



Submission on the Mackenzie District Council – Proposed Plan Change 27.

To: Mackenzie District Council

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

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This is a submission on the Proposed Mackenzie District Plan Change 27¹

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.

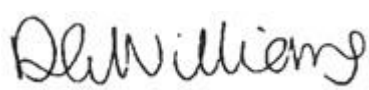
The specific amendments, additions or retentions to Proposed Plan Change 27: Subdivision, Earthworks, Public Access and Transport which will be discussed further below:

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

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 27 - Subdivision, Earthworks, Public Access and Transport

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					
TRAN - Transport					
1	TRAN-O1	Safe and Efficient Transport Network The transport network is a safe, well-connected, integrated, resilient, and accessible system that: 1. meets and is responsive to current and future needs; 2. promotes the use of alternative modes of transport; 3. is efficient and effective in moving people and goods within and beyond the district; 4. and is protected from reverse sensitivity effects.	Support	The Ministry supports the promotion of safe and efficient transport networks that meet the needs of all transport users.	Retain as proposed
2	TRAN-P1	Integrated Land Use and Transport Planning Maintain the safety and efficiency of the District’s transport network by: 1. Ensuring integration with land use; 2. Managing the levels of service, formation standards, and types of land transport infrastructure by compliance with design and operational standards and road hierarchy classifications; 3. Providing land transport infrastructure that is consistent with the zone in which it is located; 4. Providing for safe entry and exit for vehicles to and from a site to a road without compromising the safety or efficiency of the road corridor; and 5. Ensuring appropriate sightline visibility is provided to road users	Support	The Ministry supports TRAN-P1 and acknowledges that educational facilities should be integrated with the transport network.	Retain as proposed
3	TRAN-P3	Safe Active Transport Promote a range of transport options and enable safe multi modal connections that support walking and cycling.	Support	The Ministry supports TRAN-P3 as it promotes a wide range of transport options and specifically enables multi-modal connections which tamariki and rangatahi often use as a mode of transport to school.	Retain as proposed
4	TRAN-R6	Parking, Manoeuvring, and Loading Areas Associated with a Non-Residential Activity Activity Status: PER Where the activity complies with the following standards: TRAN-S1 Minimum Parking Space Requirements TRAN-S2 Size of Parking Spaces	Support	The Ministry supports TRAN-R6 to manage the Parking, Manoeuvring, and Loading Areas Associated with a Non Residential Activity. It is acknowledged that educational facilities may have an operational need to include parking, manoeuvring, and loading areas.	Retain as proposed

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		<div>TRAN-S3 Mobility Parking Requirement</div> <div>TRAN-S4 Reverse Manoeuvring</div> <div>TRAN-S5 Queuing</div> <div>TRAN-S6 Loading Areas</div> <div>TRAN-S7 Surface and Drainage of Parking and Loading Areas</div> <div>TRAN-S8 Landscaping</div> <div>TRAN-S14 Cycle Parking</div> <div>Activity status when compliance with standard(s) is not achieved: Refer to relevant standard(s).</div>																													
5	TRAN-Table 3	<div>Minimum Parking Spaces</div> <table><tr><th>Activity</th><th>Parking Spaces Required</th></tr><tr><td>Residential unit</td><td>2 spaces per residential unit including any minor residential unit</td></tr><tr><td>Residential unit (less than 150m² and no more than 2 bedrooms)</td><td>1 space per residential unit and 1 space per minor residential unit</td></tr><tr><td>Commercial visitor accommodation</td><td>1 space per 5 visitors accommodated plus 1 space per 2 staff</td></tr><tr><td>Commercial activities</td><td>3 spaces per 100m2 GFA plus 2 spaces per 100m2 outdoor display area</td></tr><tr><td>Industrial activity</td><td>2 spaces per 100m² workshop area plus 1 space per 100m² storage space</td></tr><tr><td>Meeting places and entertainment facilities</td><td>1 space per 10m² public area/10 seats, whichever is greater</td></tr><tr><td>Drive-through facility</td><td>5 queuing spaces per booth or facility</td></tr><tr><td>Sports fields</td><td>15 spaces per hectare</td></tr><tr><td>Hospitals</td><td>1 space per 5 beds plus 1 space per 2 staff</td></tr><tr><td>Healthcare facility</td><td>2 spaces per professional plus 1 space per 2 staff</td></tr><tr><td>Offices</td><td>2 spaces per 100m² GFA</td></tr><tr><td>Restaurants and taverns</td><td>10 spaces per 100m² public area</td></tr></table>	Activity	Parking Spaces Required	Residential unit	2 spaces per residential unit including any minor residential unit	Residential unit (less than 150m² and no more than 2 bedrooms)	1 space per residential unit and 1 space per minor residential unit	Commercial visitor accommodation	1 space per 5 visitors accommodated plus 1 space per 2 staff	Commercial activities	3 spaces per 100m2 GFA plus 2 spaces per 100m2 outdoor display area	Industrial activity	2 spaces per 100m² workshop area plus 1 space per 100m² storage space	Meeting places and entertainment facilities	1 space per 10m² public area/10 seats, whichever is greater	Drive-through facility	5 queuing spaces per booth or facility	Sports fields	15 spaces per hectare	Hospitals	1 space per 5 beds plus 1 space per 2 staff	Healthcare facility	2 spaces per professional plus 1 space per 2 staff	Offices	2 spaces per 100m² GFA	Restaurants and taverns	10 spaces per 100m² public area	Oppose	<div>The Ministry do not support TRAN-Table 3, educational facilities on-site carparking given it sets out minimum carparking standards.</div> <div>This is inconsistent with Policy 3.38 of the National Policy Statement for Urban Development which states that “a tier 1, 2, or 3 territorial authority contains objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity, the territorial authority must change its district plan to remove that effect, other than in respect of accessible car parks”.</div> <div>Mackenzie District Council is a tier 3 territorial authority, as such, is required under the NPS-UD to remove minimum car parking standards.</div>	<u>Request removal of TRAN-Table 3.</u>
Activity	Parking Spaces Required																														
Residential unit	2 spaces per residential unit including any minor residential unit																														
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		Educational facilities	1 space per 1 staff plus 1 space per 10 students over 15 years of age			
		Retirement village	1 space per residential unit			
		Recreational facilities	1 space per 4 persons designed to be accommodated			
General District-Wide Matters						
EW - Earthworks						
6	EW-O1	Earthworks Earthworks to facilitate subdivision, land use and development are undertaken in a way that minimises adverse effects on landscape values, visual amenity and mana whenua values and protects the safety of people, property and infrastructure.		Support	The Ministry supports EW-O1 and acknowledges that educational facilities should minimise adverse effects on earthworks to facilitate land use and development.	Retain as proposed
7	EW-P2	Manage Earthworks Manage the adverse effects of earthworks, including their scale and nature, to: 1. minimise adverse effects on the character, values and qualities of the surrounding environment, relative to the sensitivity of the surrounding environment; 2. avoid unreasonable effects on stability of adjoining land, infrastructure, buildings, and structures; 3. minimise silt and sediment loss from the site; and 4. ensure that sites are appropriately rehabilitated following completion of earthworks.		Support	The Ministry supports EW-P2 and acknowledges that educational facilities should manage the adverse effects.	Retain as proposed
8	EW-R4	Earthworks not Specified in EW-R1, EW-R2 or EW-R3 Activity Status: PER Where: 1. Earthworks on any site shall not exceed 1000m³ by volume and 1000m² by area per site in any 5-year period. And the activity complies with the following standards: EW-S1 — Maximum slope Gradient EW-S2 — Excavation and Filling EW-S3 — Rehabilitation and Reinstatement EW-S4 — Accidental Discovery Protocol EW-S5 — Specific Locations EW-S6 — Proximity to the National Grid Activity status when compliance is not achieved with R4.1: CON Where:		Support	The Ministry supports the rule EW-R4 and acknowledges that educational facilities should comply with the earthworks not specidied in EW-R1, EW-R2 or EW-R3, and the listed standards.	Retain as proposed

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		<p>2. Earthworks on any site is more than 1000m but less than 1500m by volume, and is more than 1000m and less than 2500m by area per site in any 5- year period.</p> <p>And the activity complies with the following standards:</p> <p>EW-S1 — Maximum Slope Gradient</p> <p>EW-S2 — Excavation and Filling</p> <p>EW-S3 — Rehabilitation and Reinstatement</p> <p>EW-S4 — Accidental Discovery Protocol</p> <p>EW-S5 — Specific Locations</p> <p>EW-S6 — Proximity to the National Grid</p> <p>Matters of control are limited to:</p> <p>a. The effects of stockpiling.</p> <p>b. The visual effects on landscape values.</p> <p>c. Where any earthworks are within a SASM, those matters in SASMMD1 Activities in a SASM.</p> <p>Activity status when compliance is not achieved with R4.2: DIS</p> <p>Activity status when compliance with standard(s) is not achieved:</p> <p>Refer to relevant standard(s).</p>			