

Our Ref: 2638-21

12 December 2022

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Tēnā koe Jane,

D220002 – MINISTER OF EDUCATION NOTICE OF REQUIREMENT: ROLLESTON SECONDARY SCHOOL RESPONSE TO FURTHER INFORMATION REQUEST – TRANSPORT

This letter is in response to the Carriageway Consulting peer review of the Transportation Assessment (and supplementary information) in relation to the above Notice of Requirement ('NOR'), received 17 October 2022. As per our discussions, the following responds to the matters for which the peer review has recommended specific designation conditions, which broadly relate to the following key areas:

- Springston Rolleston Road / Selwyn Road intersection;
- Kea crossing / footpath funding;
- Eileen Way pedestrian / vehicle access;
- Car parking requirements.

We note that in responding to the peer review, we are proposing additional conditions from those identified in the NOR lodged with Selwyn District Council ('SDC') 10 June 2022. These additional conditions serve to appropriately address the area of mitigation as noted by the peer review, whilst providing suitable flexibility for future educational / design outcomes and assessment as part of the Outline Plan of Works ('OPW') process. We welcome any feedback and comment on these additional conditions.



1 SPRINGSTON ROLLESTON ROAD / SELWYN ROAD INTERSECTION

The modelling in the RFI Response shows that the Springston Rolleston Road / Selwyn Road intersection is unable to accommodate the traffic generated by the school. We acknowledge that the intersection is intended to be upgraded to a roundabout, but this appears critical to the safe and efficient operation of the roading network, and we therefore consider that there should be a condition on the designation that the school could not open until either the roundabout is in place at the intersection, or works are underway to form the roundabout.

Please refer to the memorandum prepared by Abley enclosed as **Attachment [A]** for a comprehensive and technical response to this recommendation. By way of brief summary, based on the additional modelling work undertaken by Abley, and our further investigations, we note the following key points in response:

- The need for an upgrade of the intersection of Springston Rolleston and Selwyn Road is well recognised, as outlined within the ITA and the further information response dated 12 September 2022. The need for this upgrade is driven by a range of factors, and whilst we understand it is programmed for between 2024-2027, expert transport reports commissioned on behalf of SDC have recommended the upgrade be completed earlier¹.
- The modelling undertaken as part of the ITA submitted with the NOR was highly conservative and based on a full master planned roll outcome (and assessed against the existing priority controlled intersection form). Following discussions with Carriageway Consulting, a revised modelling outcome was undertaken, with this based on the more reasonable and realistic scenario involving the expected school roll at 2028², as identified in the further information response dated 12 September 2022. We note that this scenario has assumed a 'senior campus' educational outcome reflecting prior discussions, however the project brief remains for a full standalone secondary school facility.
- As identified in the Abley Memorandum enclosed as Attachment [A], the modelling has identified that based on the school roll scenario at 2028, and during the critical AM peak, the intersection of Springston Rolleston and Selwyn Road will operate at LOS C with average delays of 11 seconds across all approaches.

Overall, it is considered that whilst there is a recognised need for an upgrade of the intersection, the modelling and analysis from Abley has demonstrated that the intersection in its current form would have sufficient capacity to accommodate the expected student roll scenario at 2028. Beyond this date it is considered there is greater certainty that the upgrade to the intersection will be in place, or under construction. To this end, a condition that would

² As outlined, two roll scenarios have been identified, with this based on whether the future educational facility will be for Years 12-13 or Years 11-13. The maximum student roll scenario anticipated for 2028 is 1500 students, with this at the upper maximum of the roll scenario provided by the Ministry's network team.



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¹ Refer Section 5.4, R1C210920 - PC78 Hearing report.pdf (selwyn.govt.nz)



prevent the school from opening until the intersection is completed is not considered reasonable or appropriate.

2 MINOR INFRASTRUCTURE WORKS / FUNDING

A number of infrastructure measures appear to be needed due to the movement of students (the Kea crossing, footpaths on Selwyn Road and buildouts), but no funding arrangements for these are presently confirmed.

Whilst the Ministry of Education is exempt from development contributions³ and financial contributions⁴, the Ministry recognise the importance of ensuring alignment between any on road works / interventions and school accessibility arrangements. In this respect, the Ministry as part of their site acquisition have coordinated with the developer to ensure appropriate infrastructure is in place to ensure the site can be safely and efficiently accessed from within the wider development and beyond.

The further information response dated 12 September 2022 identified the range of on road interventions which have been undertaken, or will be undertaken, and the identified responsibility⁵. In this regard, we note that:

- the provision of a footpath network adjacent to the school along Selwyn Road was identified as a matter to be addressed as part of the OPW, with the Ministry responsible for the same.
- the reference to the 'Kea Crossing Hungerford Drive' and shared responsibility between SDC and Ministry recognised the need to coordinate this at a later time and in conjunction with SDC as the road asset owner, noting the kea crossing would only be required for a primary school development.

The Ministry recognise that any works that are directly related and associated with the future school development will require a financial contribution / commitment from the Ministry. Whilst a designation condition identifying funding arrangements for these works is not considered appropriate, the Ministry are amenable to an 'Advice Note' on the designation which records and recognises the responsibility for certain specific works will fall on the Ministry. To this end, the proposed 'Advice Note' wording is outlined as follows:

PROPOSED Advice Note:

- a. Unless already delivered by others or otherwise agreed with Selwyn District Council, the Ministry of Education will be responsible for the funding and delivery of the following on-road interventions:
 - a 'Kea Crossing', with this to be in place prior to the opening of the primary school;
 - ii) the continuation of a footpath along Selwyn Road directly adjacent to the school site, the details of which (i.e. length, formation, design etc) will respond to the

⁴ S171(2A), RMA



³ Section 8, LGA

⁵ Table 2.2, Abley Memorandum dated 7 September 2022



specific location of any direct vehicle or pedestrian access points to the school along Selwyn Road.

3 EILEEN WAY PEDESTRIAN / VEHICLE ACCESS

An increase in traffic on Road 1 could arise from either a vehicular or a pedestrian access located onto this road. We recommend that a condition is put in place to prohibit any access onto Road 1.

A prohibition on any access to Road 1 (Eileen Way) is not considered a reasonable approach or outcome, noting that this frontage is approximately 300m in length, serves a relatively small number of residential allotments, and is a low speed local road environment. Further, Eileen Way accommodates a shared path network adjacent to the school site, with this forming part of a wider continuous shared path network in the area. We note that the memorandum prepared by Abley enclosed as **Attachment [A]** provides commentary in relation to Eileen Way, confirming that:

... it would be possible to provide access to the site from Eileen Way, although it is considered that further assessment will be required to assess the effects of this once the site layout is better understood (and based on nature and scale of any potential future access). This will allow for, and ensure that, suitable mitigation measures are considered and implemented as appropriate. This could, for example, include the installation of broken yellow no stopping at all times (NSAAT) lines on one side of the road.

Based on the above, it is considered that a safe and efficient vehicle or pedestrian access outcome can be accommodated to Eileen Way, subject to further detailed design and assessment.

Following discussions with Carriageway Consulting, and to provide certainty that all relevant transportation measures will be considered as part of a future OPW (with particular emphasis on any works associated with Eileen Way), an additional designation condition requiring the preparation of an ITA is proposed, with this outlined as follows:

PROPOSED Condition:

X. The Requiring Authority shall, in accordance with the requirements of s176A of the Resource Management Act 1991, submit an Outline Plan of Works for the construction and development of the secondary school, which shall include a Transport Assessment prepared by a suitably qualified traffic engineer/transportation planner which, taking into account the Integrated Transport Assessment (ITA) prepared by Abley dated 6 June 2022, addresses safety, efficiency and the following specific matter:

a. Safe access for pedestrians, cyclists and vehicles to Eileen Way (if relevant), including any appropriate mitigation measures and treatments / on road interventions to minimise conflicts between all transport modes.

We note the above condition is in addition to the existing proposed condition⁶ relating to the preparation and submission of a Transport Management Plan ('TMP'). This TMP condition is a comprehensive response to initial and ongoing transport management measures associated with the school, requiring consideration of sustainable travel modes, access, parking, and integration of the school with the surrounding transport network. Notably, this TMP condition



⁶ Condition 5, NOR, dated 3 June 2022



includes a requirement for reviews to be undertaken by SDC as part of any OPW that increases student capacity by more than 100 students since the TMP was last reviewed. We consider that this, in conjunction with the above specific requirement for an ITA, provides an appropriate response to any issues of concern associated with access, parking or vehicle movements associated with future school development.

4 CAR PARKING REQUIREMENTS

If insufficient car parking is provided within the site, this could lead to parking on Springston Rolleston Road and/or Selwyn Road and/or within residential roads in the adjacent subdivisions. This would not be an appropriate outcome and so we consider that an appropriate parking ratio should be included as a condition on the designation (or at the very least, an assessment of parking demand should be required in order to demonstrate that on-street parking will not occur).

Please refer to the memorandum prepared by Abley enclosed as **Attachment [A]** for a comprehensive response to this recommendation. By way of brief summary, Abley have considered the policy direction of the National Policy Statement on Urban Development 2020 ('NPS-UD'), the objectives of the Ministry nationally in terms of enhancing sustainable school travel modes, and the kerbside parking environment, and overall, consider that prescribing a specific minimum car parking ratio as part of the NOR is not an appropriate response. In this respect, we note the following key points:

- The imposition of a specific minimum parking ratio / requirement for the site is considered to conflict with the direction of the NPS-UD, which requires the removal of minimum car parking requirements, and encourages the management of effects associated with the supply and demand of car parking through comprehensive parking management plans⁷.
- The issue of parking supply will not be determined until master planning is complete, and will be identified and assessed as part of a future OPW. In this regard, the provision of parking on site will be informed by the sustainable travel goals of the school, including the provision of end of journey facilities on site (e.g. cycle, e-bike, scooter parking, showers, lockers etc), and consideration of public transport opportunities and walking / cycling routes.
- The NOR includes a specific condition that requires the resourcing, developing and actioning of a TMP (prior to the first OPW), the full wording of which is repeated below:

EXISTING Condition:

5. Transport Management Plan

Prior to the lodgement of the first outline plan for the secondary school, the Requiring Authority will, in consultation with the Asset Manager Transportation for Selwyn District Council or its successors, resource, develop and action a Transport Management Plan, which:

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⁷ Policy 11(b), NPS-UD



- a. sets the initial goals of the school with respect to sustainable travel modes and the mitigating real and potential adverse traffic effects;
- b. ensures sufficient access and off street car parking, including for drop off and pick up, and bus parking, is provided;
- c. facilitates the integration of the school with the surrounding transport network (including pedestrian and cycling access to the site);
- d. provides an assessment, if no school travel plan has been provided, as to how a school travel plan would be developed.

The Transport Management Plan shall be reviewed by the Council's Asset Manager Transportation at the time of submitting any and each outline plan relating to increased student capacity of more than 100 students since the Transport Management Plan was last reviewed, and shall be maintained and regularly updated while the school is operating under this designation.

As identified, the TMP is specifically required to 'ensure sufficient access and off street car parking, including for drop off and pick up, and bus parking is provided'. This TMP is required to be prepared in consultation with SDC (prior to lodgement of the OPW), and is required to be reviewed as part of any OPW which increases student capacity by more than 100 students. This is considered to be a robust response to the management of parking associated with the future school development, ensuring that sufficient parking is provided, and that this provision does not undermine wider goals around sustainable travel modes.

Overall, we consider that the OPW is the appropriate time in which to consider the issues of parking supply and demand, with the above TMP condition providing appropriate certainty that any parking issues or concerns can be appropriately identified, avoided and mitigated where necessary, with this assessment undertaken in consultation with SDC.

We trust this additional information will afford you further clarity with respect to the NOR. Please do not hesitate to contact me should you have any queries, or if you wish to discuss the proposed conditions (including modifications to the same). You can contact me direct on 027 465 8099 or via email at daniel@townplanning.co.nz.

Nāku iti noa, nā | Yours sincerely,

Town Planning Group

Daniel /Thorne

Director

Encl: Attachment A – Abley, Response to Council Peer Review Memo, dated 2 December 2022

