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Auckland Council Private Bag 92300 Victoria Street West Auckland 1142

4 September 2019

### Attention: Unitary Plan team

To whom it may concern,

### Notice of Requirement by the Minister of Education for Designation for "Education Purposes"

Please find attached a Notice of Requirement (NoR) and accompanying Assessment of Effects on the Environment, lodged on behalf of the Minister of Education (the Minister). The NoR applies to approximately 7,700m2 of land, located at 22-24 Waipareira Avenue (Lot 1 DP 193312), Henderson, Auckland. The site is owned by the Minister.

The Minister wishes to designate an existing educational facility at 22-24 Waipareira Avenue, Henderson, Auckland. The site contains 'Pohutukawa Villa', Middle School West Auckland's Te Reo Bilingual Unit and is used to provide educational support for approximately 60 students.

Under the Auckland Unitary Plan the site is zoned Business – Light Industrial. As set out in the accompanying NoR, any adverse effects on the environment are considered to be less than minor. In addition, no rule or national environmental standard requires public notification of this NoR.

In terms of payment of the lodgement fee (being \$10,000 for a Notice of Requirement), we request that this be invoiced to Beca's account with Auckland Council.

We request that the invoice be attentioned to Marcus Bishop, with a reference of 'Job number 4263529'.

- Customer number: 2650404324
- Contract Number: 27800084232

If you have any questions in relation to this NoR please contact the undersigned. We look forward to hearing from you in due course.

Yours sincerely

tisup

Marcus Bishop Planner

on behalf of Beca Limited Direct Dial: +64 4 460 1782 Email: marcus.bishop@beca.com

## Resource Management Act - Form 18

### To Auckland City Council,

The Minister of Education gives notice of a requirement for a designation for a public work.

#### The site to which the requirement applies is as follows:

• 22 Waipareira Avenue, Henderson, Auckland (Lot 1 DP 193312).

#### The nature of the proposed public work is:

 To provide for the continued operation of an existing education facility for 'Education purposes' under the designation of the Minister.

#### The nature of the proposed conditions that would apply are:

The standard conditions for all Minister of Education designations under the Auckland Unitary Plan are
proposed to apply to this designation.

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

Please refer to Section 4 of the attached application

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

• The site which this notice seeks to designate contains an existing and well-established activity and built environment. Considering this, no alternative has been assessed as part of this process.

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

 Designating educational facilities provides certainty in the current and future management of education sites.

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

 A resource consent for the establishment and operation of an education centre on the subject site is held by the Ministry of Education, which was granted 31 October 2000.

No consultation has been undertaken as there are no parties that are likely to be affected.

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.

- West Auckland Middle School Notice of Requirement
- Record of Title
- Designation Conditions

Signature of person giving notice (or person authorised to sign on behalf of person giving notice)

28 08 2019

Date



# West Auckland Middle School - Notice of Requirement

For submission to Auckland City Council

Prepared for Ministry of Education Prepared by Beca Limited

14 May 2019



Creative people together transforming our world

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## **Appendices**

Appendix A – Record of Title

Appendix B – Designation Conditions



West Auckland Middle School - Notice of Requirement

### **Revision History**

Revision Nº	Prepared By	Description	Date
A	Marcus Bishop	Draft for client feedback	26/06/2019
В	Marcus Bishop	Revised to include Form 18 – final for lodgement	02/08/2019

### **Document Acceptance**

Action	Name	Signed	Date
Prepared by	Marcus Bishop	tisup	02/08/2019
Reviewed by	Nathan Baker	Biter	16/08/2019
Approved by	Nathan Baker	Biter	16/08/2019
on behalf of	Beca Limited	a.	
Approved by	Clive Huggins	Huggin	23/08/2019
on behalf of	Ministry of Education		1

igodot Beca 2019 (unless Beca has expressly agreed otherwise with the Client in writing).

This report has been prepared by Beca on the specific instructions of our Client. It is solely for our Client's use for the purpose for which it is intended in accordance with the agreed scope of work. Any use or reliance by any person contrary to the above, to which Beca has not given its prior written consent, is at that person's own risk.



## Overview

Requiring Authority:	The Minster of Education	
Objective:	To provide for the continued operation of an existing education facility for 'Education purposes' under the designation of the Minister	
Site address:	22 Waipareira Avenue, Henderson, Auckland	
Legal Description:	Lot 1 DP 193312	
Landowners:	Minister of Education (Education Purposes (support Centre) New Zealand Gazette 2000 p 954)	
Relevant legislation:	Notice of Requirement for a designation under Section 168(1) of the Resource Management Act 1991	
Designation purpose sought:	'Education purposes'	
District Plan zoning:	Business – Light Industry	



## 1 Introduction

This Notice of Requirement is submitted on behalf of the Minister of Education (the Minister) and in accordance with Section 168 of the Resource Management Act 1991 (RMA).

The Minister is a requiring authority under s166 of the RMA and is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Minister has responsibility for all education property owned by the Crown, which includes managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Minister wishes to designate an existing educational facility at 22-24 Waipareira Avenue, Henderson, Auckland (Lot 1 DP 193312). The site contains 'Pohutukawa Villa', Middle School West Auckland's Te Reo Bilingual Unit (the Centre) and is used to provide educational support for approximately 60 students. The Centre is an important part of the educational system in the Waitakere region, providing critical services and facilities for Māori teaching and learning. As such, the Minister wishes to protect the on-going operation and enhancement of the Centre.

Middle School West Auckland is operated as a Partnership School (formerly known as Charter Schools) by Villa Education Trust.

## 2 Description of existing environment

The Centre is located at 22-24 Waipareira Avenue, Henderson, Auckland (Lot 1 DP 193312). The site is approximately 7,700m<sup>2</sup>.

As shown in Figures 1 and 2 below, under the Auckland Unitary Plan, the site is zoned Business – Light Industrial, which also immediately surrounds the site to the south, east and west. Immediately to the north is a Special Purpose Area – School, which contains the ACG Sunderland School. There is a strip of Residential – Mixed Housing Urban zoned land approximately 80m south of the site.

The site is located across Waipareira Avenue from a significant commercial area to the west, containing a shopping centre, a large number of commercial/light industrial businesses and accompanying parking areas (primarily accessed from Moselle Avenue and Lincoln Road). The site is directly adjoined by Continental Stairs and Joinery (commercial activity) to the south, a medical centre to the east, and ACG Sunderland School to the north.

The front of the site, which fronts Waipareira Avenue, is sloping grass covered land. This part of the site contains a single sign identifying the facility. There are yellow no stopping lines along the kerb for the entirety of the parcel length.

The site is accessed by a vehicle crossing from Waipareira Avenue, with a driveway to the rear of the site which contains 12 on-site carparks. This rear part of the site contains an existing single-story building covering approximately 550m<sup>2</sup>. To the north of the building is a paved playing court and to the east is a fenced outdoor area in which fruit and vegetables are grown.

Approximately 220m east of the site is Henderson Creek, which is buffered by think vegetation.





Figure 1 Exert from the Auckland Unitary Plan GIS. The site is outlined in blue and zoned Business - Light Industry



Figure 2 Location of the site outlined in blue. Industrial/commercial activites surroud the site to the west and south, a health-care facility to the east and ACG Sunderland School to the north



### 2.1 Historic and existing operations

A resource consent for the establishment and operation of an education centre on the subject site is held by the Ministry of Education, which was granted 31 October 2000. When the site was first established, 10 surrounding schools utilized the space to supplement their existing operations.

The site is now occupied solely by Middle School West Auckland's Te Reo Bilingual Unit, named Pohutukawa Villa. The Centre offers a comprehensive Te Reo Māori programme, as well as a tikanga and kaupapa Māori (protocol) based programme incorporating Te Ao Māori into education.

The Centre accommodates up to 60 year 7-10 students.

Core teaching hours are between 8:30am and 3:30pm weekdays, with the site typically utilised between 8:00am and 7:00pm for general education purposes.

## 3 Description of proposed designation

The proposed designation information has been provided below, in accordance with format in the Minister of Education Designation Schedule found in Chapter K of the Auckland Unitary Plan.

### 3.1 Proposed schedule information

Designation number	For Council input
Requiring Authority	Minister of Education
Location	22-24 Waipareira Avenue, Lot 1 DP 193312
Rollover Designation	Yes
Legacy Reference	N/A
Lapse Date	Given effect to (i.e. no lapse date)

Middle School West Auckland Te Reo Bilingual Unit

### Purpose

Education purposes

For reference, "Education Purposes" means:

a) Enable the use of the facilities on the site by and for the educational benefit of any preschool and school age students (i.e. years 0 to 13) regardless of whether they are enrolled at the institution located on the site.

*b)* Enable the provision of supervised care and study opportunities for students outside school hours in school facilities.

c) Enable the provision of community education (e.g. night classes for adults) outside school hours in school facilities.

d) Include but not be limited to the provision of academic, sporting, social and cultural education including through:

*i)* Formal and informal recreational, sporting and outdoor activities and competitions whether carried out during or outside school hours;



*ii)* Formal and informal cultural activities and competitions whether carried out during or outside school hours;

*iii)* The provision of specialist hubs and units (including language immersion units and teen parenting units) for children with particular educational requirements or special needs.

e) 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.

*f)* Enable the provision of associated administrative services; carparking and vehicle manoeuvring; and health, social services and medical services (including dental clinics and sick bays).

*g)* Enable housing on site for staff members whose responsibilities require them to live on site (e.g. school caretaker) and their families.

### Conditions

The standard conditions for all Minister of Education designations apply to this designation. (These are attached as Appendix B)

### Attachment

No attachments.

### 3.2 Proposed spatial boundary

The proposed Designation will cover Lot 1 DP 193312 in its entirety, as per Figure 3 below.



Figure 3 Area to be covered by the proposed designation



### 3.3 Consideration of alternatives

The site which this notice seeks to designate contains an existing and well-established activity and built environment. Considering this, no alternative has been assessed as part of this process.

### 3.4 Reasoning for the designation

The Minister has responsibility for all education property owned by the Crown, which includes managing existing property, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The designation of existing educational sites is a common technique used nationally by the Minster to ensure his interest in a site and activity is protected. Designating educational facilities provides certainty in the current and future management of education sites and is considered to be an appropriate way to do so.

Designating the subject sites also provides a degree of certainty that the existing land use is intended to continue long term, beneficial to both Council and other surrounding resource users.

## 4 Assessment of environmental effects

The environmental effects of the on-going operation of the Centre have been assessed to accompany this Notice of Requirement.

The educational activities on the site have not previously produced significant adverse environmental effects and are not expected to generate any as operations continue. No alterations to the existing built environment are required for the continued operation of the Centre. Given this, the balance of environmental effects is considered to be largely positive. As the Centre does not restrict it's roll to a certain zoning, it benefits the wider Waitakere suburb and provides a specialist Te Ao Māori educational framework.

In general, the principal environmental effects of educational activities such as that of the Centre are:

- The positive contribution made to local communities;
- The effect on local traffic flows and networks; and
- The effect on the local noise environment and amenity.

### 4.1 Positive effects

Education facilities play a crucial role in the fabric of society and there is an expectation that they will be provided in a quantity and quality to provide for the communities which they service.

In particular, the Centre provides a unique and necessary learning environment where a significant focus is placed on Te Ao Māori. This allows children, who may otherwise not thrive in the standard western educational framework, to learn in a comfortable space and achieve their potential.

The on-going operation of the site not only fulfils the responsibility of the Minister but is inherently consistent with the purpose of the RMA through allowing communities to provide for their social and cultural wellbeing.

### 4.2 Traffic effects

Educational activities impact on the local roading network in two main ways; through generating additional traffic at pick-up and drop-off times and having the potential to disrupt traffic flows through both vehicular and pedestrian traffic.



Bearing in mind the activity has been established for a number of years the effects on the roading network of the on-going operation of the Centre, with regard to the generation of additional traffic, are anticipated to be less than minor.

Additionally, the site is served by an existing accessway from Waipareira Avenue that leads down to an onsite parking and manoeuvring area. This area provides ample space for pick-up and drop-off times, particularly considering the Centre has a relatively small roll of 60 students. Removing this from the active roading network helps mitigate the disruption that Centre may cause on surrounding traffic flows.

Finally, with respect to the permitted baseline as provided in the Auckland Unitary Plan, secondary schools may have a roll of up to 333 students before resource consent is required for the generation of vehicle trips. The Centre falls far below this limit with a roll of 60 students and will produce a significantly lower number of vehicle movements than what is permitted.

Overall, given the above, it is considered that the adverse traffic effects of the Centres continued operation is less than minor.

### 4.3 Noise and amenity

Education facilities, schools and their associated buildings and infrastructure are a typical and expected part of the urban environment fabric. Given that the built environment and vegetation on site is existing, there is no anticipated adverse visual amenity effect from the continued operation of the Centre on the surrounding environment.

Education activities can generate additional environmental noise, particularly during times of outside play or peak pick-up and drop-off times. The surrounding land uses are not considered to be a sensitive receiving environment, particularly given the nearest residential dwellings are approximately 80m to the south of the site. Additionally, the generation of noise will be maintained to an appropriate level through compliance with the standard conditions (Condition 2) that are applied to Minster of Education designations.

Overall, the activity which is subject of this notice is an accepted part of the existing environment. As a result, there are no significant adverse environmental effects anticipated from the Centres continued operation and the effect on the surrounding amenity values are considered to be less than minor.

## 5 Conclusion

This Notice of Requirement is submitted on behalf of the Minister and in accordance with Section 168 of the RMA. The Minister is a requiring authority under s166 of the RMA and is the Government's lead advisor on the New Zealand education system, with the responsibility to manage and facilitate all education property owned by the Crown.

This notice seeks to apply the Ministers designation to a site containing and well-established and existing educational activity, a common technique utilized by the Minister to afford such sites the protection and certainty that is important for the efficient on-going operation of education facilities.

The environmental effects of the Centre's operation have been assessed as part of this notice and, in having regard to the potential for less than minor adverse traffic and amenity effects, the balance of the effects are significantly positive. This is emphasized also by the fact that the activity has been established on the site for several years and is an accepted part of the surrounding environmental fabric.

Therefore, it is considered appropriate to designate the site for education purposes.





 Reference:

 Prior CT:
 97B/285 & 286

 Document No.:
 D483782.2



This Certificate dated the 15th day of March Two Thousand under the seal of the Registrar-General of Land, New Zealand, for the Land Registration District of NORTH AUCKLAND

### WITNESSETH that WHYTE ADDER NUMBER 20 LIMITED

is seised of an estate in fee simple (subject to such reservations, restrictions, encumbrances and interests as are notified by memorial endorsed hereon) in the land hereinafter described, delineated on the plan hereon, be the several admeasurements a little more or less, that is to say: All that parcel of land containing 7700 square metres, more or less being LOT 1 DEPOSITED PLAN 193312



Fencing agreement in Transfer B617944.1



declaring that the within land is hereby acquired for education purposes (support centre) and is vested in the Crown 4.5.2000 at 2.46

for RGL

CANCELLED DUPLICATE DESTROYED



### Land Acquired for Education Purposes (Support Centre)—Waipareira Avenue, Henderson, Waitakere Citv

Pursuant to section 20(1) of the Public Works Act 1981, and to a delegation from the Minister of Lands, R. J. Sutherland, Land Information New Zealand, declares that, pursuant to an agreement to that effect having been entered into, the land described in the Schedule to this notice is hereby acquired for education purposes (support centre) and is vested in the Crown on the date of publication of this notice in the New Zealand Gazette.

#### Schedule

North Auckland Land District—Waitakere City

Area  $m^2$ 

Being

7700 Lot 1, D.P. 193312, subject to a fencing agreement in transfer B. 617944.1. All certificate of title 122D/188.

Dated at Auckland this 10th day of April 2000.

R. J. SUTHERLAND, for Minister of Lands by the Minister for Land Information.

(LINZ CPC/1999/4921)

ln2728

### Land at Ikawai Set Apart for a Public School

Pursuant to section 52 (1) of the Public Works Act 1981, and to a delegation from the Minister of Lands, R. J. Sutherland, Land Information New Zealand, declares the land described in the Schedule to this notice be set apart for a public school and shall remain vested in the Crown.

#### Schedule

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#### Canterbury Land District—Waimate District

Area Being

Reserve 3826, situated in Block XI, Elephant 1.6187 Hill Survey District, part New Zealand Gazette, 1911, page 820, S.O. 4885.

Dated at Auckland this 11th day of April 2000.

R. J. SUTHERLAND, for Minister of Lands by the Minister for Land Information.

(LINZ CPC/99/4889/A) ln2750

#### Road Realignment—Rotowaro Road, Waikato District

Pursuant to the Public Works Act 1981, and to a delegation from the Minister of Lands, R. J. Sutherland, Land Information New Zealand:

(a) Pursuant to section 114 (1) of the Public Works Act 1981, declares that the land described in the First Schedule to this notice is acquired for road and shall vest in the Waikato District Council on the date of publication of this notice in the New Zealand Gazette.

(b) Pursuant to sections 116 (1), 117 (3) and 120 (3), declares the portions of road described in the Second Schedule to this notice to be stopped and amalgamated with the land in certificate of title 148/67, subject to the encumbrances thereon.

### South Auckland Land District—Waikato District First Schedule

Land Declared as Road

Area  $m^2$ 

 $m^2$ 

Part Lot 26, D.P. 1280 (part C.T. 148/67); 159 marked "A" on S.O. 56419.

Being

### Second Schedule

Road to be Stopped

Area Adjoining or Passing Through

1051 Part Lot 26, D.P. 1280, (C.T. 148/67); marked "G" on S.O. 56419.

Dated at Auckland this 5th day of April 2000.

R. J. SUTHERLAND, for Minister of Lands by the Minister for Land Information.

(LINZ CPC/1998/1574)

ln2742

#### Land Set Apart for State School in Manukau City

Pursuant to section 52 (1) of the Public Works Act 1981, and to a delegation from the Minister of Lands, R. J. Sutherland, Land Information New Zealand, declares the land described in the Schedule to this notice to be set apart, subject to the land tenthly described being subject to a right to drain water as created by transfer D. 237256.14, for state school and to remain vested in the Crown.

#### Schedule

#### North Auckland Land District—Manukau City

Area  $m^2$ 

- Being
- 590 Lot 1, Deposited Plan 195839. All certificate of title 124D/758.
- Lot 2, Deposited Plan 195839. All certificate 590 of title 124D/759.
- Lot 3, Deposited Plan 195839. All certificate 590 of title 124D/760.
- 590 Lot 4, Deposited Plan 195839. All certificate of title 124D/761.
- 590 Lot 5, Deposited Plan 195839. All certificate of title 124D/762.
- 590 Lot 6, Deposited Plan 195839. All certificate of title 124D/763.
- 590 Lot 7, Deposited Plan 195839. All certificate of title 124D/764.
- 590 Lot 8, Deposited Plan 195839. All certificate of title 124D/765.
- Lot 9, Deposited Plan 195839. All certificate 612 of title 124D/766.

ha

10.9138 Lot 1, Deposited Plan 187332 and Lot 305, Deposited Plan 185017. All certificate of title 114C/835.

Dated at Auckland this 11th day of April 2000.

R. J. SUTHERLAND, for Minister of Lands by the Minister for Land Information.

(LINZ CPC/1999/5223) ln2741



Appendix B – Designation Conditions

### 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 unites 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	EE dD I	
Sunday 9am to 6pm	55dB L <sub>Aeq</sub>	
All other times	45 dB L <sub>Aeq</sub> 75 dB L <sub>AFmax</sub>	

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;

- 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** 

