

Appendix 1

15 May 2019

John Duguid, General Manager
Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142

Email: unitaryplan@aucklandcouncil.govt.nz

RE: AUCKLAND UNITARY PLAN (OPERATIVE IN PART): NOTICE OF REQUIREMENT TO DESIGNATE LAND AT 263 WEST HOE HEIGHTS, OREWA FOR EDUCATIONAL PURPOSES

Please find attached Auckland Transport's submission on the above Notice of Requirement by the Minister of Education (the requiring authority).

If you have any queries in relation to this submission, please contact Alastair Lovell, Manager Land Use Policy and Planning North / West on 09 447 5317.

Yours sincerely



Cynthia Gillespie
Executive General Manager Planning & Investment

Enc: Auckland Transport's submission on this Notice of Requirement to designate land at 263 West Hoe Heights, Orewa for educational purposes

cc: Minister of Education

c/- The Property Group Limited

PO Box 104 Shortland Street

Auckland 1140

Attention: Natasha Rivai

Via email: Nrivai@propertygroup.co.nz



Submission by Auckland Transport on the Notice of Requirement for a Designation by the Minister of Education at 263 West Hoe Heights, Orewa

To: Auckland Council
Private Bag 92300
Auckland 1142

Submission on: Notice of Requirement at 263 West Hoe Heights, Orewa

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

- 1.1 The Minister of Education ('MoE') seeks to designate approximately 2.89ha of land at 263 West Hoe Heights, Orewa for educational purposes which will provide for a new school catering for up to 800 students and an early childhood education centre (ECE) providing for up to 50 children (the proposal).

2. Reason for AT's submission

- 2.1 Auckland Transport (AT) is a Council-Controlled Organisation (CCO) of Auckland Council and the Road Controlling Authority for the Auckland region (excluding state highways). AT has the legislated purpose pursuant to section 39 of the Local Government (Auckland Council) Act 2009, to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'.
- 2.2 In achieving its purpose, AT 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. AT also works with third parties, seeking to avoid, remedy or manage the effects of land use and development on the transport network.
- 2.3 AT has a team dedicated to working with schools. This team responds to requests by schools / school boards for transport improvements and safety initiatives and encourages travel planning and mode share. The demand and funding required to service requests for transport improvements far outstrips AT's ability to respond and, in some cases, AT's role.
- 2.4 It is, therefore, essential that schools are located and designed in a fit for purpose way from the point of establishment and as the school grows incrementally, ensuring that the relevant foundation infrastructure is in place to cater for the school population. AT needs to identify that designation conditions are in place to ensure transport effects are appropriately managed. On this basis, AT cannot support this Notice of Requirement (NoR).
- 2.5 AT's submission outlines further information on what is needed to ensure that the transport effects from the proposal are appropriately assessed and appropriate mitigation measures identified and included as conditions on the designation.



2.6 For the avoidance of doubt, AT is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

3. **Specific parts of the notice of requirement that this submission relates to**

3.1 The specific parts of the NoR that this submission relates to are set out in **Attachment 1** and relate to the transport effects of the proposal including:

- Overall comments
- Location of the school
- Function and purpose of the school
- School catchment
- Traffic effects and trip generation
- Bicycle parking
- Pick up and drop off
- Walking and cycling connection
- Safety
- Orewa 2 Precinct roading network
- Transport Network Improvements
- Proposed Designation Conditions.

3.2 AT does not support the NoR as proposed. The matters raised in **Attachment 1** (and any other transport effects) will need to be appropriately addressed and the proposal amended to ensure that any adverse transport effects are avoided, remedied or mitigated.

3.3 AT considers that new and/or amended conditions to the designation will be required to ensure the transport effects are appropriately managed.

3.4 AT is available and always willing to work through the matters raised in this submission with the MoE. AT's preference on large proposals like this is to meet in advance of lodging any proposal.

4. **Recommendations and relief sought**

4.1 The recommendations that AT seeks from the Council are:

- decline the NoR in its entirety if the proposal cannot demonstrate that the transport effects can be avoided, remedied or mitigated, in particular the matters set out in **Attachment 1**
or
- approve the NoR, only if amendments to the NoR are made to ensure that transport effects of the proposal are avoided, remedied or mitigated, specifically the matters set out in **Attachment 1**. Appropriate designation conditions must be included to address the matters set out in **Attachment 1**.



5. Appearance at the hearing

5.1 AT wishes to be heard in support of this submission.

Name: Auckland Transport

Signature:

A handwritten signature in blue ink, which appears to read 'Cynthia Gillespie', is written over a faint blue circular stamp.

Cynthia Gillespie
Executive General Manager: Planning and Investment

Date: 15 May 2019

Contact person: Alastair Lovell
Manager Land Use Policy and Planning North / West

Address for service: Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: 09 447 5317

Email: alastair.lovell@at.govt.nz

Attachment 1 – Specific parts of the NoR that AT’s submission is concerned with and the relief sought

Issue	Position and reasons	Relief sought
Overall comments	<p>AT has reviewed a number of MoE NoRs over the last few years and, in most cases, these have included a reasonable level of analysis and technical review to support the proposed school with a set of conditions reflecting actual and potential effects that the operation of school have on the transport network at peak time of operation.</p> <p>This NoR and the supporting documentation have not reached the same level of assessment and, as a result, AT is unable to support this proposal as we have with others in the past. In particular:</p> <ul style="list-style-type: none"> • there are a number of inconsistencies within the NoR documentation that need to be explained, amended and/or additional information provided • the objectives of the NoR are broad and do not appear to serve a purpose with respect to the site, location, school catchment and the school’s purpose and conditions • there are potential inconsistencies in the stated purpose of the NoR • the Integrated Transport Assessment (ITA) makes assumptions around catchment size and mode share which appear unrealistic and are not supported by modelling or measures to ensure these outcomes are achieved • there is limited consideration of the ITA included in the NoR and no commentary on why recommendations in the ITA have not been included in the proposed NoR conditions 	<ol style="list-style-type: none"> 1. Approve the NoR only if amendments to the NoR are made to ensure that transport effects of the proposal are avoided, remedied or mitigated, specifically the matters set out in Attachment 1. Appropriate designation conditions must be included to address the matters set out in Attachment 1 <p>or</p> <ol style="list-style-type: none"> 2. Decline the NoR in its entirety if the proposal cannot demonstrate that the transport effects can be avoided, remedied or mitigated, in particular the matters set out in Attachment 1



	<ul style="list-style-type: none"> there does not appear to have been any engagement with the road controlling authority which, in its role of managing and controlling the transport network on behalf of Auckland, is potentially one of the most affected parties by the operation of schools. 	
Location of the school	<p>When choosing a location for a primary school site, the advice AT has provided to the MoE in the past is:</p> <ul style="list-style-type: none"> avoid locating schools on arterial roads and in the vicinity of key transport nodes due to the potential for safety and efficiency effects on such key infrastructure avoid dead-ends and cul-de-sac roads due to the potential for localised congestion, conflict between vehicles and modes, parking management and concerns from neighbouring residents. <p>AT would appreciate more information on the site selection process for the proposed school and the wider strategy that this fits within in terms of serving Orewa and the wider growth area.</p> <p>There are also some inconsistencies around the site address in the relevant documents, with some referencing the location as Sunnyheights Road and some referencing West Hoe Heights.</p>	<ol style="list-style-type: none"> Provide the site selection assessment for the school location, catchment and the wider strategy for serving Orewa and the wider growth area.
Function and purpose of the school	<p>The NoR states that the proposed school is a primary school (and an ECE) and there are various year ranges identified in the documentation. Section 5.0 of the NoR AEE proposes to adopt the standard conditions for MoE's designation as set out in the Auckland Unitary Plan (AUP). The purpose of that states:</p> <ol style="list-style-type: none"> Enable the use of the facilities on the designated site by and for the educational benefit of any school age students (i.e.: years 0 to 13) regardless of whether they are enrolled at an institution located on that designated site. <p>The ITA submitted with the NoR has assessed the proposal as a primary school. If the school alters from a primary school to a school which caters for all students between</p>	<ol style="list-style-type: none"> Clarify the level of educational facilities that this proposal is to provide for – is it years 0-13 or years 1 to year 6 as these are both used in the NoR documentation. Confirm the proposed school is a primary school and amend the NoR condition accordingly. Should the MoE confirm the proposed school is to cater for years 0-13, AT requests that the NoR be amended on the basis that it, the AEE,



	<p>years 0 – 13 or solely becomes a secondary school, the transport effects could be significantly different.</p> <p>Form 18 and the NoR AEE are not consistent in such information and this needs to be clarified. If the MoE's intention is for the proposed school to cater for years 0-13, the NoR (Form 18 and AEE) may need to be amended.</p>	<p>ITA and related conditions have not been presented as having assessed the transport effects of a year 0-13 school. Further information would then be required to assess the transport effects of the proposed facilities.</p>
School catchment	<p>The catchment for the school as shown in the ITA would consist of approximately 350 homes and it is unlikely to generate 800 pupils or the 50 ECE places identified. The majority of pupils would, therefore, need to come from outside of the identified school zone.</p> <p>Orewa Primary School (at 86 Maire Road, Orewa) is located approximately 1.1km south-west of the proposed school and Orewa North Primary School approximately 1.6km to the west of the proposed school. These schools have in the order of 330 and 430 pupils respectively and significantly larger catchments than the proposed school. Orewa College is also located approximately 1.5km east of the site and has approximately 1900 pupils.</p> <p>Based on the location of the school site, surrounding development and approved subdivisions, it would appear that the proposed school catchment may not generate sufficient pupil numbers without changing the school catchment or having a predominantly out of zone enrolment policy.</p> <p>More information regarding the school catchment is required. It would appear that the majority of pupils attending the proposed school would be out of zone and need to travel some distance, unless the long-term plan is to close and amalgamate schools and/or amend school zones. Such instances will change the distance and transport choices for pupils travelling to school. Information regarding other schools that could possibly be closed or merged with this one would also be useful to understand potential impacts on the wider transport network.</p> <p>AT understands that there are new developments that are occurring within the areas. For example, a large residential development is occurring to the southwest of the proposed site which will require school to cater for the upcoming population. There is</p>	<p>1. Provide additional information and clarification in relation to the following:</p> <ul style="list-style-type: none"> the proposed school role relative to the proposed school catchment the proposed school's enrolment policy, including out of zone enrolments, which would make up the majority of the 800 pupils the long-term strategy for schools in Orewa and the surrounding growth area, including new schools/ closures/amalgamations and their respective catchments.

	<p>also the Hall Farm Development located immediately to the west of the site. Albeit both of these developments are located on the other side of the motorway, it would still be possible for the school to service these catchments. Additional information / clarification would be required to understand how these developments would be provided with school facilities provided by the MoE.</p>	
Traffic effects, trip generation and mode share	<p>AT considers that the effects on the transport network for the proposed school and ECE role have potentially been underestimated.</p> <p>The ITA has assessed a proposed primary school based on two concept plans. As noted above, further assessment is required if years 0 – 13 are proposed for the school.</p> <p>The ITA has assessed the proposal based on a high level of walking / cycling mode share i.e. 60% walking and 10% cycling, due to the limited catchment identified for the school. As discussed above, the school's catchment is potentially unlikely to generate sufficient pupil numbers without changing the school catchment or having an out of zone enrolment policy.</p> <p>AT understands that approximately 50-60% of pupils are dropped off at primary schools by private motor vehicles and these percentages are generally getting higher rather than improving. Modelling needs to be undertaken based on more realistic mode share taking into account the current transport context.</p> <p>An appropriate assessment of the proposal will be required that reflects an appropriate / realistic mode share percentage for students travelling to and from a school in this location.</p>	<ol style="list-style-type: none"> 1. Update the ITA and assessment to include a scenario based on the school's realistic catchment to serve 800 pupils and 50 ECE children. 2. Update the ITA and assessment to include a scenario based on a mode share that reflects existing primary schools. This should include modelling and consideration of the local road network to accommodate vehicle movements at peak times. 3. Demonstrate how the envisaged mode share will be achieved by the proposed school, and how this will be monitored and enforced, or additional mitigation provided should there be adverse effects on the transport network. 4. Include conditions on the designation that will appropriately manage the transport matters raised above.
Bicycle Parking	<p>The ITA concluded there will be a high level of cycle demand and students will be encouraged to walk and bike to school. AT supports using active modes for travelling to schools and so requests that sufficient bicycle parking spaces are provided on-site.</p>	<ol style="list-style-type: none"> 1. Include a condition that requires the provision of covered and total bicycle parking spaces to meet the requirements of the AUP.



	<p>Chapter E27 of the Auckland Unitary Plan (AUP) requires the following for primary and intermediate schools:</p> <ul style="list-style-type: none"> • 1 long term space per 30 students in year 1 to 5 plus 1 per 15 students Year 6 to 8 plus 1 per 20 employees. • 1 short term space plus 1 short term space per 400 students and FTE employees. <p>Chapter E27 of the AUP requires the following for secondary schools:</p> <ul style="list-style-type: none"> • 1 long term space per 15 students in year 9 to 13 plus 1 per 20 FTE employees. • 1 short term space plus 1 short term space per 400 students and FTE employees. <p>Depending on the function of the school, and to achieve the envisaged mode share identified by the NoR documentation, the proposal will be required to provide the number of bicycle parking spaces to meet the requirement of the AUP.</p>	
Pick up and Drop off (PUDO)	<p>The final design of the school will be provided as part of the Outline Plan of Works application and the PUDO facilities will be assessed at that time. AT accepts the assessment made in the ITA regarding PUDO and that it will comply with the requirement of the AUP.</p> <p>Vehicular on-site pick up and drop off areas for the school and ECE are to be provided separately. The number of pick up and drop off bays will be determined by an assessment of the peak demand for vehicles entering and exiting the site. This assessment will be undertaken, and the results submitted with the outline plan of works and as part of any future outline plans where there is an increase in student numbers.</p>	<ol style="list-style-type: none"> 1. Include a condition in the designation that requires the proposed PUDO for the school and the ECE to meet the requirements of the AUP. 2. Include a condition in the designation that requires the PUDO facilities to be on-site. 3. Confirm if a bus picks up and drop off will be required. 4. Include a condition that requires assessment of PUDO facilities (vehicular and bus) at the time of any increase in student numbers.



<p>Walking and cycling connections</p>	<p>The ITA has identified existing facilities and stated future walking and cycle facilities will be provided for in the area, however, an assessment to determine whether they are safe or appropriate for the school's operation has not been provided. It is also unclear whether the ITA is referring to additional facilities or ones that are already being provided by the underlying subdivisions.</p> <p>The ITA states that "the footpaths currently being constructed on local streets in the area are generally 1.8 m wide." It further notes that "while this is appropriate to support residential land uses currently proposed, they are not necessarily sufficient to provide access to a large primary school." The footpath on the main school frontage should be widened to 3 metre to accommodate the proposed school and ECE. Given the comment in the ITA, consideration should be given to whether the designation should include a condition for the provision of sufficient width in other key locations to service the school.</p> <p>The ITA does not identify the number or the general location of pedestrian crossings required for the operation of the school and the ECE. There should be at least one on each road which borders the school and potentially more in the surrounding vicinity which provide the walking and cycling connections to the school.</p> <p>The ITA states that a public walkway will be provided to the east of the site, however, it is unclear whether this will form part of the final school design or whether this is being provided as part of the underlying subdivision.</p> <p>AT supports the proposed school travel plan to encourage walking and cycling to and from the school. The ITA provides appropriate recommended condition wording and this has not included in the proposed conditions.</p>	<ol style="list-style-type: none"> 1. Request the ITA be updated with an assessment of the proposed walking and cycling facilities and whether they are appropriate and safe for such a school environment. 2. Request further information regarding the locations and number of pedestrian crossings to be provided for the school and the ECE. 3. Confirm that public walkway to the east of the site will be provided as part of the school and include a condition as such. 4. Include as conditions to the designation to provide for safe walking and cycling connections. 5. Include conditions to ensure the designation provides footpaths with appropriate width to service the school and the ECE including a 3 metre wide footpath on the main school frontage. 6. Include the ITA condition for a school travel plan in the designation and way in which this plan will be monitored and enforced.
<p>Safety provisions</p>	<p>The ITA has not addressed the speed environment around the school or its catchment. It should provide an assessment of a safe operating speed for the school and the ECE and what measures are required to achieve this.</p> <p>The ITA has identified the need to provide for zebra and kea crossings that border the school to ensure students can cross the streets safely. AT supports this approach and accepts it should form part of the designation conditions as noted above.</p>	<ol style="list-style-type: none"> 1. Provide conditions to address road safety and between modes, outside the proposed school sites and on the roads to the school site.



		<ol style="list-style-type: none"> 2. Update the ITA to include an assessment of a safe operating speed around the school and the ECE and within its catchment 3. Include any conditions resulting from the safe operating speed assessment that are necessary for the operation of the school and the ECE 4. Include a condition recognising the provision of zebra and kea crossings by the applicant /school.
Roading network for Orewa 2 precinct	<p>The site is part of the Orewa 2 sub-precinct A where a local road is indicated on precinct plan 1 to provide alternative access to Sunnyheights Road. The underlying subdivision provided this alternative access and connects it with Street A, however, the MoE proposal will now remove this connection.</p> <p>Section 5.11 of the ITA considered the proposal against the precinct plan requirement. It states that the school will replace this alternative through access with a public walkway for active modes to be provided immediately east of the school. The ITA has not adequately assessed the impact of the proposal on the remaining residential subdivision nor provided justification of how the changes could be mitigated by a replacement public walkway. While the ITA states that the school will replace this access with a public walkway, this is not included as a condition.</p>	<ol style="list-style-type: none"> 1. Provide assessment of the proposed changes to the local street network and assess the impact on the remaining road network. 2. Include a condition requiring this public walkway as a mitigation measure of the proposal. 3. Provide justification that the proposed walkway will be sufficient to mitigate the effects on the underlying roading network. If this is considered insufficient, include appropriate condition(s) to address the effects.
Transport network improvements	<p>AT understands that on average about 50-60% of pupils are currently delivered to primary schools by private vehicle and that mode share is generally getting worse with private vehicles favoured by parents for various reasons. The proposed school role would potentially amount to about 300-500 vehicle movements in the morning peak. Appropriate modelling needs to be undertaken.</p>	<ol style="list-style-type: none"> 1. Update the ITA to identify what projects are required / relied on and how they will be funded / provided. In particular: <ul style="list-style-type: none"> • demonstrate that a school bus can safely access the school and turnaround when



	<p>Section 6.3 of the ITA identifies that a number of improvements are required to the local transport network. The ITA guidelines require any such improvements to be identified in the ITA, whether these are required to provide or service the development, whether any of these are funded or unfunded projects in the Regional Land Transport Programme, and if not, how these improvements will be provided.</p> <p>If these improvements are required for the school to open and/or are needed for the school to be able to operate at a certain capacity, this needs to be included in the designation conditions. Without this specification, it is often difficult to achieve this outcome given the limitation of the outline plan process.</p>	<p>the surrounding local roads are parked out at school opening and closing times</p> <ul style="list-style-type: none"> the wider walking and cycling network required to service the mode share, and the catchment of the school that would be realistic with a role or capacity of 800 pupils the immediate walking and cycling network required to service the school including wider footpath and pedestrian crossings speed safety measures necessary for the operation of the school demonstrate that the local road network (effectively a cul-de-sac) can accommodate private vehicle movements for pick up / drop off and travel to and from the school at peak times any other upgrades needed to service the increased vehicle movements at nearby intersections <p>2. Include appropriate conditions, which provide for the required transport network improvements to be in place in advance of the school opening and/or as the school is developed in the future. If this is unclear because the work has not been undertaken at this point, a condition may be required for a new ITA to be submitted and approved by AT in advance of submitting any outline plan (or similar wording).</p>
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<p>Proposed Designation Conditions</p>	<p>There are inconsistencies between the proposed conditions in the NoR AEE and the ITA. No commentary has been given on why the ITA's proposed conditions have not been included as proposed conditions on the designation.</p> <p>AT generally supports the proposed conditions in the ITA as they are reasonably comprehensive and address the following key matters:</p> <ul style="list-style-type: none"> • access location for vehicles, scooters/ cyclists and pedestrians and parking areas as well as PUDO • measures to manage safety and conflict between pedestrians, cyclists/ scooter users and vehicles • areas to provide for future growth including car parking spaces • safe access for all modes • on-site staff and visitor carparking, cycling and scooters parking, loading spaces to facilitate deliveries and rubbish removal • onsite PUDO that will be designed to accommodate predicated demand for the school and ECE including sufficient and safe vehicle accesses, circulation and manoeuvring for cars and buses • consideration of the safe and efficient movements of pedestrians and cyclists within the school catchment and provide measures to mitigate any impediments • measures to mitigate any adverse effects on the transport network • measures that will promote and encourage safe walking and cycling to and from the school • measures that will provide safe, convenient and appealing access to public transport. <p>The proposed conditions in the ITA also require a summary of consultation and engagement with AT for a number of specific transport matters. AT supports this and considers it appropriate to ensure measures will be effective to address effects on the transport network.</p>	<ol style="list-style-type: none"> 1. Explain why the recommended conditions of its transport experts have not be included in the proposed conditions. 2. Support the proposed conditions in the ITA, subject to some amendments where necessary, and that these are included as proposed condition on the designation. 3. Include additional condition(s) to address the other matters raised in this submission.
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