

**From:** [Portia King](#)  
**To:** [RPS](#)  
**Cc:** [4263529 - MoE RMA Monitoring Contract](#); [Karin Lepoutre](#); [Andrew Hill](#); [Hugh Loughnan](#)  
**Subject:** Further Submission - Ministry of Education - Proposed Otago regional Policy Statement  
**Date:** Thursday, 11 November 2021 4:58:21 p.m.  
**Attachments:** [image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[ORC Proposed RPS - Further Submission - Ministry of Education .pdf](#)

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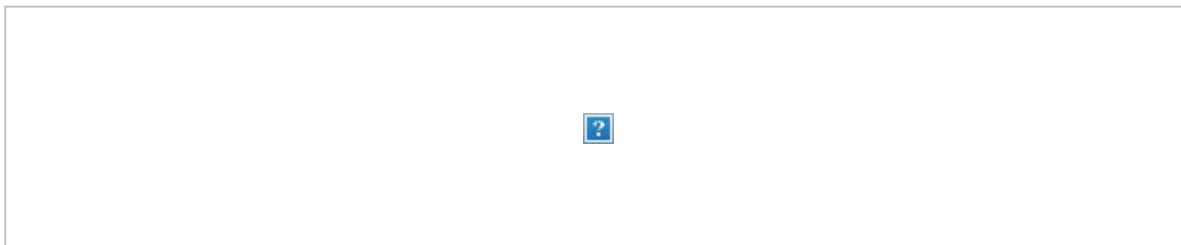
Please find attached a further submission on behalf of the Ministry of Education on the Proposed Otago regional Policy Statement.

We wish to be heard in support in the further submission.

A copy of this further submission will also be served on all original submitters.

Ngā mihi

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Sensitivity: General

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## FORM 6

### **Further submission in support of, or opposition to, submission on publicly notified proposed policy statement or plan, change or variation under Clause 8 of Schedule 1, Resource Management Act 1991**

To: Otago Regional Council

**Name of submitter:** Ministry of Education

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 further submission to various submissions on the Proposed Otago Regional Policy Statement ('Proposed RPS') on behalf of the Ministry of Education ('The Ministry').**

The specific parts of the further submission that the Ministry's submission relates to are submissions on provisions that either directly or indirectly have the potential to impact on the Ministry's interests and ability to achieve its purpose.

The Ministry previously provided feedback to Otago Regional Council in response to the Proposed RPS in September 2021 and the draft RPS in March 2021.

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

The Ministry have provided feedback on provisions in the Proposed RPS relating to drinking water and freshwater, additional infrastructure provisions, and urban development.

**The Ministry's further submission is:**

That the specific amendments, additions, or deletions which are sought and outlined in this further submission attached as **Table A** below are adopted.

The Ministry looks forward to working with the Council to ensure that the District Plan review adequately provides for the needs of educational facilities.

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](mailto:Stuart.Graham@education.govt.nz)

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



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

**Date:** 11/11/2021

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

Our position on this submission point is:	Summary of Decision Requested:	Support or Oppose	The reasons for my support/opposition are:	We seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].
<b>Points that the Ministry did not originally submit on</b>				
00321.004 New Zealand Infrastructure Commission	<p><b>Definitions - Infrastructure</b></p> <p>Amend as follows:</p> <ul style="list-style-type: none"> <li>• Adding defence, corrections, health and educational facilities to this definition</li> </ul> <p>Rationalising infrastructure definitions for clarity, and/or adding further explanation as to the different contexts in which they are used (i.e. some subset definitions are used in the Urban Form and Development policies in terms of regulating when other development can occur, while others are used in relation to providing direction as to how the effects of infrastructure itself are to be managed).</p>	Oppose in part	The Ministry supports that educational facilities are provided for under the 'Additional Infrastructure' definition which is consistent with the NPS-UD.	That educational facilities are not listed under the definition of 'Infrastructure'.
00321.008 New Zealand Infrastructure Commission	<p><b>Definitions - Specified Infrastructure</b></p> <p>Add schools, and corrections facilities</p>	Oppose in part	The Ministry supports that educational facilities are provided for under the 'Additional Infrastructure' definition which is consistent with the NPS-UD.	That schools are not listed under the definition of 'Specified Infrastructure'.
00208.003 AgResearch Limited	<p><b>Definitions - Rural research activities</b></p> <p>In the "Definitions" section, add the following definition for "Rural research activities":</p> <p>Land, buildings and facilities used for research and development associated with primary production activities, including (but not limited to) buildings and structures housing animals, field trials, education facilities, conference facilities, laboratories, pilot plants for research purposes, staff and administrative offices and facilities, visitor facilities, field days, and any ancillary activities and accessory buildings.</p>	Support	The Ministry supports provision for educational facilities under the 'rural research activities' definition.	That whole submission point be allowed.
00509.048 Wise Response Society Inc	<p><b>Integrated Management IM-M3</b></p> <p>Amend as follows: Identification of climate change hazard impacts and community guidance</p> <p>(1) identify the specific types and locations of climate change impacts in Otago by undertaking a climate change risk assessment, out to 2100 including an assessment that incorporates a Kāi Tahu approach to climate change risk identification and evaluation, by 2022 to inform the Land Water Plan, and</p>	Oppose in part	While the Ministry does not oppose the concept of education programmes, this detail is not considered appropriate for an RPS and commits the Ministry to an action that is better developed as part of the National Curriculum.	That school education programmes are not included IM-M3.

Our position on this submission point is:	Summary of Decision Requested:	Support or Oppose	The reasons for my support/opposition are:	We seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].
	<p>(2) develop guidance to support communities to be prepared and resilient.</p> <p>(3) develop a programme with schools to inform their pupils on how they can quantify greenhouse gas footprints for application in all aspects of their lives.</p>			
<b>LF-FW-P7</b>				
00236.064 Horticulture New Zealand	Request the policy be deleted	Oppose	The Ministry considers this policy is appropriate. In particular, the Ministry supports that it includes school drinking water supplies and considers that this policy is necessary to ensure safe drinking water for school staff and students.	That whole submission point be disallowed.
<b>LF-AER7</b>				
00236.066 Horticulture New Zealand  00239.092 Federated Farmers of New Zealand	Delete LF – FW – AER7	Oppose	The Ministry considers that proposed AER7 is appropriate as water in aquifers should be suitable for human consumption.	That whole submission point be disallowed.
00240.024 New Zealand Pork Industry Board	Delete or amend as this outcome is an essential need and relevant only to those water sources (ground and surface) necessary to satisfy that need.	Oppose	The Ministry considers that proposed AER7 is appropriate as water in aquifers should be suitable for human consumption.	That whole submission point be disallowed.
<b>UFD-O2</b>				
00139.251 Dunedin City Council	<p>Amend to read:</p> <p>The towns and cities in Otago have well – functioning urban environments, that:</p> <p>(1) provide good housing choice, quality, and affordability;</p> <p>(2) have liveable, safe and well – designed centres and neighbourhoods that support social, cultural and economic wellbeing;</p> <p>(3) have appropriate and adequate opportunities for business and community activities to establish and operate in a way that supports business and community needs and the overall urban form objective in UFD – 01; and</p>	Oppose	The Ministry considers the proposed objective wording is appropriate. In particular, the Ministry supports subclause (9) as it provides for educational facilities. The Ministry opposes DCCs proposed wording that excludes specific mention to 'additional infrastructure'.	That whole submission point be disallowed.

Our position on this submission point is:	Summary of Decision Requested:	Support or Oppose	The reasons for my support/opposition are:	We seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].
	<p>(4) retain, and provide opportunities to celebrate and appreciate, significant heritage, natural environment and mana whenua values</p> <p>(5) have development opportunities which support the aspirations and values of mana whenua.</p>			
<b>UFD-P1</b>				
00139.255 Dunedin City Council	<p>Amend to reword as a course of action, as follows: Undertake strategic planning processes at an appropriate scale and detail to direct and facilitate urban growth and development in a way that:</p> <p>(1) ensures there is sufficient development capacity supported by integrated infrastructure provision for Otago's housing and business needs in the short, medium and long term;</p> <p>(2) integrates land use and infrastructure planning, including how, where and when necessary;</p> <p>(3) development infrastructure and additional infrastructure will be provided, and by whom;</p>	Neutral	The Ministry is neutral in regard to the submitters requested amendment, however, supports retaining specific reference to 'additional infrastructure' to ensure adequate provisions for educational facilities.	That the proposed policy retain specific reference to 'additional infrastructure'.
<b>UFD-P8</b>				
00139.263 Dunedin City Council	<p>Delete provision or amend as follows:</p> <p><u>Provide appropriate opportunities for rural residential or 'hobby farm' activities where this does not conflict with the objectives of this RPS particularly Objectives UFD – 01 and UFD – 02 and where these activities are directed to areas zoned for that purpose.</u></p> <p><u>In identifying areas appropriate for new rural residential zoning avoid areas:</u></p> <p><u>(1) where development at this scale will conflict with other objectives in this RPS</u></p> <p><u>(2) where land is identified for, or may be appropriate for, future urban expansion;</u></p> <p><u>(3) that may give rise to significant reverse sensitivity effects; and</u></p> <p><u>(4) of highly productive land identified in accordance with LF – LS – P16.</u></p>	Oppose	The Ministry considers the proposed policy is appropriate as it specifically provides for additional infrastructure which includes educational facilities. The Ministry opposes this submission point as it does not specifically provide for additional infrastructure.	That whole submission point be disallowed.

Our position on this submission point is:	Summary of Decision Requested:	Support or Oppose	The reasons for my support/opposition are:	We seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].
00414.006 Infinity Investment Group Holdings Ltd  00413.008 New Zealand Cherry Corp Ltd	Amend as follows:  The establishment, development or expansion of rural lifestyle and rural residential zones only occurs <u>in locations which are suitable, having regard to where:</u>  1. <del>the land is adjacent</del> <u>proximity</u> to existing or planned urban areas and ready access to employment and services is available,  2. despite the direction in (1), also <u>avoiding</u> land identified for future urban development in a relevant plan or land reasonably likely to be required for its future urban development potential, where the rural lifestyle or rural residential development would foreclose or reduce efficient realisation of that urban development potential,  3. <u>minimises</u> impacts on rural production potential, amenity values and the potential for reverse sensitivity effects to arise,  4. <u>avoids, as the first priority, for</u> highly productive land identified in accordance with LF – LS – P16:  <u>a. the extent to which the development will impact on the existing and future use of the land for primary production;</u>  <u>b. whether there is an operational a practical and functional need for the development to be located in rural areas,</u>  <u>c. the potential for reverse sensitivity effects and proposed methods to avoid or mitigate potential adverse effects on, and conflicts with, lawfully established activities, and</u>  <u>d. the environmental, economic, social and cultural benefits of the proposed activity compared to the long-term benefits that would occur from the continued or potential use of the land for primary production,</u> ...  6. <del>provides</del> <u>providing</u> for the maintenance and wherever possible, enhancement, of important features and values identified by this RPS.	Oppose	The Ministry considers the proposed policy is appropriate as it specifically provides for additional infrastructure which includes educational facilities. The Ministry opposes this submission point as it does not specifically provide for additional infrastructure.	That whole submission point be disallowed.
<b>UFD-M1 - Strategic Planning</b>				
00139.266 Dunedin City Council	Delete	Oppose	The Ministry considers the proposed method wording is appropriate. In particular, the Ministry support subclause (4) which provides for additional infrastructure including educational facilities.	That the whole submission point be disallowed.