further, this is inconsistent with the approach taken in the draft Kaipara District Plan, which has separate provisions for community facilities and educational facilities.</p> <p>The Ministry wishes to highlight the gap in the Trifecta Development Area once the draft Kaipara District Plan becomes operative, and requests the inclusion of educational facilities within the objective to specifically enable the establishment of schools.</p>	Community facilities and services <u>and educational facilities</u> are available.
TDA.1.2 Policy 5	Provide for community facilities and services that support the Hauora (wellbeing) of the neighbourhood.	Support in Part	<p>The Trifecta Development Area has provisions for community facilities (which includes educational facilities in the Development Area nesting table). However, the inclusion of educational facilities as part of community facilities is not explicit as the definition for community facilities in the Trifecta Development Area does not include educational facilities.</p> <p>Further, this is inconsistent with the approach taken in the draft Kaipara District Plan, which has separate provisions for community facilities and educational facilities.</p> <p>The Ministry wishes to highlight the gap in the Trifecta Development Area once the draft Kaipara District Plan becomes operative, and requests the inclusion of educational facilities within the policy to specifically enable the establishment of schools.</p>	Provide for community facilities and services <u>and educational facilities</u> that support the Hauora (wellbeing) of the neighbourhood.
TDA-LLRA-R20		New Provision	<p>The Trifecta Development Area objectives and policies provide for and enable the establishment of community facilities (including educational facilities) which support the wellbeing of the neighbourhood. However, community facilities are a Non-complying Activity in the Large Lot Residential Area.</p> <p>The Ministry considers this activity status to be inconsistent in achieving the objectives and policies of the Trifecta Development Area. The Ministry recognises the operational need for residential areas to provide for non-residential activities (such as educational facilities) to support the needs of local communities and recommends the inclusion of a new provision for educational facilities.</p>	<p><u>TDA-LLRA-R20 Educational Facility (Large Lot Residential Area)</u></p> <p><u>Activity Status: Restricted Discretionary</u></p> <p><u>Matters of Discretion:</u></p> <ul style="list-style-type: none"> a. <u>Character and amenity</u> b. <u>Design and layout</u> c. <u>Transport safety and efficiency</u> d. <u>Scale of activity and hours of operation</u>

7.4

7.5

7.6



			This new provision has been adopted from the draft Kaipara District Plan and sets out matters of discretion to manage any effects of educational facilities in the Large Lot Residential Area.	e. Infrastructure servicing																								
General Residential Area		New Provision	<p>The Trifecta Development Area objectives and policies provide for and enable the establishment of community facilities (including educational facilities) which support the wellbeing of the neighbourhood. However, community facilities are a Non-complying Activity in the General Residential Area.</p> <p>The Ministry considers this activity status to be inconsistent in achieving the objectives and policies of the Trifecta Development Area. The Ministry recognises the operational need for residential areas to provide for non-residential activities (such as educational facilities) to support the needs of local communities and recommends the inclusion of a new provision for educational facilities.</p> <p>This new provision has been adopted from the draft Kaipara District Plan and sets out matters of discretion to manage any effects of educational facilities in the General Residential Area.</p>	<p>TDA-GRA-R22 Educational Facility (General Residential Area)</p> <p>Activity Status: Restricted Discretionary</p> <p>Matters of Discretion:</p> <p>a. Character and amenity</p> <p>b. Design and layout</p> <p>c. Transport safety and efficiency</p> <p>d. Scale of activity and hours of operation</p> <p>e. Infrastructure servicing</p>																								
Neighbourhood Centre Area		New Provision	<p>The Trifecta Development Area objectives and policies provide for and enable the establishment of community facilities (including educational facilities) which support the wellbeing of the neighbourhood. However, community facilities in the Neighbourhood Centre Area must comply with Gross Floor Area (less than 300m²) and Associated Outdoor Area (less than 500m²) Standards which can be difficult for educational facilities to comply with.</p> <p>The Ministry considers the restrictive standards to be inconsistent in achieving the objectives and policies of the Trifecta Development Area. The Ministry recognises the operational need for educational facilities to be provided for in Neighbourhood Centre Areas to support the needs of local communities and recommends the inclusion of a new provision for educational facilities.</p> <p>This new provision has been adopted from the draft Kaipara District Plan and sets out matters of discretion to manage any effects of educational facilities in the Neighbourhood Centre Area.</p>	<p>TDA-NCA-R19 Educational Facility (Neighbourhood Centre Area)</p> <p>Activity Status: Restricted Discretionary</p> <p>Matters of Discretion:</p> <p>a. Character and amenity</p> <p>b. Design and layout</p> <p>c. Transport safety and efficiency</p> <p>d. Scale of activity and hours of operation</p> <p>e. Infrastructure servicing</p>																								
Development Area Definitions Nesting Table	<table><tr><td>Community Facility</td><td>Place of Assembly</td><td>Community Corrections Activity</td></tr><tr><td></td><td>Recreational Facilities</td><td></td></tr><tr><td></td><td>Emergency Services</td><td></td></tr><tr><td></td><td>Care Centre</td><td></td></tr></table>	Community Facility	Place of Assembly	Community Corrections Activity		Recreational Facilities			Emergency Services			Care Centre		New Provision	<p>The provisions in the Trifecta Development Area only specifically provide for community facilities, which is inclusive of educational facilities in the nesting table. However, the inclusion of educational facilities as part of community facilities is not explicit as the definition for community facilities in the Trifecta Development Area does not include educational facilities.</p> <p>Further, this approach is inconsistent with the draft Kaipara District Plan, which include separate provisions for community facilities and educational facilities.</p>	<table><tr><td>Community Facility</td><td>Place of Assembly</td><td>Community Corrections Activity</td></tr><tr><td></td><td>Recreational Facilities</td><td></td></tr><tr><td></td><td>Emergency Services</td><td></td></tr><tr><td></td><td>Care Centre</td><td></td></tr></table>	Community Facility	Place of Assembly	Community Corrections Activity		Recreational Facilities			Emergency Services			Care Centre	
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		Educational Facility			The Ministry wishes to highlight this gap in the Trifecta Development Area once the draft Kaipara District Plan becomes operative, and requests the inclusion of educational facilities as an independent activity in the nesting table.		Educational Facility	
		Hospital					Hospital	
		General Community					General Community	
						Educational Facility		

The Ministry requests regularly engagement with Kaipara District Council and the Applicant to keep up to date with the housing typologies being proposed, staging and timing of this development so that the potential impact of the plan change on the local school network can be planned for. The key Ministry contact email is Resource.Management@education.govt.nz

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



Vicky Hu

Planner – Beca Ltd

(Consultant to the Ministry of Education)

Date: 23 September 2022