



16 October 2019

Auckland Council  
Private Bag 92300  
Victoria Street West  
AUCKLAND 1142

Attention: Stephen Town, Chief Executive

Dear Stephen

## **AUCKLAND COUNCIL UNITARY PLAN**

### **Decision of the Minister of Education regarding a notice of requirement under Section 168(2) of the Resource Management Act 1991 for a designation for Educational Purposes – Primary School [years 0-6] and Early Childhood Education Centre at 289 West Hoe Heights, Orewa**

- 1 Thank you for your letter of 3 September 2019 enclosing Auckland Council's recommendation (**Recommendation**) relating to the above notice of requirement (**NOR**).
- 2 Pursuant to s 172(1) of the Resource Management Act 1991 (**RMA**) the Minister advises Auckland Council that the Recommendation is accepted in part.
- 3 The Minister confirms the NOR designating 289 West Hoe Heights, Orewa for Educational Purposes – Primary School [years 0-6] and Early Childhood Education Centre at 289 West Hoe Heights, Orewa, subject to the conditions set out in **Appendix A**.
- 4 Pursuant to s 172(3) of the RMA, the Minister gives his reasons for accepting the Recommendation in part below.

#### **Reasons**

- 5 The Minister agrees with the Recommendation's conclusions that:
  - (a) Additional primary school facilities will be needed in the wider Orewa area;<sup>1</sup>
  - (b) The work and designation are reasonably necessary to achieve the Minister's objectives;<sup>2</sup>
  - (c) The Minister undertook an adequate assessment of alternative locations for a new primary school to serve north-west Orewa;<sup>3</sup>

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<sup>1</sup> Recommendation, paras 16-18.  
<sup>2</sup> Recommendation, para 34.  
<sup>3</sup> Recommendation, paras 19-21.

- (d) A 10 year lapse period for the designation is appropriate;<sup>4</sup> and
- (e) Subject to appropriate conditions, the work will not have significant adverse effects on the environment.<sup>5</sup>

6 However in regard to the last point, the Minister disagrees with the Recommendation in relation to the question of what conditions are appropriate. Primarily, the Minister does not consider that it is appropriate or necessary for the designation conditions to be as prescriptive about the outline plan of works process as recommended by the Council.

7 The designation process under the RMA provides for land to be required for public works. This power is only given to responsible entities performing public functions. Putting aside the matter of compulsory acquisition, the effect of a designation ranges across a spectrum:

- (a) At one end of the spectrum, a designation may do nothing more than indicate that land has been set aside for a specific purpose, securing the site from other parties' interference<sup>6</sup> and giving the community notice of the likely use of the land. This type of designation is akin to rezoning the land for a special purpose; and
- (b) At the other end of the spectrum, a designation may provide for a specific, detailed work and include detailed conditions. This type of designation is more comparable to a resource consent.

8 The outline plan of works process under s 176A of the RMA addresses the gap between these two ends of the spectrum.<sup>7</sup> In the case of a zoning-like designation, the outline plan of works process provides the functional equivalent of a resource consent process once the details of the public work have been settled on.

9 In order for the Minister to fulfil his obligation to provide schooling facilities to a growing population, he must plan and provide for the establishment of new schools where they will be needed. In order to do so in an efficient, co-ordinated and cost-effective way, the Minister typically looks to acquire land in developing areas before the surrounding community and infrastructure is fully established. In such situations the Minister does not delay acquiring or setting aside the site in order to first embark on a detailed design process for the school – that is a substantial undertaking that would delay the designation and acquisition processes, and would be in vain if it turned out the site could not be designated. Instead the Minister seeks a flexible designation as early as possible.

10 As a result, the school designations sought by the Minister are typically at the zoning-like end of the designation spectrum. At this end of the spectrum, the designation process isolates any sites that have insurmountable problems, and where significant adverse effects are anticipated, it requires that consideration has been given to alternative sites. The designation is merely intended to secure the site, give notice to the community of the likely use of the land, and give the Minister the confidence to invest in the detailed design for the site.

11 In such cases, it is not efficient or effective for the designation process or conditions to descend into matters of detail that will have to be considered at the outline plan of works stage, and can be addressed with certainty only once the detailed design for the school exists. Maintaining flexibility is vital.

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4 Recommendation, paras 35-36.

5 Recommendation, para 33.

6 RMA, s 176(1)(b).

7 RMA, s 176A(2).

- 12 Sections 176A(3)(a) to (e) require an outline plan of works to show height, shape, bulk, location, contour, vehicle access, circulation, parking and landscaping. Clearly any designation conditions requiring the outline plan of works to address these matters would be duplicative and redundant.
- 13 The final matters to be addressed by an outline plan of works, under s 176A(3)(f), are “any other matters to avoid, remedy, or mitigate any adverse effects on the environment”. This requirement encompasses any adverse effects that need to be addressed. The Council has a right to review<sup>8</sup> and request changes<sup>9</sup> to an outline plan if it does not adequately address such matters, and a right of appeal to the Environment Court.<sup>10</sup> On appeal, the Environment Court is directed to make a decision that will “give effect to the purpose of [the RMA]”.<sup>11</sup> Section 176A of the RMA provides a robust process to identify and address any adverse effects that arise out of the school’s detailed design.
- 14 The Minister is concerned to see that designation conditions:
- (a) Do not constrain the detailed design and outline plan of works processes prematurely;
  - (b) Are not duplicative or redundant, cluttering the district plan and making compliance more convoluted;
  - (c) Do not overlap with the requirements of s 176A(3) in a potentially confusing way; and
  - (d) Are generally confined to matters of ongoing application, given the long life of a designation in the district plan.
- 15 It is also relevant that the conditions of the designation apply to the Minister. The Minister is not a financially incentivised developer. The Minister holds a ministerial warrant from the Crown to perform his functions, with extensive responsibilities and powers under the Education Act 1989 and other legislation. The Minister has requiring authority status under the RMA. The Minister administers an extensive portfolio of schools and is continually building new schools and expanding existing ones.
- 16 Due to the Minister’s motivation, responsibilities and experience, highly prescriptive designation conditions about matters to be addressed at the outline plan of works phase are more likely to be unhelpfully restrictive than helpfully directive.
- 17 The Minister’s decision in relation to each of the conditions set out in the Recommendation follows below.
- Recommendation: Standard Ministry of Education conditions applicable unless site-specific conditions apply*
- Decision: Accept*
- 18 The Minister considers the standard conditions for Ministry of Education designations in the Auckland Council Unitary Plan are appropriate and sufficient in almost all cases.
- Recommendation: Purpose of designation described as “Educational Purposes – primary school (years 0 - 6) and may include an early childhood education facility.”*

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<sup>8</sup> RMA, s 176(1).

<sup>9</sup> RMA, s 176(4).

<sup>10</sup> RMA, s 176(5).

<sup>11</sup> RMA, s 176(6).

*Decision: Accept*

- 19 The Minister considers that this is an appropriate description of the purpose of the designation and in particular agrees with the Recommendation not to include a maximum number of pupils in the description as had been proposed by the reporting planner. Inclusion of a maximum number would have put the school in a difficult position if it had to accept enrolment of a higher number of students under the Education Act.

*Recommendation: Condition 1 – Height in Relation to Boundary*

*Decision: Reject in favour of standard Ministry of Education designation conditions in Auckland Council Unitary Plan*

- 20 The Recommendation was to set the height in relation to boundary controls by reference to the district rules that apply to the adjacent land. The Minister prefers the height in relation to boundary control in the standard Ministry of Education designation conditions. This is not likely to result in any significant difference, but provides a fixed standard that will not vary if the district rules change. This provides the school and its neighbours with greater certainty, which is mutually beneficial.

*Recommendation: Conditions 2 and 3 – Geotechnical*

*Decision: Reject*

- 21 The Recommendation was to include the following conditions:
2. All site development shall meet the recommendations of the Geotechnical Investigation prepared by Coffey dated 16 November 2016 (Appendix 4 of the Notice of Requirement application); and as a minimum include an investigation of landslide risk and mitigation, together with long term groundwater drainage considerations.
  3. The investigation and analyses shall be carried out by a suitably qualified geotechnical engineer with experience in the materials and issues presented within previous reports on the site.

- 22 The Minister considers that these conditions will be redundant. The Geotechnical Investigation prepared by Coffey dated 16 November 2016 (**2016 report**) will be superseded by more detailed reports, such that requiring adherence to the 2016 report may be counterproductive.

- 23 Further, the Minister will be undertaking extensive earthworks at the site which are regulated by regional rules in the Auckland Council Unitary Plan, so these works will be controlled by a resource consent. Also, building work will be subject to regulation under the Building Act 2004. Inclusion of an additional set of controls over the same matters under the designation conditions will make the works unnecessarily complicated.

*Recommendation: Conditions 4 and 5 – Maximum Impervious Area*

*Decision: Accept*

- 24 The Minister agrees that these conditions are appropriate in light of the stormwater management infrastructure that has already been or will be provided in this catchment.

*Recommendation: Condition 6 – Consultation and Engagement with Auckland Transport*

*Decision: Reject*

- 25 The Minister considers that this condition is redundant given the necessity for consultation with Auckland Transport as regards the school travel plan and “establishment outline plan” of works in later conditions, and the necessity to consult with Auckland Transport as regards any works in the road corridor.

*Recommendation: Condition 7 – Establishment Outline Plan*

*Decision: **Reject in favour of substitute** condition*

- 26 The Recommendation was for a very prescriptive condition regarding the first outline plan of works, referred to as the Establishment Outline Plan in the conditions:

**Establishment Outline Plan**

7. The requiring authority shall, in accordance with the requirements of s176A of the Resource Management Act, submit an Establishment Outline Plan for the construction and development of the school (and Early Childhood Education Centre (ECE) if development coincides) which will confirm the anticipated school (and ECE) roll and will include the following further information:

- A) A Design Concept Plan for the site showing:
- i. The general location and access points for vehicles (including but not limited to buses, rubbish trucks and ground and building maintenance), \*scooters/cyclists and pedestrians, parking areas (including bicycle/scooter parks), and pick-up and dropoff areas;
  - ii. Measures and treatments at all access points to manage conflict between pedestrians, cyclists/scooter users and vehicles;
  - iii. General location of building platform areas for proposed buildings and open space (such as playgrounds and sport fields).
- B) A Traffic Impact Assessment (TIA) Report prepared by a suitably qualified traffic engineer and/or transportation planner which addresses, in addition to safety and efficiency, the following specific matters:
- i. Safe access to the site from and along all routes for pedestrians, cyclists, scooter users and vehicles (including buses, rubbish trucks and ground and building maintenance) and appropriate measures and treatments to minimise conflict between transport modes;
  - ii. The provision of on-site school and early childhood education centre staff and visitor car parking, bicycle and scooter parking, and loading spaces to facilitate deliveries and rubbish removal;
  - iii. The separate on-site pick-up and drop-off area specifically designed to accommodate predicted vehicle demand including vehicular access, circulation, manoeuvring for cars and buses;

- iv. Measures that encourage and provide for safe walking and cycling or scooter use along routes leading to and from the proposed school, including but not limited to:
    - a. Celestial Crescent between Sunnyheights Road and West Hoe Heights (with consideration given to the speed environment on these routes)
    - b. on road interventions such as widening of footpaths installation of pedestrian crossing points in the form of kea or zebra crossings or pedestrian refuges, cycle paths, routes and crossing facilities for the safe movement of cyclists and scooter users to the site and the time and means by which these are to be implemented v. Measures that provide or support safe, convenient and appealing access to the public transport network for staff and pupils of the school.
  - vi. Measures to ensure that motorists on the local road network are able to turn around safely on any street that is converted to a cul-de-sac as a result of the development of the site.
- C) A summary of the Consultation and Engagement with Auckland Transport (Road Controlling Authority) and Auckland Council (Territorial Authority) required by condition 6, recording agreements reached on the traffic and transport matters and any unresolved matters raised by the Establishment Outline Plan of Works, including effects associated with the school and early childhood education facility on the adjoining existing and future transport network. A copy of the draft Design Concept Plan and draft Traffic Impact Assessment prepared to support the Establishment Outline Plan is to be provided to Auckland Transport for the purposes of this consultation and engagement.

\*The term "Scooters" refers to electric and non-electric scooters ridden by children; and does not include vehicles that require a license to operate.

- 27 The Minister is required to submit an outline plan of works under s 176A by the RMA. The statutory requirement in s 176A(3)(a), (b), (d) and (f) render the majority of recommended condition 7.A redundant. The only additional matters that recommended condition 7.A requires to be included in the outline plan are:
- (a) Access points for scooters/cyclists and pedestrians; and
  - (b) Parking areas for bicycles and scooters.
- 28 To the extent necessary, these are matters that the Minister will address pursuant to condition 7.B in any event. The Minister therefore considers condition 7.A to be unnecessary.
- 29 Recommended condition 7.B requires a TIA report to be produced as part of the outline plan of works process. It would require the TIA to "address" safety and efficiency as well as a lengthy list of specific concerns. It is usual practice for the Minister to produce a TIA report to fulfil the statutory requirements under s 176A(3)(d) and (f).

- 30 The Minister considers that the word “address” should be replaced with the word “considers” in the head paragraph of condition 7.B to avoid prematurely committing the Minister to measures that may be unnecessary or lie beyond the Minister’s responsibility.
- 31 As regards recommended condition 7.B(i), the Minister concurs with the Recommendation that safe access for users of all modes of transport should be considered as part of the TIA. However, the version of this condition in the Recommendation could be taken to infer that the Minister is responsible for making access safe along all routes to the school. While the aim is commendable, it lies beyond the Minister’s powers and responsibilities. Further, these routes would generally have been used by the local children as they travelled to existing schools if the new school were not being provided. The fact that there will be children travelling from their homes to a school is an underlying constant, not an effect of this designation that the Minister should be required to mitigate.
- 32 As regards recommended conditions 7.B(ii) and (iii), these matters are adequately addressed by the standard conditions for Ministry of Education designations in the Auckland Council Unitary Plan and therefore will have to factor into any TIA in any event. The repetition of these matters is unnecessary.
- 33 Regarding recommended condition 7.B(iv), the Minister accepts that any pedestrian, cyclist and scooter safety measures on the main approaches to the school should be taken into account as part of the TIA. However implementation of such measures lies beyond the Minister’s powers and responsibilities.
- 34 In relation to recommended condition 7.B(v), the Minister concurs that the TIA should consider provision for public transport.
- 35 In relation to recommended condition 7.B(vi), the Minister notes that the only planned street that will be converted into a cul-de-sac by the designation is Crozier Place. The requirement to provide space to turn around safely on the street is premature, as it may be that a pick-up and drop-off facility will be provided on the school site for vehicles using Crozier Place.
- 36 As regards recommended condition 7.C, the Minister concurs that the TIA should record consultation with Auckland Transport, including those matters that have been agreed and any that remain unresolved.
- 37 A re-drafted version of recommended condition 7 is included in Appendix A as conditions 3-4.
- Recommendation: Conditions 8-11 – Bicycle Parking*
- Decision: Reject*
- 38 The recommended conditions are overly prescriptive and not sufficiently adaptive. The Minister does not agree that it is necessary to, for example, have a traffic engineer determine the number of scooter parking spaces required and then provide covered parking for all the predicted scooters. Bicycle and scooter parking can be better dealt with through the school travel plan and outline plan of works processes.
- Recommendation: Conditions: 12-17 – School Travel Plan*
- Decision: Reject in favour of substitute condition*
- 39 The Minister concurs that a school travel plan should be required in order to promote safe travel to and from school and the use of non-vehicular modes.



- 40 Recommended condition 12 required the first iteration of the school travel plan to be prepared prior to the opening of the school. That requirement is not appropriate because:
- (a) A meaningful travel plan cannot be formulated at that stage – the roll of the school, the location of students, their travel routes and so forth will not yet be known; and
  - (b) The school’s Board of Trustees will not yet be in place to formulate the travel plan.

41 A re-drafted school travel plan conditions is included in Appendix A as conditions 5-7.

*Recommendation: Conditions: 18-20 – Early Childhood Education Centre Travel Plan*

*Decision: Reject in favour of substitute condition*

42 The Minister concurs that an early childhood education centre travel plan should be required in order to promote safe travel to and from the centre and the use of non-vehicular modes. The recommended conditions would benefit from consolidation.

43 A re-drafted early childhood education centre travel plan conditions is included in Appendix A as condition 8.

*Recommendation: Condition 21 – Construction*

*Decision: Reject*

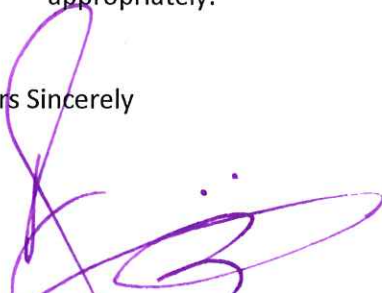
44 The best time for construction management to be planned may be after the outline plan of works is submitted. Such plans are often prepared for the Ministry by its contractors. Further, the requirement for such plans is likely to arise separately in the context of the various outline plan of works, resource consent and building consent processes.

*Recommendation: Condition 22 – Site Maintenance Plan*

*Decision: Reject*

45 This condition is unnecessary as a matter of practice. The Minister’s land is maintained appropriately.

Yours Sincerely



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## APPENDIX A

### XXXX Ōrewa North West Primary School

Designation Number	XXXX
Requiring Authority	Minister of Education
Location	289 West Hoe Heights, Ōrewa (part Lot 800 - 801 DP 528791)
Lapse Date	10 years after the date it is include in the District Plan under section 175 of the Resource Management Act 1991 (RMA) if it has not been given effect to before the end of the period

#### Purpose

Educational Purposes – primary school (years 0 - 6) and may include an early childhood education facility.

#### Conditions

The standard conditions for all Minister of Education designations shall apply to this designation. Where any standard conflicts with any site specific conditions below, the site specific condition will take precedence.

#### Site Specific Conditions

##### Maximum Impervious Area

- 1 The maximum impervious area must not exceed 70% of site area.
- 2 Where site impervious area is developed beyond 70%, onsite stormwater mitigation must be provided for the additional impervious area. Details of the onsite stormwater mitigation shall be provided with the Outline Plan of Works.

##### First Outline Plan of Works for the School

- 3 The first outline plan of works for the school shall include a Traffic Impact Assessment (TIA) Report prepared by a suitably qualified traffic engineer and/or transportation planner which considers, in addition to safety, efficiency and matters set out in s 176A(3) of the RMA, the following specific matters:
  - (a) Promotion of non-vehicular modes of transport to and from the school;
  - (b) Safety for non-vehicular modes of transport at the school's access points;
  - (c) Safe and convenient access to public transport;

- (d) Provision for vehicles picking up and dropping off school children to turn around safely;
  - (e) The safety of non-vehicular transport routes adjacent to the school.
- 4 The first outline plan of works for the school shall be accompanied by a summary of consultation and engagement with Auckland Transport and Auckland Council, recording agreements reached on the traffic and transport matters and any unresolved matters raised by the Establishment Outline Plan, including effects associated with the school and early childhood education facility on the adjoining existing and future transport network. A copy of the draft Establishment Outline Plan and a copy of the draft TIA are to be provided to Auckland Transport for the purposes of this consultation and engagement.

#### School Travel Plan

- 5 Within six (6) months of the school opening, the requiring authority shall either directly or through the School Board of Trustees, review the School Travel Plan and revise the Travel Plan as is necessary.
- 6 The purpose of the School Travel Plan is to provide specifically for measures to promote safe travel to and from school, to reduce vehicle dependence (including walking school buses, carpooling, the encouragement of the use of public transport, and the encouragement of walking and cycling). This Travel Plan must also specifically address the following matters:
- (a) Safe access to the entry points of the school. Features such as kea crossings or zebra crossings should be specifically considered;
  - (b) Consistency with or use of Auckland Transport's Travelwise Programme, or any equivalent programme adopted;
  - (c) Measures to separate vehicle entry and pedestrian/cyclist entries;
  - (d) Location and provision on site of any scooter and bicycle parking;
  - (e) Monitoring the use of different modes of transport to and from school.
- 7 The Board will seek the assistance of Auckland Transport in the development of the School Travel Plan and monitoring programme. This Plan must be reviewed where there is an increase in teaching spaces.

#### Early Childhood Education Centre Travel Plan

- 8 A Travel Plan for the early childhood education centre on the site must be developed in consultation with Auckland Transport, and be revised in consultation with Auckland Transport if at any stage the centre is expanded to cater for additional children.

#### **Attachments**

No attachments.

## **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 LAeq
Sunday 9am to 6pm	
All other times	45 dB LAeq 75 dB LAFmax

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

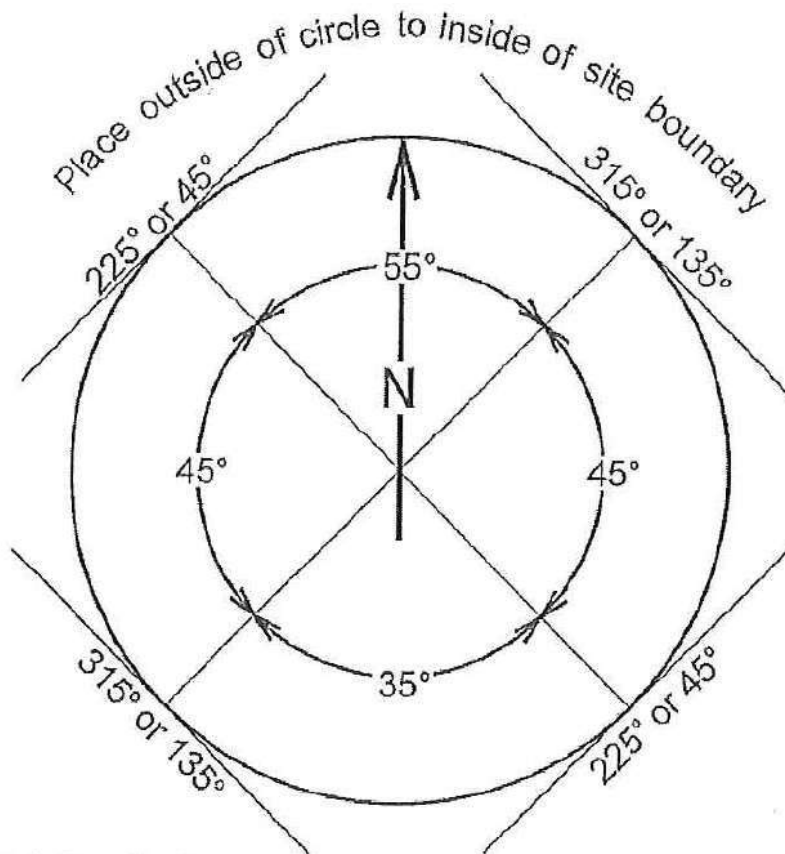
maintenance undertaken by hand operated secateurs or pruning shears in accordance with accepted arboricultural practice, or where removal or trimming is required to safeguard life or property.

## 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



Note: North is True North  
Bearings on the circle increase in a clockwise direction

### Recession Plan Cross Section

