

I hereby give notice that a hearing by commissioners will be held on:

Date: Tuesday 2 August 2022
Time: 9.30am
Meeting Room: Council Chambers
Venue: Ground Floor, Auckland Town Hall,
301 Queen Street, Auckland

HEARING REPORT
NOTICE OF REQUIREMENT
56 MIDDLEFIELD DRIVE, FLATBUSH
MINISTRY OF EDUCATION

COMMISSIONERS

Chairperson Janine Bell
Commissioner Trevor Mackie

Laura Ager
KAITOHUTOHU MATAAMUA WHAKAWĀ
SENIOR HEARINGS ADVISOR

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Note: The reports contained within this document are for consideration and should not be construed as a decision of Council. Should commissioners require further information relating to any reports, please contact the hearings advisor.

WHAT HAPPENS AT A HEARING

Te Reo Māori and Sign Language Interpretation

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

Hearing Schedule

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

Cross Examination

No cross examination by the requiring authority or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the requiring authority or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

The Hearing Procedure

The usual procedure for a hearing is:

- **the chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- The Requiring Authority (the applicant) will be called upon to present their case. The Requiring Authority may be represented by legal counsel or consultants and may call witnesses in support of the application. After the Requiring Authority has presented their case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
 - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
 - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- The **requiring authority** or their representative then has the right to summarise the application and reply to matters raised. Hearing panel members may ask further questions. The requiring authority's reply may be provided in writing after the hearing has adjourned.
- **The chairperson** will outline the next steps in the process and adjourn or close the hearing.
- The hearing panel will make a recommendation to the Requiring Authority. The Requiring Authority then has 30 working days to make a decision and inform council of that decision. You will be informed in writing of the Requiring Authority's decision, the reasons for it and what your appeal rights are.

**A NOTIFIED NOTICE OF REQUIREMENT TO THE AUCKLAND COUNCIL UNITARY PLAN
BY MINISTRY OF EDUCATION**

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Vanessa Leddra, Planner

Reporting on proposed Notice of Requirement for an alteration to a designation for a primary school and early childhood education centre to alter the purpose and conditions of the designation (relating to roll cap and transport/traffic) at 56 Middlefield Drive, Flatbush.

REQUIRING AUTHORITY: MINISTRY OF EDUCATION

SUBMITTERS:	
Page 171	Jennifer Long
Page 174	Andrew Dixon
Page 177	Auckland Transport c/- Jason Ashby

Notice of requirement under section 181(2) of the RMA by the Minister of Education for an alteration to an existing Designation, 5007 at Willowbank School, Middlefield Drive, Flat Bush.



To: Hearing Commissioners

From: Vanessa Leddra,
Policy Planner, Central / South
Plans and Places

Report date: 23 June 2022

Scheduled hearing date: TBC

Notes:

This report sets out the advice of the reporting planners.

This report has yet to be considered by the Hearing Commissioners delegated by Auckland Council (the council) to make a recommendation to the requiring authority.

The recommendations in this report are not the decisions on the notice of requirement.

A decision on the notice of requirement will be made by the requiring authority after it has considered the Hearing Commissioners' recommendations, subsequent to the Hearing Commissioners having considered the notice of requirement and heard the requiring authority and submitters.

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Summary

Requiring authority	Ministry of Education
Notice of requirement reference	Alteration of Designation 5007 at Willowbank Primary School for education purposes – primary school [years 0-8] and Early childhood education [ECE]
Resource consent applications	No resource consent applications have been lodged by the requiring authority for this project.
Reporting planner	Vanessa Leddra, Policy Planner Central / South
Site address	56 Middlefield Drive Flat Bush.
Lodgement date	12 January 2022
Notification date	27 January 2022
Submissions close date	25 February 2022
Number of submissions received	Total: 3

Report prepared by:

Vanessa Leddra,
Policy Planner
Central / South

Date:

23 June 2022

Reviewed and
approved for release
by:

Craig Cairncross
Team Leader Central
/ South

Date:

23 June 2022

Abbreviations

AEE	Notice of Requirement & Assessment of Environmental Effects Report for the Minister of Education for an Alteration of Designation [5007] at Willowbank Primary School, Middlefield Drive, Flat Bush.
ECE	Early Childhood Education centre
AT	Auckland Transport
AUP	Auckland Unitary Plan (Operative in Part)
NoR	Notice of requirement
OPW	Outline plan of works
PUDO	Pick Up Drop Off
RMA	Resource Management Act 1991 and all amendments
NPS:UD	National Policy Statement Urban Development
MDRS	Medium Density Residential Standards
the council	Auckland Council
MoE	Ministry of Education
TA	Transport Assessment
MHS	Mixed Housing Suburban zone

1 Introduction

1.1 The notice of requirement

Pursuant to section 181 of the RMA, the Minister of Education as the requiring authority, has lodged a notice of requirement (NoR) for an alteration to Designation 5007 in the Auckland Unitary Plan (operative in part) (AUP) at Willowbank Primary School, Middlefield Drive, Flat Bush.

1.2 Locality plan

The location of the project is shown on Figure 1 below.

Figure 1 – Aerial photograph of subject site and local area



1.3 Notice of requirement documents

The lodged NoR consists of the following documents:

- Form 18, Notice of Requirement, signed by Brian Mitchell, (Group Manager National Property Services, Education Infrastructure Service) Ministry of Education on 17 November 2021
- Notice of Requirement & Assessment of Environmental Effects Report for the Minister of Education for an alteration of designation 5007 under s181 of the RMA: Willowbank Primary School, Middlefield Drive, Flat Bush (AEE) by Incite, dated 11 January 2022.
- Existing Special Designation Conditions [Appendix A]
- School Master Plan [Appendix B]
- Abley Transport Assessment [Appendix C] dated 10 January 2022
- Willowbank School 2000 Environment Court Consent Order [Appendix D]
- Existing Standard Designation Conditions [Appendix E]
- Certificate of Title [Appendix F]
- Email dated 18 January 2022 from Emma Howie MoE – staff numbers [existing and projections]
- Email from Chris Horne [Incite] dated 25 January 2022 clarifying minor typographical errors in lodged documents

The documents are included in Attachment 1.

1.4 Section 92 requests and responses

Section 92 of the RMA allows councils to request further information from a requiring authority and/or commission a report, at any reasonable time before the hearing.

The council made further information requests on 9 December 2021 and received responses on 12 January 2022 as part of the resubmitted lodgement documents.

The council's section 92 request and responses are included in Attachment 2.

1.5 Specialist reviews

The assessment in this report takes into account reviews and advice from Mr Wes Edwards, Arrive Ltd, the technical specialist on transport, engaged by the council.

This specialist review is included in Attachment 3.

2 Notice of requirement description

2.1 Background

The Minister lodged a NoR for the designation of a new school in early 2000. The MoE decided to confirm this, subject to conditions, in June that year. However, this was appealed to the Environment Court by one of the submitters who lived to the east of the school site.

To enable the school to meet the desired opening date of 2001 to meet demand in the area, the Minister agreed to settle the appeal by consent order by adding a roll cap condition as follows"-

"The school will have a maximum roll of 540 pupils provided that the roll will not be able to exceed 540 pupils up to a maximum of 700 pupils for a period not exceeding three years".

In the AEE, the MoE state that in the Environment Court consent order [see Appendix D to the AEE] confirming the designation, the Minister "did not agree that this condition was necessary or appropriate and reserved the right to seek deletion of the condition at a later date"

The MoE advise in 3.0 of the AEE that the school's infrastructure has been implemented since then, via the outline plan process. The last outline plan to add classroom space allowed classrooms to open in 2009. The local residential school catchment has grown significantly since then and there continues to be demand for schooling in the area. The MoE indicate that the current roll is approx. 800 students, which exceeds the roll cap. The MoE state "removal of the roll cap is necessary to regularise the existing roll and to enable growth as envisaged for the master plan". Although the removal of this condition was always the MoE's intention, this has not been followed through until this application. A master planning exercise has been undertaken to accommodate a roll of 900 students.

Apart from the roll cap condition, standard conditions for schools designated in the AUP apply, including car parking.

The background to this alteration to Designation 5007 is set out in detail in section 3.0 of the AEE.

2.2 Proposal

The proposed alterations to the designation are described within Form 18 and section 5.0 of the AEE and is summarised briefly as:

- to remove special condition 1 to enable the school roll to exceed the current roll cap
- changes to the designation purpose including removal of Early Childhood Education Centre on the site
- alterations to standard parking conditions
- inclusion of special conditions relating to transportation matters including design of car parking, onsite pick up/drop off and pedestrian connections, provision of school travel plan

2.3 Affected land

Form 18 and the section titled Overview in the AEE provides the legal description of the land subject to the NoR. This is described as section 1 Survey Office Plan 69890 [Title 871531] and is approximately 2.55ha in area. The Certificate of Title is included as Appendix E of the lodged documents.

The address of the school is formally known as 56S Middlefield Drive, Flat Bush.

No changes to the existing designation boundaries are proposed.

2.4 Site, locality, catchment and environment description

This report relies on the site and environment descriptions provided by the requiring authority as set out in section 2.0 of the AEE supporting the NoR.

2.5 Other designations, notices of requirement and consent applications.

The land within or adjoining the NoR is not subject to other existing designations or notices of requirement. At the time of writing there are no consent applications or unimplemented resource consents on the subject site or any adjacent site.

3 Notification and submissions

3.1 Notification

The NoR was publicly notified on 27 January 2022 and the closing date for submissions was 25 February 2022.

3.2 Submissions

Three submissions were received from:

- Two local residents at 93C Gracechurch Drive and 63 Middlefield Drive
- Auckland Transport

Copies of submissions are included in Attachment 4.

The issues raised in submissions are addressed in section 4.3.5 of this report.

4 Consideration of the notice of requirement

4.1 Designations under the Resource Management Act 1991

The RMA provides that the procedures adopted in processing a notice of requirement are generally those adopted for processing a resource consent application. This includes lodgement, requiring further information, notification, receiving and hearing of submissions. In respect of this NoR, all of those procedures have been followed.

The procedure differs from the resource consent process in respect of the council consideration of the NoR. Section 171(1) of the RMA states:

- (1) *When considering a requirement and any submissions received, a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to—*
 - (a) *any relevant provisions of—*
 - (i) *a national policy statement;*
 - (ii) *a New Zealand coastal policy statement;*
 - (iii) *a regional policy statement or proposed regional policy statement;*
 - (iv) *a plan or proposed plan; and*
 - (b) *whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if—*
 - (i) *the requiring authority does not have an interest in the land sufficient for undertaking the work; or*
 - (ii) *it is likely that the work will have a significant adverse effect on the environment; and*
 - (c) *whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*

- (d) *any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.*

Section 171(1)(a) is addressed in sections 4.4 to 4.9 below. Section 171(1)(b) is addressed in section 4.10 below. Section 171(1)(c) is addressed in section 4.11 below. Section 171(1)(d) is addressed in section 4.12 below.

Section 171(1) is subject to Part 2 of the RMA. Part 2 contains the purpose and principles of the RMA. It has been confirmed by the Environment Court that, in relation to a designation matter:

...all considerations, whether favouring or negating the designation, are secondary to the requirement that the provisions of Part II of the RMA must be fulfilled by the proposal.¹

After considering these matters, the council needs to make a recommendation to the requiring authority under section 171(2) of the RMA which states:

- (2) *The territorial authority may recommend to the requiring authority that it –*
- (a) *confirm the requirement:*
 - (b) *modify the requirement:*
 - (c) *impose conditions:*
 - (d) *withdraw the requirement.*

Reasons must be given for the recommendation under section 171(3) of the RMA. Refer to section 6.1 below for my recommendation.

4.2 Consideration of submissions and Local Board Views

4.2.1 Submission assessment

Submission 1 – Jennifer Long 63 Middlefield Drive

The submitter generally opposes the notice of requirement but also has concerns and questions regarding the proposal including:

- already has difficulty exiting their property and into Middlefield Drive traffic and the proposed relocation of the pedestrian crossing will make this worse [will have to account for pedestrians crossing the road as well as cars]
- what is the point of the new car park being relocated on the existing playground – for 6 carparks and a decreased functionality with double stacking layout
- wants to be kept informed of updates especially with regard to the new pedestrian crossing

¹ See Estate of P.A. Moran and Others v Transit NZ (W55/99)

- safety concerns around the stairs at the central [main] entrance
- parking survey only started at 2.55 pm whereas given the demand to secure on street parking, parents arrive early for pick up
- proposed increase in teachers/students is not reflected in school resources and classrooms
- limited space for children to wait to be picked up is identified in the TA but not mitigated and will be worse with more students
- staff were not included in travel survey
- staff should be encouraged to use active modes of transport/ public transport/car pooling
- parking and drone surveys are not representative as they were undertaken when parts of the school were closed [Covid-19 impact]
- does not agree with statement “ *Middlefield Drive outside the school has parking in one side of the road only. The road width on Middlefield Drive is wide enough to allow for traffic to flow comfortably in both directions when parking is occupied on one side of the road. This was also observed from the drone surveys.*” The submitter also states that the road is not wide enough for traffic to flow in both directions with parking on one side and often with poor driving
- lack of pre lodgement consultation

The submitter seeks the following relief:

- that tracking assessment must be undertaken to show that reverse manoeuvring will not conflict with the pedestrian crossing
- that the new pedestrian crossing on Middlefield Drive be relocated as far as possible from 63 Middlefield Drive
- that a raised speed table would be an improvement rather than a new pedestrian crossing – speed calming measures are better
- that staff should be encouraged to use active modes of transport/ public transport/car pooling
- that their property remains accessible and not impacted during and after construction.

Officer comment:

This submission substantially relates to traffic and transport matters, and these matters are addressed in section 4.3.5.2 of this report.

In terms of the submission as it relates to lack of pre-consultation, the MoE have confirmed that they “made the best endeavours to get the right information” to engage with the community. MoE requested ratepayer addresses from the Council for over 60 neighbouring properties. However, the name stated for 63 Middlefield Road is different to the submitter, so the MoE reports that they were unaware of the submitters’ interest in the application.

Submission 2 – Andrew Dixon 93C Gracechurch Drive

The submitter generally opposes the notice of requirement including:

- the removal of the roll cap is because of the flow on effects relating to traffic issues and the need for more classrooms
- reference is made to previous submissions and discussions with the MoE and consultants and alternative solutions being proposed which in the submitter’s view, will deliver better outcomes for the school and neighbours

Traffic issues

- concern about potential serious accidents given driver behaviour and near misses and the increased school roll will increase traffic incidents
- the TA seems to be based on data collected on one day and is not a true representation of the usual traffic position around the school
- the proposed traffic plan will not improve the situation by risks further congestion on nearby intersections

Proposed Build Plan

- the proposal to locate multi-level classrooms adjacent to the school boundaries closest to residential neighbours
- the impact on the neighbours has not been a priority design consideration – there are other options [good for the school, less disruptive, less costly and less impact]
- proposed layout will have an impact on sun, views and property value

The submitter seeks the following relief:

- That neighbour consultation is sought prior to the finalisation of any building plan to ensure that multi-level buildings are located away from residential boundaries

Officer comment:

Insofar as this submission relates to traffic and transport matters, these are addressed in section 4.3.5.2 of this report.

In terms of visual and amenity effects, this is addressed in section 4.3.5.1 of this report. In 6.1 of the AEE the MoE comment that “no detailed design work for the site such as building layouts... have been undertaken. Future development and outline plans for work will be guided by the Stage 1 development plan and school master plan as included in Appendix B [of the lodged documents]. It is noted that there is no requirement to consult the submitter/neighbour at outline plan stage in terms of the RMA.

Submission 3 – Auckland Transport

AT supports the NOR, subject to the matters raised below being addressed to ensure that any adverse transport effects of the proposal are avoided, remedied or mitigated. The specific matters that AT’s submission relate to and support, along with amendments. These relate to wording of conditions and relate to: -

- On-site car parking [retain condition 1 as set out in Form 18]
- On site pick-up and drop-off [retain condition 2 of TA as worded, retain condition 3 with amendments to include ongoing review of its operation]
- School Travel Plan [including reviews and updates where necessary and monitoring within 6 months of the opening of additional teaching spaces and reference to active modes

Officer comment:

The MoE have consulted with AT on the proposal throughout the process and amendments and feedback have been considered. AT recognise and are appreciative that the MoE have incorporated changes to the Form 18 designation conditions and accompanying TA in response to matters both raised prior to and after lodgement.

I understand that following these discussions between the MoE, Abley, [MoE’s traffic consultants] and the Council’s traffic consultant [Mr Wes Edwards], agreement on proposed conditions has been reached. This report and its considerations therefore address the concerns raised by AT in section 4.3.5.2 of this report.

Local Board Views

The Howick Local Board gave consideration to providing their views on the NoR at their meeting on 21 April 2022. Detail on this is provided in Attachment 4 to this report with the resolutions being as follows: -

That the Howick Local Board:

a) *with regards to additions to height of school buildings:*

i. *has no objection to two storied buildings provided that:*

A) *Height to boundary rules are observed particularly in relation to neighbouring residential properties; and new buildings are located as far away from these properties as possible.*

B) Classrooms are double glazed to minimize noise. We note it is reasonable for residents living close to schools to expect some noise before and after school, during breaks; and during outdoor education.

b) with regards to adding buildings to school property:

i. recommends that maximum outdoor space is retained for play and other outdoor activities

c) with regards to vehicular road safety:

i. notes the following points:

A) that Willowbank Primary School is located in the centre of an active and growing residential area.

B) both Middlefield Road and Gracechurch Drive are well used by motorists travelling in and out of the area. School traffic is seen to impede the flow.

C) that a high percentage of Willowbank Primary School students are driven to and from school.

D) that a high percentage of children being driven to and picked up from school brings an excessive number of vehicles to the area making it dangerous for pedestrians.

E) that the school is poorly located with entry to the administration block located on Middlefield Road - a narrow street which is congested on a daily basis around school start and finish times.

F) that entry to the "drive-in drop-off" area, and to staff parking is located almost on top of a school crossing in Middlefield Road. This brings consistent conflict with parents dropping off students; pedestrians crossing the road; school patrollers seeking visibility; parents wanting to access the school office; parents waiting for children; and other commuters attempting to leave their houses/commute.

G) that drive in/drop off's can often present problems with vehicles blocking the drive-through to drop off or to wait for children; or so that driver can visit the office. This often requires teachers to "man" the area at a time they should be in the classroom. They are also subject to verbal abuse when they ask drivers to move along.

H) queueing to enter the drive in/drop off significantly impedes the traffic flow in Middlefield Rd.

ii) recommends discouraging the practice of children been driven to and from school, by:

A) establishing no drop off/pick up zone within 50 metres of the school.

B) better educating parents; and encouraging parents to use and support walking school buses, and walking to school.

- C) *promoting walking to school as an integral part of the school culture as “the primary way of getting to and from our school”.*
- d) *with regards to pedestrian road safety:*
- i. notes the importance of well placed, safe and visible pedestrian crossings, as there is a tendency to cross “for convenience” rather than walking to safe supervised crossing points.*
- ii. recommends assisting pedestrian safety by:*
- A) *ensuring that school crossings are well placed to accommodate main walking routes.*
- B) *installing crossings that are raised and visible, and designing a surrounding area that is open, and well-marked to both eliminate and prohibit stopping or parking on both sides and will provide broad visibility to road patrollers and students.*
- C) *continued use of walking school buses, and implementation of a roster of parents to walk children from other neighbourhoods - either to school or to where they can join a walking school bus. NOTE: Often Grandparents or local service club members are often happy to assist in these roles.*
- e) *recommends the further following points with regards to road safety:*
- i. that a school speed limit of 40km/h be enforced within 50m of school.*
- ii. that consideration be giving to making Middlefield Road ONE WAY between Gracechurch Drive and Point View Drive or Heyington Drive.*
- iii. that Willowbank Primary School should continue with ongoing education of both pupils and particularly parents, and support this with enforcement input from Auckland Transport and NZ Police.*
- f) *appoint a local board member to speak to the local board views at a hearing [if one is held] on the Notice of Requirement*
- g) *delegate authority to the chairperson of Howick Local Board to make a replacement appointment in the event the local board member appointed in resolution b) is unable to attend the private plan change hearing.*

I will deal with each of the items in order.

- a) (i) A and B and b) (i) are matters which will be dealt with at Outline Plan stage. As the site is located in a Mixed Housing Suburban [MHS] zone², the AUP has objectives and policies for non-residential activities³ which are in keeping with the scale and intensity of development in the zone and avoiding remedying or mitigating adverse effects on residential amenity. This is also addressed in sections 4.3.5.1 and 4.9 below.
- c) (i) A, B, C and D are noted. E, F, G and H (ii) A,B and C are addressed in section 4.3.5.2 below and proposed site-specific conditions
- d) (i) (ii) A, B and C are addressed as part of section 4.3.5.2 below and proposed site-specific conditions
- e) (i) (ii) and (ii) are noted but are outside the scope of this alteration to an existing designation
- f) nd (g) are noted

I understand that MoE have met with the Chair of the Howick Local Board to discuss these matters and further consideration of these will be provided at the Hearing by the Chair of the Local Board.

4.3 Effects on the environment

4.3.1 Effects to be disregarded – trade competition

I do not consider that there is any trade competition effects that should be disregarded.

4.3.2 Effects that may be disregarded – permitted baseline assessment

The permitted baseline refers to the adverse effects of permitted activities on the subject site.

The Environment Court in *Beadle v Minister of Corrections* A074/02 accepted that the obligation to apply permitted baseline comparisons extended to Notices of Requirement. In *Nelson Intermediate School v Transit NZ* (2004) 10 ELRNZ 369, the Court accepted that the permitted baseline must define the “environment” under section 5(2) (b) and (c) and from that section 171(1). When considering the adverse environmental effects of a proposal, the effects may be considered against those from permitted baseline activities. As the effects resultant from permitted baseline activities may be disregarded, only those environmental effects which are of greater significance need be considered.

² See sections 4.5 and 4.9 in this report for discussion on Council's preliminary response and information on MDRS

³ See AUP **H4.2(4)** and **H4.3 (9)**

In *Lloyd v Gisborne District Council* [2005] W106/05, the Court summed up the three categories of activity that needed to be considered as part of the permitted baseline as being:

1. What lawfully exists on the site at present
2. Activities (being non-fanciful activities) which could be conducted on the site as of right; i.e., without having to obtain a resource consent (see for example *Barrett v Wellington City Council* [2000] CP31/00).
3. Activities which could be carried out under granted, but as yet unexercised, resource consent.

Application of the permitted baseline approach is optional depending on its merits in the circumstances of the NoR.

In this case, this NoR is for an alteration to an existing designation relating to the school roll cap being removed, along with the introduction of a number of special conditions in relation to transportation matters. This will assist with managing the effects of a larger student roll and the removal of the ECE from the purpose of the designation.

Furthermore, all new educational buildings are a Discretionary Activity in the Mixed Housing Suburban Zone [MHS] in which the site is located. Schools would continue to be a Discretionary Activity in the Mixed Housing Urban zone – modified – the zone for this site proposed under the council’s preliminary response to the NPSUD.⁴

Suburban residential areas are typical locations for schools throughout the country.

The permitted baseline approach is therefore not appropriate in terms of considering matters relating to buildings, such as design and amenity.

Addressing permitted baseline matters is not particularly helpful for consideration of the subject NoR.

4.3.3 Effects that may be disregarded – written approvals.

Any effect on a person who has given written approval to the notice of requirement may be disregarded if it is appropriate to do so. No written approvals were included in the notice of requirement.

⁴ See sections 4.5 and 4.9 in this report for discussion on Council’s preliminary response and information on MDRS

4.3.4 Positive effects

The AEE describes the positive effects of the project which are summarised in sections 3.0 and 4.0 of the AEE. The conclusion of the AEE [section 11.0] states that “the designation conditions changes will enable the continued delivery of essential community infrastructure to support population growth in the area and will support travel demand management measures by providing for the opportunity for students to attend schooling in their local area”.

I agree with this assessment of the positive effects of the NoR and consider that there are community benefits for/with the existing school responding to growth in the area and to continue to serve the schooling needs in the area, particularly given the residential intensification changes as a result of the NPSUD. This includes the potential for community use of the school as well as the wellbeing benefits relating to social networks between families in the area. I consider this to be a pragmatic approach and necessary, in order to acknowledge the existing roll and enable growth.

4.3.5 Adverse effects

Effects on the environment are addressed in section 7.0 of the AEE.

A Master Plan, with various options/stages [see appendix B of the lodged documents] and a Transport Assessment [see appendix C of the lodged documents] for future roll growth changes is provided as supporting information for assessment of the effects of the proposal.

The MoE states “As the school already exists, the assessment of effects focusses on changes enabled by the changes in conditions relating to accommodating more built form on the site, and the transport effects associated with enabling a higher student roll”.

The following discussion addresses effects in the same order they are addressed in the AEE with an additional matter at the end. The specialist report from Council’s consultant on traffic and transport matters [Mr Wes Edwards] is referred to and is included in Attachment 3. Submissions have also been considered and are referred to where relevant.

4.3.5.1 Visual and Amenity Effects

Requiring authority AEE

Visual and amenity effects are addressed in section 7.2 of the AEE.

The MoE state that “There is potential in the long term for existing classroom stock to be replaced with two-level school buildings in the future. These will remain subject to the existing height in relation to boundary controls, and the indicative orientation shown in master plan Options 3a and 3b would minimise the profile of the buildings in relation to adjacent residential sites and building ends would not need to include windows to protect privacy of adjacent dwellings. The detailed design and location of any future classrooms including orientation to adjacent residential land can be considered in future outline plans.”

The MoE also confirm that “Any future outline plans to add buildings to the site can consider whether any further landscaping is appropriate in the circumstances, depending on where new buildings are being constructed. As shown in the master plan, the visual relief from built form that is provided by the playing fields and other open spaces will be retained.”

In section 7.2, the MoE confirm that “the standard conditions for schools relating to visual amenity will continue to apply” and this includes aural residential amenity protection. [See Attachment E of the lodgement documents].

The MoE [in section 6.1 of the AEE] indicate that “the future development and outline plans for works will be guided by the Stage 1 development plans and school master plan as shown in Appendix B” [of the lodged documents]

Officer comments

No specialist has been appointed to provide visual and amenity advice for this NoR.

The MoE have undertaken master planning options which show there may be up to 6 additional classrooms to the site in the future [net increase]. The height of these new blocks is expected to be consistent with the built form of the underlying zone (8-9m). the standard designation condition for the height in relation to boundary will be retained and will ensure the relationship and interface of neighbouring property occupiers is appropriately managed.

I can confirm that the site is subject to standard conditions that apply to most school sites in Auckland with regard to height in relation to boundary controls and noise conditions.

Generally, I consider that the standard conditions [as set out in Attachment E of the lodgement documents] relating to all MoE designations would also apply to this designation. Conditions 1 [Height in relation to Boundary], 2 [Noise] and 6 [Outline Plans] are relevant in considering visual and amenity effects. These would apply except that where any standard conditions conflicts with a site-specific condition as discussed in section 4.3.5.2 and in Attachment 5 below. The site-specific conditions which take precedence relate to transport and traffic matters.

I consider that these standard conditions are appropriate to manage visual and amenity effects arising from the proposed alterations to the designation. I understand that any effects as a result of visual and amenity will be further assessed during the OPW and building consent stage to avoid any adverse effects in relation to these matters.

I agree with the requiring authority in that the OPW process is the appropriate time at which to assess the design elements of the development provided for by a confirmed designation. Designations provide flexibility for a requiring authority to be able to protect the land affected by the designation while still allowing for design changes to occur before construction of a public work, project, or work.

An OPW must show:

- the height, shape, and bulk of the public work, project, or work
- the location on the site of the public work, project, or work
- the likely finished contour of the site

- the vehicular access, circulation, and the provisions for parking
- the landscaping proposed
- any other matters to avoid, remedy, or mitigate any adverse effects on the environment.

An OPW must be submitted to the council before construction is commenced. This provides the council the opportunity to assess the 'Design Concept Plan' and to request changes to the OPW.

I agree with the MoE's assessment set out above and consider that there will be no more than minor effects related to proposed new school buildings given the above.

4.3.5.2 Transport and Traffic Effects

Requiring authority AEE and further information provided

Transport effects are addressed in section 7.3 of the AEE which refers to the MoE's Transport Assessment (TA) by Abley, attached as Appendix C as part of the lodged documents. Additional information was provided by the MoE in its response to a s92 request (Attachment 2).

In 7.3 of the AEE it states, "removal of the roll cap and a bespoke car parking condition are required to ensure that the school can serve student demand in the area and to ensure the site is efficiently utilised within practical space constraints without unnecessarily over supplying on-site car parking".

The AEE acknowledges that "The implication of unnecessarily constraining the roll of Willowbank School is that students will have to access schooling outside of their local area which may have adverse effects on the transport system ". However, the AEE notes that "the school Stage 1 development and master plan has been developed in consultation with Abley to properly consider the future design of on-site car parking, the on-site PUDO and pedestrian connections to the site." Proposed site-specific conditions "will ensure that these matters are appropriately considered in further school development to increase classroom numbers".

The TA reports on "the existing and future transport and parking demands for school staff, visitors and student pick-up and drop off".

The key findings, recommendations and conclusions are outlined in both Abley's TA/report. These are outlined below: -

- The crash history on the surrounding streets does not indicate a road safety issue in the area.
- The school is well serviced by public transport.
- The future stages of expansion of the school will include 13 Pick-up Drop off (PUDO) parking spaces.

- There is currently on-street parking capacity at school start and finish times, within a 200 metre walk to the school. The proposed PUDO spaces and the on-street parking capacity is considered to be sufficient to cater for the Masterplan school roll of 1000 students.
- The existing staff and visitor car park currently has some capacity. The additional car parking proposed as the school grows is considered appropriate.
- The stacked parking arrangement proposed at Masterplan Build is considered adequate and can be managed through the school office.
- Observation surveys did not raise any safety or operational issues on the surrounding streets during the busy school pick up / drop off period.
- The intersections on Middlefield Drive were observed to operate at a good level of service.
- Design changes to the PUDO and the on-street pedestrian crossings as outlined in Section 4.2 [of the TA] are considered acceptable.

The MoE proposes site specific conditions to address the potential effects of the school on the local road network, pedestrian safety, access arrangements, on site car parking and PUDO arrangements.

Specialist Review

The council's consultant Wes Edwards (Arrive Ltd) has reviewed the NoR and submissions and provided advice on the transport effects and proposed conditions. His report, dated 27 April 2022, is included in Attachment 3.

In his report, Mr Edwards provides a summary and review of the information provided with the application, the information received under s92 and the submissions relating to transport.

Mr Edwards initial comments relate to the effects of Covid 19 Health orders which have "significantly changed activity and transport patterns in the region" and he notes that has not been able to observe the operation of the local transport environment under normal conditions". It is noted that Willowbank School was operating with parents and caregivers not being able to enter the school grounds, including the vehicular pick-up and drop-off area. Mr Edwards comments that "for those reasons the observations and traffic conditions described in the TA are likely to represent fewer vehicle movements on the road network than would have occurred in the absence of the Health Orders and altered operation of the school facilities". Therefore, Mr Edwards' report is undertaken with the expectation that traffic conditions will return to normality in the short to medium term, and that any long-term or permanent effects on travel behaviour would have a relatively minor impact on congestion.

The key transport matters raised in Mr Edwards' review are:-

- (i) the ability for pedestrians and vehicles to safely access the site

(ii) the proposed provisions for parking of vehicles within the site

(iii) effects on the transport environment from additional traffic movements and parking demand

(iv) the provision of measures or controls to address any effects

Mr Edwards states that “ any increase in the school roll would generate a proportional additional demand for staff parking, pick-up and drop-off [PUDO] parking, and additional vehicle movements.

In terms of **vehicle movements**, Mr Edwards states that “The additional vehicle movements are unlikely to be sufficient to cause the nearby intersections to operate poorly; however, the increase in the roll would increase the volume of traffic passing along Middlefield Drive in the before-school and after-school periods.” He acknowledges that “Middlefield Drive is relatively narrow and experiences high levels of parking demand and pedestrian activity during school peak periods, and the increase in both traffic volume and parking demand would generate adverse effects on the safety and efficiency of Middlefield Dr at those times.”

In terms of the submission (i) relating to this, Mr Edwards acknowledges that the “the increased traffic would make it more difficult to enter and exit properties near the school, however, this is experienced for around one hour, twice a day on school days which limits the impact of this effect” Therefore he does not “consider that adverse effect on existing driveways to be severe”

The school is currently subject to a standard condition requiring a minimum number of parking spaces to be provided on the school site. As indicated above, a new site-specific condition is proposed with the same number of spaces but allowing spaces in the on-site PUDO area and [both parallel and stacked parking spaces to be included]. Mr Edwards considers that “The minimum number of parking spaces required is generally sufficient to accommodate staff parking demand” .

Mr Edwards notes that “As proposed the alteration does not require any changes to address the increase in demand for PUDO parking, and none are included in the indicative masterplan”. He also notes that this master plan may or may not be what is implemented.

In terms of the **proposed relocation of the pedestrian crossing** in Middlefield Drive, Mr Edwards considers that this could result in a reduction in the supply of on-street parking. Mr Edwards states that “the relocation of the pedestrian crossing is not required or enabled by the alteration, and the location of the relocated crossing is currently uncertain. The crossing relocation is subject to Auckland Transport approval, and ... [he] understands AT undertake consultation with potentially affected parties for such projects, and he expects that consultation would include the owners and occupiers of adjacent properties”.

In terms of the **transport assessment** Mr Edwards proposes an amended condition that requires a transport assessment to be provided with any outline plan that involves an increase in the number of classrooms. His concern is that “as proposed, other changes that could have an impact on transport matters would not be required to provide a transport assessment.”

In terms of the **school travel plan** Mr Edwards proposes an amended condition “to require the school travel plan to be maintained and updated” in the situation where changes to vehicle access, parking, vehicle circulation or an increase in the number of teaching spaces. Mr Edwards notes that the school already has travel plan in place and that “any new or improved management of PUDO parking could be realised in an updated plan”.

Mr Edwards confirms that “An assessment of effects on residential or other amenity arising from increased travel or parking demand is outside the scope of this report. With respect to the safe and efficient operation of the transport environment, ...[he] concludes the alteration as proposed would:

- provide sufficient parking to avoid any significant increase in demand for on-street parking generated by staff.
- generate a substantial increase (almost double compared with the existing roll cap) in the demand for on-street parking in the before-school and after-school periods.
- generate a substantial increase (almost double compared with the existing roll cap) in vehicle movements on Gracechurch Drive and Middlefield Drive

Generally, Mr Edwards concludes that “The traffic environment can accommodate increases in parking and travel demand with moderate adverse effects on safety and efficiency, and those effects are moderated by being confined to short periods of the day”. Similarly, Mr Edwards recommends some changes to the wording of conditions are recommended.

Mr Edwards acknowledges that “it may be possible to address some of the adverse effect in Middlefield Drive through changes to the design or operation of the school, or changes to the road network”. However, he concludes that these such measures are unlikely to be practical given it is an existing space constrained site.

In terms of addressing the submissions not already covered above, regarding:-

(a) the design of the car park, Mr Edwards states that “The rationale for the site design is a matter for the MoE.” He also notes that “The functionality of the stacked arrangement has been discussed elsewhere in his review” and this is outlined above

(b) the relocated pedestrian entrance, Mr Edwards notes that “the AUP does not have standards that control the location of pedestrian access points although any effects associated with this could be considered”. It must be noted that the MoE could change the access arrangements notwithstanding this alteration. although additional traffic movements, this is addressed above

(c) the limited pickup space, Mr Edwards was unclear about whether this related to space for children to be collected or for parents to pick up or both. However, Mr Edwards notes that the former could be managed by the school itself in terms of releasing children at different times. In terms of the latter, Mr Edwards notes that the school gates were closed when he visited the site. He also notes that parents do often arrive “well before their child is released and this may not make any difference to the demand for pickup parking”

(d) travel survey, Mr Edwards notes that “while the travel survey may not have been fully representative of normal conditions it is still useful for assessing the proposed amendment. As the proposal includes no additional on-site PUDO facilities, the trip generation and demand for on-street parking is likely to double compared with the current roll cap.” He therefore does not recommend any action to address this concern.

(e) staff travel, Mr Edwards notes that the school travel plan addresses encouraging of reduced car use.

(f) the width of Middlefield Drive. Mr Edwards has addressed this above. He notes that “any changes to the road centreline [i.e being relocated towards the school side of the road] to improve the passing of vehicles” would be a matter for AT to address.

(g) congestion at intersections . Mr Edwards states that “the nearby intersections are currently operating well during the before and after school periods, albeit with some minor queuing and delay” He acknowledges that “While an increase in the school roll would add traffic movements to these intersections, they are expected to continue to operate at levels that are at or better than levels typically adopted as design targets for peak periods. He concludes that the intersections are expected to operate satisfactorily and therefore does not suggest any amendments to the proposal.

In summary, Mr Edwards indicates that although “the alteration would produce adverse effects on the safe and efficient operation of Middlefield Drive in the before-school and after-school periods. During those periods, the adverse effects would be moderate, but as those periods are relatively short in duration, the overall effect is relatively minor”.

Overall Mr Edwards supports the alteration but with the proposed changes to site specific conditions.

Officer Comment

Based on the advice of Mr Edwards, the NoR documents, the proposed site-specific conditions and the alterations and additions to these conditions, I support the alteration to the designation as described elsewhere in this report.

Following exchanges through the section 92 process and during the designation process itself, further discussions occurred between the MoE, AT and the Council. Mr Edwards agrees with the conditions set out in Form 18 and supports the amendments sought by AT, however he also suggests further additions and changes to wordings of some conditions. A revised set of site-specific conditions have been proposed and these are set out in Attachment 5. I understand that AT, MoE and Mr Edwards are all in agreement with these recommended changes to site specific conditions.

In summary they relate to:-

- (i) Condition 1 [site specific condition] allows PUDO spaces to be included including the use of stacked parking and these are for the sole use of staff. Note The word parallel parking was removed so that any space in the PUDO area could be counted, not just parallel spaces.
- (ii) Condition 2 Transport Assessment – additions and alterations to the TA as other changes proposed [e.g increasing the number of classrooms] would have an impact on transport matters and needs to be included.
- (iii) Condition 3 – additions and alterations and to the School Travel Plan

The consistency of the proposed alteration in terms of the NPSUD, is discussed in section 4.5 and in section 6.2 of the AEE. The requirements for car parking [removal of minimums and relating to standard conditions] are addressed with the proposed site-specific conditions. The same number of spaces are to be provided with changes to the parking layout/area. I consider that the proposed changes and the impact of greater density as part of the NPSUD and the use of site-specific conditions is acceptable, and the effects of the proposal can be managed in terms of changes to density with the NPSUD and MDRS in terms of residential intensification and parking standards.

The MoE have confirmed in their email dated 8 June 2022 [see Attachment 6] their position regarding the Medium Density Residential Standards [MDRS] and the impact on this NoR. This is addressed in section 4.5 of this report with their conclusion below.

“The Ministry does not consider that the MDRS has direct implications for this notice of requirement. The proposal to remove the roll cap for Willowbank School assists the Ministry to accommodate any additional future roll growth. The additional site-specific conditions proposed to be inserted by this notice of requirement will ensure that any future outline plan process proposing increased teaching spaces is appropriately informed in terms of potential traffic effects by requiring the provision of a Transport Assessment and the review of the School Travel Plan”.

I rely on and accept the transport assessment of Mr Edwards. I agree that potential mitigation measures as outlined and discussed in Mr Edwards’ report [section 6.3] are either not practicable or unlikely given it is an existing school. I consider that the revised site-specific conditions will address the adverse transportation effects that parties have identified. I acknowledge that the alteration would have some adverse effects on the safe and efficient operation of Middlefield Drive in the periods before and after school. However, these intervals are relatively short in duration and therefore, these along with the upgrades to the PUDO, on site car parking and potential relocation of pedestrian crossings which are subject to AT approval, collectively these changes will mitigate the effects on the local area whilst providing for sufficient school capacity the area.

Therefore, in conclusion, I consider that the transport effects can be adequately managed and are therefore less than minor.

4.3.5.3 Social and Community Effects

The RA's AEE does not address this specifically but the AEE in section 1.0 states that "it is not proposed to accommodate ... [an ECE] on this site" and this is addressed in general policy terms in the AEE in 6.3 [see section 4.6 below].

I accept the MoE's proposal to remove the ECE from the purpose of the designation. This would not have any impact or effect on the local community or on transport related effects given there is an existing ECE [not related to the school] currently operating on a site abutting the school's northern boundary.

I agree that this proposal will enable further growth of an existing educational facility which in turn, will accommodate growth pressure in the area. Accommodating students in their local area is a positive effect of removing the current roll cap of 540 students. This is a significant change in terms of the alteration to the designation and this is addressed in section 4.4 above.

4.3.6 Effects conclusion

As this is an existing school, I have focussed the assessment of effects on changes enabled by the proposed changes in conditions relating to accommodating more built form on the site and the transport effects associated with enabling a higher school roll.

I consider that subject to the further amendments to the conditions recommended above and discussed in section 4.3.5.2 and Attachment 5, the effects of the project can be avoided, remedied or mitigated.

4.4 National environmental standards

There are no relevant national environmental standards

4.5 National policy statements

Section 171(1)(a)(ii) requires the council to, subject to Part 2, consider the effects on the environment of allowing the notice of requirement, having particular regard to any relevant provisions of a national policy statement.

National Policy Statement Urban Development

The National Policy Statement on Urban Development July 2020 (NPS-UD) sets out the objectives and policies for planning for well-functioning urban environments under the RMA. The NPS-UD came into effect on 20 August 2020.

When assessing a NoR for new, or amendments to designations, regard must be had to the NPS-UD.

In the context of this report, the key objective of the NPS: UD is Objective 1 which requires planning decisions to contribute to well-functioning urban environments.

I consider that the proposed alterations to the NoR are generally consistent with the NPS UD given that it aligns with the relevant residential zone objectives of the AUP [see section 4.9 below]. This in turn enables better provision to an existing educational facility in an area that provides for residential intensification. This then supports the local Flat Bush area, which is part of the essential social infrastructure.

The NPSUD also directs territorial authorities to remove certain provisions from the district plans that have the effect of requiring minimum numbers on car parking. I note that designation conditions are not district plan rules and therefore minimum car parking standards can be continued to be used [either standard or site specific]. This is addressed in more detail in section 4.3.5.2, but the proposal is considered to be consistent with the outcomes envisaged by the NPSUD in providing sufficient development capacity within urban areas.

I can confirm that pick up drop off PUDO spaces can continue to be provided. The consideration and agreement about the design and location of these spaces will therefore not change with the NPSUD.

The TA provided as part of the lodged documents addresses parking in section 5 in relation to the NPS:UD. The review of the parking requirements “are considered to be consistent with the outcomes intended by Policy 11 in the NPSUD.”

Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

The Resource Management (Enabling Housing and Other Matters) Amendment Act 2021 (Enabling Housing Supply Act) amends the RMA by bringing forward and strengthening the NPS-UD. The amendments help to increase housing supply in relevant residential zones within the urban environment.

Medium Density Residential Standards (MDRS)

The statutory requirements of the RMA, relating to the MDRS, are relevant to the underlying zoning of the subject site. The MDRS apply in all relevant residential zones unless there is a qualifying matter. Qualifying matters may make the MDRS and the relevant building height or density requirements under policy 3 (of the NPS-UD) less enabling of development. There are no qualifying matters identified in council’s preliminary response viewer for the NPS:UD and MDRS that affects the subject site. Section 77(g) of the RMA identifies ‘the need to give effect to a designation, or heritage order, but only in relation to the land that is subject to the designation or heritage order’ as a qualifying matter. Therefore, the MoE’s designation will still apply as an existing designation in the AUP as a qualifying matter in accordance with 77(g) of the RMA.

As indicated in section 4.9 below, the land to be designated has an underlying relevant residential zone of Mixed Housing Suburban. At the time of writing this report, the Council has identified the site is proposed to be Mixed Housing Urban – modified under its preliminary response to the NPS UD and MDRS.

Sections 77M(5) and (6) of the RMA⁵ does provide an exemption for Ministry of Education designations if:

- the designation is included in the specified territorial authority's district plan; and
- the designation applies to land that –
 - is in a relevant residential zone; or
 - adjoins a relevant residential zone

then works undertaken under the designation may rely on the provisions of the relevant residential zone that incorporates the density standards of the MDRS if those provisions are more lenient than the conditions of the designation.

MoE have provided this statement [see Attachment 6] in regard to this NoR and NoRs generally:-

“The application of the MDRS will have implications for the MoE’s delivery of education services and facilities across its network in Auckland and other Tier 1 urban environments. While application of the MDRS will not in itself generate growth, it will affect how growth is accommodated and distributed within these environments. How the MoE responds is a wider issue than any particular school site, or area of intensification. It requires a holistic assessment of its network of schools relative to likely future growth and intensification throughout these urban environments.

The MoE is engaged with local authorities in these Tier 1 environments (including Auckland Council) and has commenced work to understand a range of growth scenarios and how it might respond to these over the longer term. There are a range of possibilities, including more intensive school development incorporating larger scale buildings to accommodate a greater number of teaching spaces and other associated facilities. The Enabling Housing Act (RMA s77M) enables the MoE to rely on the MDRS where the school is within or adjoins land subject to the MDRS and the MDRS is more lenient than conditions of relevant designation(s), meaning future school development can interface appropriately with the planned future environment of the surrounding residential area(s). The MoE is still required to follow the Outline Plan process under s176A of the RMA and will need to comply with any standard or specific conditions of designation that are not otherwise displaced by the MDRS.

⁵ 77M Effect of incorporation of MDRS in district plan on new application for resource consents and on some existing designations.

The Ministry does not consider that the MDRS has direct implications for this NoR of requirement. The proposal to remove the roll cap for Willowbank School assists the Ministry to accommodate any additional future roll growth. The additional site-specific conditions proposed to be inserted by this notice of requirement will ensure that any future outline plan process proposing increased teaching spaces is appropriately informed in terms of potential traffic effects by requiring the provision of a Transport Assessment and the review of the School Travel Plan. As a general point, the MoE's position is that intensification of existing schools within intensifying urban environments will be beneficial for the broader transportation network as it will facilitate the use of alternate and active modes of travel within the immediate School catchment."

4.6 Regional Policy Statement (Chapter B of the AUP) (RPS)

The RPS sets the strategic direction for managing the use and development of natural and physical resources throughout Auckland.

RPS provisions are addressed in section 6.3 of the AEE. I agree with this assessment of the objectives

In summary, the proposal is consistent with: -

Chapter B2 promotes a quality compact urban form by focussing residential intensification around centres, transport nodes and major transport corridors. B2.1 (4) is particularly relevant as the proposal supports an existing social facility which is required to support the existing and future development and growth in the area around Flat Bush.

The policy direction for a quality-built environment (Objective B2.3.1(1)) is addressed through the proposed conditions requiring urban design and landscaping considerations at the time of the OPW. Likewise, Policy B2.4.2(10) requires non-residential activities to be of a scale and form that are in keeping with the existing and planned built character of the area. This will be address at the OPW stage.

Objective B2.4.1(5) which refers to non-residential activities being provided in residential areas to support the needs of people and communities, is also met. The existing school site provides educational facilities within an existing residential catchment area with intensification likely in the future. Such facilities are essential to meet the educational and social needs of the people in this existing and new community.

The proposal aligns closely with the outcomes sought in B2.8 Social Facilities. These outcomes include the provision of social facilities that meet the needs of people and communities (Objective B2.8.1(1)), social facilities being located where they are accessible by a range of transport options (Objective B2.8.1(2)), and reverse sensitivity effects between social facilities and neighbouring land uses being avoided, remedied or mitigated (Objective B2.8.1(3)).

Furthermore, Policies B2.8.2(1) refers to social facilities which are accessible to people of all ages and abilities and Policy B2.8.1(2) requires such facilities to meet the diverse demographic and cultural mix of this existing and future emerging community. Policy B2.8.2(3) is particularly relevant as it relates to intensification of, and development of, existing and new sites.

In terms of Chapter B6 – Mana Whenua: Objective B6.3.1(1) seeks that Mana Whenua values, mātauranga and tikanga are properly reflected and accorded sufficient weight in resource management decision-making. I do not consider that there are any issues that are relevant to mana whenua with this proposed alteration to the existing designation and/or changes in conditions given their nature.

Overall, I consider that the proposal is consistent with the relevant RPS provisions.

4.7 Auckland Unitary Plan - Chapter D overlays

The school site is not subject to any overlays.

4.8 Auckland Unitary Plan - Chapter E Auckland-wide

Chapter E provisions considered relevant to the NoR are addressed in section 6.3 of the AEE and are summarised below.

Chapter E27- transport

Chapter E27 contains district level provisions relating to transport. As such, these provisions would be overridden by the designation conditions. A summary of key parts of this section is provided below and are also discussed above in Section 4.3.5.2.

Standards in E27 include 6.2.5 bicycle parking, 7.6.3. design of parking and loading spaces, 6.3.1. size and location of parking spaces, 6.3.3. access and manoeuvring, 6.5. design and location of off-road pedestrian and cycling facilities

As the analyses within the ITA are generally at a high level and the School Master Plan is indicative only [see Appendix B of the lodged documents], the provisions of E27 cannot be fully assessed at this stage. Proposed and as amended [site specific] Condition 1 [on-site car parking], condition 2 [Transport Assessment] and condition 3 [School Travel Plan] all require that the OPW takes into account these matters set out in Chapter E27.

4.9 Auckland Unitary Plan – Chapter H Zones

Chapter H provisions are addressed in section 6.3 of the AEE.

The site is in the Residential – Mixed Housing suburban zone in the AUP. This is typically where schools are located.

Under the Council's preliminary response viewer for the NPSUD and MDRS, this area of Flat Bush around the school, to the north of Gracechurch Drive would be zoned Mixed Housing Urban - modified. The area to the south of Gracechurch Drive is a precinct which is under investigation at the time of writing this report.

This section of the AEE sets out the relevant objectives and policies for this zone. The relevant provisions are briefly described below, however the assessment of the NoR against these provisions are contained elsewhere in this report [including sections 4.3.2 and 4.3.5.1]

I agree with the conclusions in section 6.3 of the AEE that although this zone is “primarily designed to accommodate housing of differing densities, both zones include an objective and policy that seek to provide for non-residential activities that support social, economic and cultural wellbeing of the communities in which they are located.... while being in keeping with the scale and intensity of development anticipated in the zone and avoiding, remedying or mitigating adverse effects on residential amenity” [see H4.2.(4) and H4.3 (9) in the AUP].

I also agree that schools are required to serve enabled [future] growth in the areas in which they are located and given the site size, any potentially adverse effects on the surrounding areas can be suitably mitigated. I note that the MoE has national design guidelines which addresses their interaction with the surrounding environment and public realm.

Therefore, the proposal is considered consistent with the relevant residential zone objectives and policies of the AUP.

4.10 Alternative sites, routes or methods – section 171(1)(b)

This is addressed in section 6.0 and 9.0 of the AEE and in Form 18. In section 9.0, the MoE state that “as the conditions changes relate to providing increased student capacity on an existing school site, no alternative locations have been considered. The main alternative is retaining the status quo. Retaining the roll cap would restrict the student capacity of the school and require students in the local school catchment to travel to other schools. Retaining the standard school designation parking formula would unnecessarily impact on the school footprint to accommodate unnecessary on-site car parks and does not promote travel demand management”.

I agree with this statement.

The use of designations [or alterations to them in this case] is the appropriate tool for providing the ongoing operational certainty for educational facilities, for which the MoE has financial responsibility. This is part of a national strategy for establishing maintaining and operating school site.

4.11 Necessity for work and designation – section 171(1)(c)

The requiring authority has set out its project objectives in Form 18, sections 4.0 and 6.0 of the AEE.

The AEE concludes that “the proposed change to conditions is required to provide opportunities for students to undertake their studies under the Education and Training Act 2020. Accordingly, deleting the roll cap condition along with the addition of new site-specific conditions to assist with mitigating any adverse transport effects is reasonably necessary in achieving the objective of the Minister in providing state schooling for the school catchment area.”

Therefore, I consider that the designation is reasonably necessary to achieve the MoE’s objectives.

4.12 Part 2 of the Resource Management Act 1991

The purpose of the RMA is set out in section 5(1) which is: *to promote the sustainable management of natural and physical resources.*

Sustainable management is defined in section 5(2) as:

...managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

Section 6 of the RMA sets out the matters of national importance which must be recognised and provided for.

Section 7 of the RMA sets out other matters which shall be given regard to.

Section 8 of the RMA requires the principles of the Treaty of Waitangi to be taken into account.

Part 2 of the RMA has been addressed in section 6.1 of the AEE which is summarised below: -

It states “ The proposed conditions’ changes are consistent with the principles of Part 2 of the RMA as they enable the community to provide for their social, cultural and economic well-being by providing necessary community infrastructure to service the projected demand for school education in the area. The site is currently constrained by a condition that limits the ability for the Minister to provide necessary school capacity in the area to meet the demand for school capacity. The actual and potential [adverse] effects of the proposal including transport effects are evaluated and will be able to be avoided, remedied or mitigated”.

In relation to part 7 the AEE considers that the proposed alterations to conditions [and subsequently proposed to be amended] will allow for more efficient use of the existing school to which significant investment has been made over the past 20 years to enable demand for schooling in the area to be met.

The MoE acknowledges in Section 7 of the AEE “that there will be some impact on local residents/road users during pick up and drop off times as is the case with all schools in suburban areas. These effects will be mitigated to the extent practicable”.

I concur with this assessment and consider the proposal to be consistent with sections 5, 6, and 7 of the RMA.

With regard to Section 8, I agree with the assessment in 6.0 that “no Treaty issues have been identified that are relevant to the changes in conditions proposed “. Consultation has not been undertaken with mana whenua by the MoE. The MoE’s position is that no issues have been identified which are specifically relevant to Māori as a result of the proposed changes/alteration to the designation as set out above. Mana whenua were served notice when the NoR was notified and no submissions have been received.

In my view and subject to site specific conditions recommended to be applied to the designation, [see Attachment 5] the NoR meets the purpose of the Act and is consistent with the Part 2 matters.

5 Conclusions

The MoE has lodged a NoR under section 181(2) of the RMA for an alteration to Designation 5007 in the Auckland Unitary Plan (operative in part) (AUP). This alteration would enable the school roll to exceed the current roll cap as set out in the special condition in the existing designation, remove the ECE from the purpose of the designation, and allow for the addition of special site-specific conditions which support this proposal.

That the notice of requirement should be confirmed subject to site specific conditions and with modifications, for the following reasons.

- The notice of requirement and associated works are reasonably necessary for achieving the objectives of the requiring authority.
- Adequate consideration has been given to alternative sites, routes or methods of undertaking the work identified in the notice(s) of requirement.
- The notice of requirement is generally consistent with the relevant AUP provisions.
- The notice of requirement is generally in accordance with Part 2 of the RMA and; and relevant national environmental standards and national policy statements.
- Restrictions, by way of conditions, imposed on the designation can avoid, remedy or mitigate any potential adverse environmental effects.

6 Recommendation and conditions

6.1 Recommendation

Pursuant to section 171(2) of the RMA, it is recommended that the notice of requirement be confirmed, subject to the modified site-specific conditions.

That pursuant to section 171(3) of the RMA the reasons for the recommendation are as follows:

The notice of requirement is consistent with Part 2 of the RMA in that it enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.

The notice of requirement is consistent with and give effect to the relevant national environmental standards, national policy statements and the AUP.

In terms of section 171(1)(b) of the RMA, it is not necessary to consider alternative sites as the MoE as an existing interest in the site which is an existing school site and the proposed change in conditions is not likely to have a significant adverse environmental effects over and above effects of the existing school.

In terms of 171(1)(c) of the RMA, the notice of requirement is reasonably necessary to achieve the requiring authority's objectives.

Restrictions, by way of conditions attached to the notice of requirement have been recommended to avoid, remedy or mitigate adverse environmental effects associated with the works.

6.2 Recommended site-specific conditions

See Attachment 5

ATTACHMENT 1
APPLICATION MATERIAL

FORM 18

NOTICE OF REQUIREMENT BY MINISTER, LOCAL AUTHORITY, OR REQUIRING
AUTHORITY FOR A NEW DESIGNATION OR ALTERATION OF DESIGNATION

Section 181 of the Resource Management Act 1991

To: **Auckland Council**
Private Bag 92300
Victoria Street West
Auckland 1142

The Minister of Education ('the Minister') gives notice of a requirement for an alteration of designation for a public work under s181.

The site to which the requirement applies is as follows:

56 Middlefield Drive, Flatbush, Auckland.

Section 1 Survey Office Plan 69890 (Title ID 871531)

The nature of the proposed public work (or project or work) is:

To enable the school roll to exceed the current roll cap set out in Special Condition 1 of Designation 5007 Willowbank Primary School.

The nature of the proposed restrictions that would apply are:

Alter the purpose and conditions for Designation No. 5007 Willowbank School in the Auckland Unitary Plan as follows (changes shown in ~~strike-out~~ and **replace**):

5007 Willowbank Primary School

Designation Number	5007
Requiring Authority	Minister of Education
Location	56 Middleton Drive, Manukau
Rollover Designation	Yes
Legacy Reference	Designation 275, Auckland Council District Plan (Manukau Section) 2002
Lapse Date	Given effect to (i.e. no lapse date)

Purpose

Educational purposes – primary school (years 0-8) and ~~early childhood education (preschool).~~

Conditions

The standard conditions for all Minister of Education designations apply to this designation, except that where any standard condition conflicts with a site-specific condition below, the site-specific condition shall take precedence.

~~1. The school will have a maximum roll of 540 pupils provided that the roll will be able to exceed 540 pupils up to a maximum of 700 pupils for a period not exceeding three years.~~

1. On-Site Car Parking – School

On-site car parking shall be provided at a rate of 2 car parks for every classroom or classroom equivalent, except where the Council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer and/or transportation planner, that a lesser level is appropriate. Car parking required by this condition shall include parallel car parking spaces in the pick-up and drop off area (PUDO), and any stacked car parks.

2. Transport Assessment

Any outline plan to increase the number of classrooms shall include a Transport Assessment prepared by a suitably qualified traffic engineer/transportation planner, which, taking into account the Transport Assessment prepared by Abley dated 12 November 2021, shall address safety, efficiency and the following specific matters:

- a) the suitability of the design and location of car parking including the management of any stacked parking,
- b) the suitability of the design and location of loading facilities for rubbish trucks, deliveries and other service vehicles.
- c) the pick-up and drop-off area including any onsite changes and management approaches to improve safety.
- d) the access points including measures and treatments to manage conflict between pedestrians, cyclists, scooter users and vehicles
- e) pedestrian and cycle facilities, including the location of the pedestrian crossing on Middlefield Drive and Kea Crossing on Gracechurch Drive.

The Transport Assessment shall be prepared in consultation with Auckland Transport and the outcome of that consultation recorded in the outline plan. Any necessary relocation and upgrading of pedestrian crossings, subject to the approval of Auckland Transport, shall be undertaken at the Requiring Authority's expense.

3. School Travel Plan

Drafting Note (not to be included in the designation): Willowbank School already has a travel plan and is part of the Travelwise programme operated by Auckland Transport.

- a) The Requiring Authority shall either directly or through the School Board of Trustees, continue to have in place a School Travel Plan.

- b) The purpose of the School Travel Plan is to provide specifically for measures to reduce vehicle dependence, including walking school buses, carpooling, the encouragement of the use of public transport, the use of remote pick up/drop off locations if appropriate, and the encouragement of walking and cycling. The Travel Plan shall also address the management of pick up and drop off, and onsite parking. This Travel Plan shall also specifically address the following matters:
 - i. Safe access to the entry points to the school. Features such as Kea Crossings or Zebra Crossings should be specifically considered;
 - ii. Consistency with or use of Auckland Transport's TravelWise programme, or any equivalent programme adopted;
 - iii. Measures to separate vehicle entry and pedestrian/cyclist entries;
 - iv. Location and provision on site of any scooter and cycle parking required;
 - v. Measures to discourage parking over private driveways at adjacent sites in Gracechurch Street and Middlefield Drive;
 - vi. Measures to manage the safe operation of pick up and drop off; and
 - vii. Measures to manage the operation of any stacked parking onsite so that it is used effectively.

- c) The School Travel Plan shall be reviewed and updated as necessary by a suitably qualified and experienced transportation planner at the time of submitting each subsequent Outline Plan of Works relating to increased teaching spaces.

The effects that the public work (or project or work) will have on the environment, and the ways in which any adverse effects will be mitigated are:

The proposal will result in no significant adverse effects. An assessment of effects, including recommended mitigation, is contained in the attached Assessment of Environmental Effects Report and supporting Transport Assessment.

Alternative sites, routes, and methods have been considered to the following extent:

The proposed designation conditions alteration applies to an existing site owned and designated by the Crown for educational purposes. No other sites have been considered.

The use of a designation as a tool for providing for the proposed educational facilities for which the Minister has financial responsibility is the mechanism used widely by the Minister as part of a national strategy for establishing, maintaining and operating school sites. However, some of the current designation conditions are no longer fit for purpose.

Removal of the roll cap and amendment to the standard parking condition is necessary to respond to growth in the area that the Minister must provide for, and to provide for an appropriate on-site supply of car parking taking into account existing site constraints. Further conditions are proposed to ensure an appropriate design of car parking, on-site pick-up and drop-off and pedestrian connections, and the ongoing provision of a school travel plan.

The public work (or project or work) and designation are reasonably necessary for achieving the objectives of the requiring authority because:

The Education and Training Act 2020 empowers the Minister of Education to designate schools. Those elected to the Board of Trustees are legally responsible for the management of their school, in the same manner as applies to all other State schools.

Alteration to the designation conditions is reasonably necessary to enable the school to meet the educational needs of the local community and implement its master plan.

The following resource consents are needed for the proposed activity and have (or have not) been applied for:

No resource consents are required.

The following consultation has been undertaken with parties that are likely to be affected:

A mail out to the local community including a project summary was sent out 6 October 2021 with a feedback date of 21 October 2021. Feedback received and further communications undertaken are detailed in the attached Assessment of Environmental Effects Report.

The Minister of Education attaches the following information required to be included in this notice by the district plan, regional plan, or any regulations made under the Resource Management Act 1991.

Notice of Requirement - Assessment of Environmental Effects Report prepared by Incite dated 12 November 2021 and all appended technical reports and supporting documents.

Signed by

Brian Mitchell (Group Manager National Property Services, Te Puna Hanganga, Matihiko | Infrastructure & Digital)

Te Tāhuhu o te Mātauranga | Ministry of Education

(pursuant to a delegated authority dated November 2021)

Date

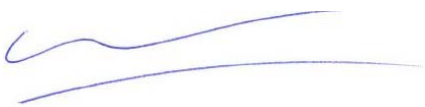

**Notice of Requirement
&
Assessment of Environmental Effects Report
for the Minister of Education
for an Alteration of Designation under s181 of
the RMA**

Willowbank Primary School, 56 Middlefield Drive,
Flatbush, Auckland

January 2022



Quality Control

Title	Notice of Requirement & Assessment of Environmental Effects Report for the Minister of Education for an Alteration of Designation under s181 of the RMA: Willowbank Primary School, 56 Middlefield Drive, Flatbush, Auckland.
Client	Ministry of Education
Version	Final
Date	11 January 2022
File Reference	A40070.00
Prepared by	Chris Horne, Incite
Signature	
Approved by	Emma Howie, Ministry of Education
Signature	

Limitations:

The report has been prepared for the Ministry of Education on behalf of the Minister of Education, according to their instructions, to support a Notice of Requirement to alter a designation under the Resource Management Act 1991. This report has been prepared on the basis of information provided by the Ministry of Education and technical reports provided by various specialist consultants. Incite has not independently verified the provided information and has relied upon it being accurate and sufficient for use by Incite in preparing the report. Incite accepts no responsibility for errors or omissions in the provided information.

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Overview

Requiring authority: The Minister of Education

Territorial authority: Auckland Council

Nature of notice: To enable the school roll to exceed the current roll cap set out in Special Condition 1 of Designation 5007 Willowbank Primary School and associated changes to the designation purpose and addition of special conditions to support this change.

Site address: 56 Middlefield Drive, Flatbush, Auckland.

Legal description: Section 1 Survey Office Plan 69890 (Title ID 871531)

Landowner: Her Majesty the Queen (the Crown)

Auckland Unitary Plan - Operative in Part:

Zones:

- Residential – Mixed Housing Suburban Zone

Precincts:

- Nil

Overlays:

- Nil

Controls:

- Macroinvertebrate Community Index - Urban

Designations:

- ID 5007 Educational Purposes - primary school (years 0-8) and early childhood education (preschool), Minister of Education
- ID 1102 Protection of aeronautical functions – obstacle limitation surfaces, Auckland International Airport Limited

Flood Plains and Overland Flow Paths

- Flood plain and overland flow paths apply to parts of the site

Additional consents: No other consents are being sought as part of this notice of requirement.

1.0 Introduction

The following document supports a Notice of Requirement (Notice) by the Minister of Education (the Minister), under s181 of the Resource Management Act 1991 (RMA) to alter the purpose and conditions of existing Designation 5007 in regard to Willowbank School at 56 Middlefield Drive, Flatbush. It includes an Assessment of Environmental Effects (AEE) Report.

In summary, the existing condition relating to a school student roll cap constrain the ability of the school to respond to growth and serve the schooling needs of the community. As explained later in this document, the roll cap condition was agreed as a pragmatic step to settle an appeal when the designation was originally confirmed in 2000 to enable the school to open in 2001. It is recorded in the Environment Court consent order that the Minister did not consider the condition necessary or appropriate and that the Minister reserved the right to lodge a requirement to alter the designation at the later date to allow the condition to be determined substantively at a hearing without compromising the establishment of the school. The Minister is now seeking removal of this condition to allow the school to respond to demand for schooling in the area. Additionally, the purpose will be altered to remove reference to an Early Childhood Education Centre (ECE) as it is not proposed to accommodate one on this site, and new special conditions in relation to transportation matters to assist with managing the effects of a larger student roll.

Section 171 of the RMA sets out the matters the territorial authority (Auckland Council) shall have regard to in considering this requirement for an alteration of designation and making its recommendation to the requiring authority. This report assesses the proposed designation conditions changes against the relevant parts of s171.

2.0 Site Description

The site is located at 56 Middlefield Drive, Flatbush, Auckland and is owned by the Crown for educational purposes. The extent of the site is shown in Figure 1 below. The site is legally described at Section 1 Survey Office Plan 69890 and is approximately 2.55ha in area.

Willowbank School is a typical primary school comprising:

- Buildings; including classrooms (32 existing teaching spaces), hall, library, gymnasium, specialist teaching areas, administration office space, staff workspace, caretaker's facilities, sick bay, etc;
- Outdoor play area, sports field, hardcourts, playground structures;
- Vehicular, pedestrian and cycle access and egress, parking space for staff, visitors and cycles, onsite student drop off/pick up bays, onsite bus parking;
- Landscaping, and;
- Infrastructure services including water, sewerage, stormwater, telecommunications and outdoor lighting.

An aerial photo showing the location and configuration of the school is shown in Figure 1 below. The site has frontage to Middlefield Drive on its western frontage and Gracechurch Drive on its southern frontage. Vehicle access is via Middlefield Drive with two vehicle crossings serving the car park and pick-up drop-off (PUDO) area. The PUDO area runs parallel to Middlefield Drive with the entrance also serving the car park generally adjacent to the northern site boundary, and the exit further south along the Middlefield Drive frontage. Pedestrian access is available from both Middlefield Drive and Gracechurch Drive.

There is a pedestrian crossing on Middlefield Drive immediately to the north of the northern school access and marked parallel car parks adjoining the school along Gracechurch Drive. The wider area is characterised by suburban residential development with immediately adjoining and opposite sites gently comprising houses with a kindergarten fronting Middlefield Drive immediately adjoining the site to the north.



Figure 1: Willowbank School Site Location and Boundaries

3.0 Background to Conditions

The Minister lodged a notice of requirement for the designation of a new school in early 2000. Following public notification and a Council hearing, a recommendation was made by the then Manukau City Council (later incorporated into Auckland Council) to confirm the decision subject to conditions. The Minister made a decision to confirm the decision subject to conditions on 28 June 2000. This was subsequently appealed to the Environment Court by one of the submitters on the notice of requirement who owned an occupied residential zoned land to the immediate east of the

school at 93 Gracechurch Drive (this land has since been subdivided into several lots, none of which are owned by that appellant).

To enable a quick resolution of the appeal to enable the school to meet a desired opening date of 2001 to meet student demand in the area, the Minister pragmatically agreed to settle the appeal by consent by adding a roll cap condition as follows:

The school will have a maximum roll of 540 pupils provided that the roll will not be able to exceed 540 pupils up to a maximum of 700 pupils for a period not exceeding three years.

It was well signalled in the Environment Court consent order confirming the designation, that the Minister did not agree that this condition was necessary or appropriate and reserved the right to seek deletion of the condition at a later date. In particular the consent order recorded:

- (iii) The parties agree that it is essential for the school to open at the beginning of 2001 in order to relieve pressure on existing educational facilities in the East Tamaki Corridor area of Manukau City in order to promote the ongoing provision of adequate educational facilities for children in that part of Manukau City.
- (iv) In the circumstances the parties have agreed that the designation should be confirmed at this stage subject to a condition imposing a restriction on the maximum roll in the form set out above. The parties understand that the condition is without prejudice to the Minister's view that it is unnecessary and inappropriate and that the Minister reserves the right to lodge with Manukau City Council after the designation has been confirmed a requirement to alter the designation through removal of the condition. That will allow the issue to be determined substantively at a hearing in the future without compromising the establishment of the school.

A copy of the consent order is attached in Appendix D. The roll cap was not part of the Manukau City Council recommendation to confirm the requirement or imposed by the Court.

School infrastructure has been progressively implemented since 2001 via a series of outline plans submitted under the designation. The last outline plan to add classroom space was processed by Manukau City Council in 2008 with the classroom opening in 2009. Council files do not indicate an enquiry into current roll for the last outline plan to add teaching spaces. Concurrently the surrounding residential catchment has grown significantly since 2001.

The school now has a classroom capacity issue to meet demand and has embarked on a master planning exercise to accommodate a roll of 900 students which exceeds the roll cap. In collating information to support the designation alteration it has also become apparent that the existing roll of approximately 800 students already exceeds the roll cap condition. Removal of the roll cap is necessary to regularise the existing roll and to enable growth as envisaged for the master plan. Whilst

removal of this condition was signalled back in 2000 as part of the appeal settlement, it has unfortunately not been followed through with to date and now requires urgent resolution.

Further, as with most designated schools in Auckland which number several hundred, at the time the school designations in the various legacy Council district plans were “rolled over” into the Auckland Unitary Plan following creation of Auckland Council, standard conditions were included in the Auckland Unitary Plan to provide more consistency across school designations. Accordingly, aside from the roll cap special condition, the standard conditions for schools designated in the Auckland Unitary Plan apply (see standard conditions in Appendix E). This includes a standard parking ratio condition for schools as follows:

3. On-Site Car Parking – Schools

Additional on-site car parking shall be provided at the rate of two carparks per new classroom or classroom equivalent, except where the council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer and/or transportation planner, that a lesser level is appropriate. For the avoidance of doubt, this condition shall only apply where there is a net increase in the number of classrooms or classroom equivalents.

In the short term (Stage 1 development) a net increase in 2 new classrooms is proposed to 34 classrooms. The long-term master plan provides for up to 38 classrooms (a net increase of six from existing) to meet future growth. This would require 76 car parks under the current condition. To meet this condition it will likely be necessary to include stacked car parks and use of PUDO spaces without compromising key amenity such as fields and outdoor recreation space. Whilst the designation condition in the Auckland Unitary Plan only applies to new (additional) classrooms, it appears that previous school establishment and subsequent growth has not provided all of the car parks required by the legacy designation condition for this site (Condition 13 of the legacy designation) which required the same car parking ratio of 2 car parks per classroom.

13. That parking areas and driveways be formed, drained, sealed and marked prior to the commencement of use of these parking areas. Parking spaces shall be provided at a rate of no less than two spaces per class room and shall be established prior to the commencement of the activity that they are designed to serve.

A bespoke parking condition for this school is proposed based on what parking can practically be provided as included on the master plan. The master plan currently shows 75 spaces, although this includes parallel parks in the PUDO area and a number of stacked spaces in the staff car park.

A new special condition is proposed to ensure the design of the car parking, PUDO area and pedestrian and cycle facilities including the detailed positioning of the pedestrian crossings on Middlefield Drive and Gracechurch Drive take proper account of the Transport Assessment prepared by Abley to support this notice of requirement and inform the school master plan, and to involve engagement with Auckland Transport, particularly as a relocation of pedestrian crossings will require Auckland Transport approval.

Whilst the school has a travel plan and is a TravelWise school, a new special condition is proposed to ensure this addresses relevant matters to this particular site and is properly reviewed and updated for each outline plan to increase classroom numbers to ensure it remains fit for purpose.

As an ECE is not proposed on this site and would be difficult to accommodate in association with the anticipated roll growth, the part of the designation purpose relating to an ECE will be removed.

4.0 The Minister's Objectives

The Minister is a requiring authority under section 166 of the RMA. The Minister has financial responsibility for state owned and funded schools, so may give the Council a notice of requirement for a designation or alteration of designation for such works.

The Education and Training Act 2020 mandates the Minister of Education to designate schools. Those elected to the Board of Trustees are legally responsible for the management of their school, in the same manner as applies to all other State schools.

The change to conditions is required to provide opportunities for students to undertake their studies as provided for under the Education and Training Act 2020. Accordingly, deleting the roll cap condition along with the addition of new site-specific conditions to assist with mitigating any adverse transport effects is reasonably necessary in achieving the objective of the Minister in providing state schooling for the school catchment area.

5.0 Alteration to Designation 5007 in the Auckland Unitary Plan

Willowbank school is an existing designation in the Auckland Unitary Plan (Designation 5007), as shown in Figure 2 below. No changes to the existing designation boundaries are proposed.

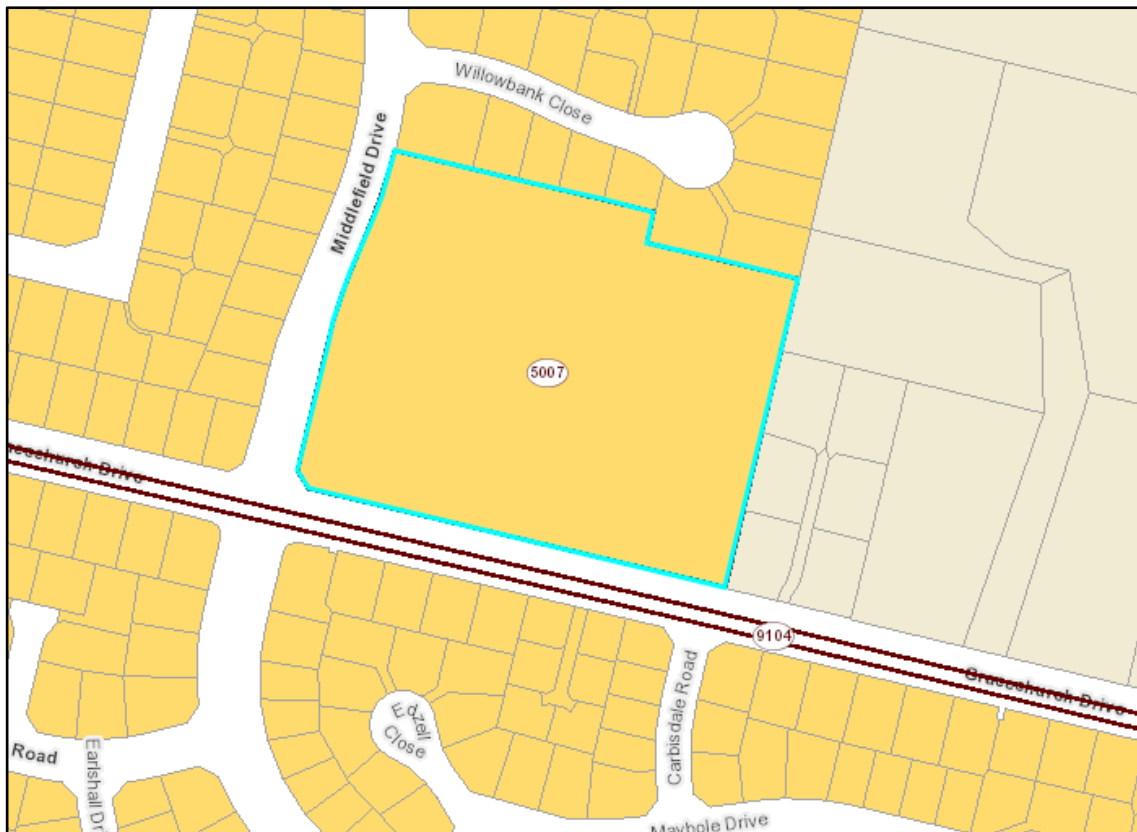


Figure 2: Willowbank School Designation Boundaries

The site is designated for the following purpose:

Educational purposes – primary school (years 0-8) and may include early childhood education (preschool)

The part of the purpose relating to the ECE will be removed to limit the purpose to a primary school.

The following changes to conditions are proposed:

*The standard conditions for all Minister of Education designations apply to this designation, **except that where any standard condition conflicts with a site-specific condition below, the site-specific condition shall take precedence.***

~~1. The school will have a maximum roll of 540 pupils provided that the roll will be able to exceed 540 pupils up to a maximum of 700 pupils for a period not exceeding three years.~~

1. On-Site Car Parking – School

On-site car parking shall be provided at a rate of 2 car parks for every classroom or classroom equivalent, except where the Council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer and/or transportation planner, that a lesser level is appropriate. Car parking required by this condition shall include parallel car parking spaces in the pick-up and drop off area (PUDO), and any stacked car parks.

2. Transport Assessment

Any outline plan to increase the number of classrooms shall include a Transport Assessment prepared by a suitably qualified traffic engineer/transportation planner, which, taking into account the Transport Assessment prepared by Abley dated 12 November 2021, shall address safety, efficiency and the following specific matters:

- a) *the suitability of the design and location of car parking including the management of any stacked parking,*
- b) *the suitability of the design and location of loading facilities for rubbish trucks, deliveries and other service vehicles.*
- c) *the pick-up and drop-off area including any onsite changes and management approaches to improve safety.*
- d) *the access points including measures and treatments to manage conflict between pedestrians, cyclists, scooter users and vehicles*
- e) *pedestrian and cycle facilities, including the location of the pedestrian crossing on Middlefield Drive and Kea Crossing on Gracechurch Drive.*

The Transport Assessment shall be prepared in consultation with Auckland Transport and the outcome of that consultation recorded in the outline plan. Any necessary relocation and upgrading of pedestrian crossings, subject to the approval of Auckland Transport, shall be undertaken at the Requiring Authority's expense.

3. School Travel Plan

- a) *The Requiring Authority shall either directly or through the School Board of Trustees, continue to have in place a School Travel Plan.*
- b) *The purpose of the School Travel Plan is to provide specifically for measures to reduce vehicle dependence, including walking school buses, carpooling, the*

encouragement of the use of public transport, the use of remote pick up/drop off locations if appropriate, and the encouragement of walking and cycling. The Travel Plan shall also address the management of pick up and drop off, and onsite parking. This Travel Plan shall also specifically address the following matters:

- i. Safe access to the entry points to the school. Features such as Kea Crossings or Zebra Crossings should be specifically considered;**
 - ii. Consistency with or use of Auckland Transport's TravelWise programme, or any equivalent programme adopted;**
 - iii. Measures to separate vehicle entry and pedestrian/cyclist entries;**
 - iv. Location and provision on site of any scooter and cycle parking required;**
 - v. Measures to discourage parking over private driveways at adjacent sites in Gracechurch Street and Middlefield Drive;**
 - vi. Measures to manage the safe operation of pick up and drop off; and**
 - vii. Measures to manage the operation of any stacked parking onsite so that it is used effectively.**
- c) The School Travel Plan shall be reviewed and updated as necessary by a suitably qualified and experienced transportation planner at the time of submitting each subsequent Outline Plan of Works relating to increased teaching spaces.**

6.0 Statutory Assessment

The following section provides a statutory assessment of the proposal in accordance with the RMA. The statutory documents assessed include:

- RMA;
- National Policy Statement on Urban Development 2020; and
- Auckland Unitary Plan (operative in part).

6.1 Resource Management Act 1991

The RMA provides for the use and development of New Zealand's natural and physical resources through:

- Part 2, which establishes the purpose and principles applying to resource consents and designations;
- Section 181, which enables a requiring authority to lodge a notice of requirement with the relevant territorial authority to alter a designation; and

- Section 171, which subject to Part 2, prescribes the matters to which particular regard must be had in considering the effects on the environment of allowing the requirement.

The following sections of the RMA are most relevant to this notice.

Section 5 – Purpose

The purpose of the RMA is to promote the sustainable management of natural and physical resources. Sustainable management is defined in section 5(2) as:

... managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The proposed conditions changes are consistent with the principles of Part 2 of the RMA as they enable the community to provide for their social, cultural and economic well-being by providing necessary community infrastructure to service the projected demand for school education in the area. The site is currently constrained by a condition that limits the ability for the Minister to provide necessary school capacity in the area to meet the demand for school capacity. The actual and potential effects of the proposal including transport effects are evaluated later in this report and the supporting Transportation Assessment in Appendix C and will be able to be avoided, remedied or mitigated.

Section 6 – Matters of National Importance

Section 6(e) requires the certain matters of national importance to be recognised and provided for. There are no matters of importance relevant to this alteration of designation proposal.

Section 7 – Other Matters

This section lists certain matters to which particular regard is to be had in making resource management decisions. The relevant matters are as follows:

- (b) The efficient use and development of natural and physical resources;*
- (c) The maintenance and enhancement of amenity values;*
- (f) Maintenance and enhancement of the quality of the environment;*

Removal of the roll cap and changes to special conditions allow for more efficient use of the existing school to which significant investment has been made over the past 20 years to enable demand for schooling in the area to be met. The Transport Assessment in Appendix C confirms that the removal of the roll cap and further expansion of the school which has conservatively assessed the roll at at 1000 students to allow for some growth above the current master plan roll of 900 is acceptable from a transport perspective. It is acknowledged that there will be some impact on local residents/road

users during pick up and drop off times as is the case with all schools in suburban areas. These effects will be mitigated to the extent practicable.

In regard to amenity values and the quality of the environment, the existing standard condition addressing height in relation to boundary from adjacent residential zoned sites will protect those sites from unreasonable dominance and shading for any future additional built form on the school site. As shown on the master plan, it is intended to retain open space areas in the form of fields and other hard and soft recreation spaces which will provide generous open space areas and be available for community recreational use outside of school hours. The existing noise condition will also be retained to protect the aural amenity of the area.

The master plan has sought to avoid any future buildings or parking encroaching into the landscaping buffers adjoining adjacent residential zoned sites.

The height in relation to boundary condition will ensure buildings do not result in unreasonable dominance or shading of adjacent sites. Potential future two-level classroom buildings to replace older classroom stock would be required to comply with the height in relation to boundary condition and would be of a general height anticipated in the current underlying Residential – Mixed Housing Suburban Zone..

Section 8 – Treaty of Waitangi

This section requires those exercising powers or functions under the RMA to take into account the principles of the Treaty of Waitangi. No Treaty issues have been identified that are relevant to the changes in condition proposed.

Section 181 – Notice of Requirement for Alteration of Designation

The Minister of Education is a Minister of the Crown. This notice has been lodged with the relevant territorial authority under section 181(1) of the RMA. The Minister is not seeking to undertake a minor alteration under s181(3).

Section 171 – Recommendation by the Territorial Authority

Under section 171, the territorial authority may recommend to the requiring authority one of the following:

- confirm the requirement
- modify the requirement
- impose conditions
- withdraw the requirement

This recommendation is based on matters the territorial authority is required to have particular regard to when considering a notice of requirement. The matters to be considered are set out in section 171(1) of the RMA and are as follows:

- (1) *When considering a requirement and any submissions received, the territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to—*
- (a) *Any relevant provisions of—*
 - (i) *a national policy statement,*
 - (ii) *a New Zealand coastal policy statement,*
 - (iii) *a regional policy statement, or proposed regional policy statement; and*
 - (iv) *a plan or a proposed plan; and*
 - (b) *Whether adequate consideration has been given to alternative sites, routes, or methods of undertaking work if—*
 - (i) *the requiring authority does not have an interest in the land sufficient for undertaking the work; or*
 - (ii) *it is likely that the work will have significant adverse effect on the environment; and*
 - (c) *Whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*
 - (d) *Any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.*

The proposal to alter the designation conditions applying to this site has taken into account the relevant statutory planning documents as listed above.

The requiring authority has an interest in the land which is used for educational purposes, and the work (change in conditions) is not likely to have significant adverse environmental effects over and above the effects of the existing school. Accordingly, it is not necessary to assess alternative sites, routes or methods.

The proposed changes to the designation conditions to enable additional school student capacity are considered reasonably necessary for the provision of educational services by the Minister. The Minister's objectives are outlined earlier within this report.

No relevant "other matters" in regard to s171(1)(d) have been identified.

Section 176A – Outline Plan

An outline plan of works is required for each stage of future development once the designation changes are confirmed¹, so that the territorial authority is able to understand in detail the nature of proposed physical works, and if necessary, request any changes prior to development. At this stage no detailed design work for site such as building layouts, changes to parking and PUDO arrangements or any changes to landscaping have been undertaken. Future development and outline plans for works will be guided by the Stage 1 development plan and school master plan as included in Appendix B.

¹ Other than as provided for in standard school designation condition 6 which sets out certain minor works that can be undertaken without an outline plan

6.2 National Policy Statement on Urban Development 2020

The proposal is consistent with the National Policy Statement on Urban Development 2020 (NPS-UD). The changes to the conditions will provide critical social infrastructure capacity to support urban development to occur in accordance with the AUP, which supports the outcomes envisaged by NPS-UD.

The NPS-UD also directs territorial authorities to remove certain provisions from district plans that have the effect of requiring minimum numbers on car parking². Whilst the car parking conditions on the designation are not district plan rules, making it clear in the condition that PUDO spaces and stacked parking can be included in the on-site parking requirement of 2 per additional classroom is consistent with the outcomes envisaged by the NPS-UD in providing sufficient development capacity within urban areas, noting that extensive requirements for on-site car parking can constrain the ability to provide for urban growth capacity and disincentivise travel demand management initiatives. Whilst it is appropriate to provide for some level of car parking on the school site to support a well-functioning urban environment, the level of car parking proposed is assessed as being appropriate in this instance. This is supported by the Transport Assessment in Appendix C.

6.3 Auckland Unitary Plan – Operative in Part (AUP)

The AUP fulfils a number of statutory planning functions including a regional policy statement, regional coastal plan, regional plan and district plan to guide development in the Auckland region.

The following provisions of the Regional Policy Statement are of particular relevance to the proposal.

Issues of regional significance

B2.1 Tāhuhu whakaruruhau ā-taone » Urban growth and form

Auckland's growing population increases demand for housing, employment, business, infrastructure, social facilities and services. Growth needs to be provided for in a way that does all of the following:

- (1) enhances the quality of life for individuals and communities;*
- (2) supports integrated planning of land use, infrastructure and development;*
- (3) optimises the efficient use of the existing urban area;*
- (4) encourages the efficient use of existing social facilities and provides for new social facilities;*
- (5) enables provision and use of infrastructure in a way that is efficient, effective and timely;*
- (6) maintains and enhances the quality of the environment, both natural and built;*
- (7) maintains opportunities for rural production; and*
- (8) enables Mana Whenua to participate and their culture and values to be recognised and provided for.*

B2.2.2 Urban Growth and Form Objectives

- 1) A quality compact urban form that enables all of the following:*
 - (a) a higher-quality urban environment;*

² NPS-UD Policy 11(a) and Sub Part 5, 3.38 Car Parking

- (b) greater productivity and economic growth;*
- (c) better use of existing infrastructure and efficient provision of new infrastructure;*
- (d) improved and more effective public transport;*
- (e) greater social and cultural vitality;*
- (f) better maintenance of rural character and rural productivity; and*
- (g) reduced adverse environmental effects.*

B.2.8.1 Social Facilities Objectives

- 1) *Social facilities that meet the needs of people and communities, including enabling them to provide for their social, economic and cultural well-being and their health and safety.*
- 2) *Social facilities located where they are accessible by an appropriate range of transport modes.*
- 3) *Reverse sensitivity effects between social facilities and neighbouring land uses are avoided, remedied or mitigated.*

B.2.8.2 Social Facilities Policies

- 1) *Enable social facilities that are accessible to people of all ages and abilities to establish in appropriate locations as follows:*
 - a) *Small-scale social facilities are located within or close to their local communities*
- 2) *Enable the provision of social facilities to meet the diverse demographic and cultural needs of people and communities.*
- 3) *Enable intensive use and development of existing and new social facility sites.*
- 5) *Enable the efficient and flexible use of social facilities by providing on the same site for:*
 - a) *Activities accessory to the primary function of the site; and*
 - b) *In appropriate locations, co-location of complementary residential and commercial activities.*
- 6) *Manage the transport effects of high trip-generating social facilities in an integrated manner.*

The explanation to the social facilities objectives and policies states that *Social Facilities* include facilities that provide for education. The proposal will enable further growth of an essential education facility to accommodate growth pressure in the area. The proposal specifically promotes Policy B2.8.2 (3) as it enables more intensive use of an existing social facility. Accommodating students in their local area will help manage travel demand by avoiding a need to travel to other schools in the wider area. The facility therefore promotes the social well-being of the community. It also promotes Objective B2.2.2 in regard to urban growth and form by supporting urban intensification and making more efficient use of existing infrastructure.

The site is located in the Residential – Mixed Housing Suburban Zone. Suburban residential areas are typical locations for schools throughout New Zealand. The Mixed Housing Suburban Zone includes a

suite of objectives and policies to enable intensification including multi-unit development whilst maintaining a suburban built character.

The zone policy framework seeks to enable a mix of housing choice compatible with the planned intensity of development for these zones along with consideration of on-site amenity for residents, provision of safe and attractive streets and public open spaces and restrictions on impervious areas to manage stormwater runoff. Whilst the zone is primarily designed to accommodate housing of differing densities, it includes an objective and policy that seeks to provide for non-residential activities that support social, economic and cultural wellbeing of the communities in which they are located while being in keeping with the scale and intensity of development anticipated in the zone and avoiding, remedying or mitigating adverse effects on residential amenity³.

In this instance, providing for further roll growth at this school is required to serve growth enabled by the Auckland Unitary Plan on a large site that enables any adverse effects to be mitigated on the amenity of surrounding residential areas. Modern school buildings include high quality architectural designs to address their interaction with the surrounding environment and public realm, consideration of crime prevention through environmental design (CPTED) principles, promotion of safe and easy access by all modes of transport, and environmental sustainability including water and energy conservation. This is embodied in the Ministry of Education's national design guidelines that are mandatory of school design projects⁴.

Accordingly, the proposal is assessed as being consistent with the relevant residential zone objectives and policies of the AUP.

The Objectives and Policies for Transportation are set out in Chapter E27. Key outcomes promoted include⁵:

- Managing adverse effects on the transport system;
- Parking and loading supports a compact urban form;
- Travel planning is promoted to managed adverse effects on the transport system;
- The number, location and type of parking spaces supports:
 - The safe, efficient and effective operation of the transport network;
 - The use of more sustainable transport options;
 - The functional and operational requirements of activities;
 - The efficient use of land;
 - The recognition that different activities having different trip characteristics; and
 - The efficient use of on-street car parking.
- Provision of a minimum level of on-site car parking in recognition of the more limited alternatives to private vehicle travel for zones such as Residential - Mixed Housing Suburban Zone)

³ See AUP H4.2(4), H4.3(9)

⁴ Designing Schools in New Zealand, Requirements and Guidelines – Ministry of Education, October 2015.

⁵ See AUP E27.2(1), (3), (4) and E27.3 (1), (3) and (8)

In this instance, removal of the roll cap encourages students to travel to a school in their local catchment area rather than travelling to a school at another location. This in combination with travel planning already undertaken at the school as part of the TravelWise Programme that supports travel demand management and a sustainable transport system. The amended on-site parking condition for this designation which clarifies that PUDO spaces and stacked parks can be included in the parking requirement recognises the practical development constraints on this site and provides for an appropriate supply of on-site car parking for this school. The on-site parking supply that would result from the proposed parking formula is supported by the Transport Assessment in Appendix C. The special condition in regard to provision of a transport assessment and engagement with Auckland Transport as part of future outline plans to increase classroom numbers will ensure appropriate design solutions consistent with or achieving equivalent outcomes to the Transport Assessment in Appendix C are implemented. A further condition to more formally require a travel plan is also proposed.

Whilst it is acknowledged that there will continue to be some impacts on the adjacent road network at peak times, the proposed conditions along with upgrades to the PUDO, on-site car parking and location of pedestrian crossings (subject to Auckland Transport approval) are designed to mitigate these to the extent practicable whilst providing for sufficient school capacity in the area. Accordingly, the changes to the conditions of the designation are considered to be consistent with the Transport objectives and policies of Chapter E27.

7.0 Assessment of Environmental Effects

7.1 Overview of Approach

A Transport Assessment prepared by Abley Limited and a master plan for future roll growth prepared by WSP is provided as supporting information for assessment the effects of the change in conditions.

As the school already exists, the assessment of effects focusses on changes enabled by the changes in conditions relating to accommodating more built form on the site, and the transport effects associated with enabling a higher student roll.

7.2 Visual and Amenity Effects

The site is subject to standard conditions that apply to most designated school sites in Auckland relating to height in relation to boundary controls from adjacent residential zoned sites and noise restrictions. Based on the master planning undertaken, it is anticipated that up to a further 6 classrooms could be added the site in the foreseeable future (net increase in classrooms). This may include removal of some older stock and replacement with new stock. Classroom blocks greater than 2-levels are not anticipated. Accordingly, the height of any future additional or replacement classrooms of blocks is expected to remain consistent with the expected height of built form in the

underlying zone (8-9m). Further, the existing height in relation to boundary designation condition will ensure the interface of the site with adjoining residential sites is appropriately managed.

The northern boundary of the site where it adjoins adjacent residential properties is generally well screened with mature vegetation. Vegetation is less dense along the eastern boundary. However the adjacent land sits higher which would reduce the apparent height of any building built on the school towards that part of the site. As discussed in Section 10 below, feedback received from adjacent residents to the east raised issues in regard to possible loss of outlook or overlooking from classrooms into private residential space. There is potential in the long term for existing classroom stock to be replaced with two-level school buildings in the future. These will remain subject to the existing height in relation to boundary control, and the indicative orientation shown in master plan Options 3a and 3b would minimise the profile of the buildings in relation to adjacent residential sites and building ends would not need to include windows to protect privacy of adjacent dwellings. The detailed design and location of any future classrooms including orientation to adjacent residential land can be considered in future outline plans.

Any future outline plans to add buildings to the site can consider whether any further landscaping is appropriate in the circumstances, depending on where new buildings are being constructed.

As shown in the master plan, the visual relief from built form that is provided by the playing fields and other open spaces will be retained.

Aural amenity will be protected by the standard school noise condition which will continue to apply.

7.3 Transport Effects

Removal of the roll cap and a bespoke car parking condition are required to ensure that the school can serve student demand in the area and to ensure the site is efficiently utilised within practical space constraints without unnecessarily over supplying on-site car parking.

The implication of unnecessarily constraining the roll of Willowbank School is that students will have to access schooling outside of their local area which in itself may have adverse effects on the transport system. The roll cap was an artificially imposed constraint on the school not based on any Council or Environment Court recommendation but rather as a pragmatic agreement to settle an appeal to open the school within a short timeframe to serve local student demand.

The school Stage 1 development and master plan has been developed in consultation with Abley to properly consider the future design of on-site car parking, the on-site PUDO and pedestrian connections to the site. Proposed special condition 2 will ensure these matters are appropriately considered in further school development to increase classroom numbers, and that this will be undertaken in consultation with Auckland Transport. Subject to Auckland Transport approval, it would be desirable as part of the next stage of classroom development to move the existing pedestrian crossing further south along Middlefield Drive and the Kea crossing further west along

Gracechurch. This can be undertaken at the requiring authority's cost if agreed by Auckland Transport.

A Transport Assessment prepared by Abley Limited is attached as Appendix C. The Transport Assessment reports on the existing and future transport and parking demands for school staff, visitors and student pick-up and drop off. The conclusions of the assessment are:

- The crash history on the surrounding streets does not indicate a road safety issue in the area.
- The school is well serviced by public transport.
- The future stages of expansion of the school will include 13 PUDO parking spaces.
- There is currently on-street parking capacity at school start and finish times, within a 200m walk to the school. The proposed PUDO spaces and the on-street parking capacity is considered to be sufficient to cater for the master plan school roll of 1000 students.
- The existing staff and visitor car park currently has some capacity. The additional car parking proposed as the school grows is considered appropriate.
- A customised condition of 1.75 car parks per two classrooms is considered appropriate for Willowbank School, including the use of stacked parking; and the PUDO parking spaces utilised by visitors outside school start and finish times.
- The stacked parking arrangement proposed at master plan Build is considered adequate and can be managed through the school office.
- Observation surveys did not raise any safety, operational or driver behaviour issues on the surrounding streets during the busy school pick up / drop off period, although feedback from adjacent residents is that they have issues with parking over private driveways along Gracechurch Drive.
- The intersections on Middlefield Drive were observed to operate at a good level of service.

Overall, the Transport Assessment concludes that removal of the school roll cap and the further expansion of the school roll, which has conservatively considered a roll of 1000 students is considered acceptable from a transport perspective.

As discussed in Section 10 below, adjacent residents to the east on Gracechurch Drive have advised that they currently have issues with people parking across their private driveways during peak pick up and drop off times. Relocation of the pedestrian Kea crossing to link with the path midway along Gracechurch Drive, along with improvements to the PUDO and pedestrian crossing location on Middlefield Drive are designed to provide improvements to the existing situation.

8.0 Additional Consents Required

In general, no further land-use consents will be required from the Auckland Council in terms of its District Council consent functions once the alteration to designation is confirmed. Any potential regional resource consents such as for bulk earthworks cannot be determined until detailed design for any further development of site has been undertaken. However, given the expected nature of

any future site works it is unlikely they would be required. Accordingly, no resource consents from Auckland Council under the Auckland Unitary Plan can be applied for at this stage and will be applied for if necessary in the future when a sufficient level of detail for resource consents is available. It is anticipated that this would occur concurrently with any outline plan submitted to the council under the designation.

9.0 Alternative Locations and Methods

As the conditions changes relate to providing increased student capacity on an existing school site, no alternative locations have been considered. The main alternative is retaining the status quo. Retaining the roll cap would restrict the student capacity of the school and require students in the local school catchment to travel to other schools. Retaining the standard school designation parking formula would unnecessarily impact on the school footprint to accommodate unnecessary on-site car parks and does not promote travel demand management.

Use of designation as a tool for providing for educational facilities for which the Minister has financial responsibility is the mechanism used widely by the Minister as part of a national strategy for establishing, maintaining and operating school sites. This is considered to be a more appropriate mechanism to provide for ongoing operational certainty for the school that seeking incremental resource consents to authorise further works on the site.

10.0 Consultation

A project information mail-out was sent to the rate payer addresses of adjacent properties including those along both sides of Willowbank Close and properties on the opposite side of Middlefield Drive and Gracechurch Drive.

At the time of finalising the notice of requirement, feedback had been received from three adjacent neighbours to the east of the school along Gracechurch Drive. Matters raised included:

- Impacts of future building location, height and outlook/privacy matters:
- Parking behaviour across private driveways along Gracechurch Drive and general traffic and pedestrian safety during pick up and drop off; and
- Any other restrictions proposed once the roll cap is removed.

The Ministry of Education provided further information including the master plan layouts, draft transport assessment and proposed special conditions, and had online calls with two of these parties who accepted an invitation to discuss concerns raised. Further changes were made to the proposed special conditions following these discussions. While it is not practical to remove all impacts from parent and caregiver driving and parking behaviour during pick up and drop off times, changes outlined in the Transport Assessment are designed to mitigate the effects of a larger student roll.

In association with opening a new path midway along the Gracechurch Drive frontage and relocating the existing Kea Crossing to a crossing aligned with this new path (subject to Auckland Transport approval), the project team also investigated with the school if the existing pedestrian path from Gracechurch Drive adjacent to residential properties could be closed. However, the school wishes to retain this path to provide more direct and distributed access points to classrooms.

One resident consulted with had residual concerns following further discussion over the potential effects of two-level classroom blocks on the part of the site near the eastern boundary and whether it would be more appropriate to plan for this on another part of the site. The team responsible for the master plan commented on the reasoning leading to the current master plan layouts as follows:

- The school is very short of green space (the school does not meet the Ministry's preferred minimum requirements)
- Building adjacent to the new proposed car park, would further reduce the green space.
- It is challenging to find a suitable location for a car park to serve future master plan growth and the location shown was the preferred given the existing site layout.
- Replacing relocatable teaching spaces is the most desired option when redevelopment /roll growth happens in the future.
- The master plan shows the buildings proposed in Option 3a/3b would meet the current planning rules (i.e. height in relation to boundary) and therefore should not unreasonably impact on adjacent properties.
- The use of two storey building are preferable when developing schools with limited space, more efficient to build up than out. This could have already occurred under the existing designation for replacing existing classroom stock (up to the roll cap).
- Finally, though this is an approved master plan, further reviews will be undertaken, should school rolls increase to ensure effects on neighbours are reasonable. For example, building orientations and the location of windows can be considered.

The Notice of Requirement was initially lodged with Auckland Council in November 2021. However, following pre notification further information requests from Auckland Council and Auckland Transport in regard to transport matters, the Minister elected to revise the purpose and conditions, assessment of environmental effects and Transport Assessment, and resubmit the documentation rather than address this as supplementary analysis. Appendix D to the Transport Assessment outlines how each matter of further information requested was addressed. Auckland Transport also requested some changes to the proposed conditions. These changes have generally been adopted in the proposed conditions.

The Minister is seeking public notification of the notice of requirement which will provide further opportunity for the community to be involved in the planning process for the proposed changes.

11.0 Conclusion

The requiring authority has assessed the relevant matters as set out in s171(1) of the RMA and concludes that it is appropriate for the alteration of designation conditions to be confirmed. The designation conditions changes will enable the continued delivery of essential community infrastructure to support population growth in the area and will support travel demand management measures by providing for the opportunity for students to attend schooling in their local area.

As the original notice of requirement for the designation was publicly notified and the roll cap condition followed an Environment Court settlement to dispense with an appeal, the Minister requests that this alteration of designation requirement be publicly notified.

Appendix A

Existing Special Designation Conditions

5007 Willowbank School

Designation Number	5007
Requiring Authority	Minister of Education
Location	56 Middlefield Drive, Manukau
Rollover Designation	Yes
Legacy Reference	Designation 275, Auckland Council District Plan (Manukau Section) 2002
Lapse Date	Given effect to (i.e. no lapse date)

Purpose

Educational purposes - primary school (years 0 - 8) and may include early childhood education (preschool).

Conditions

The standard conditions for all Minister of Education designations apply to this designation.

1. The school will have a maximum roll of 540 pupils provided that the roll will be able to exceed 540 pupils up to a maximum of 700 pupils for a period not exceeding three years.

Attachments

No attachments.

Appendix B

School Master Plan

Recommended Option

Stage 1 - Build Roll

STAGE 1 SCOPE:

Relocate 1 x Teaching Space, Extend Admin 30sqm and 2 new Teaching Spaces, 4 new car parks required (2 per additional teaching space)

LEGEND

- NEW BUILDING OTHER
- FENCE - INTERNAL
- FENCE - BOUNDARY
- GATE
- ENTRY
- NEW CAR PARK
- VEGETATION
- TRANSFORMER BOX
- FOOTPATH EDGE SAFETY BARRIER

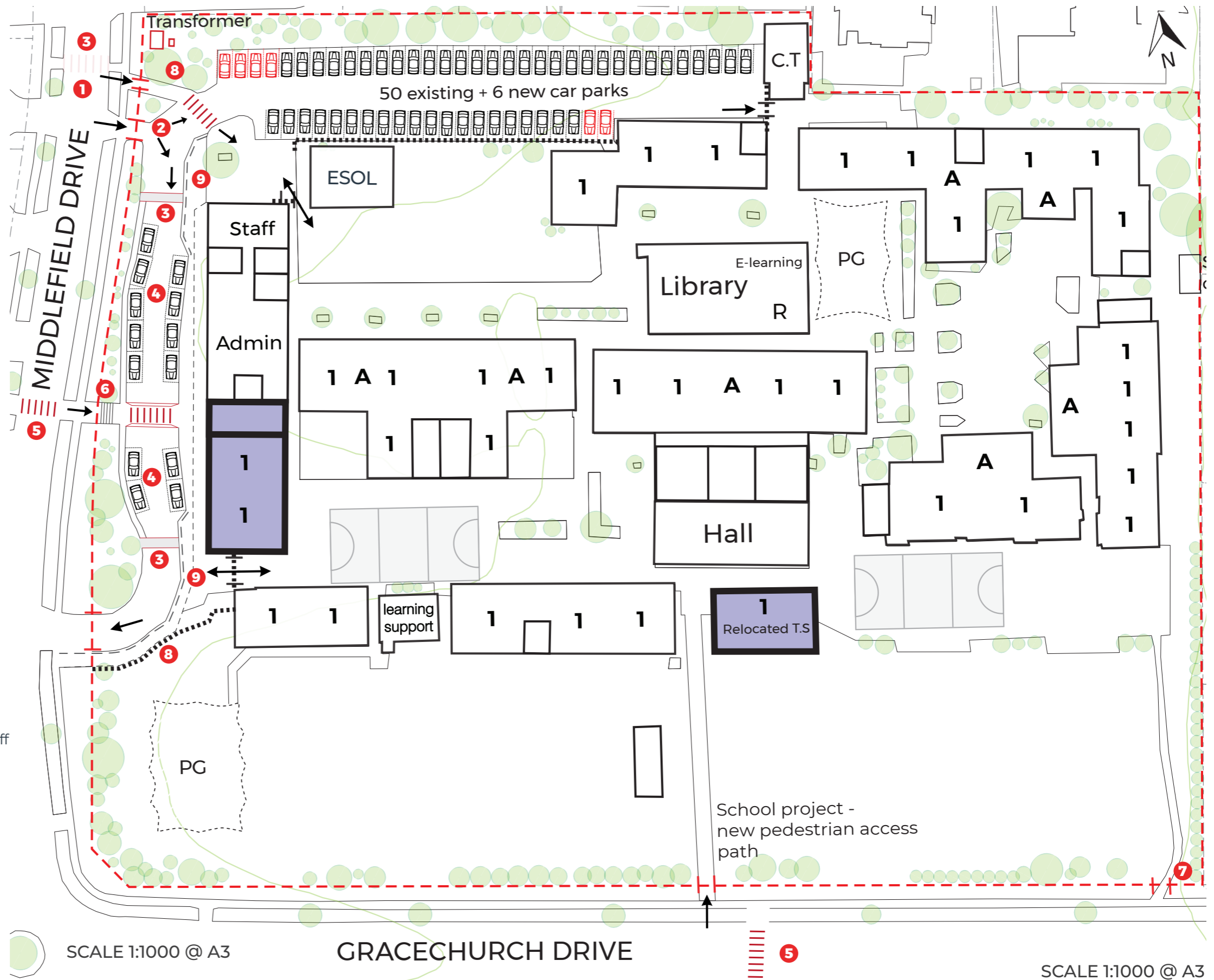
CAR PARKING

- 50 existing car parks
- 6 new spaces in existing car park
- 13 spaces in reconfigured PUDO zone (number of spaces unchanged)

TOTAL: 69 car park spaces

CAR PARK AND PUDO SAFETY MODIFICATIONS

- 1 Remove existing street pedestrian crossing
- 2 Narrow the northern side of the existing main entry
- 3 New raised traffic calming hump
- 4 Reduce PUDO width and adjust carpark / drop-off area markings. carparks 2.5m and carriage way 3.7m width
- 5 Relocated pedestrian crossing
- 6 New steps up to PUDO with raised pedestrian crossing within PUDO
- 7 Existing footpath
- 8 Widen Footpath
- 9 Footpath edge safety barrier



SCALE 1:1000 @ A3

GRACECHURCH DRIVE

SCALE 1:1000 @ A3

Recommended Option

Stage 2 - Masterplan Roll

STAGE 2 SCOPE:
 Build 4 new and 2 replacement Teaching Spaces, 8 new car parks required (2 per additional teaching space) Relocate playground and car park, Replace caretaker shed in new location.

- LEGEND**
- NEW BUILDING OTHER
 - FENCE - INTERNAL
 - FENCE - BOUNDARY
 - GATE
 - ENTRY
 - NEW CAR PARK
 - VEGETATION
 - TRANSFORMER BOX
 - FOOTPATH EDGE SAFETY BARRIER

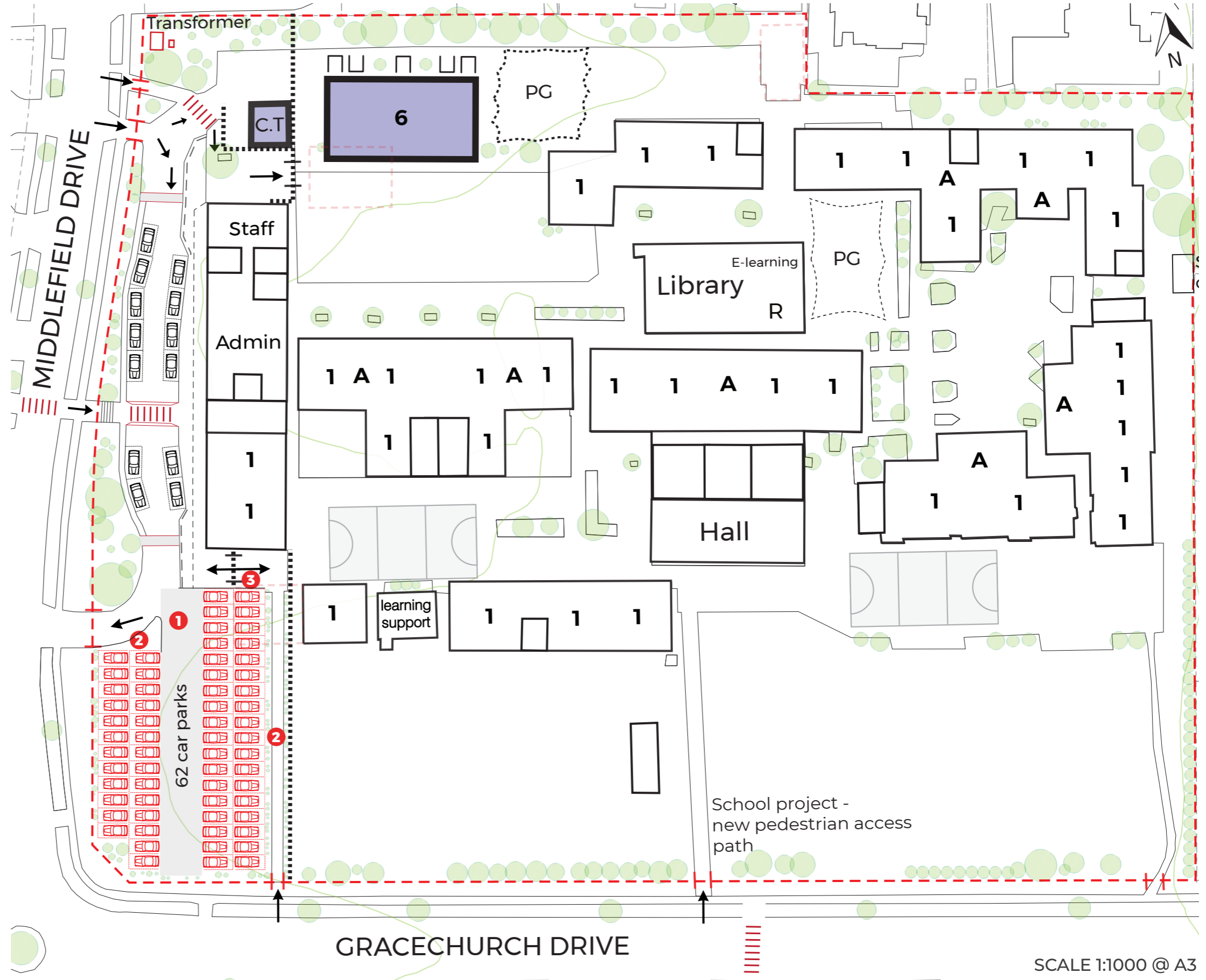
CAR PARKING

- 62 spaces in new car park
- 13 spaces in PUDO zone

TOTAL: 75 car park spaces
(6 car parks added)

CAR PARK AND PUDO SAFETY MODIFICATIONS

- Pudo area as per Stage 1 (no change)
- Stage 2 modifications include:
- 1** Relocating car park and modifying south PUDO end to enter new carpark location.
 - 2** Footpath from south of PUDO moved from Middlefield Drive to Gracechurch Drive
 - 3** Safety Barrier modified and returned around corner adjacent to new carpark



Recommended Option

Stage 3a Masterplan - Hall (area entitlement) and Potential Redevelopment

STAGE 3a SCOPE:

All Teaching Spaces in (blue) are replacement teaching spaces indicating Masterplan redevelopment. Hall is extended.

No requirement to change carparking

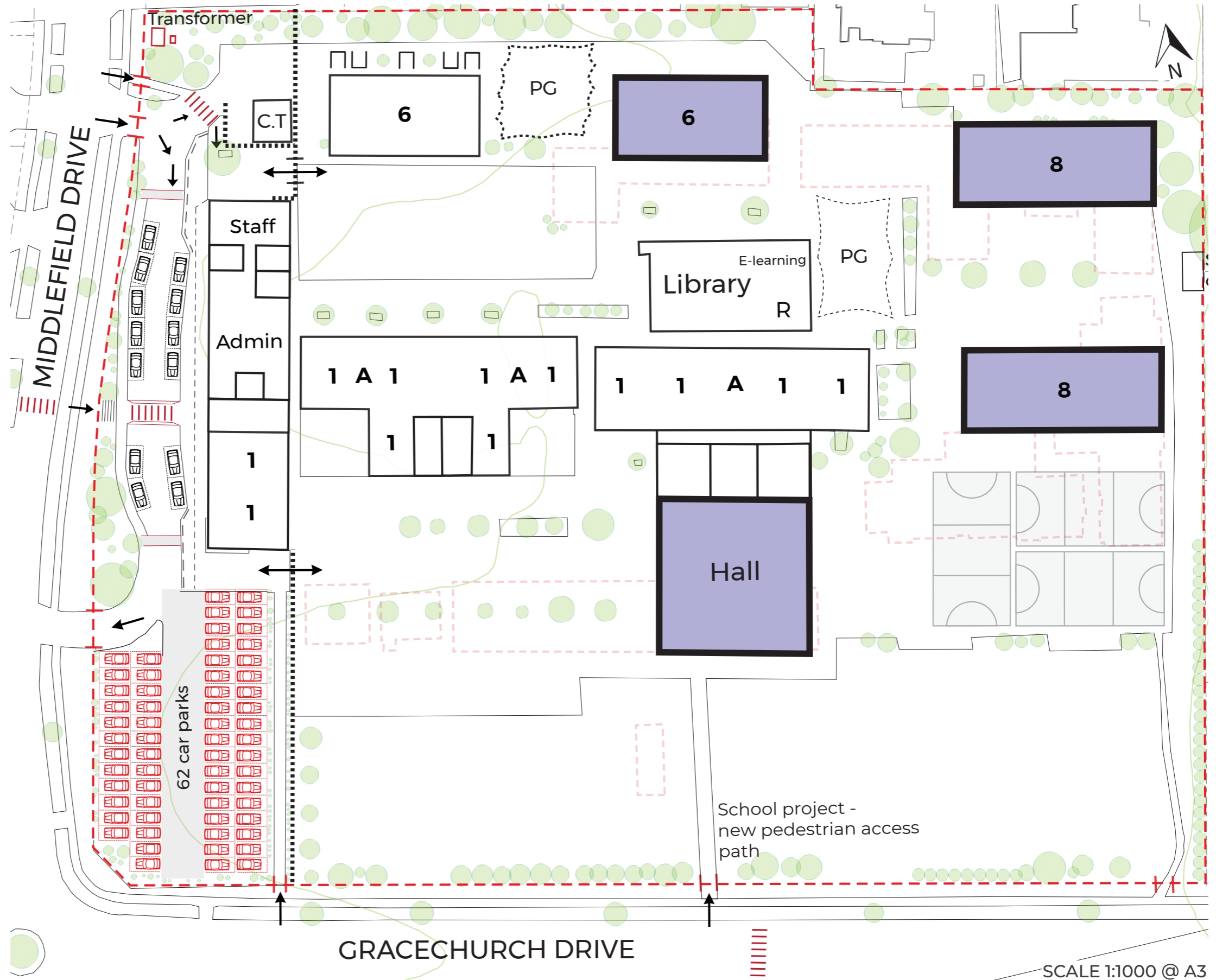
LEGEND

- NEW BUILDING OTHER
- FENCE - INTERNAL
- FENCE - BOUNDARY
- GATE
- ENTRY
- NEW CAR PARK
- VEGETATION
- TRANSFORMER BOX
- FOOTPATH EDGE SAFETY BARRIER

CAR PARKING

- 62 spaces in car park
- 13 spaces in PUDO zone

TOTAL: 75 car park spaces



SCALE 1:1000 @ A3

Recommended Option

Stage 3b Masterplan - Hall (area entitlement) and Potential Redevelopment

STAGE 3b SCOPE:

All Teaching Spaces in (blue) are replacement teaching spaces indicating Masterplan redevelopment. Hall is removed from current location and replaced in new location.

No requirement to change carparking

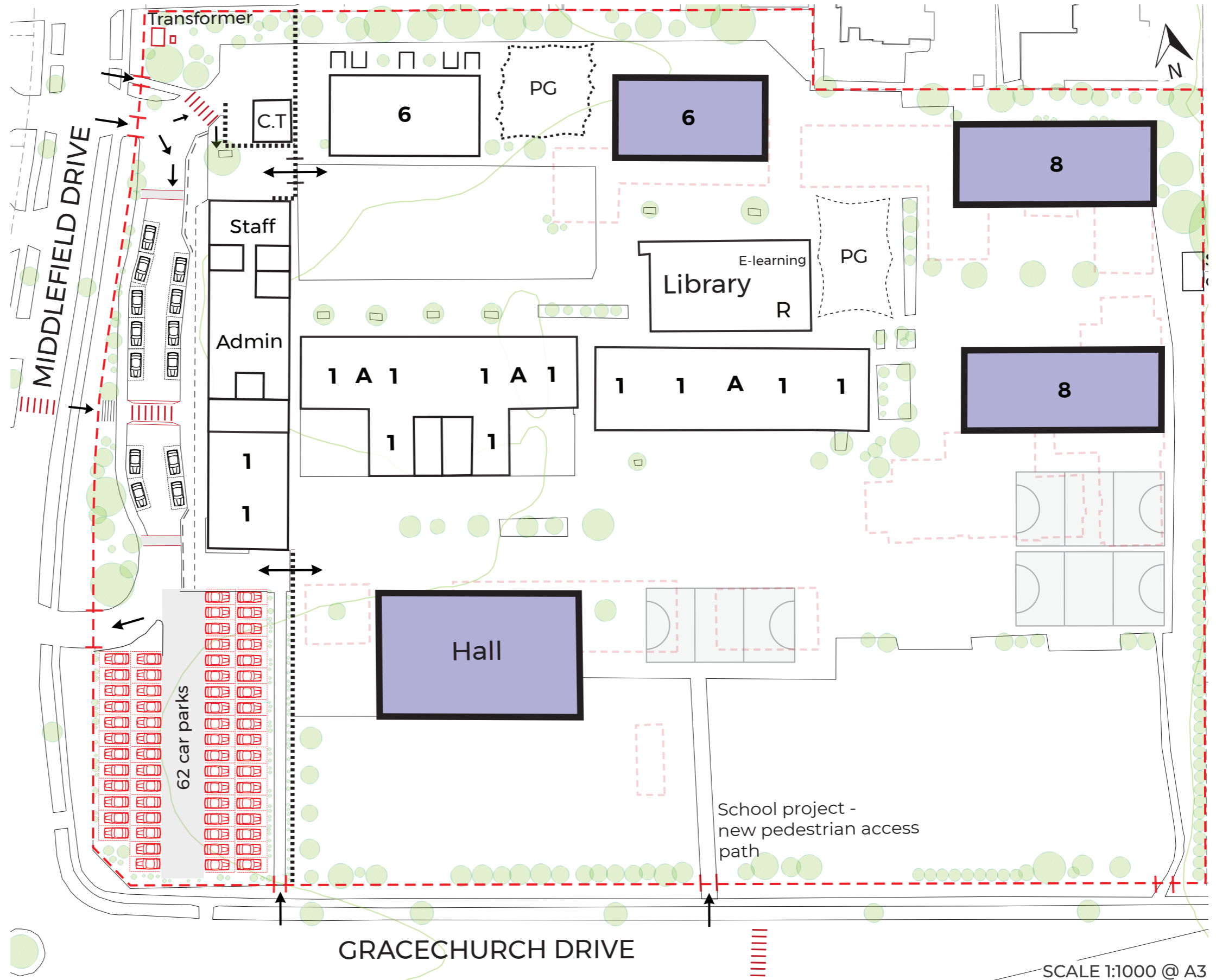
LEGEND

- NEW BUILDING OTHER
- FENCE - INTERNAL
- FENCE - BOUNDARY
- GATE
- ENTRY
- NEW CAR PARK
- VEGETATION
- TRANSFORMER BOX
- FOOTPATH EDGE SAFETY BARRIER

CAR PARKING

- 62 spaces in car park
- 13 spaces in PUDO zone

TOTAL: 75 car park spaces



SCALE 1:1000 @ A3

Appendix C

Transport Assessment

Willowbank School Transport Assessment

Ministry of Education

Willowbank School Transport Assessment

Ministry of Education

Quality Assurance Information

Prepared for: Lee Smith, Emma Howie - Ministry of Education
Job Number: MED-J028
Prepared by: Kate Brill, Principal Transportation Planner
Reviewed by: Shane Ingley, Senior Transportation Engineer

Date issued	Status	Approved by
		Name
8 October 2021	Draft	Kate Brill
21 October 2021	Draft	Kate Brill
12 November 2021	Final	Kate Brill
10 January 2022	Revised with inclusions from AC/AT feedback	Kate Brill

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1. Introduction

Abley has been commissioned by Ministry of Education (MoE) to provide a transport assessment for the full masterplan build of the existing Willowbank School, located at 56 Middlefield Drive in Dannemora.

Willowbank School has a roll cap in the designation conditions to restrict the roll to 540 students, with the ability to expand up to 700 students for a maximum of three years. The school currently has a roll of over 800 students with a masterplan roll of 900 students. However, for the purpose of sensitivity testing and adopting a conservative approach, we have assumed a student roll of 1,000 students for the transport assessment.

The purpose of the Transport Assessment is to understand the transport issues currently facing the school and address the requirements needed to ensure the roll cap can be removed.

The location of the site is shown in **Figure 1.1** below.



Figure 1.1 Site Location

1.1 Consultation and Engagement

Engagement has been undertaken with Auckland Council (AC), Auckland Transport (AT) and the neighbouring properties adjacent to the school. A summary of the engagement with neighbouring properties is provided in Appendix C of this report.

Auckland Council and Auckland Transport requested further information in regard to the initial lodged notice of requirement documentation, as outlined in the table in Appendix D. Abley have revised the Transport Assessment report to incorporate the additional information. A response to the matters raised by AC and AT is provided in Appendix D.

2. Existing site

The existing school has 32 teaching spaces / classrooms. Willowbank School is a primary school catering for Years 0 - 6 with an existing student roll of just over 800 students. The school roll was 809 students when the parking surveys for this report were undertaken. It should be noted that the surveys were undertaken during Alert Level 1 when traffic levels were unlikely to be affected by Covid-19 restrictions.

2.1 Existing car parking

There are 63 parking spaces on the existing site spread across two parking areas, the staff car park at the northern end of the site and the pickup drop off area at the front (western boundary) of the school.

The staff car park, as shown in **Figure 2.1**, has a total of 50 parking spaces including two mobility parks. Entry to the staff car park is via an entry only access on Middlefield Drive, with an exit only onto Middlefield Drive at the southern access. The accesses are restricted to left in, left out only with No Right Turns on both access points at school start and finish times (8.30-9.30am and 2.30-3.30pm).



Figure 2.1 Staff car park

The car park at the front of the school, along the western boundary of the site, shares the same accesses as the staff car park off Middlefield Drive, as shown on **Figure 2.2**. The front car park has a total of 13 parking spaces which consist of 7 pick up/ drop off spaces, 4 staff parks, 1 visitor park and a further space used by the school minivan.



Figure 2.3 Front car park / PUDO area

At the time of writing this report, the school had chosen to close off the front car park to caregivers picking up and dropping off their children. The car park was initially closed off due to 2020 Covid-19 alert levels, however the school chose to not reopen the PUDO area for the following reasons:

- Some drivers would drive at speed through the PUDO car park causing a safety concern

- Reports of aggressive behaviour from drivers
- Limited space for children to wait for pick up resulting in children spilling out into the parking / traffic lanes
- Caregivers arriving late to the school to pick up children, presumably due to the children being safely waiting within the school grounds. This puts extra pressure on teacher resource.
- A queue for the PUDO would sometimes form on Middlefield Drive. Through traffic would overtake on the pedestrian crossing to bypass the queue.

Design measures have been proposed for the PUDO area to help mitigate the current issues. These are discussed later in the report.

2.2 Travel Plan Results / Modal share

The students of Willowbank school currently undertake annual travel surveys as part of the Travelwise programme. Results from the 2020 travel survey were acquired from the school and summarised below. Staff are not included in the travel survey.

Figure 2.4 shows how students travelled to and from school in 2020. Approximately half the students travelled by family car with 52% arriving by car in the mornings and 47% in the afternoons. A further 19% of the students travelled to school by way of Park and Walk (Car/Walk) which is an initiative supported by the Travelwise programme which encourages caregivers to drop their children at a safe location at least 400m away from the school. This initiative reduces the number of cars outside the school gate and encourages walking even for a short distance.

Walking is a popular option at Willowbank with 26% walking to school and a significantly higher 33% walking home in the afternoons. Biking and scootering to school is very low with only one student recorded as biking to school. The number of students scootering to school however may be misrepresented in the survey and may have been counted as pedestrians. This is sometimes dependant on how the teacher asks the question within the classroom.

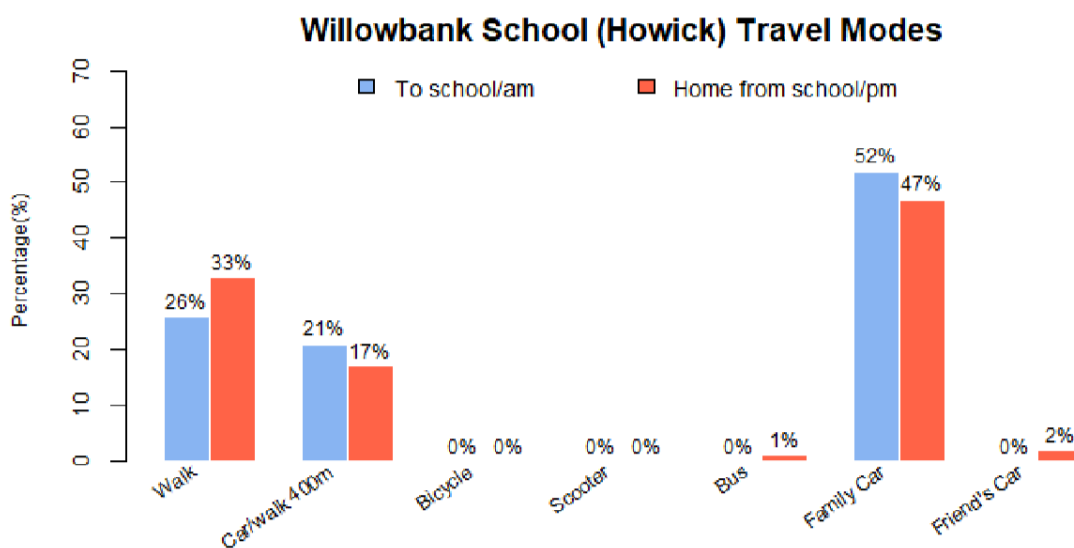


Figure 2.4 Travel Survey Results 2020

Vehicle access

The access points on Middlefield Drive have a width of 6 metres (northern access) and 5.2 metres (southern access). The crossings are relatively wide for one-way traffic flow.

The accesses are restricted to left in, left out movements only. No right turns are permitted into or out of either access point at school start and finish times (8.30-9.30am and 2.30-3.30pm). The introduction of the right turn bans was to prevent queues forming outside the school. The right turn bans are unlikely to present problems as the adjacent roundabouts on either side of the school frontage can facilitate turning movements.

The southern access where vehicles are exiting the school site experiences good sight lines. The Road Traffic Standards Part 6 *Guidelines for visibility at driveways* (RTS 6) requires 40m of sight distance for a high-volume vehicle crossing with frontage onto a road with a speed limit of 50km/hr. Sight distance in excess of 40m is achieved from the southern access, in both directions. Sight lines for the northern access is not a consideration as it is entry only.

2.3 Loading

Delivery and waste collection vehicles currently access the school site via Middlefield Drive, with rubbish collection occurring in the main staff car park. It is understood deliveries utilise the PUDO area where vehicles enter and exit via Middlefield Drive.

The loading arrangement is likely to remain the same for Stage 1 of the school build where the car park arrangement will continue to operate as it does currently. This will be confirmed at Outline Plan of Works (OPW) stage as it is a detailed matter.

The future stages of school expansion (for the Masterplan build) are still to be finalised. Detail such as trucks manoeuvring on-site will be determined at OPW stage. However, it is expected that trucks will be able to manoeuvre on-site to ensure minimal reversing on-site and ability to exit the site in a forward direction.

2.4 Pedestrian access at the school gate

Pedestrians and cyclists access the school at three access points, indicated by yellow arrows in **Figure 2.5**. The two on-street pedestrian crossings are circled in white. The pedestrian access points are described in more detail below:

Northern pedestrian access on Middlefield Drive

The pedestrian access at the north-west boundary of the site is off Middlefield Drive. There is a gate approximately 2m wide with the path widening further onsite to approximately 3m wide. There is a pedestrian zebra crossing on Middlefield Drive leading into this access, with a further crossing on-site to provide a safe crossing point across the vehicle lane into the staff car park.

Surveys showed high volumes of students use this access in both the mornings and afternoons, crossing at the patrolled zebra crossing on Middlefield Drive.

Southern pedestrian access on Middlefield Drive

The pedestrian access at the southern boundary of the site on Middlefield Drive is approximately 1.5m wide. There is a level difference between the footpath and the vehicle lane which provides some protection for pedestrians, however the internal path exits onto the vehicle crossing with no separation between pedestrians and vehicles. Very few students use this access.

Gracechurch Drive pedestrian access

There is an existing pedestrian path at the eastern boundary of the site, off Gracechurch Drive, which is positioned directly adjacent to the Kea Crossing on Gracechurch Drive which is patrolled in the mornings and afternoons. The path is approximately 1.3m wide and has steps at the northern end of the path leading down towards the school. A high volume of school students use this path in the mornings and afternoons.



Figure 2.5 Pedestrian access

2.5 Cycle Parking

There are currently approximately ten cycle stands at the school, with ample room to extend the cycle racks when demand grows.

The travel survey results indicate that there is a low uptake in cycling to school, with only one student recorded as cycling. It is understood that the school does not encourage students from Years 0-5 to cycle unless they are accompanied by an adult. The low cycle modal share should be taken into consideration when assessing requirement for future cycle racks.

2.6 Pedestrian/Cycle infrastructure on surrounding road network

The school zone extends approximately 1.5km north to south, and approximately 3km from west to east, as shown in **Figure 2.6**. There are two main arterial roads running north to south through the school zone, namely Chapel Road and Te Irirangi Road. Both of the arterial roads have safe crossing points for children residing in the eastern side of the school zone. Te Irirangi Road has a signalised pedestrian crossing at the northern end of the zone and a pedestrian overbridge at the southern end. Chapel Road also has signalised pedestrian crossing points at the northern and southern end of the zone.

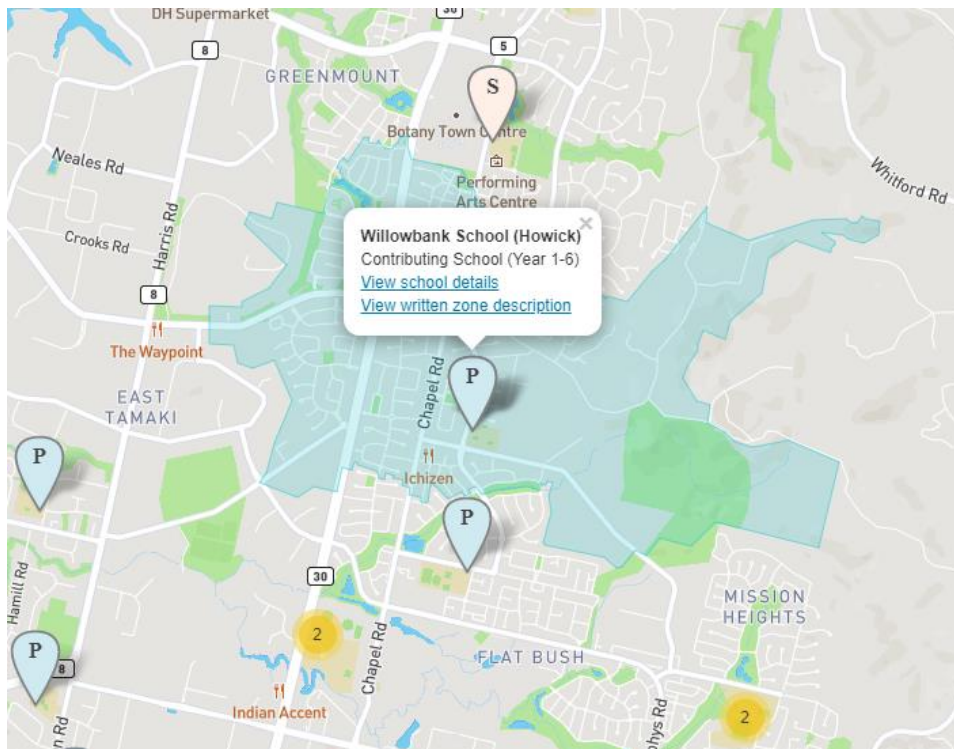


Figure 2.6 Willowbank School Zone

There are footpaths on the majority of the roads within the school zone, allowing for students to walk or scooter from all areas of the zone. The school frontage roads have safe crossing points with a zebra pedestrian crossing on Middlefield Drive and a Kea Crossing on Gracechurch Drive, both of which are patrolled at school start and finish times. The Middlefield Drive / Gracechurch Drive roundabout has pedestrian refuges in the traffic islands on all four legs, however crossing at the roundabout should not be necessary where the majority of the students can cross at the school patrolled crossing points.

On-road cycle lanes are provided on Chapel Road, however these are unprotected and not considered appropriate for school aged children. There are no cycle facilities on the local roads surrounding the school as they are generally low speed environments with low traffic volumes.

In summary, the infrastructure on the surrounding road network caters for students walking and scootering to school, with footpaths on both sides of the road and safe crossing points. There are no cycle facilities in the area, however cycling at primary schools (years 0-6) is generally not encouraged. The low rate of cycling at Willowbank School is not expected to be a result of the lack of cycle infrastructure, more likely due to cycling not an encouraged mode of transport for primary aged children.

2.7 Public Transport

The school site is well serviced by public transport. Chapel Road has frequent bus services that link Botany Bus Station with Manukau Transport Interchange, with bus stops around 300 metres from the school. There is also a bus route which passes the school (route 355) which travels between Botany and Manukau transport interchanges as seen in **Figure 2.7**.



Figure 2.7 Public Transport Routes in vicinity to the school

2.8 Crash History

To understand the existing safety performance of the road network in the vicinity of the school, crashes that were recorded within the last five years (2016 – 2020 inclusive) were obtained through the Waka Kotahi Crash Analysis System (CAS) database. The extent of the crash search area is shown in **Figure 2.8**. A total of eight crashes were recorded, of which four crashes resulted in no injuries, three crashes resulted in minor injuries, and one crash resulted in a serious injury.

Four crashes occurred at the Gracechurch / Middlefield Drive roundabout with the cause of all four related to vehicles failing to give way to oncoming traffic. Two crashes involved adult cyclists, one a motorcycle and the remaining crash was between two vehicles.

The remaining four crashes each involved a vehicle travelling too far left and hitting a parked vehicle, with two occurrences on Gracechurch Drive and two on Middlefield Drive. The only crash that occurred during school hours on a weekday was at 3.15pm where a northbound vehicle hit a parked car outside the school frontage. The accident is not considered to be related to the school as other crashes of a similar nature are recorded outside of school hours.

The crash history is relatively low and typical of the local road network in Auckland. The CAS report is provided in Appendix B.

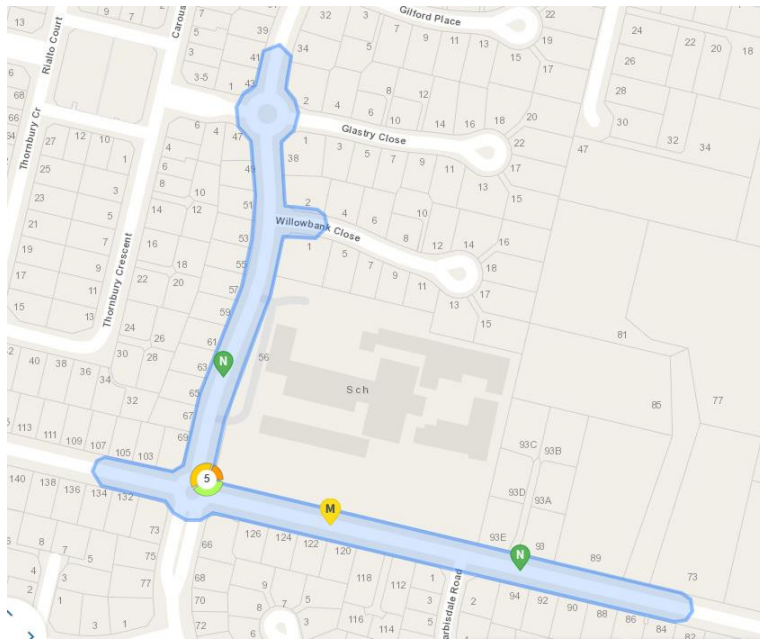


Figure 2.8 Crash Search Area

3. Drone Surveys

Video footage using a drone was used to collect parking, traffic and observational data on the streets surrounding the school, during school start and finish times. The following datasets were collected:

- Parking demand and capacity (on-site and on-street)
- Pedestrian demand at access points; and
- Capacity at nearby intersections;

3.1 Parking Surveys

On Tuesday 8 December 2020, video footage using a drone was undertaken to collect parking data on the surrounding streets of Willowbank School, during school start and finish times. The weather on the survey day was fine and dry.

Footage was taken at the times given below to capture school traffic at school start and finish times; with additional footage taken outside of the peak times for comparative purposes. The school bell for Willowbank School rings at 8.50am in the mornings and 3pm in the afternoons. Students are recommended to arrive between 8.30-8.45am for the 8.50 bell.

Video survey times:

Morning: 8:30 – 8:50am, then again at 9.15am for a comparative dataset.

Afternoon: 2:55 – 3:15pm, then again at 3.30pm for a comparative dataset.

3.2 Extent of School Parking (On-street)

Video surveys were taken during the peak school start and finish times, and then again outside of the peak times. The two datasets were analysed to understand which parking areas on the surrounding streets were affected by school traffic. The results differed for the morning and afternoon peaks.

The on-site Pick up Drop off (PUDO) zone was not open at time of the surveys, with all pick up and drop off of students occurring on-street. All on-street parking in vicinity of the school is unrestricted.

In the mornings, school traffic primarily relied on the on-street parking on Gracechurch Drive and Middlefield Drive with some spilling over onto the cul-de-sacs closest to the school, as seen in **Figure 3.1**. The parking zones are labelled A – E which correspond to the parking zones provided in the survey results in Appendix A.

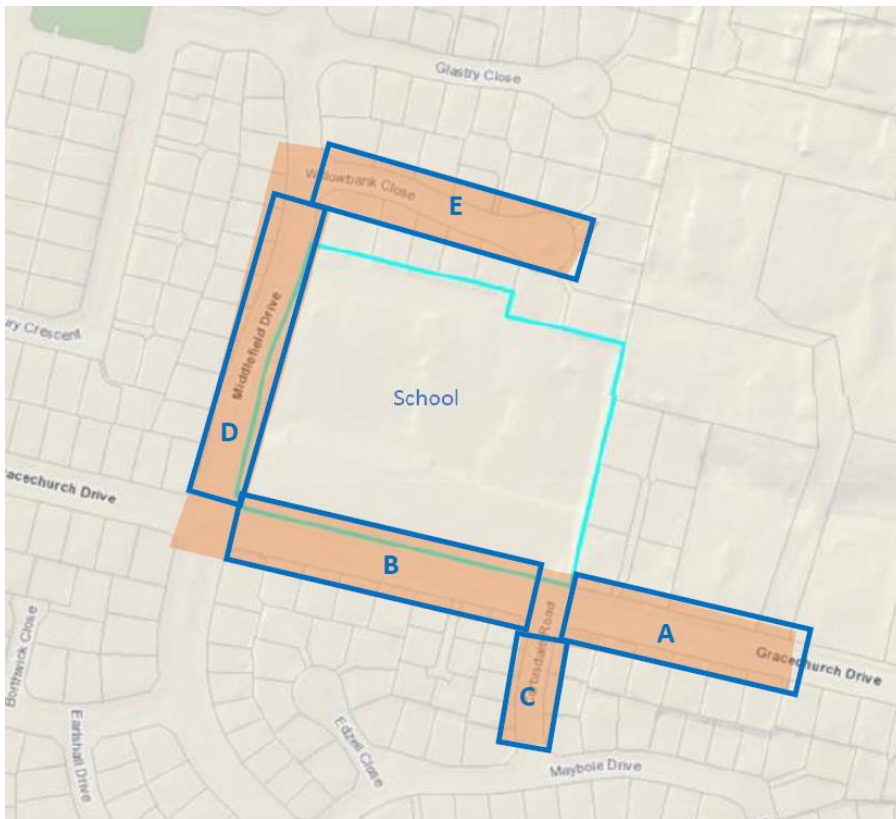


Figure 3.1 Extent of school traffic parking in mornings

The extent of the parking used by school traffic extends slightly further in the afternoons, as seen in **Figure 3.2**. The area extends to the Gracechurch Drive, west of Middlefield Drive, further north on Middlefield Drive and includes several cul-de-sacs. The parking zones are labelled A – J which correspond to the parking zones provided in the survey results in Appendix A.



Figure 3.2 Extent of school traffic parking in afternoons

3.3 On-street Parking Occupancy

The extent of school parking in proximity to the school is limited to the local streets surrounding the school. The most highly utilised area is the 13 marked car parks on the northern side of Gracechurch Drive, along the school frontage. This effectively operates as a dedicated pick up and drop off zone for the school, with a safe route directly into the school with no need to cross any roads. The parking at this location appears to only be used by school traffic.

Parking Occupancy at school start time (Mornings)

Parking occupancy surveys were taken from 8.30am – 8.50am, with school starting at 8.50am. Students are encouraged to arrive to school from 8.30am.

On-street parking occupancy in the school morning peak averaged below 65% for the extent of the drop off period, as shown in Figure 3.3. Drop off occurred relatively consistently between 8.30 – 8.50am, with a busier period between 8.30-8.40am averaging between 52-63% occupancy.

For the purposes of comparison, parking occupancy was surveyed again at 9.15am on the same day, after school drop off had finished. During this time, the parking occupancy on the same streets represented during school peak averaged 29% parking occupancy. This is expected as school demand eases off.

Observation surveys indicated very few or no vehicles parking on no stopping lines or blocking driveways in the morning peak. There reflects the capacity available in the morning peak.

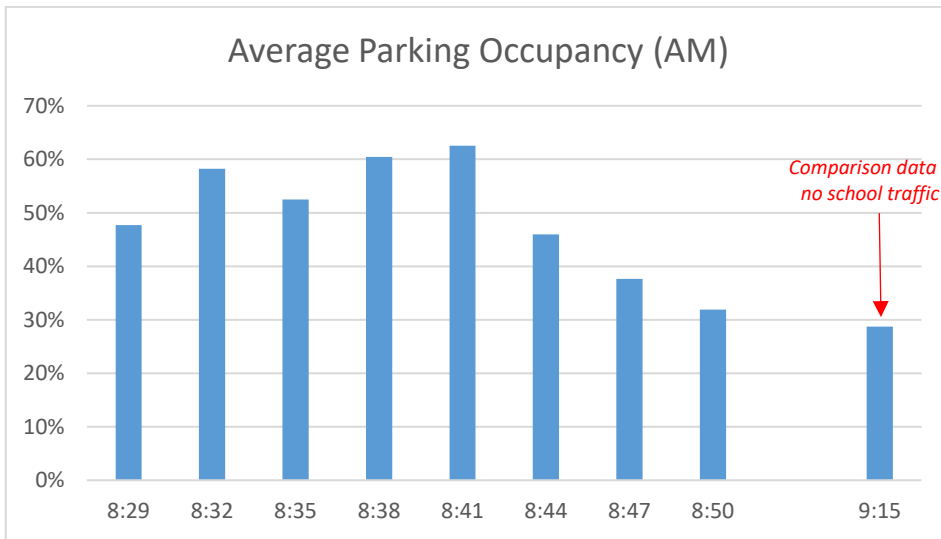


Figure 3.3 AM On-street Parking Occupancy

Parking Occupancy at school finish time (Afternoons)

Parking occupancy surveys were taken from 2.55pm – 3.15pm, with the school bell ringing at 3.00pm for all students.

Parking occupancy within 200 metres of the school in the afternoon peak averaged between 70-80% in the peak of the drop off period, as shown in **Figure 3.4**. The demand tapered off to under 50% occupancy around 7-10 minutes after the bell rang. Parking along the school frontage on both Gracechurch Drive and Middlefield Drive experienced 100% occupancy prior to the school bell at 3:00. However, there was capacity at the peak time slightly further afield on Middlefield Drive and Gracechurch Drive and on the surrounding cul-de-sacs, still within 200m of the school.

For the purposes of comparison, parking occupancy was surveyed again at 3.30pm on the same day, after school pick up had finished, with an average parking occupancy of 18%. This is expected as school demand eases off.

Observation surveys indicated a very small number of vehicles stopping on no stopping lines outside the school, mainly on Gracechurch Drive. When this occurred, it was a minor infringement with one or two vehicles on either end of the marked parking spaces. No safety concerns were observed.

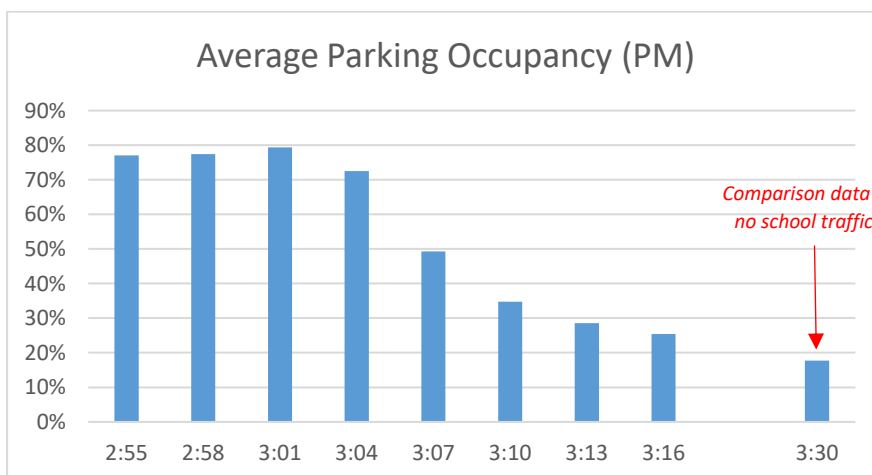


Figure 3.4 PM On-street Parking Occupancy

As expected, the survey results indicate that parking demand is relatively high in the afternoons, directly before the bell rings for the finish of school. However, there is just over 20% capacity, at the peak time, on the surrounding streets within 200m walk to the school.

3.4 Staff and Visitor Car Park Occupancy

The existing number of car parks provided for staff and visitors at the school is 63 parking spaces, 50 spaces in the main car park and 13 spaces in the PUDO area. As noted earlier, the PUDO was closed to pick up and drop off and had signage at the gate to this effect.

Current use of the staff / visitor car park at Willowbank School was surveyed in the morning and afternoon on Tuesday 8 December 2020. The parking occupancy is provided in **Table 3.4**.

Time	Number of car parks available	Parking Occupancy (%)
Morning (school start time)	7 car parks available out of a total of 63 car parks (50 in main car park and 13 in PUDO area)	89% full
Afternoon (school finish time)	18 car parks available out of a total of 63 car parks (50 in main car park and 13 in PUDO area)	71% full

Table 3.4: Parking occupancy for staff / visitor car park

The parking demand of the staff / visitor car park averaged at 80% occupancy, with 89% occupancy (7 car parks available) at its peak at school start time.

3.5 Intersection Performance

The key intersections affected by school traffic are the two roundabouts on Middlefield Drive, namely Middlefield Drive / Gracechurch Drive and Middlefield Drive / Glastry Close intersections.

The travel surveys results indicate that 52% travel by family car in the mornings and 47% in the afternoons. The school roll at time of the parking surveys undertaken for this report was 809 students. This equates to 300 vehicles in the mornings and 272 vehicles in the afternoons (assuming an average student occupancy of 1.4 students per car). For a student roll of 1,000 this would equate to 371 vehicles in the mornings and 336 in the afternoons. Therefore, the *additional* number of vehicles estimated to drive to school at the masterplan roll of 1,000 students will be 71 vehicles (142 trips) in the mornings and 64 (128 trips) in the afternoons. Not all of these vehicles will drive through the roundabouts on Middlefield Drive.

A survey of queue lengths was taken from the drone footage for the two roundabouts, with results provided below.

Middlefield Drive / Gracechurch Drive Intersection

The majority of school traffic travels via the Middlefield Drive / Gracechurch Drive roundabout. Queue length surveys and observations from the drone footage indicate that the roundabout operates at a good level of service in both the mornings and afternoons. **Table 3.5** shows the average and the longest queue length for each of the approaches to the roundabout, in the morning and afternoon school peaks.

Table 3.5 Average and longest queue lengths (number of vehicles) at Middlefield Drive / Gracechurch Drive intersection

Approach	Middlefield Dr South	Middlefield Dr North	Gracechurch Dr West	Gracechurch Dr East
<i>Morning</i>				
Average queue length (no. of vehicles)	2.6	0.3	1.2	0.5
Longest queue length (no. of vehicles)	6	5	4	3
<i>Afternoon</i>				
Average queue length (no. of vehicles)	1.2	0.2	1.0	1.2
Longest queue length (no. of vehicles)	6	2	5	6

The highest average queue length occurs on the Middlefield Drive south approach, with an average queue of 2.6 vehicles in the morning peak. The average queue on all other approaches range between 0.2 – 1.2 vehicles, over both time periods. The longest queue length recorded 6 vehicles which occurred on the Middlefield Drive south approach in the mornings and on the Gracechurch Drive east approach in the afternoon peak.

The intersection is generally busier in the morning peak with maximum queues building up to 6 vehicles, which clear with minimal delay. This is often due to a queue of vehicles delayed by the pedestrian crossing on Middlefield Drive. The pedestrian crossing is patrolled by the school, so queues clear quickly which in turn clear the roundabout quickly with minimal delays. Although vehicles may move through the intersection at a slower pace in the mornings, there is no operational issues with very little delay. Additional traffic that may be generated by an increase in the school roll can comfortably be accommodated on the road network.

As mentioned above, the queues travelling northbound on Middlefield Drive are primarily a result of school children crossing the pedestrian crossing on Middlefield Drive. Relocating the crossing approximately 55m closer to the Middlefield Drive / Gracechurch Drive roundabout is likely to increase the frequency of vehicles queueing back across the roundabout, due to the reduction in stacking space on Middlefield Drive, south of the crossing. The relocated crossing will still allow for approximately 80m of stacking space for vehicles on Middlefield Drive, on the northern approach to the pedestrian crossing. If traffic does queue back through the roundabout, the delays are minimal as the traffic queue dissipates very quickly once the pedestrian crossing is clear. The crossing is patrolled by school staff, therefore allowing the ability to manage traffic queues and minimise delays to traffic. The transport effects of relocating the pedestrian crossing approximately 55m south are considered acceptable and provides a safer outcome to the existing location of the crossing.

Middlefield Drive / Glastry Close Intersection

Table 3.6 shows the average and the longest queue length for each of the approaches to the roundabout, in the morning and afternoon school peaks.

The highest average queue length occurs on the Rialto Close approach, with an average queue of 0.7 vehicles in the afternoon peak. The average queue on all other approaches range between 0 – 0.3 vehicles, over both time periods. The

longest queue length recorded 3 vehicles which occurred on the Middlefield Drive south and Rialto Close approaches in the afternoon peak.

As can be seen from the queue length surveys, the Middlefield Drive / Glastry Close intersection operates very well with next to no delay or queues in both the mornings and afternoons. Additional traffic that may be generated by an increase in the school roll can easily be accommodated on the road network.

Table 3.6 Average and longest queue lengths (number of vehicles) at Middlefield Drive / Glastry Close intersection

Approach	Middlefield Dr South	Middlefield Dr North	Rialto Court	Glastry Close
<i>Morning</i>				
Average queue length (no. of vehicles)	0	0	0.2	0.1
Longest queue length (no. of vehicles)	0	0	2	1
<i>Afternoon</i>				
Average queue length (no. of vehicles)	0.3	0.1	0.7	0
Longest queue length (no. of vehicles)	3	1	3	0

3.6 Pedestrian access points

Observation surveys show that there is roughly equal distribution of students using the northern pedestrian access on Middlefield Drive and the eastern pedestrian access on Gracechurch Drive. The southern pedestrian access on Middlefield Drive (alongside the exit of the PUDO area) has minimal usage.

4. Proposal

Willowbank School will be expanded in the future over two stages, the 'Stage 1 Build' and the 'Masterplan Build'. These stages are detailed below:

Stage 1 Build – this stage will include the addition of two classrooms, with a total of 34 classrooms, and a school roll of 850 students. This stage proposes 69 parking spaces (including PUDO parking).

Masterplan Build – this stage will include the addition of another four classrooms, with a total of 38 classrooms, and a school roll of 900 students (with a sensitivity test of 1000 students). This stage proposes 75 parking spaces (including PUDO parking). The majority of the staff car parks will be stacked in a tandem arrangement, as discussed later in the report.

4.1 Car Parking Supply

Stage 1 Build

Stage 1 of the expansion will include a total of 69 parking spaces, including 56 staff car parks and 13 PUDO / visitor car parks. The parking layout is shown in **Figure 4.1** below. Visitors that arrive during school hours (outside of school start and finish times) can utilise the student PUDO area. Utilising the PUDO area for different users, at different times of the day, results in a more efficient use of land.

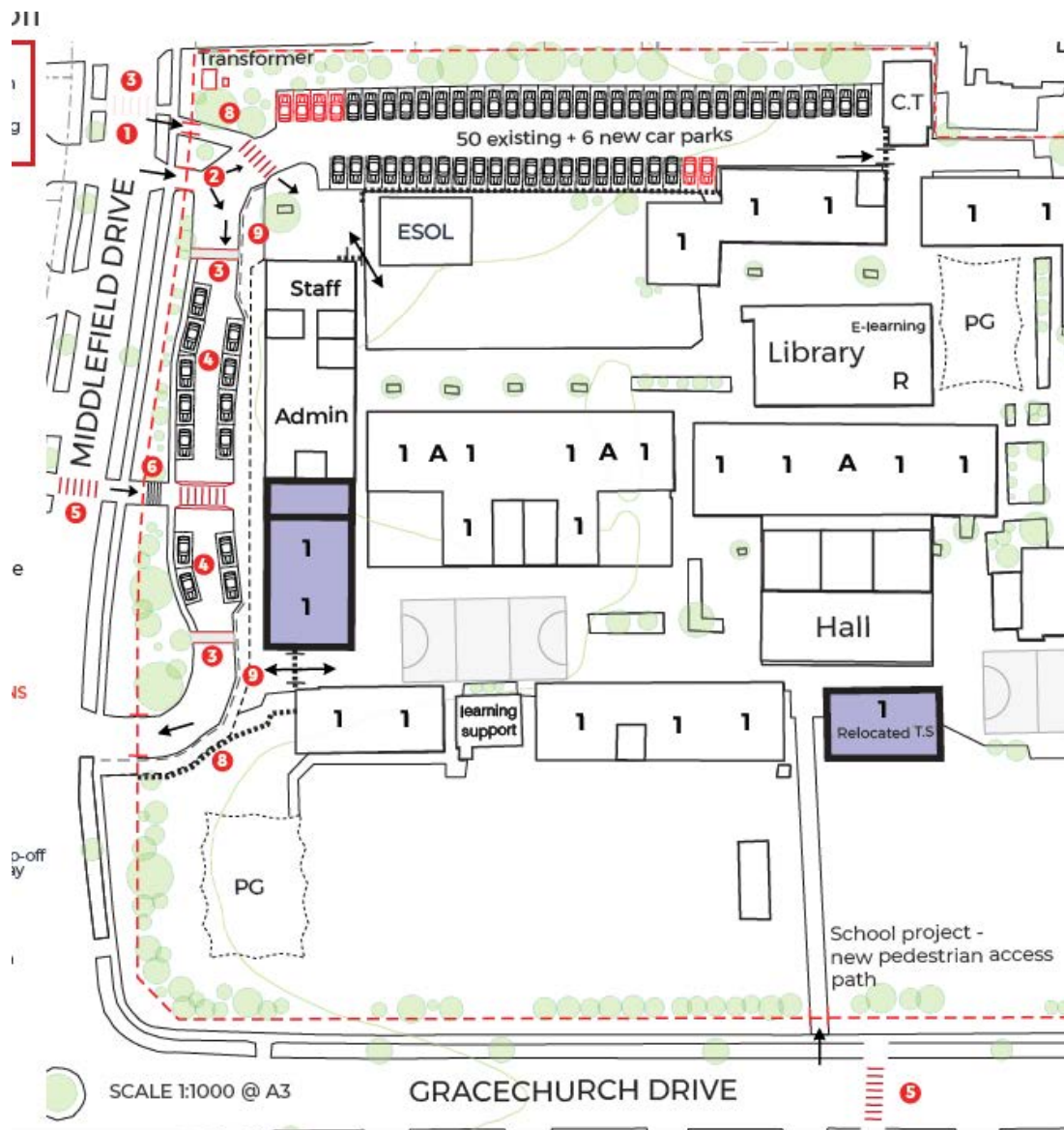


Figure 4.1 Parking layout for Stage 1 Build

Masterplan Build

The Masterplan Build will include a total of 75 parking spaces, including 62 staff car parks and 13 PUDO / visitor car parks. The parking layout is shown in Figure 4.2 below. Visitors that arrive during school hours (outside of school start and finish times) can utilise the student PUDO area. Utilising the PUDO area for different users, at different times of the day, results in a more efficient use of land.

The Masterplan stage of expansion will relocate the staff car park from the northern boundary to the south-western corner of the school. The majority of the car parks in the staff car park will be stacked in a tandem arrangement. The stacked parking arrangement can easily be managed well by the school as all staff and visitors enter and leave the school via the school office. It is recommended that all the parking spaces in the front row are assigned to staff only with no designated visitor parking in the front row. This will allow the school to effectively manage the stacked parking with a system for staff.

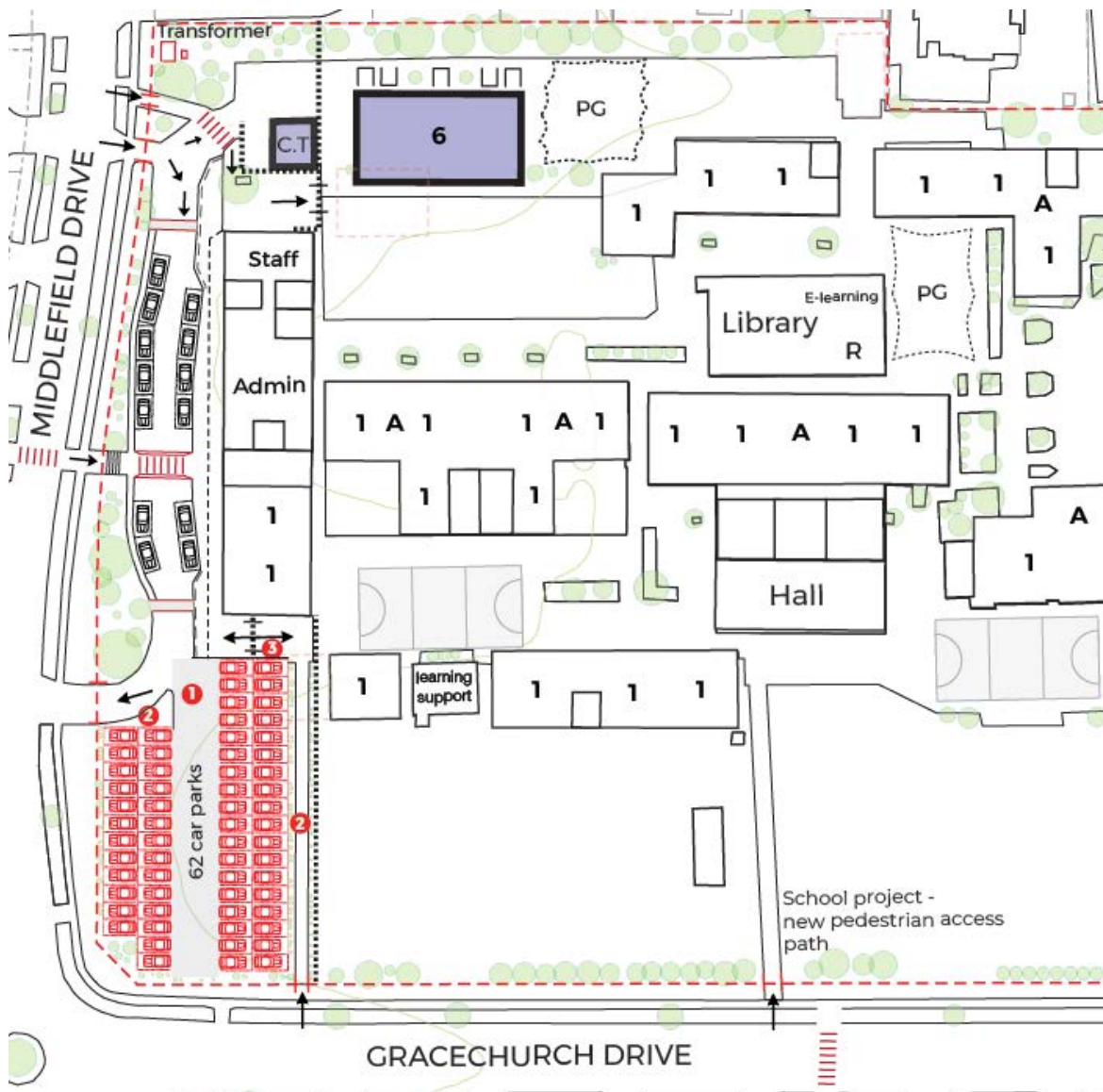


Figure 4.2 Parking Layout for Masterplan Build

4.2 PUDO Design

The school has concerns with the current design of the PUDO area for the reasons outlined in Section 2.1. The following design measures (refer to Figure 4.2) are proposed to mitigate the safety and operational concerns:

1. The pedestrian crossing on Middlefield Drive is proposed to be shifted slightly to the south with the new position between the two access points of the school. This location will be more convenient to access the school for students coming from the north and south. The new location will also resolve the current safety issue where through traffic is overtaking queued vehicles on the pedestrian crossing. The new location of the pedestrian crossing is subject to consultation with Auckland Transport and other stakeholders.
2. Narrowing down the entry and exit of the PUDO will reduce the speed of vehicles travelling through the PUDO area and ensure a single lane of traffic only.
3. Install a raised pedestrian crossing and two vertical speed humps throughout the PUDO area to further reduce speeds.
4. Widen the pedestrian entrance points into the school.

5. Widen the footpaths on the eastern side of the PUDO area to allow increased waiting room for students. These widened footpaths propose to have barriers to ensure students have a safe waiting area without spilling out onto the roadway.
6. Signage instructing drivers not to leave their vehicles unattended (i.e. pick up and drop off only) or P2 (parking for 2 minutes only) at school start and finish times.

The design measures provided above have been developed in consultation with the Principal of Willowbank School and considered an improved outcome that address the existing concerns. Suitable design changes can be addressed in future Outline Plans required for school expansion.

4.3 Pedestrian Crossings (On-street)

The expansion of the school proposes changes to the two pedestrian crossings on Willowbank Drive and Gracechurch Drive.

Middlefield Drive

It is proposed that the existing zebra crossing on Willowbank Drive which is relocated approximately 55m south, for reasons provided in Section 4.2. It is recommended that the new zebra crossing on Willowbank Drive is constructed as a raised platform, however this will be subject to consultation with Auckland Transport.

The new crossing location will inevitably result in the removal of some on-street parking spaces on the western side of Middlefield Drive. However, the removal of the existing zebra crossing will be replaced by on-street parking, which will likely result in no loss of parking overall on Middlefield Drive.

Gracechurch Drive

A new pedestrian walkway is proposed through the school field and linking up with Gracechurch Drive, as shown on **Figure 2.5**. The existing Kea Crossing on Gracechurch Drive is proposed to be relocated approximately 80m further west to line up with the new accessible path. It is proposed that the relocated crossing will remain as a Kea Crossing which is adequate for use for a secondary access to the school. The type of crossing will be subject to consultation with Auckland Transport, who may wish to upgrade the crossing to a raised zebra crossing if considered beneficial to the wider community.

The new crossing location will inevitably necessitate the removal of some on-street parking spaces on both sides of Gracechurch Drive. However, the removal of the existing Kea Crossing will be replaced by on-street parking, which will likely result in no loss of parking overall on this block of Gracechurch Drive.

5. Parking Assessment

5.1 Staff and Visitor Parking

National Policy Statement – Urban Design

The National Policy Statement on Urban Development 2020 issued by the Ministry for the Environment in July 2020 includes a new policy (Policy 11) which removes a requirement for a minimum number of car parks for a particular development.

The purpose of Policy 11 is to enable greater supply and ensure planning is responsive to changes in demand, particularly in urban areas where there is good accessibility to public transport and alternative travel modes. It enables the space to be used for higher value purposes rather than car parking.

It should be noted that the change in policy does not affect the requirement for accessible car parks which remains as existing.

This parking review has taken guidance from the AUPOP, the existing modal share and accessibility to public transport to support a condition for a reduced parking requirement for the masterplan build. The proposed reduction in parking provision is considered to be consistent with the outcomes intended by Policy 11 in the NPS-UD.

Car parking Requirements as per Auckland Unitary Plan – Operative in Part.

The number of car parks recommended for the Stage 1 Build and the Masterplan Build has been assessed against the transport rules of the Auckland Unitary Plan (Operative in Part) Chapter K Designations for Ministry of Education. The parking guidance for primary schools in Chapter E27 have also been used for comparative purposes.

Chapter K – School Standard Designation Requirements

The standard designation conditions for the number of required car parks is stated below:

On-Site Car Parking – Schools: Additional on-site car parking shall be provided at the rate of two car parks per new classroom or classroom equivalent, except where the council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer and/or transportation planner, that a lesser level is appropriate. For the avoidance of doubt, this condition shall only apply where there is a net increase in the number of classrooms or classroom equivalents.

The existing school has 32 classrooms and propose to add a further 6 classrooms for the masterplan build. There are currently 56 parking spaces allocated to staff and visitors and 7 PUDO car parks. We understand that the original designation condition in the Manukau District Plan required 2 car parks per classroom and as such the current school configuration may not be meeting its current parking requirement.

The Stage 1 Build will accommodate 34 teaching spaces/classrooms. Referring to the above condition, two car parks per classroom results in a total of 68 car parks for staff and visitor parking.

The Masterplan Build will accommodate 38 teaching spaces/classrooms. Referring to the above condition, two car parks per classroom results in a total of 76 car parks for staff and visitor parking.

Alternatively, it could be calculated based on the existing number of car parks (56) for 32 classrooms, plus two car parks for each of the additional classrooms. This would result in a total of 60 parking spaces for Stage 1 Build and 68 parking spaces for the Masterplan Build. The school technically meets the on-site car parking condition however we have taken the more conservative approach of applying two car parks for each of the total number of classrooms, as the existing car parking provision is lower than the original parking requirement.

Chapter E27

For Primary School activities, E27.6.2.3 recommends a minimum parking provision of 0.5 car parks per FTE employee plus 1 visitor space per classroom. It is understood that the new school build will employ around 45 FTEs (based on a 1:20 staff-student ratio) and 34 classrooms for Stage 1 and 50 FTEs and 38 classrooms for the Masterplan. This results in a requirement for 57 parking spaces for Stage 1 Build and 63 parking spaces for the Masterplan build.

Table 5.1 shows the recommended and proposed car parking provision as per the AUP-OP.

Stage	Recommended no. of car parks		Proposed no. of car parks		
	AUPOP Standard School Designation Condition (Chapter K)	AUPOP E27 (Table E27.6.2.3)	Total no. of on-site car parks	Staff / Visitor car parks	PUDO / Visitor car parks
Stage 1 Build	68	57	69	56	13
Masterplan Build	76	63	75	62	13

Table 5.1 AUPOP Parking Guidance vs proposed car parking numbers

As presented in **Table 5.1** the total number of parking spaces provided on-site for the Stage 1 Build (69 spaces) exceeds both of the AUPOP recommendations for number of car parks. For the Masterplan build, the proposed number of parking spaces (75) exceeds the E27 recommendation by 12 car parks and falls short by one car park for Standard Designation condition. The total number of car parks used for this assessment includes the PUDO spaces as the PUDO spaces will double up as visitor parks outside of the school start and finish times.

Accessible Parking

The AUP-OP refers to the NZS 4121-2001 standard which defines the following accessible parking requirements:

Total no. of car parks	Number of accessible parks
1-20	Not less than 1
21-50	Not less than 2
For every additional 50 car parks or part of a car park	Not less than 1

The activity proposes 75 parking spaces to service the school; therefore 3 mobility parking spaces are required. Two accessible parks are provided in the proposed car park for both stages of the school build. There is also the pick up drop off zone outside the front door of the school office that could be used by mobility users. The provision for accessible parks at the school is considered appropriate.

Assessment of Staff and Visitor Car Parking Provision

The total number of on-site car parks proposed for school staff and visitors, including the number of PUDO spaces for use by visitors, is 69 parking spaces for Stage 1 and 75 for the Masterplan build. The total number of car parks generally meet the designation condition of two car parks per classroom (with a shortfall of one parking space for the Masterplan build).

For the purpose of assessing the staff car park numbers only (without consideration of the PUDO/visitor parking spaces), there are 56 parking spaces as per the Stage 1 Build and 62 parking spaces as per the Masterplan Build. This is fewer than the AUPOP guidance specified in the standard conditions provided in Chapter K which recommends 68 and 76 car parks respectively. The number of car parks to be provided through the Masterplan development is considered appropriate for the reasons provided below.

- Thirteen car parks in addition to the staff car park are proposed at the front of the school as part of a Pick-up / Drop off (PUDO) area for school students. Visitors that arrive during school hours (outside of school start and finish times) can utilise the student PUDO area which is a preferred option as intuitively a visitor is more likely

to park at the front of the school entrance. Utilising the PUDO area for different users, at different times of the day, results in a more efficient use of land.

- Surveys showed that there is some existing capacity within the staff car park with peak occupancy reaching 89% in the morning peak with seven available parking spaces. Towards the end of the school day, there were 18 car parks available, with an occupancy of 71%.
- Willowbank School is well positioned for staff to travel to/from school via public transport, with two key bus routes within 300 metres of the school.
- In the event of the carpark being at capacity, there is plenty of on-street car parking available on the surrounding streets to accommodate any overspill without any noticeable effect. Our parking surveys indicate there is ample (over 70%) capacity on the surrounding streets during school hours.
- Willowbank School is a Travelwise school which aims to reduce dependency on single use vehicle trips for staff as well as students. These measures support the need for a lower number of carparks required to service the site.
- A traffic assessment will be submitted with each stage of the Masterplan development in support of each outline plan of works and in accordance with the standard MOE designation carparking condition.

5.2 Student Pick Up / Drop Off Parking

Students travelling to school by car are either dropped off and walk independently into school, or alternatively park and are escorted into the school grounds. The latter tends to be more common for the younger students, say Years 0-2.

There is little research or data available on the flow rate for pick up drop off (PUDO) area for schools. Abley undertook surveys at two Auckland primary schools in 2019/2020 (Gladstone Primary School in Mt Albert and Silverdale Primary School) to understand how many vehicles can effectively utilise a PUDO during the school start and finish times. Survey results are included in Appendix A. Our findings were as follows:

- The average vehicle dwell time for drop offs in the morning was 39 seconds.
- The dwell time in the afternoons was unsurprisingly considerably longer with vehicles waiting approximately 5 minutes after school finish time before departing. However, vehicles continued to use the PUDO for 20 minutes after school finish time with shorter dwell times after the initial waiting period.
- The average number of students was 1.4 students per vehicle
- The drop off peak in the mornings was relatively consistent for the twenty minute period before school start time.
- A significant number of caregivers park their vehicle outside of the PUDO area to walk their child/ren to and from the classroom. This is more likely the case for the younger children that may need escorting to and from the classroom as many schools require the caregiver to collect younger children from the classroom.

PUDO Demand

There are two areas at Willowbank School where pick up and drop off of students can occur, namely:

- The on-site PUDO area at the front of the school with access off Middlefield Drive.
- The on-street PUDO area on the northern side of Gracechurch Drive, between Middlefield Drive and Carbisdale Road.

A number of assumptions have been made to ascertain the demand for PUDO spaces, some of which have been based on the previously mentioned school survey results, and are listed below:

- An average vehicle dwell time of 39 seconds, and a 20 minute drop-off peak in the mornings.
- An average number of students is 1.4 students per vehicle

- Approximately 30% of caregivers park their vehicle outside of the PUDO area to walk their child or children to and from the classroom. This is more likely the case for the younger children (Years 0-2) that may need escorting to and from the classroom.
- A car modal share of 50% (Willowbank School has an average car modal share of 49%)

AM Peak

With a dwell time of 39 seconds per vehicle and an average of 1.4 students per vehicle, this equates to 1 parking space catering for 2.3 students per minute. With a morning peak of 20 minutes this equates to 46 children per PUDO space. The assumption is made that the caregivers of Year 0-2 students park their vehicles and walk their child or children into the school grounds. The remaining say 70% of students (Years 3-6) are assumed to use the PUDO.

For a potential future roll of 1000 students and an adopted modal split of 50% vehicle use equates to approximately 500 students arriving by car. Assume approximately 70% (Years 3-6) will utilise the PUDO over a 20-minute period in the morning peak. By applying the factor of 46 children per PUDO space, this results in a **PUDO demand of 8 parking spaces in the AM Peak**.

For the purpose of sensitivity testing, we have tested the conservative scenario of all students using the PUDO rather than a proportion being escorted into the school. This scenario would result in a PUDO demand of 11 parking spaces in the AM Peak.

PM Peak

Demand in the afternoon peak when students are being picked up from school is more difficult to cater for as caregivers often park and either wait for their child/ren to walk out to the car or walk to the classroom to pick up their child/ren.

It is not considered practical to provide enough PUDO spaces to cater for the relatively high volumes of vehicles that require carparks for the 15 minute peak right on school finish time. There are more practical ways to manage this demand through the school travel plan, such as staggering pick up times over a 15-minute period; identifying park and walk locations in vicinity of the school; and on-street parking zones where caregivers and students organise a pick up location in advance. The surveys undertaken for this report show that the afternoon pick up currently operates within capacity on surrounding streets, within a 200m distance of the school. Therefore, such measures are not considered necessary for the Masterplan Build.

The school drop off time in the morning peak coincides with the network peak. It is therefore more pertinent to manage the transport effects on the road network during the busy morning peak. However, school finish time is less of a concern as there is considerably less traffic on the roads in the inter-peak.

The overspill of vehicles that cannot be accommodated in the PUDO area in the afternoon peak will need to utilise on-street parking on the streets surrounding the school. There is ample on-street parking within a short walk of the school as detailed in Section 3.1.

Assessment of Pick Up Drop off Car Parking Provision

Both stages of the school proposal, Stage 1 Build and Masterplan Build, offer 13 on-site PUDO spaces at the school entrance. The proposed 13 spaces in the PUDO area are considered sufficient for the morning peak to operate safely and efficiently. The afternoon peak will likely need to utilise the on-street car parking spaces as overflow to the PUDO parking.

The parking surveys show that there is sufficient on-street parking availability within 200m of the school site at both school start and finish times. The surveys were undertaken when the school roll was just over 800 students. The on-street parking availability was over 35% in the mornings and over 20% availability in the afternoons. There is also ample parking capacity on the surrounding streets more than 200m from the school site without the need for school traffic to impact on the arterial road network. It should be noted that the 13 proposed PUDO parks are in addition to the on-street capacity as the PUDO was not in operation during the parking surveys.

The additional 13 PUDO parking spaces will allow for a more efficient turnover of vehicles as opposed to on-street parks. Systems that allow for children to wait adjacent to the PUDO and go directly to the vehicle as it pulls into the PUDO will ensure a higher turnover of vehicles. The use of the PUDO also allows caregivers to arrive a few minutes after school

finish time as the children will be safely waiting within school grounds. This allows for a greater distribution of school traffic through the afternoon peak.

The on-site PUDO and the parking capacity on the surrounding streets are considered adequate to operate efficiently and safely at the school roll anticipated for the Masterplan Build.

5.3 Cycle Parking

Cycle Parking – AUPOP Requirement

The requirement for bicycle parking in Table E27.6.2.5 of the AUPOP is provided below.

Visitor (short stay) cycle parking - The visitor (short stay) parking rate is 1 space plus 1 space per 400 students and FTE employees. The school is therefore required to provide 4 visitor cycle parks.

Long stay cycle parking - The secure (long stay) parking rate is 1 per 30 students in Year 1 to 5; plus 1 per 15 students in Year 6 plus 1 per 20 employees.

The school caters for Year 0 – 6 therefore it is assumed that 1 in 6 students will be in Year 6. For a proposed roll of 1000 students this results in a requirement for 42 secure cycle stands.

Overall a total provision of 46 cycle stands (short and long stay) would be needed to meet the recommendations of E27.6.2.5 of the AUPOP. However, there are no conditions in the Designation requiring a minimum number of cycle parks.

Cycle Parking Provision – Assessment

There are currently ten cycle stands at the school, with ample room to extend the cycle racks when demand grows.

The travel survey results indicate that there is a low uptake in cycling to school, with only one student recorded as cycling. It is understood that the school does not encourage students from Years 0-5 to cycle unless they are accompanied by an adult. It is recommended that the school continue to provide cycle racks if and when demand grows.

6. Conclusion

This Transport Assessment reports on the existing and future transport and parking demands for school staff, visitors and student pick-up and drop off. Our conclusions include:

- The crash history on the surrounding streets does not indicate a road safety issue in the area.
- The school is well serviced by public transport.
- The future stages of expansion of the school will include 13 Pick up Drop off (PUDO) parking spaces.
- There is currently on-street parking capacity at school start and finish times, within a 200 metre walk to the school. The proposed PUDO spaces and the on-street parking capacity is considered to be sufficient to cater for the Masterplan school roll of 1000 students.
- The existing staff and visitor car park currently has some capacity. The additional car parking proposed as the school grows is considered appropriate.
- The stacked parking arrangement proposed at Masterplan Build is considered adequate and can be managed through the school office.
- Observation surveys did not raise any safety or operational issues on the surrounding streets during the busy school pick up / drop off period.
- The intersections on Middlefield Drive were observed to operate at a good level of service.
- Design changes to the PUDO and the on-street pedestrian crossings as outlined in Section 4.2 are considered acceptable.

Overall, the removal of the school roll cap and the further expansion of the school to a masterplan roll of 1000 students is considered acceptable from a transport perspective.

Appendix A - Survey Results:

- 1. Parking Surveys Results**
- 2. Queue Length Surveys at Intersections**
- 3. PUDO Surveys (at other schools)**

MORNING PARKING SURVEY RESULTS

MORNING - WILLOWBANK SCHOOL PARKING SURVEYS - 8/12/2020

	Gracechurch East	Gracechurch PUDO	Carbisdale Rd	Middlefield Dr	Willowbank Close
Time	A	B	C	D	E
8:28	13	18	6	4	4
8:31	13	21	6	8	6
8:34	13	18	7	5	5
8:37	14	22	7	7	6
8:40	14	20	6	9	8
8:43	15	15	6	3	4
8:46	4	8	6	3	9
8:49	4	13	6	3	2
9:15	3	6	6	4	3

AFTERNOON PARKING SURVEY RESULTS

AFTERNOON - WILLOWBANK SCHOOL PARKING SURVEYS 8/12/2020

	Gracechurch East	Gracechurch PUDO	Carbisdale Rd	Middlefield Dr	Willowbank Close
Time	A	B	C	D	E
2:55	22	28	9	14	15
2:58	22	28	10	14	14
3:01	22	28	10	14	16
3:04	22	25	9	14	12
3:07	13	14	6	10	7
3:10	3	10	5	6	6
3:13	3	6	6	5	6
3:16	3	5	6	6	2
3:30	2	3	6	1	4

	Glastry Close	Gracechurch West	Middlefield South	Edzell close	Middlefield north of Glastry
Time	F	G	H	I	J
2:55	13	21	0	5	7
2:58	13	21	0	5	7
3:01	14	21	0	5	7
3:04	12	22	0	5	5
3:07	9	17	0	4	4
3:10	8	12	0	4	2
3:13	6	9	0	2	2
3:16	3	10	1	2	2
3:30	2	6	0	2	0

Gladstone School Number of PUDO users Thursday 19 December 2019 PM Peak		Gladstone School Number of PUDO users Friday 6 March PM Peak	
before 3:00	6	before 3:00	7
3:00-3:05	8 PUDO full	3:00-3:05	3
3:05-3:10	12	3:05-3:10	4
3:10-3:15	7	3:10-3:15	3
3:15-3:20	0	3:15-3:20	5
Total	33	Total	22

Silverdale Primary School Number of vehicles entering PUDO Monday 16 March 2020 AM Peak		Silverdale Primary School Number of vehicles entering PUDO Monday 16 March 2020 PM Peak	
8.15-8.20	5	before 2:45	15 PUDO full
8.20-8.25	4	2:45-2:50	6 stacking through PUDO evident
8.25-8.30	19	2:50-2:55	10 stacking through PUDO evident
8:30-8:35	35	2:55-3:00	5 stacking through PUDO evident
8:35-8:40	20	3:00-3:05	2
8:40-8:45	23	3:05-3:10	14
8:45-8:50	3	3:10-3:15	0
		3:15-3:20	5
		3:20-3:25	2
Total vehs	110	Total	59

Gladstone School PUDO Dwell Time (seconds) Thursday 19 December 2019 AM Peak		Gladstone School PUDO Dwell Time (seconds) Friday 6 March AM Peak	
	15	21	28
	45	59	38
	82	35	30
	54	14	20
	24	37	55
	32	35	90
	26	76	34
	12	12	18
	57	60	73
	54	44	15
	25	54	25
Average (secs)	39	Average (secs)	37
Total Average (secs) from both surveys		38	

Gladstone School		
Number of students per vehicle		
Thursday 19 December 2019		
AM Peak		
	1	2
	1	1
	1	2
	1	1
	1	2
	2	1
	1	2
	1	2
	1	2
	2	2
	1	1
	2	1
	2	
Average		1.4 students per vehicle

Appendix B

Crash Analysis Report



Untitled query

Crash year
2016 - 2020
Saved sites
Willowbank.2

Plain English report

8 results from your query.

1-8 of 8

Crash no.	Side road	Distance towards main road	Event	Direction	Suburb	Station	Event	Machine	Latitude	Longitude	Altitude	ID	Date	Day of week	Time	Description of events	Crash factors	Surface condition	Natural light	Weather	Junction	Control	Casualty count	Casualty count	Casualty count	Social cost
GRACECHURCH DRIVE	CARRISDALE ROAD	50m	W				3770470	5908935	174.914531	-35.949899	201716096	2017/07/2017	Sun	02:15	Car/Wagon1 WOB on Gracechurch Drive hit parked veh, Car/Wagon1 hit from specific parked, Car/Wagon2 hit from specific parked	CAR/WAGON1, alcohol test above limit or test relaxed, too far left	Dry	Dark	Fine	Nil (Default)	Unknown	0	0	1	0.02	
GRACECHURCH DRIVE	CARRISDALE ROAD	40m	E				3770896	5908965	174.913970	-35.949947	201847066	22/08/2018	Wed	01:30	Car/Wagon1 WOB on GRACECHURCH DRIVE, FLAT BUSH, AUCLAND hit parked veh, Car/Wagon1 hit from specific fence, non-specific parked	CAR/WAGON1, too far left	Wet	Dark	Light rain	Nil (Default)	Unknown	0	0	0	0.02	
GRACECHURCH DRIVE	MIDDLEFIELD DRIVE		I				3770892	5909014	174.913666	-35.949939	202016284	17/01/2020	Fri	19:25	Bus1 WOB on GRACECHURCH DRIVE hit Cycles2 (Age 35) crossing at right angle from right	BUS1, alcohol test below limit, did not check/notice another party from other dirn, failed to give way at priority traffic control	Dry	Bright sun	Fine	Roundabout	Give way	0	0	1		
GRACECHURCH DRIVE	MIDDLEFIELD DRIVE		I				3770891	5909014	174.913666	-35.949937	202017052	24/11/2020	Tue	07:45	Car/Wagon1 WOB on GRACECHURCH DRIVE hit Cycles2 (Age 46) crossing at right angle from right	CYCLE2, alcohol test below limit CAR/WAGON1, alcohol test below limit, failed to give way at priority traffic control	Dry	Overcast	Fine	Roundabout	Give way	0	0	1		
GRACECHURCH DRIVE	MIDDLEFIELD DRIVE		I				3770893	5909014	174.913687	-35.949941	201820950	17/12/2018	Mon	08:18	Car/Wagon1 WOB on GRACECHURCH DRIVE hit Motorcycle crossing at right angle from right	MOTORCYCLE2, alcohol suspected CAR/WAGON1, alcohol test below limit, did not check/notice another party from other dir n, failed to give way at priority traffic control	Dry	Bright sun	Fine	Roundabout	Give way	0	1	0	0.82	
MIDDLEFIELD DRIVE	GRACECHURCH DRIVE	70m	N				3770899	5909093	174.913727	-35.948830	201639299	30/05/2016	Mon	15:15	Car/Wagon1 NDB on MIDDLEFIELD DRIVE hit parked veh, Car/Wagon1 hit from specific parked	CAR/WAGON1, too far left	Wet	Overcast	Light rain	Nil (Default)	Unknown	0	0	0	0.02	
MIDDLEFIELD DRIVE	GRACECHURCH DRIVE	36m	N				3770385	5909062	174.913624	-35.949106	202017943	08/08/2020	Sat	16:45	Left scene1 NDB on MIDDLEFIELD DRIVE hit parked veh, Left scene1 hit parked (unattended) vehicle	LEFT SCENE1, too far left	Dry	Overcast	Fine	Nil (Default)	NI	0	0	0		
MIDDLEFIELD/GRACECHURCH PAB	GRACECHURCH DRIVE		I				3770374	5909021	174.913467	-35.949482	2018101633	15/12/2018	Sat	17:15	Car/Wagon1 ED on GRACECHURCH DRIVE, EAST TAMAKI HEIGHTS, AUCLAND hit Car/Wagon2 crossing at right angle from right	CAR/WAGON1, failed to give way at priority traffic control	Dry	Bright sun	Fine	Roundabout	Give way	0	0	0	0.02	

Appendix C

Response to Submissions

Willowbank School

Pre-lodgement feedback from neighbouring properties

The proposed expansion and removal of the roll cap for Willowbank School was consulted with neighbouring properties of the school. Three property owners have provided feedback with matters related to traffic, which were of a very similar nature.

The properties at 93 Gracechurch Drive are directly adjacent to the eastern boundary of the school site where there is a pedestrian pathway into the school that is well used. Meetings for two of the property owners over MS Teams were conducted on the week commencing 1 November where the traffic issues were discussed.

The owners have raised similar issues (in bold and italics), followed with Abley's response.

Our driveway is regularly blocked (on a daily basis) by parents dropping off and picking up students. We have a very busy shared driveway with at least 10 vehicles requiring access. An increased roll would increase our access issues.

Traffic congestion around the school at drop off and pick up time is already very dangerous, with incidents of children nearly being hit by cars witnessed regularly. There is limited parking around the school and there are not many safe options for parking further away from the school. Travelwise does not appear to alleviate any congestion at our end of the school.

We also have periodic problems with parent's parking their cars across our drive and sometimes up our drive and onto our property. While we are aware that this is not directly a problem of the school's making, any improvements that can be made to traffic management and control in the area during drop off and pick up would be appreciated.

The parking surveys show that there is currently on-street parking capacity in both the mornings and afternoons within 200m of the school, at the peak times. Drone footage was studied and there were generally minimal driver behaviour issues on Gracechurch Drive or Middlefield Drive with cars blocking driveways. However, there were some instances of vehicles blocking the driveways at 93C and 93E Gracechurch Drive. The drone footage showed that there was alternative parking available outside the school at the time when vehicles were blocking the driveways. This suggests that it is a behavioural issue as opposed to no other parking options available. However, we also acknowledge that parking is in high demand for the peak 10-15 minutes before and after school. The following mitigation may help alleviate this issue:

- I. It is proposed to construct a new pedestrian pathway on Gracechurch Drive approximately 80m to the west of the existing pedestrian access; and relocate the existing pedestrian crossing to align with this path. The new pedestrian access located away from the properties at 93 Gracechurch Drive may in turn shift the highest demand for parking away from 93 Gracechurch. Whilst closing off the existing pedestrian crossing adjacent to 93 Gracechurch Drive was discussed with neighbours during consultation, the school itself does not favour closing this crossing as it provides more direct and distributed access points to classrooms.
- II. The proposed expansion of the school includes redesigning the on-site pick up and drop off (PUDO) area at the front of the school on Willowbank Drive. This will add an additional 13 parking spaces which are not currently in use. The operation of the PUDO area is expected to take pressure off the on-street parking capacity and provide a more efficient system for pick up and drop off.
- III. It is recommended the School consider utilising either the local Constable or AT Parking Officers to enforce this issue if vehicles continue to block driveways. It is understood this can be done alongside an education campaign through the TravelWise programme.

The streets around the school are narrow. Car parking on both sides of the road results in only one lane of traffic able to get through and causes congestion.

Gracechurch Drive has parking on both sides of the road. The road width along Gracechurch Drive is wide enough to allow for traffic to flow comfortably in both directions when parking is occupied on both sides of the road. This was also observed from the drone surveys.

Middlefield Drive outside the school has parking in one side of the road only. The road width on Middlefield Drive is wide enough to allow for traffic to flow comfortably in both directions when parking is occupied on one side of the road. This was also observed from the drone surveys.

Our surveys showed some queuing on Middlefield Drive primarily as a result of the high volume of students using the pedestrian crossing outside the school which at times backed through the Middlefield Drive and Gracechurch Drive roundabout. However, the queues clear quickly as the pedestrian crossing is patrolled.

Appendix D

Response to Auckland Council and Auckland Transport Feedback

WILLOWBANK SCHOOL - ABLEY RESPONSE TO AUCKLAND COUNCIL AND AUCKLAND TRANSPORT FEEDBACK ON DRAFT ITA REPORT – DECEMBER 2021

AUCKLAND COUNCIL FEEDBACK

Comment	Abley Response
<p>1. The Transport Assessment [TA] assessed the effects of an expansion of the roll to 1000 students; however, the proposed alteration seeks to delete the existing cap rather than amending it to 1000 students. Please provide additional information on how the roll could be limited to 1000 students or provide an assessment of the effects from a greater roll.</p>	<p>The master plan brief was to accommodate a roll of 900 students. 1000 has been used for the purposes of the transport assessment which is a conservative assessment and accounts for potential additional growth. The Minister does not favour roll caps on its designations and generally there are no roll caps on schools designated in the Auckland Unitary Plan.</p>
<p>2. The TA describes the loading situation noting that the “loading arrangement will remain the same for the future stages of school expansion”. The northern part of the school, where it appears all truck movements currently occur, is expected to have significant change in future. Please provide details of the truck and other servicing traffic arrangements and movements for the existing and proposed site layouts, including how truck turning and reversing movements are proposed to be accommodated.</p>	<p>Manoeuvring of trucks on-site is an OPW matter and will be incorporated into the design at later stages. However, it is expected that adequate manoeuvring space will be included on-site to ensure minimal reversing on-site and no reversing onto or off the road (see Section 2.3 of the revised ITA).</p>
<p>3. Please provide a map showing the physical extents of the survey areas A to J noted in the appendix to the TA.</p>	<p>Figures 3.1 and 3.2 are updated with parking zones labelled A to J.</p>
<p>4. During Mr Edwards’ visit to the area on the afternoon of 19 November he observed school-related on-street pick-up parking in streets not included in the TA survey, including Rialto Court and Thornberry Crescent. Please expand the physical extent of the on-street parking survey to include a wider area, including at least those streets identified above, to ensure that all areas used for pick-up and drop-off parking are measured. Note – it may be beneficial to provide a better understanding of the on-street parking situation if the surveys covered a longer period before and after school to cover the increase and decrease in parking demand.</p>	<p>The drone footage didn’t always capture Rialto Close and Thornberry Crescent. However, we’ve undertaken further analysis from the drone footage that is available for this area and conclude that in the mornings, these streets were not utilised for school pick up and drop off. However, in the afternoons, there was school traffic utilising these streets, with approximately 30-40% parking availability remaining throughout the afternoon pick up period. We have not updated the parking survey results to include these roads as the data is not regular enough to match the data on the surrounding roads, and it will not dramatically change the results. In fact, it would result in a favourable result as the addition of Thornberry Crescent would increase the average parking capacity in proximity to the school.</p> <p>In regard to extending the survey times. The morning survey time started when children are allowed to enter the school grounds (8.30am) and finished once the school bell rang. In the afternoons, the surveys started 5 minutes prior to the school bell ringing and finished once the majority of the children had left the premises. It is recognised that caregivers likely arrive prior to 2.55pm for the afternoon pick-up however at every other time it would be unlikely that there would be any school traffic to survey. Extended</p>

	survey times are not thought to provide any additional benefit or conclusions to the parking study outcomes.
<p>5. The recommendations for the supply of on-site parking are dependent upon observations of parking demand during two short periods on one day. Please provide data to demonstrate that the maximum demand for on-site parking occurs during the times surveyed, and/ or provide additional survey data from other times of day.</p> <p><i>Advice Note: The strength of the parking supply recommendation would be improved by providing survey data from additional days. Ideally this would include a winter period with poorer weather when people may be less likely to use active modes or public transport</i></p>	This query is now obsolete as MOE have since agreed to adopt the standard AUP school designation parking condition of 2 on-site parking spaces per additional classroom.
<p>6. The TA is recommending the pedestrian crossing on Middlefield Drive is relocated approximately 55m to the south (with the form and location to be determined in consultation with Auckland Transport). Please provide details on the impact this change would have on the supply of on-street parking spaces, and how the relocation of the crossing may impact on other road users including people accessing the childcare centre located close to the existing crossing.</p>	<p>There is unlikely to be any net loss of parking spaces with the relocation of the pedestrian crossing, as further parks will be gained at the location of the current crossing.</p> <p>The new crossing location is a safer option as it will be removed from the entrance to the PUDO which is causing some safety issues. Desire lines will largely be retained for the childcare centre, aside from pedestrians coming from the north and walking on the western side of Middlefield Drive. In this scenario, pedestrians would need to walk an additional 100m to access the crossing. All pre-school children are escorted to and from the centre and will therefore be in the presence of adults when crossing the road. Effects on the childcare centre are therefore considered to be minimal.</p>
<p>7. A new pedestrian access point to the school is proposed near the relocated pedestrian crossing on Middlefield Drive. Please demonstrate there is sufficient space to accommodate a pedestrian gate and a stair between the site boundary and the footpath along the edge of the PUDO area or provide drawings of a revised PUDO area with an updated number of parking spaces that can be provided. <i>Note – this may be able to be provided at Outline Plan stage?</i></p>	This will be confirmed at OPW stage.
<p>9. The TA assessment of on-site PUDO parking is based on several assumptions that are said to be based on previous surveys. Please provide details to support the assumption of average 39s dwell-time during the peak 20-minute period in the morning, and the assumption that 30% of vehicular traffic would not use the PUDO area due to an adult escorting a younger child to their classroom.</p> <p><i>Advice Note: based on the TA analysis, the current roll of 809 students could be serviced by 6 PUDO spaces in the morning. This is not consistent with the observed on-street parking demand (with the PUDO closed) of at least 35 cars during the morning peak period (and over 110 cars in the afternoon peak period).</i></p>	<p>Section 5.2 in the revised ITA, and survey results in Appendix A, provides further information on the surveys undertaken at other schools.</p> <p>Two dwell time surveys were taken at Gladstone School. One day had an average dwell time of 39 seconds and the second survey day was 37 seconds. The more conservative average dwell time of 39 seconds was therefore adopted for the PUDO calculations.</p> <p>The assumption that 30% of vehicle traffic will not simply drop off/pick up their child and will instead walk their child into the classroom is based on the understanding that the junior years (years 0-2) require a caregiver to pick up their child up from the classroom (teachers often need to see the caregiver before releasing the younger children from the</p>

	<p>classroom). Years 0-2 likely makes up half the school, but this has been rounded to 30% as it is not a precise science and there are no known survey datasets available.</p> <p>We are proposing 13 PUDO spaces at Willowbank, therefore the PUDO calculations are well and truly exceeded.</p> <p>PUDO spaces are likely to be more efficient than on-street spaces, with a higher turnover. This is explained further in point 10 below.</p>
<p>10. To allow a better understanding of the future transport situation for residents and others please provide a map showing the estimated extents of on-street parking during the afternoon pick-up period in future allowing for areas where parking is not permitted.</p>	<p>There is currently around 20% capacity within 200m of the school site, which in theory would accommodate a 20% growth in the school roll. In addition to the capacity of on-street parking, there will be an additional 13 PUDO parking spaces available for future use. The PUDO spaces will allow for more efficient turnover of vehicles with systems in place that allows for children to wait adjacent to the PUDO and go directly to the waiting vehicle. The use of the PUDO also allows caregivers to arrive a few minutes after school finish time as the children will be safely waiting within school grounds. This allows a greater distribution of school traffic throughout the afternoon peak.</p>
<p>AUCKLAND TRANSPORT FEEDBACK</p>	
<p>Active Modes and Public Transport</p> <p>Please provide further information on the low cycling, scooter and public transport mode share and identify measures to better serve these modes. Please provide a safety assessment for active mode (pedestrians, cyclists, scooters, etc) access to the school, including on the surrounding routes to school. Where mitigations are identified, please comment on the feasibility and timing of implementation.</p>	<p>Please refer to Section 2.6 of the revised ITA. Cycling to school is generally not encouraged for primary aged school children, as the younger years tend not to have adequate judgement for cycling on their own. It is unlikely that Willowbank School would want to actively encourage younger children to cycle to/from school. The low public transport uptake is also typical of a primary school as young children would unlikely change a public bus on their own. The size of the school zone also does not lend itself to catching PT to/from school.</p> <p>Section 2.6 of the revised ITA provides a safety assessment of the routes to school. In summary, there are footpaths on both sides of the majority of roads and safe crossings points across the arterial roads in the school zone.</p>
<p>Trip Generation</p> <p>Confirm the existing vehicle trips generated by the school and detail the expected trips resulting from the growth proposed including staff trips and assess the impact this additional trip generation has on the intersections at Middlefield Drive / Gracechurch Drive and Middlefield Drive / Glastry Close. Please provide an assessment of the number of peak hour vehicle trips that can be generated by the site without vehicle queueing exceeding the stacking space of the intersections. The Transport Assessment lacks detail in considering these intersections.</p>	<p>Section 3.6 of the revised ITA provides an estimation of future traffic volumes and an intersection performance analysis of the two roundabouts on Middlefield Drive. A queue length survey was undertaken from the drone footage to assess the existing performance of the intersections. The surveys showed average queue lengths of 2.6 vehicles or less over the two peak periods. The roundabouts operate very well in both the mornings and afternoons and will comfortably accommodate any additional traffic expected with the growth of the school roll.</p>
<p>Miscellaneous</p> <p>Confirm if the designation still needs to provide for Early Childhood Education.</p>	<p>We can confirm the designation does not need to provide for an ECE.</p>

Provide confirmation as to when the 'future accessible path' to Gracechurch Drive is intended to be provided and whether MOE will take responsibility for ensuring this is provided - it is identified as a school project.	The school has funding for the internal path and installing it to be ready for when Stage 1 works are being completed. This will be clarified as part of the OPW.
The transport assessment has not sufficiently established that 1.75 parking spaces per classroom is sufficient to manage the effects of travel demand. In fact it is proposed to provide more than this ratio on site - though with stacking at 1000 roll and reliance on visitor parking in the PUDO area. There has been no consideration as to the effect on vehicle movements that stacking of car parking spaces can have. Please elaborate.	<p>We have removed the reference to 1.75 parking spaces per classroom and can confirm that we will provide the 2 car parks per classroom as per the existing standard designation condition.</p> <p>The stacked parking will be managed by the school office. The condition amendments proposed by Auckland Transport in regard to management of stacked parking as included in the resubmitted designation package was accepted by the Ministry of Education on behalf of the Minister.</p>
Please elaborate on the recommendation in the Transport Assessment that the school use either the local constable or AT parking officers for enforcement to stop the blocking of private driveways.	As discussed at our meeting with Auckland Transport and Auckland Council on 14 Dec 2021, it was confirmed (by AT) that schools do have the opportunity to call on AT parking officers or the local constable to enforce illegal parking behaviours. The school also actively addresses the issue of vehicles parking over driveways through the school newsletter.
Provide consideration of the activities common to schools such as sports matches, community events, fairs, or community activities which would be permitted by the standard conditions. In particular, their transport effects particularly given the proposed roll growth and changes in parking arrangements on site.	This is an operational issue that is not relevant to the alteration. These events are infrequent and are managed by the school on a case-by-case basis. If there is a need for a larger event to be held, they may choose an offsite location.
Please provide detail on the quantum and location of easy access mobility spaces (Refer to NZS 4121).	This is an OPW matter and will be addressed at a later stage.
Please provide information about the expected staffing numbers at 1000 roll as this is relevant for determining travel demand from staff and the adequacy of the proposed parking arrangements.	This is not provided as the Minister is no longer proposing an amendment to the standard carparking condition.
Please provide information about the existing loading facilities (e.g. for waste disposal and deliveries). The Transport Assessment says that these will remain unchanged but does not establish whether they are adequate or will be affected by other changes proposed on site to accommodate roll growth.	This will be confirmed at OPW stage and should not be a matter needing to be confirmed for an alteration to the designation.

Appendix D

2000 Consent Order

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an appeal under section 174 of the Act

BETWEEN **K G and L J STEVENSON**

(RMA 614/00)

Appellants

AND **THE MINISTER OF EDUCATION**

Respondent

BEFORE THE ENVIRONMENT COURT

Environment Judge D F G Sheppard

IN CHAMBERS at AUCKLAND on 7 September 2000

CONSENT ORDER

HAVING CONSIDERED the notice of appeal and the memorandum lodged on behalf of the parties **THE COURT HEREBY ORDERS BY CONSENT** that:

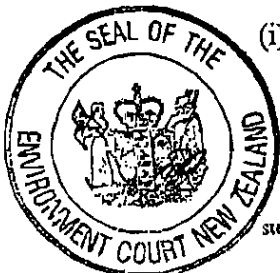
- (i) The respondent's decision upholding the designation is amended by adding the following condition:

The school will have a maximum roll of 540 pupils provided that the roll will be able to exceed 540 pupils up to a maximum of 700 pupils for a period not exceeding three years.

- (ii) In all other respects, the respondent's decision is confirmed.
- (iii) There is no order as to costs.

In accordance with the consent memorandum filed by the parties it is recorded that:


- (i) The Minister of Education does not consider that a condition limiting roll numbers is appropriate or necessary with regard to the designation.

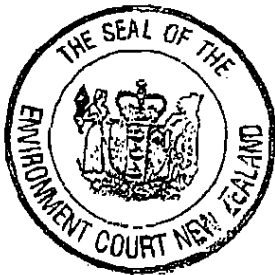


stevenson(consent).doc (sp)

07/09 '00 THU 17:52 [TX/RX NO 6082]

- (ii) The appellants remain of the view that such a condition is appropriate and necessary.
- (iii) The parties agree that it is essential for the school to open at the beginning of 2001 in order to relieve pressure on existing educational facilities in the East Tamaki Corridor area of Manukau City in order to promote the ongoing provision of adequate educational facilities for children in that part of Manukau City.
- (iv) In the circumstances the parties have agreed that the designation should be confirmed at this stage subject to a condition imposing a restriction on the maximum roll in the form set out above. The parties understand that the condition is without prejudice to the Minister's view that it is unnecessary and inappropriate and that the Minister reserves the right to lodge with Manukau City Council after the designation has been confirmed a requirement to alter the designation through removal of the condition. That will allow the issue to be determined substantively at a hearing in the future without compromising the establishment of the school.


 D F G Sheppard
 Environment Judge



stevenson(consent).doc (sp)

Appendix E

Standard Designation Conditions for Schools in Auckland Unitary Plan

Standard Conditions for All Education Designations

Explanatory Notes

1. Each of these designations enables the establishment of a school that is able but is not required to cater for all the school years listed in the designation description.
2. “Educational Purposes” for the purposes of these designations shall, in the absence of specific conditions to the contrary:
 - (i) Enable the use of the facilities on the designated site by and for the educational benefit of any school age students (ie: years 0 to 13) regardless of whether they are enrolled at any institution located on that designated site.
 - (ii) Enable the provision of supervised care and study opportunities for students outside school hours in school facilities
 - (iii) Enable the provision of community education (eg: night classes for adults) outside school hours in school facilities
 - (iv) Include but not be limited to the provision of academic, sporting, social and cultural education including through:
 - Formal and informal recreational, sporting and outdoor activities and competitions whether carried out during or outside school hours;
 - Formal and informal cultural activities and competitions whether carried out during or outside school hours; and
 - The provision of specialist hubs and units (including language immersion units and teen parent units) for students with particular educational requirements or special needs.
 - (v) Enable the use of facilities for purposes associated with the education of students including school assemblies, functions, fairs and other gatherings whether carried out during or outside school hours.
 - (vi) Enable the provision of associated administrative services; carparking and vehicle manoeuvring; and health, social service and medical services (including dental clinics and sick bays).
 - (vii) Enable the housing on site for staff members whose responsibilities require them to live on site (eg: school caretaker) and their families.
3. Where any standard condition conflicts with a site specific condition, the site specific condition shall take precedence.

Conditions

1. Height in Relation to Boundary

Any new building or building extension (excluding goal posts and similar structures) shall comply with the height in relation to boundary controls [attached to this Schedule] from any adjoining land zoned primarily for a residential purpose, or zoned for an open space/outdoor recreation purpose.

2. Noise

The noise (rating) level arising from the operation of the school must comply with the following noise levels when measured within the boundary of any residentially zoned site, or within the notional boundary of any site in any rural zone:

Time	Noise level
Monday to Saturday 7am to 10pm	55dB L _{Aeq}
Sunday 9am to 6pm	
All other times	45 dB L _{Aeq} 75 dB L _{AFmax}

These noise limits do not apply to noise from school sports and school recreational activities occurring between 8am and 6pm Monday to Saturday.

Noise levels shall be measured and assessed in accordance with NZS 6801:2008 "Measurement of Environmental Sound" and NZS 6802:2008 "Environmental Noise".

Noise from construction shall not exceed the limits recommended in, and shall be measured in accordance with, New Zealand Standards NZS 6803:1999 "Acoustics – Construction Noise".

3. On-Site Car Parking – Schools

Additional on-site car parking shall be provided at the rate of two carparks per new classroom or classroom equivalent, except where the council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer and/or transportation planner, that a lesser level is appropriate. For the avoidance of doubt, this condition shall only apply where there is a net increase in the number of classrooms or classroom equivalents.

4. On-Site Car Parking – Early Childhood Education (Preschool)

In addition to any car parking required for the school, on-site car parking for early childhood education (preschool) shall be provided at the rate of one car park per every 10 children the facility is licensed or designed to accommodate, plus one per each full time equivalent staff member required for the license or design capacity of the centre, except where the Council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer and/or transportation planner, that a lesser level is appropriate.

5. Scheduled Trees

No tree or group of trees specifically scheduled in the Unitary Plan may be cut, damaged, altered, injured, destroyed or partly destroyed, or works undertaken within the drip line of any such tree(s), other than in accordance with an outline plan submitted and processed in accordance with the s176A of the Resource Management Act 1991. This condition shall not apply to minor trimming or maintenance undertaken by hand operated secateurs or pruning shears in accordance with accepted arboricultural practice, or where removal or trimming is required to safeguard life or property.

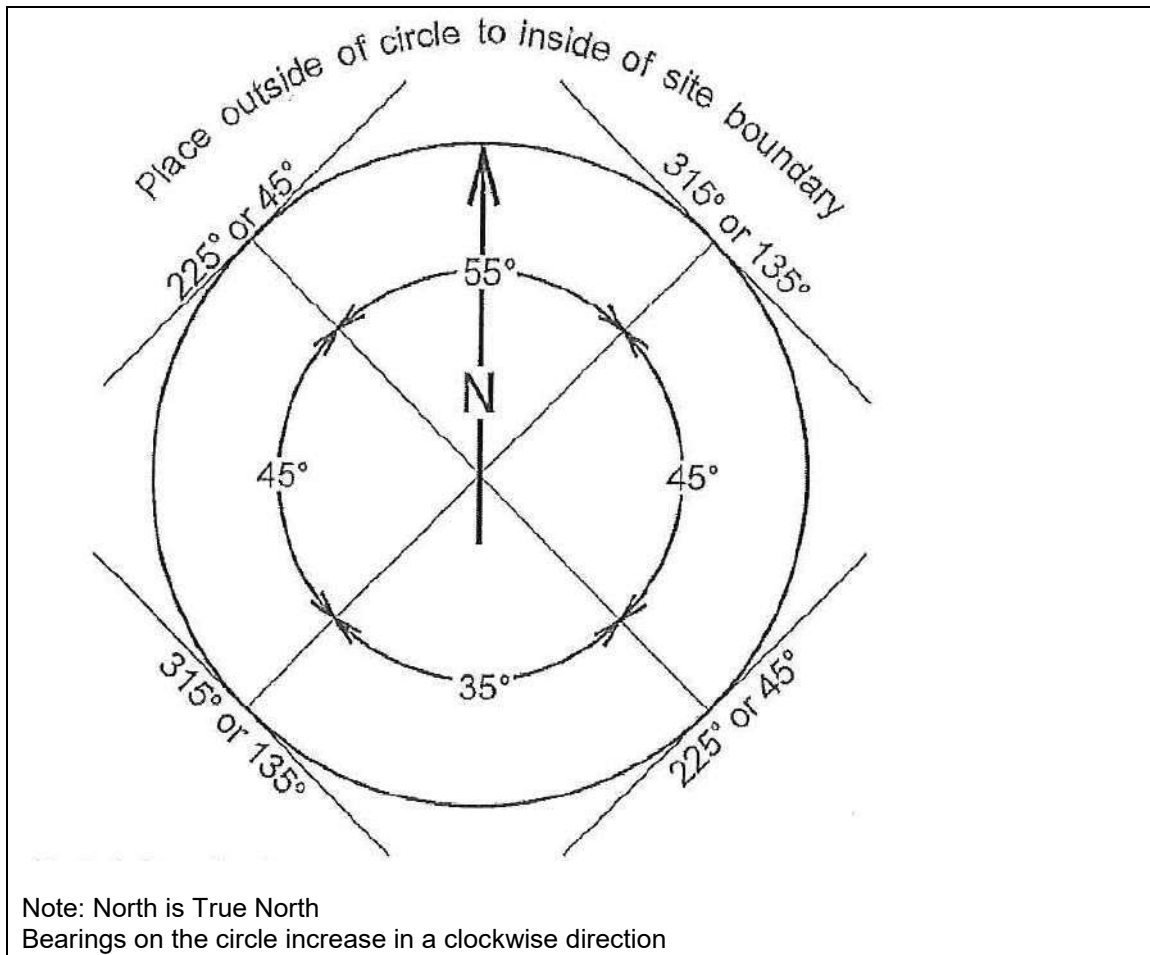
6. Outline Plans

That an outline plan of works shall not be required for:

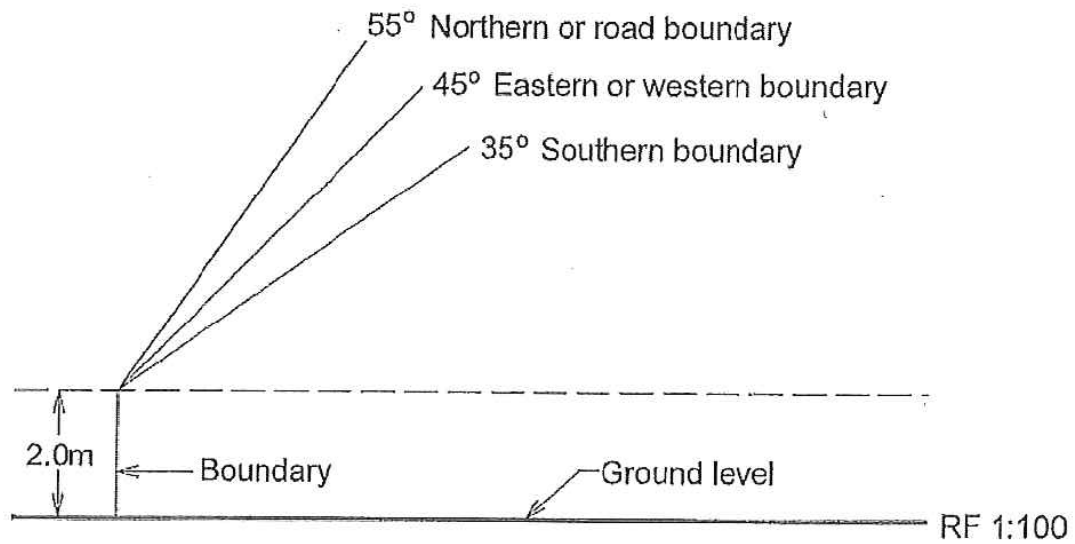
- a) Any internal building works other than those that result in a net increase in the number of classrooms or classroom equivalents;
- b) General building maintenance and repair work including but not limited to re-painting, re-cladding and re-roofing;
- c) Installing, modifying and removing playground furniture and sports structures (e.g. goal posts);
- d) Amending any internal pedestrian circulation routes/pathways;
- e) Installing, maintaining or repairing any in ground infrastructure services such as stormwater, sewerage and water lines and connections, including any ancillary earthworks;

- f) Provision of landscaping and gardens, provided that it does not conflict with any designation condition or alter landscaping required as mitigation as part of an outline plan for other works; or
- g) General site maintenance and repair work, or boundary fencing otherwise permitted by the Unitary Plan.

Recession Plane Indicator



Recession Plan Cross Section



Appendix F

Certificate of Title



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R.W. Muir
Registrar-General
of Land

Identifier 871531
Land Registration District North Auckland
Date Issued 08 January 2019

Prior References
GN D455102.2

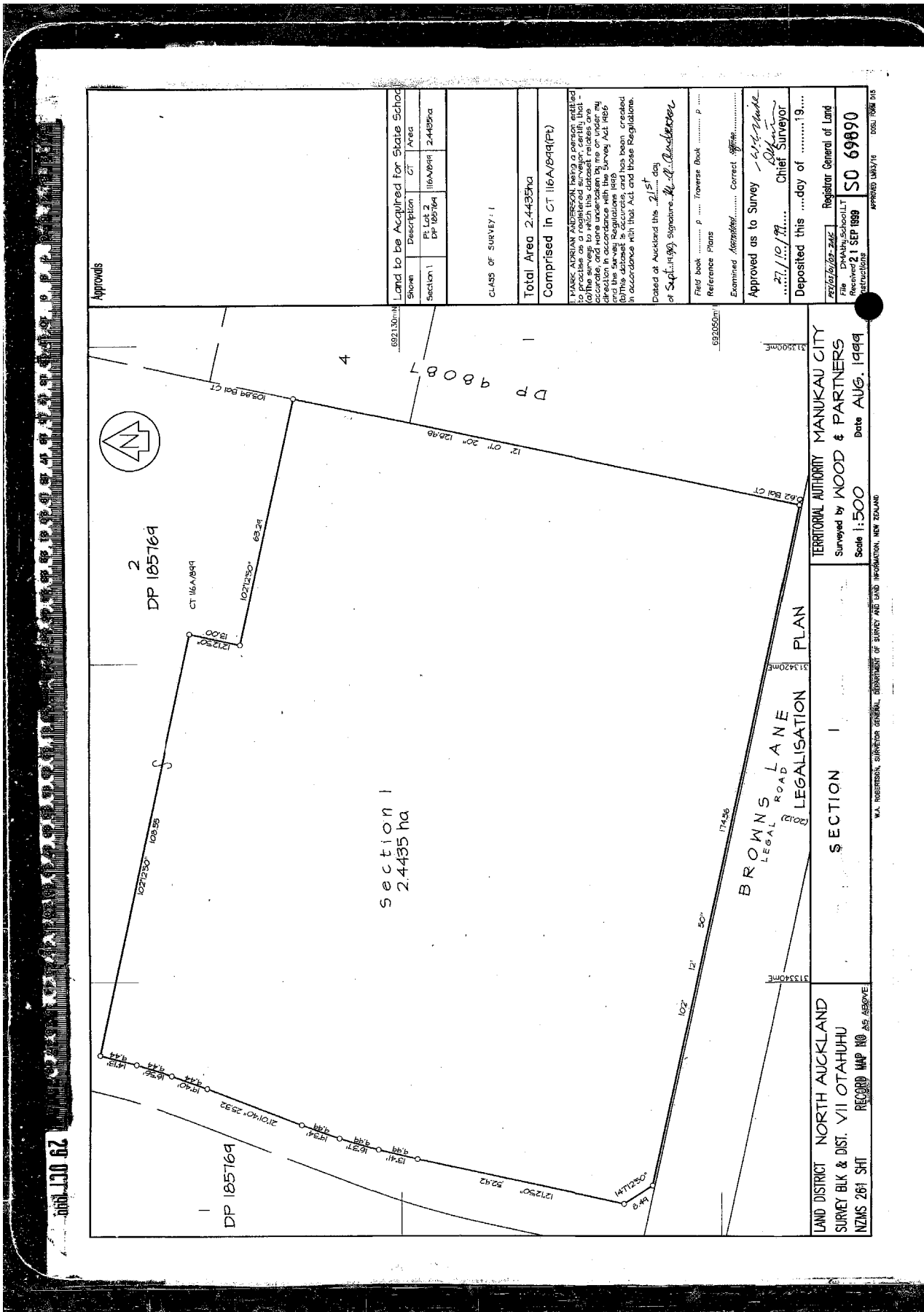
Estate Fee Simple
Area 2.4435 hectares more or less
Legal Description Section 1 Survey Office Plan 69890
Purpose State School

Registered Owners
Her Majesty the Queen

Interests

11327816.2 Certificate under section 148 of the Nga Mana Whenua o Tamaki Makaurau Collective Redress Act 2014 that the within land is RFR land as defined in section 118 and is subject to Subpart 1 of Part 4 of the Act (which restricts disposal, including leasing of the land) - 8.1.2019 at 4:31 pm

Subject to a right (in gross) to convey electricity over part marked A on DP 537711 in favour of Vector Limited created by Easement Instrument 11545523.1 - 19.9.2019 at 3:34 pm



From: [Chris Horne](#)
To: [Vanessa Leddra](#)
Cc: [Jason Ashby](#); [Emma Howie](#)
Subject: Willowbank School Alteration of Designation
Date: Tuesday, 25 January 2022 4:49:55 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)

Dear Vanessa

It has come to our attention that there are two minor typographical errors in the lodged documents:

The proposed conditions included in the Form 18 and AEE refer to the Integrated Transport Assessment (ITA) from Abley dated 12 November 2021 which should in fact refer to the ITA dated 10 Jan 2022.



Further, the 6th bullet point in section 7.3 of the AEE transportation effects (p20) incorrectly refers to a customised parking ratio of 1.75 car parks per two classrooms, which should in fact refer to 2 car parks per classroom to match proposed condition 1.

Please accept his email as a formal modification to the lodged notice of requirement documents accordingly to correct those errors.

Regards

Chris Horne
Director



PO Box 3082
Auckland 1140
Phone 09 369 1465
Mobile 0274 794 980

chris@incite.co.nz
www.incite.co.nz

This e-mail and any attachment(s) contains information that is both confidential and possibly legally privileged. No reader may make use of its content unless use is approved by Incite.

Email from MoE dated 18 January 2022
Hi Vanessa,

The tables below provides current staff numbers and a projection of the staff numbers for Willowbank school in response your query. The projected numbers are based on a school roll of 900 students which the masterplan has been designed to. These projected numbers represent one possible scenario of teacher and staff numbers which is subject to change based on the schools requirements as the roll grows over time.

Current Staff Numbers (end 2021)

FT Teachers	32
FT Snr Leadership teachers	6
Part Time teachers	10
Support staff	19
Total	67 / 62 FTE

Projected Staff Numbers (based roll of 900 students)

FT Teachers	38
FT Snr Leadership teachers	7
Part Time teachers	12
Support staff	23
Total	80 staff / 74 FTE

The actual number of carparks provided at each stage of development of the school will be assessed in accordance with condition 1 which is based on the number of classrooms, and if a lesser ratio is proposed this will be supported by a parking study.

As noted in our section 92 response, the stacked parking is a school operational issue and will be managed by the school office to ensure optimal use of the carparks by staff. Additionally, in response to Auckland Transport's recommendation we have included a condition relating to the management of stacked parking in the Transport Assessment that is submitted with each outline plan of works (condition 2).

Ngā mihi

Emma Howie | Planning Manager – Natural & Built Environments
Te Puna Hanganga, Matihiko | Infrastructure & Digital

DDI +6496380264 | Mobile +64272187684

ATTACHMENT 2

SECTION 92 REQUESTS AND RESPONSES

ATTACHMENT 2

SECTION 92 REQUESTS AND RESPONSES

09 December 2021

Chris Horne Incite

By email Chris@incite.co.nz

Dear Chris

Request for further information in accordance with section 92 of the Resource Management Act 1991

Notice of requirement:

Ministry of Education – alteration to designation # 5007, Willowbank Primary School 56 Middlefield Drive Flat Bush – relating to conditions on car parking and school roll cap

I am writing with respect to the notice of requirement described above.

After completing a preliminary assessment of the notice of requirement documents, it is considered that further information is required to enable an adequate analysis of the proposal, its effects on the environment and the way in which any adverse effects on the environment may be mitigated.

The information requested below will enable the council to undertake a full and proper assessment of the notice of requirement and provide a recommendation on it.

Under section 92 of the Resource Management Act 1991, in association with Council's transport consultant, I request the following further information:

Traffic/Transport

1. The Transport Assessment [TA] assessed the effects of an expansion of the roll to 1000 students; however, the proposed alteration seeks to delete the existing cap rather than amending it to 1000 students. Please provide additional information on how the roll could be limited to 1000 students or provide an assessment of the effects from a greater roll.
2. The TA describes the loading situation noting that the "loading arrangement will remain the same for the future stages of school expansion". The northern part of the school, where it appears all truck movements currently occur, is expected to have significant change in future. Please provide details of the truck and other servicing traffic arrangements and movements for the existing and proposed site layouts, including how truck turning and reversing movements are proposed to be accommodated.
3. Please provide a map showing the physical extents of the survey areas A to J noted in the appendix to the TA.

4. During Mr Edwards' visit to the area on the afternoon of 19 November he observed school-related on-street pick-up parking in streets not included in the TA survey, including Rialto Court and Thornberry Crescent. Please expand the physical extent of the on-street parking survey to include a wider area, including at least those streets identified above, to ensure that all areas used for pick-up and drop-off parking are measured. Note – it may be beneficial to provide a better understanding of the on-street parking situation if the surveys covered a longer period before and after school to cover the increase and decrease in parking demand.

5. The recommendations for the supply of on-site parking are dependent upon observations of parking demand during two short periods on one day. Please provide data to demonstrate that the maximum demand for on-site parking occurs during the times surveyed, and/ or provide additional survey data from other times of day.

Advice Note: The strength of the parking supply recommendation would be improved by providing survey data from additional days. Ideally this would include a winter period with poorer weather when people may be less likely to use active modes or public transport.

6. The TA is recommending the pedestrian crossing on Middlefield Drive is relocated approximately 55m to the south (with the form and location to be determined in consultation with Auckland Transport). Please provide details on the impact this change would have on the supply of on-street parking spaces, and how the relocation of the crossing may impact on other road users including people accessing the childcare centre located close to the existing crossing.

7. A new pedestrian access point to the school is proposed near the relocated pedestrian crossing on Middlefield Drive. Please demonstrate there is sufficient space to accommodate a pedestrian gate and a stair between the site boundary and the footpath along the edge of the PUDO area or provide drawings of a revised PUDO area with an updated number of parking spaces that can be provided. *Note – this may be able to be provided at Outline Plan stage?*

8. The TA assessment estimates the number of staff based on 1 staff member per 20 pupils which is not considered to be an adequate basis for assessment. Please provide current staff numbers for the school including the total number, the full-time equivalency, and the maximum number of staff and other personnel present at any one time (approximate maximum during a typical week), and how this is expected to change with any future increase in the roll.

9. The TA assessment of on-site PUDO parking is based on several assumptions that are said to be based on previous surveys. Please provide details to support the assumption of average 39s dwell-time during the peak 20-minute period in the morning, and the assumption that 30% of vehicular traffic would not use the PUDO area due to an adult escorting a younger child to their classroom.

Advice Note: based on the TA analysis, the current roll of 809 students could be serviced by 6 PUDO spaces in the morning. This is not consistent with the observed on-street parking demand (with the PUDO closed) of at least 35 cars during the morning peak period (and over 110 cars in the afternoon peak period).

10. To allow a better understanding of the future transport situation for residents and others please provide a map showing the estimated extents of on-street parking during the afternoon pick-up period in future allowing for areas where parking is not permitted.

I have also received a preliminary response from Auckland Transport, [Jason Ashby]. AT also have the view that further information is required to enable an adequate analysis of the proposal, its effects and potential mitigation. [Note that AT had not received input from the Community Transport Team who deal with the existing travel plan and its effectiveness, at the time of writing]. AT's email is attached for ease of reference.

From AT's point of view, the two main areas lacking in information are active modes and public transport and intersections along with some miscellaneous matters.

Note that some of AT's requests overlap with Mr Edwards' request, however I have included them for completeness.

Note too, that AT is willing to work through the matters raised in their request and is happy for you to contact them for further discussions now that they have had a chance to review the NoR.

Theoretically you should provide this information within 15 working days of the date of this email. However, given Council's closure over the holiday season [Council closes on Thursday 23rd December, and re-opens on 10 January] I am happy for this to be more flexible. Please let me know about potential timeframes in due course.

In accordance with the Resource Management Act, processing of your notice of requirement will remain on hold, pending your response to this request. Please note that the processing clock will stop as this is the first request for additional information.

If you have any queries regarding the above, please contact me on 021 823 685 or by email.



Vanessa Leddra

Policy Planner

Central / South

Plans and Places

Note that the response to the s92 request resulted in a full set of resubmitted lodged [application] documents to be read in conjunction with two emails, one a minor clarification [email dated 25 January from Chris Horne] and confirmation of numbers [email from MoE dated 18 January 2022]

ATTACHMENT 3
SPECIALIST REVIEW



Alteration to Designation 5007

Willowbank School, 56 Middlefield Drive, Flat Bush

Technical Specialist Report - Transport

Alteration to Designation 5007
Willowbank School, 56 Middlefield Drive, Flat Bush
Technical Specialist Report- Transport

for
Auckland Council



Prepared for Auckland Council by

Wes Edwards
Chartered Professional Engineer,
NZCE, BE, FEngNZ, CMEngNZ, MITE, IntPE(NZ)
Director | Transportation Advisor

Arrive Limited

 16 Whiting Grove
West Harbour
Auckland 0618
New Zealand
 +64 9 416-3334
 info@arrive.nz
 arrive.nz

File Ref: 101162
Issue: A 27/04/2022

1 Introduction

Auckland Council has received a Notice of Requirement [**NoR**] to change the Auckland Unitary Plan – Operative in Part [**AUP**] to alter Designation 5007 at Willowbank School, 56 Middlefield Drive, Flat Bush.

Auckland Council has asked Arrive to review the transport aspects of the alteration to assist the reporting planner in preparing the s42A report and assist the hearings panel in deciding on the request.

This report has been prepared by Wes Edwards, Transportation Advisor and Director of Arrive Ltd, a specialist traffic and transport consulting practice. A summary Curriculum Vitae is appended. Wes began his engineering career at the Hamilton Education Board (1984-88) and has provided transport advice to several schools.

In writing this report, I have reviewed the following documents:

- Notice of Requirement and Assessment of Environmental Effects [**AEE**]
- Appendix B School Master Plan
- Appendix C Transport Assessment [**TA**]
- Submissions relating to transport

1.1 Effect of Covid19 Health Orders

This report has been prepared while Auckland is subject to Health Orders that have significantly changed activity and transport patterns in the region. While I have been able to visit the site and the area, I have not been able to observe the operation of the local transport environment under normal conditions (no Health Orders) prior to preparing this report.

I have relied to a significant extent on the observations of the traffic network on Tuesday 8 December 2020 described in the TA. When those observations were undertaken Auckland was subject to Health Orders and at Alert Level 1 when most children had returned to school, and businesses and workplaces were operating, although many people were still working from home at least part of the week, some primary school children were still learning at home, and some tertiary education was being undertaken remotely.

Waka Kotahi New Zealand Transport Agency has been undertaking research on the impact of the Covid-19 Health Orders on transport with the most relevant fieldwork being undertaken 12-15th November 2020. That research¹ reports that journeys to work were increasing to 4% below pre-lockdown levels, other essential journeys such as taking children to school were at pre-lockdown levels, and non-essential journeys were still significantly below pre-lockdown levels.

Willowbank School was operating with parents and caregivers not able to enter the school grounds, including the vehicular pick-up and drop-off area.

For those reasons the observations and traffic conditions described in the TA are likely to represent fewer vehicle movements on the road network than would have occurred in the absence of the Health Orders and altered operation of the school facilities.

This report is undertaken with the expectation that traffic conditions will return to normalcy in the short to medium term, and that any long-term or permanent effects on travel behaviour would have a relatively minor impact on congestion.

¹ Covid-19 tracking core report – Wave 23. New Zealand Transport Agency, 17 November 2020.

1.2 Key Transport Issues

The key transport issues for this notice are:

1. The ability for pedestrians and vehicles to safely access the site
2. The proposed provisions for parking of vehicles within the site
3. Effects on the transport environment from additional traffic movements and parking demand.
4. The provision of measures or controls to address any effects.

2 Context

2.1 Primary School Operation

2.1.1 School roll, classrooms, and teaching spaces

The Auckland Unitary Plan contains a set of conditions that apply to all Minister of Education designations in Auckland except where a designation-specific condition overrides a standard condition. Those standard conditions include a condition requiring a minimum number of parking spaces to be provided, which is based on the number of “classroom or classroom equivalents.”

Some of the notified material uses the term “teaching space,” and I have taken this to be a classroom equivalent.

My understanding is public schools are required to accept any school-aged child resident in their zone, so have little control over the size of the school roll, other than acceptance of out-of-zone enrolments. I understand schools are funded for teaching staff according to the school roll and both the roll and the number of staff can fluctuate throughout the school year.

The number of teaching spaces is not able to respond as quickly, so schools in high growth areas may need to place more than one teacher and “class” of students into one teaching space. Coupled with the ability for one physical “classroom” building to have more than one teaching space, it is not unheard of for one building with two teaching spaces to accommodate four teachers and more than eighty children in a school under growth pressure.

This report assesses the likely impacts of the alteration based on the school roll rather than the number of physical teaching spaces, but as noted above there is little to no ability to control the school roll, aside from establishing a new school, and the number of physical classrooms is an easier metric for Council to monitor. For that reason, it is more efficient to base conditions on physical things that are controllable, such as the number of teaching spaces, even though there may be limited control on the number of children or teachers in each teaching space, and the effects are therefore less tightly controlled by conditions.

2.1.2 Travel to and from school

The most popular means of travel to and from school is typically as a car passenger, usually followed by walking. At some schools, a modest proportion of students may use a scooter to travel to school on the footpath, but in some cases part of the scooter journey is still made by car. Cycling to school is typically little-used, and this is understood to be partly due to risk of injury (perceived or real) in conjunction with most primary-aged children not having the developmental skills to safely cycle to school. For that reason, many schools do not actively encourage their students to cycle to and from school, although some encourage scooter use.

As reported in the TA, the 2020 Willowbank school travel survey results are summarised in the following table.

Table 1: Willowbank school travel survey 2020

Mode	To School	From School
Walk / Scooter	26%	33%
Bicycle	0.1%	0.1%
Car at school	52%	49%
Car within 400m of school	21%	17%
Total by Car	73%	66%

The school website contains information about the Walking School Bus programme intended to support and encourage the use of walking to and from school.

2.2 Designation 5007

Designation 5007 of the AUP has the purpose of “Educational purposes - primary school (years 0 - 8) and may include early childhood education (preschool)”.

The designation is subject to the standard conditions for all Minister of Education designations, and one additional condition:

“The school will have a maximum roll of 540 pupils provided that the roll will be able to exceed 540 pupils up to a maximum of 700 pupils for a period not exceeding three years”

The standard conditions include minimum parking requirements for any increase in classrooms or early-childhood capacity.

2.3 Existing School

Willowbank School has been operating on the site for several years. At the end of 2020, the school had 32 teaching spaces, a total of 67 staff (62 full-time equivalents [FTE]), and a roll of 809 students. Transport features and characteristics of the school are provided in the TA and discussed later in this report.

2.4 Crash History

The TA includes a description of the crash history in the area for the standard five-year period ending in 2020.

There were four crashes at the Gracechurch Drive/ Middlefield Drive roundabout at the southwestern corner of the school site. Three of these crashes involved westbound vehicles on Gracechurch failing to give way to cyclists or motorcyclists resulting in two minor injuries and one serious injury.

There were four crashes where a vehicle hit a parked car, two each on Gracechurch Drive and Middlefield Drive. Both crashes on Gracechurch Drive occurred in the dark in the early hours of the morning, and one resulted in minor injury. Both crashes on Middlefield Drive occurred in the afternoon (3:15pm Monday, and 4:45pm on Saturday).

Data for 2021 is now complete and two crashes occurred. One vehicle hit a traffic island at the roundabout (3:47pm on a weekday) and another vehicle hit a parked car in Middlefield Drive (4:45pm on a weekday). Neither crash involved injury.

The crash record at the roundabout is not unusual, but the record indicates there is a crash problem with vehicles hitting parked cars on Middlefield Drive.

2.5 Public Transport

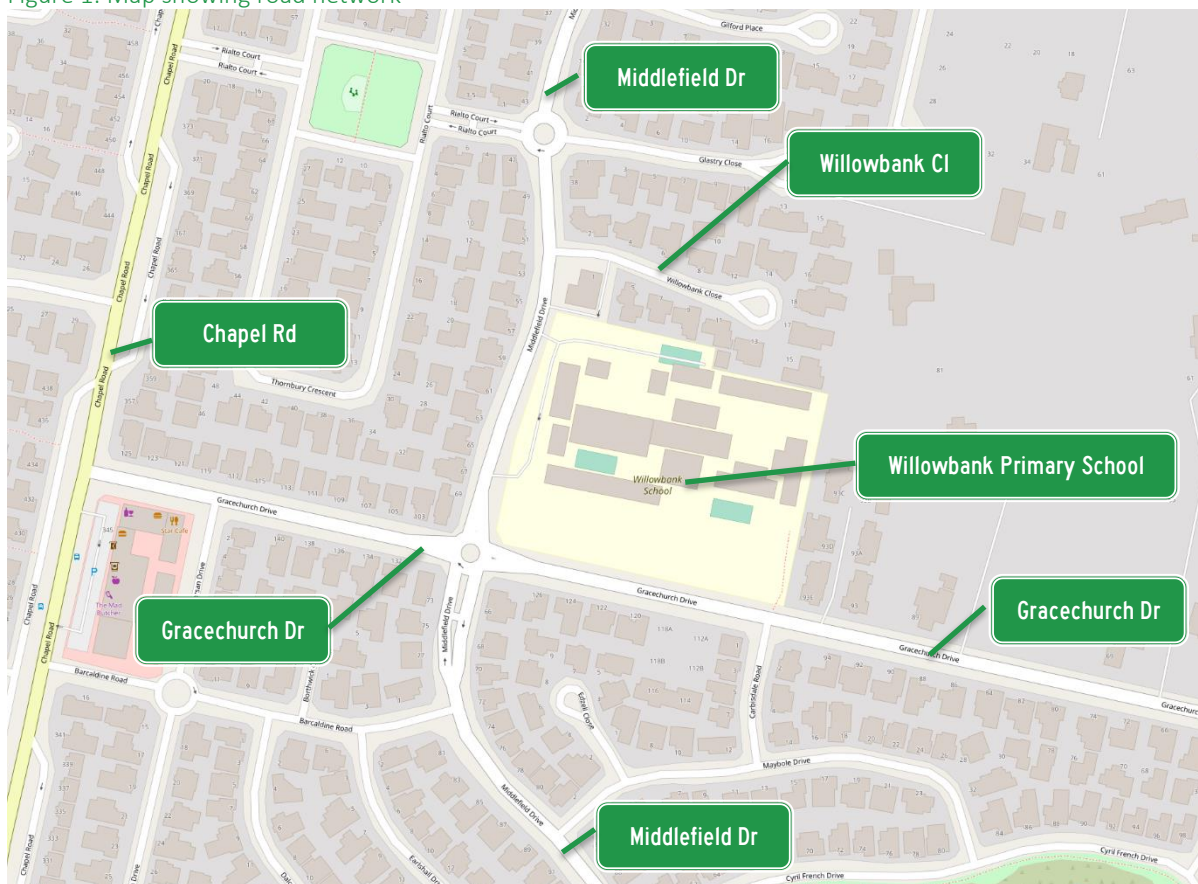
Public transport services are classified as “Rapid” (rail and busway services), “Frequent” (usually on dedicated lanes running at least every 15 minutes), “Connector” (at least every 30 minutes), “Local” and “Peak Only”.

As noted in the TA, a Frequent service (35 Botany - Manukau) and a Local Service (739 Maraetai – Botany) travel along Chapel Road with a stop around 300m from the site. A Connector service (355 Botany - Manukau) passes through the roundabout.

As a guide to accessibility the walkscore.com website gives the site a WalkScore of 63% “Somewhat Walkable” as some errands can be accomplished on foot, and a TransitScore of 37% “Some Transit”.

2.6 Road Network

Figure 1: Map showing road network



All roads in the vicinity of the school have a 50km/hr speed limit except Chapel Road which has a 60km/hr limit. There is no 40km/h school zone around Willowbank School. Traffic count data from Auckland Transport’s database is summarised in the following table.

Table 2: Traffic counts

Road	Location	Date	Avg Weekday	AM Peak Hr	Midday Hr	PM Peak Hr
Middlefield Dr	North of Gracechurch	Dec 2019	5,570	659	407	583
Gracechurch Dr	West of Middlefield	Dec 2019	3,923	425	290	369
	East of Baverton	Mar 2021	5,004	708	370	520
Chapel Rd	South of Cyril French	Mar 2019	4,454	564	313	480
		Jun 2021	19,152	1528	1603	2017
		Mar 2019	18,801	1611	1511	1754

2.6.1 Middlefield Drive

Middlefield Drive is a One Network Road Classification [ONRC] Primary Collector and carries around 5,500 v/d. Along the school frontage the carriageway is 7.3m wide and parking is prohibited on the eastern (school) side of the road. A width of 7.3m is only just sufficient for two cars to pass by a car parked at the kerbside with the small remaining clearances requiring drivers to slow, particularly where a car is poorly parked, or one vehicle is wide. While parking has been prohibited on the eastern side of the road the centreline remains in the centre of the road. It is recommended that Auckland Transport consider relocating the marked centreline to be in the centre of the carriageway allowing for cars to be parked on the western kerb.

2.6.2 Gracechurch Drive

Gracechurch Drive is a of Primary Collector that carries around 5000 v/d. The street has a carriageway 10.8m wide providing for one movement lane in each direction and parallel kerbside parking on both sides of the street.

2.6.3 Gracechurch Dr/ Middlefield Dr Intersection

This intersection is controlled by a roundabout, and from the data presented in the TA currently operates at a satisfactory level of service in the before-school and after-school periods.

3 Proposed Alteration

The Minister of Education proposes to remove the designation condition limiting the school roll and proposes to modify the purpose removing reference to Early Childhood Education. New conditions are proposed to provide a site-specific parking requirement, a site-specific transport assessment requirement for additional classrooms, and to require a school travel plan.

3.1 Early Childhood Education

An Early Childhood Education (ECE) centre is currently operating on a site abutting the school's northern boundary. The removal of the ECE from the purpose of the designation would not have any material transport-related effect.

3.2 School Roll Limitation

The removal of the limitation on the school roll would legitimise the current school roll and allow for further expansion of the school roll. An increase in the roll would increase the trip generation of the school and the demand for parking. These matters are addressed below.

3.3 Parking

3.3.1 Existing Parking Supply

The school currently has sixty-three parking spaces on the site. There are forty-eight standard and two mobility spaces in the staff parking area located along the northern boundary of the school, and 13 spaces in the area along the Middlefield Drive frontage including 7 PUDO spaces, 4 staff spaces, 1 visitor space, and 1 space used by the school van. The current standard MoE minimum parking condition would result in a minimum requirement of 64 spaces.

3.3.2 Proposed Condition

The differences between the standard condition and the proposed condition are shown below with ~~deletions~~ and **additions**.

1. On-Site Car Parking – School

On-site car parking shall be provided at a rate of 2 car parks for every classroom or classroom equivalent, except where the Council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer and/or transportation planner, that a lesser level is appropriate. *For the avoidance of doubt, this condition shall only apply where there is a net increase in the number of classrooms or classroom equivalents.* **Car parking required by this condition shall include parallel car parking spaces in the pick-up and drop off area (PUDO), and any stacked car parks.**

The removal of the “avoidance of doubt” sentence may result in the condition capturing any existing shortfall in parking supply. The TA notes that the school currently has insufficient parking to comply with the condition (a shortfall of 1 parking space) and recommends that be addressed as part of any new building project. I support that recommendation.

The primary reason for the site-specific condition is to clarify that PUDO spaces can be included, and that the use of stacked parking be permitted.

As worded, the condition could be interpreted as requiring the use of parallel PUDO spaces and stacked parking spaces. If the condition is to be confirmed, I would recommend the wording be amended to allow for any parallel or stacked parking to be included in the minimum required supply. Recommended changes to the conditions are appended.

3.3.3 Parking Demand at Primary Schools

The TA provides the results of a parking survey undertaken at Willowbank School on Tuesday 8 December 2020 at the beginning and end of the school day. All PUDO activity was on-street during the survey. On that day the parking demand was as summarised in the following table.

Table 3: Willowbank School parking demand on 8 December 2020

	Before School	After School
Cars	113	182
Peak Time	8:40 am	3:01 pm
Cars per student	0.14	0.22
Cars per classroom	3.53	5.69
Cars per FTE staff member	1.82	2.94

Based on 809 students enrolled on 8 Dec 2020, 62 FTE staff at end of 2021, and 32 classrooms.

The parking survey by drone was likely to have captured most or all the parking demand generated by vehicles dropping-off and pick-up children outside the school but would not have captured parking demand generated by vehicles dropping-off or picking up children that walk for part of their journey as that parking demand would occur further from the school. That is likely to be true for most or all parking surveys undertaken at other schools, and such parking would typically generate few effects as it would usually be spread over a wider area.

There is little published information on the parking demand at primary schools in New Zealand, with sites surveyed from 1994 to 2007 contained in the Trips Database Bureau data summarised in the following table. Compared with the other sites in the database the Willowbank School survey shows a similar parking demand per student and per classroom to St Martins Primary in Christchurch.

Table 4: Parking demand at other primary schools in New Zealand [TDB]

School	Pupils	Staff	Classrooms	Cars	Cars / Pupil	Cars / Employee	Cars/ Classroom
St Martins, Chch, 2000	610	44	28	154	0.25	3.5	5.5
Waimataitai School, Timaru, 2007	450	35	19	28	0.06	0.8	1.5

Based on that information, a New Zealand Transport Agency [NZTA] publication² recommends:

² Trips and parking related to land use. New Zealand Transport Agency research report 453, November 2011, Wellington. Pg 78

For a primary school of, say, 300 pupils and 12 classrooms (typically 600m²) there will be a need for 20 parking spaces on-site for staff and site visitors. There will also be a need for 'set-down' space (either onsite or at the street kerbside) for 60 cars at the morning arrival and afternoon departure times. The section of street serving the school will be subject to a peak morning and mid-afternoon traffic generation of 180vph (two-way).

... few sites have sufficient area to handle such peak flows and parking needs off-street. Where schools are located on minor streets this situation may be acceptable, but where they front arterial roads sometimes the situation is intolerable and corrective action to provide off-street parking and set-down areas may be necessary.

Scaling the NZTA recommendations to the existing roll of 809 students would result in a recommendation for 54 on-site spaces for staff and visitors, plus 'set down' space for 162 cars, a total of 216 cars. This is 19% higher than the demand of 182 spaces recorded during the December 2020 survey. The difference might be attributable to several possible factors including the effect of the Health Orders including lower student attendance, different travel behaviours, and daily or seasonal variation.

In the before-school period much of the drop-off traffic has a short duration of stay as only younger children tend to be accompanied to the school gate or classroom. In the after-school period it is common for cars to be parked near the school for some time prior to the end of the school day. In locations where the parking supply is poorer cars often arrive a considerable time prior to the end of the school day to obtain a parking space close to the school.

Typical minimum parking requirements for schools are for on-site spaces used by staff and visitors, with most or all the before-school and after-school pick-up and drop-off parking occurring on surrounding streets. Where on-site pick-up and drop-off facilities are provided these tend to cater for a small proportion of the pick-up and drop-off parking demand. For that reason, providing for any on-site PUDO spaces to be included in the minimum parking requirement provides a greater risk of their being insufficient on-site parking for staff and visitors, and this could increase the demand for on-street parking for longer periods of the day.

A multi-stage masterplan has been prepared showing how the school may be developed to accommodate a roll of nine hundred students. Stage 1 involves the establishment of two new teaching spaces and a nominal roll of 850 students, and the Stage 2 plan includes an additional four teaching spaces, taking the total to 38 teaching spaces with a nominal roll of 900 students. Under the proposed condition, for 38 classrooms, a minimum of 76 parking spaces would be required, an increase of 13 spaces. Stages 3a and 3b involve a new hall and replacement teaching spaces, with no increase in the number of teaching spaces or parking requirement.

The masterplan shows the parking supply for staff increasing from 50 spaces now to 56 in Stage 1 and 62 in Stage 2. The supply of PUDO spaces remains the same as existing in both masterplans.

The estimated parking demand at various roll levels are summarised in the following table, assuming that all PUDO spaces are available for PUDO activity before and after school, and the staff areas (existing northern and proposed southern stacked) are available to staff only.

Three "existing" scenarios are assessed, being the current roll limit of 540 students, the temporary (3 year) roll limit of 700 students which I assume has now been in place for more than 3 years, and the 2020 roll of 809 students. Three "proposed" scenarios are assessed, being the Stage 1 Masterplan nominal roll of 850, the Stage 2 Masterplan nominal roll of 900 students, and the roll of 1000 students used in the TA.

If the masterplan were implemented the proposed supply of on-site staff parking would be a reasonably good match to the expected demand for staff parking. Provided the staff parking is well designed it is unlikely there would be any significant demand for on-street parking from staff until the school roll exceeded 900 students.

Table 5: Estimated parking demand and proposed supply

	Existing			Proposed		TA
	Permanent	Temporary	2020 Actual	Masterplan 1	Masterplan 2	
Physical Layout	Existing	Existing	Existing	Stage 1	Stage 2	Stage 2
Student Roll	540	700	809	850*	900*	1000*
Staff Demand	30-36	39-47	45-54	47-57	50-60	56-67
Staff Supply	50	50	50	56	62	62
PUDO Demand	91-108	119-140	137-162	144-170	152-180	169-200
PUDO On-Site Supply	13	13	13**	13	13	13
PUDO On-Street Demand	78-95	106-127	124-149	131-157	139-167	156-187
Change in On-Street Demand	-	+28-32 +35%	+46-54 +58%	+53-62 +67%	+61-72 +77%	+78-92 +98%

* Roll numbers under the proposal are nominal rolls for design and may be exceeded

** Assumes PUDO area re-opened before and after school

If the masterplan were implemented the supply of PUDO spaces would remain static. As a result, all increases in demand for PUDO parking before and after school would need to be accommodated on the street unless the travel behaviours of the school could be substantially modified. This situation would be exacerbated by a loss of on-street parking resulting from the proposed relocation of the pedestrian crossing.

3.3.4 Stacked Parking

The AUP defines stacked parking as where access to a parking space is required through another parking space. The AUP permits stacked parking spaces for dwellings. Any other activity requires consent to provide stacked parking so the effects of the parking arrangements can be considered.

Stacked parking has the potential to create adverse traffic efficiency and safety effects associated with the additional manoeuvring involved. Stacked parking may be less convenient and therefore less attractive resulting in parking demand spilling over onto the adjacent street network where it may lead to traffic safety or efficiency effects, and potential adverse amenity or other effects that are outside the scope of this report.

In my experience Council sometimes provides consent for stacked parking where:

- only one vehicle needs to move to allow access to another space.
- The stacked spaces are used by staff familiar with their use and subject to organisation control
- Pairs of stacked spaces are allocated to staff with the same working hours
- There is a reasonable proportion of non-stacked spaces
- There is sufficient space for the additional movement and waiting of vehicles to occur without compromising the safe and efficient operation of the site

The proposed condition has no limits on the number or proportion of parking spaces that may be stacked, or any control over the arrangement or use of the stacked spaces, although the TA that is proposed to be required would need to take those matters into account. That assessment is discussed below. In principle, the use of stacked parking for school staff should be capable of being managed to avoid significant adverse effects provided the parking area is well designed.

The masterplan that has been provided to illustrate one possible development outcome shows 62 parking spaces in a new parking area located in the south-western corner of the site. Of the 62 spaces, 60 are stacked. If the stacked parking were to be provided in a form like that shown on the masterplan it is likely that there would be more than sufficient space for cars being moved to wait while another vehicle enters or leaves a space; however, the manoeuvring width provided may be insufficient if the parking area is laid out in accordance with the minimum dimensions stated in the AUP.

Many minimum parking dimensions in New Zealand, including in the AUP, are informed by the AS/NZS 2890.1:2004 standard³, which is also the acceptable standard for the New Zealand Building Code. That standard is based on parking spaces 5.4m in length, although the standard provides for the line marking between stalls to be only 5.0m long in New Zealand. Work undertaken in preparation for the revision of this standard has shown that longer vehicles are now more prevalent as many vehicles, such as double-cab utes, are longer than 5.0m. If the stacked parking is designed with 5.0m long spaces the manoeuvring aisle may be insufficient due to longer vehicles. I recommend that any stacked parking area be designed with aisles at least 0.8m wider than the minimum required by the AUP to address the longer vehicles and be consistent with AS/NZS 2890.1.

3.4 Trip Generation

Like parking demand, trip generation of primary schools is proportional to the school roll.

The TA does not provide a measurement of school traffic generation, but does provide the results of the 2020 annual school travel survey that indicates travel by car is the mode used by 73% of students in the mornings and 66% in the afternoons, although approximately one quarter of those students indicated they walked up to 400m between their car and the school.

Based on an assumption of each car carrying 1.4 students on average, the TA estimates the 2020 school roll of 809 students might generate 300 vehicles in the morning and 272 vehicles in the afternoon. Each vehicle would generate an arrival movement and a departure movement, so there would be around 600 movements in the morning and 544 movements in the afternoon. This equates to 0.74 movements per student in the morning and 0.67 movements per student in the afternoon.

This estimate is only for the students that are transported directly to and from the school and does not include students picked up or dropped off up to 400m away. If that traffic is included the number of vehicle movements generated by the school would be in the order of 300 additional movements in each peak period, taking the total trip generation to around 1 vehicle trip per student in each peak period for the wider area.

There is before-school and after-school care available at the school so some of these movements may not occur in the peak hour. These movements typically would not include staff or other visitor travel, which would occur outside the peak before-school and after-school periods.

The NZ TDB database has trip generation surveys with data from four primary school sites in the morning and five sites in the afternoon. That data is summarised below and includes all movements in the peak hour.

Table 6: Peak hour and daily trip generation at other primary schools in New Zealand [TDB]

School	Pupils	Staff	Classrooms	Vehicle Movements per Student		
				Morning	Afternoon	All Day
Hillsborough Primary, 1994	290	21		0.74	0.79	1.63
Henley Primary, Nelson, 1998	480	20		0.63	0.46	
St Martins, Chch, 2000	610	44	28	0.64	0.61	1.25
Wanaka Primary, 2005	330			0.58	0.60	
Waimataitai School, Timaru, 2007	450	35	19		0.26	
Average	432	30		0.65	0.54	1.44

The NZTA research report notes that between the 1970s and the 2000s there was a major shift in student travel from bicycle to car passenger, greatly affecting the need for PUDO space around schools. The report says this trend has been exacerbated since some schools were dezoned, and that there was higher staff parking demand. The report provides typical car occupancy rates of 1.2 pupils per car in the morning and 1.4 in the afternoon, lending support to the assumption in the TA. The report suggests a school of 300 pupils

³ Australian/ New Zealand Standard 2890.1:2004. Parking facilities, Part 1: off-street car parking, Standards Australia, 2004.

and 12 classrooms would have a trip generation of around 180 v/h. That is equivalent to a trip generation rate of 0.6 movements/ student. This would not include remote PUDO traffic.

Using the rate from the NZTA report, a typical school with a roll of 809 students could be expected to generate around 485 vehicle movements per hour, although the rate observed at Hillsborough Primary in the early 1990s would produce up to 640 v/h.

The volumes of 600 and 544v/h estimated in the TA, suggest the trip generation of the school is about 20% higher than the average, in the order of 0.74 and 0.67 v/student for the morning and afternoon.

The following table provides an estimated vehicular trip generation for various roll sizes based on an average of 0.74 v/student, using the same scenarios used for the assessment of parking.

Table 7: Estimated peak-period trip generation, not including traffic stopping away from the school

	Existing			Proposed		
	Permanent	Temporary	2020 Actual	Masterplan 1	Masterplan 2	TA
Student Roll	540	700	809	850*	900*	1000*
PUDO Trip Generation	400	518	599	629	666	740
Change		+118	+199	+229	+266	+340
		+30%	+50%	+57%	+67%	+85%

* Roll numbers under the proposal are nominal rolls for design and may be exceeded

The TA estimates the trip generation for 1000 students at 371 vehicles (743 movements) in the morning and 336 vehicles (672 movements) in the afternoon, which is consistent with my estimates for the traffic picking-up and dropping-off immediately outside the school.

The TA suggests that not all these vehicles would travel through the Gracechurch / Middlefield roundabout, but as there are few turning opportunities in Middlefield Drive, I expect most vehicles would pass through the roundabout in at least one direction.

The TA notes the roundabout currently performs well in the morning and afternoon school peak periods and expects the roundabout to continue operating well with an increased roll. From the information provided that appears to be a reasonable expectation.

3.5 Transport Assessment

Proposed Condition 2 requires a TA that addresses five specific matters to be provided with any Outline Plan that increases the number of classrooms.

2. Transport Assessment

Any outline plan to increase the number of classrooms shall include a TA prepared by a suitably qualified traffic engineer/transportation planner, which, taking into account the TA prepared by Abley dated 10 January 2022, shall address safety, efficiency and the following specific matters:

- the suitability of the design and location of car parking including the management of any stacked parking,
- the suitability of the design and location of loading facilities for rubbish trucks, deliveries and other service vehicles.
- the pick-up and drop-off area including any onsite changes and management approaches to improve safety.
- the access points including measures and treatments to manage conflict between pedestrians, cyclists, scooter users and vehicles
- pedestrian and cycle facilities, including the location of the pedestrian crossing on Middlefield Drive and Kea Crossing on Gracechurch Drive.

The TA shall be prepared in consultation with Auckland Transport and the outcome of that consultation recorded in the outline plan. Any necessary relocation and upgrading of pedestrian crossings, subject to the approval of Auckland Transport, shall be undertaken at the Requiring Authority's expense.

The Minister is required to consult with Auckland Transport, but Auckland Transport need not approve of the plan. There is no scope for public consultation or input into the Outline Plan, so it is important that the condition can address adverse traffic impacts.

While the TA is required to address safety and efficiency, there is no requirement to assess matters outside the scope of a TA, such as residential amenity and convenient access to on-street parking.

As proposed, there is no requirement for the TA to consider the demand for on-street parking of PUDO activities other than the safety of the on-site PUDO area, as the existing standard or proposed condition effectively only provide parking to meet the normal daily parking demand, not the short-lived before-school and after-school peak demand. At present, the scale of the on-street parking demand is intended to be constrained by the limit on the school roll, but the proposal removes that limit and would substantially increase the demand for on-street parking compared to the long-term baseline, a roll of 540 students.

The proposed condition records that any off-site work relating to pedestrian crossings is to be undertaken at the expense of the Minister. There could be other off-site work required because of changes to the access arrangements, perhaps including changes to parking restrictions, so I recommend the condition provide for any such changes to also be at the expense of the Minister.

The proposed condition states a transport assessment is only required for an Outline Plan that involves an increase to the number of classrooms, and that is consistent with standard condition 6.

6. Outline Plans

That an outline plan of works shall not be required for:

- a) Any internal building works other than those that result in a net increase in the number of classrooms or classroom equivalents;*
- b) General building maintenance and repair work including but not limited to re-painting, re-cladding and re-roofing;*
- c) Installing, modifying and removing playground furniture and sports structures (e.g. goal posts);*
- d) Amending any internal pedestrian circulation routes/pathways;*
- e) Installing, maintaining or repairing any in ground infrastructure services such as stormwater, sewerage and water lines and connections, including any ancillary earthworks;*
- f) Provision of landscaping and gardens, provided that it does not conflict with any designation condition or alter landscaping required as mitigation as part of an outline plan for other works; or*
- g) General site maintenance and repair work, or boundary fencing otherwise permitted by the Unitary Plan.*

I understand the standard condition would require an outline plan for physical changes to the layout of the parking or access arrangements, and if that were done without increasing the number of classrooms there could potentially be adverse transport effects generated without an appropriate assessment.

Likewise, if smaller classrooms were replaced with larger classrooms there is the potential for a greater number of students and staff to be accommodated with a corresponding increase in the demand for parking and travel, although that could occur now at any school subject to standard condition 6, including Willowbank School.

It is recommended the proposed condition be changed to also require a transport assessment for any outline plan that includes changes to pedestrian access points, vehicle access and circulation arrangements, or parking arrangements.

3.6 School Travel Plan

The third proposed condition requires the school to develop and maintain a travel plan. The school currently has a travel plan.

3. School Travel Plan

- a) *The Requiring Authority shall either directly or through the School Board of Trustees, continue to have in place a School Travel Plan.*
- b) *The purpose of the School Travel Plan is to provide specifically for measures to reduce vehicle dependence, including walking school buses, carpooling, the encouragement of the use of public transport, the use of remote pick up/drop off locations if appropriate, and the encouragement of walking and cycling. The Travel Plan shall also address the management of pick up and drop off, and onsite parking. This Travel Plan shall also specifically address the following matters:*
 - i. *Safe access to the entry points to the school. Features such as Kea Crossings or Zebra Crossings should be specifically considered;*
 - ii. *Consistency with or use of Auckland Transport's TravelWise programme, or any equivalent programme adopted;*
 - iii. *Measures to separate vehicle entry and pedestrian/cyclist entries;*
 - iv. *Location and provision on site of any scooter and cycle parking required;*
 - v. *Measures to discourage parking over private driveways at adjacent sites in Gracechurch Street and Middlefield Drive;*
 - vi. *Measures to manage the safe operation of pick up and drop off; and*
 - vii. *Measures to manage the operation of any stacked parking onsite so that it is used effectively.*
- c) *The School Travel Plan shall be reviewed and updated as necessary by a suitably qualified and experienced transportation planner at the time of submitting each subsequent Outline Plan of Works relating to increased teaching spaces.*

A school travel plan is a useful tool to help manage the travel and transport aspects of the school operation. As the school already has a travel plan in place, a new or updated plan is unlikely to make any substantial impact on the demand for on-street PUDO parking during the before-school and after-school periods, but new or improved management of PUDO parking could be realised in an updated plan.

4 Transport Assessment

As noted above, proposed condition 2 requires a transport assessment to be prepared taking the assessment provided with the Notice into account.

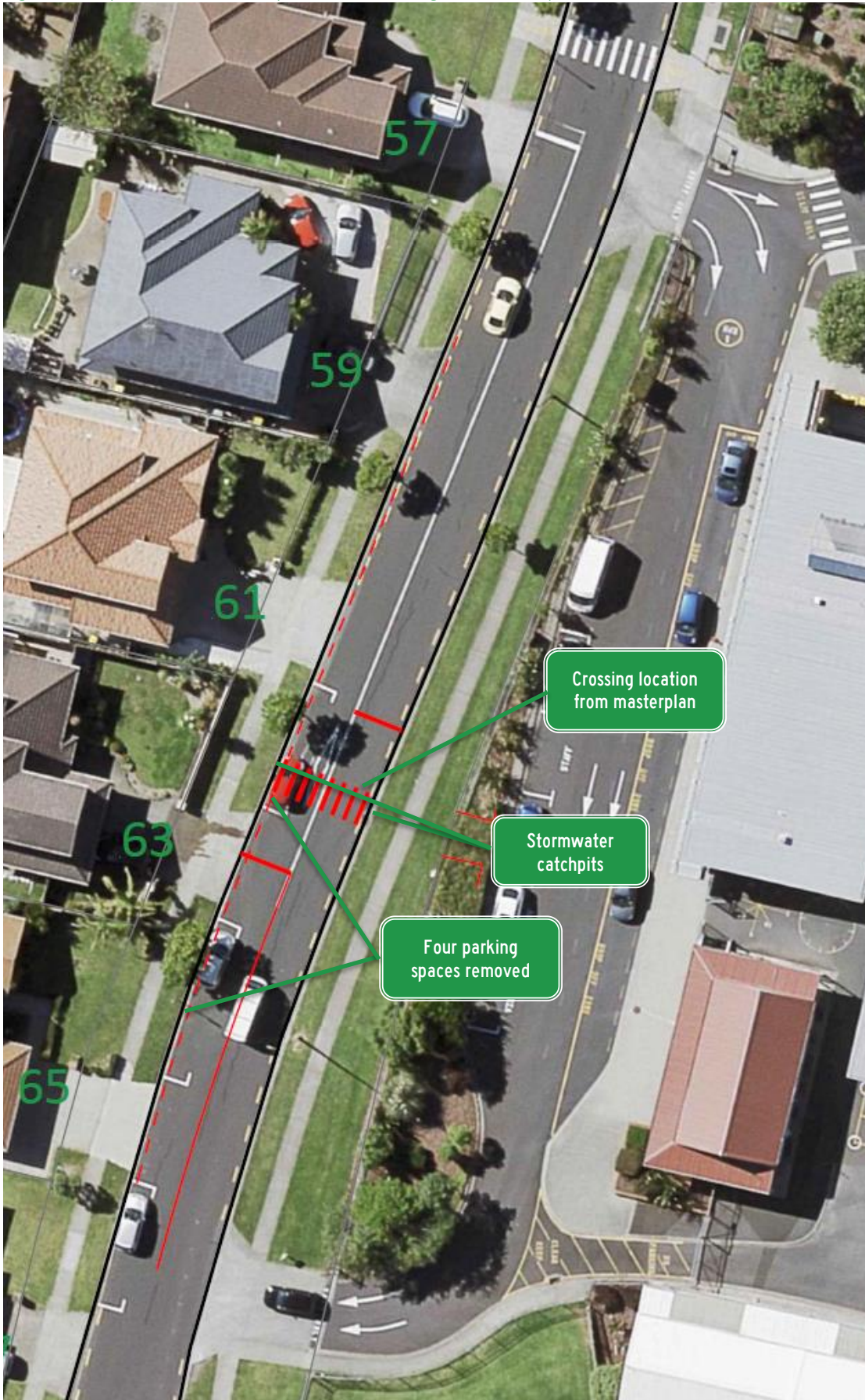
The TA provides some useful data around the current parking and access characteristics of the school, makes several recommendations around possible changes that could be made, referencing a masterplan that could form the basis of future changes to the school, although there is nothing in the proposed conditions that would require the Masterplan to be implemented.

The TA recommendations and the masterplan involve several changes to the school and to pedestrian crossings on Middlefield Dr and Gracechurch Dr.

4.1 PUDO Design

The TA assess some changes to the PUDO area including some on-site changes and relocating the existing zebra pedestrian crossing on Middlefield Drive.

Figure 2: Proposed relocation of pedestrian crossing from masterplan



The zebra crossing is currently located immediately north of the school's northern access. The masterplan indicates the crossing could be moved approximately 60m south. The image above shows the existing arrangement of Middlefield Drive from Council's GIS system and the location of the relocated pedestrian crossing from the masterplan provided with the notice.

The proposed location for the pedestrian crossing conflicts with a stormwater catchpit on each side of the road, so I expect the final location of the relocated pedestrian crossing would be different to that shown on the masterplan. If the crossing is relocated to the general position shown on the masterplan four on-street parking spaces would need to be removed to comply with the minimum requirements for markings at pedestrian crossings⁴. I expect these spaces would not be replaced by removing the parking restrictions near the existing crossing as that would likely cause congestion when cars wait to turn right into the school driveway or the adjacent childcare centre driveway.

5 Submissions

This section addresses transport matters raised in the three submissions that were received.

5.1 #1: Jennifer Long, 63 Middlefield Dr

5.1.1 Relocation of pedestrian crossing

This submitter is concerned that the relocation of the pedestrian crossing would make exiting their driveway more difficult and requests the pedestrian crossing be located as far from their driveway as possible. The submitter states a preference for the pedestrian crossing to be on a raised table and for speed calming measures to be installed in the street to moderate vehicle speed.

As shown on the previous figure, the proposed location for the relocated pedestrian crossing would result in traffic stopped at the crossing queuing across the driveway of #63. It is likely that the crossing would need to be moved a short distance north to avoid stormwater catchpits, but that would result in blockage of the driveway being more complete.

The relocation of the pedestrian crossing is not a certain outcome of the alteration and Auckland Transport could elect to relocate the pedestrian crossing at any time, regardless of any changes to the school or the designation. It is also possible that the form of the crossing could be changed by Auckland Transport according to demand and safety considerations, but I expect this crossing is likely to remain as a zebra (rather than a Kea crossing or a signal-controlled crossing).

The relocation of the pedestrian crossing requires the approval of Auckland Transport as the Road Controlling Authority, irrespective of any condition on the designation. I understand it is Auckland Transport practice to consult with affected parties before making such changes, and to require independent Road Safety Audits of more significant projects.

Research has demonstrated that zebra crossings on raised tables have far better safety performance, and I would expect any relocated crossing to include a raised table unless that were not reasonably practicable for some reason, which might include insufficient space between property driveways.

Speed calming is considered further below.

As the relocation of the pedestrian crossing is not required by the alteration and requires the approval of Auckland Transport, I do not recommend any changes to the designation to address this matter.

⁴ *Manual of Traffic Signs and Markings*, Section 4.02.04. New Zealand Transport Agency, Wellington, Feb 2010.

5.1.2 Additional traffic movements

The submitter is of the view that an increase in the school roll would result in additional traffic movements and additional demand for on-street parking in Middlefield Dr and make it more difficult to enter and exit this and other properties in the street.

I agree that the increased traffic would make it more difficult to enter and exit properties near the school; however, this is experienced for around one hour twice a day on school days which limits the impact of this effect, and I do not consider the adverse effect on exiting driveways to be severe.

5.1.3 Design of carpark

The submitter is of the view that the relocated carpark would have decreased functionality due to the stacked arrangement and questions the rationale of the carpark relocation.

The rationale for the site design is a matter for the Minister of Education. The functionality of the stacked arrangement has been discussed earlier. No further amendments are required.

5.1.4 Relocated pedestrian entrance

The submitter raises safety concerns about the proposed relocation of the central pedestrian entrance.

The Auckland Unitary Plan has no standards that control the location of pedestrian access points, although any effects associated with the relocation could be considered. The Alteration does not require the access to be relocated, and the Ministry could change the access arrangements at any time irrespective of this Alteration. While changes to the pedestrian facilities within the school do not require an outline plan under standard condition 6, it is not clear if a change to an external pedestrian access point would be subject to an outline plan. I do not recommend any amendments to address this issue.

5.1.5 Limited pick-up space

The submitter notes the number of students and staff is not linked to the number of classrooms, there is limited space for children to wait for pick-up and this will be worse with additional students.

It is not clear if the submitter is concerned about space for child pedestrians to wait to be picked up, or space for parents to park vehicles to pick up children, or both.

When I visited the site the gates to the site were closed and no parents were able to enter the school site. Staff supervised groups of children exiting the school through the northern gateway on Middlefield Drive and across the pedestrian crossing.

I would expect that space for child pedestrians to wait could be managed by the school releasing different classes or years of students at separate times, as some schools do. This may not however make any material difference to the demand for pick up parking as parents are likely to arrive well before their child is released, and many parents could wait for longer to pick up children of different ages, offsetting the benefits of parents arriving at a different time. No amendments are required to address waiting space for pedestrians.

5.1.6 Travel survey

The submitter is of the view the survey was not representative as it was taken under Health Orders when parts of the school were closed, staff were not included, and the after-school survey did not capture parking demand that is present from 2pm.

The limitations of the survey due to Health Orders is discussed above. The number of vehicles parked on-site is stated in the survey, and due to how the school was operating it is assumed all vehicles parked on site would be used by staff. Most primary school staff tend to arrive at school well before the before-school peak period and leave well after the after-school peak period, so staff travel makes little contribution to peak traffic flows.

Parents arrive early to pick up children at many primary schools, so it is expected that the school would generate on-street parking demand from 2pm, however, the survey undertaken is likely to have captured the peak of the parking demand in the morning and afternoon.

While the travel survey may not have been fully representative of normal conditions it is still useful for assessing the proposed amendment. As the proposal includes no additional on-site PUDO facilities, the trip generation and demand for on-street parking is likely to double compared with the current roll cap. No action is required to address this concern.

5.1.7 Staff travel

The submitter is of the view staff should be encouraged to use alternate modes of travel instead of being encouraged to use private car travel through supplying additional parking spaces.

The school has a travel plan with the purpose of encouraging reduced car use, and the proposal would require that plan to be kept and updated.

If fewer on-site parking spaces were made available to staff the outcome would be staff parking on the streets surrounding the school. Unlike the PUDO parking, staff parking would be present throughout the school day. As a result, the provision of on-site parking for staff is unlikely to provide any significant benefit in travel reduction and would produce adverse effects on the availability of on-street parking. No amendments are required.

5.1.8 Middlefield Dr width

The submitter disagrees with the notified documents about the ability for cars to pass in Middlefield Dr noting it is “not comfortable” for traffic to pass and relaying their experience of a collision with their car parked on the roadside.

The width of Middlefield Drive and passing vehicles was discussed earlier. Clearances between passing vehicles beside a parked car are reduced, resulting in most drivers needing to slow down to negotiate the street. A large vehicle or a poorly parked vehicle could result in increased difficulty in passing and an increased likelihood of a collision.

An increased school roll would increase the demand for parking and the traffic volume in Middlefield Drive exacerbating this situation.

I recommend that the road centreline be relocated towards the school side of the road to improve the passing of vehicles when cars are parked on the kerbside. That is a matter for Auckland Transport to address, but if the pedestrian crossing is relocated the centreline should be relocated at the same time if it has not been done prior.

5.2 #2 Andrew Dixon, 93C Gracechurch Dr

This submitter is concerned that the increased traffic arising from an increased roll will increase the number of traffic incidents, the traffic survey described in the TA is not representative, and the proposed changes would increase the risk of congestion at nearby intersections.

These matters have been considered above, except for congestion at intersections.

From the material presented in the TA and my own observations the nearby intersections are currently operating well during the before-school and after-school periods, albeit with some minor queuing and delay. While an increase in the school roll would add traffic movements to these intersections, they are expected to continue to operate at levels that are at or better than levels typically adopted as design targets for peak

periods. In other words, the intersections are expected to operate satisfactorily, and no further amendments are required.

5.3 #3 Auckland Transport

The Auckland Transport submission supports the Alteration subject to some amendments.

Auckland Transport has some concerns about the operation of the on-site PUDO area and requests the travel plan condition be amended to require ongoing review of the safe operation of pick up and drop off, and a review of the entire travel plan within six months of any increase in teaching spaces being operational.

Auckland Transport supports the use of walking and cycling, but requests the condition refers to 'active modes' to include other transport options such as scooters.

I support the amendments sought by Auckland Transport subject to additional amendments.

6 Summary and Conclusion

6.1 Summary

The notice proposes several changes to the designation for Willowbank School.

The most significant change is removing the current roll cap of 540 students. It is expected that could result in the roll expanding to 900 students or more. Any increase in the school roll would generate a proportional additional demand for staff parking, pick-up and drop-off [PUDO] parking, and additional vehicle movements. For example, doubling the school roll would double the demand for parking.

The additional vehicle movements are unlikely to be sufficient to cause the nearby intersections to operate poorly; however, the increase in the roll would increase the volume of traffic passing along Middlefield Drive in the before-school and after-school periods. Middlefield Drive is relatively narrow and experiences high levels of parking demand and pedestrian activity during school peak periods, and the increase in both traffic volume and parking demand would generate adverse effects on the safety and efficiency of Middlefield Dr at those times.

The school is currently subject to a standard condition requiring a minimum number of parking spaces to be provided on the school site, and a new site-specific condition is proposed with the same number of spaces but allowing spaces in the on-site PUDO area and stacked parking spaces to be included. The minimum number of parking spaces required is generally sufficient to accommodate staff parking demand. Some changes to the wording of this condition are recommended.

As proposed the alteration does not require any changes to address the increase in demand for PUDO parking, and none are included in the indicative masterplan which may or may not be what is implemented. The proposed relocation of the pedestrian crossing in Middlefield Dr could result in a reduction in the supply of on-street parking. The relocation of the pedestrian crossing is not required or enabled by the alteration, and the location of the relocated crossing is currently uncertain. The crossing relocation is subject to Auckland Transport approval, and I understand Auckland Transport routinely undertake consultation with potentially affected parties for such projects, and I expect that consultation would include the owners and occupiers of adjacent properties.

A condition is proposed to require a transport assessment to be provided with any outline plan that involves an increase in the number of classrooms. As proposed other changes that could have an impact on transport matters would not be required to provide a transport assessment. Some changes to the proposed condition are recommended.

A third condition is proposed to require a school travel plan to be maintained and updated, and some changes to this condition are recommended.

An assessment of effects on residential or other amenity arising from increased travel or parking demand is outside the scope of this report. With respect to the safe and efficient operation of the transport environment, I conclude the alteration as proposed would:

- provide sufficient parking to avoid any significant increase in demand for on-street parking generated by staff.
- Generate a substantial increase (almost double compared with the existing roll cap) in the demand for on-street parking in the before-school and after-school periods.
- Generate a substantial increase (almost double compared with the existing roll cap) in vehicle movements on Gracechurch Drive and Middlefield Drive.

The traffic environment can accommodate increases in parking and travel demand with moderate adverse effects on safety and efficiency, and those effects are moderated by being confined to short periods of the day.

6.2 Potential Mitigation Measures

It may be possible to address some of the adverse effect in Middlefield Drive through changes to the design or operation of the school, or changes to the road network.

It may be possible to stagger the start and finish times for separate groups of children which may reduce the peak parking demand, but parking demands would then occur over a longer period.

It may be possible to increase the supply of parking in Middlefield Drive by widening the eastern side of the road so that cars could park on both sides of the street, however such parking would need to avoid constraining sight lines at the school exit driveway or pedestrian crossing, and parking manoeuvres on both sides of the road could exacerbate congestion in the street. This measure is unlikely to be practical.

As specified in the proposed School Travel Plan condition, it may be possible to identify parking areas remote from the school where pick-up and drop-off operations could occur with reduced effects, with children walking between the school and the remote parking area(s) under supervision.

It may be possible to redesign the layout of the school so that more pedestrian and vehicular activity occurs on the Gracefield Drive frontage rather than the narrower Middlefield Drive frontage. This could potentially include providing a relocated and expanded on-site PUDO area on that frontage; however, the school site is space-constrained, and it is unlikely that such a change would be reasonably practicable.

The only other measure I have identified that could reduce the impact of the alteration on the safe and efficient operation of the street network would be to retain some limit on the school roll; however, that would probably require a new school site elsewhere.

6.3 Conclusion

The alteration would produce adverse effects on the safe and efficient operation of Middlefield Drive in the before-school and after-school periods. During those periods, the adverse effects would be moderate, but as those periods are relatively short in duration the overall effect is relatively minor.

To conclude, I recommend that the alteration be supported. A set of conditions with recommended changes in provided in Appendix B.

Appendix A- Curriculum Vitae

Wes Edwards is Managing Director of Arrive Limited, a specialist traffic engineering and transportation planning practice he founded in 2002. Wes specialises in assessing the transport implications of projects, integrating transport with planning and urban design, and the master-planning and design of residential streets and suburbs, particularly in relation to liveable neighbourhoods, and has participated in providing for over 14,000 new dwellings over the past 12 years.

Wes has 36 years engineering experience with over 30 of those as a traffic specialist in local authorities and independent consulting companies working on a wide range of engagements including, strategic structure plans, plan changes, notices of requirement, residential areas, infrastructure projects, and commercial developments.

Wes has served as an expert witness in mediations, council hearings, arbitrations, tribunals, EPA Board of Inquiry, Environment Court, District Court, and High Court. He has completed the Ministry for the Environment *Making Good Decisions* programme.

Qualifications

- Chartered Professional Engineer
- International Professional (APEC) Engineer
- Bachelor of Engineering (Civil)
- New Zealand Certificate in Engineering (Civil)
- KiwiRail Level Crossing Safety Impact Assessor
- New Zealand Transport Agency Site Traffic Management Specialist

Associations

- Fellow of Engineering New Zealand
- Chartered Member of Engineering New Zealand
- Member of Institute of Transportation Engineers (USA)
- Member of Association of Consulting and Engineering, New Zealand.

Specialisations

- Strategic transportation inputs into structure plans, and plan changes
- Traffic Impact Assessments and Integrated Transportation Assessments
- Street and street network design, particularly for liveable residential neighbourhoods
- Computer modelling of traffic networks and intersections
- Design of infrastructure such as roundabouts, traffic signals, parking areas, and streets
- Analysis of crash data, road safety improvements, road safety audits, crash investigations
- Preparation and presentation of expert evidence in traffic engineering

Experience

Education

Wes commenced his engineering career as a Site Engineer at the Hamilton Education Board which was responsible for school infrastructure in the Waikato, Coromandel, Bay of Plenty, and King Country. Wes has since provided specialist transport advice to multiple public and private schools, in the Auckland Region.

Plan Changes, Masterplans, Structure Plans, District Plans, Notices of Requirement

Wes has participated in master planning of over 14,000 homes plus several retirement villages, town centres, business parks, and industrial developments, for a variety of private and government clients, including

providing advice to Councils with respect to proposed plan changes and subdivision consents. He has also been involved in several notice of requirement processes and in the preparation of district plans.

Project	Client	Scale	Period
PC59 Albany North	Kristin School	Residential and commercial, 13ha	2021-22
AT Designation Lincoln Rd	Auckland Council	Road widening designation	2021
PC61 Waipupuke, Drury West	Auckland Council	Residential and commercial, 56 ha	2020-21
Proposed Waikato District Plan	Landowner	Additional zoning around Pokeno	2020-21
PC43 McLaughlins Quarry	Auckland Council	Industrial, 24.9ha	2020-21
NoR KiwiRail Wiri – Quay Park	Auckland Council	Rail corridor widening designation	2020-21
NoR NZTA SH1 Warkworth*	Landowner	Road widening designation	2019-21
PC45 Clevedon-Kawakawa Rd	Auckland Council	Countryside Living, 9.9 ha	2019-21
PC55 Patumahoe	Auckland Council	Residential, Industrial, 34.5ha	2019-21
PC25 Warkworth North*	Landowner	Residential, business, centre, 99ha	2019-21
NoR NZTA East-West Link*	Submitter	New road designation	2017
Springfield (East Tamaki)	Landowner	5.2ha light industrial	2016-17
SHA Plan Variation, Paerata Rise	Landowner	294ha, 5000 homes, town centre	2013-19
Plan Change Snells Beach	Auckland Council	7.9ha residential	2013-15
Waipa Proposed District Plan	Waipa District Council	Rezoning near Hamilton Airport	2012
NoR NZTA SH1 Whangarei*	Whangarei District Council	Road widening designation	2010-15
Plan Change Hingaia 1b	Landowners	600 homes	2009-11
Plan Change Kingseat Village	Landowners	5000 population village.	2009-11
Subdivision, Waiata Shores	Landowner	500 homes	2011-17
Plan Change Waterside	Landowner	26ha business park	2008-09
Plan Changes Pokeno Village	Landowner	5900 population, 1880 jobs	2007-21
Plan Change Belmont	Landowners	600 homes and school	2007-10
East Urban Lands (Taupo)	Taupo District Council	2000 homes, town centre	2007-09
Plan Change McLennan	Housing New Zealand	450 homes and school	2006-07
Kohimarama Retirement	Landowners	200 retirement units	2006-08
Subdivision Anselmi Ridge	Landowner	500 homes	2005-08
Plan Change Addison	Landowner	1500 homes, town centre.	2005-17
Plan Change Cosgrave	Landowners	800 homes	2004-08
Plan Change Kirikiri	Landowners	500 homes	2004-08
Plan Change Hingaia 1a	Landowners	1300 homes, shopping centre	2003-06

*Environment Court / Land Valuation Tribunal / Board of Inquiry. Proposed changes that are not yet notified are not included.

Appendix B: Recommended Change to Proposed Conditions

In the event the alteration to the designation is confirmed, I recommend the following change to the proposed conditions.

Conditions

The standard conditions for all Minister of Education designations apply to this designation, except that where any standard condition conflicts with a site-specific condition below, the site-specific condition shall take precedence.

1. On-Site Car Parking – School

On-site car parking shall be provided at a rate of 2 car parks for every classroom or classroom equivalent, except where the Council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer ~~and/or~~ transportation planner, that a lesser level is appropriate. ~~Car parking required by this condition shall include parallel car parking spaces in the pick-up and drop off area (PUDO), and any stacked car parks~~ **for the sole use of staff, may be included in the car parking required by this condition.**

2. Transport Assessment

Any outline plan to increase the number of classrooms **or to modify any vehicle access, parking, or vehicle circulation features** shall include a Transport Assessment prepared by a suitably qualified traffic engineer ~~or~~ transportation planner, which, taking into account the Transport Assessment prepared by Abley dated 12 November 2021, shall address safety, efficiency and the following specific matters:

- a) the suitability of the design and location of car parking **on the site** including the management of any stacked parking,
- b) the suitability of the design and location of loading facilities **on the site** for rubbish trucks, deliveries and other service vehicles.
- c) the pick-up and drop-off area including any onsite changes and management approaches to improve safety.
- d) the access points including measures and treatments to manage conflict between pedestrians, cyclists, scooter users and vehicles
- e) pedestrian and cycle facilities, including the location of the pedestrian crossing on Middlefield Drive and Kea Crossing on Gracechurch Drive.
- f) **the impact of any increase in vehicle movements on the safe and efficient operation of the adjacent streets**
- g) **the impact of any increase in demand for on-street parking on the safe and efficient operation of the street network**

The Transport Assessment shall be prepared in consultation with Auckland Transport and the outcome of that consultation recorded in the outline plan. Any necessary relocation and upgrading of pedestrian crossings **or other changes to transport infrastructure**, subject to the approval of Auckland Transport, shall be undertaken at the Requiring Authority's expense.

3. School Travel Plan

- a) The Requiring Authority shall either directly or through the School Board of Trustees, continue to have in place a School Travel Plan.
- b) The purpose of the School Travel Plan is to provide specifically for measures to reduce vehicle dependence, including walking school buses, carpooling, the encouragement of the use of public transport, the use of remote pick up/drop off locations if appropriate, and the encouragement of ~~walking and cycling~~ **active modes of travel**. The Travel Plan shall also address the management of **on-site and on-street** pick up and drop off, and onsite parking. This Travel Plan shall also specifically address the following matters:
 - i. Safe access to the entry points to the school. Features such as Kea Crossings or Zebra Crossings should be specifically considered;
 - ii. Consistency with or use of Auckland Transport’s TravelWise programme, or any equivalent programme adopted;
 - iii. Measures to separate vehicle ~~entry and pedestrian/cyclist entries~~ **active mode movements**;
 - iv. Location and provision on site of any scooter and cycle parking required;
 - v. Measures to discourage parking over private driveways at adjacent sites in Gracechurch Street and Middlefield Drive;
 - vi. Measures to manage the safe operation of pick up and drop off **on the site and on the street including ongoing review of its operation**; and
 - vii. Measures to manage the operation of any stacked parking onsite so that it is used effectively.
- c) The School Travel Plan shall be reviewed and updated as necessary by a suitably qualified and experienced transportation planner at the time of submitting each subsequent Outline Plan of Works relating to increased teaching spaces **or any changes to vehicle access, parking or vehicle circulation features. Within six months of the opening of any such works, the School Travel Plan shall be monitored, and updated if necessary. Any changes to the School Travel Plan shall be developed in consultation with Auckland Transport.**

ATTACHMENT 4
SUBMISSIONS AND LOCAL BOARD VIEWS

Good morning,

I am writing on behalf of my family to address the proposed plans of Willowbank Primary School and the surrounding traffic environment.

We have been residing at 63 Middlefield Drive for over 15 years. My brother and I are also Willowbank School Alumni, so we are all very familiar with the surrounding environment.

The following are concerns or questions that we have regarding the proposal:

- We already experience difficulty exiting our property and into the traffic on Middlefield Drive. On many occasions, we have had to wait at the vehicle crossing for too long before there is an appropriate gap in the traffic, which is not frequent given the number of cars on the road. The relocation of the pedestrian crossing will make this worse as we have to account for pedestrians crossing the road as well.
- Keep in mind that cars will reverse out of the vehicle access of 63 Middlefield Drive, so tracking assessment must be undertaken to demonstrate that reverse manoeuvring will not conflict with the pedestrian crossing.
- We heavily request that the new pedestrian crossing on Middlefield Drive is as far away as possible from the vehicle access of 63 Middlefield Drive.
- What is the point in relocating the playground to the existing carpark, and constructing a new carpark at the existing location of the playground. The carpark surplus is only 6 which seems negligible given the extent of works. The new carpark also have significantly decreased functionality with the double stacked layout.
- If there is a new pedestrian crossing proposed, why not propose a raised speed table. A zebra crossing with just road markings is barely an improvement in accordance to the safe systems assessment framework but a raised zebra crossing will be a notable improvement in that regard, as well as to the safety of pedestrians. We would also prefer speed calming measures as vehicles appear to drive faster than safe/speed limit. I also note that there is a stormwater drain in close proximity to the proposed crossing location but a raised crossing can be accommodated.
- We request updates with the proposal, particularly in regards to the design of the pedestrian crossing on Middlefield Drive.

- Safety concerns regarding the stairs at the central entrance and big groups of children rushing in and out. It doesn't seem appropriate since its proposed to be the main entrance.
- Parents arrive early to pick up in order to secure on-street parking, it is noticeable from 2 pm and even earlier. The parking survey only started at 2:55pm. There is high demand and competition for on-street parking between parents. On many occasions, parents have even entered our property briefly in order to pick up their kids.
- The proposed increase in teachers and students is not reflected in the school resources and classrooms. There have been no significant increase to number of physical class rooms since I attended the school over 10 years ago, leading me to believe that classrooms will be overcrowded. There is undeniable evidence of increasing teacher to student ratios nationwide.

Additionally, the limited space for children to wait to be picked off is identified in the Transport Assessment report, however, this problem was not mitigated and will be worse with more students.

- Staff were not included in the school's travel survey. Staff should also be encouraged to use active modes of transport or public transport, or even carpooling, instead of encouraging the use of cars by supplying additional car parks.
- The parking and drone surveys are not representative as they were undertaken during Covid-19 where parts of the school were closed at that time.
- "Middlefield Drive outside the school has parking in one side of the road only. The road width on Middlefield Drive is wide enough to allow for traffic to flow comfortably in both directions when parking is occupied on one side of the road. This was also observed from the drone surveys." We strongly disagree with this. From first-hand experience over many years, it is not comfortable for traffic to flow in both directions when parking occupies on side. We have experienced the opposite driver not reducing speed or taking any caution on this narrow situation. It makes us very wary of vehicle collisions and far from 'comfortable'. We have also recently experienced a collision with through traffic swiping the side mirror of our car parked on the street.
- Why were we not consulted pre-lodgement? Our property is arguably the most impacted due to the relocation of the pedestrian crossing to our property frontage and deficit of on-street carparking.
- We ask that you ensure our property remains accessible and is not impacted during and after construction.

We appreciate the time taken to read through our concerns and we look forward to hearing back from you.

Kind Regards,
Jennifer Long
jennifer28long@gmail.com

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Andrew Dixon

Organisation name:

Full name of your agent:

Email address: andrew.dixon@xtra.co.nz

Contact phone number: 0274830009

Postal address:
93C Gracechurch Drive
Flat Bush
Auckland 2016

Submission details

Name of requiring authority: Alteration to designation 5007 Willowbank School, 56 Middlefield Drive, Flat Bush

The designation or alteration: Alteration to designation 5007 Willowbank School, 56 Middlefield Drive, Flat Bush

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:
Please refer attached.

I or we seek the following recommendation or decision from Auckland Council:
We request that neighbour consultation is sought prior to the finalisation of any building plan to ensure that multi level buildings are located away from residential boundaries.

Submission date: 24 February 2022

Supporting documents
Willowbank Designation Submission.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

Submission on the Notice of Requirement for an alteration to designation for

5007 Willowbank School, 56 Middlefield Drive, Flat Bush.

We wish to submit on the Notice of Requirement for an alteration to the designation for Willowbank School. We have had correspondence and discussions with Emma Howie and Chris Horne on this matter. The reason for our opposition to the removal of the roll cap has been due to the flow on effects relating to traffic issues and the need for more classrooms (and in particular the proposal to locate multi-level classrooms adjacent to the school boundaries closest to residential neighbours).

Please also refer to our previous submissions and discussions with Emma Howie and Chris Horne, where we have proposed alternative solutions, that would deliver better outcomes for the school, and the neighbours.

Traffic issues

We bought a property near a school so we accept there will be traffic congestion during peak times. We are more concerned that there will be a serious accident given the regularly witnessed driver behaviour and near misses. An increased roll will only increase the traffic incidents.

We note that the Transport Assessment seems to have been based on data collected on one day. We do not believe the Transport Assessment is a true representation of the usual traffic position around the school.

Based on our daily experience, we are not convinced that the proposed traffic plan will improve the traffic situation, but instead risks further congestion on nearby intersections.

Proposed Build Plan

To accommodate the increased roll, build plans have been shared with us. We are concerned at the proposed location of the multi-level classrooms alongside the residential boundaries.

It is clear that impact on neighbours has not been a priority design consideration. There are design alternatives, that will be good for the school, less disruptive, less costly to develop and less impactful for neighbours.

From a personal perspective, the proposed layout will have an impact on our sun, views and property value. In our view multi-level classrooms should not be located on residential boundaries when other options are available.

Thank you for considering our submission. Please feel free to contact us if you require further details.

25 February 2022

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142
Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Alteration to designation 5007 Willowbank School, 56 Middlefield Drive, Flat Bush

Please find attached Auckland Transport's submission on the above Notice of Requirement for the Minister of Education.

If you have any queries in relation to this submission, please contact me at jason.ashby@at.govt.nz or on 021 198 7267.

Yours sincerely,



Jason Ashby
Senior Planner, Land Use Policy and Planning

Submission by Auckland Transport on Alteration to Designation 5007 Willowbank School, 56 Middlefield Drive, Flat Bush

To: Auckland Council
Private Bag 923000
Auckland 1142

Submission on: Alteration to Designation 5007 Willowbank School, 56 Middlefield Drive, Flat Bush

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction:

- 1.1 The Minister of Education ('MoE') has given notice of a requirement ('NOR') for an alteration of designation for 5007 Willowbank School, 56 Middlefield Drive, Flat Bush. The requirement is to remove Special Condition 1 of Designation 5007, removing the reference to the Early Childhood Centre and insert new conditions to enable the Requiring Authority to exceed the current roll cap at Willowbank Primary School and to manage the effects of a larger school roll. This is Auckland Transport's submission on the NOR.
- 1.2 Auckland Transport is a Council-Controlled Organisation of Auckland Council and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'.¹ Auckland Transport is responsible for the planning and funding of most public transport; operating the local roading network; and developing and enhancing the local road, public transport, walking and cycling network. Auckland Transport's submission seeks to ensure that the transport related matters raised by the proposal are appropriately considered and addressed.
- 1.3 MoE has consulted Auckland Transport on the proposal. Auckland Transport sought clarification and amendments which have been taken into account in the preparation of the lodged material. Auckland Transport provided initial high-level feedback on the ITA prepared by Abley, MoE's transport consultants, and the draft Form 18 designation conditions. Auckland Transport recognises that MoE has incorporated changes to the Form 18 designation conditions and accompanying ITA in response to matters raised prior to lodgement of the NOR. Auckland Transport also recognises that subsequent to lodgement agreement has been reached securing amendments to the Form 18 designation conditions that address the concerns raised in this submission. This submission is in support of this proposal and recognises these post-lodgement amendments agreed to by MoE. Auckland Transport is appreciative of the engagement and responsiveness of MoE and their consultants on these matters.
- 1.4 Auckland Transport is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

¹ Local Government (Auckland Council) Act 2009, section 39.

2. Specific parts of the Notice of Requirement that this submission relates to:

2.1 The specific parts of the NOR that this submission relates to are set out in **Attachment 1**. In keeping with Auckland Transport's purpose, the matters raised relate to transport or transport assets and include:

- On-site pick-up and drop-off
- Travel Plan
- Minor wording change

2.2 Auckland Transport acknowledges that school facilities and infrastructure are required to address the regional demands associated with Auckland's growth. Auckland Transport, therefore, supports the NOR, subject to the matters raised in **Attachment 1** being addressed to ensure that any adverse transport effects of the proposal are avoided, remedied or mitigated.

2.3 Auckland Transport continues to be available and willing to work through the matters raised in this submission with the MoE.

3. Recommendation sought:

3.1 The recommendations which Auckland Transport seeks from the Council are set out in **Attachment 1**.

4. Appearance at the hearing:

4.1 Auckland Transport wishes to be heard in support of this submission.

Name: Auckland Transport

Signature:



Christina Robertson
Group Manager, Growth and Urban Planning Integration

Date: 25- February 2022

Contact person: Jason Ashby
Senior Planner

Address for service: Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: 09 4475 417

Email jason.ashby@at.govt.nz

Attachment 1

Issue	Position	Reasons	Recommendation sought from the Council
General overview	Support	<p>The Minister of Education (MoE) is seeking the removal of Special Condition 1 of Designation 5007, deletion of the reference to the Early Childhood Centre and the insertion of new conditions in relation to transportation matters enabling the Requiring Authority to exceed the current roll cap at Willowbank Primary School and to manage the effects of a larger school roll.</p> <p>Auckland Transport supports and recognises the need for this amendment. The alteration to the designation will enable additional school facilities and provide for additional roll growth to support the local community. This additional roll growth will enable access to schooling locally rather than result in additional travel further afield to access primary education.</p> <p>Auckland Transport seeks resolution of the various matters raised in this submission which includes methods to ensure any effects on the transport network are managed in support of the proposal. These matters broadly relate to a range of concerns or issues including but not limited to effects on the transport/road network and road network activities.</p>	<p>Agreement with the proposal to amend the existing designation, subject to any further or other relief, or consequential amendments considered appropriate and necessary to address the matters identified in this submission.</p>
On-site pick up and drop off	Support with amendments	<p>Auckland Transport has raised concerns with MoE over the safe operation of the on-site pick-up and drop-off facility. Auckland Transport is aware that the existing on site pick up and drop off facility has been closed, in part due to covid restrictions, and has remained closed for a period of time at the discretion of the school. Auckland Transport requires that the transport effects associated with pick up and drop off are managed by the school and seeks measures to ensure the safe and ongoing operation of the on-site pick-up and drop-off facilities.</p> <p>Through pre-lodgement engagement with MoE, Auckland Transport has secured amendments to the proposed conditions and ITA supporting the NOR that went some way to addressing the concerns</p>	<p>Retain Condition 2 Transport Assessment, as worded</p> <p>Retain condition 3 with the following amendments.</p> <p>Amend condition 3(b)(vi) as follows:</p> <p><i>vi. Measures to manage the safe operation of pick up and drop off including ongoing review of its operation; and</i></p> <p>Amend condition 3(c) as follows:</p>

Issue	Position	Reasons	Recommendation sought from the Council
		<p>raised. Subsequent to the formal lodgement of the NOR, MoE has agreed further amendments to condition 3 including criterions 3(b)(vi) and 3(c) that satisfy Auckland Transport.</p> <p>Note: requested amendments to condition 3(c) on school travel plan requirements are also addressed below.</p>	<p><i>c) The School Travel Plan shall be reviewed, <u>and updated where necessary</u>, by a suitably qualified and experienced transportation planner at the time of submitting each subsequent Outline Plan of Works relating to increased teaching spaces. <u>Within 6 months of the opening of any additional teaching spaces approved under each Outline Plan of Works, the School Travel Plan shall be monitored, and if necessary updated. Any updates to the School Travel Plan shall be developed in consultation with Auckland Transport.</u></i></p>
School travel plan	Support with amendments	<p>School travel plans can provide an effective tool to complement transport infrastructure and services to support overarching outcomes around mode shift and the safety of all users around schools. School travel plans will outline measures to reduce vehicle dependence, including walking school buses, carpooling and encouraging the use of public transport / active modes of transport.</p> <p>Auckland Transport supports the requirement to have a School Travel Plan in place for this facility with requirements around its subsequent review.</p> <p>Auckland Transport requests the Travel Plan is reviewed at the time of submitting each subsequent Outline Plan of Works relating to increased teaching spaces.</p> <p>Additionally, Auckland Transport requests that within 6 months of the opening of any additional teaching spaces approved under each Outline Plan of Works, the School Travel Plan shall be monitored, and if necessary updated and that any updates to the School Travel Plan shall be developed in consultation with Auckland Transport.</p>	<p>Amend condition 3(c) as follows:</p> <p><i>c) The School Travel Plan shall be reviewed, <u>and updated where necessary</u>, by a suitably qualified and experience transportation planner at the time of submitting each subsequent Outline Plan of Works relating to increased teaching spaces. <u>Within 6 months of the opening of any additional teaching spaces approved under each Outline Plan of Works, the School Travel Plan shall be monitored, and if necessary updated. Any updates to the School Travel Plan shall be developed in consultation with Auckland Transport.</u></i></p>

Issue	Position	Reasons	Recommendation sought from the Council
		As mentioned above, MoE has agreed further amendments to condition 3(c) to address these submission points.	
Active Modes	Support with amendments	Auckland Transport supports the encouragement of walking and cycling as methods to reduce vehicle dependence and recognises that other active modes (e.g. scooters) can also contribute in this regard. Reference to walking and cycling should be replaced with the more encompassing term 'active modes'. MoE have agreed an amendment to 3(b) to address this submission point	Amend Condition 3(b) as follows: <i>(b) The purpose of the School Travel Plan is to provide specifically for measure to reduce vehicle dependence, including walking school buses, carpooling, the encouragement of the use of public transport, the use of remote pick up/drop off locations if appropriate, and the encouragement of walking and cycling active modes.</i>
On-Site Car Parking	Support	Auckland Transport supports the provision and management of on-site car parking necessary to meet the needs of the school and supports the amended condition 1	Retain condition 1. On-Site Car Parking – School as worded in Form 18

ⁱ Willowbank School - Transport Assessment, Abley for Ministry of Education (11th January 2022).

ATTACHMENT 4

HOWICK LOCAL BOARD RESOLUTION 21 APRIL 2022

Please see the below resolution from the Howick Local Board

14 Local board views on a Notice of Requirement for an alteration to an existing designation at Willowbank School, Middlefield Drive, Flat Bush.

Resolution number HW/2022/50

MOVED by Deputy Chairperson J Spiller, seconded by Chairperson A White:

That the Howick Local Board:

- a) with regards to additions to height of school buildings:
 - i. has no objection to two storied buildings provided that:
 - A) Height to boundary rules are observed particularly in relation to neighbouring residential properties; and new buildings are located as far away from these properties as possible.
 - B) Classrooms are double glazed to minimize noise. We note it is reasonable for residents living close to schools to expect some noise before and after school, during breaks; and during outdoor education.
- b) with regards to adding buildings to school property:
 - i. recommends that maximum outdoor space is retained for play and other outdoor activities
- c) with regards to vehicular road safety:
 - i. notes the following points:
 - A) that Willowbank Primary School is located in the centre of an active and growing residential area.
 - B) both Middlefield Road and Gracechurch Drive are well used by motorists travelling in and out of the area. School traffic is seen to impede the flow.
 - C) that a high percentage of Willowbank Primary School students are driven to and from school.
 - D) that a high percentage of children being driven to and picked up from school brings an excessive number of vehicles to the area making it dangerous for pedestrians.
 - E) that the school is poorly located with entry to the administration block located on Middlefield Road - a narrow street which is congested on a daily basis around school start and finish times.
 - F) that entry to the "drive-in drop-off" area, and to staff parking is located almost on top of a school crossing in Middlefield Road. This brings consistent conflict with parents dropping off students; pedestrians crossing the road; school patrollers

seeking visibility; parents wanting to access the school office; parents waiting for children; and other commuters attempting to leave their houses/commute.

G) that drive in/drop off's can often present problems with vehicles blocking the drive-through to drop off or to wait for children; or so that driver can visit the office. This often requires teachers to "man" the area at a time they should be in the classroom. They are also subject to verbal abuse when they ask drivers to move along.

H) queueing to enter the drive in/drop off significantly impedes the traffic flow in Middlefield Rd.

ii) recommends discouraging the practice of children been driven to and from school, by:

A) establishing no drop off/pick up zone within 50 metres of the school.

B) better educating parents; and encouraging parents to use and support walking school buses, and walking to school.

C) promoting walking to school as an integral part of the school culture as "the primary way of getting to and from our school".

d) with regards to pedestrian road safety:

i. notes the importance of well placed, safe and visible pedestrian crossings, as there is a tendency to cross "for convenience" rather than walking to safe supervised crossing points.

ii. recommends assisting pedestrian safety by:

A) ensuring that school crossings are well placed to accommodate main walking routes.

B) installing crossings that are raised and visible, and designing a surrounding area that is open, and well-marked to both eliminate and prohibit stopping or parking on both sides, and will provide broad visibility to road patrollers and students.

C) continued use of walking school buses, and implementation of a roster of parents to walk children from other neighbourhoods - either to school or to where they can join a walking school bus. *NOTE: Often Grandparents or local service club members are often happy to assist in these roles.*

e) recommends the further following points with regards to road safety:

i. that a school speed limit of 40km/h be enforced within 50m of school.

ii. that consideration be giving to making Middlefield Road ONE WAY between Gracechurch Drive and Point View Drive or Heyington Drive.

- iii. that Willowbank Primary School should continue with ongoing education of both pupils and particularly parents, and support this with enforcement input from Auckland Transport and NZ Police.
- f) appoint a local board member to speak to the local board views at a hearing [if one is held] on the Notice of Requirement
- g) delegate authority to the chairperson of Howick Local Board to make a replacement appointment in the event the local board member appointed in resolution b) is unable to attend the private plan change hearing.

CARRIED

ATTACHMENT 5
SITE SPECIFIC CONDITIONS

ATTACHMENT 5 – PROPOSED SITE-SPECIFIC CONDITIONS

Conditions

The standard conditions for all Minister of Education designations apply to this designation, except that where any standard condition conflicts with a site-specific condition below, the site-specific condition shall take precedence.

1. On-Site Car Parking – School

On-site car parking shall be provided at a rate of 2 car parks for every classroom or classroom equivalent, except where the Council accepts, on the basis of a specifically commissioned parking study by an appropriately qualified engineer and/or transportation planner, that a lesser level is appropriate. Car parking required by this condition shall include parallel car parking spaces in the pick-up and drop off area (PUDO), and any stacked car parks for the sole use of staff, may be included in the car parking required by this condition.

2. Transport Assessment

Any outline plan to increase the number of classrooms or to modify any vehicle access, parking, or vehicle circulation features shall include a Transport Assessment prepared by a suitably qualified traffic engineer/ or transportation planner, which, taking into account the Transport Assessment prepared by Abley dated 12 November 2021, shall address safety, efficiency and the following specific matters:

- a) the suitability of the design and location of car parking on the site including the management of any stacked parking,
- b) the suitability of the design and location of loading facilities on the site for rubbish trucks, deliveries and other service vehicles.
- c) the pick-up and drop-off area including any onsite changes and management approaches to improve safety.
- d) the access points including measures and treatments to manage conflict between pedestrians, cyclists, scooter users and vehicles
- e) pedestrian and cycle facilities, including the location of the pedestrian crossing on Middlefield Drive and Kea Crossing on Gracechurch Drive.
- f) the impact of any increase in vehicle movements on the safe and efficient operation of the adjacent streets
- g) the impact of any increase in demand for on-street parking on the safe and efficient operation of the street network

The Transport Assessment shall be prepared in consultation with Auckland Transport and the outcome of that consultation recorded in the outline plan. Any necessary relocation and upgrading of pedestrian crossings or other changes to transport infrastructure, subject to the approval of Auckland Transport, shall be undertaken at the Requiring Authority's expense.

3. School Travel Plan

- a) The Requiring Authority shall either directly or through the School Board of Trustees, continue to have in place a School Travel Plan.

b) The purpose of the School Travel Plan is to provide specifically for measures to reduce vehicle dependence, including walking school buses, carpooling, the encouragement of the use of public transport, the use of remote pick up/drop off locations if appropriate, and the encouragement of walking and cycling active modes of travel. The Travel Plan shall also address the management of on-site and on-street pick up and drop off, and onsite parking. This Travel Plan shall also specifically address the following matters:

- i. Safe access to the entry points to the school. Features such as Kea Crossings or Zebra Crossings should be specifically considered;
- ii. Consistency with or use of Auckland Transport's Travel Wise programme, or any equivalent programme adopted;
- iii. Measures to separate vehicle entry and pedestrian/cyclist entries active mode movements;
- iv. Location and provision on site of any scooter and cycle parking required;
- v. Measures to discourage parking over private driveways at adjacent sites in Gracechurch Street and Middlefield Drive;
- vi. Measures to manage the safe operation of pick up and drop off on the site and on the street including ongoing review of its operation; and
- vii. Measures to manage the operation of any stacked parking onsite so that it is used effectively.

c) The School Travel Plan shall be reviewed and updated as necessary by a suitably qualified and experienced transportation planner at the time of submitting each subsequent Outline Plan of Works relating to increased teaching spaces or any changes to vehicle access, parking or vehicle circulation features. Within six months of the opening of any such works, the School Travel Plan shall be monitored, and updated if necessary. Any changes to the School Travel Plan shall be developed in consultation with Auckland Transport.

ATTACHMENT 6

MOE'S RESPONSE TO MDRS

ATTACHMENT 6

Response from the MoE with regard to MDRS - email dated 8 June 2022

The MoE's position on the MDRS is as follows:

The application of the MDRS will have implications for the Ministry's delivery of education services and facilities across its network in Auckland and other Tier 1 urban environments. While application of the MDRS will not in itself generate growth, it will affect how growth is accommodated and distributed within these environments. How the Ministry responds is a wider issue than any particular school site, or area of intensification. It requires an holistic assessment of its network of schools relative to likely future growth and intensification throughout these urban environments.

The Ministry is engaged with local authorities in these Tier 1 environments (including Auckland Council), and has commenced work to understand a range of growth scenarios and how it might respond to these over the longer term. There are a range of possibilities, including more intensive school development incorporating larger scale buildings to accommodate a greater number of teaching spaces and other associated facilities. The Enabling Housing Act (RMA s77M) enables the Ministry to rely on the MDRS where the school is within or adjoins land subject to the MDRS and the MDRS is more lenient than conditions of relevant designation(s), meaning future School development can interface appropriately with the planned future environment of the surrounding residential area(s). The Ministry is still required to follow the Outline Plan process under s176A of the RMA, and will need to comply with any standard or specific conditions of designation that are not otherwise displaced by the MDRS.

The Ministry does not consider that the MDRS has direct implications for this notice of requirement. The proposal to remove the roll cap for Willowbank School assists the Ministry to accommodate any additional future roll growth. The additional site-specific conditions proposed to be inserted by this notice of requirement will ensure that any future outline plan process proposing increased teaching spaces is appropriately informed in terms of potential traffic effects by requiring the provision of a Transport Assessment and the review of the School Travel Plan.

As a general point, the Ministry's position is that intensification of existing schools within intensifying urban environments will be beneficial for the broader transportation network as it will facilitate the use of alternate and active modes of travel within the immediate School catchment.