



FORM 5

**Submission on a publicly notified proposal for policy statement or plan, change or variation
under Clause 6 of Schedule 1, Resource Management Act 1991**

To: Waipā District Council

Name of submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for service: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Attention: Eden Rima

Phone: [REDACTED]

Email: [REDACTED]

This is a submission on the Plan Change 37 (Private) – Rider Park Structure Plan

The specific parts of the proposal that the Ministry of Education's submission relates to are:

This is a submission on Waipā District Council's Plan Change 37 (PC37) a private Plan Change prepared by Milan Park Stud Limited (the Applicants) submitted to Waipā District Council (WDC), which seeks to rezone Deferred Residential and Rural land to Medium Density Residential Zone (MDRZ) at 37, 85 and 97 Maungatautari Road and 114, 114A, 118 and 120 Wordsworth Street, Leamington.

Background

Te Tāhuhu o te Mātauranga | Ministry of Education ('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 for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact existing and future educational facilities and assets within the Waipā region.

The Ministry has engaged with developers across the country, including the Waipā region, on plan changes. During consultation, specific objectives and policies that better enable the provision of future

educational facilities (should there be a need) have often been agreed upon and there is an opportunity on PC37 for the Applicant and the Ministry to work together to achieve favourable outcomes for the Cambridge community and surrounding school catchments.

The Ministry of Education's submission is:

The Ministry recognise that PC37 will enable a significant new residential community on the south-eastern edge of Leamington, potentially accommodating a large number of new households.

Given the scale of future development and need to respond to increased demand on school rolls, the Ministry seeks specific amendments and clarifications so that the District Plan and Rider Park Structure Plan:

- Adequately provides for education infrastructure
- Does not unintentionally constrain the planning, designation, development or operation of schools and early learning services
- Appropriately manages reverse sensitivity effects.

Future school network impacts

PC37 proposes to rezone approximately 98 hectares of land on the edge of Cambridge from the Deferred Residential Zone and Rural Zone to the Medium Density Residential Zone. The plan change would enable development capacity for approximately 1,250 additional dwellings within the plan change area (PCA).

While the residential zoning of part of the land was anticipated over the longer term due to its Deferred Residential status, PC37 would bring forward and intensify urban development within this area. The additional capacity sought through the rezoning of rural land, and the accelerated growth would significantly increase demand on the Cambridge school network and existing schools within the Cambridge area.

The Waipā 2050 Growth Strategy and the Future Proof Future Development Strategy identify the Cambridge education network as an area expected to experience high levels of growth over the next 25 years, with approximately 75 per cent of that growth projected to occur north of the Waikato River. PC37 would add materially to this growth pressure. However, the Ministry currently owns only one school site south of the Waikato River, Leamington Primary School, which has limited capacity for further expansion (location shown in Figure 1).



Figure 1. Schools within the vicinity of the plan change area.

Education infrastructure – enabling provisions

The Ministry seeks the inclusion of clear enabling provisions for education facilities within PC37, including within Section 2A – Medium Density Residential Zone of the Waipā District Plan. While no specific site for a new school has been identified at this time, such provisions would ensure the plan can accommodate a school should the Ministry identify the need and location in the future. Additionally, while the Ministry primarily relies on designations under the Resource Management Act 1991 for the delivery of schools, enabling plan provisions play an important complementary role in supporting integrated and well-functioning urban environments.

PC37 proposes a large greenfield urban expansion that will generate demand for primary and secondary schools, early learning services, and safe walking, cycling and transport connections to education facilities. In this context, education infrastructure should be explicitly recognised as essential social infrastructure that must be planned for alongside residential development.

Enabling zoning provisions would:

- Support the timely planning and delivery of education facilities in response to growth;
- Avoid uncertainty or unnecessary consenting barriers at early stages of development;

- Reinforce that schools and early learning services are anticipated and compatible activities within residential environments.

The Ministry supports education activities being provided for as permitted, controlled or restricted discretionary activities within the Medium Density Residential Zone, subject to proportionate development standards or matters of discretion. The Ministry does not support provisions that would require discretionary or non-complying consent, or that otherwise treat education facilities as exceptional or incompatible land uses.

Given the introduction of the Rider Park Structure Plan, it is also important that the structure plan framework explicitly recognises the potential need for future school sites and does not create land use patterns that would preclude or constrain future education designations should this be required. While the precise location and timing of future education facilities will be determined through the designation process, early recognition at the structure plan stage helps to avoid land fragmentation, reverse sensitivity conflicts, and costly retrofitting of infrastructure.

The Ministry therefore seeks amendments to PC37 to:

- Explicitly recognise schools and early learning services as essential infrastructure within the Rider Park Structure Plan area;
- Enable education facilities through appropriate activity status and development controls;
- Confirm that structure plan provisions do not constrain the establishment, scope or function of education designations;
- Ensure that reverse sensitivity effects are managed by new sensitive activities, rather than by limiting or constraining education operations.

Together, these measures would support the effective implementation of PC37 while maintaining the Ministry's ability to respond flexibly and efficiently to future education demand generated by the proposed development.

Walking and cycling provisions

The Ministry supports integrated transport outcomes that enable safe walking and cycling to schools.

The Ministry broadly agrees with the proposed walking and cycling provisions throughout the PCA.

Within Section 5.4 of the Transport Assessment, the Transport Expert states that "*the Structure Plan and cycling networks are expected to be highly permeable and designed to minimise the length of trips made by these modes*". Within Section 4.5 of the Assessment of Environmental Effects, the design principles state "*Pedestrian and cycle movement is catered for through the provision of pedestrian/cycling links. These movement corridors seek to provide regular opportunities for pedestrians and cyclists to access safe, protected routes with limited vehicle crossings... and link to public open spaces and into the wider walking and cycling network in Leamington and beyond*".

The Applicant also proposes a new rule under the Section 2A – Medium Density Residential Zone:

New Rule 15.4.2.91B

Any Development and/or Subdivision in the Rider Park Structure Plan Area shall ensure that upgrades and improvements to the transport, walking and cycling networks are completed in



accordance with the timing triggers and requirements outlined below as relevant to the development / subdivision stage under consideration:

a) If there are dwellings in the Structure Plan area that are reliant on a connection to Wordsworth Street only:

i. The Shakespeare Street/Wordsworth Street signalised intersection upgrade should be in place (or adequately committed) prior to issue of Section 224(c) certificate that would enable the 31st additional dwelling or any further incremental allocation as provided for within the PDA, with access via Wordsworth Street.

ii. A further 830 dwellings (up to 860 in total) can be developed with access via Wordsworth Street only.

iii. Development beyond 860 dwellings requires the Structure Plan connector road to connect from Wordsworth Street to Maungatautari Road, and the roundabout to be formed on Maungatautari Road.

b) If there are dwellings in the Structure Plan area that are reliant on a connection to Maungatautari Road only:

i. Up to 80 additional dwellings (if developed by 2026) or 40 dwellings (if developed by 2028) could be supported by an interim T-intersection on Maungatautari Road.

ii. Development beyond this level requires the roundabout to be formed on Maungatautari Road and the Structure Plan connector road to be connected such that there is a continuous connection from Wordsworth Street to Maungatautari Road.

Activities which fail to comply with this rule will require resource consent for a discretionary activity.

Quality pedestrian and cycle connections through neighbourhoods, including to schools, have health and safety benefits for children and reduce traffic generation at pick up and drop off times.

All existing and potential future schools, and the communities they serve, should be well serviced by safe and accessible pedestrian and cycling links through the community. This includes safe and convenient connections to the existing developed Cambridge area so that the site covered by the PCA is well integrated into the existing urban structure. The Ministry seeks that these linkages are operational from the outset to support the development and that they consider the most vulnerable users in their design.

The Ministry's position on the Proposed Plan Change

As a key stakeholder, the Ministry is committed to working constructively with Waipā District Council and the plan change applicant to refine provisions that support integrated, well-functioning communities.

If approved, early engagement around staging, timing and development of the area will be important to inform major investment decisions around the investment in existing school sites nearby and their ultimate development to respond to growth.

The Ministry has an ongoing interest in:



- How development is planned and sequenced, particularly in terms of infrastructure provision such as roading as this will impact the connectivity to existing local schools.
- The relevant provisions specifically acknowledging and providing for schools. This is critical given schools are an essential piece of social and community infrastructure. An absence of supportive provisions can place obstacles in the way of establishment of education facilities in future years.
- How safe walking and cycling infrastructure within the development and to and from existing local schools will be planned and delivered.
- The urban form and amenity provided through connected and usable areas of public open space.

The Ministry's requested relief will support a future school (or schools) to be located in an appropriate location with suitable infrastructure in place to serve the surrounding residential catchments should the Ministry identify the need and location in the future. The Ministry's requested relief will also support connectivity to existing local schools, town centres and the surrounding community in a safe and effective manner.

Decision sought

1. The Ministry is **neutral** on the private plan change if Council accepts the following relief and any consequential amendments (including Appendix 1) required to give effect to the matters raised in this submission.
2. The Ministry is identified as a key stakeholder for the plan change and should the plan change be approved, will be engaged throughout the entire process.

The Ministry wishes to be heard in support of its submission.

Eden Rima

Eden Rima
Planner – Beca Ltd
(Consultant to the Ministry of Education)

Date: 29 April 2026

Appendix 1: Amendments to Waipā District Plan – Section 2A – Medium Density Residential Zone

- Retention has been shown as red (**retention**); and
- Additions have been shown as an underline (addition).

2A.1. Introduction

2A.1.7: The maintenance of the social and community function of the Medium Density Residential Zone is important. This function can be undermined by the location of non-residential activities in Residential Zones. This Plan makes clear provision for commercial and industrial activities within their respective zones. The only exception in this zone is for some activities within listed heritage buildings. This exception has been specifically provided as an incentive to enable the adaptive re-use of listed Heritage Items.

2.2. Resource Management Issues

Non-residential activities

2A.2.16: The intensity of non-residential activities can cause adverse effects and detract from anticipated levels of residential amenity.

2A.2.17: Some non-residential activities can contribute positively to the neighbourhood and community function of the Medium Density Residential Zone, while others can undermine it. There is also the potential for non-residential activities in the Medium Density Residential Zone to undermine the function and purpose of the Industrial and Commercial Zones.

2A.2.18: The design and layout of non-residential buildings is often inconsistent with the amenity and character of the Medium Density Residential Zone, and can result in adverse effects beyond that anticipated in the zone.

2A.2.19: Within the Medium Density Residential Zone, in Te Awamutu, there are existing out of zone activities where significant investment has been made. It is important that these activities are recognised.

2A.3. Objectives and Policies

Objective – Non-residential activities

2A.3.8: To restrict the establishment of non-residential activities in the Medium Density Residential Zone, except for visitor accommodation, activities within listed heritage items, areas specifically identified on structure plans for this purpose, and those activities that provide for the health and well-being of the community, and have a functional and compelling need to locate within a Medium Density Residential Zone.

Policy - Maintain residential function

2A.3.8.1: To maintain the Medium Density Residential Zone for residential activities by ensuring that:

- a. Industrial activities and commercial activities are avoided within the Medium Density Residential Zone except as provided for in a structure plan or policy overlay; and

- b. Non-residential activities are not dominant within a residential block.

New Objective

2A.3.8.1.a: To recognise and provide for schools and early learning services as essential community infrastructure necessary to support the Rider Park Structure Plan area.

Policies - Non-residential activities

2A.3.8.2: To enable activities that provide for the health and well-being of the community and that service or support an identified local need. Examples include **education facilities**, childcare and pre-school facilities, places of worship, facilities that provide respite care, community centres, marae and hospitals. New activities shall not be established on rear sites, and sites located on cul-de-sacs, or that have access to strategic roads unless provided for in a structure plan.

2A.4. Rules

2A.4.1. Activity Status Tables

2A.4.1.3	Restricted Discretionary activities The following activities shall comply with the performance standards of this zone
<u>k.</u>	<u>Primary and Secondary Schools.</u>

2A.4.1.4	Discretionary activities
d.	<u>Other</u> education facilities, pre-schools and childcare facilities.

21.1. Assessment Criteria

21.1.2A Medium Density Residential Zone

Residential Zone Assessment Criteria		
Restricted Discretionary Activities		
<u>21.1.2A.25.a</u>	<u>Primary and Secondary Schools</u>	a. <u>Site planning and design</u> b. <u>Noise and operational effects</u> c. <u>Transport and access</u> d. <u>Infrastructure servicing</u> e. <u>Safety and amenity</u>