



22 November 2019

Eden Edwardson
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Ministry of Education (Submission #267) - Letter to be tabled at the hearing for the Urban and Services Plan Changes 82 A & B, 88 A-J, 109 115, 136, 143, 144, 145, 147 & 148 to the Whangarei District Plan.

Attn: Eden Edwardson

The Ministry of Education (“the Ministry”) has opted not to attend the hearing set for 25th November – 6th December 2019, regarding the notified Urban and Services Plan Changes to the Whangarei District Plan. We request that this letter be tabled for the Hearing Panel’s consideration in lieu of attendance.

The Planning Officer’s reports for the proposed plan changes have been reviewed by the Ministry. These reports are correct in their summary of the Ministry’s submission points.

In its submission the Ministry supported the inclusion of educational facilities as permitted activities in the City Centre Zone, Mixed-use Zone, Waterfront Mixed-use Area Zone, Commercial zone, Local Commercial Zone, Shopping Centre Zone, Open Space Zones, Sport and Active Recreation Zone and Hospital Zone. The Planning Officer’s report recommends these rules are adopted as notified. The Ministry supports this recommendation.

The Ministry also supported the discretionary activity status given to educational facilities in the Neighbourhood Commercial Zone, Low Density Residential Zone and Conservation Zone, and the non-complying activity status given to educational facilities in the Waterfront Commercial Area Zone. There may be an occasional need for educational facilities to be located within these zones, however the non-complying activity status allows for education facilities to be assessed on a case by case basis, while achieving the desired outcomes for each particular zone.

In its submission the Ministry opposed the non-complying activity status given to educational facilities in the Light Industrial Zone and Heavy Industrial Zone. This is because certain educational facilities (such as work skills training centres) may appropriately be located in close proximity to the industry they relate to. The Ministry therefore considers that a non-complying activity status is too restrictive in these zones. The Ministry requested that Educational facilities in these zones be given a discretionary activity status. The Planning Officer agreed that it is appropriate to enable educational facilities directly associated with industrial activities in industrial zones, as this will support industrial activities, improve trade development and employment opportunities and contain potential effects within industrial zones. The Planning Officer recommends that the definition of General Industry be amended as detailed in Part 1, Attachment 1 of the Planning Officers report, as follows:

“General Industry means any industrial activity which is not manufacturing and storage, repair and maintenance services, artisan industrial activities, marine industry, waste management facilities, or a landfill. It includes any research laboratories used for scientific, industrial or medical research, or any training facilities for an industrial activity. This definition is included within the Industrial Activities definition grouping”.

The Planning Officer also recommends the insertion of a footnote to L1-R38 and HI-R30 identifying the relationship between Educational Facilities and General Industry as follows:

Note: Training facilities for an industrial activity are defined as General Industry

The Planning Officer also recommends the insertion of a new policy in both the Light Industrial and Heavy Industrial Zones (referenced as LIZ-PNEW3 and HIZ-NEWP1). Which will state the following:

LIZ-PNEW3: Educational Facilities: To manage non-industrial activities by providing for Educational Facilities within the Light Industrial Zone only where the Educational Facility is defined as General Industry



HIZ-NEWP1: Research and Training: To provide for research laboratories used for scientific, industrial or medical research, and training facilities where they are designed, located and managed to operate symbiotically with industrial activities.

The amendments to the wording in the Light and Heavy Industrial Zone chapters achieve the outcomes sought by the Ministry, being that educational facilities associated with industrial activities are provided for within these zones. The Ministry therefore supports the Planning Officers recommendations.

The Ministry opposed the non-complying activity status given to Educational Facilities in the Residential, Medium-density Residential, and High-density Residential Zone. This is because Educational facilities are best placed in close proximity to the residential areas and communities they serve. Residential zones are therefore often appropriate locations for educational facilities. The Ministry requested in its submission that Educational Facilities be given a discretionary activity status within the Residential Zones. This would enable the effects of proposed educational facilities in these zones to be assessed and appropriately managed within the residential environment. The Planning Officer supports the Ministry's request and recommends that the activity status for Educational Facilities in the Medium-density Residential, High Density Residential and Residential Zone is amended to be a discretionary activity. The Ministry supports this recommendation.

In its submission, the Ministry supported in part the Minimum on-site car and bicycle parking requirements outlined in TRA-Appendix 1 – Appendix 1A. The Ministry requested minor additions to the wording (as proposed) to align with its recent submissions on similar provisions across New Zealand, and to provide a more comprehensive solution to the management of traffic generation around education facilities. The Planning Officer supports the amendments proposed by the Ministry. The Ministry supports this recommendation.

The Ministry requested that the definition of 'Educational Facilities' be amended to reflect the Ministry for the Environment's National Planning Standards. This request was supported by Whangarei District Council in their submission (#236) which requested that the definition be amended to reflect the definition in the updated standards. The Planning Officer recommends that the definition should be updated to reflect the updated planning standards. The Ministry supports this recommendation.

In its submission, the Ministry noted that Whangarei District Council's proposed approach to allocating zoning to sites currently designated by the Minister of Education for Education Purposes is to align with the zoning of surrounding land. The Ministry supports this approach, as it enables the property to be subject to the most appropriate zoning rules for the surrounding environment if the designation were not to apply or eventually be uplifted for any reason. The Planning Officer acknowledged the Ministry's support for this approach and recommended no changes to the current zoning approach for schools. The Ministry supports this recommendation.

The Ministry requests that, if the Hearings Panel is of a mind to approve the plan change, that the plan change be approved with the inclusion of Rule CC-R21, MU-R19, WZ-R17, COM-R28, LC-R24, SCZ-R1, OS-R10, SAR-R13, SPH-R8, NC-R23, LDR-R18, CON-R16, LI-R38, HI-R30, LLRZ-R18, LDRZ-R-New2, GRZ-R-New5, MDRZ-R-New4, Policy LIZ-PNew3, HIZ-NewP1, TRA-P5, TRA-P9, TRA – Appendix 1A, TRA – Appendix 1D and the definition of Educational Facilities and General Industry as recommended in the Planning Officer's report.

The Ministry appreciates the opportunity to be involved in the plan change process, in the interests of effectively managing education property owned by the Crown.

Should you have any queries please contact myself as planning agent to the Ministry in this matter in the first instance.



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cc: *Jayne Taylor-Clarke – Ministry of Education Northern Region Infrastructure Manager*