

Planning Department
Selwyn District Council
PO Box 90
ROLLESTON 7643

3 March 2011



NOTICE OF SUBMISSION ON SELWYN DISTRICT PROPOSED PLAN CHANGE 12 – INTEGRATED TRANSPORT MANAGEMENT

Person making submission: The Minister of Education

Address: Ministry of Education
Southern Region
Private Bag 2522
CHRISTCHURCH
(Please note different address for service)

1. The Ministry of Education (“the Ministry”) wishes to make a submission on Proposed Plan Change 12 to the Selwyn District Plan
2. The specific provisions of the Proposed Plan Change that the Ministry submission relates to are as follows:
 - The whole application.
3. The Ministry’s submission is:
 - The Ministry supports a number of objectives and policies of the proposed plan change.
 - The Ministry opposes in part the proposed plan change in its current form for the following reasons:

Minimum Parking Spaces to be Provided

- 3.1 For ‘Education Activities’ the proposed new transport rules contained in Table E13.1(a) double the number of staff carparking required and increases the number of student car parks. There is a new requirement for visitor/setdown car parks.
- 3.2 The proposed new transport rules are considered to not be unreasonable for secondary schools. However, the Ministry wishes to encourage alternative modes of transport to school such as walking and cycling. The Ministry seeks a reduction in the carparking requirements or alternatively reassurance that a reduction in carparking numbers would be acceptable if a travel management plan was in place for schools.
- 3.3 The Ministry is of the view that consideration needs to be taken of the driving age which is proposed to change from 15 years to 16 years in the middle of 2011. Therefore, when the driving age goes up the rules relating to under/above 15 years will not reflect the current legislative requirements.

Mobility Impaired Parking

- 3.4 Rule 13.1.1.6 is unclear as to how many mobility impaired car parks are required for development in school sites. Rule 13.1.1.6 refers to table E13.1(a) relating to the total number of car parks required on the site and does not specify a minimum number of mobility impaired parking spaces to be provided.

Existing Educational Activities

- 3.5 The Ministry is of the view that the parking space requirements are unclear for incremental school site development as a result of roll growth.
- 3.6 Rule 13.1.1.1 is unclear, except for when there is a new activity as to when it is triggered and enforced. There is uncertainty how roll growth will be taken into account and also how additional classrooms located on-site will be addressed.
- 3.7 The reasoning of Rule 13.1.1.1 states that the provision for one space per staff member is considered necessary for existing schools where it is considered particularly important that any additional adverse effects associated with on-road parking are avoided. The Ministry consider this reasoning unrealistic as existing schools have a finite land capacity and the number of car parks at existing schools is more often than not at capacity, there is generally no physical room for further car parks and this matter needs to be clarified.

Objectives and Policies

- 3.8 Overall, the Ministry is supportive Objectives B2.1.2 – B2.1.3 as they are of importance in contributing to the safety and ease of movement of pedestrians, cyclists, and motorists to and from schools.
- 3.9 The Ministry is very supportive of Policy B2.1.6(c) as it allows for the use of initiatives which can reduce parking demand, however, it recognises that such initiatives can be difficult to implement and enforce. Therefore, they should only be considered where: the proposed initiative is suitable for the nature of the activity; there is a high probability that the available alternatives can reduce parking demand, and; that the initiatives are suitably designed and conditioned so that they are enforceable by Council.
- 3.10 This is a key policy that the Ministry supports as they wish to promote and provide for sustainable alternative modes of transport and this can be done through the preparation of travel management plans where appropriate. This is also important where the Ministry seeks a reduction in the number of car parks required in the District Plan in favour of promoting alternative transport modes to school and maintaining amenity standards at schools.
- 3.11 The Ministry supports Policy B2.1.7, Policy B2.1.14 and Policy B2.1.17 as it aims to contribute to the safety and ease of movement of pedestrians, cyclists, and motorists to and from schools. The Ministry are supportive of these Policies as it is consistent with their policy of promoting alternative modes of transport.
- 3.12 The Ministry supports Policy B3.4.18 (b) as it promotes pedestrians and cyclists over the number of car parks required. The Ministry are supportive of these Policies as it is consistent with their policy of promoting alternative modes of transport.

4. The Ministry seek the following decision from the consent authority:

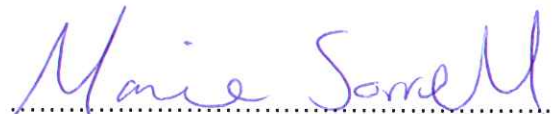
In general the Ministry are supportive of Proposed Plan Change 12 to the Selwyn District Plan. The Ministry seek the following relief:

- Consideration needs to be given to legislative changes to the legal driving age and implications of this on educational car parking requirements.
- Reduction in the car parking requirements for 'Educational Activities' or alternatively reassurance that a reduction in car parking numbers would be acceptable if a travel management plan was in place for schools.
- Clarification is required on the mobility impaired car parking requirements.

- Clarification on the application of the car parking requirements for the roll growth or expansion of existing schools is required.
- The Ministry is generally supportive of the objectives and policies contained in the proposed plan change and in particular Policy B2.1.6(c) regarding initiatives to reduce car parking demand.

5. The Ministry do wish to be heard in support of their submission.

6. If others make a similar submission the Ministry will consider presenting a joint case with them at the hearing.



Marie Sorrell
Resource Management Planner
Opus International Consultants
As duly authorised agent for and on behalf of
the Ministry of Education

Date:

Name and address for correspondence:

Opus International Consultants Limited
Attn Marie Sorrell
PO Box 1482
Christchurch

Ph: (03) 363 5442
Fax No: (03) 365 7858
Email: marie.sorrell@opus.co.nz

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