

Form 5

Submission on publicly notified application concerning resource consent under Section 96, Resource Management Act 1991

To: Selwyn District Council

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

Address for service: C/- Beca Ltd
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Description of activity

This is a submission on the proposed Subdivision Application and Residential Land Use Application Springston Rolleston Road Rolleston, Lot 2 DP 61162.

Kevler Development Limited lodged a resource consent application with the Selwyn District Council for a site to be subdivided into 270 single residential allotments with associated roading, landscaping and earthworks in 27 stages with non-complying lot sizes for the Inner Plains zone.

In addition to the aforementioned subdivision consent, land use consent is sought for the proposed dwellings on the allotments, and to address the volume of earthworks to be undertaken on site.

The general details of the proposal are outlined below:

- Subdivision creating 270 residential lots in the Inner Plains zone, with non-compliances relating to density standards, access, earthworks, allotment size, site coverage, building position, road engineering, accessway and crossings standards for the Inner Plains Zone with an average lot size well under 4ha being 391m².
- The subdivision will be undertaken in 27 stages, which will be completed incrementally.
- The application site is currently 2 empty paddocks and is situated on the southern verge of Rolleston township as illustrated in Figure 1.
- The proposed subdivision will require significant earthworks including 10,000m³ of cut to fill and 30,000m³ of cut.

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 Selwyn District Plan. The proposed subdivision is within the enrolment scheme zones of Lemonwood Grove School and Rolleston College and is located within the existing urban limit as well as within the Projected Infrastructure Boundary (Map A) within the Canterbury Regional Policy Statement (CPRS) shown in Figure 1 below:

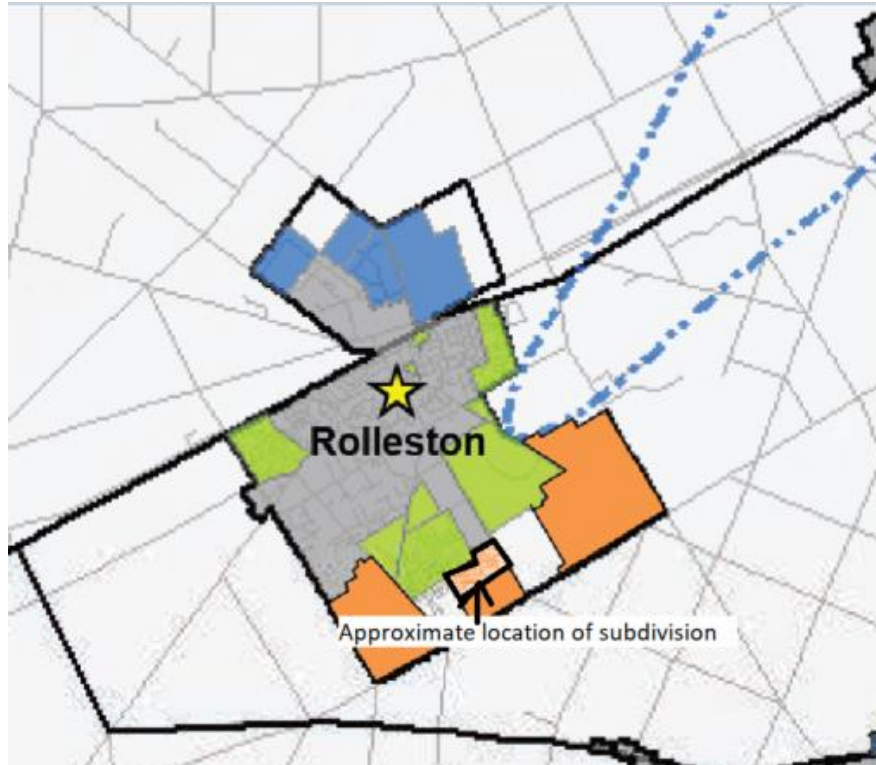


Figure 1: Projected Infrastructure Boundary (Map A) within the Canterbury Regional Policy Statement (CPRS) and proposed subdivision location

As such, the development of this area has been factored into medium-long-term plans for education facilities in this area meaning capacity concerns have been factored into the Ministry's medium and long-term projections.

For the reasons outlined above, the Ministry has no concerns regarding the impacts of the proposal on school capacity within the relevant school enrolment zones.

The specific parts of the application that the Ministry of Education's submission relates to are:

Trip generation

The applicant's Transport Impact Assessment anticipates low impact from operational phase traffic, due to the roading layout and multiple access ways proposed. Stantec's traffic assessment assumes most of the traffic will be absorbed by the surrounding roads putting only minor pressures on surrounding intersections.

It is considered that the applicant's Transport Impact Assessment has not given full consideration to construction phase traffic associated with the proposed subdivision, particularly heavy vehicle movements,

and the effect this may have on the nearby schools.



Figure 2: Proposed subdivision's proximity to Schools

Construction effects

Due to the scale of the proposed subdivision, volume of proposed earthworks, and the subject sites proximity to the surrounding schools, construction phase effects such as noise, dust vibrations and movement of heavy vehicles may result in adverse effects,

The Ministry of Education's submission is:

The proximity of the proposed subdivision to Lemonwood Grove and Rolleston College has the potential to result in adverse effects on Lemonwood Grove and Rolleston College arising from the establishment of 270 residential lots. The Ministry has noted the potential effects on the Lemonwood Grove and Rolleston College as follows:

Additional Staging Information

Additional information regarding staging plans (including housing typology in each stage) and anticipated timing of stages should be provided to the Ministry and other agencies to inform plans for services that will be required by residents.

Traffic Effects

The Ministry has concerns that the application does not contain an adequate assessment of the effects associated with increase in total and peak time traffic movements post-construction of the subdivision.

Whilst the application and accompanying Transport Impact Assessment outlines the anticipated vehicle movements as a result of the increased density, no specific regard has been given to the effect of this on Lemonwood Grove and Rolleston College.

Additional information relating to the potential and actual effects of construction and operational phase traffic should be provided to Lemonwood Grove School and Rolleston College to adequately inform students and their families of the increased traffic movements.

Construction Phase Effects

The Ministry has concern that the application does not contain an adequate assessment of construction phase effects. Due to the scale and location of the proposed subdivision it is not fanciful to consider that high heavy vehicle movements will likely be required over the duration of the construction period resulting in traffic safety and traffic noise effects.

In addition to this, the construction of the subdivision and associated roading, landscaping and earthworks may result in dust, noise, and vibration effects that have the potential to adversely affect the rangatahi and kaiako at Rolleston College and Lemonwood Grove School.

Due to the proximity of the application site to Rolleston College and Lemonwood Grove School, the Ministry also seeks further information regarding the proposed timing and duration of construction to allow for adequate consideration of the effects on Rolleston College and Lemonwood Grove School.

The Ministry of Education seeks the following decision from the consent authority:

- That further information is provided regarding potential and actual construction effects including, but not limited to:
 - Dust
 - Vibration
 - Noise
 - Heavy Vehicle Movements
- Prior to consent being granted, a Construction Management Plan and Erosion and Sediment Control Plan should be provided to Council.
- To ensure any potential and actual adverse effects relating to traffic safety are appropriately mitigated, the Ministry seeks the inclusion of a condition requiring submittal of a traffic management plan which details effect and mitigation of heavy vehicle movements impact through the following condition:
 - a. Trucks will not use Springston Rolleston Road, Broadlands Drive or Lemonwood Drive route to or from the Application site between 8.15 am -9.15 am and 2.45 pm - 3.25 pm. During those times trucks would use an alternative route.
- Applicant provides an amended traffic assessment which gives specific regard to the effect of the increased total and peak hour traffic movements on Lemonwood Grove and Rolleston College.
- The applicant provides a staging plan demonstrating indicative timing of each stage.

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

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