

Nicholas Law

From: Antoni Facey <antoni@avanzar.co.nz>
Sent: Wednesday, 9 August 2023 14:06
To: Nicholas Law
Cc: Mary Clay
Subject: RE: Ashburton Plan Change 5 - Ministry of Education submission

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Categories: Blue Category, [SharePoint] This message was saved in 'District Plan Gen 2 > Plan Change > Plan Change 5 - Hearing - 73'

Hi Nicholas

Im assuming the 30 mentioned in the MOE submission is an error and should be 70.

There is a considerable variety of ways this is addressed. CCC has a basic ITA for less than 150 students and a full ITA after that. Note that the basic and full ITA are almost the same anyway. Dunedin CC has this below.

High Trip Generators

The group of activities which includes:

- new or additions to parking areas that result in 50 or more new parking spaces; and
- any activities that generate 250 or more vehicle movements per day.

RRU 453 is a bit risky to base a decision on. The actual surveys the report is based on are more useful. In this case, there only 3 schools in the database so the sample is small. It was mostly based in cities with 1 in Wanaka and 1 in Timaru. The data suggests that about 1 car per 3 students arrive on site but it may not include those that stop on street. One survey suggests 50% come by car with 1.5 students/car. The data is also old.

I am inclined to stick with the 70 student limit because we are probably nearer 150 movements per day from 70 students based on the above survey (2 movements to deliver and 2 to pick up those that travel by car). If MOE come up with better data, that could be reconsidered. If it was raised to 100 students, that's nearer 240 with staff included. This is consistent with the limit of 10.10.1 d which is based on 250 movements per day (I am wondering if the 250 hvm/d is an error I missed and it may be more appropriate as 250 vehicle movements/day since the h could be interpreted to be heavy vehicles only?).

We also need to consider that schools of less than 100 students are unlikely to be built in an urban area. They are getting much larger than previously. A rural school could be smaller but is likely to rely on school buses and cars more than other modes of travel.

I really don't see the likely traffic generation of a small primary school causing road capacity issues but the higher number of movements over a short period concentrated around the school entrances creates more issues than just road capacity so a smaller traffic generation can be justified. There are many other considerations to include in the ITA that will be more important like safety, school bus parking, drop off points, etc. But if their surveys don't suggest lower traffic generation rates, I would prefer to stick with 70 as the limit.

A bit of a brain dump but happy to discuss if you want.

Regards

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From: Nicholas Law <Nicholas.Law@adc.govt.nz>

Sent: Monday, August 7, 2023 4:54 PM

To: Antoni Facey <antoni@avanzar.co.nz>

Subject: Ashburton Plan Change 5 - Ministry of Education submission

Hi Antoni,

Plan change 5 further submissions have closed. Attached is a summary of submissions. I have been talking informally with the submitters and it is looking like I might be able to avoid a hearing by securing general agreement on amendments.

Are you able to help with transport comment on the submission point 3.5 from Ministry of Education. They are seeking a basic ITA threshold of 100 primary school students instead of 70.

My thought is that the current threshold is consistent with the ones proposed in Selwyn (and Timaru). The claim that the NZTA research report is based on one child travelling alone is incorrect, as the report accounts for some cases of children sharing a ride, staff, and children travelling by different modes. Unless MoE can provide evidence to support why the threshold should be lower, I think it should stay as it is.

Selwyn District Council officers are proposing to stick with a threshold of 70 students, despite the MoE seeking to raise the threshold in a submission on Variation 1 to the proposed Selwyn District Plan. This is on the basis of advice from their consultants, Abley and the lack of evidence from MoE.

What do you think? Is 70 students the most appropriate threshold in the Ashburton context?

MoE indicated that they may supply some further evidence over the next week or two to support their claim that the threshold is too low.

Are you able to please provide comment by the end of Thursday 10th August?

Kind regards,
Nicholas

Nicholas Law | [Senior Planner](#)

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