



South Waikato District Council
Torphin Crescent
Tokoroa 3240

29 September 2020

Email: julie.cathie@southwaikato.govt.nz

Attention: Hearing Commissioners

Dear Commissioners

Ministry of Education – Letter to be tabled at the Hearing for Proposed District Plan Change 1 — Putaruru Urban Growth and Proposed Plan Change 2— Infrastructure Management

The Ministry of Education (the Ministry) has lodged a submission on Plan Change 1 —Putaruru Urban Growth and Plan Change 2 —Infrastructure Management. The Ministry has opted not to attend the Hearing scheduled to commence Wednesday 14th October 2020 and requests that in lieu of attendance this letter be tabled for the Hearing Commissioners’ consideration.

The s42A Reporting Officer’s (the Officer’s) reports for Hearing for Proposed District Plan Change 1 — Putaruru Urban Growth and Proposed Plan Change 2— Infrastructure Management have been received. The Ministry’s response to the Officer’s report recommendations on the Ministry’s submission points are set out below.

General Submission Matters

The relief sought by the Ministry’s submission is that Council consider the need for safe transport routes and access to and from schools from the new growth cells, including infrastructure to support the schools. Of particular concern is the locality and proximity of Growth Cell 1 to Te Wharekura o Te Kaokaoroa o Patetere (Te Wharekura) and the rail network.

The Ministry has reviewed the Level Crossing Safety Impact Assessment (LCSIA) commissioned by Council in response to Submission 4.1 from KiwiRail and notes the recommended pedestrian crossing improvements to manage and direct pedestrian crossing behaviours and to provide the necessary level of safety for children using the Main Street pedestrian crossings on their way to and from school.

The Officer has indicated that safety issues resulting from pupils taking an illegal shortcut across the railway directly to Te Wharekura can be expected to increase as Growth Cell 1 develops. The Officer notes that it was not within the scope of the LCSIA to consider the potential for trespass on the railway corridor as a short cut between Overdale Road, Growth Cell 1 and Te Wharekura. The Officer has indicated that possible responses to this issue are likely to include better barrier fencing, and perhaps a properly designed pedestrian crossing to the end of Buckland Street. The Officer has further indicated that the need for the latter will depend on the speed of growth and will have to be justified at the time under KiwiRail guidelines.

The Ministry considers that the LCSIA appropriately addresses the Ministry’s concerns at this point in time and appreciate that Council have recommended that pedestrian crossing improvements are required as the Growth Cell 1 develops. The Ministry requests that this matter is monitored closely as Putaruru grows and that the appropriate pedestrian crossing improvements are implemented accordingly.

Relevant to the above, the Ministry sought in its submission that Council engage with the Ministry regularly as Growth Cells develop, to enable the Ministry to keep up to date with staging, in case school network issues arise.

The Officer considers this a valid point which should be formally noted, however no amendments to the Plan Change document are required in response to this submission. This is supported by the Ministry.

Plan Change 1: Change A - Amendments to Objectives and Policies

Change A1 - Amend Objective 4.2.7

The Ministry supports the proposed amendment to Objective 4.2.7. Ensuring the efficient provision of infrastructure for new growth areas is important, particularly in terms of the provision for cycling and pedestrians as the townships expand outwards.

The Officer has recommended that the Ministry's submission be accepted. This is supported by the Ministry.

Change A2 - Add new Objective 4.2.10

The Ministry supports new Objective 4.2.10 to the extent that it seeks to ensure that new urban development is efficiently serviced and integrated to mitigate adverse effects on existing network utilities and infrastructure.

The Officer has recommended that the Ministry's submission be accepted in part, subject to amendments sought by Fire and Emergency New Zealand. This is supported by the Ministry.

Change A5 - Add a new Policy 4.3.18

The Ministry supports new Policy 4.3.18 as it requires land within the Putāruru Growth Cells not be developed for urban use until the provision of network utilities and infrastructure to service the land is secured through private developer agreements or other appropriate legal mechanisms. It is important that developments are appropriately serviced, and safe transport routes and access to and from schools including infrastructure to support the schools are provided for.

The Officer has recommended that the Ministry's submission be accepted. This is supported by the Ministry.

Change A6 - Add a new Policy 4.3.19

The Ministry supports new Policy 4.3.19 as it requires each Putāruru Growth Cell to be developed and serviced to provide sufficient capacity in network utilities and infrastructure for the scale and density of residential and or business development anticipated for the entire Growth Cell. It is important that developments are appropriately serviced, and safe transport routes and access to and from schools including infrastructure to support schools is provided for.

The Officer has recommended that the Ministry's submission be accepted. This is supported by the Ministry.

Change A9 - Add new Policy 4.3.20

The Ministry supports new Policy 4.3.20 as it ensures that new subdivisions within Putāruru Growth Cells do not compromise their efficient servicing, or their integration with the existing urban area as new neighbourhoods. It is important that Council ensure that the new growth cells integrate with the existing

areas to ensure safe transport routes and access to and from schools including infrastructure to support the schools are provided for.

The Officer has recommended that the Ministry's submission be accepted. This is supported by the Ministry.

Change A11 - Add new fifth bullet point to 4.4.1 District Plan Methods

The Ministry supports the addition of a fifth new bullet point to 4.1.1 methods that implement the objectives and policies above.

The Ministry supports the provision for specific rules for Putāruru Growth Cells, specifically rules that relate to water and wastewater limitations and those that promote integration of growth areas with the town's existing neighbourhoods and with network utilities and infrastructure.

The Officer has recommended that the Ministry's submission be accepted. This is supported by the Ministry.

Plan Change 1: Change B - Amendments to District Rules

Changes B1, B2, B4, B5, B6, B21 - Add new Rules 8.1.3(b), 8.3.1(j), 8.3.3(t), 8.3.3(ae), 8.3.3(u) and new Performance Standard 22.4.12

The Ministry have sought that the above rules be retained as notified.

The Officer has recommended that Rules 8.1.3(b), 8.3.1(j), 8.3.3(t) and 8.3.3(u) be retained, subject to a wording change to accommodate changes sought by submissions from Fire and Emergency New Zealand and that the Ministry's submission should be accepted to this extent. This is supported by the Ministry.

The Officer has recommended Rule 8.3.3(ae) and new Performance Standard 22.4.12 be retained in full and that the Ministry's submission be accepted. This is supported by the Ministry.

Plan Change 2: Change D - Amendments to District Rules

Given the drought which most of the country experienced this year (and will continue to be a problem, particularly for rural areas in the future), the Ministry is concerned at the potential impacts on water access and the ability of the sewerage system to cope with the added growth pressure. The Ministry is mindful of this issue as some schools had to close this year due to lack of water. As the water and wastewater systems are already under pressure, the Ministry supports any measures proposed to ensure that the water and sewer networks are able to cope with any additional water takes and wastewater discharges, while still providing the required level of service to the rest of the district.

Change A1 – Amend Policy 3.4.2

The Ministry supports the amendment to Policy 3.4.2 as it seeks to manage the demand for the supply and discharge of water to keep within Council's consented limits.

The Officer has recommended that the Ministry's submission be accepted. This is supported by the Ministry.

Change C2 – Add the following sentence to Assessment Criteria 8.3.4(r)

The Ministry supports the addition of the new assessment criteria to 8.3.4 as it requires the consideration of the cumulative effects of an activity on infrastructure, including the extent to which levels of service to zoned land and Council's compliance with existing water take or wastewater discharge consents may be impacted.

The Officer has recommended that the Ministry's submission be accepted. This is supported by the Ministry.

Changes D1, D2, D3 - Add new performance standards 18.4.13, 22.4.12, 27.4.13

The Ministry supports the addition of the new performance standards 18.4.13, 22.4.12 and 27.4.13 as they together seek to manage new water takes and wastewater discharges. The Ministry supports any measures proposed to ensure that the water and sewer networks are able to cope with any additional water takes and wastewater discharges, while still providing the required level of service to the rest of the district.

The Officer has recommended that the Ministry's submissions be accepted in part, subject to amendments sought by Fire and Emergency New Zealand. This is supported by the Ministry.

Should you have any queries or seek clarification on the above, please contact me on the details below.

Yours sincerely



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Planner

on behalf of

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