



## Submission on the Mackenzie District Council – Proposed Plan Change 26.

To: Mackenzie District Council

**Name of submitter:** Ministry of Education Te Tāhuhu o Te Mātauranga ('the Ministry')

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

Attention: Daly Williams

Phone: (03) 371 3664

Email: daly.williams@beca.com

**This is a submission on the Proposed Mackenzie District Plan Change 26<sup>1</sup>**

### Introduction/Background

The Ministry of Education (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.

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 increasing 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 Mackenzie District.

### The Ministry's submission is:

The Ministry has a particular interest in the parts of the Proposed District Plan that, either directly or indirectly, have the potential to impact on the Ministry's interests, such as the management and operation of existing educational facilities or the establishment of new educational facilities. Proposed Plan Change 26: Renewable Electricity Generation and Infrastructure which will be discussed further below.

The provisions sought by the Ministry are listed in **Appendix 1** to this feedback.

---

<sup>1</sup> Terms marked with an \* above are terms used in relation to the proposed PC that are from the Operative Plan, but which are proposed through PC to be amended and are within scope of PC. Changes from the operative definition are shown using ~~strikethrough~~ or underlining.

**The Ministry seeks the following from the Mackenzie District Council:**

That the requested amendments, additions, or retentions to the District Plan, as set out in **Appendix 1**, be considered through the proposed plan process, including within the reporting planners s42a and subsequent hearing.

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



---

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

**Date: 26 January 2024**

Appendix 1: Plan Change 26 - Renewable Electricity Generation and Infrastructure

ID	Section of the Proposed District Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
Part 2: District-Wide Matters					
Energy, Infrastructure, and Transport					
INF - Infrastructure					
1	INF-O1	<b>Infrastructure</b> Infrastructure is developed and maintained to meet the needs, and provide for the health, safety and wellbeing, of people and communities and is integrated with subdivision, use and development.	Support	The Ministry supports INF-O1 and acknowledges that educational facilities, should only be established where the health, safety and wellbeing, of people and communities can be integrated and do not result in risk to subdivision, use and development.	Retain as proposed
2	INF-O2	<b>Adverse Effects on Infrastructure</b> The adverse effects of infrastructure on the surrounding environment are managed according to the sensitivity of the environment and the functional needs or operational needs of the infrastructure.	Support	The Ministry supports INF-O2 and acknowledges that educational facilities, should only be established where there is an operational need for them to be located.	Retain as proposed
3	INF-P1	<b>Benefits of Infrastructure</b> Recognise the national, regional and local benefits of infrastructure to the economic, social, cultural and environmental wellbeing, and health and safety, of people and communities, and the functioning of the District and beyond, by providing for infrastructure throughout the District.	Support	The Ministry supports INF-P1 and acknowledges that infrastructure for the purpose of educational facilities are beneficial to the economic, social, cultural and environmental wellbeing, and health and safety, of people and communities as they allow the district to function.	Retain as proposed
4	INF-P2	<b>Ongoing Use of Existing Infrastructure</b> Enable the operation, maintenance, replacement, reconstruction, and minor upgrades to, existing infrastructure.	Support	The Ministry supports INF-P2 as a policy and acknowledges that educational facilities, should enable the operation, maintenance, replacement, reconstruction, and minor upgrades to, existing infrastructure.	Retain as proposed
5	INF-P3	<b>Integration of Infrastructure</b> Encourage: <ol style="list-style-type: none"> <li>the coordination of infrastructure planning and delivery with land use, subdivision, development and urban growth;</li> <li>the co-location of structures and facilities; and</li> <li>technological improvements and enhancements.</li> </ol>	Support	The Ministry supports INF-P2 and acknowledges that educational facilities, should be integrated with land use, subdivision, development and urban growth.	Retain as proposed
6	INF-P4	<b>Managing Adverse Effects of Infrastructure</b> Manage infrastructure, including ancillary earthworks, so that: <ol style="list-style-type: none"> <li>its form, location and scale minimises adverse effects on the environment; and</li> <li>it is compatible with the values and anticipated character of the surrounding environment; while having regard to the operational needs and functional needs of the infrastructure.</li> </ol>	Support	The Ministry supports INF-P4 as a policy and acknowledges that educational facilities, should be compatible with the values and anticipated character of the surrounding environment, ensuring that there is an operational need for educational facilities.	Retain as proposed

ID	Section of the Proposed District Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
7	INF-P5	<p><b>Infrastructure in Sensitive or Significant Areas</b></p> <p>Avoid locating infrastructure in identified sensitive areas (outside the road reserve) or within an area of significant indigenous vegetation or significant habitat of indigenous fauna, unless:</p> <ol style="list-style-type: none"><li>there is a functional or operational need for the infrastructure to be in that location;</li><li>it is demonstrated through site, route or method selection, design measures and other management methods how significant adverse effects on the values of the sensitive or significant area have been avoided as far as practicable, and otherwise remedied or mitigated;</li><li>where there are more than minor adverse effects that cannot be avoided, remedied or mitigated, regard is had to any offsetting or compensation; and</li><li>Following application of 1. - 3. above, there are no significant adverse effects remaining, (except that this clause shall not apply to the national grid)</li></ol>	Support	The Ministry supports INF-P5 and acknowledges that educational facilities, should be compatible with sensitive and significant areas, ensuring that there is an operational need for educational facilities.	Retain as proposed
8	INF-P6	<p><b>Infrastructure on Highly Productive Land</b></p> <p>Avoid locating infrastructure on Highly Productive Land, unless:</p> <ol style="list-style-type: none"><li>it is small-scale and does not impact the productive capacity of the land; or</li><li>it is regionally significant infrastructure or lifeline utility infrastructure and has a functional need or operational need to be located on the highly productive land; and</li><li>for both 1. and 2. above, any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land within the District is minimised or mitigated.</li></ol>	Support	The Ministry supports INF-P6 and acknowledges that highly productive land should be avoided for infrastructure, unless that there is an operational need for educational facilities be located on the highly productive land.	Retain as proposed
9	INF-P7	<p><b>Infrastructure in Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna</b></p> <p>In addition to INF-P5, avoid new infrastructure (excluding the national grid) that has adverse effects on the following, in an area of significant indigenous vegetation and significant habitats of indigenous fauna:</p> <ol style="list-style-type: none"><li>loss of ecosystem representation and extent;</li><li>disruption to sequences, mosaics, or ecosystem function;</li><li>fragmentation of significant indigenous vegetation and significant habitats of indigenous fauna or the loss of buffers or connections within significant indigenous vegetation and significant habitats of indigenous fauna;</li><li>a reduction in the function of the significant indigenous vegetation and significant habitats of indigenous fauna as a buffer or connection to other important habitats or ecosystems; and</li><li>a reduction in the population size or occupancy of Threatened or At Risk (declining) species that use significant indigenous vegetation and</li></ol>	Support	The Ministry supports INF-P6 and acknowledges that significant indigenous vegetation and significant habitats of indigenous fauna should be avoided for infrastructure, unless that there is an operational need for educational facilities be located on the highly productive land.	Retain as proposed

ID	Section of the Proposed District Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		significant habitats of indigenous fauna for any part of their life cycle, unless it is lifeline utility infrastructure or regionally significant infrastructure, in which case INF-P5 applies instead, where:  6. the infrastructure provides significant national or regional public benefits;  7. there is a functional need or operational need for the infrastructure to be in that particular location; and  8. there are no practicable alternative locations for the infrastructure outside of an area of significant indigenous vegetation and significant habitats of indigenous fauna.			
10	INF-P9	<b>Managing Activities in the National Grid Yard</b>  Within the national grid yard, avoid sensitive activities, and avoid earthworks, buildings and structures that may compromise the safe, effective and efficient operation, maintenance, upgrading and development of the national grid, or constrain access to it.	Support	The Ministry supports INF-P9 and acknowledges that sensitive activities should be avoided within the national grid yard to ensure that there is a safe, effective and efficient operation, maintenance, upgrading and development of the national grid yard.	Retain as proposed
11	INF-R24	<b>New Sensitive Activities (including the use of an existing building for a new Sensitive Activity), within the National Grid Yard</b>  <b>Activity Status: Non complying</b>	Support	The Ministry acknowledges rule INF-R24 and that sensitive activities, which include educational facilities, should not be located in close proximity to the national grid yard.	Retain as proposed
12	INF-R30	<b>Buildings (excluding accessory buildings), Sensitive Activities, or the use of an existing building for a new sensitive activity, within the Electricity Distribution Corridor</b>  <b>Activity Status: Restricted Discretionary</b>  <b>Matters of discretion are restricted to:</b>  INF-MD3 Activities in the Electricity Distribution Corridor  <b>Advice Note:</b> Any application arising from this rule shall not be subject to public notification but may be limited notified only to the relevant electricity distribution line operator, unless their written approval is provided.	Support	The Ministry supports rule INF-R30 to manage sensitive activities. It is acknowledged that the Ministry may have an operational need to locate their assets within in an Electricity Distribution Corridor.  The Ministry supports the activity status of Restricted Discretionary for this zone to ensure that the consideration of effects is appropriately limited to matters of discretion.	Retain as proposed