

From: [Portia King](#)
To: [RPS](#)
Cc: [Hugh Loughnan](#); [Andrew Hill](#); [Karin Lepoutre](#); [4263529 - MoE RMA Monitoring Contract](#); [Stuart Graham](#); [Resource Management](#); [Kate Graham](#)
Subject: Submission on the Proposed Regional Policy Statement - Ministry of Education
Date: Friday, 27 August 2021 3:53:06 p.m.
Attachments: [image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[Ministry of Education Submission on the ORC Proposed RPS.pdf](#)

Kia ora

Please find attached a submission on the Proposed Regional Policy Statement on behalf of the Ministry of Education.

Ngā mihi

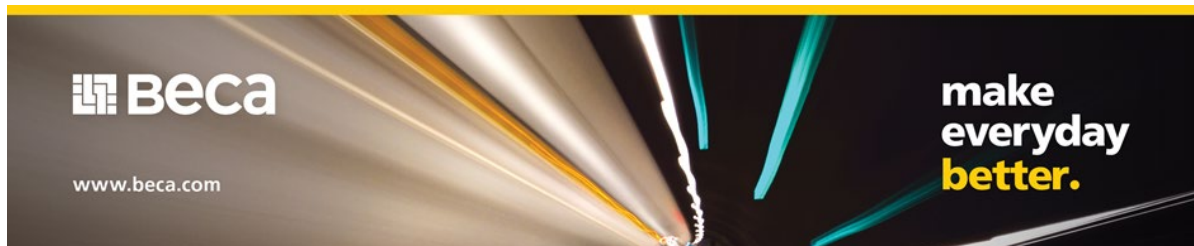
Portia King

Planner

Beca

DDI: +64 3 374 3160

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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: Otago Regional Council

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

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

Attention: Portia King

Phone: (03) 374 3160

Email: Portia.King@beca.com

This is a submission on the Proposed Otago Regional Policy Statement ('Proposed RPS'). The Ministry previously provided feedback to Otago Regional Council in response to the draft Otago Regional Policy Statement in March 2021.

The Ministry has previously provided feedback on the draft RPS and we commend Council for taking into consideration that feedback as part of the proposed RPS.

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

The Ministry of Education ('the Ministry') have provided feedback on provisions in the Proposed RPS relating to drinking water and freshwater, regionally significant infrastructure, transport, and urban development.

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 (including policy directions) 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 has many schools within the Otago Region and is therefore a considerable stakeholder in terms of the policy direction and rules that may impact on existing and future educational facilities and assets in the Otago region

The Ministry of Education's submission

The Ministry's detailed comments on specific provisions within the proposed RPS are provided in the table below and generally support specific provisions in relation to:

- Safe drinking water
- The consideration of additional infrastructure requirements as part of growth planning
- The provision of a well-integrated public transport system.

The Ministry would welcome the opportunity to discuss these points further as development of the Proposed RPS progresses.

The key Ministry contact person is Stuart Graham. Contact details for Stuart are:

Stuart Graham
Infrastructure Manager- Asset Planning
+64 3-378 7886
Stuart.Graham@education.govt.nz

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

A handwritten signature in black ink that reads "P. King". The signature is written in a cursive, flowing style.

Portia King
Planner – Beca Ltd
Consultant to the Ministry of Education

Date: 27/08/2021

Table A. Comments on specific provisions of the Proposed RPS.

Page Number	RPS Provision Reference	Issue and Explanation or Reasons	Proposed Alternative Text (shown in <u>underline</u> (addition) and strikethrough (delete))
LF – Land and Freshwater – Te Mana o Te Wai			
Policies			
129	LF-FW-P7 – Fresh water	The Ministry supports that the use of freshwater and land is managed so that drinking water supplies are safe for human consumption (as outlined in provision 4) as this will include school drinking water supplies.	
Methods			
133	LF-FW-M6 – Regional plans	The Ministry support the inclusion of provision (4)(f) which provides for community drinking water supplies as it includes school water supply.	
Anticipated Environmental Results			
136	LF-AER7	The Ministry supports this outcome that requires water in Otago's aquifers is suitable for human consumption as it will include water for school use/consumption.	
INF – Infrastructure			
Objectives			
158	EIT-INF-P17 – Urban growth and infrastructure	The Ministry supports this policy to the extent that additional infrastructure includes schools, and additional infrastructure should be provided for in urban growth.	
TRAN - Transport			
Policies			
161	EIT-TRAN-P19 - Transport system design	The Ministry supports this policy to the extent that well-integrated active transport infrastructure enables easy and safe access to schools. The safety of school staff and students travelling to and from school is important to the Ministry.	
161	EIT-TRAN-P20 – Public transport	The Ministry supports this policy that enhances the uptake of public transport while ensuring the safety and amenity for pedestrians and cyclists. The safety of school staff and students travelling to and from school is important to the Ministry.	
Methods			

163	EIT-TRAN-M8 – District plans	The Ministry supports provision (3) requiring that district plans include design standards that recognise the needs of the entire community, including children. The Ministry supports provision (4) to prevent the development of activities that may compromise the safety of the transport system and negatively impact on the safety of school staff and students.	
Anticipated Environmental Results			
UFD - Urban Form and Development			
Objectives			
186	UFD-O2 – Urban areas	The Ministry supports this policy on the basis that schools are considered under the term 'additional infrastructure' and need to be provided for in the development of urban areas.	
Policies			
187	UFD-P1 – Strategic planning	The Ministry supports this policy on the basis that schools are considered under the term 'additional infrastructure' and need to be considered as part of the strategic planning process.	
188	UFD-P3 – Urban intensification	The Ministry acknowledges that schools are considered under the term 'additional infrastructure' in part (2) of this policy. The policy requires intensification to be serviced by additional infrastructure however it does not consider the capacity of that additional infrastructure.	The Ministry request that this policy be amended as follows: (2) is well-served by existing or planned development infrastructure and additional infrastructure <u>that has sufficient capacity.</u>
190	UFD-P4 – Urban expansion	The Ministry supports this on the basis that schools are considered under the term 'additional infrastructure' which need to be integrated as part of any urban expansion consideration.	
190	UFD-P8 – Rural lifestyle and rural residential zones	The Ministry supports this on the basis that schools are considered under the term 'additional infrastructure' and will need to be considered in the development of lifestyle blocks.	
191	UFD-P10 – Criteria for significant development capacity	The Ministry supports provision (4)(c) to include the location and capacity of education facilities as a criterion for determining where increasing development capacity is appropriate. This will contribute to ensuring that adequate capacity of schools is possible where population growth is expected and provides the opportunity for the Ministry and Council to collaborate in the early stages of development.	
Methods			

192	UFD-M1 – Strategic planning	The Ministry supports this method to the extent that additional infrastructure considerations will be integrated into the strategic planning processes of all ORC’s territorial authorities.	
Anticipated Environmental Results			
	UFD-AER2	The Ministry supports this AER on the basis that schools are considered under the term ‘additional infrastructure’.	