



**Te Tāhuhu o  
te Mātauranga**  
Ministry of Education

28 March 2024

Hearings Commissioners

West Coast Regional Council – Council Chambers

Greymouth, 7805,

PO Box 66

**Ministry of Education - Te Tai o Poutini Plan (Combined District Plan) – Letter to be tabled at Hearing: Subdivision, Financial Contributions and Public Access**

The Ministry of Education (the Ministry) lodged a submission in relation to the Proposed Te Tai o Poutini Plan (Combined District Plan for the West Coast) (TTPP) on 3 November 2023.

The Ministry will not attend the hearing for Subdivision, Financial Contributions and Public Access scheduled to commence on 16 April 2024 and instead requests that this letter be tabled for the Hearing Panel's consideration in lieu of attendance.

Within the Ministry's submission, one amendment was sought to the Subdivision Chapter, objective SUB-O2, seeking that explicit consideration is given to educational activities when considering the locality and rate of subdivisions, to ensure that population growth and the impact on schools is considered within developments. The following amendment was sought (red font):

*Subdivision occurs in locations and at a rate that:*

- a. *Is supported by the capacity of infrastructure networks, or provides for infrastructure facilities and networks that are sufficient to accommodate growth and development that meets the standards required by the Council and the Plan;*
- b. *Facilitates the operation of critical infrastructure;*
- c. *Enables access and connectivity;*
- d. *Provide for the health, wellbeing and safety of the West Coast/Tai o Poutini community;*
- e. *Enables growth and development to be supported by educational facilities;*
- f. *Provides for growth and expansion of West Coast/Tai o Poutini settlements and businesses; and*
- g. *Avoids significant natural hazards and are built to be resilient to natural hazards.*

The s42A Officer's report for Hearing - Subdivision, Financial Contributions and Public Access (prepared by Briar Belgrave and Ruth Evans) has been reviewed. Ms Belgrave and Ms Evans have recommended that the Ministry's submission on SUB-O2 is rejected for the reasons below:

- *Subdivision in itself does not necessarily generate the need for a new school.*
- *The Ministry of Education can use the designation process to ensure that growth and development is supported by educational facilities.*

In response to Ms Belgrave and Ms Evans recommendation, it is the Ministry's experience that subdivisions for residential development, whether cumulatively across several small subdivisions, infilling or large-scale developments, increase the population (including that of school age children) in the area within which these subdivisions occur. This incremental increase may result in an increase in the number of students at existing schools or create the need for education facilities in areas not currently provided for. To ensure that the district has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural well-being, the Ministry seeks the amendment SUB-O2(e). I

Whilst SUB-O2(d) could be considered to implicitly provide for the consideration of the need for educational facilities through 'wellbeing', the Ministry seeks to ensure the Proposed Plan enables consideration of the educational needs of a community when assessing the locality and rate of subdivisions across the West Coast region by including the sought amendment to SUB-O2(e).

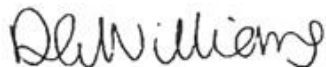
Furthermore, the Ministry acknowledge that designations are a pathway that can be utilised as and when a school is required however that does not negate the need for District Plans to enable well-functioning communities adequately and appropriately through the plan provisions. Enabling provisions for educational facilities are an important tool that supports the Ministry's Notice of Requirement process to establish new schools.

Should the proposed amendment not be accepted, an alternative and less overt amendment could read as follows: *Subdivision occurs in locations and at a rate that:*

- a. *Is supported by the capacity of infrastructure networks, or provides for infrastructure facilities and networks that are sufficient to accommodate growth and development that meets the standards required by the Council and the Plan;*
- b. *Facilitates the operation of critical infrastructure;*
- c. *Enables access and connectivity;*
- d. *Provide for the health, wellbeing and safety of the West Coast/Tai o Poutini community;*
- e. *Considers the need for growth and development to be supported by educational facilities;*
- f. *Provides for growth and expansion of West Coast/Tai o Poutini settlements and businesses; and*
- g. *Avoids significant natural hazards and are built to be resilient to natural hazards.*

We respectfully request that the Panel considers the Ministry's requested amendment, or alternative amendment, for the reasons outlined above.

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



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