



**WHANGANUI
DISTRICT COUNCIL**
Te Kaunihera a Rohe o Whanganui

Submission on a Publicly Notified Plan Change to the Whanganui District Plan

Resource Management Act 1991 In accordance with Form 5 - RM (Forms, Fees and Procedure) Regulations 2003

To: Whanganui District Council, PO Box 637, Whanganui

This is a submission on: Plan Change 63 Historic Heritage to the Whanganui District Plan.

Closing Date: 09/02/2025

Date received: 07/02/2025

Submission Reference Number #: 6

Submitter:

Ministry of Education

Contact person and address for service:

Zach Chisam
Beca Limited
85 Molesworth Street Thorndon Wellington 6011
New Zealand

Electronic address for service: zach.chisam@beca.com

Attachments:

Ministry of Education Submission.pdf

Ministry of Education Submission Figure 2.pdf

Ministry of Education Submission Figure 3.pdf

Ministry of Education Submission Figure 1.pdf

I wish to be heard: No

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **Yes**

Submission points

Point 6.1

Section: HH – Historic Heritage

Sub-section: General

Provision

General

Support/Oppose/Amend:

Submission

Amendment to the Class of historic heritage feature (item 331 identified in Appendix A) located within the existing school designation spatial boundary (MEDU-16) for Upokongaro School from C to B.

Relief sought

That Council notes:

The Minister of Education ('the Minister') is a requiring authority as defined in Section 166 of the Resource Management Act 1991 ('the RMA'). The Minister designates existing and proposed state school sites as an effective way of managing the Government's network of schools. Designated schools enable the Minister to respond to changes in the characteristics of the student school catchment and desires of the school community. All three schools mentioned above are designated. The Ministry recognises the historic value of the existing heritage item at Upokongaro School. The Ministry is required to provide education facilities that can respond to changes in the surrounding student populations, including developing existing sites where there are increases in the school roll. The amendment to the class of historic heritage feature would not recognise that schools must change over time to ensure education spaces are fit for purpose, and that school property must meet the operational and functional needs of the learning communities. The effect of section 176 of the RMA means that the designation will prevail over the heritage district plan rules, provided the Requiring Authority (the Minister of Education in this case) is undertaking the relevant project or work in accordance with the designation purpose. Notwithstanding this, we note that there are other controls placed on the Minister's ability to do works on a designated site, including a Section 176A Outline Plan process and designation conditions. Section 176A of the RMA requires the Minister to submit an Outline Plan to the Council before commencing any work in accordance with a designation. Any effects on heritage would be noted as part of this process (per Section 176A(3)(f)). The Ministry is therefore neutral on the amendments made to the classification of heritage listing on MEDU-16, and inclusion of a new archaeological site and new Wāhi Tūpuna site on MEDU-03 and MEDU-22 respectively. The Ministry also notes that the Heritage New Zealand Pouhere Taonga Act 2014 ('HNZPTA 2014') makes it unlawful for any person to modify or destroy, or cause to be modified or destroyed, the whole or any part of a recorded, suspected or unrecorded archaeological site without the prior authority of Heritage New Zealand. Before commencing any activity that may affect an archaeological site, an authority from Heritage New Zealand must be obtained.

Point 6.2

Section: HH – Historic Heritage

Sub-section: General

Provision

General

Support/Oppose/Amend:

Submission

Identification of a new archaeological site (item 315 identified in Appendix K) with its buffer area (when viewing the district plan interactive maps) located in an existing school designation spatial boundary (MEDU-03) for 8 Jones Street (part of Whanganui Girls College).

Relief sought

That Council notes:

The Minister of Education ('the Minister') is a requiring authority as defined in Section 166 of the Resource Management Act 1991 ('the RMA'). The Minister designates existing and proposed state school sites as an effective way of managing the Government's network of schools. Designated schools enable the Minister to respond to changes in the characteristics of the student school catchment and desires of the school community. All three schools mentioned above are designated. The Ministry recognises the historic value of the existing heritage item at Upokongaro School. The Ministry is required to provide education facilities that can respond to changes in the surrounding student populations, including developing existing sites where there are increases in the school roll. The amendment to the class of historic heritage feature would not recognise that schools must change over time to ensure education spaces are fit for purpose, and that school property must meet the operational and functional needs of the learning communities. The effect of section 176 of the RMA means that the designation will prevail over the heritage district plan rules, provided the Requiring Authority (the Minister of Education in this case) is undertaking the relevant project or work in accordance with the designation purpose. Notwithstanding this, we note that there are other controls placed on the Minister's ability to do works on a designated site, including a Section 176A Outline Plan process and designation conditions. Section 176A of the RMA requires the Minister to submit an Outline Plan to the Council before commencing any work in accordance with a designation. Any effects on heritage would be noted as part of this process (per Section 176A(3)(f)). The Ministry is therefore neutral on the amendments made to the classification of heritage listing on MEDU-16, and inclusion of a new archaeological site and new Wāhi Tūpuna site on MEDU-03 and MEDU-22 respectively. The Ministry also notes that the Heritage New Zealand Pouhere Taonga Act 2014 ('HNZPTA 2014') makes it unlawful for any person to modify or destroy, or cause to be modified or destroyed, the whole or any part of a recorded, suspected or unrecorded archaeological site without the prior authority of Heritage New Zealand. Before commencing any activity that may affect an archaeological site, an authority from Heritage New Zealand must be obtained.

Point 6.3

Section: HH – Historic Heritage

Sub-section: General

Provision

General

Support/Oppose/Amend:

Submission

Identification of a new Wāhi Tūpuna site (item 336 in Appendix B) within the existing school designation spatial boundary (MEDU-22) for Aramoho School.

Relief sought

That Council notes:

The Minister of Education ('the Minister') is a requiring authority as defined in Section 166 of the Resource Management Act 1991 ('the RMA'). The Minister designates existing and proposed state school sites as an effective way of managing the Government's network of schools. Designated schools enable the Minister to respond to changes in the characteristics of the student school catchment and desires of the school community. All three schools mentioned above are designated. The Ministry recognises the historic value of the existing heritage item at Upokongaro School. The Ministry is required to provide education facilities that

can respond to changes in the surrounding student populations, including developing existing sites where there are increases in the school roll. The amendment to the class of historic heritage feature would not recognise that schools must change over time to ensure education spaces are fit for purpose, and that school property must meet the operational and functional needs of the learning communities. The effect of section 176 of the RMA means that the designation will prevail over the heritage district plan rules, provided the Requiring Authority (the Minister of Education in this case) is undertaking the relevant project or work in accordance with the designation purpose. Notwithstanding this, we note that there are other controls placed on the Minister's ability to do works on a designated site, including a Section 176A Outline Plan process and designation conditions. Section 176A of the RMA requires the Minister to submit an Outline Plan to the Council before commencing any work in accordance with a designation. Any effects on heritage would be noted as part of this process (per Section 176A(3)(f)). The Ministry is therefore neutral on the amendments made to the classification of heritage listing on MEDU-16, and inclusion of a new archaeological site and new Wāhi Tūpuna site on MEDU-03 and MEDU-22 respectively. The Ministry also notes that the Heritage New Zealand Pouhere Taonga Act 2014 ('HNZPTA 2014') makes it unlawful for any person to modify or destroy, or cause to be modified or destroyed, the whole or any part of a recorded, suspected or unrecorded archaeological site without the prior authority of Heritage New Zealand. Before commencing any activity that may affect an archaeological site, an authority from Heritage New Zealand must be obtained.



WHANGANUI DISTRICT COUNCIL

Te Kaunihera a Rohe o Whanganui

Submission on a Publicly Notified Plan Change to the Whanganui District Plan

Resource Management Act 1991 In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

TO: Whanganui District Council, PO Box 637, Whanganui

Name: (print in full) Te Tuhū o Te Mātauranga | Ministry of Education

This is a submission on Plan Change No. ⁶³..... to the Whanganui District Plan.

Closing Date: 09/02/2025

1. (a) I could / **could not** gain an advantage in trade competition through this submission.
(b) **I am** / **am not** directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition.

2. The specific provisions of the proposed plan change that my submission relates to:

.....
Please see attached submission document

.....
(Use additional pages if required)

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):

.....
Please see attached submission document

.....(Use additional pages if required)

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):

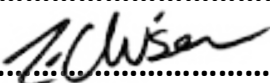
.....
Please see attached submission document

..... (Use additional pages if required)

5. I **do/do not** wish to be heard in support of this submission.
6. If others make a similar submission I **would /would not** be prepared to consider presenting a joint case with them at any hearing.

7. **Address for service:**

Zach Chisam c/- Beca Limited
.....
85 Molesworth Street.....
Thorndon 6011.....

Signature: .....

.....
(Person making submission or person authorised to sign on behalf of person making submission)

Day time phone No: +64 4 460 1775.....

Email: zach.chisam@beca.com.....

Date: 07/02/2025.....



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

FORM 5
**SUBMISSION ON NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION UNDER CLAUSE 6 OF SCHEDULE 1,
RESOURCE MANAGEMENT ACT 1991**

To: Whanganui District Council

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

Address for service: C/- Beca Ltd
85 Molesworth Street,
Thorndon,
Wellington 6011

Attention: Zach Chisam

Phone: (04) 460 1775

Email: Zach.Chisam@beca.com and moe.submissions@beca.com

This is a submission on a change proposed to the Whanganui District Plan:

This submission relates to the Whanganui District Council's ('the Council') notified proposed Plan Change 63 ('PC63') on Heritage to the Whanganui District Plan ('district plan').

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 plan changes, notified resource consents, 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.

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 on existing and future educational facilities and assets in Whanganui.

The Ministry's submission is:

The Council is currently undertaking a review of their Historic Heritage chapter and associated appendices (Appendix A - Heritage Items and Appendix K - Archaeological and Wāhi Tūpuna) with the changes to the district plan being identified and implemented through PC63. PC63 proposes the following in relation to schools:

- Amendment to the Class of historic heritage feature (item 331 identified in Appendix A) located within the existing school designation spatial boundary (MEDU-16) for Upokongaro School from C to B;
- Identification of a new archaeological site (item 315 identified in Appendix K) with its buffer area (when viewing the district plan interactive maps) located in an existing school designation spatial boundary (MEDU-03) for 8 Jones Street (part of Whanganui Girls College); and
- Identification of a new Wāhi Tūpuna site (item 336 in Appendix B) within the existing school designation spatial boundary (MEDU-22) for Aramoho School.

The location and extent of these features have been illustrated in **Appendix 1**.

The Minister of Education ('the Minister') is a requiring authority as defined in Section 166 of the Resource Management Act 1991 ('the RMA'). The Minister designates existing and proposed state school sites as an effective way of managing the Government's network of schools. Designated schools enable the Minister to respond to changes in the characteristics of the student school catchment and desires of the school community. All three schools mentioned above are designated.

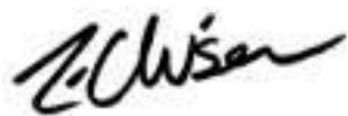
The Ministry recognises the historic value of the existing heritage item at Upokongaro School. The Ministry is required to provide education facilities that can respond to changes in the surrounding student populations, including developing existing sites where there are increases in the school roll. The amendment to the class of historic heritage feature would not recognise that schools must change over time to ensure education spaces are fit for purpose, and that school property must meet the operational and functional needs of the learning communities.

The effect of section 176 of the RMA means that the designation will prevail over the heritage district plan rules, provided the Requiring Authority (the Minister of Education in this case) is undertaking the relevant project or work in accordance with the designation purpose. Notwithstanding this, we note that there are other controls placed on the Minister's ability to do works on a designated site, including a Section 176A Outline Plan process and designation conditions. Section 176A of the RMA requires the Minister to submit an Outline Plan to the Council before commencing any work in accordance with a designation. Any effects on heritage would be noted as part of this process (per Section 176A(3)(f)). The Ministry is therefore neutral on the amendments made to the classification of heritage listing on MEDU-16, and inclusion of a new archaeological site and new Wāhi Tūpuna site on MEDU-03 and MEDU-22 respectively.

The Ministry also notes that the Heritage New Zealand Pouhere Taonga Act 2014 ('HNZPTA 2014') makes it unlawful for any person to modify or destroy, or cause to be modified or destroyed, the whole or any part of a recorded, suspected or unrecorded archaeological site without the prior authority of Heritage New Zealand. Before commencing any activity that may affect an archaeological site, an authority from Heritage New Zealand must be obtained.

The Ministry does not wish to be heard in support of their submission.

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



Zach Chisam
Planner
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04 460 1775
Zach.Chisam@beca.com AND moe.submissions@beca.com

Appendix 1 – District Plan mapping features proposed by Plan Change 63: Heritage



Figure 1: Upokongaro School, Wāhi Tūpuna item 331 (purple pentagon point) and existing school designation (MEDU-16) outlined in light blue.



Figure 2: 8 Jones Street (part of Whanganui Girls College), heritage item 315 (blue point), buffer (hatched purple polygon) and existing school designation MEDU-03.



Figure 3: Aramoho School and Wāhi Tūpuna item 336 (blue pentagon point) and existing school designation (MEDU-22) outlined in light blue.