

Submission on Proposed Plan Change 2: Intensification

To: Kāpiti Coast District Council

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

Address for service: C/-Beca Ltd
PO Box 6345
Wellesley
Auckland 1141

Attention: Sian Stirling

Phone: +64 9 300 9722

Email: Sian.Stirling@beca.com

This is a submission on Kāpiti Coast District Council - Proposed Plan Change 2: Intensification (PPC2)

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.

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 Auckland region.

The Ministry of Education's submission is:

Future school network impacts

PPC2 to the Operative Kāpiti Coast District Plan, is seeking to introduce housing intensification, in line with Resource Management (Enabling Housing Supply and Other Matters) Amendment Act and the National Policy Statement on Urban Development (NPS-UD), by:

- incorporating the Government's Medium Density Residential Standards (MDRS), allowing the construction of up to three three-storey residential units on most sites in the General Residential Zone



- enabling increased levels of development in and around Kāpiti's centres and around the train stations at Paekākāriki, Paraparaumu and Waikanae.
- rezoning some land to General Residential Zone (where the MDRS applies)
- providing for qualifying matter areas where development is less enabled.

The proposed increase in residential density will put pressure on the local school networks. Through this submission, the Ministry is seeking that provisions for educational facilities be included, to enable the Ministry to service the growth of PPC2 in the Kapiti Coast.

The Ministry's position on the Proposed Plan Change 2

The Ministry is neutral on the PPC2 if the provisions outlined below and in Appendix 1 are accepted.

The Ministry acknowledges the changes will contribute to providing additional housing within the Kāpiti Coast District. This will require additional capacity in the local school network to cater for this growth as the area develops and potentially drive the need for additional schools throughout the district in the future.

The Ministry understands 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 the additional infrastructure to service the development capacity is likely to be available.

Growth as a result of the changes and wider urban growth will require careful planning and communication between Kāpiti Coast District Council and the Ministry to meet community demand for educational facilities.

The Ministry therefore has an interest in:

- Ensuring the District Plan specifically acknowledges and provides for schools. This is critical given schools are an essential piece of social and community infrastructure. An absence of supportive provisions can place obstacles in the way of the establishment of education facilities in future years.

The Ministry broadly supports provisions in the PPC2 that seek to put in place a framework that will deliver integrated communities that support the concepts of liveable, walkable and connected neighbourhoods. This includes a transport network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

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 Ministry requested relief on PCC2 is outlined in Appendix 1 to this submission. Additions are shown as underlined and deletions as ~~strikeouts~~. Council's amendments as part of PCC2 are shown in **black**. The Ministry's requested amendments are shown in **red**.

Given the level of increase in housing provision in the Kāpiti Coast as a result of the PPC2 changes, the Ministry requests regular engagement with Kāpiti Coast District Council to keep up to date with the housing typologies being proposed, staging and timing of 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.

Sian Stirling
Planner- Beca Ltd
(Consultant to the Ministry of Education)
Date: 15 September 2022

Appendix 1 - The Ministry of Education's Submission on the Proposed Plan Change 2: Intensification

Additions are shown as underlined and deletions as ~~strikeouts~~. Council's amendments as part of PCC2 are shown in black. The Ministry's requested amendments are shown in red.

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/	Reason for Submission	Relief Sought (in red)
1	DO-03	<p>Development Management</p> <p>To maintain a consolidated urban form within existing urban areas and a limited number of identified growth areas, which and to provide for the <u>development of new urban areas where these</u> can be efficiently serviced and integrated with existing townships, delivering:</p> <ol style="list-style-type: none"> 1. urban areas which maximise the efficient end use of energy and integration with infrastructure; 2. a variety of living and working areas in a manner which reinforces the function and vitality of centres; 3. <u>an urban environment that enables more people to live in, and more businesses and community services to be located in, parts of the urban environment:</u> <ol style="list-style-type: none"> a. <u>that are in or near a Centre Zone or other area with many employment opportunities; or</u> b. <u>that are well serviced by existing or planned public transport; or</u> c. <u>where there is high demand for housing or for business land relative to other areas within the urban environment;</u> 4. 3. resilient communities where development does not result in an increase in risk to life or severity of damage to property from natural hazard events; 5. 4. higher residential densities in locations that are close to centres and public open spaces, with good access to public transport; 6. 5. management of development in areas of special character or amenity so as to maintain, and where practicable, enhance in a manner that has regard to those special values; 7. 6. sustainable natural processes including freshwater systems, areas characterised by the productive potential of the land, ecological integrity, identified landscapes and features, and other places of significant natural amenity; 8. 7. an adequate supply of housing and areas for business/employment to meet the needs of the District's anticipated population which is provided at a rate and in a manner that can be sustained within the finite carrying capacity of the District; and 9. 8. management of the location and effects of potentially incompatible land uses including any interface between such uses.; and 10. <u>urban environments that support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.</u> 	Support in part	<p>Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure' (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). Educational facilities should therefore be enabled in the Operative District Plan to service the growth that PCC2 will enable. The Ministry request the following relief.</p> <p>A definition of 'additional infrastructure' should subsequently be included in the definitions chapter under the NPS-UD.</p>	<p>Development Management</p> <p>To maintain a consolidated urban form within existing urban areas and a limited number of identified growth areas, which and to provide for <u>the development of new urban areas where these</u> can be efficiently serviced and integrated with existing townships, delivering:</p> <ol style="list-style-type: none"> 1. urban areas which maximise the efficient end use of energy and integration with infrastructure; 2. a variety of living and working areas in a manner which reinforces the function and vitality of centres; 3. <u>an urban environment that enables more people to live in, and more businesses and community services to be located in, parts of the urban environment:</u> <ol style="list-style-type: none"> a. <u>that are in or near a Centre Zone or other area with many employment opportunities; or</u> b. <u>that are well serviced by existing or planned public transport; or</u> c. <u>where there is high demand for housing or for business land relative to other areas within the urban environment;</u> d. <u>where there is sufficient capacity within the existing or planned infrastructure network (including additional infrastructure) to service the growth.</u> 4. 3. resilient communities where development does not result in an increase in risk to life or severity of damage to property from natural hazard events; 5. 4. higher residential densities in locations that are close to centres and public open spaces, with good access to public transport; 6. 5. management of development in areas of special character or amenity so as to maintain, and where practicable, enhance in a manner that has regard to those special values; 7. 6. sustainable natural processes including freshwater systems, areas characterised by the productive potential of the land, ecological integrity, identified landscapes and features, and other places of significant natural amenity; 8. 7. an adequate supply of housing and areas for business/employment to meet the needs of the District's anticipated population which is provided at a rate and in a manner that can be sustained within the finite carrying capacity of the District; and 9. 8. management of the location and effects of potentially incompatible land uses including any interface between such uses.; and

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/	Reason for Submission	Relief Sought (in red)
					10. <u>urban environments that support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.</u>
2	UFD-P1	<p>Growth Management</p> <p>New urban <i>development</i> for residential activities will only be located within <i>existing urban areas</i> and <i>identified growth areas</i>, and will be undertaken in a manner which:</p> <ol style="list-style-type: none"> 1. supports the District's consolidated urban form; 2. maintains the integrity of the urban edge north of Waikanae and Ōtaki; 3. manages residential densities by: <ul style="list-style-type: none"> a. enabling medium density housing and focused infill housing in identified precinct areas that are close to centres, public open spaces, and public transport nodes; b. retaining a predominantly low residential density in the Residential Zones; c. avoiding any significant adverse effects of subdivision and development in special character areas identified in GRZ-P3; <u>a. providing for a variety of housing types and densities in the General Residential Zone;</u> <u>b. enabling increased housing densities:</u> <ol style="list-style-type: none"> <u>i. in, and within a walkable catchment of the Metropolitan Centre Zone;</u> <u>ii. within a walkable catchment of the train stations at Paekākāriki, Paraparaumu and Waikanae; and</u> <u>iii. in and adjacent to the Town Centre Zone and Local Centre Zone;</u> 4. avoids urban expansion that would compromise the distinctiveness of existing settlements and unique character values in the rural <i>environment</i> between and around settlements; 5. can be sustained within and makes efficient use of existing capacity of public services and strategic infrastructure, or is integrated with the planned capacity of public services and infrastructure; and 6. promotes the efficient use of energy and water. 	Support in part	<p>The Ministry supports the proposed changes to UFD-P1 to ensure new urban development is integrated with the planned capacity of infrastructure to service growth. Educational facilities are an essential component of social infrastructure that is required to support the needs and demand of growing communities. The existing definition of 'infrastructure' used in UFD-P1 does not include social infrastructure.</p> <p>Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure' (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). Educational facilities should therefore be enabled in the Operative District Plan to service the growth that PCC2 will enable. The Ministry request the following relief.</p> <p>A definition of 'additional infrastructure' should subsequently be included in the definitions chapter under the NPS-UD.</p>	<p>Growth Management</p> <p>New urban <i>development</i> for residential activities will only be located within <i>existing urban areas</i> and <i>identified growth areas</i>, and will be undertaken in a manner which:</p> <ol style="list-style-type: none"> 1. supports the District's consolidated urban form; 2. maintains the integrity of the urban edge north of Waikanae and Ōtaki; 3. manages residential densities by: <ul style="list-style-type: none"> a. enabling medium density housing and focused infill housing in identified precinct areas that are close to centres, public open spaces, and public transport nodes; b. retaining a predominantly low residential density in the Residential Zones; c. avoiding any significant adverse effects of subdivision and development in special character areas identified in GRZ-P3; <u>a. providing for a variety of housing types and densities in the General Residential Zone;</u> <u>b. enabling increased housing densities:</u> <ol style="list-style-type: none"> <u>i. in, and within a walkable catchment of the Metropolitan Centre Zone;</u> <u>ii. within a walkable catchment of the train stations at Paekākāriki, Paraparaumu and Waikanae; and</u> <u>iii. in and adjacent to the Town Centre Zone and Local Centre Zone;</u> 4. avoids urban expansion that would compromise the distinctiveness of existing settlements and unique character values in the rural <i>environment</i> between and around settlements; 5. can be sustained within and makes efficient use of existing capacity of public services and strategic infrastructure, or is integrated with the planned capacity of public services, <u>and infrastructure and additional infrastructure;</u> and 6. promotes the efficient use of energy and water.
3	UFD-P4	<p>Residential Density</p> <p>The density of <i>subdivision</i> and <i>development</i> will be managed through an area-specific approach to achieve an appropriate range of housing types across the District, as set out below:</p>	Support in part	<p>The Ministry supports the proposed changes to UFD-P4 to ensure new urban development is integrated with the planned capacity of infrastructure to service growth. Educational facilities are an essential component of social</p>	<p>Residential Density</p> <p>The density of <i>subdivision</i> and <i>development</i> will be managed through an area-specific approach to achieve an appropriate range of housing types across the District, as set out below:</p>

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/	Reason for Submission	Relief Sought (in red)
		<ol style="list-style-type: none"> 1. the highest densities, including apartments as part of mixed use developments, will be located within and in immediate proximity to centres; 2. medium density housing will be limited to specific precinct areas within walking distance of centres higher density <u>development, including multi-storey apartments, will be provided for within a walkable catchment of the Metropolitan Centre Zone, train stations at Paekākāriki, Paraparaumu and Waikanae, and adjacent to the Town Centre Zone and Local Centre Zone;</u> 3. focused infill will be encouraged in specific areas where there is good access to shops and services a variety of densities will be provided for in the General Residential Zone; 4. within the <i>Neighbourhood Development Areas</i> identified in the Ngārara Development Area Structure Plan in Appendix 7, the provision of affordable housing will be encouraged at appropriate locations with good access to <i>shops</i> and services; <u>and</u> 5. traditional low density residential subdivision will be allowed within the general residential area; 6. overall existing low densities will be maintained in special character areas identified in GRZP3; 7. especially low densities will be applied in Low Density Housing Precinct areas (identified on the District Plan Maps) as transitions between rural and urban environments); and <u>5. in areas where infrastructure constraints exist (such as water, wastewater or roading), densities will reflect those constraints residential densities will be integrated with existing or planned infrastructure capacity.</u> 		<p>infrastructure that is required to support the needs and demand of growing communities. The existing definition of 'infrastructure' used in UFD-P1 does not include social infrastructure.</p> <p>Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure' (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). Educational facilities should therefore be enabled in the Operative District Plan to service the growth that PCC2 will enable. The Ministry request the following relief.</p> <p>A definition of 'additional infrastructure' should subsequently be included in the definitions chapter under the NPS-UD.</p>	<ol style="list-style-type: none"> 1. the highest densities, including apartments as part of mixed use developments, will be located within and in immediate proximity to centres; 2. medium density housing will be limited to specific precinct areas within walking distance of centres higher density <u>development, including multi-storey apartments, will be provided for within a walkable catchment of the Metropolitan Centre Zone, train stations at Paekākāriki, Paraparaumu and Waikanae, and adjacent to the Town Centre Zone and Local Centre Zone;</u> 3. focused infill will be encouraged in specific areas where there is good access to shops and services a variety of densities will be provided for in the General Residential Zone; 4. within the <i>Neighbourhood Development Areas</i> identified in the Ngārara Development Area Structure Plan in Appendix 7, the provision of affordable housing will be encouraged at appropriate locations with good access to <i>shops</i> and services; <u>and</u> 5. traditional low density residential subdivision will be allowed within the general residential area; 6. overall existing low densities will be maintained in special character areas identified in GRZP3; 7. especially low densities will be applied in Low Density Housing Precinct areas (identified on the District Plan Maps) as transitions between rural and urban environments); and <u>5. in areas where infrastructure constraints exist (such as water, wastewater or roading), densities will reflect those constraints residential densities will be integrated with existing or planned infrastructure (including additional infrastructure) capacity.</u>

From: [Sian Stirling](#)
To: [Mailbox - District Planning](#)
Subject: RE: Ministry of education submission on Plan change 2
Date: Thursday, 15 September 2022 3:43:53 pm
Attachments: [Ministry of Education Submission - Kāpiti Coast -PPC2.pdf](#)

Hi again,

Disregard the below. Please find attached the Ministry of Education's submission on Plan Change 2.

The Ministry will not gain a trade advantage from this submission.

Please confirm receipt of this submission.

Ngā mihi,

Sian Stirling

Planner

Beca

Ph +64 9 300 9722

www.beca.com | igniteyourthinking.beca.com

From: Sian Stirling
Sent: Thursday, 15 September 2022 1:54 pm
To: district.planning@kapiticoast.govt.nz
Subject: Ministry of education submission on Plan change 2

Kia ora,

I am currently finalising a submission on the Proposed Plan Change 2 on behalf of the Ministry of Education. We are aware submissions will close at 5pm today. We kindly ask if we can submit our submission in the morning and if it would be accepted?

Ngā mihi,

Sian Stirling

Planner

Beca

Ph +64 9 300 9722

www.beca.com | igniteyourthinking.beca.com

NOTICE: This email, if it relates to a specific contract, is sent on behalf of the Beca company which entered into the contract. Please contact the sender if you are unsure of the contracting Beca company or visit our web page <http://www.beca.com> for further information on the Beca Group. If this email relates to a specific contract, by responding you agree that, regardless of its terms, this email and the response by you will be a valid communication for the purposes of that contract, and may bind the parties accordingly. This e-mail together with any attachments is confidential, may be subject to legal privilege and applicable privacy laws, and may contain proprietary information, including information protected by copyright. If you are not the intended recipient, please do not copy, use or disclose this e-mail; please notify us immediately by return e-mail and then delete this e-mail.

Sensitivity: General