From: "Monique Way" <monique.way@woods.co.nz>
Sent: Mon, 24 Aug 2026 16:47:43 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Cc: "Emma Howie" <emma.howie@woods.co.nz>
Subject: Submission- Proposed Plan Change 4
Attachments: MoE Submission - PC4 South Waikato DP.pdf

Hi,

Please find attached our submission on Proposed Plan Change 4 to the South Waikato District Plan- Urban Growth.

Please let me know if you require anything further.

Kind regards,
Monique

Monique Way
Senior Intermediate Planner
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Te Tāhuhu o te Mātauranga
Ministry of Education

Submission on the South Waikato District Council – Proposed Plan Change 4.

To: South Waikato District Council

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

Address for service: C/- Woods

Attention: Emma Howie

Phone: [redacted]

Email: emma.howie@woods.co.nz

This is a submission on the Proposed South Waikato District Plan Change 4

Introduction/Background

The Ministry of Education Te Tāhuhu o Te Mātauranga (**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 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 Crown-owned State schools, this involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increasing demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Ministry is therefore a significant stakeholder in relation to planning provisions that may affect the operation and development of existing educational facilities, as well as the ability to establish new educational facilities to respond to future projected growth.

The Ministry's submission is:

The Ministry has a particular interest in the provisions of South Waikato District Council's Plan Change 4 - Urban Growth (**PC4**) that may affect the existing and future provision of educational facilities within the District.

The purpose of PC4 is to amend the District Plan to implement the rezoning of additional land for urban growth, with supporting provisions. PC4 seeks to ensure there is sufficient residential, commercial and industrial land available in the District through to 2054, while also identifying Future Urban Zones to provide flexibility for longer-term growth. The Ministry supports the strategic planning of Tīrau, Putāruru and Tokoroa to accommodate anticipated population and residential growth. As residential communities grow, it is important that the planning framework also enables the social infrastructure required to support those communities, including schools and other educational facilities.

Educational facilities are recognised as additional infrastructure under both the National Policy Statement on Urban Development 2020 (**NPS-UD**) and the National Policy Statement for Infrastructure 2025 (**NPS-I**), reflecting their role in supporting existing and growing communities. These national directions recognise the need to integrate land use and infrastructure planning, with the NPS-UD specifically requiring local authorities to be satisfied that the additional infrastructure required to service development capacity is likely to be available. For PC4, this means residential growth should be planned alongside the educational facilities required to support that growth.

The Ministry has considered the capacity and anticipated needs of the existing education network in the South Waikato District. Current network planning indicates that anticipated growth in Tokoroa, and at primary level in Putāruru, can generally be accommodated within the existing network. Putāruru College is operating at or near capacity and the

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Ministry is monitoring future growth pressures. The Ministry is also experiencing increased demand for Māori-medium education and anticipates further investment at existing wharekura sites.

While the Ministry is not currently identifying a need for new school sites as a direct result of PC4, it seeks a planning framework that recognises educational facilities as an important component of growing residential communities and enables the education network to respond to changing population and roll growth over the long term. This includes enabling the development and expansion of existing educational facilities, as well as providing sufficient flexibility to respond to future network needs.

The Ministry's submission therefore seeks to ensure that the objectives, policies and rules introduced through PC4 appropriately recognise and provide for educational facilities and do not create unnecessary barriers to establishing or developing educational facilities within identified growth areas.

While the Minister of Education, as a requiring authority, has the ability to designate land for new schools, it remains important that the District Plan provides a framework that recognises and plans for the infrastructure needs associated with urban growth. A planning framework that enables educational facilities within growth areas supports integrated land use and infrastructure planning and can also assist any future designation process by ensuring that the need for education infrastructure has already been recognised through the planning framework for those areas.

The Ministry's submission relates to the following chapters and provisions of PC4:

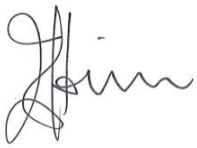
- **Chapter 6 - Matters of Strategic Direction**, particularly the Urban Form and Development objectives and policies;
- **Chapter 7.3 - Transport**, as the provisions relate to connectivity and access to existing and future educational facilities;
- **Chapter 8.3 - Natural Hazards**, as the provisions affect the location and development of educational facilities within growth areas;
- **Chapter 12 – General District Wide Matters**, particularly the assessment criteria applying to development within District Growth Cells.
- **Chapter 13.1 - General Residential Zone**, including the objectives, policies and activity status applying to educational facilities; and
- **Chapter 14 - Special Purpose Zones: Future Urban Zone**, including the objectives, policies, rules and standards applying to educational facilities.

The Ministry's specific submission points, reasons and relief sought in relation to these provisions are set out in **Table 1** below.

The Ministry seeks the following from the South Waikato District Council:

That the requested amendments, additions **and retentions** to the District Plan, as set out in **Table 1** to this submission, be accepted, together with any consequential amendments required to give effect to that relief.

The Ministry also requests the opportunity to be heard in support of this submission.



Emma Howie
(Signature of person authorised to sign on behalf of the Ministry of Education)
Date: 24 August 2026

Table 1: Plan Change 4 – Urban Growth: Ministry of Education Submission on Notified Provisions

ID	Section of the Proposed District Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought The relief sought is shown in red underscore for additions and ~~red strikethrough~~ for deletions.
[document 01] 3. Interpretation					
3.1 Definitions					
	Habitable Room: means any room used for the purposes of teaching or used as a living room, dining room, sitting room, bedroom, office or other room specified in the Plan to be a similarly occupied room. **(National Planning Standard definition)**		Support	The Ministry supports the definition of 'habitable room' as proposed as it is consistent with the National Planning Standard.	Retain as proposed.
[document 02] 6. Matters of Strategic Direction					
Objectives					
	UFD-O3	UFD-O3 Ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place, including ensuring that sufficient water is available to support future planned growth.	Support in part with changes requested	The Ministry supports UFD-O3 in part as it seeks to coordinate new development with the infrastructure necessary to service growth. The Ministry seeks amendment to ensure that planning for growth also considers additional infrastructure, including educational facilities, which is necessary to support the communities resulting from that growth.	The Ministry seeks the following amendment to the provision: UFD-O3 Ensure new development does not occur until provision for appropriate infrastructure and additional infrastructure, including educational facilities, necessary to service the development is in place, including ensuring that sufficient water is available to support future planned growth.
Policies					
	UFD-P4	UFD-P4 Ensure that where new infrastructure is provided by the private sector, it does not compromise the function of existing, or the planned provision of, infrastructure provided by central, regional and local government agencies.	Support	The Ministry supports UFD-P4 as it recognises the importance of ensuring that the planned provision of infrastructure by central government agencies is not compromised by privately provided infrastructure.	Retain as proposed.
[document 04] 7.3 - TRAN Transport					
TRAN - Transport					
	TRAN-P1	TRAN-P1 Promote affordable, safe, integrated, sustainable and responsive transport networks within and through the towns, with safe pedestrian and cycleway connections linking residential neighbourhoods with public reserves, schools and the town centres, and pedestrian and cycle prioritised main streets which provide an inviting, safe, legible and memorable experience in the town centres.	Support	The Ministry supports TRAN-P1 as it expressly recognises the importance of providing safe pedestrian and cycle connections between residential neighbourhoods and schools. This supports the integration of educational facilities within existing and growing communities and provides for safe and accessible travel to schools.	Retain as proposed.
	TRAN-P15	TRAN-P15	Support	The Ministry supports TRAN-P15 as it provides for integrated transport planning within District Growth Cells and Future Urban Zones, including walking, cycling and	Retain as proposed.

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		Changes to the transport network in the District's Growth Cells and Future Urban Zones shall: a) achieve connectivity by linking to existing networks, including cycleways, walkways, public transport routes and open space networks. b) ensure the appropriate design, number and location of access points is achieved. c) fully consider opportunities for alternative or additional access points and/or routes. d) generate a type or level of traffic that is compatible with the function of the transport corridor they obtain access to and from. e) ensure the location and layout of activities integrate with existing and future transport corridors. f) avoid new rail level crossings; and support low impact urban design principles.		public transport connectivity and appropriate access arrangements. These provisions will assist in ensuring that educational facilities can be safely and efficiently integrated into future residential communities.	
[document 06] 8.3 NH Natural Hazards					
NH – Natural Hazards					
	NH-P4	Manage flooding risk to people and property by requiring compliance with minimum floor levels and setbacks. Where compliance cannot be achieved, other risk reduction options must be assessed and implemented.	Support	The Ministry supports NH-P4 as it provides for the appropriate management of flood risk to people, property and infrastructure, including educational facilities and their occupants.	Retain as proposed.
	NH-P5	On land that is potentially prone to liquefaction, before new subdivision or development occurs, require an assessment by a geo-professional that reflects the type and scale of the activity, its overall vulnerability to the effects of liquefaction and the appropriate mitigation measures needed to reduce risk to an acceptable level.	Support	The Ministry supports NH-P5 as it requires liquefaction risk to be appropriately assessed and managed before new subdivision or development occurs, including where future educational facilities may be established.	Retain as proposed.
NH Rules					
	NH-R1	NH-R1 PER Activities ~~GRZ-PREC1-Putaruru and PREC3-Tokoroa~~ GRZ, COMZ and MU-SETZ (1) Outside of a high risk flood zone, tThe floor level of any ~~habitable~~ building with a habitable room shall be at least 0.5m above the 1% design flood level (2) All buildings shall be set back at least 25m from the edge of any river. Activities that cannot comply with NH-R1 are discretionary activities	Support	The Ministry supports NH-R1, acknowledging the importance of appropriately managing flood risk to educational facilities and their occupants.	Retain as proposed.
	NH-R2	NH-R2 PER Activities GRUZ~~, and~~ RLZ, TCZ, NCZ, FUZ and the District Growth Cells	Support	The Ministry supports NH-R2 as it extends the flood management requirements to the Future Urban Zone and District Growth Cells. Educational facilities include habitable rooms under the proposed definition and are therefore directly affected by these provisions. The Ministry supports	Retain as proposed.

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		(1) Outside of a high risk flood zone, t~~T~~he floor level of any ~~habitable~~ building with a habitable room shall be at least 0.5 metres above the 1% design flood level. (2) All buildings shall be set back at least 25 metres from the edge of any river, except for necessary utility structures such as pump sheds and water intake structures. Activities that cannot comply with NH-R2 are discretionary activities		an approach that appropriately manages natural hazard risk to students, staff and education assets.	
	NH-R4	NH-R4- DIS Activities All zones (1) Any earthworks undertaken fully or partially within a high risk flood zone (2) Any building located fully or partially within a high risk flood zone provided it does not contain a habitable room Activities that cannot comply with NH-R4(2) are non-complying activities	Support	The Ministry supports NH-R4, acknowledging the importance of appropriately managing flood risk to educational facilities and their occupants within high-risk flood zones.	Retain as proposed.
[document 09] 12.1 – General District Wide Matters AA All Activities					
AA-R4 – Assessment Criteria for Discretionary Acitivities					
	R4(4)	R4(4) Activities within a District Growth Cell (a) In assessing applications for subdivisions or land use activities within a District Growth Cell as shown on the planning maps that do not comply with SUB-R5(1)(f) to (n), GIZ-R5(7) or GRZ-R6(1) to (9), relating to the maximum number of HUEs to be provided for in these Growth Cells, as a guide only, the assessment matters are: (i) The availability of sufficient water and wastewater infrastructure including water supply for firefighting in accordance with the NZ Fire Fighting Water Supplies Code of Practice (SNZ PAS 4509:2008), to service future subdivision and/or development throughout Tirau, Putaruru, and Tokoroa, including in the Growth Cells identified by this Plan. (ii) The feasibility of alternative measures to achieve required public wastewater and or water supply capacity, (iii) Whether the staging and design of development will align with the provision of infrastructure so that the overall capacity of the infrastructure is not exceeded. (iv) Whether temporary wastewater or water supply capacity can be provided which does not undermine the long-term solution.	Support in part with changes requested	The Ministry seeks amendment to R4(4) to ensure that the assessment of development within District Growth Cells considers the availability and timing of additional infrastructure, including educational facilities, alongside water and wastewater infrastructure. Educational facilities are not included within the District Plan definition of infrastructure, but are recognised as additional infrastructure under the National Policy Statement on Urban Development. As growth cells are developed, it is important that the planning framework considers not only the capacity of core network infrastructure, but also the social infrastructure required to support the resulting communities. Including additional infrastructure within the assessment matters will support more integrated and coordinated land use and infrastructure planning and ensure that future education needs can be considered as growth occurs.	R4(4) Activities within a District Growth Cell (a) In assessing applications for subdivisions or land use activities within a District Growth Cell as shown on the planning maps that do not comply with SUB-R5(1)(f) to (n), GIZ-R5(7) or GRZ-R6(1) to (9), relating to the maximum number of HUEs to be provided for in these Growth Cells, as a guide only, the assessment matters are: (i) The availability of sufficient water and wastewater infrastructure including water supply for firefighting in accordance with the NZ Fire Fighting Water Supplies Code of Practice (SNZ PAS 4509:2008), to service future subdivision and/or development throughout Tirau, Putaruru, and Tokoroa, including in the Growth Cells identified by this Plan. (ii) The feasibility of alternative measures to achieve required public wastewater and or water supply capacity, (iii) Whether the staging and design of development will align with the provision of infrastructure and additional infrastructure so that the overall capacity of the infrastructure is not exceeded and the infrastructure required to support the growth can be provided in a timely and coordinated matter.

ID	Section of the Proposed District Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought The relief sought is shown in red underscore for additions and ~~red strikethrough~~ for deletions.
		(v) Whether funding or other such measures have been agreed between the Council as service provider and the applicant to achieve the required public wastewater and or water supply capacity. (vi) Means to mitigate effects of the additional demand for water supply and/or wastewater disposal capacity upon the relationship of mana whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.			(iv) Whether temporary wastewater or water supply capacity can be provided which does not undermine the long-term solution. (v) Whether funding or other such measures have been agreed between the Council as service provider and the applicant to achieve the required public wastewater and or water supply capacity. (vi) Means to mitigate effects of the additional demand for water supply and/or wastewater disposal capacity upon the relationship of mana whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.
[document 14] 13.1 – GRZ General Residential Zone					
GRZ – General Residential Zone					
	GRZ-O2 to GRZ-O6	Objectives addressing greenfield expansion, integrated land use and infrastructure, recreation and open space, staged development and natural hazards.	Support in part with changes requested	The Ministry seeks the inclusion of a specific objective recognising educational facilities as an anticipated component of residential neighbourhoods. While the General Residential Zone introduction recognises educational facilities as activities that meet community needs, this is not carried through into the objectives. As residential areas grow, the planning framework should recognise the role of educational facilities in supporting those communities.	The Ministry seeks the inclusion of the following new objective: GRZ-O7 Educational Facilities Educational facilities are provided for as an integral part of residential neighbourhoods to support the social and educational needs of existing and future communities.
	GRZ-P4 to GRZ-P9	Policies addressing residential intensification, amenity, connectivity, infrastructure and development of Residential Growth Cells.	Support in part with changes requested	The Ministry seeks the inclusion of a policy that expressly enables educational facilities within the General Residential Zone. Educational facilities are an anticipated component of residential communities and should have an enabling policy framework where their location, scale and design are compatible with the surrounding environment.	The Ministry seeks the following new policy: GRZ-P10 Educational Facilities Provide for educational facilities where they support the social and educational needs of the community and are of a location, scale and design that is compatible with the character and amenity values of the surrounding residential area.
GRZ-R3 DIS Activities					
	GRZ-R3(12)	Educational facilities are a discretionary activity where the permitted activity requirements are not met.	Oppose in part / amendment sought	The Ministry seeks amendment to the activity status applying to educational facilities that exceed the permitted activity threshold in GRZ-R1(8). A full discretionary activity status is unnecessarily restrictive for an activity that is anticipated within residential communities. Providing for educational facilities as a Restricted Discretionary activity would enable their establishment and expansion while retaining Council's ability to assess relevant site-specific effects. The Ministry considers GRZ-R8 provides an appropriate assessment framework for this purpose.	The Ministry seeks deletion of educational facilities from GRZ-R3(12) and their inclusion as a Restricted Discretionary activity under GRZ-R2 as follows: The Ministry seeks the following amendment: GRZ-R2 RDIS Activities Educational facilities that do not comply with the permitted activity threshold in GRZ-R1(8).
GRZ-R8 Matters of Discretion					
	GRZ-R8	Matters of discretion applying to Restricted Discretionary activities, including amenity, traffic, parking, access, landscaping, infrastructure capacity and built form.	Support	The Ministry supports GRZ-R8 as the matters of discretion provide an appropriate framework for assessing the potential effects of educational facilities as a Restricted Discretionary activity.	Retain as proposed.

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[document 17] 14 Special Purpose Zones					
14.1 – FUZ – Future Urban Zone					
	FUZ-O1 to FUZ-O3	Objectives providing for future growth, protecting future development potential and achieving timely, planned development with coordinated infrastructure provision. FUZ-O3 The development of land occurs in a timely and planned manner to achieve high quality urban form and coordinated infrastructure provision.	Support in part with changes requested	The Ministry supports the Future Urban Zone objectives in part. The Ministry seeks amendment to FUZ-O3 to recognise that coordinated planning for future residential growth should also provide for the social infrastructure required to support future communities, including educational facilities.	The Ministry seeks the following amendment to the objective: FUZ-O3 The development of land occurs in a timely and planned manner to achieve high quality urban form and coordinated infrastructure provision including provision for anticipated community needs and educational facilities where the intended future use is residential.
	FUZ-P1 to FUZ-P3	Policies enabling appropriate interim rural activities and protecting the future urban development potential of land.	Support in part with changes requested	The Ministry seeks the inclusion of a policy that expressly recognises anticipated community and education infrastructure when planning land intended for future residential use. This will help ensure that subdivision, use and development does not compromise the ability to provide educational facilities as future communities develop.	The Ministry seeks the inclusion of the following new policy: FUZ-P4 Where the intended future use is residential, provide for anticipated community needs, including educational facilities, and ensure that the future provision of appropriately located and serviced educational facilities is not compromised by subdivision, use or development.
Rules					
	FUZ-R1(8)	(8) Educational facility The activities are permitted where: a) the standards in FUZ-R4(1) to (6) and FUZ-R5 are complied with b) Services shall be provided for no more than 8 persons at any one time (excluding staff) Activity status where compliance is not achieved: **RDIS**	Support	The Ministry supports FUZ-R1(8) as it provides for educational facilities as a permitted activity at a small scale, with a Restricted Discretionary activity pathway where the permitted activity threshold or applicable standards are not met. The Ministry supports this approach as it provides an appropriate and proportionate consenting pathway for the establishment and development of educational facilities within the Future Urban Zone, while enabling relevant site-specific effects to be assessed.	Retain as proposed.
	FUZ-R2	(1) Marae development and papakāinga in Residential FUZ Matters of discretion a) AA-R3(1), AA-R3(2) b) The potential impact of the development on traffic safety and efficiency c) The effect of any educational and employment activities on the amenity values of nearby properties d) the requirement for infrastructure and whether servicing demand will exceed available capacities or will affect the planned provision of infrastructure for the future subdivision, use or development of the site for urban purposes e) The ability for access to the development to fit with an integrated design as part of the future residential neighbourhood.	Support	The Ministry supports FUZ-R2 as the matters of discretion expressly recognise educational activities within the Residential Future Urban Zone. The Ministry supports this recognition of education as an anticipated component of future residential communities.	Retain as proposed.
Other Methods					

ID	Section of the Proposed District Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought The relief sought is shown in red underscore for additions and ~~red strikethrough~~ for deletions.
	FUZ-M1	FUZ-M1 Development Area Plans are required to identify the full infrastructure needs that are applicable to that future urban zone. A Development Area Plan must be prepared before residential or industrial/commercial re-zoning occurs in: 1. Tirau Residential Future Urban Zone (Parapara Road West) 2. Putaruru Residential Future Urban Zone (between Totara St and Putaruru Golf Course). 3. Putaruru Commercial Future Urban Zone (adjoins Putaruru Growth Cell 4). 4. Tokoroa Residential Future Urban Zone 1 (234 and 242 Maraetai Rd) 5. Tokoroa Residential Future Urban Zone 2 (between Cullen Cres and Paraonui Rd) 6. Tirau Industrial Future Urban Zone (State Highway 27), noting a Development Area Plan has been prepared as set out below, but may require updating if components of the plan are proposed to be altered.	Support in part with changes requested	The Ministry supports the use of Development Area Plans to coordinate the future development of Future Urban Zones. The Ministry seeks amendment to ensure that, where the anticipated future use is residential, the Development Area Plan process considers the additional infrastructure required to support the resulting community, including educational facilities. Early consideration of education infrastructure will support integrated planning and provide the Ministry with an opportunity to identify and plan for any future network requirements before development patterns become established.	The Ministry seeks the following amendment to the provision: FUZ-M1 Development Area Plans are required to identify the full infrastructure needs and additional infrastructure needs, including educational facilities where the intended future use is residential, that are applicable to that future urban zone. A Development Area Plan must be prepared before residential or industrial/commercial re-zoning occurs in: 1. Tīrau Residential Future Urban Zone (Parapara Road West) 2. Putāruru Residential Future Urban Zone (between Totara St and Putāruru Golf Course) 3. Putāruru Commercial Future Urban Zone (adjoins Putāruru Growth Cell 4) 4. Tokoroa Residential Future Urban Zone 1 (234 and 242 Maraetai Rd) 5. Tokoroa Residential Future Urban Zone 2 (between Cullen Cres and Paraonui Rd) 6. Tīrau Industrial Future Urban Zone (State Highway 27), noting a Development Area Plan has been prepared as set out below, but may require updating if components of the plan are proposed to be altered.