



Far North District Council
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24 May 2024

Sent via email to Alicia-Kate Taihia at alicia-kate.taihia@fndc.govt.nz

Attention: Hearing Commissioners for Far North Proposed District Plan Hearing 1

Ministry of Education – Letter to be Tabled at the Far North Proposed District Plan Hearing 1: Introduction, General Provisions.

The Ministry of Education (the Ministry) lodged a submission on the Far North Proposed District Plan (FNPDP) on 21 October 2022. The Ministry will not attend the hearing for the Introduction and General Provisions chapters which are scheduled to commence on 27 May 2024 and instead requests that this letter be tabled for the Hearing Panel's consideration in lieu of attendance.

Within the Ministry's submission, the Ministry sought an amendment to the Urban form and development chapter, objective SD-UFD-O3, seeking the inclusion of 'additional infrastructure' as this includes educational facilities. Educational facilities are a crucial form of additional infrastructure that is needed to support development. The Ministry also requested additional amendments to SD-UFD-O3 to focus on community development and employment activities. The following amendment was sought (underlined in red):

There is adequate development infrastructure (including additional infrastructure) in place or planned to meet the anticipated demands for community development including the provision of housing and business employment activities.

The Ministry also sought an amendment to the Infrastructure and electricity chapter, objective SD-IE-O3, seeking for the inclusion of 'additional infrastructure'. The following amendment was sought (underlined in red):

The benefits of infrastructure (including additional infrastructure) and renewable electricity generation activities across the district are recognised and provided for, while ensuring their adverse effects are managed.

The s42A Reporting Officer's report for Hearing 1 – Strategic Direction (prepared by Tammy Wooster) has been reviewed. Ms Wooster has recommended that the Ministry's submission points on objectives SD-UFD-O3 and SD-IE-O3 are accepted in part for the reasons below:

Ms Wooster considered it to be appropriate to include 'additional infrastructure' in objective SD-UFD-O3 for the following reasons:

- *The definition of infrastructure in the PDP is limited to that of the RMA;*
- *The inclusion of "additional infrastructure" in this objective is consistent with the definitions from the National Policy Statement on Urban Development 20202 (NPS UD).*

Ms. Wooster did not support the proposed amendment to include 'additional infrastructure' in objective SD-IE-O1 for the following reasons:

- *The infrastructure and electricity strategic objectives use the term infrastructure generally and apply the definition of infrastructure as per the RMA.*

- *This objective only applies to infrastructure as per the content in the infrastructure chapter of the PDP.*
- *Additional infrastructure is addressed in the urban form and development and social and economic strategic objectives, where [Ms. Wooster] has recommended SD-UFD-O3 include additional infrastructure.*

The Ministry are strongly supportive of the Reporting Officer's recommendation to include reference to '*additional infrastructure*' for the reasons set out in the submission.

While the Reporting Officer's recommendation is to reject the inclusion of '*additional infrastructure*' in objective SD-IE-O1, the Ministry acknowledges that it has been referenced in the overarching strategic provisions in SD-UFD-O3.

The inclusion of additional infrastructure is important as it includes social infrastructure, such as schools. It is vital that enabling provisions reference the establishment for educational facilities in areas not already provided for. While the Ministry acknowledges that designations are a pathway that can be utilised as and when a school is required, that does not negate the need for District Plans to enable well-functioning communities 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. This is because territorial authorities, when considering a requirement and any submissions received, must consider the effects on the environment of allowing the requirement, having particular regard to any relevant provisions of a plan or proposed plan.

Therefore, the Ministry supports the Officer's amendment to reference '*additional infrastructure*' in objective SD-UFD-O3.

The Ministry confirms that if the amendment in objective SD-UFD-O3 is retained as recommended by the Officer, the Ministry's submission points are adequately resolved.

Please contact the undersigned on behalf of the Ministry if you have any questions or require further clarification.



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