

## Memorandum

To: Selwyn District Council – Hearing Panel

From: Richard Turner on behalf of Ryman Healthcare Limited and the Retirement Villages Association of New Zealand

Date: 20 September 2021

Re: Proposed Selwyn District Plan - High Trip Generating Activities

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## INTRODUCTION

Ryman Healthcare Limited (“**Ryman**”) and the Retirement Villages Association of New Zealand (“**RVA**”) each made a submission<sup>1</sup> on the transportation chapter of the Proposed Selwyn District Plan (“**Proposed Plan**”). In particular, the submissions requested that TRAN -TABLE2 (“**Table 2**”) be amended to specifically exclude retirement villages from being included within the category of ‘*high trip generating activities*’ – such that resource consent applications for retirement villages would not be subject to the requirement to prepare an integrated transport assessment.

## SUBMISSION OVERVIEW

Table 2 of the transportation chapter of the Proposed Plan currently outlines thresholds for ‘*high trip generating activities*’ and the requirements for the preparation of integrated transport assessments as part of preparing resource consent applications. As notified, Table 2 groups all residential activities (including retirement villages) under the same thresholds for high trip generating activities - meaning retirement villages would be subject to the same integrated transportation assessment requirements as other forms of residential development.

Given that retirement villages do not have the same trip generation profiles as other residential developments the submissions by Ryman and the RVA sought to exclude retirement villages from being considered as high trip generating activities.

## SECTION 42A REPORT

I understand that the Selwyn District Council have commissioned Abley Limited to review selected submission points of the transportation chapter of the Proposed Plan.<sup>2</sup> As part of this review, Abley confirmed that retirement villages have a significantly reduced trip generation profile compared to a typical residential dwelling or unit. Therefore, the integrated transport assessment thresholds are

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<sup>1</sup> Submissions 0424 and 0425.

<sup>2</sup> Proposed Selwyn District Plan Transport Feedback Review, prepared by Shane Ingley of Abley Limited, dated 3 September 2021.

unable to be fairly applied to retirement villages. Abley also indicated that retirement villages would still be subject to the peak hour high trip generation activity thresholds for 'all other activities'.

In light of the above, Abley recommended to specifically exclude retirement villages from being considered high trip generating activities (aligning with the relief requested in the submissions by Ryman and the RVA).

Based on Abley's recommendations, the Reporting Officer has recommended that the submissions by Ryman and the RVA be accepted, as highlighted in section 11.29.3 of the section 42A report as follows:

*"In respect of retirement villages, Abley concur that retirement villages have a different trip generation profile to other residential activities. Based on NZ Transport Agency Research Report 453<sup>116</sup>, retirement villages appear to have units that have half the peak hour trip generation of a typical dwelling or unit. The threshold for residential units are considered to be too low to apply fairly to retirement villages and therefore should be excluded from residential activities. They would however be captured as 'all other activities' and subject to peak hour thresholds. I agree with Abley's recommendation."*

## **RESPONSE**

Ryman and the RVA have advised that the recommendation of the Reporting Officer to exclude retirement villages from the high trip generating activity category in Table 2 of the transportation chapter of the Proposed Plan is supported. They agree that peak hour trip generation from retirement villages is significantly less than that of a typical dwelling or unit – such that they do not appropriately qualify as high trip generating activity category.

In light of the above, Ryman and the RVA support the recommendation of the Reporting Officer being accepted in relation to the above matter.