



Form 5

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

To: Ashburton District Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
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This is a submission on Plan Change 5 to the Ashburton District Plan

Background

The Ministry of Education 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 not only for all State schools owned by the Crown, but also those State schools that are not owned by the Crown, such as designated character schools and State integrated schools. For the Crown owned State school 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 a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Ashburton District.

The Ministry's submission is:

The Ministry has a particular interest in the parts of Plan Change 5, 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 provisions that most directly impact on the Ministry are the high trip generating activities (HTGA) thresholds, including for educational facilities, cycle parking requirements for schools and the objectives and policies pertaining to HTGA and cycle parking.

The Ministry seeks the following from the **Ashburton District Council**:

The requested relief on Plan Change 5 is outlined in **Appendix 1** to this submission. The relief sought is shown in red underscore and ~~red strikethrough~~.

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



Sara Hodgson
(Signature of person authorised to sign on behalf of the Ministry of Education)

Date: 28/04/2023

Appendix 1

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
Chapter 10: Transportation					
1	Policy 10.3H	To ensure that high traffic generating activities promote opportunities for safe and efficient travel other than by private motor vehicle.	Support	The Ministry supports this policy as it promotes safe and efficient operation of the transport network within the district with a focus on encouraging active modes.	Retain as proposed.
2	Policy 10.4E	Avoid, where reasonably practicable, or else mitigate the adverse effects of high traffic generating activities on the transport network and the amenity of the environment.	Oppose	The Ministry considers that the language of “avoid” is unnecessarily restrictive. High Trip Generating Activities should be provided where adverse effects are mitigated.	Amend as follows: Avoid, where reasonably practicable, or else Mitigate the adverse effects of high traffic generating activities on the transport network and the amenity of the environment.
3	Policy 10.F	Promote positive transport effects from high traffic generating activities.	Support	The Ministry supports this policy as it promotes positive transport effects on the transport network	Retain as proposed.
4	10.8.1	10.8.1 High Traffic Generating Activities	Support	The Ministry support the provisions of a Restricted Discretionary activity for	Retain as proposed.

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		<p>a) Any new subdivision or land use activity, or changes in use that exceed thresholds set out in Table 10-1 shall be classified as a High Traffic Generator and a restricted discretionary activity.</p> <p>b) A Basic Integrated Transport Assessment shall be undertaken for activities that exceed the threshold for a Basic Assessment in Table 10-1 below. The relevant assessment matters shall be restricted to those set out in 10.10.1 a. to c. (Safety and efficiency, Design and Layout, and ITA requirements).</p> <p>c) A Full Integrated Transport Assessment shall be undertaken for activities that exceed the threshold for a Full Assessment in Table 10-1 below. The relevant assessment matters shall be restricted to those set out in 10.10.1 a. to e. (Safety and efficiency, Design and layout, ITA requirements, Heavy vehicles, and Network effects).</p> <p>d) Where an Integrated Transport Assessment has already been approved for the site as part of a granted resource consent, then these rules do not apply to any development that is within scope of that Integrated Transport Assessment and in accordance with the resource consent, unless the resource consent has lapsed.</p>		<p>educational activities. The Ministry typically prepare an ITA as part of the Notice of Requirement and Outline Plan processes. The amended thresholds set out in Table 10-1 considered appropriate.</p>	

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5	Table 10-1	<p>Table 10-1: Thresholds for High Traffic Generating Activities</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Basic Assessment required</th> <th>Full Assessment</th> </tr> </thead> <tbody> <tr> <td>Education: Preschools</td> <td>40 children</td> <td>90 children</td> </tr> <tr> <td>Education: Schools</td> <td>70 students</td> <td>170 students</td> </tr> <tr> <td>Education: Tertiary</td> <td>250 FTE students</td> <td>750 FTE students</td> </tr> </tbody> </table>	Activity	Basic Assessment required	Full Assessment	Education: Preschools	40 children	90 children	Education: Schools	70 students	170 students	Education: Tertiary	250 FTE students	750 FTE students	Support in part	<p>The Ministry requests that the qualifier for 'Education – Schools' is increased. Based on the data included in the Waka Kotahi 'Research Report 453 Trips and parking related to land use', 30 students would only result in 96 daily and 42 peak hour vehicle trips. The aforementioned traffic movements are based on the presumption that every pupil is driven to school in a vehicle carrying one student only. In reality, schools are often accessible by various transport modes including bicycle, bus, and walking. This combined with multiple students travelling in the same vehicle further reduces the traffic movements. As such, the Ministry requests that the qualifier for 'Education – Schools' is raised.</p>	<p>Amend as follows:</p> <p>Table 10-1: Thresholds for High Traffic Generating Activities</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Basic Assessment required</th> <th>Full Assessment</th> </tr> </thead> <tbody> <tr> <td>Education: Preschools</td> <td>40 children</td> <td>90 children</td> </tr> <tr> <td>Education: Schools</td> <td>70<u>100</u> students</td> <td>170 students</td> </tr> <tr> <td>Education: Tertiary</td> <td>250 FTE students</td> <td>750 FTE students</td> </tr> </tbody> </table>	Activity	Basic Assessment required	Full Assessment	Education: Preschools	40 children	90 children	Education: Schools	70 <u>100</u> students	170 students	Education: Tertiary	250 FTE students	750 FTE students
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6	10.8.6	<p>Cycle Parking</p> <p>a) All developments, other than residential and farming, in the Business A Zone are to provide long term cycle parking on the same site as the activity to at least the minimum numbers</p>	Support	<p>The Ministry supports the encouragement of active transport modes such as cycling, walking and the overall encouragement of cycle parking.</p>	Retain as proposed.																								

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		<p>specified in Table 10-5. at a rate of 1 cycle space for every 20 car parking spaces provided.</p> <p>b) In other zones, all developments other than farming activities are to provide Visitor and Long Term cycle parking on the same site as the activity to at least the minimum numbers specified in Table 10-5</p> <p>c) Where the calculation of the number of cycle parks results in a fractional number, any fraction under one half shall be disregarded and any fraction of one half or more shall be counted as one space.</p> <p>d) Where a land use corresponds with two or more similar activities in Table 10-5, the activity with the higher cycle parking rate shall apply. Where there are two or more separate activities on a site, the total requirement for the site shall be the sum of the cycle parking requirements for each activity</p> <p>e) All required visitor cycle parking shall be provided as follows:</p> <ul style="list-style-type: none"> • in cycle stands and laid out in accordance with Appendix 10-3 and securely anchored to an immovable object; • on the same site and conveniently located to the activity it serves; 			

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		<ul style="list-style-type: none"> • clearly visible to cyclists entering the site or appropriately signposted; and • well lit. <p>f) All required long term cycle parking shall be provided as follows:</p> <ul style="list-style-type: none"> • provided in cycle stands and laid out in accordance with Appendix 10-3; • on the same site as the activity; • well lit and covered; • located in a secure area, unless located in an area where access by the general public is generally excluded; and • where a cycle stand is provided, it shall be laid out in accordance with Appendix 10-3. 									
7	Table 10-5	<p>Table 10-5 Minimum Cycle Parks Required</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Visitor Cycle Parks (for the use of customers/visitors)</th> <th>Long Term Cycle Parks (for the use of</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Activity	Visitor Cycle Parks (for the use of customers/visitors)	Long Term Cycle Parks (for the use of				Support	The Ministry supports the encouragement of active transport modes such as cycling, walking and the overall encouragement of cycle parking.	Retain as proposed.
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				staff/students and residents			
		Educational Facilities – Primary and secondary	1 space per 50 students	Students: 1 cycle or scooter park per 5 pupils, and Staff: 1 cycle park per 5 FTE employees			
		Educational facilities – tertiary	1 space per 100 FTE students	1 space per 5 FTE students; and 1 space per 5 FTE employees			
8	10.10.1	<p>10.10 Assessment Matters</p> <p>10.10.1 High Traffic Generating Activities</p> <p>a) Whether the provision of access and on-site manoeuvring areas associated with the activity, including vehicle loading and servicing deliveries, affects the safety, efficiency, accessibility (including for people whose mobility is restricted) of the site, and the land transport network (including considering the network classification of the frontage road).</p>			Support	The Ministry supports the proposed Assessment Matters as the Ministry is supportive of providing a safe transport network for High Traffic Generating Activities.	Retain as proposed.

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		<p>b) Whether the design and layout of the proposed activity promotes opportunities for travel other than private cars, including by providing safe and convenient access for travel using more active modes.</p> <p>c) Whether the ITA has been prepared by a suitably qualified and experienced transport specialist.</p> <p>d) Whether there are any effects from the anticipated trip generation and how they are to be mitigated where activities will generate more than 250hvm/d.</p> <p>e) Having particular regard to the level of additional traffic generated by the activity, whether measures are proposed to adequately mitigate the actual or potential effects from the anticipated trip generation (for all transport modes) from the proposed activity, including consideration of cumulative effects with other activities in the vicinity, proposed infrastructure, and construction work associated with the activity.</p>			