



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

To: The Independent Hearings Commissioners

From: Te Tāhuhu o Te Mātauranga | Ministry of Education ('the Ministry')

Date: 29 August 2025

Subject: Ministry of Education – Letter to be Tabled at the Hearing for Proposed Plan Change I: Increasing Housing Supply and Choice

Dear Commissioners,

Introduction

The Ministry made a submission in relation to Palmerston North City Council ('the Council') Proposed Plan Change I: Increasing Housing Supply and Choice ('PCI') on 04 February 2025 ('submitter number 196').

The Ministry's submission on PCI focused on the provisions that either, directly or indirectly, have the potential to impact on the Ministry's interests such as the management and operation of existing educational facilities or the establishment of new educational facilities. The Ministry has chosen not to attend the hearing for PCI which will be held on 01 September 2025, and requests that this letter be tabled at the hearing in lieu of attendance.

The Ministry has reviewed the Council Officer's Section 42A Report ('s42A Report') for PCI and supporting material. This letter specifically addresses and responds to the recommendations made in the Section 42A Report. In particular:

- Definitions proposed by PCI
- Objectives and Policies Proposed by PCI; and
- Rules proposed by PCI

Definitions proposed by PCI

The Ministry requested that the definition associated for 'educational facilities' ('SO196.1') is retained as notified. The Ministry notes that no changes were proposed by the Section 42A Reporting Officer who recommended that the requested relief is accepted. The Ministry considers that this matter is adequately resolved.

In relation to submission points SO196.2 and SO196.4, the Ministry sought the inclusion of a definition for additional infrastructure to support amendments to Objective MRZ-O2. The Section 42A Reporting Officer recommended rejecting this relief, as outlined in the summary for MRZ-O2 below.

Objectives and Policies proposed by PCI

The inclusion of Objective MRZ-O1 was supported by the Ministry (SO196.3), as it outlines the purpose of the Medium Density Zone (MRZ) and the types of residential and non-residential activities that are anticipated in the zone. The Section 42A Reporting Officer recommended the acceptance of the Ministry's relief. The Ministry considers that this matter is adequately resolved.

Reference to 'additional infrastructure' was requested by the Ministry (SO196.4) in Objective MRZ-O2. The Ministry requested that the term 'additional infrastructure' to be included in clause (g) as built development, enabled by PCI, should integrate with existing and planned additional infrastructure as well as infrastructure more generally (as defined by the Resource Management Act). The Section 42A Reporting Officer recommended the rejection of the Ministry's relief as they considered that including the term 'additional infrastructure' would expand the scope of Objective MRZ-O2 beyond what was originally intended by PCI.

The Ministry notes that the Section 42A Reporting Officer recommended consequential amendments to be made to MRZ-O2, to clarify the type of infrastructure that development integrates with (as set out by clause g). The Ministry agrees with the recommendations of the Section 42A Reporting Officer as the inclusion of the term 'development infrastructure' aids in providing clarity to the type of infrastructure that is covered by the policy to relate to core infrastructure provided by the Resource Management Act and typically by Council. Widening the scope of the policy to also include 'additional infrastructure' potentially undermines the provision proposed by the Council. The Ministry considers that the matters related for SO196.2 and SO196.4 are adequately resolved.

The Ministry supported the inclusion of Policies MRZ-P1 and MRZ-P5 as notified (SO196.5 and SO196.6). The section 42A Reporting Officer agreed with the relief sought by the Ministry and no further consequential amendments were made to either of the policies by the Section 42A Reporting Officer.

Rules proposed by PCI

The Ministry supported Rule MRZ-R12, which provides for educational facilities as a permitted activity, and as a restricted discretionary activity where specified standards are not met. Amendments were sought to the permitted activity rule (SO196.7) to reference the performance standards for MRZ-S3 Setbacks and MRZ-S4 Building Coverage.

The Section 42A Reporting Officer recommended rejecting the Ministry's requested relief. The rationale provided was that the Medium Density Residential Standards (MDRS) apply exclusively to residential activities and not to non-residential activities such as educational facilities, which may have significantly larger footprints. Additionally, as a Tier 2 local authority, Palmerston North City Council is not obligated to adopt MDRS provisions. The Reporting Officer further noted that the existing standards in the Operative District Plan are more appropriate for managing potential effects on adjacent residential properties.

While the Ministry's proposed amendments were not accepted, it is acknowledged that Rule MRZ-R12 still provides a viable pathway for establishing educational facilities as a permitted activity, subject compliance with the performance standards. The Ministry accepts the outcome of the Section 42A Report in this regard and considers the matter to be resolved.

If you wish to discuss aspects of this letter, please do not hesitate to contact the undersigned as a consultant to the Ministry.



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